

Final  
Environmental Impact Report/  
Environmental Impact Statement/  
Environmental Impact Statement  
Upper Truckee River Restoration and  
Golf Course Reconfiguration Project



## Volume IV

Lead Agencies:



California State Parks



Lake Tahoe  
Environmental  
Improvement Program



Bureau of Reclamation



FINAL  
Environmental Impact Report/  
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Upper Truckee River Restoration and  
Golf Course Reconfiguration Project



Volume IV

Lead Agencies:



California State Parks

P.O. Box 16  
Tahoe City, CA 96145

Attn: Cyndie Walck  
CEQA Coordinator  
(530) 581-0925



Lake Tahoe Environmental  
Improvement Program

P.O. Box 5310  
Stateline, NV 89449

Attn: Brian Judge  
TRPA Project Manager  
(775) 589-5262



Bureau of Reclamation

2800 Cottage Way, Room E-2606  
Sacramento, CA 95825

Attn: Myrmie Mayville  
Lake Tahoe Program Manager  
(775) 589-5240



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# 1 INTRODUCTION AND STATEMENT OF PURPOSE AND NEED

This document is a joint final environmental impact report/environmental impact statement/environmental impact statement (final EIR/EIS/EIS) prepared for the Upper Truckee River Restoration and Golf Course Reconfiguration Project (hereinafter referred to as “the project”) in compliance with the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and Tahoe Regional Planning Agency (TRPA) Compact and Code of Ordinances. The project also serves as the “proposed action” under NEPA and the “proposed project” under CEQA and the TRPA Code of Ordinances. It has been prepared by the California Department of Parks and Recreation (State Parks) as lead agency under CEQA; the U.S. Department of the Interior, Bureau of Reclamation (Reclamation), as federal lead agency under NEPA; and the TRPA as lead agency in accordance with the Compact and Code of Ordinances.

The relevant statutes, regulations, and ordinances guiding the preparation of this final EIR/EIS/EIS are:

- ▶ California Public Resources Code (PRC) Sections 21000 et seq. (CEQA);
- ▶ California Code of Regulations (CCR), Title 14, Division 6, Chapter 3 (State CEQA Guidelines), including Section 15222 (“Preparation of Joint Documents”);
- ▶ National Environmental Policy Act of 1969, as amended (Public Law 91-190, 42 United States Code [USC] 4321–4347, January 1, 1970, as amended by Public Law 94-52, July 3, 1975, Public Law 94-83, August 9, 1975, and Public Law 97-258, Section 4[b], September 13, 1982);
- ▶ Council on Environmental Quality (CEQ) regulations for implementing the procedural provisions of NEPA: Code of Federal Regulations (CFR), Title 40, Sections 1500 et seq., including Sections 1502.25, 1506.2, and 1506.4 (authority for combining federal and state environmental documents);
- ▶ U.S. Department of the Interior, Departmental Manual (DM) Part 516, Chapters 1–7 and 14;
- ▶ Article VII of the TRPA Compact (Public Law 96-551, as revised in 1980);
- ▶ Chapters 5 and 6 of the TRPA Code of Ordinances; and
- ▶ Article VI of the TRPA Rules of Procedure.

CEQA, NEPA, and TRPA require a lead agency that has completed a draft EIR/EIS/EIS to consult with and obtain comments from public agencies (cooperating, responsible, and trustee agencies) that have legal jurisdiction with respect to the project and to provide the general public with opportunities to comment on the draft EIR/EIS/EIS. On August 26, 2010, State Parks released the draft EIR/EIS/EIS for a 60-day public review and comment period. In response to public requests, the review period was extended until November 15, 2010. Public hearings were held at the TRPA Advisory Planning Commission (APC) meeting on October 13, 2010, and at the Governing Board meeting on October 27, 2010, to present the project alternatives and to receive public comments. The public hearings were recorded and public comments transcribed. Written comments were received from federal, state, regional, and local agencies and from businesses, organizations, and individuals. This final EIR/EIS/EIS has been prepared to respond to comments received on the 2010 draft EIR/EIS/EIS for the project.

## **1.1 AGENCY ROLES AND RESPONSIBILITIES**

### **1.1.1 LEAD AGENCIES**

#### **CALIFORNIA DEPARTMENT OF PARKS AND RECREATION**

State Parks is the lead agency under CEQA and the proponent of the project. The agency's mission is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biodiversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation. The 1.4-million-acre State Parks system is made up of 278 classified units and several major unclassified properties.

#### **TAHOE REGIONAL PLANNING AGENCY**

TRPA is the primary permitting agency and the lead agency under the Compact. The project would be required to comply with TRPA's Regional Plan and Code of Ordinances to receive permits for construction. Permitting requirements include a Conditional Permit for stream restoration and Land Capability and Coverage Verifications. TRPA is a bistate regional planning agency created in 1969 by federal law to oversee development on both the California and Nevada sides of Lake Tahoe. TRPA's mission is to "lead the cooperative effort to preserve, restore, and enhance the unique natural and human environment of the Lake Tahoe Region."

In addition, in accordance with the Code of Ordinances, TRPA may not approve a project if it would cause any of the nine TRPA thresholds to be exceeded. If implementing a project would result in an exceedance of an identified threshold, mitigation must be imposed to reduce the impact and maintain the threshold. Under Chapter 6 of the TRPA Code of Ordinances, findings must be made in writing regarding all significant environmental impacts and their associated mitigation measures, with substantial evidence provided in the record of review before final project approval. Specific findings TRPA must make to approve a project are as follows:

- (1) The project is consistent with, and will not adversely affect implementation of the Regional Plan, including all applicable Goals and Policies, plan area statements and maps, the Code, and other TRPA plans and programs.
- (2) The project will not cause the environmental threshold carrying capacities to be exceeded; and
- (3) Wherever federal, state or local air and water quality standards applicable for the region, whichever are strictest, must be attained and maintained pursuant to Article V(d) of the Tahoe Regional Planning Compact, the project meets or exceeds such standards.

#### **BUREAU OF RECLAMATION**

Reclamation is the lead agency under NEPA. The federal agency was created in 1902 to provide water for 17 western states. Reclamation's mission is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public. The project has received federal funding from Reclamation for the planning phase and may receive funding for implementation.

### **1.1.2 TRUSTEE, RESPONSIBLE, AND COOPERATING AGENCIES**

Other federal, state, and local agencies are involved in the review and approval of the project, including trustee and responsible agencies under CEQA and cooperating agencies under NEPA. Under CEQA, a trustee agency is a state agency that has jurisdiction by law over natural resources that are held in trust for the people of the State of California. A responsible agency is an agency other than the lead agency that has legal responsibility for carrying out or approving a project or elements of a project (PRC Section 21069). Trustee and responsible agencies are



consulted by the CEQA lead agency to ensure the opportunity for input and for review and comment on the draft document. Responsible agencies use the CEQA document in their decision making.

Under NEPA, a cooperating agency can be any federal agency other than the federal lead agency that has jurisdiction by law or that has special expertise with respect to any environmental impact involved in an action. Cooperating agencies are designated by agreement between the NEPA lead agency and the cooperating agency. They are encouraged to actively participate in the NEPA process of the lead agency, review and comment on the NEPA document, and use the document when making decisions on the project.

Several agencies other than State Parks, Reclamation, and TRPA have jurisdiction over the implementation of the elements of the project, as identified below.

### **FEDERAL COOPERATING AGENCIES**

- ▶ None

### **STATE RESPONSIBLE AGENCIES**

- ▶ Lahontan Regional Water Quality Control Board
- ▶ California Tahoe Conservancy
- ▶ California Department of Fish and Game

### **OTHER INTERESTED AGENCIES/PARTIES**

- ▶ South Tahoe Public Utilities District
- ▶ El Dorado County
- ▶ Tahoe Resource Conservation District
- ▶ California State Lands Commission
- ▶ California Air Resources Board
- ▶ California Department of Transportation
- ▶ State Historic Preservation Officer
- ▶ Washoe Tribe of California and Nevada
- ▶ Nevada Division of Environmental Protection
- ▶ U.S. Army Corps of Engineers
- ▶ U.S. Environmental Protection Agency
- ▶ U.S. Fish and Wildlife Service
- ▶ U.S. Forest Service, Lake Tahoe Basin Management Unit
- ▶ U.S. Department of Transportation, Federal Aviation Administration

## **1.1.3 REGULATORY REQUIREMENTS, PERMITS, AND APPROVALS**

The following list identifies permits and other approval actions for which this draft EIR/EIS/EIS may be used during agency decision-making processes. The following actions may be under the purview of regulatory agencies other than the lead agencies.

### **FEDERAL ACTIONS/PERMITS**

- ▶ **U.S. Army Corps of Engineers:** Department of the Army permit under Section 404 of the Clean Water Act (CWA) for discharges of dredged or fill material into waters of the United States.
- ▶ **U.S. Environmental Protection Agency:** EIR/EIS/EIS review, filing, and noticing; concurrence with Section 401 CWA permit.

- ▶ **U.S. Fish and Wildlife Service:** Fish and Wildlife Coordination Act review; if take of a listed species is anticipated, Endangered Species Act consultation and issuance of incidental-take authorization for the take. (However, no take of a federally listed species is anticipated.)

## STATE ACTIONS/PERMITS

- ▶ **California Department of Fish and Game, North Central Sierra Region:** Streambed alteration agreement (California Fish and Game Code Section 1602) and protection of raptors (California Fish and Game Code Section 3503.5). If take of a state-listed species is expected, California Endangered Species Act consultation and issuance of take authorization (California Fish and Game Code Section 2081). (However, take of a state-listed species is not anticipated.)
- ▶ **California Department of Transportation:** possible encroachment permits.
- ▶ **State Water Resource Control Board (Lahontan Region 6):** National Pollutant Discharge Elimination System (NPDES) construction stormwater permit (notice of intent to proceed under General Construction Permit) for disturbance of more than 1 acre, discharge permit for stormwater, general order for dewatering, and Section 401 CWA certification or waste discharge requirements. Although State Parks would seek to minimize the risk of construction-related violations of water quality standards, it would nevertheless request an exemption for a potential violation of Section 5.2 of the Basin Plan. Therefore, an exemption from the Lahontan Regional Water Quality Control Board (Lahontan RWQCB) would be required as part of CWA compliance.

## 1.2 BACKGROUND

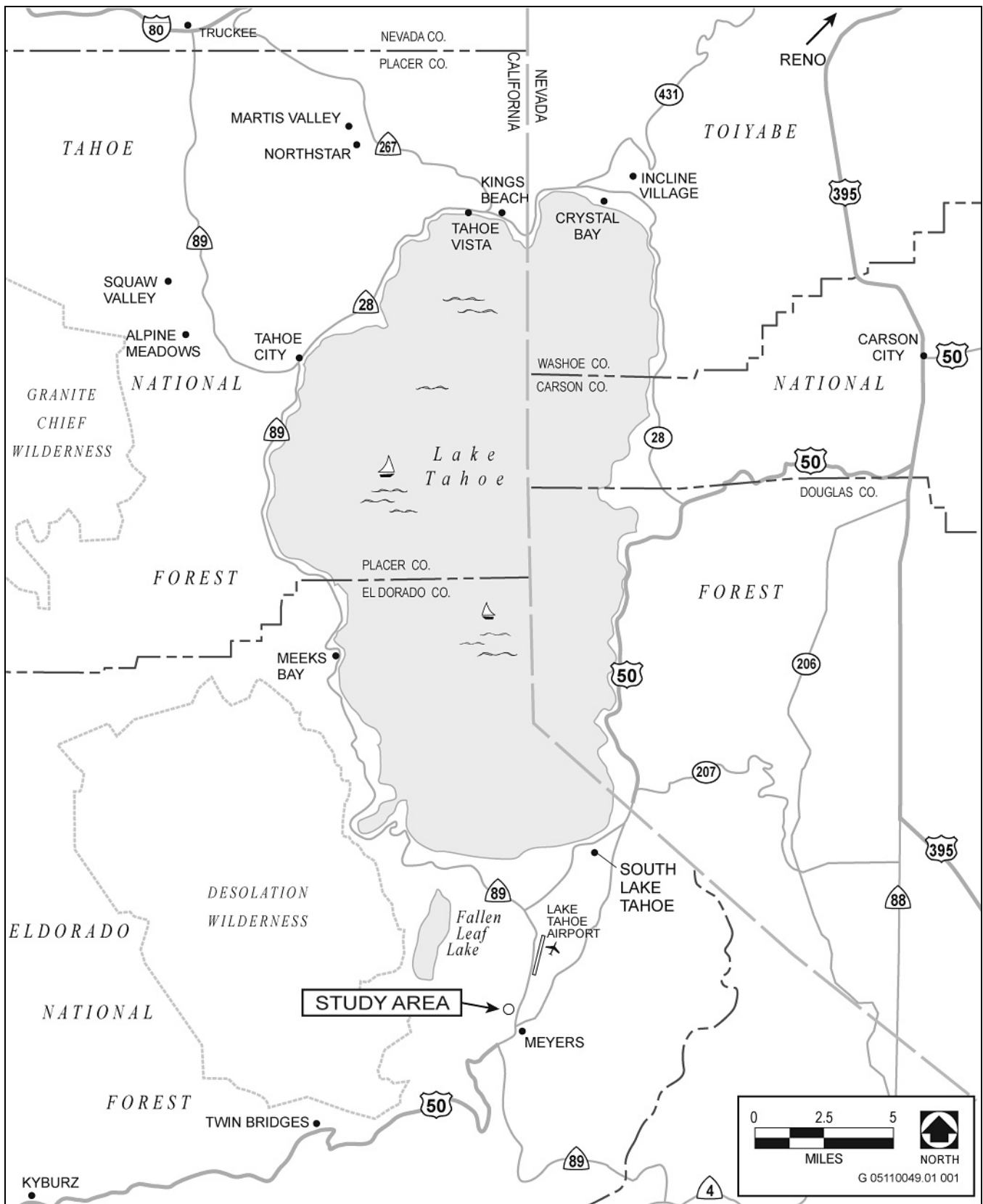
### 1.2.1 CLARITY AND WATER QUALITY OF LAKE TAHOE

Lake Tahoe is a designated Outstanding National Resource Water, renowned worldwide for its clarity and purity (LRWQCB 1995). However, Lake Tahoe's clarity has declined by nearly 30 percent since 1968 (USGS 2010). Studies over the last three decades suggest that the reduction in water clarity of Lake Tahoe is correlated with the delivery of fine sediments from various watersheds in the Lake Tahoe Basin (Basin) and increased phytoplankton productivity, which in turn, has been attributed to an increase in nutrients, especially nitrogen and phosphorus (Goldman 1974, SWRCB and NDEP 2007). The increase in sediment and nutrient load is a direct result of urbanization and other human activities in the Basin.

The Upper Truckee River, which drains the largest watershed in the Basin, has been substantially altered by land practices during the past 150 years (Exhibit 1-1). Throughout its watershed, the river has experienced ecosystem degradation typical of what has occurred elsewhere in the Basin. It has been modified from its original conditions by human activities, such as logging; livestock grazing; road construction; fire suppression; golf course development; quarry construction, airport construction; and residential, commercial, and industrial development. In many locations, the channel was straightened and enlarged, native vegetation was replaced by turf, and untreated stormwater was directed into the river and its tributaries. The channel has incised and is experiencing accelerated rates of bed and bank erosion. These human activities have resulted in reduced habitat quality for plant, wildlife, and fish species in the watershed and increased sediment and nutrient loads discharging into Lake Tahoe from the river, contributing to the declining clarity of the lake.

These alterations have affected water quality by disconnecting the river from its floodplains and wetlands, where fine sediment can adhere to vegetation and vegetation can take up nutrients from streamflows and runoff.

Nutrients, such as nitrogen and phosphorus, can be removed by plant absorption and volatilization by denitrification under certain anaerobic conditions. The nutrients are converted to gaseous or organic forms, fixed into the soil, or simply stored within the soil solution. Floodplains also remove sediment and other suspended particles by slowing the velocity of moving water, decreasing peak flows, and allowing the sediment to settle.



Source: Data compiled by EDAW (now AECOM) in 2006

**Regional Location**

**Exhibit 1-1**

Thus, the water quality of the lake can be protected and improved by restoring the natural functions of the rivers and streams in Lake Tahoe's watershed.

## **1.2.2 UPPER TRUCKEE RIVER WITHIN THE STUDY AREA**

Channel straightening, grazing, logging, and recreational uses have affected the reach of the river within the study area where accelerated levels of bed and bank erosion and habitat degradation now exist. A decrease in stream sinuosity and corresponding increase in slope related to past land uses increased erosive forces in the shortened river channel and led to channel incision. This incision has caused a decrease in flooding of the active floodplain. Floodplain connectivity allows a decrease in the velocity of moving water, decreasing peak flows, and allows the sediment to settle, as described above. Since the floodwaters do not release onto a floodplain, the depth of water in the channel is deeper during events that would normally overflow the channel, creating elevated stress on the bed and banks, resulting in increased erosive forces. The stream continues to adjust to past disturbance and has high rates of instability, and instream and riparian corridor habitat continues to be degraded.

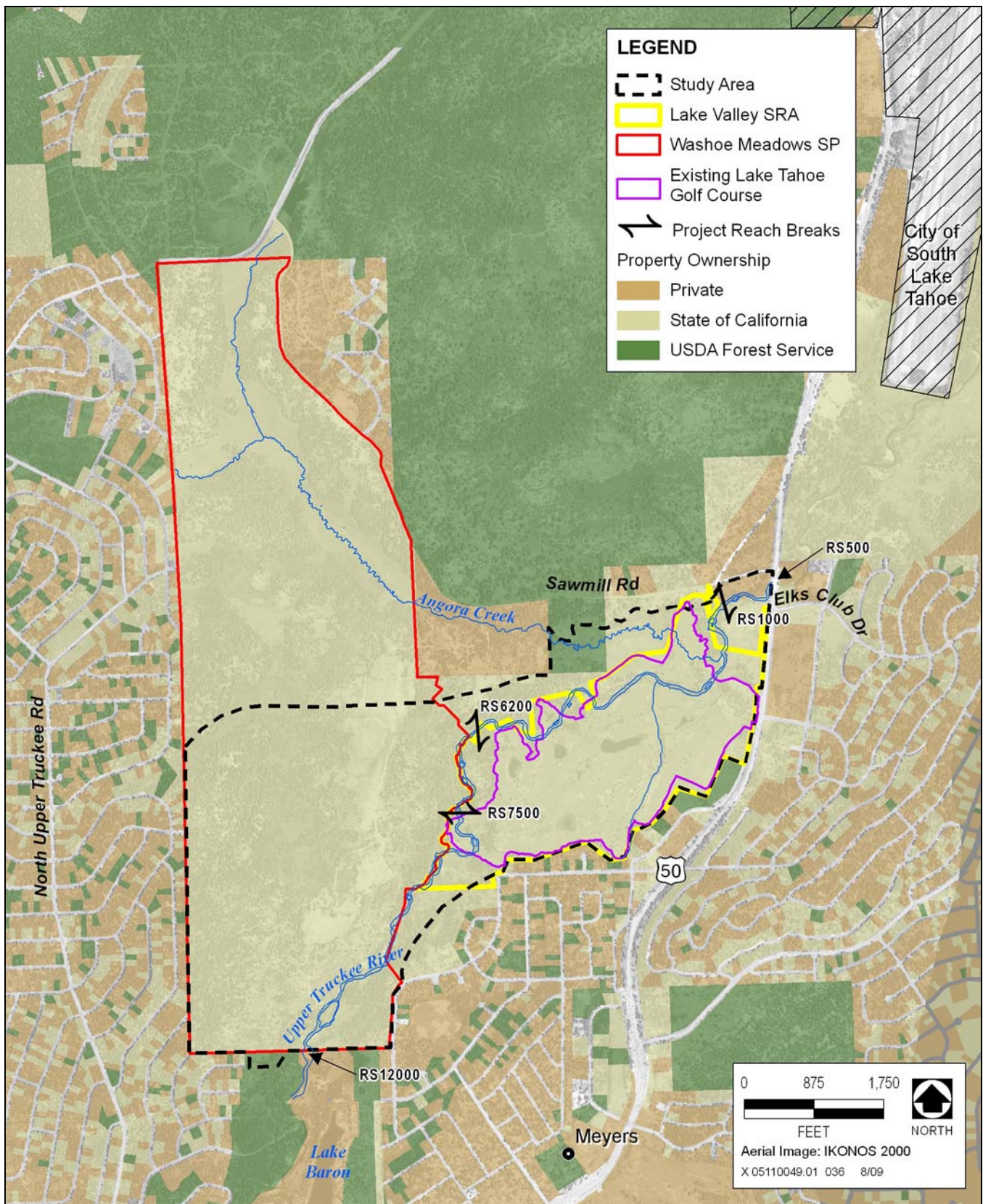
The layout of the golf course is also a concern to geomorphic function and water quality. The golf course was constructed on the meadow and floodplain in the late 1950s. Several undersized bridges constrict flow and accelerate velocities, leading to erosion downstream. The golf course occupies the former meander belt and former wet meadow area along the river, which served as valuable habitat areas before human disturbance. In addition, in many areas of the golf course, nonnative landscaping adjacent to the river and golf course infrastructure essentially lock the river into the modified alignment.

Rapidly eroding, overheightened, fine-grained banks that support limited vegetation or riparian habitat characterize this reach. The banks generate sediment that is introduced directly to the river and eventually into Lake Tahoe. This situation causes not only damage to the golf course infrastructure but deterioration of riparian habitat and degradation of water quality. Limited riparian buffer is present to separate the areas where fertilizer is applied to turf from the river or provide a riparian habitat corridor.

## **1.2.3 RESTORATION OF THE UPPER TRUCKEE RIVER**

Public agencies responsible for the resources of the Basin have been planning and implementing ecosystem restoration and erosion control projects in the Upper Truckee River watershed for many years. Previous restoration efforts in the watershed have included projects along Angora Creek and Trout Creek, both tributaries to the river; the Lower West Side Wetland Restoration Project, located adjacent to the main channel of the Upper Truckee River, near its entry into Lake Tahoe; and the airport reach located in the main stem of the river next to the South Lake Tahoe Airport. Several other restoration projects, including the proposed project, are in the planning stage.

The Upper Truckee River Restoration and Golf Course Reconfiguration Project is identified in TRPA's Environmental Improvement Program (EIP) as a project that is necessary to restore and maintain environmental thresholds for the Basin. EIP projects are designed to achieve and maintain environmental carrying capacity thresholds (thresholds) that protect Lake Tahoe's unique and valued resources. As described in Chapter 2, "Project Description" State Parks is pursuing a restoration project along the reach of the Upper Truckee River that extends from near its upstream entry point near the southern boundary of Washoe Meadows State Park (SP) to the point just west of U.S. Highway 50 (U.S. 50) where the river exits Lake Valley State Recreation Area (SRA). The study area for the project is approximately 520 acres, 13,430 linear feet of the Upper Truckee River, and includes the southern portion of Washoe Meadows SP, Lake Valley SRA, and small portions of U.S. Forest Service (USFS) and California Tahoe Conservancy (Conservancy) lands (Exhibit 1-2). The primary purpose of the project is to restore natural geomorphic and ecological processes along this reach of the river and to reduce the river's suspended sediment discharge to Lake Tahoe. The proposed Preferred Alternative includes modifications of the Lake Tahoe Golf Course to allow for geomorphic restoration of the river, reduce the area of Stream Environment



Source: Data compiled by EDAW (now AECOM) in 2009

### Study Area/Property Boundaries

### Exhibit 1-2

Zone (SEZ) occupied by the golf course, and allow for establishment of a buffer area between the golf course and the river, while maintaining approximately the same size and type of course.

### **1.3 PROJECT HISTORY AND PLANNING CONTEXT**

State Parks began restoration studies and planning for the Upper Truckee River Restoration and Golf Course Reconfiguration Project in 2003. This reach of the Upper Truckee River was identified as the greatest opportunity for rehabilitation among all the river reaches in the *Upper Truckee River Upper Reach Environmental Assessment Report* because it presents an opportunity for full restoration of a large reach and is in public ownership by State Parks (SH+G 2003). Comprehensive evaluations of the existing conditions of the study area were conducted in 2003 and 2006 (Swanson Hydrology + Geomorphology 2003, River Run Consulting 2006). These preliminary evaluations allowed the identification of potential restoration opportunities and constraints and led to the recommendation of four river treatment options: (1) no action, (2) hard engineering or engineered stabilization, (3) creation of an inset floodplain, and (4) full geomorphic restoration. Three of the five alternatives analyzed in the draft EIR/EIS/EIS were derived from these original alternatives. The initial definition of alternatives was supplemented by alternatives developed as a result of the public scoping process and early public planning workshops. Two alternative considerations came out of this public input: evaluation of alternative locations for golf course development and addition of an action alternative that involves decommissioning the golf course and fully restoring Lake Valley SRA to riparian and meadow habitat.

The five alternatives addressed in the draft EIR/EIS/EIS are three golf course reconfiguration concept plans (reduced play, reconfigured 18-hole regulation, and no golf course) combined with two alternative river approaches (restoration and stabilization) and a No Project/No Action Alternative. These alternatives were formulated to represent a reasonable range of restoration approaches, golf course facility levels, and public access. A proposed Preferred Alternative has been identified in this final EIR/EIS/EIS based on the impacts analysis presented in the draft EIR/EIS/EIS and public and agency comments received during the comment period. The analysis of the alternatives was based on conceptual designs of both the golf course and the river. The final layout of both would be refined during final design. However, it is expected that any modifications of the final design would be covered by the analysis in this final EIR/EIS/EIS because it addresses the full range of environmental impacts of a reasonable range of alternatives.

### **1.4 PURPOSE AND NEED, AND PROJECT OBJECTIVES**

NEPA regulations (40 CFR 1502.13) require that an EIS contain a statement of the purpose and need that “briefly specif[ies] the underlying purpose and need to which the agency is responding in proposing the alternatives, including the proposed action.” State CEQA Guidelines Section 15124(b) requires that the project description contain a clear statement of the project objectives, including the underlying purpose of the project. No requirements specifically address the description of a project’s purpose and need in the TRPA Compact or Code of Ordinances. This section is intended to fulfill these requirements of NEPA and CEQA.

#### **1.4.1 PURPOSE AND NEED**

The fundamental need for restoration of the study area’s reach of the Upper Truckee River stems from its contribution of fine sediment to the river and Lake Tahoe through accelerated bank and bed erosion, the impaired natural geomorphic processes and ecological functions, and the diminished quality of the habitat in the riparian corridor caused by prior human alterations, as described above. The purpose of the project is, therefore, to improve the geomorphic processes, ecological functions, and habitat values of the Upper Truckee River within the study area, helping to reduce the river’s discharge of nutrients and sediment that diminish Lake Tahoe’s clarity while providing access to public recreation opportunities in the State Park and SRA. Implementation of the project is an important component of the integrated objectives of State Parks, Reclamation, and TRPA to improve environmental quality in the Basin.

## 1.4.2 PROJECT OBJECTIVES

Consistent with the purpose and need, the following basic objectives of the project were developed during the early planning and public scoping phases of the project:

- ▶ Restore, to the extent feasible, natural geomorphic processes that sustain channel and floodplain morphology.
- ▶ Restore, to the extent feasible, ecosystem function in terms of ecological processes and aquatic and riparian habitat quality.
- ▶ Create a more continuous riparian habitat corridor.
- ▶ Reduce erosion and improve water quality including reduction of the State Parks reach's contribution of suspended sediment and nutrient loading in the Upper Truckee River and Lake Tahoe.
- ▶ Minimize and mitigate short-term water quality and other environmental impacts during construction.
- ▶ Reduce the environmental impact of the golf course on the river's water quality and riparian habitat by integrating environmentally sensitive design concepts.
- ▶ In the SEZ, reduce the area occupied by golf course and improve the quality and increase the extent of riparian and meadow habitat.
- ▶ Maintain public golf recreation opportunity and quality of play to feasibly support a course.
- ▶ Maintain adequate revenue generation from the Lake Valley SRA and/or Washoe Meadows SP.
- ▶ Avoid increase in flood hazard to private property.
- ▶ Avoid increase in safety hazards to golf course and other recreation users.
- ▶ Provide additional opportunities for non-motorized recreation (hiking biking, skiing, etc).
- ▶ Design with sensitivity to the site's history and cultural heritage.

## 1.5 CEQA AND NEPA REQUIREMENTS FOR RESPONDING TO COMMENTS

The State CEQA Guidelines state that written responses to comments received on the draft EIR must describe the disposition of significant environmental issues. The response should contain good-faith, reasoned analysis of the environmental issues raised in the comments. In particular, the major environmental issues raised when the lead agency's position is at variance with recommendations and objections raised in the comments must be addressed.

NEPA requires that the final EIS include and respond to all substantive comments received on the draft EIS (40 CFR 1503.4). Lead agency responses may include the need to:

- ▶ modify the proposed action or alternatives;
- ▶ develop and evaluate new alternatives;
- ▶ supplement, improve, or modify the substantive environmental analyses;
- ▶ make factual corrections to the text, tables, or figures contained in the draft EIS; or
- ▶ explain why no further response is necessary.

Additionally, the final EIS must discuss any responsible opposing view that was not adequately discussed in the draft EIS and must indicate the lead agency's response to the issues raised. This final EIR/EIS/EIS has been prepared to respond to comments received from agencies, organizations, and members of the public on the 2010 draft EIR/EIS/EIS and to present corrections, revisions, and other clarifications and amplifications to the 2010 draft EIR/EIS/EIS, including project modifications made in response to these comments and as a result of State Parks' ongoing planning efforts.

Chapter 5, Section 5.8A of the TRPA Code of Ordinances states that a lead agency of an EIS must consult with and obtain comments from the public and any federal, state, or local agency that has jurisdiction by law or special expertise with respect to any environmental impact involved. Copies of comments of the federal, state, and local agencies that are authorized to develop and enforce environmental standards must be made available to the public and must accompany the project through the review processes.

## **1.6 REQUIREMENTS FOR DOCUMENT CERTIFICATION AND FUTURE STEPS IN PROJECT APPROVAL**

The 2010 draft EIR/EIS/EIS and this final EIR/EIS/EIS will be used to support State Parks' and TRPA's decision on whether to approve the project and Reclamation's decision to issue a record of decision (ROD). Agencies, stakeholder organizations, and individuals who commented on the 2010 draft EIR/EIS/EIS will be notified regarding preparation of this final EIR/EIS/EIS. This notification ensures that interested parties have an opportunity to review how the lead agencies responded to public comments on the draft EIR/EIS/EIS.

This final EIR/EIS/EIS will also be used by CEQA responsible agencies, such as the Lahontan RWQCB and California Department of Fish and Game (CDFG), to ensure that they have met the requirements of CEQA before deciding on whether to issue discretionary permits and approvals for portions of the project over which they have authority. This document may also be used by other state, regional, and local agencies that have an interest in resources that could be affected by the project or would issue permits and/or other regulatory approvals. This final EIR/EIS/EIS will be used by the U.S. Army Corps of Engineers to make decisions on whether to issue permits pursuant to Section 404 of the CWA.

This document is available for review by the public during normal business hours at the following locations:

State Parks' administrative office at Sugarpine Point State Park  
7360 West Lake Boulevard  
Tahoma, CA 96142

State Parks' Northern Service Center  
One Capitol Mall, Suite 410  
Sacramento, CA 95814

TRPA front desk  
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Stateline, NV 89449

Reclamation  
Mid-Pacific Regional Library  
2800 Cottage Way  
Sacramento, CA 95825

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CDs are also available upon request from State Parks. Please submit request to: [utproject@parks.ca.gov](mailto:utproject@parks.ca.gov).

Please refer to notices of the release of this final EIR/EIS/EIS for the specific dates of public meetings.

The State Parks director will make the decision regarding whether to approve the proposed Preferred Alternative, or a variation of it within the range of alternatives addressed in the environmental document, as the project action. Noticing of the Final EIR/EIS/EIS is being distributed to interested agencies, stakeholder organizations and individual who commented during the process (PRC 15088(bB)).

The State Parks and Recreation Commission will hold a public meeting in fall 2011 (see public notice for date, time and location) to consider the general plan amendment proposed as part of the project action and to decide whether to certify the environmental document and approve the amendment to the Lake Valley General Plan. If a project is approved, a notice of determination documenting the decision will then be issued by State Parks. To support a decision on the project, State Parks will prepare and adopt written findings of fact for significant and unavoidable environmental impacts identified in the draft EIR/EIS/EIS, a statement of overriding considerations, if necessary, and a mitigation monitoring and reporting program to ensure implementation of the mitigation measures identified in the EIR/EIS/EIS.

Reclamation will complete a Record of Decision (ROD) on the alternatives at least 30 days after the Environmental Protection Agency publishes their weekly list of EIS's and following certification by California State Parks. The ROD will state the Federal action that will be implemented and will discuss all factors leading to the decision.

The Tahoe Regional Planning Agency (TRPA) Governing Board is tentatively scheduled for December 14, 2012 to vote on certification of the EIR/EIS/EIS. The specific motions are below.

Required Motions: To certify the Final EIR/EIR/EIS for the Upper Truckee River Restoration and Golf Course Reconfiguration Project, the Board must make the following two motions, based on the Final EIS, the TRPA staff summary, and the complete administrative record:

- I. A motion to make the Compact Article VII (d) findings for the Final EIS
- II. A motion to certify the Final Environmental Impact Statement for Upper Truckee River Restoration and Golf Course Reconfiguration Project.

Dates, time, and location of all public meetings will be posted at: [restoreuppertruckee.net](http://restoreuppertruckee.net).

At least 30 days after publication of the final EIR/EIS/EIS, Reclamation will complete a Record of Decision that identifies Reclamation's decision regarding the alternatives considered and addresses substantive comments received on the final EIR/EIS/EIS.

Permits and approvals issued by responsible agencies will be considered after further design development of the selected alternative. They will be scheduled according to the procedures of the approving agencies.

## 1.7 ORGANIZATION AND FORMAT OF THE FINAL EIR/EIS/EIS

This final EIR/EIS/EIS is organized into the following parts so that the reader can easily obtain information about the project and its specific environmental issues:

- ▶ **Chapter 1, “Introduction and Statement of Purpose and Need,”** explains the CEQA, NEPA, and TRPA processes; lists the lead, trustee, responsible, and cooperating agencies that may have discretionary authority or other jurisdiction related to the project; specifies the underlying purpose and need, and project objectives to which the lead agencies are responding in considering the alternatives; outlines the organization of the document; provides information on public distribution and the agency approval processes; and identifies standard terminology and abbreviations used in the document.
- ▶ **Chapter 2, “Project Description,”** presents a summary of the five alternatives, the selection process for recommending the Preferred Alternative, and a detailed description of the proposed Preferred Alternative.
- ▶ **Chapter 3, “Master Responses,”** presents responses to significant environmental issues raised in multiple comments. These have been termed “master responses.” They are organized by topic to provide a more comprehensive response than may be possible in responding to individual comments so that reviewers can readily locate all relevant information pertaining to an issue of concern.
- ▶ **Chapter 4, “Comments and Individual Responses,”** contains a list of all agencies and persons who submitted comments on the 2010 draft EIR/EIS/EIS during the respective public review periods, copies of the comment letters submitted, cross references to relevant master responses, and individual responses to the comments that are not addressed in master responses or need additional detail.
- ▶ **Chapter 5, “Revisions to the Draft EIR/EIS/EIS,”** presents corrections and other revisions to the text of the 2010 draft EIR/EIS/EIS based on issues raised by comments or ongoing planning refinements. Changes in the text are signified by ~~strikeouts~~ where text is removed and by underline where text is added.
- ▶ **Chapter 6, “References,”** identifies the documents used to support the comment responses.
- ▶ **Chapter 7, “List of Preparers,”** lists the individuals who assisted in the preparation of this final EIR/EIS/EIS.
- ▶ **Chapter 8, “Final EIR/EIS/EIS Distribution List,”** provides a list of the various elected officials, government departments and agencies, organizations, and individuals who have been sent the final EIR/EIS/EIS or notification of its availability.

The 2010 draft EIR/EIS/EIS consisted of three volumes. Volume I contained the EIR/EIS/EIS introduction, statement of purpose and need, and alternatives descriptions; Volume II described the affected environment, environmental consequences, and mitigation measures for all alternatives within each resource topic area; and Volume III contained the technical appendices. This document is Volume IV and V of the EIR/EIS/EIS. Together, the five volumes constitute the final EIR/EIS/EIS.

## 1.8 STANDARD TERMINOLOGY, ACRONYMS, AND OTHER ABBREVIATIONS

### 1.8.1 STANDARD TERMINOLOGY

The following standard terminology refers to elements of the project:

- ▶ **“Project vicinity”** refers to the study area and the nearby land surrounding it.
- ▶ **“Study area”** refers to all of the Lake Valley SRA and the southern portion of the Washoe Meadows SP within which all alternatives of the Upper Truckee River Restoration and Golf Course Reconfiguration Project are located.
- ▶ **“Project site”** refers to the area within the study area where State Parks would carry out active construction under the selected alternative.
- ▶ **“Proposed Preferred Alternative”** refers to the project alternative recommended in the final EIR/EIS/EIS for approval, based on information and analysis in the draft EIR/EIS/EIS, public comments on that document, and responses to significant environmental issues raised in the public comments.

The following specific terminology related to the project is included in the draft EIR/EIS/EIS:

- ▶ Terminology related to golf course land use practices is in Section 2.3.2, “Golf Land Management Terminology.”
- ▶ Terminology related to river existing conditions and proposed treatments within specific locations by alternative are provided in Appendix B.
- ▶ Standardized conceptual descriptions and sketches of each treatment type, regardless of which alternative they are proposed for, are included in Appendix C.

### 1.8.2 ACRONYMS AND OTHER ABBREVIATIONS

Table 1-1 defines the abbreviations used in this final EIR/EIS/EIS.

**Table 1-1  
Acronyms and Other Abbreviations**

ACSP	Audubon Cooperative Sanctuary Program for Golf Courses
ADA	Americans with Disabilities Act
APC	Advisory Planning Commission
APE	Area of Potential Effect
Basin	Lake Tahoe Basin
BMP	best management practice
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQ	Council on Environmental Quality
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
cfs	cubic feet per second
cm	centimeters
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
Conservancy	California Tahoe Conservancy
CWA	Clean Water Act
CWHR	California Wildlife Habitat Relationships
dBA	A-weighted decibels
dbh	diameter at breast height
DFG	Department of Fish and Game
DM	U.S. Department of the Interior Departmental Manual
EIP	Environmental Improvement Program
EIR	environmental impact report
EIS	environmental impact statement
EPA	U.S. Environmental Protection Agency
ft	feet
GIS	geographic information system
gpm	Gallons per minute
GPS	global positioning system
Lahontan RWQCB	Lahontan Regional Water Quality Control Board
LCD	land capability district
$L_{eq}$	equivalent noise level
LOS	Level of service
LRP	Legally Responsible Person
LRWQCB	Lahontan Regional Water Quality Control Board
LT	Long term
NAL	numeric action level

**Table 1-1  
Acronyms and Other Abbreviations**

NDEP	Nevada Department of Environmental Protection
NEL	numeric effluent limitation
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NOP	notice of preparation
NPDES	National Pollutant Discharge Elimination System
NRCS	U.S. Natural Resources Conservation Service
ONRW	Outstanding National Resource Water
PAOTs	persons at one time
PAS	plan area statement
PCEs	passenger car equivalents
PRC	California Public Resources Code
PRD	Permit Registration Document
project	Upper Truckee River Restoration and Golf Course Reconfiguration Project
REAP	Rain Event Action Plan
Reclamation	U.S. Department of the Interior, Bureau of Reclamation
ROD	Record of Decision
RWQCB	Regional Water Quality Control Board
SEZ	Stream Environment Zone
SHPO	State Historic Preservation Officer
SP	State Park
SRA	State Recreational Area
ST	Short Term
State Parks	California Department of Parks and Recreation
STPUD	South Tahoe Public Utility District
SWPPP	storm water pollution prevention plan
SWRCB	State Water Resources Control Board
threshold	environmental carrying capacity threshold
TMDL	Total Maximum Daily Load
TRCD	Tahoe Resource Conservation District
TRPA	Tahoe Regional Planning Agency
U.S. 50	U.S. Highway 50
USACE	U.S. Army Corps of Engineers
USC	United States Code
USFS	U.S. Forest Service
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UTRWAG	Upper Truckee River Watershed Advisory Group

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## 2 PROJECT DESCRIPTION

This chapter describes the approach to selection of a proposed Preferred Alternative, including a summary of the other alternatives not selected and the reasoning why these alternatives were eliminated after detailed evaluation. A refined project description for the proposed Preferred Alternative is also presented. The proposed Preferred Alternative is based on additional information developed since release of the draft EIR/EIS/EIS, including comments from the public, responsible and interested agencies, and organizations on the draft EIR/EIS/EIS. Changes to the Lake Valley SRA General Plan are provided in Appendix K and summarized below.

### 2.1 SELECTING A PROPOSED PREFERRED ALTERNATIVE

#### 2.1.1 CEQA, NEPA, AND TRPA REQUIREMENTS

Alternatives evaluated in the draft EIR/EIS/EIS were based on a combination of requirements from CEQA, NEPA, and TRPA provisions. In accordance with Section 15126.6 of the State CEQA Guidelines, the draft EIR/EIS/EIS included an analysis of alternatives that could feasibly attain most of the basic project objectives, a review of a no-project alternative, an assessment of whether feasible off-site alternatives exist, and a discussion of on-site alternatives considered but determined to be infeasible. Section 15126.6 states that the alternatives analysis must:

- ▶ describe a range of reasonable alternatives for the project that could feasibly attain most of the basic objectives of the project but would substantially lessen or avoid any of the significant effects of the project;
- ▶ focus on alternatives capable of avoiding or substantially lessening any of the significant environmental impacts of the project, even if they may be more costly or could otherwise impede some of the project's objectives; and
- ▶ evaluate the comparative merits of the alternatives.

NEPA requires comparable treatment of the alternatives so that their comparative merits may be evaluated (40 CFR 1502.14[b]).

The NEPA regulations (40 CFR 15012.14) require that an environmental analysis include:

- ▶ an objective evaluation of reasonable alternatives;
- ▶ identification of the alternatives considered but eliminated from detailed study, along with a brief discussion of the reasons why these alternatives were eliminated;
- ▶ information that would allow reviewers to evaluate the comparative merits of the proposed action and alternatives;
- ▶ consideration of the no action alternative;
- ▶ identification of the agency's preferred alternative, if any; and
- ▶ identification of appropriate mitigation measures not already included in the proposed action or alternatives.

Unlike CEQA, which permits the evaluation of alternatives to occur in less detail than is provided for a proposed project, NEPA requires the analysis of alternatives to occur at a comparable level of detail. NEPA regulations (40

CFR 1502.14) require agencies to rigorously explore and objectively evaluate all reasonable alternatives and to devote substantial treatment to each alternative considered.

The TRPA Code of Ordinances, Section 5.8 describes EIS requirements. It indicates the need to study, develop, and describe appropriate alternatives to address unresolved conflicts in uses of available resources. Similar to NEPA, TRPA requires that alternatives be analyzed at a comparable level of detail.

The draft EIR/EIS/EIS provided comparable detail in the analysis of a reasonable range of alternatives, including a no action alternative. These alternatives were identified after other alternatives were considered but eliminated from detailed study in the manner directed by NEPA and TRPA (and more than sufficient under CEQA).

## **2.1.2 SCREENING METHODOLOGY**

Criteria developed from the project purpose and need and project goals and objectives, as described in Chapter 1, “Introduction and Purpose and Need,” were used to screen alternatives and to recommend a Preferred Alternative. The primary purpose of the project is to restore natural geomorphic and ecological processes along State Park’s reach of the river and to reduce the river’s suspended sediment discharge to Lake Tahoe while still providing access to recreation opportunities in Washoe Meadows SP and Lake Valley SRA.

Many of the existing golf course holes are in both the active (i.e., 5-year) floodplain and the historic meander belt of the river. In addition, all of the holes are currently situated in sensitive areas designated as SEZ. If an alternative that includes geomorphic restoration of the river is implemented, the river would regain important natural processes, such as occupying a wider meander belt, reconnecting with the adjacent floodplain, and overbanking into the active floodplain more frequently. Thus, one criterion for reconfiguring golf holes was minimizing golf course area within both the active floodplain and the SEZ to provide room for river restoration. Factors considered in selection of the alternatives include:

- ▶ avoiding/minimizing disruption to sensitive resources (e.g., wildlife, vegetation, cultural),
- ▶ reducing/minimizing golf course area within the SEZ,
- ▶ reducing/minimizing golf course area within the active floodplain,
- ▶ reducing/minimizing golf course area within the historic meander belt of the river,
- ▶ accommodating dispersed recreation (i.e., hiking, biking, cross-country skiing),
- ▶ considering connectivity between golf holes,
- ▶ avoiding increase in golf turf area, and
- ▶ exchanging acreage between Washoe Meadows SP and Lake Valley SRA while taking into consideration appropriate uses within each boundary.

The alternatives were also reviewed with respect to the existing Lake Valley SRA General Plan and to determine whether amendments or revisions would be required. The Lake Valley SRA General Plan declaration of purpose states that:

the department shall balance the objectives of providing optimum recreational opportunities and maintaining the highest standard of environmental protection. In so doing, the department shall define and execute a program of management within the unit that perpetuates the units’ declared values, providing for golfing along with other compatible summer and winter recreational opportunities while restoring the natural character and ecological values of the Upper Truckee River....



The general plan acknowledges the existing recreational use as including “a popular 18-hole championship golf course” at the time of acquisition and describes it as “an 18-hole, 6,700 yard championship course, including, greens, fairways, traps, roughs, tees, . . . and a driving range and instruction area” and recommends that this use continues. Although the general plan does not specifically refer to the golf course as a “regulation” course, the yardage identified in the general plan, the maps included in the plan, and use of the term “championship” in the plan imply that it is a regulation course. In addition, “regulation” is a more standard term than “championship,” so it will be used when referring to the golf course described in the general plan amendment.

Finally, the alternatives were screened against the following criteria:

- ▶ **Geomorphic criterion:** An alternative, either individually or in combination with features from other alternatives, improves or restores, to the extent feasible, natural geomorphic processes that sustain channel and floodplain morphology while avoiding any increase in flood hazard to private property.
- ▶ **Ecosystem criterion:** An alternative, either individually or in combination with features from other alternatives, improves or restores, to the extent feasible, ecosystem function in terms of ecological processes and aquatic and riparian habitat quality, including but not limited to reducing the SEZ area occupied by the golf course to improve the quality of SEZ and to increase the extent of riparian and meadow habitat.
- ▶ **Water quality criterion:** An alternative, either individually or in combination with features from other alternatives, reduces stream erosion and improves water quality over the long term, including reducing the reach’s contribution of suspended sediment and nutrient loading in the Upper Truckee River and Lake Tahoe.
- ▶ **Recreational criterion:** An alternative, either individually or in combination with features from other alternatives, maintains golf recreational opportunities and quality of play; provides opportunities for passive, dispersed, non-motorized recreation (such as hiking, biking, and cross-country skiing), and avoids any increase in safety hazards to golfers and other recreation users.
- ▶ **Operational criterion:** An alternative, either individually or in combination with features from other alternatives, improves golf course layout, infrastructure, and management to reduce the environmental impact of the golf course on the river’s floodplain, SEZ, water quality, and riparian habitat by integrating environmentally sensitive design concepts.
- ▶ **Engineering criterion:** An alternative, either individually or in combination with features from other alternatives, is feasible to design, permit, and construct.
- ▶ **State revenue criterion:** An alternative, either individually or in combination with features from other alternatives, is developed, constructed, and operated in a financially responsible and cost-effective manner and generates revenue at a level similar to current levels.

Several alternatives for river treatment were considered during conceptual planning and preliminary assessment of alternative locations for the golf course was conducted in response to early public comments. In both cases, some of the considered alternatives were assessed and found to be infeasible in meeting most of the basic project objectives or in reducing a significant impact of the other alternatives. This preliminary assessment is presented in Section 2.2.2, “Alternatives Considered but Eliminated from Detailed Evaluation,” of the draft EIR/EIS/EIS. Therefore, they were eliminated from detailed evaluation. Alternatives passing the screening review were carried forward into the draft EIR/EIS/EIS for detailed evaluation of potential environmental impacts. The overall plan is conceptual, and final design may reflect modifications to project features made as a result of the normal design refinement process or to satisfy permitting agencies or other parties involved in the final decision-making process. These modifications would not substantially increase the intensity or severity of an impact or create a new significant impact. The alternatives carried forward were as follows:

- ▶ **Alternative 1** – No Project/No Action: Existing River and 18-Hole Regulation Golf Course
- ▶ **Alternative 2** – River Ecosystem Restoration with Reconfigured 18-Hole Regulation Golf Course
- ▶ **Alternative 3** – River Ecosystem Restoration with Reduced-Play Golf Course
- ▶ **Alternative 4** – River Stabilization with Existing 18-Hole Regulation Golf Course
- ▶ **Alternative 5** – River Ecosystem Restoration with Decommissioned Golf Course

These alternatives were developed by State Parks, Reclamation, TRPA, and a team of technical consultants after review of scoping comments received on the notice of preparation and notice of intent, as well as comments provided at public information meetings and a recreation planning workshop conducted to obtain additional public input. The full range of reasonable alternatives was presented for public review during circulation of the draft EIR/EIS/EIS. Based on input from responsible and interested agencies and organizations and public comments, the following text presents a summary of the alternatives and reasoning why they were not proposed as the Preferred Alternative by State Parks. Alternative 2, proposed as the Preferred Alternative, is described in detail below. A summary of the river and golf characteristics of each alternative is presented in Table 2-1.

### **ALTERNATIVE 1 (NO-PROJECT/NO-ACTION): EXISTING RIVER AND 18-HOLE REGULATION GOLF COURSE**

For the No Project/No Action Alternative, Alternative 1, river restoration and changes to the golf course would not be implemented. This alternative represents a projection of reasonably foreseeable future conditions that could occur if no project actions were implemented. Under Alternative 1, existing conditions in the study area would continue into the future. The reach of the Upper Truckee River within the study area would not be restored and would continue to erode and transport sediment to Lake Tahoe, with repairs to the river and golf course infrastructure performed only on an emergency or as-needed basis. The 18-hole regulation golf course would remain as it currently exists, adjacent to the river with an overall footprint of 134 acres, 56 acres in the 100-year floodplain and 128 acres in the SEZ. Five bridges across the Upper Truckee River and four across Angora Creek would remain. Use of the area occupied by the golf course, including cart paths and bridges, would continue without change. There would be no changes to recreational use (trails) in Washoe Meadows SP under Alternative 1. Alternative 1 does not involve altering the existing boundaries in the Lake Valley SRA or in Washoe Meadows SP. An amendment to the general plan text would not be required for this alternative because existing river management approaches and land uses, including golf use, would not change. Because the general plan calls for restoration of the river, this alternative would be inconsistent with the general plan; however, it does not preclude restoration in the future and thus would not require revision.

After a detailed evaluation of Alternative 1, this alternative has not been proposed as the Preferred Alternative for the following reasons:

- ▶ It would not reduce or minimize golf course area within the SEZ.
- ▶ It would not reduce or minimize golf course area within the active floodplain.
- ▶ It would not reduce or minimize golf course area within the historic meander belt of the river.
- ▶ It would not meet the geomorphic criterion.
- ▶ It would not meet the ecosystem criterion.
- ▶ It would not meet the water quality criterion.
- ▶ It would not meet the restoration goals as outlined within the Lake Valley SRA General Plan.

Alternative 1 would continue existing land use practices within the study area. Golf holes and associated undersized bridges would continue to create erosive forces and water quality impacts adjacent to the Upper Truckee River. While economic and recreational goals would continue to be met, Alternative 1 would not meet the goals of improving geomorphic, ecosystem, and water quality targets.

**Table 2-1  
Upper Truckee River Restoration and Golf Course Reconfiguration Alternatives Comparison Table**

	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred Alternative
<b>RIVER CHARACTERISTICS</b>						
River treatment	None	Restore	Restore	Stabilize	Restore	Restore
Channel length total (feet)	11,840	13,430	13,430	11,840	13,430	13,430
Active (5-year) floodplain (acres)	36	77	77	36	77	77
Inset floodplain (acres)	0	1.7	1.7	0.4	1.7	1.7
Restored SEZ (acres) <sup>1</sup>	0	32	43	0	125 <sup>2</sup>	32
Restored 100-year floodplain (acres) <sup>1</sup>	0	20	46	0	54 <sup>2</sup>	22
Restored floodplain/meadow (acres)	0	97	112	0	132 <sup>2</sup>	97
Anchored high-gradient riffle	NA	Upstream and Downstream ends of project reach				
Boulder steps	NA	1 (water intake)		13–15	0	1 (water intake)
Armored riffles	NA	15–25	15–25	Optional	15–25	15–25
Reconnected historic meander	NA	2,490	2,490	0	2,490	2,490
Constructed new channel	NA	1,700	1,700	0	1,700	1,700
Modified existing channel	NA	5,000	5,000	NA	5,000	5,000
Backfilled existing channel	NA	2,600	2,600	0	2,600	2,600
Rock armor bank protection	NA	200	200	7,500 (outside bends)	200	200
Biotechnical bank treatment	NA	2,400	2,400	7,400 (inside bends)	2,400	2,400
<b>GOLF CHARACTERISTICS</b>						
Golf course type	18-hole regulation	18-hole regulation	9-hole regulation or 18-hole executive	18-hole regulation	None	18-hole regulation
Golf course footprint (acres)	134	156	86	133	3	155
Golf course within SEZ (acres)	128	96	85	128	3	96
Golf course within 100-year floodplain (acres)	56	36	10	56	3	34
Golf course adjacent to the Upper Truckee River (linear feet each bank counted separately)	6,382	850	0	6,382	0	850
Intensively managed turf landscape (acres)	98	85	45	95	0	84
Intensively managed facilities landscape (acres) <sup>4</sup>	6	7	6	7	3	7
Minimally managed landscape (acres)	23	44	24	24	0	48
Naturalized landscape (acres)	7	20	11	7	0	16
Bridges over Upper Truckee River	5	1	0	4	0	1
Bridges over Angora Creek	4	0	0	4	0	0
Bridges over unnamed creek	4	4	4	4	0	4
Additional restroom	No	Yes	No	Yes	No	Yes
Paving of unpaved parking area	No	Yes	No	Yes	No	Yes

<b>Table 2-1 Upper Truckee River Restoration and Golf Course Reconfiguration Alternatives Comparison Table</b>						
	Alternative 1	Alternative 2	Alternative 3	Alternative 4	Alternative 5	Preferred Alternative
<b>EMPLOYMENT OPPORTUNITIES</b>						
Total number of jobs	76	80	60–65	80	32	80
Change in number of jobs from existing conditions	0	+4	-11 to -16	+4	-44	+4
<b>OTHER RESTORATION</b>						
Quarry wetland enhancement	No	Yes	No	No	No	No
<b>RECREATION CHARACTERISTICS</b>						
Upper Truckee bridges open to public access	No	1	NA <sup>4</sup>	No	NA <sup>4</sup>	1
Trail along east side of river with Sawmill Bike Trail connection	No	Yes	Yes	No	No	Yes
Trail to corner of Country Club Drive	No	Yes	Yes	No	No	Yes
Improve/reroute trails on west side of river	No	Yes	No	No	No	Yes
Add minor access enhancement at public right(s)-of-way into Washoe Meadows SP (small parking area)	No	Yes	Yes	Yes	Yes	Yes
<b>GENERAL PLAN CHARACTERISTICS</b>						
Lake Valley SRA acreage	173	213	120	173	0	213
Washoe Meadows SP acreage	608	568	661	608	781	568
Note: The overall plan is conceptual, and final design may be modified to satisfy parties involved in the final decision-making process. These modifications would not substantially increase the intensity or severity of an impact or create a new significant impact						
<sup>1</sup> Represents restored SEZ or floodplain that was formerly golf course, but does not include increase in the SEZ or floodplain due to restoration of improved geomorphic function. Increase in total floodplain area discussed in Section 3.3, "Hydrology and Flooding."						
<sup>2</sup> Acreage proposed for full restoration but future planning efforts may allow for other compatible land uses.						
<sup>3</sup> Intensively managed facilities includes buildings, parking lots, and cart paths. Cart paths would be removed under Alternative 5 but not other facilities.						
<sup>4</sup> All bridges removed.						
Source: Compiled by AECOM and State Parks 2011						

### **ALTERNATIVE 3: RIVER ECOSYSTEM RESTORATION WITH REDUCED-PLAY GOLF COURSE**

Alternative 3 would involve full geomorphic and ecosystem restoration of the Upper Truckee River and provision of a reduced-play golf course. A 13,430-foot reach of the Upper Truckee River and adjoining floodplain would be restored. The golf course would be reduced in size to remove golf course from much of the historic meander belt, allowing space for the river restoration. Only a reduced-play golf course, such as an 18-hole executive or 9-hole regulation course, would be feasible within the remaining area outside the restored floodplain. The footprint would be 86 acres, 10 acres in the 100-year floodplain and 80 acres in the SEZ. A portion of the existing golf course would be reconfigured on the southeast side of the river to allow for a buffer between the river and the golf course. No golf holes would be located on the west side of the river. All five bridges would be removed from the Upper Truckee River, and four bridges would be removed from Angora Creek. A new trail would be constructed on the southeast side of the river. Except for river restoration in areas of the historic meander belt, no construction would occur on the west side of the river in Washoe Meadows SP under Alternative 3.

Alternative 3 would reduce the size of the golf course footprint and increase the area of restored riparian area; therefore, changes in the boundaries between Washoe Meadows SP and Lake Valley SRA would be made to adjust the SRA boundary to fit the smaller golf course. In keeping with the respective purposes of Washoe Meadows SP and Lake Valley SRA, the boundary of Washoe Meadows SP would be adjusted (in this case,

expanded) to encompass all of the restored river and riparian corridor. The text of the general plan would need to be amended to allow for development and management of the reduced-play golf course. An interim management plan, which would provide for access and resource management of Washoe Meadows SP, would be prepared. It would address resource protection, public access, and use issues in Washoe Meadows SP, and future planning efforts could be undertaken to allow for recreational development of Washoe Meadows SP under a separate project.

After a detailed evaluation of Alternative 3, this alternative has not been proposed as the Preferred Alternative for the following reasons:

- ▶ It would not fully meet the recreational criterion.
- ▶ It would not fully meet the operational criterion.
- ▶ It would not fully meet the State revenue criterion.
- ▶ It would not fulfill the need for an 18-hole regulation golf course as outlined in the Lake Valley SRA General Plan.

Alternative 3 would modify existing land use practices within the study area. Golf holes adjacent to the Upper Truckee River and associated undersized bridges would be removed, improving geomorphic and ecological functions by decreasing erosive forces and water quality impacts, and improving habitat of the Upper Truckee River and the surrounding SEZ. However, economic and recreational goals would not be fully met under Alternative 3. An 18-hole regulation golf course would not be feasible under Alternative 3, eliminating tournaments that currently provide both economic and recreational opportunities that do not exist elsewhere in the Basin at a reasonable cost to the user. Furthermore, as discussed in the draft EIR/EIS/EIS and presented at public meetings, the economic feasibility to operate a 9-hole or smaller 18-hole course would not be a viable option for potential concessionaires.

#### **ALTERNATIVE 4: RIVER STABILIZATION WITH EXISTING 18-HOLE REGULATION GOLF COURSE**

Alternative 4 would use a combination of hard and soft stabilization to keep the river in its present configuration and includes only minor changes to the existing golf course, including the addition of a restroom near hole 5 and paving and lighting of the unpaved parking area. It would involve the systematic and extensive installation of bank protection and grade controls within the present river alignment at the existing elevations. While the streambed and streambank protections would be relatively rigid, biotechnical treatments with native riparian vegetation would be incorporated to the maximum extent possible while still ensuring stabilization of the river to minimize erosion. Use of biotechnical treatments would restore some habitat value to the riparian corridor but would not improve the floodplain function or restore natural geomorphic processes of the river. Because the river would be stabilized in place, the existing 18-hole regulation golf course would remain largely unchanged. The footprint would be 133 acres, 56 acres in the 100-year floodplain and 128 acres in the SEZ. Three of the existing Upper Truckee River bridges would remain in place, but the two upstream bridges would be replaced by one longer bridge. No bridges would be removed along Angora Creek or the unnamed creek, and no recreation trails would be developed.

Alternative 4 would involve only slight configuration changes of the existing golf course related to the bridge replacement and would not involve modifying its footprint; therefore, no changes in the boundaries between Washoe Meadows SP and Lake Valley SRA would be necessary. The existing Lake Valley SRA General Plan statement of purpose calls for “restoring the natural character and ecological values” of the Upper Truckee River. The text of the general plan would need to be revised under this alternative. An interim management plan, which would provide for access and resource management of Washoe Meadows SP, would be prepared, and future planning efforts could be undertaken to allow for recreational development of Washoe Meadows SP under a separate project.

The general plan’s resource policy states that a river management plan shall be implemented that restores a “more natural channel configuration” and “riparian habitat,” among other things, and that gives foremost consideration

to minimizing “hard engineering.” The approach in Alternative 4 with the river largely stabilized in place would be different from the directives of the general plan for restoring a more natural channel. The use of biotechnical stabilization techniques would improve some riparian habitat values, but it would not minimize hard engineering or constitute restoration of a natural channel as contemplated in the general plan.

After a detailed evaluation of Alternative 4, this alternative has not been proposed as the Preferred Alternative for the following reasons:

- ▶ It would not reduce or minimize golf course area within the SEZ.
- ▶ It would not reduce or minimize golf course area within the active floodplain.
- ▶ It would not reduce or minimize golf course area within the historic meander belt of the river.
- ▶ It would not meet the geomorphic criterion.
- ▶ It would not meet the ecosystem criterion.
- ▶ It would only partially meet the water quality criterion.
- ▶ It would not meet the restoration goals as outlined within the Lake Valley SRA General Plan.

Alternative 4 would continue existing land use practices within the study area. Because the river would be stabilized in place, the existing 18-hole regulation golf course would remain largely unchanged, allowing recreational and economic goals to continue to be met. While erosive forces and water quality impacts from those forces would decrease, golf course holes (and associated irrigation and fertilizer practices) would remain located in areas adjacent to the Upper Truckee River within the SEZ. Economic and recreational goals would continue to be met; however, Alternative 4 would not meet the goals of improving geomorphic, ecosystem, and habitat targets.

## **ALTERNATIVE 5: RIVER ECOSYSTEM RESTORATION WITH DECOMMISSIONED GOLF COURSE**

Alternative 5 involves decommissioning and removing the 18-hole regulation golf course to restore all or a portion of the golf course footprint to meadow and riparian habitat. A 13,430-foot reach of the Upper Truckee River and adjoining floodplain would be restored. All five Upper Truckee bridges and four Angora Creek bridges would be removed. Golf holes would be removed from sensitive lands adjacent to the river much of the footprint would be restored as native meadow and riparian habitat. The clubhouse facility, parking area, and maintenance yard would remain, and the clubhouse would be available for public use at a later date.

Alternative 5 would eliminate golf recreation on Lake Valley SRA, which is a primary purpose for the SRA. In light of the decommissioning and removal of golf course facilities, the primary purpose of the SRA would be eliminated. Consequently, State Parks would revoke the existing Lake Valley SRA General Plan and reclassify the former SRA to become part of a single unit with Washoe Meadows SP. All land of the former SRA would be classified as state park. Maintaining the unit in perpetuity as an ecosystem restoration area with limited public access or outdoor recreation use would not be feasible because of the unmet demand for outdoor recreation in the state and the mission of State Parks. In time, some form of public access and/or development of outdoor recreation facilities would need to be implemented, in keeping with the mission of the department.

If economically feasible, a 9-hole golf course may remain temporarily in use while State Parks evaluates whether to initiate planning for alternative State Park uses. If a reduced-play course remains temporarily, it would be physically configured similar to Alternative 3.

After a detailed evaluation of Alternative 5, this alternative has not been proposed as the Preferred Alternative for the following reasons:

- ▶ It would not meet the recreational criterion.
- ▶ It would not meet the operational criterion.
- ▶ It would not meet the State revenue criterion.

- ▶ It would not fulfill the need for an 18-hole regulation golf course as outlined in the Lake Valley SRA General Plan.

Alternative 5 would involve modifying existing land use practices within the study area. The 18-hole regulation golf course and associated undersized bridges would be removed, improving geomorphic and ecological functions by decreasing erosive forces and water quality impacts, and improving habitat of the Upper Truckee River and the surrounding SEZ. However, economic and recreational goals would not be fully met under Alternative 5 because it would involve eliminating golf recreation and tournaments that currently provide both economic and recreational opportunities that do not exist at a reasonable rate to the user elsewhere in the Basin.

## **2.2 PROPOSED PREFERRED ALTERNATIVE: RIVER ECOSYSTEM RESTORATION WITH RECONFIGURED 18-HOLE REGULATION GOLF COURSE (ALTERNATIVE 2 SLIGHTLY MODIFIED)**

A refined version of Alternative 2 is proposed by State Parks as the Preferred Alternative, hereafter referred to as the Preferred Alternative because it best meets the project's basic objectives among the evaluated alternatives. The refined description of the Preferred Alternative was developed based on the analysis contained in the draft EIR/EIS/EIS; input from the public, organizations, responsible agencies, and other interested agencies; and comments on the draft EIR/EIS/EIS. The refined description of the Preferred Alternative is presented below.

The Preferred Alternative plan is conceptual, and acreages have been modified from the description of Alternative 2 in the draft EIR/EIS/EIS to further address public access issues, such as trail safety, as well as protection of sensitive resources and management considerations. The final design may reflect modifications to project features made as a result of the normal design refinement process or to satisfy permitting agencies or other parties involved in the final decision-making process. However, these modifications are not expected to substantially increase the intensity or severity of an impact or create a new significant impact. Minor modifications presented below do not require recirculation of the EIR or a supplement to the EIS because these modifications do not change any significance conclusions presented in the draft EIR/EIS/EIS. It is expected that any potential project changes occurring during the final decision-making and design process would also be covered by the analysis presented in the EIR/EIS/EIS, subject to CEQA statutes and guidelines. The amendment of the Lake Valley SRA General Plan, required as part of the implementation of the Preferred Alternative, is summarized below and provided in Appendix K. The general plan amendment was evaluated as part of the combined EIR/EIS/EIS prepared for the project. The Preferred Alternative would involve removing several existing golf course holes located in areas of the active floodplain, the SEZ, and the historic meander belt of the river. If these changes were implemented, the river would regain important natural geomorphic processes, such as occupying a wider meander belt, reconnecting with the adjacent floodplain, and overbanking into the active floodplain more frequently. While the overall footprint of the golf course would increase slightly, most of the areas relocated would be within higher capability lands (mostly away from the river and outside of the SEZ) and overall turf area would decrease while turf management would be improved (irrigation upgrades and more naturalized areas). Implementing the Preferred Alternative would allow the continuation of an 18-hole regulation golf course and associated tournaments, thus meeting geomorphic, ecological, recreational, operational, and revenue criteria while still providing dispersed recreation, including new trails along the east side of the river and connectivity to Sawmill bike path.

The reconfigured golf course design concept is intended to make the best use of the site, provide a variety of recreation values, and maintain a proper relationship to the environment and adjacent land uses while remaining flexible to unexpected design details that may come up in the future. Golf infrastructure and holes would generally avoid the most sensitive areas adjacent to the river, which would allow the river room to function more naturally and would provide a more continuous riparian habitat corridor. Alternative 2 was identified as the Preferred Alternative for the following reasons:

- ▶ It would allow room for geomorphic and ecological restoration of the river, while accommodating continuation of an 18-hole golf course.
- ▶ It would minimize connectivity of the golf course and the river.
- ▶ It would minimize or avoid sensitive archaeological sites and sensitive ecological habitat.
- ▶ It would maximize golf use of higher capability lands and minimize use of SEZ lands.
- ▶ It would include trail alignments for nongolf use that connect to the existing trail network and provide for safe use and enjoyment by Washoe Meadows SP and Lake Valley SRA visitors.

## 2.2.1 PROJECT FEATURES

The Preferred Alternative involves river ecosystem restoration with a reconfigured 18-hole regulation golf course. The current 11,840-foot-long reach of the Upper Truckee River would be restored to 13,430 feet with additional floodplain area. Several golf course holes would be relocated to an area on the west side of the river that contains less sensitive land that is further from the river. This would also reduce the amount of SEZ and 100-year floodplain occupied by the golf course (Exhibit 2-1 and Exhibit 2-3). All five existing bridges would be removed from the Upper Truckee River, and one new, longer bridge would be constructed. Four bridges would also be removed from Angora Creek. New trails would be constructed on both sides of the river with connectivity to the Sawmill bike path.

The boundaries between Washoe Meadows SP and Lake Valley SRA would be modified so that the SRA would encompass the reconfigured golf course and the restored river would generally become part of Washoe Meadows SP. The southern portion of the South Tahoe Public Utility District (STPUD) access road would also become part of the SRA. The text and maps of the Lake Valley SRA General Plan would be amended to reflect management of the reconfigured golf course.

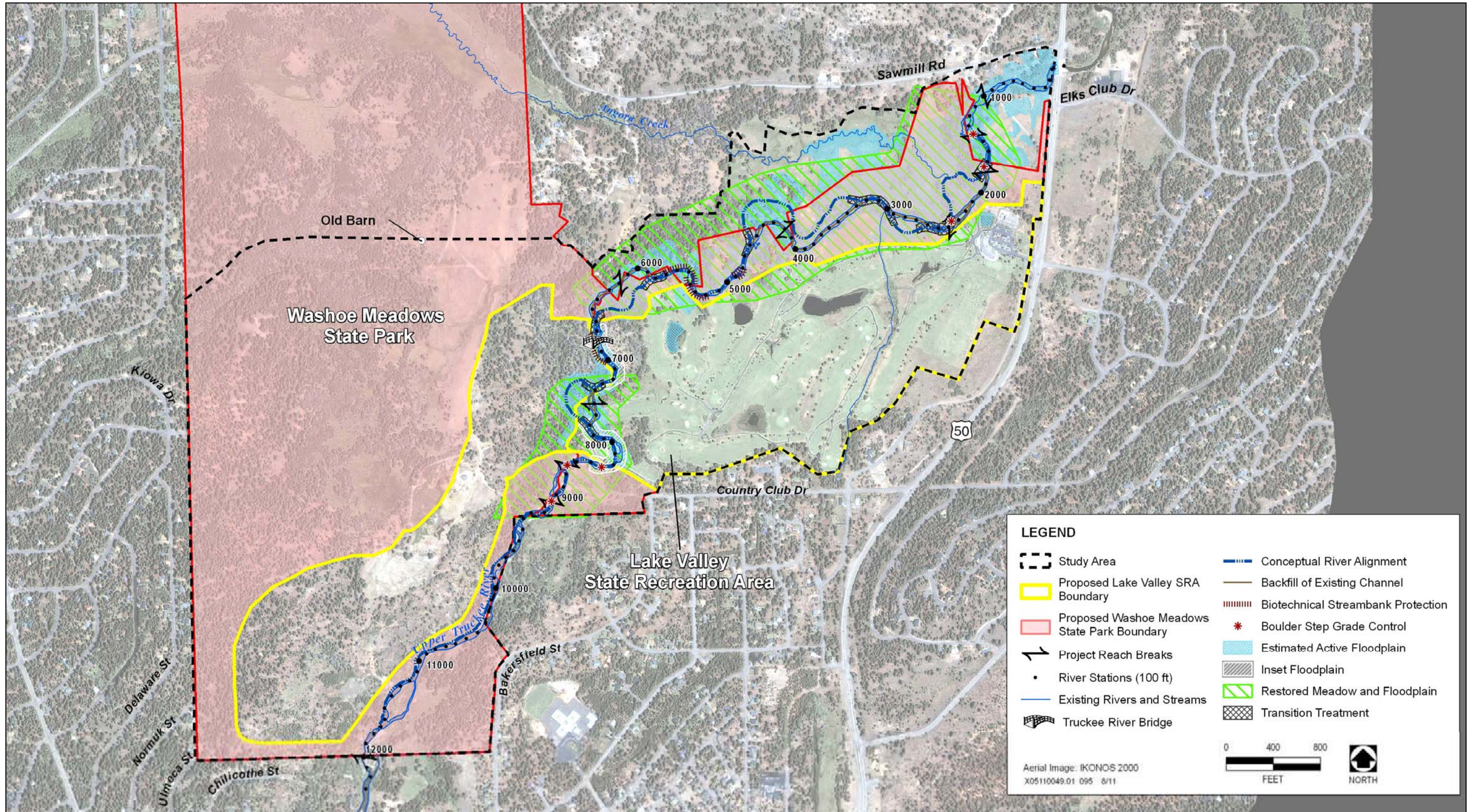
## RIVER AND FLOODPLAIN

### Approach

Under the Preferred Alternative, land uses associated with the golf course would be removed from areas adjacent to the Upper Truckee River which have been occupied by the river in the “recent” past to make room for a more meandering channel and more floodplain area. A portion of the golf course would be relocated primarily to less sensitive higher capability lands, more distant from the river. Under this conceptual design, the amount of golf course adjacent to the Upper Truckee River would decrease from 6,382 linear feet to 850 linear feet by increasing a natural vegetated buffer width from approximately 75 to 100 feet in most areas. While an additional length of golf course would run parallel to the Upper Truckee River, it would be outside the active floodplain and more distant from the river. The increase in the extent of the vegetative buffer would increase treatment areas for protection of water quality from associated golf course land use, and adjoining riparian vegetation communities would be restored. Treatments are also proposed along the lower portion of Angora Creek and the unnamed creek to reconfigure the confluence with the Upper Truckee River.

The restoration approach is designed to reverse the negative trends caused by past channelization, existing infrastructure, and associated land uses. The restoration aspects of this alternative would increase channel length and elevate the channel bed through a combination of grade control features in the existing channel bed, reconnection of historically cutoff or abandoned meanders, and construction of new channel sections. This approach uses elements of both form-based and process-based design (River Run Consulting 2006:2). Meanders that were cut off in the 1940s and 1950s, many of which are still visible on the terrace, would be reincorporated as active channel, and approximately one-half of the existing channel would be retained. The overall approach would decrease erosive force and increase floodplain inundation and duration, thereby reducing sediment supply and providing more opportunity for fine sediment deposition. It would also actively restore riparian habitat adjacent to the river.





Source: Data provided by State Parks in 2011

**Proposed Preferred Alternative: River Ecosystem Restoration**

**Exhibit 2-1**



The river would have an increased channel length of 13,430 linear feet and an active floodplain of 77 acres, including the constructed inset floodplain of 1.7 acres. Approximately 97 acres of floodplain and meadow would be restored, 23 acres within the 100-year floodplain and 32 acres in the SEZ. Most of the golf course would no longer be adjacent to the river; 850 linear feet (425 feet on each side of the river) would remain, in the vicinity of the proposed replacement bridge. The channel bed would be elevated approximately 2 feet on average throughout the project reach.

This design does not rely on or advocate full construction of the envisioned final dimension of the channel form. Rather, it removes infrastructure that prohibits natural processes and provides basic form and grade. Therefore, it anticipates that natural geomorphic processes, such as deposition and active movement of gravel bars, recruitment of woody debris, substrate sorting, and vegetation establishment, would modify the constructed bed and bank features over time to establish a site-specific final channel form.

## Design Features

Under the Preferred Alternative, sections of the existing channel would be incorporated into the new channel, historic meanders would be reactivated, and new sections of channel would be constructed. This combination would provide the desired sinuosity and slope. Approximately 4,240 feet of the existing channel would be used without modification, 5,000 feet of the existing channel would be modified (as described below), 2,490 feet of historic channel remnants would be reconnected, and 1,700 feet of new channel would be constructed. The numeric estimates of length, area, and volume in this section are based on conceptual design and would be modified during final design (Exhibit 2-1). Conceptual treatment descriptions and typical sketches are presented in Appendix C of the draft EIR/EIS/EIS.

The reactivated/reconnected historic meanders would generally utilize the existing outside bank with mature vegetation. The bed, inside bank, and transitions would need to be modified. Constructed streambed stabilization features, including grade control via anchored high-gradient riffles at the upstream and downstream treatment extents, a boulder step grade control at the irrigation water intake, and 15–25 armored riffles at crossovers (i.e., between meanders) and channel segment transitions, would be installed. Approximately 2,600 feet of existing channel would be backfilled or partially backfilled to restore about 4.5 acres of floodplain. Inset floodplain areas would be excavated along approximately 1,300 feet of channel. Additional local cut and fill would be used at various locations to adjust channel dimensions, channel bed elevation, and streambank heights and angles.

Where existing channel is to be incorporated into the new channel, approximately 2,700 feet of new streambank stabilization materials would be installed. Bank stabilization would be mostly biotechnical, emphasizing use of live vegetative materials on banks with reduced heights and angles. However, some areas where more stabilization is needed (e.g., near sewer lines) would also require rock armor streambank protection and/or engineered large woody debris features. It may be necessary to relocate some sewer line sections. Most of the 1,750 feet of existing bank protection would be removed, and the materials would be evaluated for reuse.

Reconfiguration of the golf course out of much of the floodplain and historic meander belt would allow for ecosystem restoration of the Upper Truckee River. Removal of golf course adjacent to the river would allow for restoration of the entire floodplain and meadow north of the river (along Angora Creek) and a large area of the floodplain southeast of the river. All four golf cart bridges would be removed from Angora Creek.

All five golf course bridges over the Upper Truckee River would be removed, and one longer bridge would be installed. This would allow more natural channel dynamics through most of the study reach and minimize risks to infrastructure while providing access to newly developed, more ecologically designed golf features west of the river. The storm drainage pond between the existing holes 14 and 15 would be converted to wetland unless deemed infeasible due to final design of the proposed golf course, the channel and riparian corridor of the unnamed creek would be enhanced, the four golf cart bridges would remain, and the confluence of Angora Creek would also be reconfigured (as discussed below).

The expected geomorphic features, processes, and functions of the study area under the Preferred Alternative are summarized below.

## **Upper Truckee River**

### ***Alignment***

The approximate pre-1940 Upper Truckee River alignment serves as the basis for the proposed location of the restored channel (River Run Consulting 2006). The 1940 historic aerial photos show several meanders that were cut off around that time, reducing sinuosity and increasing slope. The meanders were likely physically cut off by human manipulation to decrease flooding and improve grazing, although some may have been naturally abandoned.

The proposed alignment would increase sinuosity, reduce slope, and increase floodplain area. It is based on a conceptual design that may be modified during final design, but generally it would be composed of a combination of existing (unmodified) channel, modified existing channel, reconnected historic channel (abandoned meanders), and new constructed channel sections. Some portions of the existing channel proposed to remain as active channel would not be modified for the project. The proposed channel length would be 13,430 feet, which would be 1,590 feet longer than the existing 11,840 feet of channel, an increase of 13.4 percent, and the channel would be reconnected to the historic floodplain.

Abandoned meanders proposed for reconnection still have a visible channel shape in both cross section and planform, although some deposition of sediment and encroachment by vegetation has occurred since remnants were part of the active channel. Existing mature riparian vegetation would be incorporated as an immediately well-vegetated outside bank, while other areas of vegetation could be salvaged and used for transplanting. The meander dimensions and elevations would be graded where needed and disturbed areas treated with transplants or other biotechnical techniques. In the lower half of the meadow reach, most of the meanders visible in the 1940 aerial photograph were subsequently filled as part of the original golf course construction (River Run Consulting 2006). In the areas where there are no abandoned meanders with remnant topography or vegetation suitable for reconnection as part of an active river channel, two new channel sections would be created. Mature vegetative materials salvaged from the other historic meanders would be used in construction of these meanders. The final channel alignment for the restored segment would be updated during detailed design based on hydraulic analyses or other design factors (e.g., aquatic habitat, infrastructure locations). Where a reactivated meander or new channel reach may encroach near the existing sewer line, protective features would be installed to avoid damage to the line (i.e., alignment adjustment, sheet pile or other physical protection, or relocation of a section of the sewer line away from the restored river meander). The new alignment would increase channel length in all the treated subreaches from 10 to 60 percent. The percent increase in overall channel length for the study area is approximately 13 percent, allowing the profile grade transition to be distributed over a longer reach and resulting in a lower gradient.

### ***Profile***

The channel bed and resulting long profile would be directly modified to raise the channel bed and indirectly encourage future sediment storage and aggradation. Measures used for these modifications would include reoccupying abandoned meanders present on the existing terrace surface, as well as constructing new channel sections with higher bed elevations, resulting in longer length and decreased slope. Measures within the existing channel would include installing raised grade boulder steps and armored riffles. Proposed locations of the boulder step and armored riffle bed stabilization structures (Exhibit 2-1) have been selected to achieve reachwide stability and minimize erosion, channel avulsion, and damage to infrastructure (exact locations and number may be modified in final design). The boulder steps would require about 6,200 cubic yards of mixed rock (boulder through gravel), and the armored riffles would require about 16,500 cubic yards of cobble and gravel. In addition, clean gravel and cobble could be added to various sites along the channel (quantity not estimated at this time).

Channel lengthening alone would reduce the overall average bed slope for the entire project reach (RS 160 to RS 12000) from 0.22 percent to 0.19 percent. The desired profiles would create a smoother slope transition between the upstream and downstream reaches and create a riverbed closer to the surrounding terrace surface (River Run Consulting 2006). The conceptual proposed channel bed profile (Exhibit 2-2) was derived by connecting proposed bed elevations at the upstream and downstream ends of the treated reaches along the length of the new alignment and adjusting for the existing higher slopes in forested and transition reaches (River Run Consulting 2006). Resulting bed slopes in the treated subreaches would range from 0.14 percent to 0.19 percent.

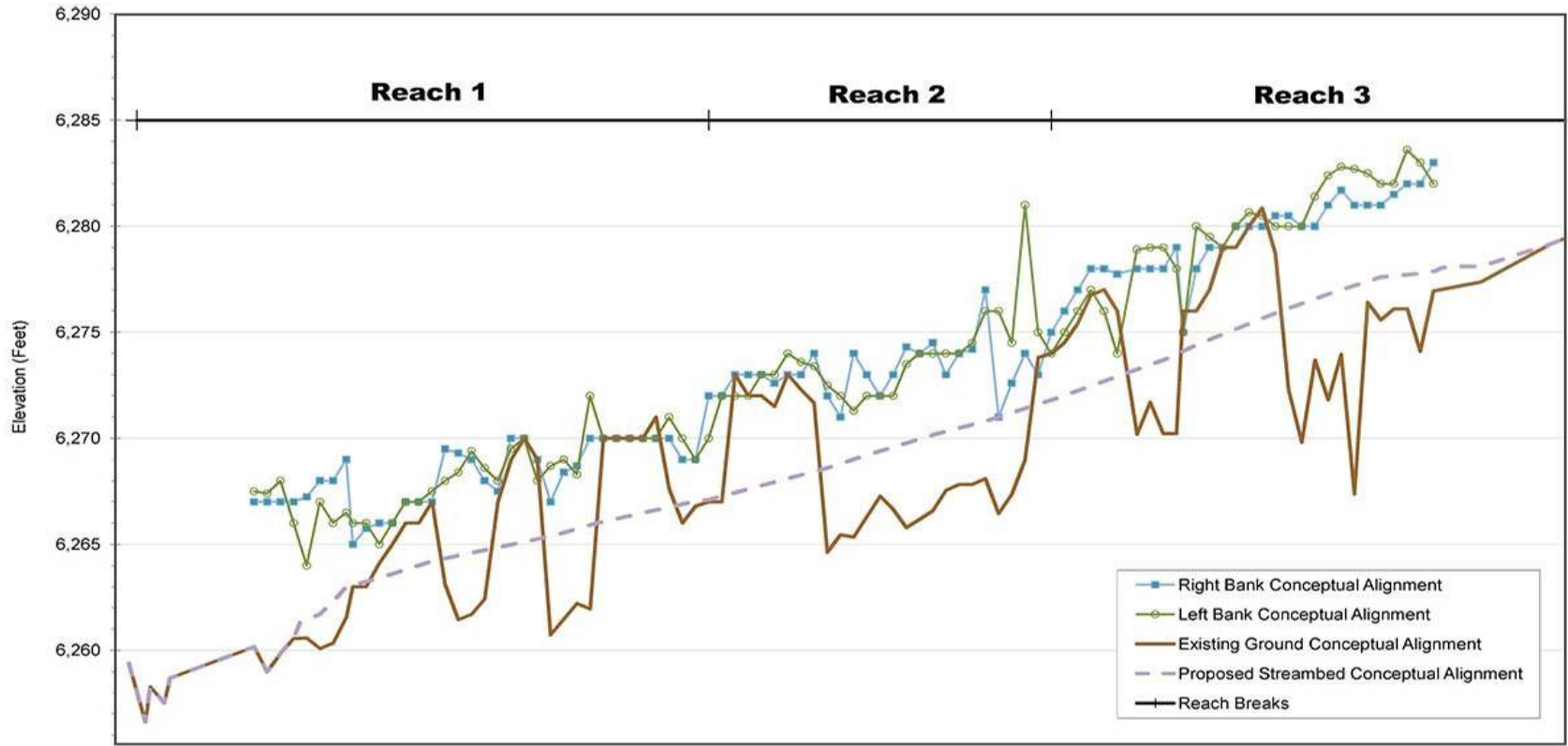
As previously described, varied forms of grade control would be used: anchored high-gradient riffles (boulder and cobble) at the upstream and downstream ends of the treated reaches, a boulder step (boulder and cobble at the water intake), and armored riffles (cobble and gravel), requiring different materials and construction techniques. Anchored high-gradient riffles would be at the upstream and downstream extents of the project and would be reach scale (300-400 feet) features with a combination of about three boulder steps and integrated cobble riffles. The reach-long treatments would use a boulder-cobble mix to form an undulating surface that would be installed in the existing river channel near the downstream and upstream ends of the restored channel. They would both raise and stabilize the streambed, acting as hard grade control structures, composed of boulders and cobble-sized material and installed to remain immobile even during large flood flows (e.g., greater than 100-year peak flow) (River Run Consulting 2006). The current boulder step grade control at the irrigation water intake would be modified and raised slightly. To ensure vertical and lateral stability, grade controls would have buried (keyed) boulders below approximately the 100-year scour depth and would include wings for flanking protection at the upstream and midpoints, extending approximately one-quarter of the channel width into the floodplain at each bank. About 6,200 cubic yards of material would likely be required for the grade control features.

Armored riffles would act as hydraulic controls to establish and maintain bed elevation and slope and would be distributed throughout the restored channel reach. Spacing between riffles would be approximately five to seven bank full channel widths, as documented for functional alluvial channels (Knighton 1998, cited in River Run Consulting 2006). These features would be located at crossovers between meander bends, including at the transitions into meanders to be added (upstream and downstream ends of connections to historic or constructed meanders), as well as in crossovers of retained channel. This would provide continuity in the longitudinal profile. The armored riffles would be soft-grade control structures made of cobble-sized material designed to remain immobile up to moderate flood flows (e.g., 10- to 20-year peak flow) (River Run Consulting 2006). Buried coarse substrate (e.g., cobble) may also be extended at least one-fourth the channel width or to the edge of the active floodplain (5-year) in a trench at the upstream end of the riffles. While the surface materials of these riffles would be expected to be mobile during moderate flood flows, the elevation of the features would be expected to remain consistent over time.

The distance between armored riffles would be about five to eight times the channel width; for example, in areas where restored channel width is proposed to be approximately 70 feet, the spacing would be 350–500 feet (River Run Consulting 2006). The conceptual length and spacing indicate that riffles would compose approximately one-third (2,478 feet) of the total restored channel length. The concept is to use the armored riffles to absorb the full proposed bed elevation change within the restored segment (approximately 11.0 feet vertical change over 7,435 feet planform), with resulting riffle slopes of about 0.15 percent. For the conceptual design, riffles are assumed to average 60 feet wide and 2–3 feet thick (greater in the existing channel areas, less within reconnected or constructed sections) with additional extension of gravel for approximately 30 feet on to the floodplain. Approximately 16,500 cubic yards of cobble would be imported for constructing the riffles.

## **Banks**

The Preferred Alternative involves modifying and protecting streambanks of the proposed channel using a mixture of bank treatments designed and implemented in conjunction with the overall channel treatments to modify existing channel sections, reconnect historic channel sections, and/or construct new channel sections.



Source: Data provided by Valley & Mountain Consulting in 2009

**Proposed Preferred Alternative Upper Truckee River Profiles**

**Exhibit 2-2**

The bank treatment areas were selected to achieve reachwide stability and minimize erosion, channel avulsion, and other damage to infrastructure while generally allowing for natural channel processes.

Biotechnical bank treatments would be installed on a total of approximately 2,700 feet of existing banks along the 9,240 feet of existing channel that would be retained as active channel. Proposed bank treatments would be focused on vulnerable locations, as well as in the upstream and downstream sections adjoining untreated river reaches. The primary type of bank treatment along the entire 1,700 feet of proposed constructed channel sections would be transplanting salvaged materials combined with other biotechnical techniques. The treatment examples include transplanted sod and shrubs, stacked native sod to stabilize outside bends and native sod or seeded blankets in straighter portions, and woody debris brush boxes. Sod and shrub materials could be obtained from within the footprint of the new channels, salvaged from the bottom of reconnected meanders or from adjacent meadows with native vegetation. These treatments allow for more natural channel migration and processes over time than hard-grade control features.

Where abandoned meanders are to be reconnected, final alignment decisions would prioritize locations where robust, existing woody vegetation along remnant channel banks could be incorporated into proposed bank positions. Throughout the approximately 2,490 feet of reconnected meanders, vegetation in the bottom of the channel would be removed and salvaged for revegetation opportunities elsewhere in the study area. However, existing vegetation on streambanks would be preserved to the maximum extent possible to provide immediate stability and habitat. Generally, the area of vegetation protection would be about half of the total bank length. The proposed constructed channel sections are in areas where vegetation has historically been modified for golf course management. Opportunities to incorporate existing woody vegetation into the bank treatments are limited in these areas, so salvaged material and other biotechnical techniques would be used in these sections.

Transition among existing, reconnected, or constructed channel segments that would be part of the proposed active channel would generally be at riffle crossovers. These areas would include treatments combining both streambed and streambank measures that would be installed to provide stability and to smooth the hydraulic connection between segment types. Streambed treatment measures would likely be armored riffles in the existing channel, and were discussed previously in the "Profile" section. Streambank treatments at the junction of the existing channel to be abandoned and plugged would have compacted soil and either mature vegetation transplants or biotechnical measures such as stacked sod. The results of hydraulic analysis conducted during final design may identify the need for treatments at the transitions that include other combinations, such as the use of rock armor, buried sheet piling, living woody vegetation, and large woody debris structures. Meanders that approach within approximately 15 feet of the sewer line would require additional treatment, such as rock armoring or sheetpile.

Riprap, root wads, and/or metal or concrete materials present in the existing bank treatments would be evaluated on a site-by-site basis during the engineering design phase. Most existing bank treatments located in proposed active channel areas would be removed, although some biotechnical treatments could be retained or repaired as needed to stabilize banks. Where levees in the existing channel are to be removed, recontouring to floodplain elevation would accompany other bank treatments. Materials removed would be salvaged for reuse, disposed of, or buried. Existing bank treatments located in channel areas to be backfilled may be removed or buried, as appropriate.

In some areas, particularly in the forested reach, woody debris is relatively common in the channel, and woody debris supply can be expected to remain relatively high (River Run Consulting 2006). Woody debris jams could be constructed in this reach to help promote streambank stability and improve instream habitat complexity. Small jams configured as flow deflectors along channel margins would likely be most effective. These jams would be carefully configured to avoid increasing overall streambank erosion or affecting the function of other planned bed and bank treatments.

In addition to the specific bank treatments described above, in all near-bank areas that would have construction disturbance, protection of the present bank vegetation would be emphasized. The most limited number of channel access points would be used to avoid bank vegetation, trees would be shielded, and shrubs could be pruned while protecting soil and root structures if avoidance is not possible. In areas where existing streambank vegetation must be removed, the project would salvage, store, and reuse plant materials.

### ***Channel Dimension/Capacity***

Under the Preferred Alternative, the channel dimension (width, depth, cross-section area) would be altered, and the channel's capacity to convey flow would be modified in the new constructed sections (reconnected meander sections). In the existing channel sections that would remain part of the active channel, dimensions and capacity would be modified by a combination of implemented direct and expected future indirect changes.

Mussetter Engineering (2000) recommended 600 cubic feet per second (cfs) for bankfull discharge downstream of the study area, based on the 2-year recurrence peak flow. (River Run Consulting [2006:47] concluded this would probably be adjusted to approximately 550 cfs in the project reach, upstream of Angora Creek and other inflows.) ENTRIX estimated the 1.5 year flow to be 450 cfs for the Sunset Reach immediately downstream (ENTRIX 2003). Swanson Hydrology + Geomorphology (2004: III-7) suggested a bankfull discharge within the study area of about 350 cfs, based on field identification of indicators such as vegetation lines and midchannel and point bar surface heights. River Run Consulting (2006:48) emphasized the importance of rain-on-snow events in shaping channel geomorphology and cites field observations during runoff events that support a design flow of 450–550 cfs. Based on these estimates, the proposed channel capacity of constructed portions of the restored channel is estimated at 500–550 cfs (River Run Consulting 2006:48).

For conceptual design, field measurements of water stage and channel dimension under known flows at State Parks' stream gage sites (RS 10600 to RS 1700) were used to develop typical dimensions for a 550-cfs-capacity channel (River Run Consulting 2006:48). At a 550-cfs discharge, this cross section has a top width of about 70–75 feet, a bottom width of about 40–50 feet, and an average depth of about 3 to 3.5 feet. These dimensions provide the conceptual design of the proposed channel geometry at armored riffles or other constructed areas, allowing for variability while keeping continuity. Final channel dimensions for the project would be developed through the design phase, using an iterative approach that incorporates further analysis of channel geometry in functional areas (analog forms), sediment transport data, and hydraulic analyses, along with consideration of other factors.

The proposed 1,700 feet of new constructed sections would be excavated into the existing terrace and floodplain ground surface, with additional grading to adjust for consistent and appropriate bank heights and angles (e.g., outer banks versus point bars) for the stacked sod and/or other revegetation treatments. In all cases, the upper 1 foot of material would generally include salvaged soil, gravel, and vegetation to be reused on bank treatments (described above).

The proposed 2,490 feet of reconnected meanders would require various degrees of excavation and reshaping to meet design elevations and dimensions. Over the decades since they were active channel sections, the abandoned meanders have experienced sediment deposition and vegetation encroachment. Excavation and shaping of the channel bottom and modifications to streambank heights and angles (at least on the inside of bends) would be required as part of the reconnection. The proposed 5,000 feet of modified existing channel would include areas with hard- and soft-grade control structures and areas of bank treatments (described above). To the degree feasible, bed and bank treatments within the existing channel would be designed to reduce channel width and depth, but at a minimum, treatments would prevent channel enlargement. In locations with armored riffles, the final grade would be between 2 and 4 feet higher (positive grade) than the existing channel bed, and final bank treatments would include additional roughness and resistance to help narrow the channel. The restoration concept relies on natural geomorphic processes (e.g., sediment deposition and bar formation, vegetation colonization, woody debris recruitment) in the existing channel to adjust the channel shape and size between treatment areas.



The design assumption is that natural processes of erosion and deposition would establish appropriate channel dimensions over time in areas where the stream is not fully reconstructed (River Run Consulting 2006). While general channel dimensions would be established at armored riffles, in the newly constructed channel and in the reconnected meanders, the intervening reaches would adjust over time in response to local sediment supply, transport, deposition, and erosion. The water surface elevation and channel capacity would be controlled by the profile elevation and cross section of the next downstream riffle crest.

## **Upper Truckee River Bridges**

Under the Preferred Alternative, all five existing golf course bridges would be removed. Removal of existing bridges would include local excavation at the footings to cut existing steel piles 1–2 feet below finish grade. A one-half-inch steel plate would be welded to the newly cut end before reburial. The quantity of material removed would be minimal, and all steel products would be recycled. Bridges with concrete footings would require jack hammering of the concrete to 1–2 feet below finish grade. Exposed reinforcing steel would be cut flush with the concrete surface. Approximately 3 cubic yards of concrete debris would be generated at each footing removal. Existing rock riprap associated with the bridges would also be removed; this material would be salvaged and reused or buried in reaches to be abandoned and filled. The bridge removal sites would be evaluated to determine what degree or type of bed and bank stabilization and revegetation is required. In some bridge removal locations, the site would become part of the inset floodplain, backfilled channel, or other restored surfaces and would be treated as such. In reaches of the existing channel to be incorporated into the final alignment, bed grade elevation would be controlled by restored profile but bank treatments may be needed.

A new bridge would be installed over the Upper Truckee River to accommodate two-way golf cart traffic, service vehicles, and pedestrian access to trails, with a proposed location between RS 6600 and RS 6900. Final location may be modified during final design. The new bridge would span the channel and active floodplain without piers in the channel bed, and total span length would be between 135 and 200 feet to provide flood flow passage. To provide enough room for two-way cart traffic and pedestrian use, either a single 15- to 20-foot-wide deck or two side-by-side 10-foot-wide decks would be installed. The bridge would be designed to pass the 100-year flow, with the bottom of the bridge located approximately 10 feet above the streambed, which would be about 5 feet above the typical water surface (2-year flow).

In the vicinity of the new bridge, an inset floodplain would be excavated into the high streambanks to improve flood flow conveyance and allow for a functional active floodplain area along the main channel. The inset floodplain would be approximately 900 feet long (300–500 feet upstream and downstream of the proposed bridge) and about 50–70 feet wide (20–50 feet in from the channel bank). The depth of excavation into the existing high terrace along the streambanks would range from 4 feet to 8 feet, with a resulting active floodplain surface of about 2 to 3.5 feet above the streambed. Bridge abutments would be along the back edge of the active floodplain, with pilings driven to refusal (below the 100-year-flood scour depth). Conveyance of the 100-year flood would be uninhibited.

The newly constructed bridge would resemble the existing prefabricated steel golf course cart bridges. Decking and railing materials would be similar to those of the existing golf course bridges at holes 6 and 7. Bridge guardrails would conform to the existing course bridge guardrail configuration, and guardrail height would vary with clear span from 3 to 6 feet. An irrigation pipe would be attached to the underside of the bridge deck with pipe clamps. Waterlines would be protected by a steel sleeve one pipe size larger than the irrigation pipe. The pipe would convey water from the existing well and storage ponds east of the river to the proposed golf course areas west of the river.

## **Active Floodplain and River Overbanking**

Under the Preferred Alternative, the active floodplain would be enlarged, providing increased connectivity and frequency of river overbanking through channel restoration. The floodplain along the Upper Truckee River and

the unnamed creek would have improved function, including allowing floodwater to slow down and sediments to settle out, thus improving water quality. The frequency of floodplain inundation along the Upper Truckee River would be increased by reducing confinement that occurs from the existing high streambanks and enlarged channel capacity, particularly downstream of RS 7300. The increased bank length and frequency of overbank flows, direct floodplain topography modification (e.g., inset floodplain excavation and retired/restored golf course areas), and increased elevation of channel bed would combine to increase the active floodplain (5-year) area from 36 acres under the existing condition to 77 acres under the Preferred Alternative, and 23 acres within 100-year floodplain would be restored by removing golf course from these areas.

The conceptual design generally targets restoring connectivity and increasing the length and area of active floodplain adjacent to an appropriately sized channel that would overflow its banks at least once every 1.5 to 2.5 years while still providing flood protection to adjacent private properties. However, the design is not rigidly applying the same channel capacity and bank heights throughout the study area. Because the project spans reaches that would have different natural floodplain relationships, the design concept allows for variability in channel capacity and bank height (River Run Consulting 2006). The stream was likely naturally incised within outwash deposits near the upstream end of the project reaches and had a limited active floodplain in that reach. However, it naturally transitioned downstream to the valley flat meadow reach with a broad active floodplain. Because of the complexity of existing topography, the conceptual design focuses primarily on restoring channel length and profile characteristics rather than on ensuring that channel dimensions match the design (bankfull) discharge throughout.

Because the channel bed profile would be raised with continuity of grade between the upstream and downstream grade controls, the streambank height would be decreased and floodplain connectivity and overbanking frequency would be increased throughout most of the project reach. The 4,190 feet of newly constructed and reconnected historic meanders and some sections of the 5,000 feet of modified existing channel would have a raised bed elevation (at installed grade controls). The 4,240 feet of unmodified existing channel upstream and downstream of the proposed river treatments would still be inset between high-terrace banks and would have limited overbanking under frequent, small-magnitude events (e.g., 2-year to 5-year peak flows). Downstream of the lower-most grade control would continue to be influenced by backwater affects from the U.S. 50 bridge.

### ***Inset Floodplains***

The active floodplain would be enlarged by directly excavating a total of about 1.7 acres of inset floodplain from the existing terrace banks. Proposed locations for the inset floodplains are sites near the upstream end of the project reach where the channel is incised in glacial outwash and would normally be more confined than meadow reaches or sites with severe hydraulic confinement and limited opportunity to substantially raise bed elevation. Floodplain excavation would reduce active channel bank height; provide additional conveyance capacity for large flood flows between the high-terrace banks; and directly remove sediment sources in an area of highly unstable, steep banks. The conceptual design assumes that approximately 2 feet of excavation would occur throughout the proposed inset floodplain areas (River Run Consulting 2006). The design width and configuration of the excavated floodplain could be modified based on a number of criteria, including extent of severe bank erosion, the hydraulic characteristics of the final channel and bridge design, and protection of existing vegetation.

### ***Backfilled Channels***

The approximately 2,600 feet of the existing channel to be abandoned would be converted into about 4.5 acres of functional floodplain by complete or partial backfilling. Backfilling would create sediment and soil depths and properties suitable for conveying and storing groundwater and soil moisture that supports native vegetation that grows well in wet areas. Partial backfilling would mimic oxbows and abandoned meanders such as those that exist in the study area.

The backfilled channel sections would be stabilized at the upstream and downstream ends with compacted soil plugs revegetated with stacked sod or salvaged vegetation. Plugs would be at least 40–50 feet long, extending across the entire blocked channel width to tie in with a finished ground surface that is equal to or slightly higher (up to +1.0 foot) than the existing adjacent surfaces (River Run Consulting 2006). Vinyl sheet piling would be installed across the former channel within the downstream plug, and the upstream plug may contain a rock core or sheet pile to protect against erosive forces. The plugs at the upstream ends of backfilled channel sections must be designed to force all flows up to the design flow (550 cfs) into the proposed new or reconnected meander. However, a portion of flood flows greater than the design bankfull flow could be allowed into the backfill channels, promoting floodplain function and diversity of natural abandoned meanders. The designated streamflow at which overflow into the backfill channels might occur would be selected during final design, based on hydraulic analysis, desired active channel flows and water elevations, and other factors related to floodplain flow paths and residence time.

The amount of fill placed in the backfilled channel sections would depend on many factors. All of the plugs (approximately 20 plugs totaling about 1,000 feet of length) and other areas vulnerable to erosion would be completely filled to ensure stability of the proposed channel margins. Most other areas would be filled to within 1–3 feet of the surrounding ground surface (approximately 55–75 percent fill). Some areas may not be backfilled as deeply, to allow for additional surface water features and habitat values on the floodplain. The final area and configuration of shallow (partial) backfill would minimize stagnant water suitable for mosquito breeding and maximize groundwater and soil water continuity across the floodplain. Areas with standing water are currently treated by the El Dorado County Vector Control District, and reconfigured and restored areas would also be treated. Numerous oxbows and abandoned meanders currently exist, and these features would mimic the existing habitat. As much as possible, material generated on-site through other construction elements would be used for backfill. However, specified materials would likely need to be imported.

### ***Restored Floodplains***

Relocating golf course holes farther from the river would increase the buffer between the golf course and the river and allow restoration of floodplain topography, soils, vegetation, and function. The area selected for removal and relocation of holes was guided by analysis of meander scars on aerial photos, and in the conceptual design, holes are generally relocated outside the historic meander belt. Geomorphic and ecological function would be restored to approximately 97 acres of floodplain/meadow, including 23 acres within the 100-year floodplain where a portion of the golf course would be removed. All existing golf course infrastructure north of the river along Angora Creek in Reach 1 (holes 10, 11, and 12) would be removed, and south of the river, all of holes 6, 17 and 18 and portions of holes 7, 14, 15, and 16 would be removed.

The revegetation treatment of the floodplain would vary depending on the amount of disturbance required to remove golf features, the proximity to the STPUD sewer line, and the species of vegetation present, leading to a range of treatment options that could be applied. In order of decreasing intensity, these options are:

- ▶ removing fill, grading, soil rebuilding, and revegetating;
- ▶ removing shallow fill and exposing buried native rhizomes or revegetation;
- ▶ deep-ripping, amending, and revegetating;
- ▶ seeding and irrigating; and
- ▶ abandoning turf.

Where ground elevation was raised during construction of the existing golf course (e.g., greens, tee boxes, spoils, and levees), the historic topography would be restored by removing nonnative turf and fill material and/or local grading. The final elevation would match the native predisturbance grade. Minimum required cover for existing sewers would be maintained. In other areas where the naturally diverse and complex topography was smoothed for golf course landscaping, grading would be used to recreate topographic variability similar to natural floodplains. Topsoil would be salvaged and replaced at the restored elevation. Revegetation would use native seed

or plants appropriate to the site, would consist of seeding and plug plantings or application of pregrown sod mats, and would generally be followed by application of mulch (loose or hydraulically applied) or coconut fiber fabric to provide initial erosion protection. At suitable locations, willow plantings (cuttings, stubs, or entire rooted clumps) would be clustered to reestablish willow-meadow complexes. Where willows are desired but preexisting relict turf is present, measures would be applied to create a competitive advantage for willow over the meadow vegetation in which they would be planted.

In areas with only shallow fill that may have buried natural soil and native meadow rhizomes, the turf and fill would be removed, and the surface would be evaluated to see whether rhizomes are viable or if native sod or seeding is required. If needed, the disturbed surface would be seeded with additional desirable species (e.g., *Deschampsia cespitosa*) and mulched or covered with fabric.

Soils would be deep-ripped and amended if needed in areas where the golf course topography is generally appropriate for the restored floodplain but there is no evidence of native species competing with the turf, or the soil conditions are not conducive to the desired vegetation type. Prepared soil areas would be seeded and/or planted with plugs of desired species and mulched or covered with fabric.

Seeding over existing golf course turf may be used in locations where the existing vegetation is desired for erosion protection and/or the soil profile would not require modification to support the desired future vegetation. This approach would be used in areas that show minor, interspersed native species competing with the turf or that would have a higher soil moisture after restoration, which would result in golf turf species being outcompeted with time.

Turf abandonment treatments may be used in locations where existing vegetation has native wet meadow graminoids or another desired vegetation community present and vigorous. Native species such as *Carex nebrascensis* grow up through the turf and readily outcompete golf turf and reestablish wet or mesic meadow habitat with the restored hydrology. During the transition period before native species dominate, existing turf would provide erosion protection.

Areas anticipated to support mesic meadow and dry meadow could be treated with ripping and planting in bands oriented along topographic contours, alternating with parallel bands of seeding and mulching with the abandonment treatment (combination of the above two treatments).

Existing golf turf would be tilled and incorporated into subsurface fill or removed and salvaged for other use and/or disposed of off-site, and any undesired layers of sand or soil would be scraped and disposed of off-site or reused as fill.

These floodplain treatments could be applied to the entire floodplain in one season or could be applied in strips perpendicular to the river over a 2- to 4-year period so that all of the vegetation would not be disturbed simultaneously. The untreated strips would be replaced with native vegetation once the treated strips have good vegetation establishment.

### **Other Enhancement Efforts**

A seasonal drainage in the southwest area of the golf course footprint was previously diverted into a ditch that has since headcut and gullied. That gully would be recontoured and the stream channel rebuilt into a natural configuration. Where this drainage crosses the golf course, a cart path bridge would be required. The quarry wetland pond restoration, as described in the draft EIR/EIS/EIS, is no longer proposed as part of the Preferred Alternative because further evaluation concluded that the area is naturally recovering and establishing properly functioning habitat and would not benefit from the further improvements previously described.

### ***Unnamed Creek***

The unnamed creek that flows northward through the golf course between existing holes 1 and 3 and enters the Upper Truckee River at RS 3000 was previously straightened and channelized into a ditch. Under the Preferred Alternative, this creek would be enhanced. The four cart path bridges would not be removed, but the northernmost bridge would be designated for trail use outside the golf course footprint and might be relocated slightly downstream for recreational safety, depending on the final golf course design.

Along the unnamed creek, the setback from golf course landscaping turf would be slightly widened to increase the naturalized landscape. Within this zone, turf would be removed (where needed), and native vegetation would be planted to improve stormwater treatment and increase habitat. As feasible, the low-flow channel of the creek would be modified to add more channel length and increase potential for small, active floodplain areas in the buffer zone. The lower reach of the creek, which is currently piped, would be day-lighted and restored.

Under the Preferred Alternative, the mouth of the unnamed creek would be moved and raised, and its orientation would be adjusted relative to the restored Upper Truckee River alignment. Approximately 300 feet of the unnamed creek would likely need to be replaced with a newly constructed channel to the east that curves to meet the new Upper Truckee River position about 275 feet further downstream than at present. Two or three cobble-boulder step-grade control features and biotechnical bank stabilization treatments would be installed along the approximately 225 feet of new, reoriented channel. Reorienting the creek mouth would reduce erosive forces on the banks of the Upper Truckee River.

### ***Angora Creek***

The lower  $\frac{3}{4}$  mile of Angora Creek was restored in 1997 (as described in the draft EIR/EIS/EIS). The restoration incorporated a portion of an abandoned historic Upper Truckee River meander as part of the restored Angora Creek channel. Under the Preferred Alternative, the bed of the Upper Truckee River would be raised, and the historic meander previously occupied by Angora Creek would be reconnected to the restored Upper Truckee River. The mouth of Angora Creek would be relocated approximately 200 feet upstream of the current confluence to the point where the creek currently enters the historic meander. The lower 200 feet of Angora Creek would be restored to an off-channel oxbow feature, and four pedestrian and cart path bridges would be removed.

## **18-HOLE REGULATION GOLF COURSE RECONFIGURATION**

The conceptual 18-hole regulation golf course design for the Preferred Alternative reconfigures Lake Tahoe Golf Course by relocating up to seven entire and two partial golf course holes to the western side of the Upper Truckee River and upgrading drainage for retained areas of the course. Those existing holes identified for relocation are within the historic meander belt and active floodplain of the Upper Truckee River. They would generally be relocated onto higher capability lands farther from the river to minimize use of SEZ lands, avoid sensitive biological and cultural resources known to exist in Washoe Meadows SP, and maintain a buffer from the river and adjacent residential areas (Exhibit 2-3). Where golf course holes would be removed from the river corridor, the riparian/floodplain areas would be restored (as described above).

The reconfigured golf course would have an overall footprint of 155 acres, 64 acres of which would be native vegetation (minimally managed and naturalized landscape), and 91 acres of intensively managed (nonnative vegetation or coverage). The area of golf course in SEZ would be reduced to 96 acres, 34 acres of which would be in the 100-year floodplain. All five existing golf course bridges over the Upper Truckee River would be removed, and one new bridge would be constructed, 850 linear feet of golf course would be adjacent to the river at the replacement bridge to allow for playability; however, as described below golf course design will include safety measures for trail users. The overall plan is conceptual and final design may be modified in order to satisfy parties involved in the final decision making process. These modifications would not substantially increase the intensity or severity of an impact or create a new significant impact.

## **Golf Course Design Concept**

The reconfigured course is proposed to be environmentally sensitive and sustainable design. The golf course would be integrated into the natural landscape using a site-specific design approach with the intent of minimizing land disturbance. The conceptual design minimizes potential golf course impacts on the natural ecosystem while maintaining a high quality golf experience. It also provides an opportunity to create interpretive signs throughout the course, calling out environmental enhancements that would result from the project, as well as various habitats, plant, and animal communities located in the study area. The combination of providing a high quality recreational opportunity, maintaining open space, and preserving visual and functional quality of the landscape are a few of the key design goals. While tree removal would be substantial under this alternative the layout was designed to minimize this effect by placement in relatively open and previously disturbed areas that would have minimal impact on the ecosystem while still allowing an 18-hole regulation golf course. The design would incorporate measures to continue Audubon Sanctuary certification through the Audubon Cooperative Sanctuary Program for Golf Courses with ecologically sound land management and the conservation of natural resources.

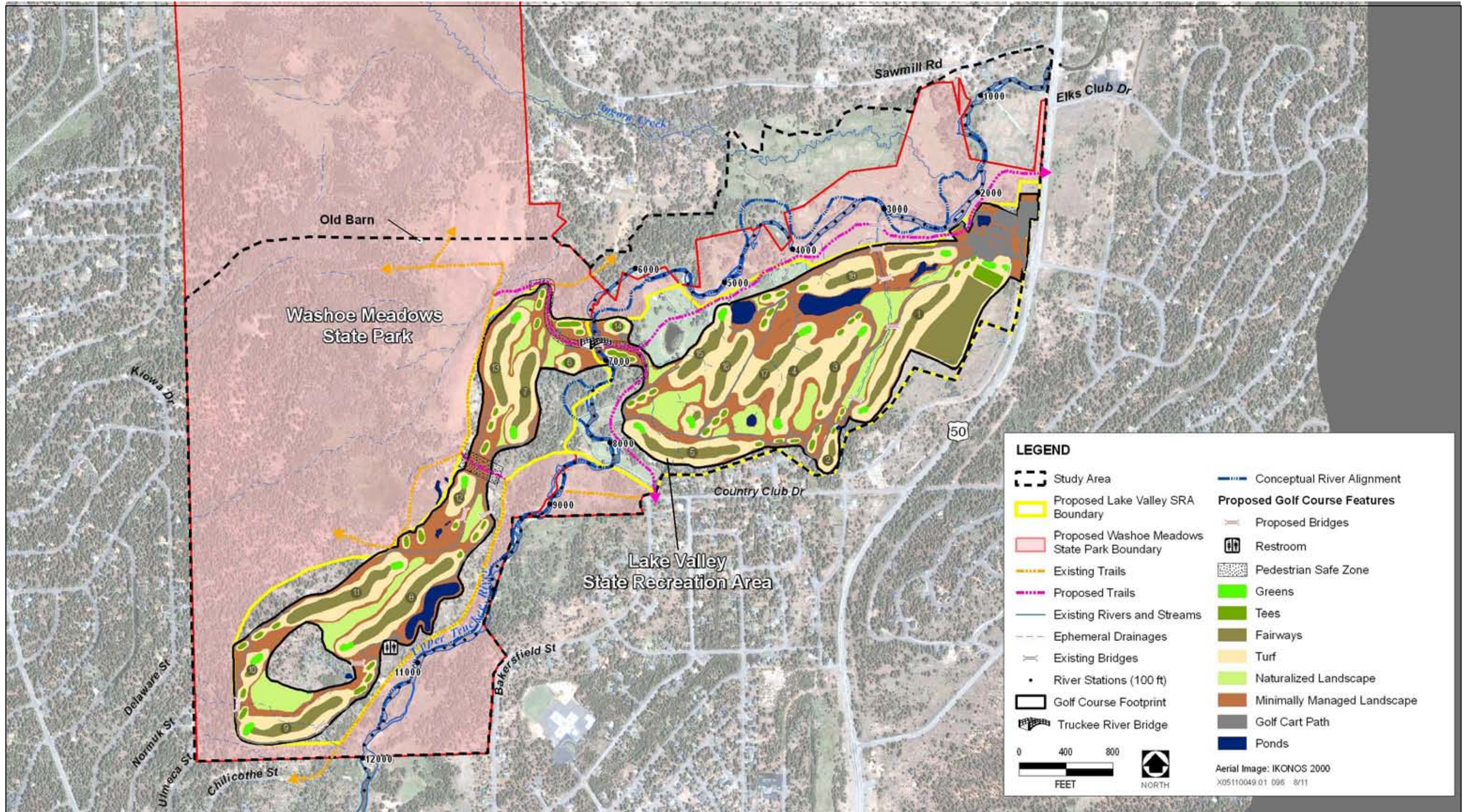
A classic links style golf course is proposed under the Preferred Alternative, where wider turf areas would be placed only in main landing zones so that turf is narrower near tees. All turf areas (intensively managed) would be buffered using native grasses (minimally managed). The existing golf holes would be modified to match this style. Golf course holes remaining on the east side of the river would be reconfigured and upgraded to improve playability, drainage, turf quality, irrigation efficiency, water collection system and to incorporate current BMP technology. As part of this reconfiguration, the unnamed creek crossing the center of the golf course and discharging into the Upper Truckee River also would undergo modification (e.g., added setbacks and buffer areas between turf areas and the creek, and native vegetation treatments in those buffer areas). All areas where existing golf facilities are removed within the current golf course footprint and are no longer used as part of the new course would be restored to a native landscape and removed from the Lake Valley SRA. These areas would receive minimal grading to restore natural topography and drainage. They would then be planted with native vegetation and managed only for natural values as part of Washoe Meadows SP.

### ***Course Layout and Routing***

The conceptual routing and layout of the reconfigured golf holes is based on the proposed use for the golf course and existing characteristics of the study area. The exact configuration of the golf course would likely be modified during final design; however size and layout considerations would remain the same. Topography and natural features would be incorporated into the routing to create a natural character unique to the site and integrated into the natural setting. Routing of this conceptual design takes into consideration environmentally sensitive areas, drainage patterns, climatic conditions and other factors that would affect playability, construction, and maintenance of the golf course.

The current Lake Tahoe Golf Course is an 18-hole regulation length, par 71 course with a total walking distance of 6,741 yards. The current course has three sets of tees at 6,742; 6,327; and 5,702 yards. The course rating and slope for the three tees are, respectively, 70.8/126, 68.9/120, and 66.7/109.

The conceptual design for the reconfigured course maintains its status as an 18-hole regulation course designed to be able to host tournament play, with approximately the same slope, rating, length, par, and variety of holes as currently exist. In addition to the natural features of a site, the golf course layout incorporates design features, such as teeing areas, greens complexes, sand and grass bunkers, and water features to define the strategy of each hole and produce the desired visual quality, keeping in mind circulation, speed-of-play, and safety. For areas that lack character or topography, these features would be used in conjunction with golf course routing to create playability, surface drainage, and aesthetics.



Source: Data provided by State Parks in 2011

**Proposed Preferred Alternative: Reconfigured 18-Hole Regulation Golf Course**

**Exhibit 2-3**





The reconfigured golf course would incorporate and improve sections of the existing golf course that are distant from the river, construct two new holes that cross the river, seven new holes on the west side of the river, removing golf course from most areas adjacent to the river. All existing cart paths that are not within the footprint of the reconfigured golf course would be removed, and the area would be restored to native topography and vegetation. The asphalt would be disposed of off-site, and the area would be tilled, seeded with native seed, and mulched. New cart paths would be constructed within the reconfigured golf course footprint to serve the new holes. Asphalt cart paths would be approximately 8 to 9 feet wide in areas of one-way traffic, and 12 feet wide in areas of two-way traffic. Exhibit 2-3 shows the new path layout. A section of the new cart path route would also serve as a walking trail on the west side of the river to provide non-golf recreation access across the course and to the new bridge, and connecting to newly constructed trails that tie into the bike path on the east side of the river.

The portion of the course on the west side of the river would be designed so maintained turf areas are surrounded by native vegetation. The intent is to create a course that blends well with existing terrain and natural vegetation. This concept creates more target-style golf, where wider turf areas would be placed only in main landing zones (fairways through greens), so manicured vegetation is narrow near the tees and minimized overall, resulting in tee areas being more like islands in the native landscape. In some cases cart paths would cross through portions of natural landscape between holes. Fairway and rough areas would be minimized to accommodate play with little disturbance of existing natural landscape. A 1.6 acre pond is proposed for irrigation and stormwater treatment in the area of a former oxbow on the terrace. A new 650 square foot restroom facility would be constructed near the new hole 9 on the west side of the river. A connection to the existing power and sewer lines located at Chilicothe Street would be installed. Access to the restroom would be via the cart path described above. If this location is not deemed feasible during final design the restroom facility may be located near the current hole 5 as described in the draft EIR/EIS/EIS under Alternative 4.

Grading west of the river would be minimized using the natural contour to the extent possible. Modifications to the natural contour would only be made where necessary to create playable slopes for golf, positive drainage, and to properly elevate greens and tees. Grading of landforms west of the river would require an estimated 210,000 cubic yards, including topsoil salvage. All material would be used on site. An estimate of approximately 4,800 yards of sand and gravel would be required for tee, green, and bunker construction on the west side of the river, as well as the 32 acres of new sod.

The design for the two holes to cross the river is necessitated to reduce long green-to-tee distances and to keep play moving at an acceptable pace. The existing layout is easy to walk and the proposed course should also remain as easy to walk as possible. The two new par 3 holes across the river would be “target holes” to minimize the golf landscape footprint redesigned to lead up to and away from the river; target holes minimize impacts on the stream zone because they are shorter holes with limited turf. The par 3 holes would require about two acres of turf and would be graded so drainage is toward the surrounding buffer zone and would not return flow directly to river. These par 3 holes would have minimal rough and create an island of turf in the native landscape. The turf area for these holes would be sufficiently wide to contain the majority of golf shots. The perimeter of the turf area for the two new holes playing across the river would be marked as environmentally sensitive areas. This marking would dictate that players not enter the area adjacent to the turf at any time, not even to search for lost balls, thus reducing any impact players may have on the river ecosystem. Only maintenance staff would enter sensitive areas (upon occasion) to retrieve balls. The river holes would also enhance the quality of the playing experience and create an opportunity to bring focus to the interpretation for the river restoration.

Existing golf course holes would be modified to tie in with the proposed new holes and river restoration project. The proposed design would update the portion of the existing golf course to be incorporated to reduce environmental impacts, and natural areas between holes would be expanded. In the proposed design, several holes or portions of holes near the river would be removed and the area restored. Three existing holes would have minor routing adjustments to tie in with the new holes west of the river and reduce excessively long green to tee walks. Six other existing holes and the practice areas would be improved to reflect the character and quality of the new holes. This work would include local grading, new irrigation, drainage cart path improvements, and replacement

of bunker sand. Tees, greens, and portions of fairways that need to be re-configured would be re-sodded, and existing bunkers would be rebuilt as well as spot treatment in problem areas. Areas out of play between holes that currently have managed vegetation would be restored to natural native vegetation. Approximately 100,000 cubic yards of grading would be required with materials balanced on site. About 7,200 cubic yards of sand and gravel would be imported for construction of tees, greens, and bunkers.

### **Land Management**

The footprint of the golf course includes areas managed for golf as well as adjacent or surrounding areas managed for natural resources. (See Table 2-2 for land management descriptions.) In the reconfigured 18-hole golf course conceptual design, the total golf course footprint is increased from 134 to 155 acres; however, it includes more areas managed for natural resource values (natural landscape) as well as increasing less intensively managed (golf landscapes) than the previous footprint. The amount of intensively managed area decreases from 104 acres to 91 acres, which includes reduction in turf from 98 to 84 acres, the amount of minimally managed acreage is 48 acres and areas managed as natural landscape increase to 16 acres in the Preferred Alternative from 7 acres under existing conditions . Some portion of existing intensively managed areas would be modified to develop new out-of-play areas of natural landscape, composed of native vegetation (scrub and grasses) that surround tees and greens, and native vegetation areas would be incorporated into the natural landscape on the western side of the river. All improved or new turf areas would either be covered with sod or seeded. In the case of sod, where existing turf occurs, it would be pulverized and incorporated into the seedbed. Greens would be composed of bentgrass, and fairways, tees, and roughs would be bluegrass or fescue. A fescue blend would border all turf areas to act as a buffer (minimally managed area) between the highly maintained turf areas and the natural landscape. Alternatively only the tees, greens, and rerouted areas would be re-grassed. Under the reconfigured 18-hole regulation golf course conceptual design, riparian habitat would be further enhanced by planting native species between and around holes.

<b>Table 2-2 Land Management Descriptions</b>					
<b>Landscape</b>	<b>Area</b>	<b>Native Vegetation</b>	<b>Mow</b>	<b>Irrigate</b>	<b>Fertilize</b>
Natural landscape	Natural area	Yes	No	No	No
Minimally managed golf landscape	Minimally managed vegetation	Yes	No	Occasional	No
Minimally managed golf landscape <sup>1</sup>	Ponds	Yes	No	No	No
Minimally managed golf landscape <sup>2</sup>	River berms	Yes	No	No	No
Intensively managed golf landscape	Tees, greens, fairways	No	Yes	Yes	Yes
Intensively managed golf landscape	Rough	No	Yes	Yes	Rarely
Intensively managed golf landscape	Lawn or landscaped areas	No	Yes	Yes	Rarely
Intensively managed golf landscape	Buildings, parking lots	N/A	No	N/A	N/A
Notes:					
<sup>1</sup> Ponds are used for stormwater collection and irrigation supply.					
<sup>2</sup> River berms are used to decrease flooding with the existing golf course.					
Source: State Parks 2011					

Currently, the golf course drains toward the river with little to no buffer. The proposed drainage concept would regrade areas of the golf course and remove golf landscape adjacent to the river. Additionally, existing erosion hazard sites affecting infrastructure would be reduced by bridge removal, as well as by restoration of a more functional river. Drainage would be designed to collect runoff on the course and run it through natural biofilter vegetation buffers to ensure it does not run directly into the river or the unnamed creek. Also, source reduction practices are in place within the management zones around ponds, thus fertilizer and pesticide use is limited near water bodies.

Under the Preferred Alternative, the surface water diversion from the Upper Truckee River would remain a component of the irrigation water supply system. However, use of this diversion would be limited to periods when the exiting well cannot produce a sufficient water supply or is under repair. The diversion infrastructure would be protected with a boulder step grade control structure as part of the river restoration design.

Implementation of improved water conservation strategies would be integral to this alternative. The irrigation and drainage system in the vicinity of the existing holes would be replaced with new, more efficient computerized technology controlling the rate, amount, and timing of irrigation water application in order to minimize soil erosion, runoff, and fertilizer and pesticide movement. The irrigation system would be designed to have an average application rate below the infiltration capacity of the soil so that no surface ponding would occur and maximum efficiency of water use would occur without excess deep percolation. All irrigation would be based on a water balance method which takes into account plant water use as monitored by environmental conditions, soil drainage, and natural rainfall.

Existing irrigation heads are 360-degree spray with 90-degree spray and do not allow for targeting application. These would be removed. Irrigation piping and wire would be left in the ground, and a new piping and control system would be installed. Approximately 11,000 feet of new irrigation pipe would be placed at a depth of about 30 inches, and approximately 45,000 feet of new irrigation pipe would be placed at a depth of about 18 inches. The new irrigation heads would allow for directional control and closer spacing to better target irrigation application and water conservation. The well and pond at the existing hole 9 would continue to be used for irrigation purposes. The stormwater pond west of the existing hole 15 would be regraded and restored as oxbow/wetland floodplain habitat as described in the river and floodplain section above. This feature would be adjacent to but outside the golf course footprint.

The new irrigation system proposed on the west side of the river would include a 1.6-acre, 5-foot deep stormwater and water supply pond adjacent to the proposed hole 9 and approximately 11,000 feet of new irrigation pipe would be placed at a depth of approximately 30 inches, and approximately 45,000 feet of new irrigation pipe would be placed at a depth of approximately 18 inches. Construction of the new pond would be in a high-terrace older oxbow. If this option is not feasible because power could not be brought in, then the pond between current holes 13 and 16 would be enlarged for water supply to this area, with water supplied from the well for all ponds. A pipe attached to the new bridge with a maximum 10 inch diameter would connect to the irrigation system on the east side of the river.

Lawn mowing would continue to occur typically from early morning until mid to late afternoon, and occasionally into the evening. Fertilizer use at the Lake Tahoe Golf Course is minimal and would continue in the same manner. It typically occurs between May and October. The applications start once the soil temperature reaches 55 degrees Fahrenheit and continues through summer (on greens and tees, to a lesser degree on the fairways). Most fertilizers used are slow release. Use of slow-release fertilizer minimizes the amounts of fertilizer free in the soil solution, which could be leached. Fertilizers used on-site that are not considered slow release either are applied as spoon fed on greens only (on approximately 2 acres) or are applied in a manner that approximates a slow-release feeding in that they are applied in such small quantities (per acre) that they do not overwhelm the soil's ability to hold and then release to the plant to match growth rates. Nitrates and soil are both negatively charged, which prevents the soil from holding on to excess nitrate. Whatever nitrate is not used by the plants could be lost to the groundwater; therefore, nitrates applied at the golf course are minimal and only included where they are secondary ingredient of

other products (for example, calcium products). Fertilizer use is focused on fairways, tees, and greens and not within the rough or “minimally managed” areas. Herbicides are used only in spot treatments, and pesticide use is also minimal. Fungicide is used on the putting greens once each fall. Fertilizer, pesticide, and herbicide use is expected to be similar to or less than under existing conditions because of the reduced footprint, decreased water demand for irrigation, and improved irrigation infrastructure included in the Preferred Alternative. No changes in the seasonal application schedule or general types of chemicals needed would occur.

BMPs associated with the facilities are discussed below in Clubhouse, Maintenance, and Parking Facilities section.

### ***Land Capability and Coverage***

The TRPA developed a system for allowable coverage based on the Bailey system, which considers vegetation, soils, hydrology and slope to determine a “land capability class” for lands within the Tahoe Basin. These land capability classes have a percentage allowable coverage associated with them. State Parks worked with TRPA staff to verify the land capability within both park units and map the areas of coverage, including those that existed prior to 1972 (pre-Bailey system) that still exist or that have been removed and restored, as well as any coverage that has been added after 1972. The restored pre-1972 areas were banked for later use, after deducting any post 1972 coverage that had been added. Coverage within the Lake Tahoe Golf Course consists of the golf cart paths, the parking lot, unpaved parking area, service roads, and associated club house and maintenance building as well as a small pump house and the golf course bridges. While the golf course landscaping is considered disturbance it is not considered coverage. Coverage within Washoe Meadows SP includes several trails, gravel and dirt service roads, and a barn. Most of the coverage in both units existed prior to acquisition by State Parks. A program has been implemented by State Parks to restore some of the disturbed areas of coverage both in Washoe Meadows SP and Lake Valley SRA and the restored pre-1972 coverage has been banked as mitigation.

Tables 2-3 and 2-4 present the distribution of land coverage per land class for both Washoe Meadows SP and Lake Valley SRA within the study area. Coverage changes are based on existing park boundaries to show relative changes; however, TRPA has evaluated coverage changes as one unit. Allowable coverage for the project is either that allowed by the Bailey system or total pre-1972 verified coverage (minus reductions previously used onsite), whichever is greater. This method is described in Section 20.5 of the Code of Ordinances where the amount of land coverage existing prior to the project in the project area exceeds the base land coverage for the project area prior to 1972 coverage is “grandfathered” in. Section 20.5.C discusses relocation of existing land coverage where relocation from one portion of a SEZ to another portion is allowed due to a net environmental benefit to the SEZ. Net environmental benefit to a SEZ is defined as an improvement in the functioning of the SEZ and includes, but is not limited to: (a) relocation of coverage from a less disturbed area to a more disturbed area or to an area further away from the stream channel; (b) retirement of land coverage in the affected SEZ in the amount of 1.5:1 of the amount of land coverage being relocated within a SEZ; or (c) for projects involving the relocation of more than 1000 square feet of land coverage within a SEZ, a finding, based on a report prepared by a qualified professional, that the relocation will improve the functioning of the SEZ and will not negatively affect the quality of existing habitats. Under the latter criterion, land coverage relocation in the affected SEZ can be at a 1:1 ratio (Gustafson, pers. comm., 2010). Relocation of the coverage farther away from the river that allows for a geomorphic restoration of the SEZ currently occupied by the golf course will improve the function of the SEZ and not negatively affect existing habitat.

An additional 3,312 square feet of pre-1972 coverage is located within the study area adjacent to Lake Valley SRA on Conservancy property.

**Table 2-3  
Coverage Impacts Summary for Lake Valley State Recreation Area (square feet)**

Land Class	Total Coverage Allowable <sup>1</sup>	2010 Verified Existing Coverage	2010 Verified Banked Coverage	Hard Coverage Proposed <sup>2</sup>	Soft Coverage Proposed <sup>2</sup>	Total Proposed Coverage <sup>2</sup>	Excess Coverage <sup>3</sup>
1a		0	–	0	0	0	0
1b	319,631	286,219	33,412	231,131	14,554	245,685	73,946
1c		0	–	0	0	0	0
2		0	–	0	0	0	0
3		0	–	0	0	0	0
4		0	–	0	0	0	0
5	217,086	13,585	5,126	49,287	2,593	51,880	165,206
6	22,559	0	–	0	0	0	22,559
7		0	–	0	0	0	
Total							

Notes:

<sup>1</sup> Total Coverage allowed is the amount allowable under either Bailey system or pre-72 grand-fathered, whichever is greater.

<sup>2</sup> Includes existing coverage

<sup>3</sup> Excess coverage available is either that allowed by LCD or that allowed by grandfathered pre-1972 coverage, whichever is greater, and is coverage credit available for future use.

NR = none required.

NI = no impact.

Source: Data provided by State Parks 2011

## **Bridges**

The five golf course bridges that cross the Upper Truckee River would be removed and replaced with a single bridge crossing that spans the floodplain. The proposed bridge would be much longer (*approximately* 135 to 200 feet) than the existing undersized bridges with approximately 150 linear feet of launchable riprap and 700 feet biotechnical bank treatments, reducing impacts to river erosion and stability. All native areas adjacent to turf would be protected from disturbance and left as thick riparian vegetation signed to prevent entry.

Currently all golf course bridges are closed to non-golf public use due to the safety hazard of non-golfers crossing golf play areas. The new bridge would be designed to accommodate two-way traffic, and dispersed recreation access would be planned to allow safe access from local neighborhoods to the river and meadow trails. The trails and golf holes would be designed so that there would be buffer areas between golf play and the path. Pedestrian paths could pass relatively closely behind a tee, but would have a greater buffer distance behind a hole. Additional information related to trail safety is presented below in the discussion of trails.

The four pedestrian/cart path bridges across Angora Creek would be removed and the four cart path bridges across the unnamed creek would remain, but the northernmost would be outside the golf course footprint and used as part of the new recreation path. The recreation bridge may be relocated further downstream to address recreation safety dependant on final design. (The Sawmill Bike Path bridge outside of the study area, next to U.S. 50 would also remain providing auxiliary access across the river.)

**Table 2-4  
Coverage Impacts Summary for Lake Valley State Recreation Area (square feet)**

Land Class	Total Coverage Allowable <sup>1</sup>	2010 Verified Existing Coverage	2010 Verified Banked Coverage	Hard Coverage Proposed <sup>2</sup>	Soft Coverage Proposed <sup>2</sup>	Total Proposed Coverage <sup>2</sup>	Excess Coverage <sup>3</sup>
1a	0	0	0	0	0	0	0
1b	160,889	130,133	30,757	13,319	97,711	111,030	49,859
1c	315,714	141,582	174,132	16,117	44,882	60,999	254,715
2	0	0	0	0	0	0	0
3	109,025	56,365	19,182	5,633	56,365	61,998	47,027
4	0	0	0	0	0	0	0
5	1,311,590	126,344	106,997	34,412	98,794	133,206	1,178,384
6	0	0	0	0	0	0	0
7	0	0	0	0	0	0	0

Notes:

<sup>1</sup> Total Coverage allowed is the amount allowable under either Bailey system or pre-72 grand-fathered, whichever is greater.

<sup>2</sup> Includes existing coverage

<sup>3</sup> Excess coverage available is either that allowed by LCD or that allowed by grandfathered pre-1972 coverage, whichever is greater, and is coverage credit available for future use.

NR = none required.

NI = no impact.

Source: Data provided by State Parks 2011

Other improvements proposed under the Preferred Alternative include construction of golf cart bridges over four small sub-watershed drainages. These include the drainage from the wetland area formed by seepage from the eastern quarry cutslope, two small (5-foot-wide) ephemeral drainages in the southwest part of the proposed golf course area west of the river, and a seasonal drainage in the northern part of the proposed golf course area. An old ditch that diverts the southwesternmost drainage would be removed and that drainage would be restored. The ditch would be filled and revegetated with native seed, and the water redirected into a vegetated swale. Overall, approximately five new crossings of existing surface water drainages or wetlands with short bridges or boardwalks would be required. They would be approximately 10 to 15 feet long and 8 feet wide.

Bridge particulars are discussed in further detail in the River and Floodplain section above.

**Clubhouse, Maintenance, and Parking Facilities**

Under the Preferred Alternative, no changes to the clubhouse or maintenance facilities are proposed. There are currently 115 parking spaces in the paved parking lot at the Lake Tahoe Golf Course. Grassy areas on both sides of the golf course entrance are used for additional parking, and under The Preferred Alternative, the northern half of the unpaved parking area would be paved to create up to an additional 89 parking spaces. Lighting associated with the parking would be designed to match existing lighting, which meets TRPA criteria, and use would continue to be for special events at the clubhouse (i.e., banquets). Additional BMPs including an additional oil separator and slotted channel drains would be incorporated into the existing management system to reduce impacts on water quality.

## Operations and Maintenance

The Lake Tahoe Golf Course would continue to operate from approximately April 15 to November 1 (as weather allows) from dawn until dusk. Golf Course staff needs would increase by four people to a total of 80 employees due to increased maintenance needs. It would continue to host a variety of golf tournaments and outings each year. There is no anticipated change in tournament play frequency and only a modest fee increase of approximately 5% under this alternative. No other increase in fees are anticipated except those that may arise in the normal course of business in accordance with the golf course's business plan and in coordination with State Park's policy to maintain affordable golf. Permitted winter recreational snowmobile activities would continue to occur from November through March on the driving range, and not be allowed anywhere else on the property, except by golf course or State Parks staff members for patrol purposes. The snowmobile operation would continue to be provided by an outside vendor. Lake Tahoe Golf Course would request a review and continuation of its Audubon Cooperative Sanctuary Program certification.

Normal maintenance or future improvements to golf course infrastructure would be implemented by State Parks (the lease holder) or its contracted concessionaire/representative(s). A reduction in infrastructure maintenance is expected under this alternative due to removal of undersized bridges and river restoration efforts.

## TRAILS

Currently all the trails that exist on the west side of the river are casual or volunteer trails. No trails are officially established or designated trails; instead, they have been formed over time through adoption of old roads or routine use, and presumably, trails outside the golf course footprint would continue to be used for the purposes for which they are used today.

Under the Preferred Alternative, a new designated ADA-compliant trail system would be constructed on the east side of the river to tie the informal dispersed recreation trails on the west side of the river across the new bridge and into the bike path. It is the policy of the California Department of Parks and Recreation to provide accessible environments in which all visitors are given the opportunity to understand, appreciate and participate in the State's cultural, historical and natural heritage. Therefore all new construction, renovation or area improvements commencing on State Park property shall be subject to compliance with the requirements of the Americans With Disabilities Act of 1990 (ADA) [Public Law 101-336, commencing at Section 12101 of Title 42, United States Code (and including Titles I, II, and III of that law)], the Rehabilitation Act of 1973, and all related regulations, guidelines, and amendments to both laws, California Government Code Section 4450, et seq., Access to Public Buildings by Physically Handicapped Persons, and Government Code Section 7250, et seq., Facilities for Handicapped Persons, and any other applicable laws. The outcome of all site improvements shall include seamless integration of accessible features to the greatest extent possible.

The recreation trail would share the new bridge with the golf cart path and would then diverge into separate paths on both sides of the river (Exhibit 2-4). There would be two new recreation trails on the east side of the river connecting to the bridge. One would go to the south and tie into the corner of Country Club Drive, while the other would go along the south side of the river to the east and tie into the new Sawmill Bike Path along U.S. 50 near the golf course clubhouse. That trail would cross the unnamed creek on an existing golf course bridge that would no longer be in the reconfigured golf course footprint, but the bridge may be relocated slightly downstream. This trail would also require sections of boardwalk and causeway through the restored floodplain. A new trail would also be constructed around the north end of the western section of the golf course that would allow access across the new bridge. The recreation trail would share the cart path in the central area of the western holes where a gap in the golf course would provide a corridor for other recreation users to pass through to the river and tie into the gravel road which parallels the river. As the draft golf course design indicates, this would occur between holes 7/8 and 12/13 and where the golf course crosses the river at holes 6 and 14. The pedestrian safe zone at the hole 7/8 and 12/13 break is designed to be perpendicular to the golf course to maximize visibility and public safety. A 150-foot buffer is incorporated into the safe zone and would be between a green and a tee box so the public would not

be crossing through the line of play. The buffer would be screened by existing and planted vegetation where visibility is not necessary for safety. Before pedestrians enter into golf course areas along the designated paths, signs would be installed to warn users of potential golfing hazards, and markers would be installed where public trails cross cart paths to direct users. Pedestrians would have the right-of-way to golf carts in all situations and yield signs would be installed along cart paths where public access crossings would occur. Holes 6 and 14, which would parallel the bridge, are designed so that the shot line angles away from the bridge. The bridge area would also be signed and screened as described above. Holes 8, 9, and 13 parallel the STPUD access road. Along this corridor shot lines are angled away from the road and would have a minimum 50- foot buffer between the edge of the turf/rough and the road. This buffer would be screened by existing and planted vegetation. This gravel road is currently, and would continue to be, used by the STPUD as a required maintenance road for its subsurface sewer line in that area. This proposed trail configuration would enable public access and use into and within the area. Interpretive signage would be added in appropriate locations along the new trail system to identify sensitive habitats and restoration improvements.

Trails outside the study area were not addressed in the EIR/EIS/EIS.

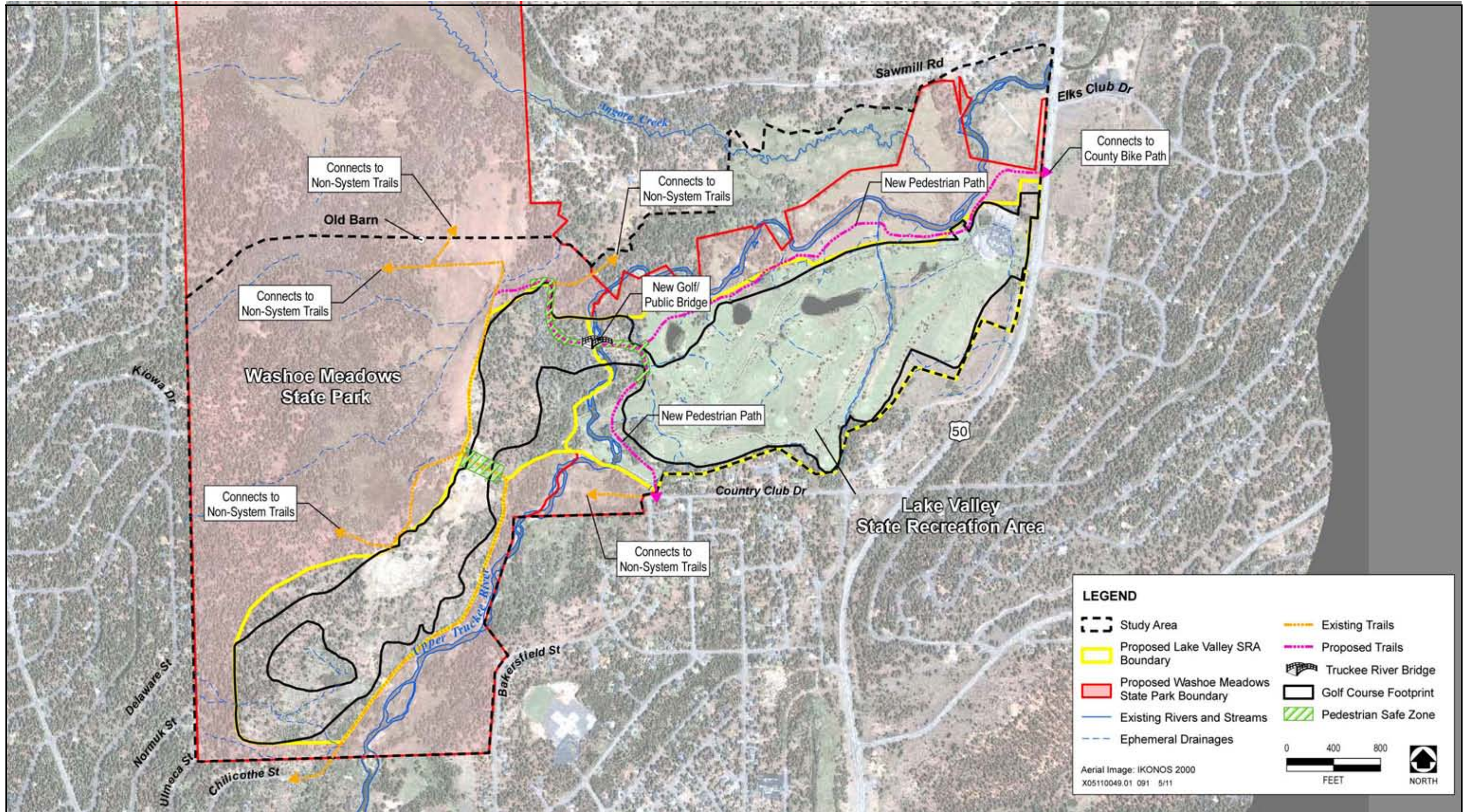
## **INTERIM MANAGEMENT PLAN**

To manage Washoe Meadows SP in a manner consistent with its purpose and to address existing resources, public access, and use issues of this unit, State Parks would prepare and implement an Interim Management Plan (also referred to as an Immediate Public Use Plan). The plan would address resources protection and management, public access, and trails management to protect the quality of important natural and cultural resources and enhance access to the park unit by the public. Natural and cultural resources and trails management would involve normal maintenance and resources protection measures with the performance criterion of meeting the unit's purpose statement regarding resources. Public access provisions would enhance accessibility for the broader public by the addition of trail improvements, signage, one or more, small parking areas on State Parks land within Washoe Meadows SP (e.g., for 2 or 3 cars). The candidate locations would be where public rights-of-way area abut State Parks land. Such public access point(s) would supplement public access to Washoe Meadows SP provided by the proposed bridge across the river near hole 6. Development within the revised boundaries of Washoe Meadows SP is expected to be minimal because the majority of the remaining park area is within sensitive, low-capability land.

### **2.2.2 GENERAL PLAN AMENDMENT**

Implementing the Preferred Alternative would involve revising the park unit boundaries, essentially "shifting" land between Lake Valley SRA and Washoe Meadows SP, and realigning the boundaries between the two park units to make the boundaries more consistent with the management practices and resource values of the two units. The boundaries of Lake Valley SRA would be adjusted to encompass the reconfigured golf course and the existing STPUD access road. The area evaluated for relocation of the golf course (see Section 2.1.2) was selected to reduce the area of the golf course in the 100-year floodplain and SEZ while avoiding impacts to other sensitive resources. The Washoe Meadows SP boundary would be modified to include much of the restored river corridor (historic meander belt), while the Lake Valley SRA boundary would be modified to include the reconfigured golf course, and the primary STPUD access road, thus making the unit boundaries more consistent with the management practices and resource values of the two units. Currently, the northeastern two-thirds of the river in the study area is bounded by golf facilities and is in the Lake Valley SRA, while the southwestern one-third is in Washoe Meadows SP. The revised park unit boundaries, shown in Exhibits 2-1, 2-3, and Appendix K, would place most of the river zone in Washoe Meadows SP. The only section of river remaining in the Lake Valley SRA would be in the vicinity of the new bridge crossing, allowing room for defining the precise bridge alignment during the final design. The area north of the river near Angora Creek would be shifted from Lake Valley SRA to Washoe Meadows SP. The area to which the reconfigured golf holes would be relocated on the west side of the river would become part of the Lake Valley SRA. Revising the park unit boundaries involves amendment of the Lake Valley SRA General Plan, including appropriate text changes, such as revised management policies for the





Source: California State Parks 2011

**Proposed Preferred Alternative: Recreation**

**Exhibit 2-4**



Lake Valley SRA. These changes are presented in Appendix K. The general plan amendment modifies, where necessary, the application of Lake Valley SRA river protection goals and policies to the reconfigured golf course.

The general plan amendment applies to Lake Valley SRA and its new boundaries but does not include plan elements for Washoe Meadows SP. Because no development is anticipated for Washoe Meadows SP, State Parks has not prepared a general plan for this unit. The proposed amendments will be submitted with the completed EIR/EIS/EIS to the State Parks and Recreation Commission for consideration of approval at the conclusion of the environmental review process.

## **2.2.3 PROJECT CONSTRUCTION**

### **CONSTRUCTION SCHEDULE**

The Preferred Alternative construction would be phased over a 3- to 5-year period between May 1 and October 15 (possibly November 1 if weather allows and extension granted) of each year, possibly beginning in 2013. However, construction would not occur on Sundays and may not occur on other designated weekends and holidays. Proposed construction activities scheduled for each year are summarized below (Table 2-3). Access locations, proposed haul routes, and potential storage/staging areas are shown in Exhibit 2-5. Construction hours would be 7:00 a.m. to 7:00 p.m., with hauling restricted to 8:00 a.m. to 6:30 p.m. On occasion, there may be a need for longer work hours to address specific constructability issues that cannot otherwise be accomplished. Such work schedule exceptions would be coordinated with TRPA and El Dorado County, as well as local residents and emergency service providers.

Construction of the Preferred Alternative would commence as soon as possible after completion of construction plans and specifications, project approval, acquisition of permits, securing of funding, and all preconstruction monitoring. Construction activities would be continuous for the multi-year period, with winter closedowns, except for BMP maintenance and monitoring. The construction phasing, equipment, and number of required construction workers for the Preferred Alternative are presented in Table 2-5. However, the final phasing approach may be modified to accommodate needs of State Park, their concessionaire, or the contractor. If possible, Year 1 would focus on construction of the new golf course holes on the western side of the river and the new bridge installation, and the existing golf course would remain open, with minor modifications. Year 2 would involve off-channel work (historic meander modifications and new channel construction). Golf play may be limited to a 9-hole course on the east side of the river to allow for construction access adjacent to the river if the holes on the west side of the river are not adequately vegetated and ready for play. It is anticipated that in Year 2 and 3, most off-channel river restoration work would be completed and vegetation would be allowed to properly establish during this time. Year 3 would include reconfiguring the existing golf course and upgrading irrigation. Year 4 would include removal of old bridges, in-channel work, and connection of historic meanders and new channel sections, if vegetation is established. Pre-wetting of the channels would occur prior to connection with the existing channel sections. The new configuration of the 18-hole regulation golf course would be open to play in Year 4, with possible minor short term modifications to allow for construction access to the river.

### **Preliminary Quantities**

Preliminary quantities of material to be excavated and the cut-and-fill balance for the Preferred Alternative are summarized in Table 2-6. Estimated quantities related to the river restoration are based on the existing and proposed channel dimensions and lengths. At this conceptual stage of design, no adjustments have been made for density or composition of existing materials or compaction requirements of backfill areas. The 18-hole reconfigured golf course design contemplates a minimalist approach to the grading scheme for construction. Only the necessary amount of cut and fill to ensure playability would be undertaken during golf course renovation and reconstruction, and it is expected that all cut and fill would be balanced on-site.

**Table 2-5  
Proposed Preferred Alternative Construction Phasing, Equipment, and Workers**

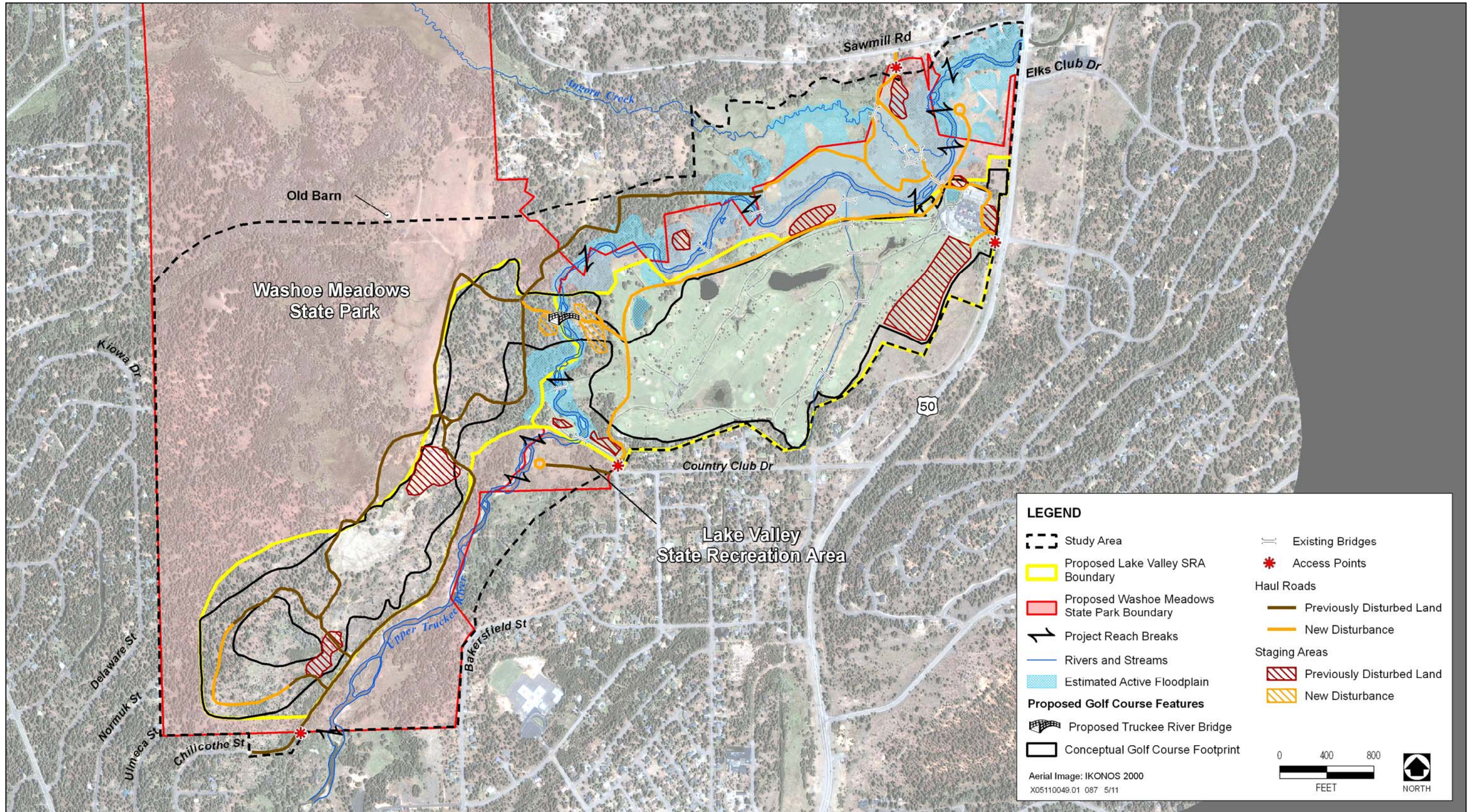
Activity	Duration	Equipment and Workers
<b>Year 1 – New Bridge and Construction of Back 9 (West Side) Golf Course. Modified 18-Hole Course or 9-Hole Course Is Open.</b>		
Mobilization for west side new golf course; Construction of access routes and storage areas; equipment refueling areas, and construction equipment wash area; install temporary BMPs, tree removal and vegetation salvage. Set up temporary or shortened golf holes to allow for safe play	May 15–30	2 equipment transport trucks (1 week), 2 dump trucks, 2 dozers (approx Cat D6), 2 excavators (approx Cat 330), 2 loaders; 2 water trucks, forklift, 1 one-ton pickup truck, 3 chain saws, 1 tub grinder, 1 feller buncher, 1 skidder, 1 log loader, 2 logging trucks workers: 12
Construct west side (back 9) golf course including irrigation, drainage, cart paths, sod or seed, restroom, utility connection, sewerline protection, pond, and permanent BMPs. install 5 foot bridges over ephemeral drainages. Install new bridge over Upper Truckee River.	June 1– September 30	2 excavators (approx. 325 and 330), 2 ten or twenty yard dump trucks , 2 dozers, 2 graders, 2 water trucks, 2 one-ton pickup trucks, 1 scraper, road grader, roller, backhoe, 1 (approx Cat 420E), 2 loaders, 1 forklift (approx Cat TL642), 1 tractor w/box blade & drag mat, 2 trenchers, 2 cranes (2 weeks), 1 pile driver (2 weeks) workers: 20
Install temporary irrigation and winterization measures. Demobilization – removal of equipment from the 100-year floodplain.	October 1–15	1 dozer (approx Cat D6), 1 excavator (approx Cat 330), 1 loader, 1 water truck, 1 one-ton pickup truck, 1 dump truck, 1 tub grinder, 1 hydroseeder, 1 strawmulcher, 2 transport trucks (1 week) workers: 12
<b>Year 2 – Off-Channel Construction and Removal of Golf Course Adjacent to River. Nine Holes of Course Possibly Closed or Possibly Open Newly Constructed Holes to Allow for 18-Hole Course.</b>		
Mobilization for off-channel work. Install temporary BMPs and additional vegetation salvage. Set up eastern staging area.	May 15–30	2 equipment transport trucks (1 week), 2 dump trucks, 2 dozers (approx Cat D6), 2 excavators (approx Cat 330), 2 loaders; 2 water trucks, forklift, 1 one-ton pickup truck, 3 chain saws, 1 tub grinder, 1 feller buncher, 1 skidder, 1 log loader, 2 logging trucks workers: 12
Off-channel work- modify historic meanders and construct new channels including vegetation and bank treatments of those sections. Leave small plugs of existing soil and vegetation where future connection is to be made.	June 1– September 30	2 excavators (325 and 330), 2 ten or twenty yard dump trucks, 1dozer, 2 loaders, 1 water truck, 1 back hoe, 2 one-ton pickup trucks workers: 12
Install temporary irrigation and winterization measures. Demobilization – removal of equipment from the 100-year floodplain.	October 1–15	1 dozer (approx Cat D6), 1 excavator (approx Cat 330), 1 loader, 1 water truck, 1 one-ton pickup truck, 1 dump truck, 1 tub grinder, 1 hydroseeder, 1 strawmulcher, 2 transport trucks (1 week) workers: 10
<b>Year 3 – Off-Channel Monitoring and Construction of Front 9 (East Side) Golf Course. Back 9 Holes Are Open, and Existing Holes to Be Upgraded Are Either Closed or Partially Closed with Temporary Holes Available to Allow for 18-Hole Course.</b>		
Mobilization for modification of eastside golf course. Install temporary BMPs and additional vegetation salvage.	May 15–30	2 equipment transport trucks (1 week), 1 dump truck, 1 dozer (approx Cat D6), 1 excavator (approx Cat 330), 1 loader, 1 water truck, 1 forklift, 1 one-ton pickup truck, 3 chain saws, 1 tub grinder workers: 12
Off-channel work continued and vegetation monitoring. Pre-wet the new (and still isolated) channel segments, using partial diversion of the Upper Truckee River. This step would not disturb the existing channel.	May 15– October 15	2 truck or trailer mounted water pumps, 2 water trucks, 1 one-ton pickup truck workers: 6

**Table 2-5  
Proposed Preferred Alternative Construction Phasing, Equipment, and Workers**

Activity	Duration	Equipment and Workers
Upgrade existing east side golf course and re move section of golf course in floodplain, including removal of existing cart paths, pulverizing or removal of sod, tilling in existing sand. Then localized grading to improve unnamed creek, golf course drainage and raise tees, installation of new irrigation, cart paths, sod or seed, and permanent BMPs.	June 1– September 30	2 excavators (325 or 330), 2 ten or twenty yard dump trucks, 2 dozers, 2 loaders, 1 water truck, 1 back hoe, 1 grader, 1 tractor w/box blade & drag mat, 1 trencher, 2 one-ton pickup truck, 1 forklift, 1 roller workers: 24
Install temporary irrigation and winterization measures. Demobilization – removal of equipment from the 100-year floodplain.	October 1–15	1 dozer (approx Cat D6), 1 excavator (approx Cat 330), 1 loader, 1 water truck, 1 one-ton pickup truck, 1 tub grinder, 1 hydroseeder, strawmulcher, and 2 equipment transport trucks (1 week) workers: 10
<b>Year 4 – In-Channel Work, Removal of Existing Bridges, and Connection of Off-Channel Sections. Reconfigured 18-Hole Golf Course Is Open but May Require Temporary Holes to Avoid Conflict with River Construction.</b>		
Mobilization for in- channel construction activities. BMP and any additional access.	May 15–30	2 equipment transport trucks (1 week), 1 dump truck, 1 dozer (approx Cat D6), 1 excavator (approx Cat 330), 1 loaders, 1 water truck, 1 forklift, 1 one-ton pickup truck, 1 chain saws, 1 tub grinder workers: 10
Continue off-channel work. revegetation maintenance and monitoring. Pre-wet new (and still isolated) channel segments, using partial diversion of the Upper Truckee River. Use this water to flush constructed segments and pump and spray turbid water onto floodplain to infiltrate and water vegetation treatments. This step would not disturb the existing channel.	May 1– October 15	2 truck or trailer mounted water pumps, 1 water truck, 1 one-ton pickup truck workers: 4
Install biotechnical/bank stabilization treatments, woody debris, segment transitions, and armored riffles or gravel in existing channel sections. Reconnect off-channel sections. Excavate and vegetate the inset floodplain. Unnamed creek enhancement and construction of new alignment of the mouth of the unnamed creek with bed-elevation adjustment. Reconfigure lower reach of Angora Creek to adjust for the new confluence with the proposed river channel and its finished bed elevation. Remove existing five bridges on the Upper Truckee River and four bridges across Angora Creek. Floodplain modifications including remove levees and restore floodplain outside of proposed golf course layout. Modify former stormwater pond to create wetland/oxbow feature. Transport material from stockpile storage (and/or import as needed) and backfill to desired level the abandoned sections of the existing channel, including placement/construction of subsoil and addition of soil treatments as needed for groundwater and soil moisture benefits. Apply seed or vegetation transplants and mulch.	June 1– September 30	2 excavators (325 or 330), 3 tenor twenty yard dump trucks, 2 dozers, 2 loaders, 1 water truck, 2 one-ton pickup trucks, 1 backhoe, 1 crane (1 month) 1 roller, 2 truck mounted pumps, hydroseeder (1 month) workers:16
Construct the modified recreation access trail west of the river to tie into the bridge and construct new trail to tie into Country Club Drive corner. Construct the recreation access trail and boardwalk east of the river to tie into the bridge and bike path. Pave parking lot and install permanent BMPs.	September 1– 30	1 loader, 1 excavator, 2 dump trucks , 1 water truck, 1 one-ton pickup truck, small roller & backhoe, paving equipment (asphalt paver, roller, asphalt truck and screed) (1 month) workers: 10

Table 2-5 Proposed Preferred Alternative Construction Phasing, Equipment, and Workers		
Activity	Duration	Equipment and Workers
Install temporary irrigation and winterization measures Remove the temporary disturbances of all access points and staging and storage areas, which includes revegetation activities where needed. Formally demobilize from the site.	October 1–15	1 dozer (approx Cat D6), 1 excavator (approx Cat 330), 1 loader; 1 water truck, 1 one-ton pickup truck, 1 tub grinder, 1 hydroseeder, 1 strawmulcher, 1 ten or twenty yard dump truck, 2 equipment transport trucks (1 week) workers: 12
Year 5 – Work Not Completed In Previous Years Will Be Completed This Year.		
Construction activities would only occur in Year 5 if the condition of revegetation in new channel segments, reconnected meanders, and restored floodplain was not adequate to allow for completion in Year 4. If channel segments were not able to be reconnected in Year 4, those elements would be delayed until Year 5. Year5 activities would commence with mobilization activities and would include the same tasks as listed under Year 4.		
Note: Final phasing approach may be modified to accommodate needs of State Park, their concessionaire, or the contractor as needed.		

Table 2-6 Preliminary Quantities (Cubic Yards) for the Proposed Preferred Alternative		
Treatment Area/Activity	Approximate Cut Volume	Approximate Fill Requirement
New constructed channel	11,000	0
Reconnected historic meanders	8,300	0
Modified existing channel	0	1,000
Boulder steps	4,700	6,200
Armored riffles	8,300	16,500
Other channel bed features	0	0
Existing bank treatments	1,400	0
Proposed bank treatments	2,400	2,400
Inset floodplains	10,800	0
Backfilled channels (assume partial to complete)	0	43,000–58,000
Floodplain fill removal	500	0
Modified unnamed creek	160	90
USGA-approved sand and base	0	7,200
Asphalt	130	180
Baserock	300	430
Sod	7,400	11,200–22,600
Concrete	16	16
Trails	0	9,400
Bridges	5 bridges	1 bridge
<b>Total</b>	<b>62,790</b>	<b>92,000–112,700</b>
Calculations are estimates based on conceptual design and would be modified, as appropriate, during final design. Source: Data prepared by AECOM and Valley & Mountain Consulting 2008.		



Source: Data provided by State Parks in 2011

**Proposed Preferred Alternative: Staging and Access Map**

**Exhibit 2-5**





Several particular river treatments (e.g., boulder steps, armored riffles, rock armored bank, and portions of channel gravel treatments) require specific weight and sized material. For the purposes of traffic evaluations, these materials are not assumed to be available in the on-site excavated materials, but would be brought in from off-site sources. It is possible that some reusable materials would be salvaged on-site, reducing the eventual need for imported material. The USGA-approved sand, and road base or asphalt for new golf cart paths must meet specifications and would be imported. Conversely, existing bank treatments, bridge footings/abutments, and some of the golf course hardscape and sod to be removed may require off-site disposal. Five bridges would be hauled off on five separate flat bed trucks and four bridges would be reused over ephemeral drainages on the west side of the river.

### **Access, Staging, and Storage**

Proposed access points, temporary routes, and staging and storage areas for the proposed Preferred Alternative are illustrated in Exhibit 2-4.

All restoration and golf course reconfiguration construction activities on the southeast side of the river would be accessed through the existing golf course. Street access points could include the golf course entrance off U.S. 50 and the entry off Country Club Drive. Restoration areas north of the river in the downstream half of the study area would be accessed through the existing golf course. Street access points could include the golf course entrance off U.S. 50 or a temporary access off Sawmill Road across public property. Restoration activities in the upstream half of the river and golf course construction on the west side of the river would be accessed through either the Sawmill Road entrance near hole 10, sewer maintenance easements, existing roads and trails in Washoe Meadows SP, and/or the new bridge. Street access to the study area would be provided via Chilicothe Street, Country Club Drive, and the Sawmill Road entrance near the existing hole 10.

Most of the construction area would be accessed through sites already disturbed by golf course grading, sewer line maintenance routes, or other existing trails, cart paths, and roads. Specialized road construction techniques to protect meadows would not generally be required because the existing infrastructure is in place. However, where access roads must cross soft or wet areas or native meadow vegetation, stabilization to protect soils and vegetation and prevent water quality impacts would be required. Where access roads must cross golf course landscaping or infrastructure that would remain in use following project implementation, measures to protect soils, vegetation, and infrastructure would be required.

Temporary access roads would likely be constructed of gravel with road base laid over a temporary fabric barrier. Following construction, roads would be removed and the area restored to preconstruction conditions. Areas would be revegetated or stabilized where needed after use of the roads was completed. Compaction under access roads may occur; therefore, restoration of their footprint areas may require ripping and active revegetation.

Any partial street closures and traffic control would be coordinated with the California Department of Transportation (Caltrans) and El Dorado County Public Works Department, as appropriate. Local residents would be informed of potential traffic controls, closures, or detours at least 48 hours in advance. Adequate emergency access would be provided at all times, and local emergency service providers would be notified of any potential road closures or detours at least 48 hours in advance. Signage on the Sawmill Road Bike Path would be required near the construction entrances on Sawmill Road and north of the golf course entry on U.S. 50.

Construction staging sites would be established in the study area, on previously disturbed land, land slated to be disturbed as part of relocated golf course, and/or high capability land, and would be secured to prevent unauthorized access. Temporary erosion control fencing and (if needed) an approved refueling station would be incorporated into staging areas where appropriate.

Soil would be removed from abandoned meanders, areas of newly constructed channels, reconfigured golf course topography, excavated floodplains, and/or other miscellaneous areas. This material would be stockpiled for placement in the backfilled existing channel. Material would be stockpiled in one of the locations designated in

Exhibit 2-4 for up to three years while soil stabilizes and vegetation along the proposed channel becomes established. At project completion, the stockpile area would be used to backfill sections of the existing channel to be abandoned or contoured to the natural topography of the surrounding area (or integrated into the new golf course landscaping) and revegetated.

Vegetation would also be removed from excavated new channels, reconnected historic meanders, modified existing channel bed and banks, areas of the existing golf course to be reconfigured or retired, areas of the new golf course, and other miscellaneous locations. Plant materials could range widely and would include willows and native sod desired for reuse in the restored areas. Salvageable plant material would be stockpiled until areas are prepared for replanting. Vegetation stockpiling locations would likely be near the river channel, in historic meanders, or in golf course ponds. A temporary plant propagation area where plants would be grown from salvaged materials and/or seed for use on the project may also be designated. Because both native and nonnative materials may be reused in the reconfigured and new golf course areas, no excess plant materials would be expected under the Preferred Alternative.

### **Bridge Installation**

Bridge materials would be staged on the east bank near the installation site, and a smaller staging area on the west bank; both areas would become part of the golf course fairway. Transport of bridge sections from an unloading zone near Country Club Drive to construction staging areas for the bridge would be provided by 40-foot flatbed trailers on a temporary construction road or existing dirt roads. Brushing and grading of a 16-foot road section may be necessary in some locations to allow access. Detours on Country Club Drive would be required to allow a 20-ton tracked crane to stack bridge sections in the staging area.

A pile driver would need to access both sides of the river at 40- by 50-foot construction staging areas. Lengths of 10-inch steel piles would be hammered to a depth of up to 25 feet. Pile clusters would be spaced at approximately 5 feet, three piles for 10-foot widths and five piles for 20-foot widths. Bridge deck supports would be 1-inch-thick steel plates welded to the top of the pile clusters. After the pile foundation is completed, 20-ton cranes would be stationed on both sides of the river to set and connect bridge sections. Bridge installation should be completed within a period of 1–2 weeks.

Four or five existing bridges removed from the existing golf course would be re-used on west side of river over ephemeral drainages.

### **Restroom and Parking Area Construction**

A new 650-square foot restroom facility would be constructed near the new hole 9 on the west side of the river to accommodate both men's and women's restrooms. A connection to the existing power and sewer lines located at Chilicothe Street would be installed. If this site is found to be infeasible during final design the restroom may be relocated near the existing hole 5 as described under Alternative 4 in the draft EIR/EIS/EIS.

The unpaved parking area to the north of the golf course entrance would be paved to create up to an additional 89 parking spaces. Additional BMPs including a separate oil separator and slotted channel drains would be incorporated to existing management system.

## 3 MASTER RESPONSES

The responses presented in this chapter address common environmental issues raised in multiple comments on the August 2010 draft environmental impact report/environmental impact statement/environmental impact statement (EIR/EIS/EIS) for the Upper Truckee River Restoration and Golf Course Reconfiguration Project. They are referred to as “master responses” and are identified by topic so that reviewers can readily locate all relevant information pertaining to an issue of concern. When issues are addressed in the broader context provided by master responses, the interrelationships among the individual issues raised can be better clarified. It is also possible to provide a single explanation of an issue that is more thorough and comprehensive than separate, narrowly focused responses presented without any context. Because it avoids unnecessary repetition of information, use of master responses also streamlines the final EIR/EIS/EIS. Chapter 4 of this document presents the comment letters and responses to specific comments received on the draft EIR/EIS/EIS.

### 3.1 MASTER RESPONSE CATEGORIES

The master responses are organized by environmental topic area and are presented in the following sections of this chapter:

- ▶ Section 3.2, “Land Use”
- ▶ Section 3.3, “Biological Resources”
- ▶ Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality”
- ▶ Section 3.5, “Recreation”
- ▶ Section 3.6, “Cultural Resources”
- ▶ Section 3.7, “Economics”

### 3.2 LAND USE

#### 3.2.1 RESOURCE VALUES OF LANDS BEING EXCHANGED

This master response addresses comments related to the resource values of the lands proposed for exchange between Lake Valley State Recreation Area (SRA) and Washoe Meadows State Park (SP). Comments specifically addressed the existing uses and resource values within the lands to be exchanged. Commenters state that the resource values of lands proposed to be exchanged between the two units under Alternative 2 would not be equal. This section responds to all or part of the following comments: AOB4-1, AOB4-3, AOB4-5, AOB4-6, AOB8-8, AOB8-13, AOB9-2, AOB12-1, AOB13-1, AOB14-1, AOB24-10, AOB30-4, AOB31-2 through AOB31-4, AOB31-17, I6-1, I6-2, I18-1, I50-1, I54-4, I64-22, I160-1, I179-1, I179-10, I186-1, I192-1, I192-4, I192-5, I207-3, I216-1, I217-1, PM1-14, PM2-35.

#### BACKGROUND

As described in the 1984 litigation settlement, the area later designated as Washoe Meadows SP and Lake Valley SRA was slated for development of houses, condominiums, and another golf course. The area encompassed the Upper Truckee River and floodplain, Angora Creek and associated meadows, a fen and surrounding wetland area, as well as other areas of mesic and dry meadow, shrubland, and forest. The area was already altered by river channel straightening and incision, the building of the golf course on the former floodplain between 1958 and 1962, installation of sewer lines and associated roads in the 1960s, gravel mining of two large quarry pits and several smaller ones and construction of associated haul roads, logging and construction of associated roads, a drag strip, a dairy farm, and development of neighborhoods surrounding the property and dissecting Washoe Meadows SP from the Federally owned forestlands. In spite of these impacts, the property was purchased by the Wildlife Conservation Board and transferred to California Department of Parks and Recreation (State Parks) in 1985 (DGS 1986).

Although the golf course was located in former meadows and floodplain directly adjacent to the Upper Truckee River, the existing golf course was an important public recreation facility and the operation was continued as a concession. The area containing the golf course was designated as Lake Valley SRA. The Lake Valley SRA boundary was not delineated based on any scientific or environmental basis; it was intended only to contain the existing footprint of the golf course.

The golf course was built on both sides of the Upper Truckee River in an area where the river valley widened and a large meadow formed along the adjacent lowlands. It includes five undersized bridges and occupies these former floodplain and meadow areas. The lower reach of Angora Creek also flows through the golf course, above the confluence with the Upper Truckee River. The river and meadow habitats have been severely degraded both by historic disturbance and by modern development. A general plan was prepared in 1988 to allow for continued operation of the existing golf course as a concession and to provide guidelines for managing the area, including restoring the Upper Truckee River.

The rest of the property acquired through the settlement was designated as Washoe Meadows SP. The area includes more common habitat areas of upland forest, shrubland, and dry grassy meadows but also less common vegetation/habitat types, such as wet meadow, a fen, and riparian areas. The resource values were described in previous studies, such as the *Lake Country Estates Project Resource Summary* (State Parks 1987), the *Washoe Meadows State Park Resource Inventory* (State Parks 1990), and numerous studies used to define the study area and assist with evaluation in the draft EIR/EIS/EIS. Reaches of the Upper Truckee River and Angora Creek flow through Washoe Meadows SP, and the State Park has areas of wet, mesic, and dry meadow; fen; and forest (Exhibit 3.5-1 in Chapter 5, Revisions to the Draft EIR/EIS/EIS). The areas along Angora Creek and the Upper Truckee River were cited as sensitive resources during the acquisition of the property and were identified as priorities for restoration.

Geomorphic analyses identified the opportunity for restoration and the area needed for restoration of the river and floodplain. Numerous studies were conducted to determine the presence/status of sensitive natural and cultural resources in the two units to determine the EIR/EIS/EIS study area and identify considerations regarding where the golf course could be located. (See Section 2.2, “Alternatives Development,” of the draft EIR/EIS/EIS for additional discussion.) State Parks conducted surveys for northern goshawk, California spotted owl, small mammals, willow flycatcher, migratory songbirds, and bank swallow and also conducted an owl and waterfowl inventory and vegetation mapping. The land capability for the area was verified by the Tahoe Regional Planning Agency (TRPA) (TRPA file number LCAP2008-006). Archaeological studies were conducted for the entire park, and all potentially significant sites were further evaluated, with State Historic Preservation Officer (SHPO) concurrence (Appendix L). Avoiding potential impacts to the historic Celio barn site (associated with the previous dairy) was also considered during planning. This area is located outside of the active construction areas proposed under all alternatives.

Past resource inventories, current studies, and mapping of stream environment zones (SEZs), historic meander patterns, and fens were evaluated to further define the sensitivity of various areas, guiding decisions regarding where portions of the existing golf course could remain and which areas were most suited for relocation (Exhibit 2-1 in the draft EIR/EIS/EIS). Consideration of the areas where the golf course could be sited avoided the wet meadow areas, spring, and fen. Also, the golf course facilities were removed from most areas directly adjacent to the Upper Truckee River and Angora Creek. The area for relocation focused on use of less sensitive lands more distant from the river. The following additional factors also were considered:

- ▶ minimize SEZ area,
- ▶ minimize connectivity and proximity to river,
- ▶ minimize area in 100-year floodplain,
- ▶ avoid impacts to sensitive habitats,
- ▶ avoid impacts to archaeological sites,
- ▶ accommodate dispersed recreation access,
- ▶ maintain connectivity between golf areas, and
- ▶ do not increase the area of golf course turf.

The final layout may be shifted within the proposed SRA boundary if necessary during the final design; however, golf course acreage would not exceed that proposed in the draft EIR/EIS/EIS and presented again in Chapter 2, “Project Description,” of this final EIR/EIS/EIS. These potential changes were considered during analysis of impacts and identification of mitigation measures in the draft EIR/EIS/EIS.

State Parks also considered opportunities for dispersed recreation within the park area and connectivity to regional trails and bike paths, as described in Section 3.8, “Recreation,” of the draft EIR/EIS/EIS and Master Response Section 3.5, “Recreation,” in this document. These resource and recreation considerations led to the proposed configuration of the golf course footprint for the proposed Preferred Alternative.

### **Value of Riparian Areas (Including SEZ, Wetlands, and Wet Meadows)**

SEZ consists of a stream and its drainage, as well as marshes and meadows. Their preservation and restoration is essential to the health of the lake, because they provide natural treatment and conveyance of runoff, which they can reduce by as much as 70% to 90%. SEZs also provide many other benefits. While they comprise only 5% of the land area within the Tahoe Basin, they are key habitat for wildlife, enhance the scenic values of the basin, and provide dispersed recreation opportunities for hikers (California Tahoe Conservancy 2011).

Restoring the watershed and habitat of the Lake Tahoe Basin is critical to the health of the entire ecosystem. Given that 75% of marshes and 50% of meadows in the Tahoe Basin have been altered because of development, extensive restoration is necessary to regain naturally functioning wetlands and soils. Preserving and restoring the Upper Truckee River and wetland continues to be an important priority for the EIP. The river delivers more than 30% of the total water inflow to Lake Tahoe and is the single largest source of sediment flowing into the Lake (TRPA 2007:35–36).

Many projects are addressing the restoration needs of the Upper Truckee River watershed. Stream restoration projects help to increase water table elevations and remove sediment and other suspended particles by slowing the velocity of moving water, decreasing peak flows, and allowing the sediment to settle. Thus, the water quality of the lake can be protected and improved by restoring the natural functions of the rivers and streams in Lake Tahoe’s watershed. The following wildlife habitat values of SEZs are also widely acknowledged:

- ▶ Raptors such as eagles, hawks, and falcons use meadows and wetlands to hunt or forage for prey. Meadows in the basin provide important wintering grounds for resident and migrant bald eagles.
- ▶ Riparian areas provide important migration corridors for large mammals, such as black bear, coyote, foxes, and mule deer.
- ▶ Wetlands, marshes, meadows, and riparian areas provide nesting habitat for raptors such as northern harrier and horned owl; waterfowl such as great blue heron, merganser, mallard, and ring-necked duck; and songbirds such as willow flycatcher, yellow-headed blackbird, evening grosbeak, and yellow warbler.
- ▶ River and stream channel restoration provides greater habitat complexity for native and nonnative game fisheries. Fish rely on channel features such as pools, riffles, instream wood and logs, and undercut banks for food and cover from predators.

Moving the golf course away from the river and decreasing the extent of golf course in SEZ is a critical component to project improvements; however, supporting recreation opportunities is also a goal of the project. Therefore, the project has been designed to balance these goals and thereby meet the mission of State Parks (described further below under Section 3.5, “Recreation”). Furthermore, the Lake Tahoe Golf Course provides affordable golfing opportunities that support tourism and jobs in the local economy and an important revenue source to State Parks.

## Boundary Change Areas

Implementation of the proposed Preferred Alternative would require an amendment to the Lake Valley SRA General Plan to modify the boundary of the SRA. The action would also amend the boundary of Washoe Meadows SP. This boundary change would allow a portion of the existing golf course to be relocated from the less common and more sensitive SEZ, wetland, meadow and riparian lands adjacent to the river to generally more common and less sensitive, previously disturbed, higher capability lands more distant from the river. It would also remove golf course infrastructure from both sides of the lower reach of Angora Creek, allowing a large area to be restored to meadow. The restored area along the river would be transferred from Lake Valley SRA to Washoe Meadows SP, and the relocated golf area would be transferred from Washoe Meadows SP to Lake Valley SRA. The area to be transferred from Washoe Meadows SP consist of much more common vegetation and habitat types of the Tahoe Basin, and much of it has been previously disturbed. The impact on this common vegetation type is less than significant, as discussed further in Master Response Section 3.3, “Biological Resources,” and below. The area in Washoe Meadows SP that would become golf course and consequently part of Lake Valley SRA consists of mainly areas of lodgepole pine and shrubs, dry meadow, and Jeffrey pine.

Implementation of the proposed Preferred Alternative includes relocation of the golf course holes away from the river, which would allow for restoration of critical habitat areas, such as SEZ and riparian habitat areas, whose value to both wildlife and water quality is well recognized. The area in Lake Valley SRA would be restored from primarily golf course turf (perennial nonnative grass) to riparian meadow and floodplain, including 32 acres of SEZ area. Restoration would allow room for a more meandering channel and increased floodplain connectivity, which would restore geomorphic function and critical habitat to an 11,840-foot long reach of the Upper Truckee River, extending it to approximately 13,430 feet.

As described in Section 2.2.1, “Considerations in Definition of the Study Area,” and Section 2.5.1, “Project Features, Golf Course Design Layout,” of the draft EIR/EIS/EIS, areas selected for reconfiguration were chosen to minimize potential golf course impacts on the natural ecosystem while providing a high-quality recreational opportunity, maintaining open space, and preserving the visual and functional quality of the landscape. The reduced effect on the natural ecosystem would be achieved by placing the relocated golf course in relatively open and previously disturbed areas (second- and third-growth forests and former quarries), minimizing golf use adjacent to the river, and maximizing higher capability lands (as defined by TRPA and the Bailey System [Bailey 1976]). The design would incorporate measures to continue Audubon Sanctuary certification through the Audubon Cooperative Sanctuary Program for Golf Courses with ecologically sound land management and the conservation of natural resources.

The reconfigured golf course design concept is intended to make the best use of the site, provide recreation values, and generally avoid the most sensitive areas adjacent to the river while attempting to maintain a buffer (approximately 200 feet) between the golf course and existing houses in the North Upper Truckee neighborhood. A target style golf course is planned under the proposed Preferred Alternative, which involves minimized disturbance through designing with existing topography in mind and placing wider turf areas only in main landing zones so that turf areas are narrower near tees. All turf areas (which are intensively managed) would be buffered using native grasses (which are minimally managed). The existing golf holes would be modified to match this style. Golf course holes remaining on the east side of the river would be reconfigured and upgraded to improve drainage, turf quality, irrigation efficiency, and the water collection system and to incorporate current best management practice (BMP) technology.

As part of this reconfiguration, the unnamed creek crossing the center of the golf course and discharging into the Upper Truckee River also would be modified (e.g., setbacks and buffer areas between turf areas and the creek would be added, and the buffer areas would be planted with native vegetation). All areas where existing golf facilities would be removed within the current golf course footprint would be restored to a native landscape and would be removed from the Lake Valley SRA. These areas would receive minimal grading to restore natural topography and drainage. They would then be planted with native vegetation and managed only for natural values as part of Washoe Meadows SP.

Changes under the proposed Preferred Alternative would include (approximate numbers based on conceptual design):

- ▶ reduction of golf course directly adjacent to the river from 6,382 to 850 linear feet (425 linear feet on each side),
- ▶ net restoration of 23 acres of 100-year floodplain and 32 acres of SEZ area,
- ▶ reduction of golf course in SEZ area from 128 acres to 96 acres, and
- ▶ improved connectivity for wildlife use of the riparian corridor.

The existing golf course is a par 71, 6,741-yard regulation golf course with 98 acres of irrigated, fertilized turf. The proposed golf course would be approximately the same par and yardage, with approximately 85 acres of irrigated fertilized turf. The overall footprint would be approximately 22 acres larger to allow more efficient use of the landscape—specifically, to minimize grading and incorporate buffer areas to treat runoff in the minimally managed areas. The minimally managed areas would remain in native vegetation but would have golf-related uses associated with them, including treatment of runoff, recreation or golf trails, or ponds. They would be managed to limit the vegetation to lower stature native species in many locations.

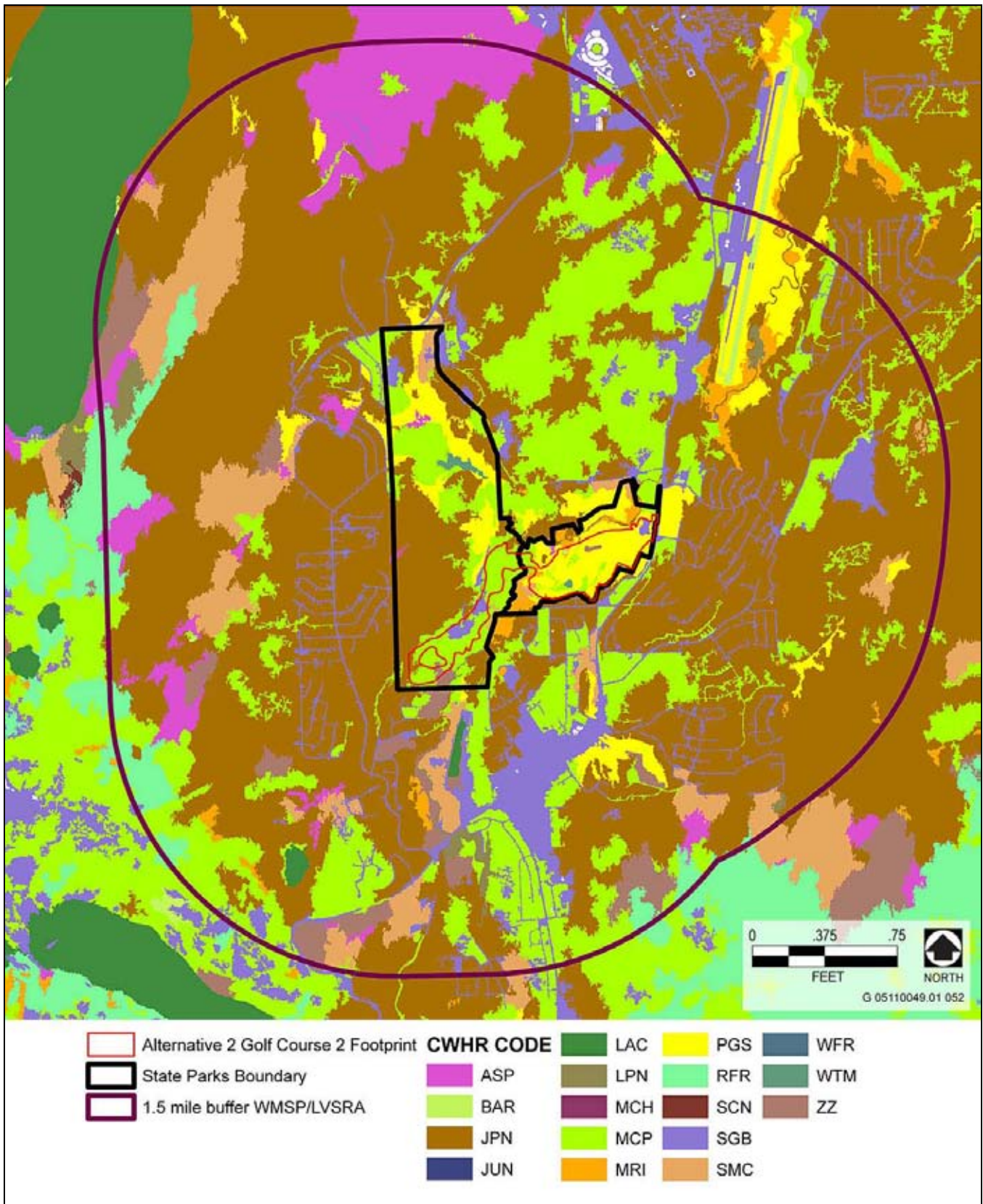
### **Comparison of Habitat Value of Areas Proposed in Boundary Change**

The California Wildlife Habitat Relationships (CWHR) information system was developed cooperatively by the University of California, Berkeley, and the California Department of Fish and Game (CDFG) (CDFG 2011; Airola 1988; USFS 2003). It contains information relating to the habitat preferences of 643 terrestrial vertebrate species found in California, and it allows a user to predict the occurrence and habitat quality for any of these species based on the presence of specific habitat types and habitat elements. The system includes notes for each species regarding life history, legal status, and habitat requirements. It also includes range maps for each species.

The CWHR system, like many other vegetation classification systems, uses a combination of plant species, size, and density to classify habitats. Broad habitat types are based on plant life form: tree, shrub, forb/graminoid, or aquatic. The CWHR system then uses this habitat classification to identify habitat relationships between the vegetation found in an area and the wildlife likely to be found in that area. State Parks used the CWHR geographic information system (GIS) maps to compare wildlife habitat for the area in and around the park units. The results, as discussed below, demonstrate that the reconfiguration area of the golf course includes primarily common, widespread habitat types, whereas the area that would be restored has less common habitat that is more critical to wildlife.

For additional clarification and support of the original findings that the removal of common habitat under Alternative 2 would not constitute a substantial change for or significant impact on wildlife species or wildlife corridors, State Parks conducted an additional habitat analysis using the broad CWHR GIS-based maps presented in Exhibit 3-1. All area calculations were made from the GIS layers and indicate existing conditions. State Parks analyzed the proposed Preferred Alternative golf course footprint, both Washoe Meadows SP and Lake Valley SRA, and the area surrounding the park (a 1.5-mile buffer) to evaluate proposed golf course reconfiguration area as it relates to the surrounding habitat (Table 3-1).

As shown in Table 3-1, more than 50% (5,046 acres) of Washoe Meadows SP and the 1.5-mile buffer area analyzed is composed of Jeffrey Pine (CWHR Type – JPN, CDFG--open Canopy type) and Montane Chaparral (CWHR Type – MCP, CDFG- shrubland type), making up slightly more than 20% of this same area. These two vegetation communities make up nearly three-quarters of the entire area used for the analysis. A visual assessment of the CWHR map for the region shows these vegetation types appear to be consistently common throughout the entire Tahoe Basin.



Source: Data provided by State Parks in 2011

**California Wildlife Habitat Relationship (CWHR) types within Upper Truckee River and Golf Course Reconfiguration Project Area and Vicinity**

**Exhibit 3-1**



<b>Table 3-1 Habitat Types within the 1.5-Mile Buffer of Washoe Meadows State Park and Lake Valley State Recreation Area</b>			
<b>CWHR Type</b>	<b>CWHR Code</b>	<b>Acres</b>	<b>Percent of Total Acres</b>
Aspen	ASP	490.47	5.22
Barren	BAR	17.69	0.19
Jeffrey Pine	JPN	5,046.01	53.72
Lacustrine	LAC	45.42	0.48
Lodgepole Pine	LPN	58.53	0.62
Montane Chaparral	MCP	1,945.77	20.71
Montane Riparian	MRI	83.35	0.89
Perennial Grass	PGS	380.42	4.05
Red Fir	RFR	198.81	2.12
Sagebrush	SGB	642.91	6.84
Sierran Mixed Conifer	SMC	476.34	5.07
Wet Meadow	WTM	7.62	0.08
<b>Total</b>		<b>9,393.34</b>	
Source: Data provided by State Parks in 2011			

Also of interest is that some of the critical sensitive habitats (Montane Riparian – MRI, Perennial Grass – PGS, and Wet Meadow – WTM) combined account for only approximately 5% of the area considered.

Analysis of habitat within the existing State Park boundaries (Washoe Meadow SP, Lake Valley SRA, and areas outside of the study area) yields results similar to the percentages shown in the buffered area described above (Table 3-2). Jeffrey Pine and Montane Chaparral have the greatest areas, making up more than 60% of the existing habitat types. Areas of the Montane Chaparral include lodgepole pine, shrubs, and dry meadow. Within the park boundaries, Perennial Grass (CDFG-Herbaceous vegetation, noninundated) makes up slightly more than 25% of the habitat types. The existing golf course is located entirely within the Perennial Grass habitat type and is composed almost completely of nonnative vegetation, but areas of native grass vegetation are located outside the existing golf course in the units, mostly in dry and mesic meadows. The Wet Meadow habitat type makes up less than 1% and the Montane Riparian less than 3% of the area within the State Parks boundaries. About 40 acres of golf course turf would be restored with native vegetation along the restored river corridor to a combination of Wet Meadow, Montane Riparian, and Perennial Grass (native) habitat types.

Within the proposed Preferred Alternative golf course footprint, Perennial Grass comprises the largest area of existing vegetation (nearly 50%, mostly nonnative turf, including the existing golf course that will remain as turf) (Table 3-3). For areas on the west side of the river under the proposed Preferred Alternative, the golf course would primarily affect vegetation classified as Montane Chaparral, which makes up nearly 40% of the area within the conceptual footprint. Roughly 4 acres of Jeffrey Pine habitat would be affected, which is approximately 2% of the total Jeffrey Pine habitat in the park units. Other habitat areas that would potentially be affected by the golf course on the west side of the river include Sagebrush and a small area of Sierran Mixed Conifer. Thus, common habitat types would primarily be used for golf relocation to restore less common, more critical habitat types.

<b>Table 3-2 Habitat Types in Washoe Meadows State Park and Lake Valley State Recreation Area (including Areas outside of the Study Area)</b>			
CWHR Type	CWHR Code	Acres	Percent of Total Acres
Aspen	ASP	4.63	0.60
Barren	BAR	0.45	0.06
Jeffrey Pine	JPN	267.79	34.58
Lodgepole Pine	LPN	2.91	0.38
Montane Chaparral	MCP	225.54	29.12
Montane Riparian	MRI	20.45	2.64
Perennial Grass	PGS	197.62	25.52
Sagebrush	SGB	24.80	3.20
Sierran Mixed Conifer	SMC	22.69	2.93
Wet Meadow	WTM	7.62	0.98
<b>Total</b>		<b>774.50</b>	
Source: Data provided by State Parks in 2011			

<b>Table 3-3 Existing Habitat Types in the Proposed Preferred Alternative Golf Course Footprint</b>			
CWHR Type	CWHR Code	Acres	Percent of Total Acres
Barren	BAR	0.45	0.30
Jeffrey Pine	JPN	4.21	2.78
Montane Chaparral	MCP	58.93	38.92
Montane Riparian	MRI	1.40	0.92
Perennial Grass	PGS	73.34	48.43
Sagebrush	SGB	11.21	7.40
Sierran Mixed Conifer	SMC	1.02	0.67
Wet Meadow	WTM	0.86	0.57
<b>Total</b>		<b>151.43</b>	
Source: Data provided by State Parks in 2011			

### 3.2.2 CONSISTENCY WITH APPLICABLE PLANS, POLICIES, AND REGULATIONS

This master response addresses comments on the draft EIR/EIS/EIS related to the consistency with plans, policies, and regulations applicable to the exchange of land between Lake Valley SRA and Washoe Meadows SP. Comments specifically addressed the consistency of the proposed land exchange with the 1984 litigation settlement agreement, the California “urgency statute,” public resources codes, the Washoe Meadows SP purpose statement, State Parks policies, State Parks’ *Planning Handbook* and *Lake Valley State Recreation Area River Management Plan—Upper Truckee River* (River Management Plan), the definition of a State Park, and SRA policy. This section of this master response responds to all or part of the following comments: AOB4-3, AOB8-8,

AOB8-11, AOB8-22, AOB24-2, AOB24-4, AOB29-1, AOB30-1, AOB31-2 through AOB31-8, AOB31-14, AOB31-15, AOB-31-21, I6-1, I6-2, I7-1, I10-2, I18-1, I50-1, I54-4, I55-1, I64-1, I64-11, I64-15, I64-16, I64-22, I111-4, I157-18, I160-1, I161-1, I165-1, I174-1, I179-10, I188-1, PM1-14, PM1-20, PM2-63.

## CONSISTENCY WITH 1984 SETTLEMENT AGREEMENT

Commenters state that Alternative 2 would not conform with the 1984 settlement agreement and cite language related to the unique characteristics of the property and the presence of rare eastern brook trout habitat. (See the response to comment I64-5 for a discussion of eastern brook trout.) Commenters also state that the decision to continue operation of the golf course may contradict the 1984 settlement agreement. The wording in the settlement agreement being referred to is contained in what is commonly called a “recital clause” or “recital.” A recital clause can be included in any agreement and is often preceded by the word “whereas.” Recitals represent an expression of intent in a “whereas” clause of an agreement.<sup>1</sup>

In general, recitals are not legally binding. Recitals can be included for a number of reasons. They can be included to provide context for the agreement, such as the legal relationship of the parties and the background facts that gave rise to the agreement. Recitals are not considered an operative part of the agreement.<sup>2</sup> For instance, in *Emeryville Redevelopment Agency v. Harcros Pigments, Inc.* (2002) (101 Cal. App. 4th 1083), the court found that the recital in question “was not a contractual undertaking but a declaratory statement on a matter of no apparent consequence as between the signatories.” The law has long distinguished between a “covenant,” which creates legal rights and obligations, and a mere “recital,” which a party inserts for his or her own reasons into a contractual instrument. Recitals are given limited effect even between the parties to the agreement. The recital here does not even concern a matter of *fact* but states at most the *opinion* of one or both parties that one part of the property is more valuable than the other” (italics in original).<sup>3</sup>

Therefore, the assertion that the EIR/EIS/EIS does not conform to the language of the settlement agreement is unfounded, as the recital clauses cannot be relied on to determine the intent of the settlement agreement. The settlement agreement addresses the transfer of property from Lake Country Estates, Inc., to State Parks and addresses property in both Lake Valley SRA and Washoe Meadows SP. The recitals concern the opinions of some or all of the parties.

In addition, the subsurface stream that provides eastern brook trout habitat described in the settlement agreement flows northeast out of the fen. Both the fen and the stream are upgradient and outside of the project area. As described further in Master Response Section 3.3, “Biological Resources,” and Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” neither would be affected by implementing any of the alternatives. One of the outcomes of implementing the project would be to improve the Upper Truckee River ecosystem, including fish habitat.

## CONSISTENCY WITH CALIFORNIA STATUTE OF 1984, CH. 1470 SEC. 3

Commenters state the project is inconsistent with the “urgency statute” (California Statute of 1984 CH. 1470 SEC. 3). This legislation was used to allocate funding to purchase the property at issue. Such legislation is traditionally carried in an urgency bill because it involves property and money and because there is no need to wait for the statute to take effect in the next calendar year, as most statutes would. The basis for the urgency status is often stated in somewhat hyperbolic terminology to justify the purchase of property. It does not provide substantial evidence of the reason for the purchase by itself. The statute also says that “the property shall be

<sup>1</sup> *Genovese Drug Stores, Inc. v. Conn. Packing Co.* (1984) 732 F.2d 286, 291.

<sup>2</sup> *Jones Apparel Group, Inc. v. Polo Ralph Lauren Corp.* (2005) 791 N.Y.S.2d 409, 410; *Trump Village Section 3, Inc. v. New York State Housing Finance Agency* (2002) 739 N.Y.S.2d 37, 38; *McDonough v. Chu Chew Shong* (1937) 21 Cal.App.2d 257, 259; *County of Los Angeles v. Farnsworth* (1935) 4 Cal.App.2d 516, 522; *Ross v. Ross* (1931) 253 N.Y.S. 871, 872.

<sup>3</sup> *Emeryville Redevelopment Agency v. Harcros Pigments, Inc.* (2002) 101 Cal. App. 4th 1083, 1101

operated and maintained by the Department of Parks and Recreation in a manner which promotes its environmental *and recreational* values. In addition, the land use designation by the TRPA classifies this area as a stream environment zone (SEZ) and encourages its management ‘for outdoor recreation and natural resources values to include opportunities for SEZ restoration’”. State Parks is balancing the dual goals of (1) facilitating the operation of the golf course, which provides a uniquely affordable opportunity for play on a regulation golf course for residents and visitors in the South Lake Tahoe area, and (2) restoring the stream environment of the Upper Truckee River, both of which are consistent with the statute, settlement agreement, and regional and local land use plans and policies.

## **CONSISTENCY WITH CALIFORNIA PUBLIC RESOURCES CODE**

As described in the following subsections, commenters state that the project would be inconsistent with various sections of the California Public Resources Code.

### **Section 5001.9**

Commenters state that the project would be inconsistent with PRC Section 5001.9 because no part of Washoe Meadows SP may be used for any use other than open space. Assigning and changing classifications is the role of the State Park and Recreation Commission. A golf course would not be built in Washoe Meadows SP. A portion of land (80 acres) would be transferred to Lake Valley SRA. An approximately corresponding amount of acreage (68 acres) currently in Lake Valley SRA would be transferred to Washoe Meadows SP. This transfer would be one of the actions recommended to the commission for final action.

### **Section 5002.1**

Commenters state that the project would be inconsistent with PRC Section 5002.1 because the inventory prepared for the properties would need to be updated before the property is reclassified. The original inventory covered the entire 777-acre property (the study area occupies only 520 acres). The Lake Valley SRA designation applies to approximately 170 acres, or approximately 20% of the property, and the golf course covers 134 acres, less than 17 % of the original land covered by the settlement agreement. The relocation of a portion of the golf course west of the river constitutes approximately 10% of the total 777 acreage. The original inventory is consistent with existing conditions, and an updated inventory is not necessary to implement the project.

In addition, numerous studies were conducted to determine the presence/status of sensitive natural and cultural resources in Washoe Meadows SP and Lake Valley SRA before the EIR/EIS/EIS study area was identified and before consideration was given to where the golf course could be located to minimize potential impacts. Surveys were conducted for northern goshawk, California spotted owl, small mammals, willow flycatcher, migratory songbirds, and bank swallow, and an owl and waterfowl inventory and vegetation mapping also were conducted. The land capability for the area was verified by TRPA (TRPA file number LCAP2008-006). Archaeological studies were conducted for the entire park, and all potentially significant sites were further evaluated, with SHPO concurrence (Appendix L).

### **Section 5002.2**

Commenters state that the project would be inconsistent with PRC Section 5002.2 because no changes to the land uses can be made unless a general plan is prepared. State Parks acquires, in many different ways, many acres of land that have many different values. After the property is acquired, State Parks must manage the land in accordance with the agency’s mission. That may mean folding a new acquisition into an existing park unit or leaving it as a stand-alone park. It may include dividing the property into various parts to manage the land most appropriately. Section 5002.2 does require the preparation of a general plan before “development.” However, with the boundary change that would be implemented as part of the proposed Preferred Alternative, no development would occur in an area without a general plan. The boundary of Lake Valley SRA would be modified to include

the new development associated with reconfiguration of the golf course. A general plan that addresses recreational use associated with the golf course has already been prepared for Lake Valley SRA.

In this case, State Parks has evaluated the relative values of the land contained in the Lake Valley SRA and Washoe Meadows SP. State Parks believes that an exchange of land between Washoe Meadows SP and the Lake Valley SRA would facilitate the reconfiguration of the golf course without damage to Washoe Meadows SP and that it would support restoration of the stream. The values of the lands exchanged between the units are discussed in more detail above. However, State Parks is not required to prepare a general plan for a park that is not slated to have any development as a result of this decision.

### **Section 5019.53**

Commenters state that Washoe Meadows SP was purchased because it contains many important historical, archaeological, ecological, and geological properties and values and that fragmenting the park would be inconsistent with PRC Section 5019.53. The resource inventory indicates that Lake Country Estates (Washoe Meadows SP and Lake Valley SRA together) makes up less than 1% of the Lake Tahoe watershed. The area to be transferred from Washoe Meadows SP to Lake Valley SRA is described in that document as primarily middle mountain forest biotic community, dominated by lodgepole pine and Jeffrey pine, which is heavily represented in other public lands in the area. As discussed above, most of the area in Washoe Meadows SP to be transferred to Lake Valley SRA is classified as the Montane Chaparral type (consisting mostly of lodgepole pine), which occupies approximately one-third of both park units. This forest-dominated habitat type is far more common in the Tahoe Basin, whereas the wet meadows and riparian areas are much less widespread, have been more heavily affected by development, and are widely recognized as critical habitat for many species.

As described in Master Response Section 3.6, “Cultural Resources,” the Washoe Indian cultural and historical sites would be protected, and the Celio ranch (old barn) is located outside the study area. Areas with rare plants, fens, and springs have been avoided, or mitigation has been added to the project to protect those specific resources, and extensive wildlife habitat suitable for rare and endangered species is still available and would benefit from the project, as described further in Master Response Section 3.3, “Biological Resources.” The riparian corridor along the Upper Truckee River would be more continuous, with a shift from the current 6,382 linear feet of golf course directly adjacent to the river to 850 linear feet under the proposed Preferred Alternative. The stream habitat that would be transferred to Washoe Meadows SP has a higher habitat value based in the CWHR system than the Middle Mountain Forest, which is a common habitat in the Lake Tahoe area.

### **Section 5019.56**

Commenters state that the project would be inconsistent with PRC Section 5019.56 because state recreation areas are not intended to include lands with significant ecological, geological, scenic, or cultural resource values. As part of implementation of the proposed Preferred Alternative, lands incorporated into the golf course would become state recreation area. Lands outside of the golf course footprint would be designated as state park. See the discussion of “Habitat Values of Lands Being Exchanged,” above for more detail.

## **CONSISTENCY WITH WASHOE MEADOWS STATE PARK PURPOSE STATEMENT**

Commenters state that Alternative 2 would not be consistent with the Washoe Meadows SP purpose statement because it states that the park was acquired to preserve and protect the wet meadow area. As discussed previously, the golf course was approximately 134 acres of the total 777 acres purchased by State Parks under the settlement agreement, which is approximately 20% of the total. The amount of land that would be needed to restore the Upper Truckee River to its pre-1940s configuration and relocate the golf course is approximately 90 acres of the current Washoe Meadows SP. Much of the restored river area and surrounding active floodplain( approximately 40 acres) would be added back to Washoe Meadows SP. This riparian habitat type is considered more sensitive and limited in the Tahoe Basin than the Jeffrey and Lodgepole habitat types that would be converted to golf

course. This exchange is also more consistent with the wetlands and open meadows of Washoe Meadows SP. See the previous discussion regarding habitat values of lands exchanged between the two units.

Also note that the original 2000 Statement of Purpose for WMSP referred to “an exceptionally large specimen of lodgepole pine”. Since that time, the tree died and fell as a result of natural processes.

## **CONSISTENCY WITH STATE PARKS POLICIES**

### **Policy I.1, 2005 California Recreation Policy**

Commenters state that allowing golf course holes to remain near the river would be inconsistent with Policy I.1, which calls for management actions that strive to correct problems that have the potential to damage sensitive areas. The purpose of the project is to correct a long-standing problem related to land use disturbance of the stream channel and floodplain and to continue recreational opportunities. The project would be consistent with this policy because it would be striving to correct problems that are degrading the sensitive habitat along the Upper Truckee River.

### **Policy II.1, Integrity of State Park System Lands**

Commenters state that the project would be inconsistent with Policy II.1 because it would involve changing land uses in the park units. As described in Policy II.1, acquired land is subject to the provisions of law and to general policy established by the State Park and Recreation Commission. In addition, Policy II.1 states that the director of State Park and Recreation Commission shall, whenever possible, provide for the use of State Park System lands as classified and planned and shall not grant nonconforming uses without the concurrence of the State Park and Recreation Commission. Policy II.1 does not discourage changes in land use of lands managed by State Parks. The transfer of land between the two parks and the general plan amendment are described on page 2-56 of the draft EIR/EIS/EIS. As described in the draft EIR/EIS/EIS, only the State Park and Recreation Commission can process a classification or reclassification and approve a general plan or amendment. This is consistent with Policy II.1.

Although approximately 90 acres of Washoe Meadows SP would be transferred to Lake Valley SRA, 40 acres of land (adjacent to the river) would be transferred to Washoe Meadows SP from Lake Valley SRA.

### **Policy II.2, Classification and Naming Units, Features, Groves, and Trails of the State Park System (Amended May 4, 1994)**

Commenters state that the wording of Policy II.2 indicates that the classification and naming process of the State Park System results in a permanent name and classification for a park unit. The only reference in this policy to the idea that a classification never changes is the word “permanent”; however, this reference is not intended to mean that the classification never changes. Instead, it is a reference to the fact that units often come with a name or acquire a temporary name before they have a permanent name. The permanent name is used in part to identify the nature of the park. The reference to “permanent name” does not necessarily mean that unit classifications or names would never change. Management of park units should remain flexible. If a classification needs to change, it can be changed through the State Parks and Recreation Commission approval process.

### **Policy II.4, Preservation of Vegetative Entities**

Commenters state that Policy II.4 indicates that State Parks should acquire and preserve outstanding examples of native California species. They state that the project would be inconsistent with this policy because implementing the project would result in potential impacts on the sensitive species associated with the fen in Washoe Meadows SP. This policy refers to the integrity and diversity of plants and the replacement of those plant communities from similar genetic stock. As discussed on page 2-35 in Chapter 2, “Project Description,” existing plants from the area would be “stockpiled” for replacement use. As discussed previously, the habitat that would be transferred to

Washoe Meadows SP is actually more similar in value (mostly riparian) to most of Washoe Meadows SP than the area that is being transferred to Lake Valley SRA from Washoe Meadows SP (upland previously disturbed second- and third-growth forest habitat). The Jeffrey/lodgepole pine community is not a unique community for this area. See the vegetation map and previous discussion.

The fen at Washoe Meadows SP is classified as a sloping fen (also called soligenous peatland). Sloping fens occur in valley bottoms where alluvial groundwater supports peat formation or at the base of slopes where groundwater discharges to the surface as a result of either a break in the topography or a change in geology (Weixelanm and Cooper 2008). This fen type is the most common type of fen in the Sierra Nevada and is usually underlain by springs or a complex of groundwater discharge points. The fen is located outside and upslope of the potential golf course relocation site (Exhibit 3.5-1, Chapter 5 of this document). Choosing a golf course relocation site that is downslope of the fen complex would avoid impacts on or degradation of the fen. (See Master Response Section 3.3, “Biological Resources,” and Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for additional discussions.) The quarry floor, where seepage from the fen drains from the quarry cut-face, collects water and has begun to form a small wetland, potentially a vernal pool. This area has little soil (all of the original soil was removed during sand-gravel extraction) and has no peat. Although Alternative 2 originally was designed to enhance this area, it was never part of the proposed golf course footprint. The proposed Preferred Alternative now would completely avoid this area.

### **Policy II.5, Wildlife Management in Units of the State Park System**

Commenters state that the project would be inconsistent with Policy II.5 because reconfiguration of the golf course would not protect native wildlife in a natural status within State Park System unit boundaries and quote language from the policy. The policy states that:

The purposes of the State Park System include protection of native wildlife in a natural status within State Park System unit boundaries; therefore, programs of wildlife management involving the introduction and propagation of missing species or the reduction of existing species population may be undertaken only after careful study of the effect of such management on the ecological stability of the area and approval of the management program by the Commission.

In fact, this project meets multiple aspects of the mission of State Parks because it addresses the need to provide for high-quality recreation and to protect natural resources:

The mission of the California Department of Parks and Recreation is to provide for the health, inspiration and education of the people of California helping to preserve the state’s extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.

Therefore, transformation of parkland to golf landscape is not counter to the purpose of this policy or the mission of State Parks because transformation of parkland to golf landscape would occur only to allow the restoration of the Upper Truckee River. The proposed Preferred Alternative involves reconfiguring an existing golf course; therefore, there would be no increase in turf area.

Restoration of the river would increase the “protection of native wildlife in a natural status within State Park System unit boundaries” by increasing the amount of riparian habitat in the Lake Tahoe Basin. The river corridor is known to support sensitive wildlife species and has the potential to support many more (and therefore increase diversity and abundance) if restored. The golf course turf is not a barrier to wildlife movement, as discussed in Section 3.5, “Biological Resources,” of the draft EIR/EIS/EIS and in Master Response Section 3.3, “Biological Resources.” American robins and other native bird species forage on the golf course. Mammals such as coyotes and bears cross and move along golf course turf. River restoration such as that proposed under the proposed Preferred Alternative should increase the diversity and abundance of wildlife in the area.

Further, riparian areas have an intrinsic habitat value for diverse species and help to maintain ecological connectivity across the landscape. It has been determined that maintaining and enhancing riparian corridors and aquatic systems in California would greatly enhance overall ecological connectivity throughout the state and should be a focus of regional plans (Spencer et al. 2010).

### **Policy III.1, Planning**

Commenters state that this policy indicates the importance of determining the extent of need for recreation in the context of long-range objectives. Commenters state that State Parks periodically conducts surveys to determine recreational trends and that these surveys show a decline in golf, which is counter to implementation of the proposed Preferred Alternative. Appendix E, "Lake Tahoe Golf Course Economic Feasibility Analysis," to the draft EIR/EIS/EIS acknowledges that the Lake Tahoe Golf Course has experienced declining gross revenues since 1997. However, there has also been a corresponding decrease in tourism throughout the Tahoe Basin and entire region. See Section 3.5, "Recreation," for a discussion of recreational uses of the study area.

### **Policy III.6, Development of Facilities within State Parks and State Seashores**

See the previous discussion of consistency with the settlement agreement.

### **Policy III.7, Conflicting Recreational Use**

Commenters state that the project would be inconsistent with Policy III.7 because it states that recreational uses that are damaging to sensitive resources should be reconsidered. The purpose of the project is to correct existing and ongoing damage to the Upper Truckee River related to the golf course. The project would be consistent with this policy because it involves reevaluating the recreational use causing the damage to the river, repairing the damage to the river, and reducing further damage.

### **CONSISTENCY WITH STATE PARKS PLANNING HANDBOOK AND RIVER MANAGEMENT PLAN**

Commenters state that the boundary exchange would be inconsistent with the statement in the *Planning Handbook*, an internal administrative guide for planning management, that area boundaries need to encompass the significant resources and provide an adequate buffer from adjacent land uses. They also state that the project would be inconsistent with the *Planning Handbook* because haul routes and construction areas are not considered in the boundary exchange and proposed parking facilities would be inconsistent. In addition, commenters state that the project would be inconsistent with the draft River Management Plan for the study area and that the *Planning Handbook* states that specific project plans should not proceed until a management plan in place.

State Parks has proposed shifting the boundaries between the Lake Valley SRA and Washoe Meadows SP to allow for the restoration of the Upper Truckee River. To take the golf course out of the original channel of the river but still continue to offer the recreational opportunities of the existing 18-hole golf course, State Parks would move the boundaries of the two classifications to allow the transfer of river-related habitat currently in Lake Valley SRA to Washoe Meadows SP, which has habitat similar in value to the meadows and water-related areas. In turn, forested and dry meadow land in Washoe Meadows SP that is not unique to the area would be used to accommodate a relocation of a portion of the golf course away from the river channel. The boundary was based on the existing footprint of the golf course, not on resource values. Since that time, State Parks has learned more about the resources, land values, and the importance of restoring the Upper Truckee River.

The *Planning Handbook* does not address the type of action proposed at Lake Valley SRA and Washoe Meadows SP, so the action cannot be portrayed as being contrary to the handbook. The *Planning Handbook* provides general guidance and does not address all areas of park planning management.

The haul route on the west side of the river would be located along existing gravel and dirt roads (Exhibit 2-7 in the draft EIR/EIS/EIS and Exhibit 2-5 in the final EIR/EIS/EIS), which provide access for South Tahoe Public



Utility District (STPUD) sewer line maintenance, as well as for State Parks resource management and patrol access. These are existing roads, and construction use would be temporary. (Note: State Parks also included the southern portion of that road in the area that would be moved into the SRA, as shown in Exhibits 2-1 and 2-3 in the final EIR/EIS/EIS.) Therefore, these areas were considered when determining the boundaries proposed to be exchanged.

Commenters state that proposed parking facilities in Washoe Meadows SP would be inconsistent with the *Planning Handbook*. The “parking facilities” consist of space for one, two, or three vehicles and possibly a portable toilet. These facilities would not be permanent and would not constitute development. No infrastructure would be put in place, and the parking and sanitary facilities could be removed at any time. Furthermore, the areas considered for parking facilities are currently used for these purposes and these facilities would assist in protection of natural resources in these areas with BMPs.

Commenters reference consistency with the Specific Project Plan, detailed on page 155 in the Planning Handbook. Specific Project Plans are the detailed implementation plans to accomplish specific projects or management plans. For example, this is the guidance State Parks would use for a project such as a visitor’s center, which would be preceded by an interpretive management plan. A Specific Project Plan has not been prepared for this project: it is not the type of project that would be implemented under a Specific Project Plan. Preparation of a detailed plans and specifications will occur once the CEQA process is completed, and these are the project plan for implementation. Although it is a complex project in terms of the restoration aspects, it is not a complex project “development wise” such as a visitor’s center that would involve a number of different divisions, and the tasks of sighting and building construction. Natural area restoration is a standard project for State Parks and the plans for implementation are not referred to as specific plans.

Management plans are not publicly adopted documents that go through a comment and response process. They are internal documents used to guide activities carried out by State Parks staff. If such plans trigger actions that could cause changes in the physical environment sufficient to require review under the California Environmental Quality Act (CEQA), then the CEQA process is implemented. State Parks started with the need to restore the river while maintaining recreational uses that are currently provided in the study area. The staff developed several alternatives that could be considered. Because of the need to prepare both an EIR and an EIS, the alternatives were presented without reference to a preferred project or any approval of actions leading to any change in the physical environment. One of the reasons why CEQA has an exemption for feasibility studies is so a project proponent has an opportunity to plan its course of action (see State CEQA Guidelines Section 15262).

### **CONSISTENCY WITH STATE PARK DEFINITION**

Commenters state that construction of a golf course in Washoe Meadows SP is inconsistent with the definition of a State Park. State Parks is not proposing construction of a golf course in a State Park. The proposed Preferred Alternative proposes a boundary modification for both Washoe Meadows SP and Lake Valley SRA, as well as a general plan amendment for Lake Valley SRA, to accommodate the restoration of the river and subsequent relocation of portion of the golf course. The proposed Preferred Alternative would be implemented only with the boundary modifications and general plan amendment that would ensure that the entire golf course would be located completely in Lake Valley SRA. Golf courses are consistent with the state recreation area land use designation.

### **CONSISTENCY WITH SRA POLICY**

Commenters state that the project would be inconsistent with the Stream Management Sensitivity Zone policy that calls for restoration of the natural stream configuration. Commenters state that the Lake Valley SRA General Plan was implemented to increase the Stream Management Sensitivity Zone to more than 70 acres. The increase in the zone to more than 70 acres described in the Lake Valley SRA General Plan included the proposed acquisition of approximately 67 acres; thus only restoration of 3 acres is actually described. The additional 67 acres was never acquired. Implementing the proposed Preferred Alternative would return the Upper Truckee River to a more

natural stream configuration and would increase the Stream Management Sensitivity Zone acreage by 32 acres. It would not preclude additional acquisitions in the future from willing sellers. Increasing the acreage of the Stream Management Sensitivity Zone would further the policies in the Lake Valley SRA General Plan.

### 3.3 BIOLOGICAL RESOURCES

#### 3.3.1 BASELINE CONDITIONS USED IN THE ENVIRONMENTAL ANALYSIS

This master response addresses comments on the draft EIR/EIS/EIS related to the selection and use of a “baseline.” Comments specifically addressed the selection and description of a baseline for evaluation of impacts related to upland habitat that would be converted to golf course features under Alternative 2. Commenters state that the baseline used in the draft EIR/EIS/EIS is inadequate and therefore that impacts of the project were not evaluated adequately. This section of this master response addresses general comments made on the adequacy of baseline information presented in the EIR/EIS/EIS and responds to all or part of the following comments: AOB2-7, AOB8-16, AOB9-2, AOB24-8, AOB30-3, AOB30-21, I23-1, I23-3, I70-1, I82-2, I82-4, I192-5 I238-5, PM1-14.

A primary purpose of an EIR/EIS/EIS is to inform decision-makers and the public about the potential environmental impacts of a project. The impacts of a project are evaluated based on the direct and reasonably foreseeable indirect physical changes in the environment that may be caused by implementing the project (either on a project-specific basis or in a cumulative context), and the setting or environmental baseline provides the starting point for that analysis. In the biological resources section, the current “baseline” conditions are a reflection and culmination of historical and existing and ongoing activities that affect a specific resource, and the true baseline condition is often a dynamic range of conditions. The setting describes terrestrial and aquatic habitats located in the study area, along with the potential for special-status plant and animal species to occur in these areas. The characterization of the existing setting is drawn from literature and database searches, analysis of aerial photographs, consultation with biological resource agencies, and field surveys. Establishing a proper baseline is not limited to a snapshot in time but relies on a wide range of resource information gathered over time (in many cases, decades) to fully understand the environmental context. Here, the current baseline conditions have been described to provide a clear context for understanding and evaluating project impacts.

Most of the comments related to the baseline conditions were directed toward the characterization of upland habitat that would be converted into golf course features under Alternative 2. Habitat that would be removed under Alternative 2 is described Section 3.5, “Biological Resources,” of the draft EIR/EIS/EIS; the section “Wildlife Habitat Functions” (pages 3.5-17 through 3.5-21) describes wildlife that could occur in habitat proposed for golf course development under Alternative 2 and describes habitat features important for those species. For example, the draft EIR/EIS/EIS states that the conifer forest in the study area “supports a variety of birds, such as woodpeckers, nuthatches, and kinglets; it also provides suitable roosting habitat for common bat species. This habitat type provides perch sites for raptors such as red-tailed hawk (*Buteo jamaicensis*) and Cooper’s hawk (*Accipiter cooperii*) that use meadow areas for foraging” (page 3.5-18). The section goes on to describe how “snags and downed logs, common in lodgepole pine forests in the study area, provide structure for wildlife resting, nests, and dens” and that “in some locations near the river, an understory of riparian shrubs is present, providing further habitat structure for wildlife” (page 3.5-18). This description provides a picture of existing wildlife habitat and is consistent with the intent of creating an accurate baseline for evaluation of impacts.

Comments expressed disagreement with statements in the draft EIR/EIS/EIS that qualified habitat based on historical or current disturbance. In the discussion of impacts under Alternative 2 on resources that may be present in upland habitat (Impact 3.5-9 [Alt. 2]), the draft EIR/EIS/EIS states that “upland habitat in the proposed golf course relocation area is presently degraded and experiences relatively high levels of disturbance from use of volunteer trails by bicyclists and pedestrians (and dogs), and edge effects from adjacent residential development” (page 3.5-87). The draft EIR/EIS/EIS does not conclude that the habitat has no wildlife value or that the project would not have an effect on wildlife present in the proposed golf course reconfiguration area. The discussions of Impacts 3.5-8 and 3.5-9 describe in detail how the conversion of approximately 60 acres of lodgepole pine forest,

Jeffrey pine forest, dry meadow, sagebrush dry meadow, and other vegetation types as a result of golf course reconfiguration would affect special-status and common wildlife species. The baseline information was used, along with the significance criteria (pages 3.5-56 and 3.5-57), to determine significance and the need for mitigation for these project actions. Comments addressing the impact evaluations for specific wildlife and wildlife corridors are discussed in the following subsections.

### **3.3.2 IMPACT ANALYSIS FOR WILDLIFE AND WILDLIFE MOVEMENT CORRIDORS**

This master response addresses comments on the draft EIR/EIS/EIS related to the impact analysis conducted for potential impacts on wildlife and wildlife movement corridors. Commenters specifically addressed the conclusions of the impact analysis pertaining to upland habitat and species that could be affected from conversion of forest habitat to golf course features under Alternative 2. Commenters state that impacts on wildlife movement corridors and fragmenting Washoe Meadows SP are not adequately addressed in the draft EIR/EIS/EIS. This section of this master response addresses general comments made on the adequacy of the impact analysis for wildlife and wildlife movement corridors presented in the draft EIR/EIS/EIS and responds to all or part of the following comments: AOB1-1, AOB4-1, AOB8-20, AOB9-2, AOB9-5, AOB12-1, AOB13-1, AOB14-1, AOB24-4, AOB24-8, AOB30-3, AOB31-16, AOB31-20, AOB31-26, AOB31-57, I3-1, I4-1, I7-5, I6-2, I7-11, I7-12, I13-8, I18-1, I18-2, I20-1, I20-2, I23-1, I23-3, I31-1, I41-1, I43-1, I50-1, I52-1, I54-1, I54-4, I55-1, I157-13, I64-4, I64-7, I64-9, I64-12, I64-19, I165-1, I70-1, I79-1, I82-2, I83-1, I110-1, I153-2, I157-13, I161-1, I179-6, I179-8, I179-9, I190-1, I191-1, I192-1, I192-5, I201-1, I216-1, I216-2, I222-1, I238-3, I238-5, I238-10, I239-1, I240-1, PM1-8, PM1-14, PM1-18, PM2-38, PM2-41.

The analysis of potential impacts on wildlife and wildlife movement corridors evaluated in the draft EIR/EIS/EIS was based on the environmental baseline, described above and in the draft EIR/EIS/EIS; project features; and significance criteria established by CEQA, the National Environmental Policy Act (NEPA), and TRPA regulations. These regulations, described in the discussion of significance criteria (pages 3.5-56 and 3.5-57), are generally consistent with their treatment of wildlife resources. CEQA defines a significant impact on biological resources as an action that would “have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by CDFG or USFWS” (page 3.5-56), or would “interfere substantially with the movement of any native resident or migratory fish or wildlife species or established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites” (page 3.5-56). Similarly, NEPA defines a significant impact on biological resources as an action that would “substantially reduce the size, continuity, or integrity of wildlife or fish habitat, or result in unnatural changes in the abundance, diversity, or distribution of wildlife or fish species” or would “have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, threatened, endangered, or special-status species under the ESA or the MBTA” (page 3.5-56). TRPA regulations define a significant impact on biological resources as an action that would “cause a substantial change in the diversity or distribution of species, or the numbers of any species of animals (birds or land animals including reptiles, insects, mammals, amphibians, or microfauna)” or would “reduce the number of any unique, rare, or endangered animal species” or “result in a barrier to the migration or movement of animals” (page 3.5-57). These criteria were used to evaluate the level of significance for impacts related to wildlife and wildlife movement corridors.

Commenters disagreed with the determination of the study area’s value and use as a wildlife movement corridor. The draft EIR/EIS/EIS confirms that the study area could provide a wildlife corridor and states that “the mix of forest, meadow, and riparian habitat in this block of open space, within the context of the larger complex of open space or low-density development to the north and south of the study area, provides a habitat link within the Upper Truckee watershed and the Tahoe Basin” and that “the primary feature of the study area that provides value for wildlife movement would be the riparian corridor of the Upper Truckee River” (page 3.5-55). The draft EIR/EIS/EIS also concludes that although wildlife certainly use and migrate through the study area, the study area “is not expected to function as a significant corridor for common or sensitive wildlife species due to its proximity to residential neighborhoods to the west (North Upper Truckee Road and adjoining neighborhoods), north (Echo

View Estates, Tahoe Mountain), and south (San Bernardino Road and South Upper Truckee neighborhoods), and well-traveled roads (U.S. 50 to the south and east, Sawmill Road to the north)” (page 3.5-55).

For the alteration of the wildlife corridor to be considered a significant impact under Alternative 2 or the proposed Preferred Alternative, there must be substantial change to the current status of the resource, according to the significance criteria previously described, anticipated as a result of implementing the proposed Preferred Alternative. Implementing the proposed Preferred Alternative would result in habitat restoration involving approximately 97 acres of floodplain and meadow. Riparian habitats of the Upper Truckee River are the primary habitat types within the study area that would function as a wildlife corridor, and these habitat types would be expanded and improved with implementation of the proposed Preferred Alternative. The draft EIR/EIS/EIS describes in detail and provides relevant citations for wildlife habitat relationships of the riparian habitats, including the potential for these habitats to act as a wildlife corridor (pages 3.5-19 through 3.5-21). In its current status, the value of this wildlife corridor (the river and riparian habitats within the study area) is degraded because the golf course abuts the riverbank in several locations and thus the riparian habitat is not continuous. In addition, and as stated in the draft EIR/EIS/EIS, the study area was not identified as a high priority for maintaining regional wildlife corridors by the California Essential Habitat Connectivity Project, a recently-completed, peer-reviewed statewide assessment of important habitat linkages (Spencer et al. 2010). The removal of approximately 60 acres of upland habitat, common to the Tahoe Basin, could disrupt wildlife movement in that area; however, the (mostly common) species that use this habitat type can and do move through a variety of urban and nonurban landscapes. Their movement patterns in the urban, open space, and wildland mosaic of the Upper Truckee Watershed would not be expected to be altered over the long term as a result of implementing the proposed Preferred Alternative.

Commenters expressed concern that removing upland habitat would increase the presence of black bear, coyote, or other common wildlife species in nearby neighborhoods. Although some alteration to movement patterns is anticipated with construction activities and removal of forest habitat, an overall increase in abundance of common wildlife, including black bear, in adjacent neighborhoods is unlikely to occur with project implementation based on the life history traits of these species and the habitat characteristics of these neighborhoods. Species with large home ranges, such as black bear and coyote, are unlikely to establish dens in neighborhoods because they would be disturbed by cars, domestic animals, and other sources of disturbance. They would more likely pass through these areas when travelling between natural environments. Because the neighborhoods do not support all aspects of these species’ life history, increased abundance in the neighborhoods is unlikely. Adjacent forestlands with qualities similar to those of the forest habitat that would be removed under the proposed Preferred Alternative could see increases in species abundance; however, because these forest habitats are widespread in the vicinity of the study area, the potential incremental increase is unlikely to be substantial. In addition, the primary motivation for these species to enter neighborhoods—easy access to food sources, such as improperly stored trash and domestic animals (coyotes are known to eat cats and small dogs in the Tahoe Basin)—would not be altered as a result of project implementation.

Commenters were also directed at the impact analysis for common and sensitive wildlife species (mule deer, northern goshawk, bear). In general, these comments expressed disagreement with the conclusions reached in the impact determination for Alternative 2. Mule deer, northern goshawk, and bear observations were reported in comments. Mule deer presence in the study area is assumed in the impact analysis, and the draft EIR/EIS/EIS states that “because the study area provides cover and forage habitat, and the species has been documented nearby, mule deer may occasionally use the study area for foraging” (pages 3.5-53 and 3.5-54). The draft EIR/EIS/EIS also concludes that because of existing “disturbance levels from recreation (including golfers, pedestrians, and bicyclists), and residential development (including the regular presence of dogs), and from adjacent land uses” (page 3.5-53), deer fawning is unlikely to occur in the study area. Overall, the presence of mule deer is anticipated; however the activity and abundance of the species in the study area is expected to be low because of the low abundance of mule deer in the Tahoe Basin and because of the habitat conditions described previously.

Northern goshawk is also mentioned specifically in comments, and observations have been reported. The draft EIR/EIS/EIS reports known occurrences of foraging goshawks and concludes that although no individuals were

identified during protocol surveys, northern goshawks likely forage in portions of the study area. Nesting habitat was determined to be limited in the study area because of forest structure and because “larger areas of higher quality habitat nearby (Saxon Creek, Tahoe Mountain, Trout Creek) are available” (page 3.5-83).

The discussions of Impacts 3.5-8 and 3.5-9 (pages 3.5-81 through 3.5-88) address the short- and long-term potential impacts on common and special-status wildlife. For both common and special-status wildlife, the draft EIR/EIS/EIS acknowledges that if those species are present in the proposed golf course reconfiguration area “construction could disturb individuals and remove foraging habitat” and result in a “loss of habitat and increased localized habitat fragmentation” (page 3.5-87). Despite these potential effects, and in consideration of Mitigation Measures 3.5-8A and 3.5-8B (designed to minimize short-term impacts on special-status species), implementation of Alternative 2 “would not cause wildlife populations to decrease below self-sustaining levels, or result in a change in species diversity” (page 3.5-87) and thus would not cause a significant impact as defined by the CEQA, NEPA, or TRPA significance criteria.

### **3.3.3 SENSITIVE HABITATS**

This master response addresses comments on the draft EIR/EIS/EIS related to baseline information, potential impacts, and impact analysis provided for sensitive habitats (jurisdictional wetlands, riparian vegetation, fens, and SEZ areas). Comments specifically addressed the conclusions of the impact analysis conducted for sensitive and common habitats that could be affected during conversion of forest habitat to golf course features under Alternative 2. Commenters disagree with impact conclusions related to sensitive habitats in the draft EIR/EIS/EIS. Changes incorporated into the final EIR/EIS/EIS include a revised vegetation map and associated descriptions of vegetation type, along with inclusion of additional information on the spring and fen. This section of this master response addresses general comments made on the adequacy of baseline information and the impact analysis for sensitive habitats presented in the draft EIR/EIS/EIS, and responds to all or part of the following comments: AOB8-3, AOB8-14, AOB9-3, AOB9-4, AOB11-3, AOB12-1, AOB13-1, AOB14-1, AOB24-4, AOB24-9, AOB24-10, AOB30-2, AOB30-3, AOB31-16, AOB31-22, AOB31-23, AOB31-25, I7-6, I7-7, I7-8, I18-1, I18-2, I20-1, I54-4, I64-5, I64-21, I111-5, I111-7, I124-1, I157-12, I157-14 through I157-16, I165-1, I179-4, I179-6, I179-7, I179-11, I190-1, I191-2, I192-2, I192-8, I201-1, I209-1, PM1-14, PM2-41, PM2-42, PM2-64.

The environmental setting section of the draft EIR/EIS/EIS describes terrestrial and aquatic habitats located in the study area, along with the potential for special-status plant and animal species to occur in these areas. Comments addressed the adequacy of the vegetation mapping and, in particular, the characterization and mapping of the fen in Washoe Meadows SP. To respond to these comments fully and to update the baseline with information collected since preparation of the draft EIR/EIS/EIS regarding the fen and the overall vegetation structure in and adjacent to the study area, additional surveys, including a detailed mapping effort of the fen, were conducted in 2010 by botanists from State Parks, California Native Plant Society, and the Tahoe Environmental Research Center. The results of these efforts have been included in this document in Chapter 5, “Corrections and Revisions to the 2010 Draft EIR/EIS/EIS.” Specific changes to the draft EIR/EIS/EIS section include updated mapping, new habitat descriptions, and incorporation of the new baseline information into the impact analysis as necessary. The draft EIR/EIS/EIS previously had characterized the area containing the fen west of the Upper Truckee River as “spring complex.” This area has been remapped and now includes the following categories: verified fen, unverified fen, and Lodgepole Pine Wet-Type forest for a more detailed survey. The verified fen was determined to have 40 centimeters (cm) (or greater) of organic soils in the upper 80 cm of the soil profile. Although the more detailed mapping efforts present additional details of habitat types, they do not change the significance conclusion presented in the draft EIR/EIS/EIS. For a complete description of the verification process and maps showing the location of the verified fen, which lies upslope and outside of the golf course relocation area, see the fen report included in Appendix M.

In addition to comments on the vegetation baseline, other comments expressed concern about impacts on the fen and springs. In particular, comments focused on impacts caused by the wetlands restoration associated with the old quarry. This restoration activity has been removed from the proposed Preferred Alternative; no other alternatives

proposed this project element. Removal of this design element alleviates concerns about potential impacts associated with this restoration action. Furthermore, golf course improvements would be located down-gradient from the fen and therefore would have no effect on them. No fens are located within the golf course footprint. As shown in Exhibit 3.5-1, presented in Chapter 5 of this document, fens are located up-gradient and outside of the golf course footprint. One spring feature would be surrounded by golf course with implementation of the proposed Preferred Alternative; however, no sensitive wildlife or plant species are known to occur in the area and natural vegetation buffers between the golf course and this spring would prevent impacts to this area if unidentified species were existing. Implementing Mitigation Measure 3.4-8 (Alt. 2) would prevent water quality degradation related to golf course operations by ensuring that irrigation and stormwater from the golf course would not interact with natural habitats (flows would be routed around landscaped areas), preventing groundwater interactions (subsurface barriers or other control methods would be installed where needed), and preventing percolation or surface overflow from golf course features. The spring feature that would be surrounded by golf course features under the proposed Preferred Alternative would have one green and three tee-boxes located upslope of this feature, and, following design requirements detailed in Mitigation Measure 3.4-8 (Alt. 2), these areas would be hydrologically separated from the spring, and no surface water or groundwater alterations to the spring would take place. Other impacts on sensitive habitats, including SEZs, riparian vegetation, wetlands, and the fen, are described in detail in the draft EIR/EIS/EIS with mitigation proposed as needed based on CEQA, NEPA, and TRPA significance criteria.

## **3.4 HYDROLOGY, FLOODING, GEOMORPHOLOGY, AND WATER QUALITY**

### **3.4.1 FEN HYDROLOGY**

This master response addresses comments on the draft EIR/EIS/EIS related to the impact analysis conducted for potential impacts of Alternative 2 on the hydrology of the fen and springs in the Washoe Meadows SP portion of the study area and that expressed concern that the mitigation identified was inadequate. This section of this master response addresses general comments made on the adequacy of the impact analysis for the fen and springs and responds to all or part of the following comments: AOB8-3, AOB9-3, AOB9-4, AOB11-3, AOB12-1, AOB13-1, AOB14-1, AOB24-4, AOB24-10, AOB30-2, AOB31-16, AOB31-25, I7-8, I64-21, I111-5, I111-6, I157-4, I157-15, I165-1, I192-6, I201-1, I209-1 PM1-14, PM2-41, PM2-42, PM2-64.

Commenters questioned the accuracy of the draft EIR/EIS/EIS analysis of the potential impact of Alternative 2 on hydrology of the fen and springs in the Washoe Meadows SP portion of the study area and expressed concern that the mitigation identified was inadequate. In addition to the information below, see Master Response Section 3.3, “Biological Resources” for additional information about the existing fen and potential biological impacts. To respond to comments fully, additional information regarding the fen has been collected since preparation of the draft EIR/EIS/EIS. A more precise classification and mapping has been performed and used to update the setting in Chapter 5, “Corrections and Revisions to the draft EIR/EIS/EIS,” including Exhibit 3.5-1.

The level of detail in the setting sections of Section 3.3, “Hydrology and Flooding,” and Section 3.4, “Geomorphology and Water Quality,” of the draft EIR/EIS/EIS is general with respect to the surface water and groundwater features west of the river, but not incomplete. It was limited to the information available regarding the fen and springs. Additional information related to the spring complexes (including the fen) was presented in Section 3.5, “Biological Resources,” in the draft EIR/EIS/EIS. The impact analyses did consider the presence, biologic functions, and potential erosion, sedimentation, flooding, and water quality effects of implementing Alternative 2 on the existing seeps, springs, and drainages west of the river.

The most important factor regarding potential impacts on the fen complex is that the proposed Preferred Alternative golf course layout is down-slope of the fen and has a 100-foot minimum buffer distance. Some commenters incorrectly indicated that the potential layout could encircle the fen, but the fen would be completely outside, upslope, and northwest of the proposed golf course relocation boundary under the proposed Preferred Alternative. Some commenters also incorrectly concluded that “logging” would be required upslope of or adjacent to the fen as part of implementation of Alternative 2, but this potential indirect effect on the hydrology or water

quality of the fen would not occur. Trees would be removed down-gradient of the fen. Some comments expressed concern about potential impacts on the fen that could result from wetlands restoration at the old quarry. The restoration activity is no longer part of the proposed Preferred Alternative (the only proposed alternative that originally included it).

The fen at Washoe Meadows SP is classified as a sloping fen (also called soligenous peatland), which is supported by groundwater typically at a discharge point that occurs as a result of a slope break or underlying geologic change (Appendix M). The groundwater source supporting the fen is up-gradient/upslope from the fen and from areas proposed for changes under Alternative 2. Modifications to surface hydrology and/or surface contours down-slope of the fen that would occur if the proposed Preferred Alternative were implemented could not adversely alter the fen hydrology. Additionally, the potential changes to soil moisture and shallow groundwater down-slope of the fen along the west margin of the proposed golf course under the proposed Preferred Alternative would likely have a neutral or net positive benefit on groundwater levels rather than any mechanism for an adverse impact on fen hydrology. Potential benefits to local soil moisture and shallow groundwater near the fen relative to existing conditions could result from several aspects of the proposed Preferred Alternative: raising of the riverbed east of the fen, improved soil moisture recharge and higher groundwater levels down-valley (to the northeast) because of river and floodplain restoration, and localized increases in soil moisture within the proposed managed landscape footprint that would be irrigated. These changes, although minor in magnitude, would all be in the direction of benefits to the fen groundwater conditions rather than adverse groundwater modifications. The proposed Preferred Alternative would not modify the “source” of groundwater to the fen, but it could beneficially reduce groundwater gradients or loss rates down-slope of the fen.

Commenters expressed concern about impacts on the spring “in the donut hole” of the Alternative 2 golf course layout. A portion of the potential golf course layout under the proposed Preferred Alternative would, although not surrounding the fen, surround a spring-fed drainage near the southwest corner of the proposed layout. The spring has a small upslope surface drainage and/or groundwater recharge area that could be affected by the golf course footprint disturbance and operations. The potential for direct hydrology and water quality effects on this spring and drainage related to construction and operation of the golf course under Alternative 2 was considered in the draft EIR/EIS/EIS in Section 3.3, “Hydrology and Flooding,” and Section 3.4, “Geomorphology and Water Quality.” Potentially significant adverse changes to surface runoff would be minimized by implementing Mitigation Measure 3.3-1 (Alt. 2). Potentially significant short-term adverse water quality effects would be minimized by implementing Mitigation Measure 3.4-6 (Alt. 2), including specific measures to protect groundwater seepage at springs west of the river from comingling with surface water. Potentially significant risks of water quality degradation from golf course operations would be minimized by implementing Mitigation Measure 3.4-8 (Alt. 2), including specific requirements to allow natural drainages to convey water without interaction with golf course stormwater and to prevent golf course irrigation water or stormwater from interacting with shallow groundwater in the vicinity of natural seeps in Washoe Meadows SP.

### **3.4.2 WATER DEMAND EFFECT ON UPPER TRUCKEE RIVER AND GROUNDWATER**

Commenters expressed concern that the draft EIR/EIS/EIS did not adequately quantify the irrigation water demand of alternatives or evaluate the impacts of providing nonpotable water supply on the Upper Truckee River and local groundwater. This section of this master response addresses general comments made on the adequacy of the impact analysis for water demand effects on the Upper Truckee River and groundwater. It responds to all or part of the following comments: AOB12-1, AOB13-1, AOB14-1, AOB20-3, AOB21-1, AOB21-2, AOB21-3, AOB31-52, I4-9, I10-4, I13-1, I13-2, I13-3, I42-1, I66-2, I111-6, I120-1, I121-1.

The draft EIR/EIS/EIS includes setting information about water supply and use in Section 3.3, “Hydrology and Flooding” (pages 3.3-34 and 3.3-35), and identifies impacts related to long-term irrigation water demand (Impact 3.3-6) based on the location, area, type of turf, and the irrigation system features for each alternative. To further

clarify the existing conditions and provide quantification of impacts, additional information has been gathered and supplemental calculations have been made, as described below.

The following text replaces setting information on pages 3.3-34 and 3.3-35 of the draft EIR/EIS/EIS:

Historically, a riparian surface water diversion (DWR #S015849) located near RS 2200 has been the primary source of golf course irrigation water. Only the first nine holes were irrigated during the first 5 years after construction; however, the entire 18-hole course has been irrigated for the past 43 years (Stanowski, pers. comm., 2008). The existing golf course has 104 acres of intensively managed landscape areas (Table 3.3-4) and 23 acres of minimally managed landscape that receives irrigation more regularly than under the ideal definition because of the existing system conditions.

<b>Table 3.3-4 Existing Irrigated Areas at Lake Tahoe Golf Course</b>	
Landscaped Area*	Total (acres)
Intensively managed	104
Minimally managed	23
Naturalized	7
<b>Total</b>	<b>134</b>
Note: * Intensively managed areas include tees, greens, fairways, driving range, lawn, rough and 6 acres of facilities (buildings, parking lots, etc.). Minimally managed and naturalized areas are inadvertently over irrigated compared to their ideal management (as defined in Chapter 2) because of the existing irrigation system equipment. Source: Data provided by State Parks in 2011	

Channel conditions and shallow flow depths in the river have rendered surface water diversion difficult. During drought and/or some dry-season situations, a submersible pump is used to pull water from the Upper Truckee River during the day for temporary storage in the largest golf course pond (hole 9 pond) for irrigation distribution overnight (Stanowski, pers. comm., 2008). Nonpotable water use (i.e., water diverted from the Upper Truckee River) has been documented in recent years and provided to the State Water Resources Control Board (LTGC 2003, 2009). The maximum capacity of the existing submersible pump rate is 1,000 gallons per minute (gpm). Recent irrigation practices range from as early as 6 p.m. to as late as 10 a.m. (16 hours per day), which would equate to a maximum daily irrigation use of 960,000 gallons per day (approximately 2.95 acre-feet per day). Typical operations during high season (June/July) are reported (Stanowski, pers. comm., 2011) to be approximately 550,000 gallons per day, decreasing to half that amount in August, further dropping to 30% of that amount by the end of September and to less than 20% of the high season amount in October. The reported “typical” irrigation pattern represents a total annual water use of 194.0 acre-feet. The annual and monthly estimates (Stanowski, pers. comm. 2011) are consistent with surface water diversions reported for operations during 2002, 2006, 2007, and 2008 to the State Water Resources Control Board (Table 3.3-5).

The irrigation system on the existing course is a combination of old pipes and lines that have been patched, repaired, and replaced as needed over the years (Stanowski, pers. comm., 2008). Irrigation lines within the front-nine greens have been repaired and replaced during the past decade; however, the remaining areas still have older lines with lower effectiveness and efficiency. Irrigation heads spray water a full 360 degrees with a 90-foot throw distance, making it difficult to target water application (Walck, pers. comm., 2009). Despite system deficiencies, modern irrigation control and soil moisture monitoring are performed to help conserve water on the course (Lake Tahoe Golf Course and Restaurant 2000).



<b>Table 3.3-5 Surface Water Diversion (Acre-Feet) at Lake Tahoe Golf Course</b>				
<b>Month</b>	<b>2002</b>	<b>2006</b>	<b>2007</b>	<b>2008</b>
January	NA	NA	NA	NA
February	NA	NA	NA	NA
March	NA	NA	NA	NA
April	2.5	NA	NA	NA
May	18.0	9.1	5.7	5.3
June	60.0	29.4	10.0	10.2
July	34.0	45.1	55.3	57.6
August	39.0	52.8	46.0	47.8
September	29.0	32.4	48.0	46.0
October	13.0	18.6	1.8	1.6
November	0.5	3.4	NA	NA
December	NA	NA	NA	NA
Annual	196.0	190.8	166.8	168.5
Note: NA = Not Applicable Sources: Lake Tahoe Golf Course "Statement of Water Diversion and Use" (April 14, 2003) and "Supplemental Statement of Water Diversion and Use (May 18, 2009) submitted to the California State Water Resources Control Board.				

American Golf has developed an alternative irrigation supply using a deep on-site well. The well was planned to increase flexibility and maximize capacity while reducing the need to draw from the river under low-flow conditions. The groundwater supply was tested in October 2008, and the well began operation during the 2009 irrigation season. Test yields of approximately 400 gpm have been typical, with a maximum of 600 gpm. The desired yield would be in the range of 450–500 gpm (Stanowski, pers. comm., 2008). The irrigation supply well was completed to a depth of 295 feet below ground surface and is slotted from 195 feet below ground surface to the base of the well (Bruce MacKay Pump & Well Service 2008). Coarse materials make up the shallow aquifer and are underlain by about 150 feet of gray silt above the slotted interval of the well. Based on the logged geologic characteristics and the slot/screened interval, the groundwater source accessed via the new deep well is disconnected from the shallow aquifer that directly interacts with the surface flow and underflow of the Upper Truckee River.

To provide clarification to the impact analysis in the draft EIR/EIS/EIS in Section 3.3, "Hydrology and Flooding," water demand has been quantified and estimated irrigation water needs for all alternatives has been performed using standard climatic water budget accounting methods (webWIMP ) (Matsura et al. 2009), site-specific soil information, and vegetation/turf areas for the alternatives.

Based on the physical characteristics provided by the NRCS (2007), the water-holding capacity of each soil series in the study area was calculated (Appendix N-1). Each soil map unit present in the study area (see draft EIR/EIS/EIS Section 3.6, "Earth Resources," for soil types) is assigned a water-holding capacity that reflects the proportion of map unit area occupied by each soil series (Appendix N-2). Monthly climatic water budgets for the study area's latitude, longitude, elevation range, historic temperature, precipitation, and soil water-holding capacities were calculated using an online modeling tool (WebWIMP) from the University of Delaware (Appendix N-3). The climatic water budget results provide a monthly "water deficit" that is the difference between potential evapotranspiration and actual evapotranspiration (which is limited by available moisture from precipitation, snow storage, and soil moisture storage). The water deficit is theoretically the irrigation water needed assuming 100% efficient delivery of the irrigation water. Actual irrigation efficiencies are less than 100%

because collection, distribution, and application systems are imperfect (Howell 2003:468). The lower the irrigation efficiency, the greater the total applied water need above the calculated deficit (Appendix N-4).

For the existing and estimated future conditions under Alternative 1, the acreage of intensively managed landscape, the soil types that have irrigated turf, and the irrigation infrastructure would not be modified. Under Alternative 1, all 98 acres of irrigated landscaping would remain on soil map unit 7431 (Celio loamy coarse sand, 0–5%). The monthly water budget deficit and applied water need (Table 3-4) would be similar to the present deficit and need (see the column showing 60% efficiency because the quality of the present irrigation system is poor). These calculations are consistent with the reported water use (approximately 166–196 acre-feet per year) and indicate that the water budget model is representative of the site conditions.

<b>Table 3-4 Alternative 1 Water Demand (Acre-Feet) for 98 Acres of Intensively Managed/ Irrigated Golf Course</b>				
Month	Calculated Water Demand			
	Water Budget Deficit	Applied Water Need		
		80% Efficiency*	60% Efficiency*	
January	NA	NA	NA	
February	NA	NA	NA	
March	NA	NA	NA	
April	NA	NA	NA	
May	3.4	4.3	5.7	
June	20.1	25.2	33.6	
July	36.9	46.1	61.4	
August	33.8	42.2	56.3	
September	22.5	28.1	37.5	
October	6.8	8.5	11.4	
November	NA	NA	NA	
December	NA	NA	NA	
Annual	123.5	154.4	205.9	

Notes:  
 \* Irrigation Efficiency is the ration of water needed to satisfy evaporative demands relative to total water applied.  
 NA = Not Applicable  
 Source: Data provided by Valley & Mountain Consulting in 2011

Soil conditions and irrigation infrastructure efficiency considerations would be the same under Alternative 4 as under Alternative 1. Irrigation demand under Alternative 4 would be slightly less than under Alternative 1 because Alternative 4 has a slightly smaller irrigated area (95 acres), which would result in a modest reduction in annual applied water need (approximately 201.9 acre-feet, assuming 60% efficiency).

For the estimated future conditions under Alternative 2 or the proposed Preferred Alternative, the acreage of intensively managed landscape would decrease, the soil types with irrigated turf would differ, and the irrigation infrastructure would be improved compared with Alternative 1. Under the proposed Preferred Alternative, 40 acres of irrigated landscaping would be located on soil map unit 7431 (Celio loamy coarse sand, 0–5%), 22.5 acres would be located on soil map unit 7042 (Tahoe gravelly), and 22.5 acres would be located on soil map unit

7482 (Meeks, stony). The monthly water budget deficit and applied water need (Table 3-5) would be less than under existing conditions because of the higher soil moisture holding capacities of the Tahoe and Meeks soil map units and the decreased acreage irrigated. In addition, even more water savings would be expected based on improved efficiency (closer to approximately 80% rather than the existing 60%).

<b>Table 3-5 Proposed Preferred Alternative Water Demand (Acre-Feet) for 85 Acres of Intensively Managed/Irrigated Golf Course</b>			
Month	Calculated Water Demand		
	Water Budget Deficit	Applied Water Need	
		80% Efficiency*	60% Efficiency*
January	NA	NA	NA
February	NA	NA	NA
March	NA	NA	NA
April	NA	NA	NA
May	2.1	2.6	3.5
June	14.9	18.6	24.8
July	29.9	37.3	49.8
August	28.5	35.6	47.5
September	19.3	24.2	32.2
October	5.8	7.3	9.7
November	NA	NA	NA
December	NA	NA	NA
Annual	100.5	125.6	167.5

Notes:  
 \* Irrigation Efficiency is the ration of water needed to satisfy evaporative demands relative to total water applied.  
 NA = Not Applicable  
 Source: Data provided by Valley & Mountain Consulting in 2011

For the estimated future conditions under Alternative 3, the acreage of intensively managed landscape would further decrease and the irrigation infrastructure would be improved compared with Alternative 1, but the soil types with irrigated turf would be the same as present. Under Alternative 3, all 45 acres of irrigated landscaping would be located on soil map unit 7431 (Celio loamy coarse sand, 0–5%). The monthly water budget deficit and applied water need (Table 3-6) would be less than under existing conditions because the amount of acreage irrigated would be decreased and even more water savings would be expected from improved efficiency (closer to approximately 80% rather than the existing 60%).

The detailed water budget analysis for the existing and proposed conditions under the alternatives presented above has additional quantitative information from that presented in the draft EIR/EIS/EIS. The additional information does not alter the conclusions regarding Impact 3.3-6 in terms of direction or the relative magnitude of impact, significance level, or need for mitigation for any of the alternatives.

Commenters were concerned that water supply diversion from the river under low-flow conditions could be harmful to aquatic resources and would be worsened under Alternative 2. However, the draft EIR/EIS/EIS accurately concluded that the baseline conditions have not exceeded any legal maximum rate; the new deep groundwater well helps to reduce surface diversion demands; and implementing Alternative 2, 3, or 5 would reduce future water demand. First, the monthly amounts of surface diversions in recent years, as reported to the State Water Resources Control Board (see Table 3.3-5), are consistent with the water rights on file, which lists no maximum diversion rate or any instream flow minimum to meet (SWRCB 2011). Second, the groundwater well

**Table 3-6  
Alternative 3 Water Demand (Acre-Feet) for 45 Acres of Intensively Managed/Irrigated Golf Course**

Month	Calculated Water Demand		
	Water Budget Deficit	Applied Water Need	
		80% Efficiency*	60% Efficiency*
January	NA	NA	NA
February	NA	NA	NA
March	NA	NA	NA
April	NA	NA	NA
May	1.7	2.1	2.8
June	9.9	12.3	16.5
July	18.1	22.6	30.1
August	16.6	20.7	27.6
September	11.0	13.8	18.4
October	3.3	4.2	5.6
November	NA	NA	NA
December	NA	NA	NA
Annual	60.6	75.7	101.0

Notes:  
 \* Irrigation Efficiency is the ration of water needed to satisfy evaporative demands relative to total water applied.  
 NA = Not Applicable  
 Source: Data provided by Valley & Mountain Consulting in 2011

installed in 2008 draws from materials at depths that are isolated from the surface sands and gravels by thick silt deposits (Bruce MacKay Pump & Well Service 2008) and are not freely connected to the surface aquifer that is directly linked to the river. A goal of the groundwater well was to provide an option for obtaining irrigation water with less river diversion. Pumping from the deep groundwater supply well would not be expected to lower surface water in the river or shallow groundwater directly connected to the river. This benefit would be realized under Alternative 1 and the action alternatives. Finally, the water demands for all action alternatives would be less than those under existing conditions, as described in the draft EIR/EIS/EIS and further clarified in the preceding water budget analysis. The magnitude of reduced demand varies by alternative but is substantial and measureable for Alternatives 2, 3, and 5 (see Tables 3-4, 3-5, and 3-6). Based on these factors, increased water diversion impacts on the river and adverse groundwater lowering that could indirectly reduce river levels would not occur under any of the action alternatives.

### 3.4.3 MONITORING OF GOLF COURSE CHEMICAL USE

Commenters expressed concern that monitoring required as part of the golf course’s compliance with water quality regulations has not been strict enough in the past and/or would not be strict enough in the future. Some commenters requested additional monitoring to better establish the baseline conditions; however, CEQA does not mandate the collection of specific new data; rather, it states that the setting and impact analysis shall be based on existing information. Section 3.4, “Geomorphology and Water Quality,” of the draft EIR/EIS/EIS was based on all available information regarding site-specific and riverwide water quality conditions. This section of this master response responds to all or part of the following comments: AOB31-27, AOB31-53, I4-6, I4-7, I4-8.

The commenters’ criticisms of monitoring and reporting requirements imposed by the Lahontan Regional Water Quality Control Board (RWQCB) are noted. However, it is outside the purpose of the CEQA, NEPA, and TRPA environmental compliance processes to dictate permit conditions or enforcement by an outside entity. In Section 3.4, “Geomorphology and Water Quality,” the draft EIR/EIS/EIS indicates that the Lahontan RWQCB would

update the waste discharge permit for Alternatives 2 and 3 (pages 3.4-57 and 3.4-63), presumably strengthening the monitoring and reporting requirements. State Parks and its concessionaires would work with the Lahontan RWQCB to update and implement any new waste discharge permit requirements for the final design and operations plan.

The strengthening of regulatory requirements assumed in the draft EIR/EIS/EIS is verified by the Lahontan RWQCB in its comment letter (see comment AOB11-4), which states that operational requirements for the relocated golf course imposed by the Lahontan RWQCB would be consistent with other new golf course construction and operation requirements that require extensive surface water and groundwater monitoring and detailed irrigation and fertilizer management.

### **3.4.4 POTENTIAL FOR GOLF COURSE CHEMICALS TO ENTER GROUNDWATER OR SURFACE WATER**

Commenters raised concerns about water quality impacts related to golf course use of herbicides, fertilizers, and pesticides. Commenters requested nutrient-loading estimates for each alternative. Quantitative loading estimates are not needed to evaluate whether a significance threshold would be reached or whether a significant effect relative to baseline would occur because an assessment can be made based on existing water quality data, known and proposed BMPs, and irrigation information discussed above. Additionally, the potential effects of the alternatives can be compared and ranked without collecting or generating new data. This section of this master response responds to all or part of the following comments: AOB8-7, AOB8-10, AOB8-19, AOB20-1, AOB21-3, AOB24-4, AOB24-7, AOB30-5, AOB31-27, AOB31-30, AOB31-47, AOB31-48, AOB31-40, AOB31-56, AOB32-9, I1-1, I4-1, I4-2, I4-3, I4-5, I10-1, I20-1, I120-1, I122-1, I126-1, I148-4, I158-1, I188-2, I192-6, I197-1, I203-1, I212-1, I216-1, PM1-14, PM1-43, PM1-21.

The draft EIR/EIS/EIS includes a discussion of fertilizer (and pesticide) practices under existing conditions (which are those for Alternative 1 and 4). For clarification, additional information obtained from the Lake Tahoe Golf Course (Stanowski pers. comm. 2011) has been used to clarify and update information in the draft EIR/EIS/EIS. The following text replaces the fourth paragraph on page 3.4-30:

Fertilizer use at the Lake Tahoe Golf Course is minimal and typically occurs between May and October. The applications start after the soil temperature reaches 55°F. They continue through the irrigation season (on greens and tees, to a lesser degree the fairways). Most fertilizers used are slow release. Use of slow-release fertilizer minimizes the amount of fertilizer free in the soil that could be leached. Fertilizers used on-site that are not slow release either are applied as spoon fed on greens only (on approximately 2 acres) or are applied in a manner that approximates a slow-release feeding in that they are applied in such small quantities (per acre) that they do not overwhelm the soil's ability to hold and then release them to the plant to match growth rates. Nitrates and soil are both negatively charged, which prevents the soil from holding on to excess nitrate. Whatever nitrate is not used by the plants could be lost to the groundwater; therefore, nitrates applied at the golf course are minimal and only included where they are secondary ingredient of other products (for example, calcium products). Fertilizer use is focused on fairways, tees, and greens, and not within the rough or 'minimally managed' areas. Herbicides are used only in spot treatments and pesticide use is also very minimal. Fungicide is used on the putting greens once each fall. Buffer zones are located along some fairways adjacent to creeks and ponds. However, some fairways located adjacent to the river currently have no buffer. Buffer areas between golf course turf and the river would generally increase under the proposed Preferred Alternative (See response to comment AOB8-7). Herbicides are used only in spot treatments, and pesticide use is also minimal. Fungicide is used on the putting greens once each fall. The monthly amount of chemical use per unit area (per acre or per 1,000 square feet) is reported to the Lahontan RWQCB each year. No recorded violations of permit conditions or water quality standards have been documented.

The draft EIR/EIS/EIS describes the anticipated changes in fertilizer (and pesticide) practices under Alternatives 2 and 3 in the discussion of Impact 3.4-8 (pages 3.4-57, 3.4-58, and 3.4-63). The impact analysis considers the reduced footprint, decreased water demand for irrigation, and improved irrigation infrastructure as factors that indicate that chemical use would be similar to, or less than, that under existing conditions. No changes in the seasonal application schedule or general types of chemicals needed would occur under the proposed Preferred Alternative or Alternative 3. The additional quantification of water budget and irrigation demand provided in the response above further supports the conclusions of the impact analysis in the draft EIR/EIS/EIS. The impact analysis concludes that a potentially significant impact could occur under the proposed Preferred Alternative, despite other regulatory requirements that would be imposed. Mitigation Measure 3.4-8 (Alt. 2) is identified to modify the final design for the stormwater and irrigation runoff system to minimize risks of sediment and chemical pollutant discharges.

The need for an updated golf course chemical management plan under Alternatives 2 and 3 is acknowledged in the draft EIR/EIS/EIS, along with an assumed strengthening of regulatory requirements. This assumption is verified by the Lahontan RWQCB in its comment letter (see comment AOB11-4), which states that operational requirements for the relocated golf course imposed by the Lahontan RWQCB would be consistent with other new golf course construction and operation requirements that require extensive surface water and groundwater monitoring, as well as detailed irrigation and fertilizer management. State Parks and its concessionaire would work with Lahontan RWQCB to update and implement any new waste discharge permit requirements for the final design and operations plan.

## **3.5 RECREATION**

### **3.5.1 RECREATION ACCESS**

This master response addresses comments on the draft EIR/EIS/EIS related to recreation access in the study area. Comments specifically addressed reductions in access for recreational users throughout the study area related to an expanded golf course under Alternative 2. This section of this master response addresses general comments made related to recreation access in the study area and responds to all or part of the following comments: AOB4-1, AOB12-1, AOB13-1, AOB14-1, AOB24-4, AOB24-6, AOB30-2, AOB31-21, I1-2, I4-1, I6-2, I13-6, I38-2, I52-1, I53-1, I75-1, I75-2, I82-1, I148-2, I157-7, I159-1, I153-1, I60-1, I91-3, I192-3, I196-1, I201-1, I203-1, I209-1, I209-2, I216-1, I238-4, I238-10, PM1-14.

As stated in Section 3.8, “Recreation,” of the draft EIR/EIS/EIS, under Alternative 2, access to portions of Washoe Meadows SP would be reduced; however, a new designated trail system compliant, where conditions allow, with the current Americans with Disabilities Act would be constructed to tie the informal dispersed recreation trails on the west side of the river across the bridge and into new trails on the east side of the river. The same conclusions would apply to the proposed Preferred Alternative. The new bridge would provide enough room for two-way golf cart traffic and pedestrian use. In addition, although the proposed Preferred Alternative would not involve replacing the entire length of informal trails that would be removed, the 1.4 miles of new designated trails would be maintained and would provide better connectivity through the study area than the existing user-created trails.

The new trail on the southeast side of the river would traverse the restored SEZ area and connect to the new Sawmill Bike Trail along U.S. 50. Parking would continue to be allowed at the golf course clubhouse parking lot for other recreation uses. A new trail would also connect the new golf course/pedestrian bridge to the corner at Country Club Drive. As part of the interim management plan, State Parks plans to include parking and trailhead signs at this location. In addition, the restored reach of the river that is currently in Lake Valley SRA has not been accessible to recreationists outside of golf course use during the golfing season for safety reasons. This area would be open for recreation access under the proposed Preferred Alternative. Approximately 4,500 feet of river would be open to public use that was previously in the golf course footprint and not open to the public. Although under the proposed Preferred Alternative, portions of the river in Washoe Meadows SP would be located adjacent

to the golf course, between 75 and 100 feet of buffer would be maintained between the golf course and river. In addition, a 200-foot forested buffer would be maintained between the golf course and existing houses in the North Upper Truckee neighborhood.

### **3.5.2 RECREATION SAFETY**

This master response addresses comments on the draft EIR/EIS/EIS related to recreation safety. Comments specifically addressed potential safety concerns related to dispersed recreation and golf being in proximity to each other under Alternative 2. This section of this master response addresses general comments made on recreation safety and responds to all or part of the following comments: I6-6, I6-7, I148-2, I159-1.

As stated in *Trails and Golf Courses: Best Practices on Design and Management* (Alta Planning & Design 2005), trails and golf courses coexist around the country with few reported problems. Case studies reviewed by Alta Planning & Design (2005) indicate that properly designed and managed golf course trails offer a reasonable level of safety and security.

Best management practices for safety have been incorporated into the design for the Upper Truckee River Restoration and Golf Course Reconfiguration Project. They include pedestrian safe zones that would be designated where public pedestrian paths cross or become incorporated into golf course play (Exhibit 2-3). As the draft golf course design indicates, this would occur between holes 7/8 and 12/13 and where the golf course crosses the river at holes 6 and 14. The pedestrian safe zone at the hole 7/8 and 12/13 break is designed to be perpendicular to the golf course to maximize visibility and public safety. A 150-foot buffer is incorporated into the safe zone and would be located between a green and a tee box so that the public would not cross the line of play. The buffer would be screened by existing and planted vegetation where visibility is not necessary for safety. Before pedestrians using the designated paths enter into golf course areas, signs would warn them of potential golfing hazards, and markers would be installed where public trails cross cart paths to direct users. Pedestrians would have the right-of-way in all situations, and yield signs would be installed along cart paths at public access crossings.

Holes 6 and 14, which would parallel the bridge, are designed so that the shot line angles away from the bridge. The bridge area would also be signed and screened as described above. Holes 8, 9, and 13 would parallel the STPUD access road. Along this corridor, shot lines are angled away from the road and would have a minimum 50-foot buffer between the edge of the turf/rough and the road. This buffer would be screened by existing and planted vegetation.

The design features included in the proposed Preferred Alternative would adequately protect the safety of trail users, so no significant safety impact would occur.

### **3.5.3 SIGNIFICANCE OF RECREATION IMPACTS**

This master response addresses comments on the draft EIR/EIS/EIS related to the level of significance of impacts on dispersed recreation. Comments specifically addressed fragmentation of Washoe Meadows SP, loss of trails, and consistency with TRPA recreation goals under Alternative 2. Commenters disagreed with impact conclusions related to dispersed recreation in the draft EIR/EIS/EIS. This section of this master response addresses general comments made on the significance of impacts on dispersed recreation in the draft EIR/EIS/EIS and responds to all or part of the following comments: AOB24-4, AOB30-2, I38-2, I38-3, I64-10, I165-4, I75-1, I153-1, I192-3, I196-1, I209-1, I209-2, I226-3, I238-3, PM1-14.

As described in Section 3.8, "Recreation," of the draft EIR/EIS/EIS, approximately 1.4 miles of new designated trails would be created as part of Alternative 2, which would be the same as for the proposed Preferred Alternative (Exhibit 2-4). The proposed Preferred Alternative would not involve replacing the entire length of informal user-created trails that would be removed; however, the new designated trails would be maintained and would provide

better connectivity through the study area than the existing trails. Therefore, the new trails would be of higher quality than the user-created trails that would be removed and would maintain similar recreation opportunities. The proposed recreation trail would share the new bridge with the golf cart path and would then diverge into separate paths on both sides of the river. Therefore, motorized access would be allowed only along a short distance of new trail and across the new bridge. Motorized traffic would not be allowed on other pedestrian trails outside of those areas used for STPUD utility access.

The new portion of the reconfigured golf course would remove 40 acres of Washoe Meadows SP from other recreational uses; however, Washoe Meadows SP currently encompasses 608 acres (including areas outside the study area), and dispersed recreation would continue throughout the reconfigured 568 acres of Washoe Meadows SP. This includes approximately 40 acres that were previously occupied by golf course, including approximately 4,500 feet of river, would become available to trail users, boaters, anglers, and other water recreationists. Non-motorized winter recreationists would continue to have access to areas outside of the driving range, and access to this area would be improved because the bridge would no longer be gated. Snowmobile use would continue to be allowed only on the driving range. The northern portion of Washoe Meadows SP would continue to provide opportunities for dispersed recreation in solitude.

As discussed in Table 3.2-1, “Consistency with Relevant Land Use Plans and Policies,” of the EIR/EIS/EIS, implementing any of the alternatives would provide for low-density recreation in the study area and along the Upper Truckee River. The northern portion of Washoe Meadows SP would remain undeveloped, and dispersed recreation would continue in Washoe Meadows SP under all alternatives. Additional access to the river would be available under Alternatives 2, 3, and 5 as portions of the golf course would be removed and the restored area open to other recreation uses. The proposed Preferred Alternative would include construction of additional trails that would connect to the Sawmill Bike Trail and the corner of Country Club Drive. For these reasons, the proposed Preferred Alternative would be consistent with TRPA goals for dispersed recreation. In addition, as discussed in Table 3.2-1, TRPA has goals and policies related to various resource areas that are all considered during review of any project. Consistency with goals and policies is considered equally for all resource topics, and consistency with one goal or policy (e.g., dispersed recreation) is not valued more highly than consistency with any other goal or policy (e.g., developed recreation, water quality).

## **3.6 CULTURAL RESOURCES**

### **3.6.1 BASELINE CONDITIONS AND FINDINGS USED IN THE ENVIRONMENTAL ANALYSIS**

This master response addresses general comments made on the adequacy, accuracy, and completeness of baseline conditions, mitigations measures, and findings used for significance conclusions in the draft EIR/EIS/EIS and responds to all or part of the following comments: AOB8-9, AOB12-1, AOB13-1, AOB14-1, AOB32-1 through AOB32-6, AOB32-8, AOB33-1, AOB33-2, AOB33-4, AOB33-5, I20-1, I54-4, I64-33, I165-3, I238-3, PM1-19, PM2-62.

As discussed in Section 3.9, “Cultural Resources,” of the draft EIR/EIS/EIS, cultural resource investigations for the project consisted of a phased approach that included Native American consultation, prefield research, field reconnaissance surveys, and resource documentation. All aspects of the 2008 cultural resource study were conducted in accordance with the Secretary of the Interior’s Guidelines for Identification of Cultural Resources (48 Code of Federal Regulations [CFR] 44720–44723).

The analysis was based on a combination of background research, archaeological pedestrian surveys, site investigations, and consultation with the Native American community. Research into potential cultural resources issues began with contacts made with the Washoe Tribe of Nevada and California by State Parks in 2006 for National Register of Historic Places (NRHP) evaluation excavations proposed for archaeological sites CA-Eld-2152, CA-Eld-2157, CA-Eld-2158, and CA-Eld-2160. These sites are contained in portions of the study area and could have been affected by proposed river restoration activities and golf course reconfiguration. Further



consultation with the Washoe Tribe occurred in 2007, also in relation to NRHP evaluation studies (CA-Eld-2156 and CA-Eld-2159).

AECOM cultural resources specialists contacted the Washoe Tribe directly in 2007, and coordination with State Parks is ongoing and will continue through final design. Most importantly, the tribal historic preservation officer for the Washoe Tribe, Mr. Darrel Cruz, has been involved in the planning process and the identification of mitigation for potential impacts on important early Native American cultural resources situated in and in the immediate vicinity of the study area.

AECOM cultural resource specialists, in coordination with State Parks and the U.S. Forest Service Lake Tahoe Basin Management Unit, reviewed archaeological site records and other documents related to all presently documented cultural sites, features, and artifacts located in and near the study area. Although conventional records searches in California are typically conducted through the California Historical Resources Information System (CHRIS), in this case State Parks and the Lake Tahoe Basin Management Unit maintained more extensive and detailed archives for the project site and the overall study area than the CHRIS. In addition, State Parks archaeologist Denise Jaffke has been in regular contact with the Washoe Tribe regarding cultural resources and culturally sensitive locales on and near the project site. This ongoing contact has provided information on ethnographic and recent historic-era Washoe Tribe use of the study area and the surrounding region.

Archaeological surface surveys and subsurface investigations have been conducted in the entire study area. Among these investigations are reconnaissance-level surveys performed by AECOM and State Parks and an intensive cultural resources inventory conducted by Pacific Legacy in the Washoe Meadows SP. Subsurface investigations included the NRHP evaluation reports on the sites noted above. Information derived from these investigations, archival research, and consultation with the Washoe Tribe has provided a highly detailed and up-to-date assessment of the nature and distribution of prehistoric and historic-era sites, features, and artifacts in and near the study area. All this effort was completed after the Lake Valley SRA General Plan was prepared. Therefore, information provided in the 2008 study and draft EIR/EIS/EIS supersedes information in the general plan.

Sites considered significant have been protected through mitigation planned as part of the project, including using buffers, capsulation, adjusting a portion of the proposed golf course boundary to avoid impacts and provide access, monitoring during construction, and maintaining access to some sites dependant on the needs of the Washoe Tribe. All proposed mitigation has been developed in consultation with the Washoe Tribe. Cultural sites are currently vandalized in the study area. Implementation of protection measures, such as use of buffers and capsulation, is expected to reduce the potential for vandalism of cultural sites. Furthermore, as described in Section 3.9, "Cultural Resources," of the draft EIR/EIS/EIS, mitigation is proposed to alleviate potential impacts on as yet undiscovered resources and would be conducted in consultation with the Washoe Tribe. Implementation of Mitigation Measure 3.9-2 would protect potential undiscovered resources by identifying previously undocumented cultural resources before their destruction and providing an opportunity for their preservation in place or for further investigation and the recovery of potential important scientific data that could be used to address regional prehistoric and historic-era research issues.

In addition to ongoing consultation with the Washoe Tribe, Reclamation has consulted with the SHPO in accordance with Section 106 of the National Historic Preservation Act. After review of the project, SHPO made the following findings:

- ▶ The determination of the Area of Potential Effect (APE) is appropriate pursuant to 36 CFR Parts 800.4(a)(1) and 800.16(c), and the effort to identify and evaluate historic properties in the APE represents a reasonable and good-faith effort in accordance with 36 CFR Part 800.4(b)(1).
- ▶ The finding of No Adverse Effect is appropriate pursuant to 36 CFR Part 800.5(b). The concurrence with this finding is predicated on the establishment of monitoring of an Environmentally Sensitive Area with exclusionary fencing around CA-Eld-555; the installation of protective caps (permeable fabric covered by 6 inches of sterile fill and topped with 6 feet of fill material from the golf course redesign) on the deposits of

CA-Eld-2158, CA-Eld-2160, and CA-Eld-2156; and the periodic (annual) monitoring of the effectiveness of these measures.

Implementation of mitigation measures described in Section 3.9, “Cultural Resources,” of the draft EIR/EIS/EIS would protect cultural resources in the study area. Because cultural resources would be protected, all mitigation would be carried out in coordination with the Washoe Tribe. The SHPO has concurred with the finding that the project would have No Adverse Effect on cultural resources and that the project would be consistent with the Archeological Resources Protection Act of 1979 (Appendix L).

## **3.7 ECONOMICS**

### **3.7.1 PROJECT FUNDING AND COST**

This master response addresses comments on the draft EIR/EIS/EIS related to project funding and cost. Comments specifically addressed the sources of funding and requested an estimate of the cost of implementing the project. This section of this master response addresses general comments made related to project funding and cost and responds to all or part of the following comments: AOB5-1, AOB5-10, AOB31-35, AOB31-43, I1-2, I13-9, I18-1, I54-5, I64-20, I64-24, I67-1, I136-1, I149-1, I169-1, I170-2, I173-2, I228-1, I238-2 PM1-8, PM1-16, PM2-2, PM2-3, PM2-5, PM2-54, PM2-61.

State Parks has funding to complete the planning and permitting processes for the project. It will need to seek funding for restoration and implementation of the selected alternative. The cost of river and floodplain restoration would be approximately \$6–8 million. Grant funding for river and SEZ restoration may be acquired through a variety of sources, such as the U.S. Bureau of Reclamation, U.S. Fish and Wildlife Service, and Lahontan RWQCB. The cost to relocate the golf holes under the proposed Preferred Alternative would be an additional \$7–8 million. The golf course is operated by a concessionaire through a contract negotiated with State Parks. The current lease agreement has expired, and State Parks will be accepting bids for the next 20-year lease following finalization of this EIR/EIS/EIS. It is anticipated that much of the cost to relocate golf course holes would be paid for through this future agreement; however, State Parks would receive reduced income from the golf course for several years to offset these costs. State Parks would also consider a potential surcharge on golf fees of \$5–10 to offset some of the costs of relocating golf course holes if the proposed Preferred Alternative is selected.

Funds generated by the Lake Tahoe Golf Course contribute to the State Parks Revolving Fund. The budget for the Sierra District is determined based on contributions to the revolving fund and, therefore, is affected by revenue generated by the Lake Tahoe Golf Course. Revenue generated by the Sierra District covers only approximately 30% of the local operating costs; therefore, State funds are shifted from elsewhere in the State Parks budget to cover a portion of the operating costs in the district. If less revenue is earned in the Sierra District because the golf course is closed or offers reduced play, funds would need to be redistributed from other areas of the State Parks budget to cover operating costs, or maintenance and services in the Sierra District would be reduced.

If the golf course concessionaire cannot cover the costs associated with relocating golf course holes because of the current economic downturn, State Parks would consider delaying relocation of golf course holes and approving a year-to-year contract with the concessionaire. After the economy improves and funding is available, a new contract with the concessionaire could be negotiated that would provide funds for relocating golf course holes.

### **3.7.2 ADEQUACY OF ECONOMIC REPORT**

This master response addresses comments on the draft EIR/EIS/EIS related to the adequacy of the economic analysis report prepared for the project. Comments specifically addressed the scope and methods of the economic analysis. This section of this master response addresses general comments made on the adequacy of the economics analysis report prepared for the project and responds to all or part of the following comments: AOB4-4, AOB8-18,

AOB24-5, AOB30-6, AOB31-33, AOB31-34, AOB31-36 through AOB31-46, I3-1, I64-20, I64-23, I64-27, I64-31, I67-1, I111-6, , I111-7, I111-8, I139-1, I157-5, I176-1, I209-1, PM1-14, PM2-2, PM2-36, PM2-64.

Effects analyzed under CEQA must be related to a physical change in the environment (State CEQA Guidelines Code of California Regulations Section 15358[b]). Economic and social effects are not considered environmental effects under CEQA. These effects need to be considered in an EIR only if they would lead to a significant adverse effect on the physical environment. In addition, neither the TRPA Compact nor the Code of Ordinances requires consideration of economic effects in an EIS. NEPA does require consideration of economic effects (40 CFR 1508.8); however, this requirement is limited to effects that are reasonably foreseeable rather than speculative (Mandelker 2007: 8-102, citing *City of Riverview v. Surface Transp. Bd.*, 398 F 3d 434 [6th Cir. 2005]).

Although not required under CEQA or NEPA, in response to public requests, an economic analysis was prepared for the project to assist in evaluating the economic and socioeconomic effects of the project and to study the feasibility of continued operations at Lake Valley SRA both with and without a golf course, in light of the objectives of the alternatives. The economic analysis examined three scenarios for configuring the golf course:

- ▶ an 18-hole regulation golf facility (with two suboptions, one of which includes potential changes to course layout);
- ▶ a reduced-play-area (nontraditional length, such as a 9-hole or executive course) with all golf activities located on the east side of the river (this scenario is modeled with a range of potential green fees, resulting in a low to high range of financial projections); and
- ▶ no golf course, but retention of the clubhouse for an events facility.

This analysis addressed the revenue and operating expenditures of each scenario, as well as the changes in revenues to be received by State Parks, changes in revenues to be received by the concessionaire, and economic impacts on the surrounding community. The resulting report, the *Lake Tahoe Golf Course Economic Feasibility Analysis*, does not provide an exhaustive evaluation of all potential future uses and scenarios for the study area but provides a reasonable range of scenarios that allow for comparisons and informed decision making. As stated in the report, it should not be relied on as sole input for decision making. For this reason, State Parks has used the information provided in the report in combination with information provided in the draft EIR/EIS/EIS and other technical studies and other available information for the project to select the preferred alternative. Relevant economic, environmental, social, technological, and other considerations are all taken into account and balanced to the extent possible when selecting a preferred alternative.

Methods and assumptions used to prepare the *Lake Tahoe Golf Course Economic Feasibility Analysis* are supported by analysis provided in the economic report and are considered accepted methods for the type of economic analysis conducted for the project. Multiple methods and assumptions could be considered acceptable when evaluating economic impacts. Commenters disagreed with methods and assumptions used in the economic analysis; however, no alternative methods or assumptions were offered by commenters. Although more recent economic data may be available, the economic analysis used the best available data at the time the report was prepared.

For these reasons, State Parks considers the economic analysis prepared for the project to be adequate for allowing informed decision making related to the project.

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# 4 COMMENTS AND INDIVIDUAL RESPONSES

## 4.1 INTRODUCTION

This chapter contains the comment letters received on the August 2010 draft environmental impact report/environmental impact statement/environmental impact statement (2010 draft EIR/EIS/EIS) for the Upper Truckee River Restoration and Golf Course Reconfiguration Project, and the responses to those comments. As noted in Section 4.2, the comments and related responses have been organized to help track the nature and origin of the hundreds of comments received and considered in the preparation of this final EIR/EIS/EIS. Each of the commenters on the 2010 draft EIR/EIS/EIS, their associated agencies or affiliations, and specific assigned letter/comment identifications are listed in Section 4.3. Section 4.4 presents each of the comment letters received on the 2010 draft EIR/EIS/EIS including three form letters signed by numerous individuals; comments made during the public hearings on the project held on October 13 and 27, 2010; and the responses to those comments.

## 4.2 FORMAT OF COMMENTS AND RESPONSES

Comment letters and responses to comments are arranged in the following order:

- ▶ Section A: Agencies, Businesses, and Organizations
- ▶ Section B: Individuals
- ▶ Section C: Public Meeting
- ▶ Section D: Form Letters

Each letter and each comment within a letter have been given an identification number. Responses are numbered so that they correspond to the appropriate comment. Where appropriate, responses are cross-referenced between letters or with a master response.

## 4.3 LISTS OF COMMENTERS

### 4.3.1 COMMENTERS ON THE 2010 DRAFT EIR/EIS/EIS

Table 4-1 provides a list of all agencies and persons who submitted comments on the 2010 draft EIR/EIS/EIS and who commented on that document during the public hearing.

<b>Table 4-1 List of Commenters on the 2010 Draft EIR/EIS/EIS</b>		
<b>Letter ID</b>	<b>Commenter</b>	<b>Date</b>
<b>Section A. Agencies, Organizations, and Businesses</b>		
AOB-1	BEAR League: Bear Education Aversion Response Ann Bryant and the BEAR League Board	November 13, 2010
AOB-2	California Trout Jenny Francis-Hatch, Northern Sierra Regional Director	October 27, 2010
AOB-3	City of South Lake Tahoe, Public Works Department, Engineering Division Jennifer Taylor, Assistant Engineer	November 10, 2010
AOB-4	Defense of Place Nancy Graalman, Director	November 15, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section A. Agencies, Organizations, and Businesses (cont'd)</b>		
AOB-5	U.S. Environmental Protection Agency, Region 9 Kathleen M. Gogorth, Manager, Environmental Review Office (CED-2), Communities and Ecosystems Division	November 1, 2010
AOB-6	Heavenly Mountain Resort Casey Blann, Vice President, Mountain Operations	October 26, 2010
AOB-7	Heavenly Mountain Resort Tom Fortune, Director, Mountain Operations	October 25, 2010
AOB-8	Kenyon-Yeates LLP Bill Yeates	November 15, 2010
AOB-9	Live Oak Associates, Inc. Rick A. Hopkins, Ph.D., Principal and Senior Conservation Biologist	November 12, 2010
AOB-10	Lake Tahoe Visitors Authority Mike Frye, Sales and Events Manager	October 26, 2010
AOB-11	California Regional Water Quality control Board, Lahontan Region Lauri Kemper, P.E., Assistant Executive Officer	November 15, 2010
AOB-12	Keep Tahoe Blue, League to Save Lake Tahoe Nicole Gergans, Environmental Program Advocate	October 6, 2010
AOB-13	Keep Tahoe Blue, League to Save Lake Tahoe Nicole Gergans, Environmental Program Advocate	October 26, 2010
AOB-14	Keep Tahoe Blue, League to Save Lake Tahoe Nicole Gergans, Environmental Program Advocate	November 15, 2010
AOB-15	Lake Tahoe Visitors Authority, South Shore Patrick Ronan, Chair	October 7, 2010
AOB-16	Lake Tahoe Visitors Authority, South Shore Mindi Befu, Chair – Lake Tahoe Visitors Authority Marketing Committee	October 29, 2010
AOB-17	Meyers Community Roundtable Committee Sue Novasel, Chair	October 6, 2010
AOB-18	Midkiff and Associates, Inc. Gary D. Midkiff, Principal	October 26, 2010
AOB-19	State of California Native American Heritage Commission Katy Sanchez, Program Analyst	September 2, 2010
AOB-20	State of Nevada Department of Conservation and Natural Resources, Division of Environmental Protection Jason Kuchnicki	November 4, 2010
AOB-21	Resource Renewal Institute David Katz, Project Manager	November 12, 2010
AOB-22	South Lake Tahoe Lodging Association and Tourism Improvement District Jerry Bindel, Chairman	October 29, 2010
AOB-23	Sierra-at-Tahoe and Northstar-at-Tahoe Resorts Kirstin A. Cattell, Marketing and Communications Manager	October 6, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section A. Agencies, Organizations, and Businesses (cont'd)</b>		
AOB-24	Sierra Club, Tahoe Area and Mother Lode Chapter Bob Anderson, Executive Committee – Tahoe Area, Sierra Club and Terry Davis, Conservation Program Coordinator – Mother Lode Chapter, Sierra Club	November 15, 2010
AOB-25	South Tahoe Association of Realtors (STAR) Theresa Souers, 2010 President on behalf of STAR Board of Directors	November 4, 2010
AOB-26	Tahoe-Douglas Visitors Authority John Packer	September 27, 2010
AOB-27	Trout Unlimited David Lass, Northern California Field Director, Sportsman Conservation Project	November 7, 2010
AOB-28	Washoe Meadows Community Lynne Paulson	October 1, 2010
AOB-29	Washoe Meadows Community Lynne Paulson	October 8, 2010
AOB-30	Washoe Meadows Community Lynne Paulson	October 13, 2010
AOB-31	Washoe Meadows Community Lynne Paulson	November 15, 2010
AOB-32	Washoe Tribe of Nevada and California, Cultural Resources Office/Tribal Historic Preservation Office Darrel Cruz	September 14, 2010
AOB-33	Washoe Tribe of Nevada and California Waldo W. Walker, Chairman	November 11, 2010
<b>Section B. Individuals</b>		
I1	John Adamski	November 15, 2010
I2	Eric Adema	November 1, 2010
I3	Daniel Albanese	November 14, 2010
I4	Jenny Albanese	November 14, 2010
I5	Rick Alexander	October 27, 2010
I6	Rick Alexander	November 14, 2010
I7	David & Lori Alessio	October 23, 2010
I8	Richard Anderson	November 7, 2010
I9	Harold Anino	September 19, 2010
I10	Patricia Ardavany	September 27, 2010
I11	Patrick Atherton	November 7, 2010
I12	Rob Ayers	October 19, 2010
I13	Robert J. Baiocchi	November 15, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I14	Bob Barneson	September 4, 2010
I15	Fred Barry	November 4, 2010
I16	Andrew Bass	October 18, 2010
I17	Jeff Bell	September 4, 2010
I18	Stew & Hillary Bittman	November 1, 2010
I19	Stephen Blonski	October 12, 2010
I20	Debbie & John Bolce	November 7, 2010
I21	Laurie Brazil	September 30, 2010
I22	Mike Brink	October 24, 2010
I23	Sherie Brubaker	September 20, 2010
I24	Dave Burba	November 5, 2010
I25	Royal Bush	September 21, 2010
I26	Dave Carneggie	August 27, 2010
I27	Carol Carson	September 11, 2010
I28	Greg Case	August 31, 2010
I29	Greg Case	September 20, 2010
I30	John Castellanos	October 12, 2010
I31	Amy Cecchettini	November 1, 2010
I32	Carol Chaplin	October 4, 2010
I33	Barbara Childs	October 29, 2010
I34	J.P. Christensen	November 4, 2010
I35	Phyllis Clifton	October 6, 2010
I36	David Cloutier	October 30, 2010
I37	Doug Clymer	October 29, 2010
I38	Theresa Cody	November 15, 2010
I39	Larry Coffman	September 16, 2010
I40	Larry Coffman	October 12, 2010
I41	Barbara & Roger Copeland	September 22, 2010
I42	William G. Copren	November 14, 2010
I43	Jennifer Culp	September 5, 2010
I44	John Curtis	August 26, 2010
I45	John Curtis	September 22, 2010
I46	Tim Dallas	November 4, 2010



**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I47	Carol Daum	September 22, 2010
I48	Greg Daum	October 18, 2010
I49	Jake Daum	October 18, 2010
I50	Dave Davis	August 31, 2010
I51	John Dayberry	August 30, 2010
I52	John Dayberry	November 15, 2010
I53	Tom & Debbie Deeble	November 14, 2010
I54	Hillary Dembroff	October 23, 2010
I55	Hillary Dembroff	November 3, 2010
I56	Dave DeStefano	October 22, 2010
I57	Richard DeVries	August 30, 2010
I58	Neil G. Dion	November 14, 2010
I59	Brad Dorton	October 30, 2010
I60	John Drum	October 22, 2010
I61	Kathleen Eagan	October 29, 2010
I62	Derek Edridge	October 5, 2010
I63	Don & Kay Edwards	October 22, 2010
I64	David & Carla Ennis	November 14, 2010
I65	Carl Fair	October 5, 2010
I66	Emilio Ferrer	November 15, 2010
I67	Chick Fraunfelter	October 28, 2010
I68	John Garofalos	October 18, 2010
I69	Jerry & Marcia Gaudet	November 2, 2010
I70	Jeff Glass	November 12, 2010
I71	John Gooding	September 11, 2010
I72	John Gooding	October 23, 2010
I73	John Gooding	November 5, 2010
I74	Kimberly Gorman	October 24, 2010
I75	Kimberly Gorman	November 15, 2010
I76	C.V. Griffith	November 3, 2010
I77	Greta Hamsch	November 14, 2010
I78	Diana Hamilton-Smith	November 15, 2010
I79	Patricia M. Handal, DVM	August 30, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I80	Judith Hanson, MBA	October 29, 2010
I81	Paul Hardy	November 15, 2010
I82	Angela Harney	November 15, 2010
I83	Teresa Harrigan	August 30, 2010
I84	Donald C. Harriman	November 12, 2010
I85	Roxene Harrison	September 17, 2010
I86	John Hartzell	September 4, 2010
I87	John Hartzell	October 23, 2010
I88	Douglas & Joan Hazlett	August 25, 2010
I89	Douglas Hazlett	September 8, 2010
I90	Douglas Hazlett	September 22, 2010
I91	Gunnar Henriouille	September 11, 2010
I92	Ann Marie Henriouille	October 22, 2010
I93	Alan Heyvaert, Ph.D.	November 3, 2010
I94	Larry & Gail Hobson	October 15, 2010
I95	Jon Hoefer	October 26, 2010
I96	Kirk Hopkin	October 18, 2010
I97	Kirk Hordin	November 3, 2010
I98	Rob Hordzwick	November 4, 2010
I99	Peter Illing	October 12, 2010
I100	Nicole M. Jane, DDS MS	October 22, 2010
I101	Daniel Jensen	November 11, 2010
I102	Curtis John	August 26, 2010
I103	Curtis John	September 22, 2010
I104	Georgene John	August 26, 2010
I105	Brian Johnson	October 18, 2010
I106	Michael K. Johnson	October 26, 2010
I107	katzino6	October 19, 2010
I108	Robert Kay	September 2, 2010
I109	Michelle Keck	October 29, 2010
I110	Greg Kennedy	November 6, 2010
I111	John Klimaszewski	November 14, 2010
I112	Mike Klover	August 25, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I113	Mike Klover	October 27, 2010
I114	Alfred Knotts	October 27, 2010
I115	Mark Koffman	October 1, 2010
I116	Norm Kosco	August 27, 2010
I117	Greg Kuntz	November 4, 2010
I118	Michelle Lam	October 21, 2010
I119	Keith Latta	August 27, 2010
I120	L.J. Laurent	September 8, 2010
I121	Denise LeBiavant	October 17, 2010
I122	Debbie Ledbetter	August 31, 2010
I123	Charles Lincoln	October 18, 2010
I124	Michael & Ileene Lipkin	October 23, 2010
I125	Wayne Logan	August 27, 2010
I126	Mary Magana	September 9, 2010
I127	Tom & Debbie Makris	November 8, 2010
I128	Jerry & Cathy Martin	October 27, 2010
I129	Richard Matera	September 8, 2010
I130	Matt	September 24, 2010
I131	Kyle Mazzoni	August 27, 2010
I132	Tim Mazzoni	August 24, 2010
I133	Tim Mazzoni	September 21, 2010
I134	Tim Mazzoni	October 18, 2010
I135	Richard McCallan, PE	November 8, 2010
I136	John McDougall	November 13, 2010
I137	George McKool	September 1, 2010
I138	Ken McNutt	October 5, 2010
I139	Gary Mendel	August 26, 2010
I140	Gary Mendel	August 27, 2010
I141	Gary Mendel	September 8, 2010
I142	Linda & Bob Mendizabal	October 22, 2010
I143	Terry A. Mitchell	November 1, 2010
I144	Gary Moore	October 6, 2010
I145	Linda Moore	October 12, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I146	Jim Morocco	September 3, 2010
I147	Larry Mortensen	September 1, 2010
I148	Sarah Muskopf	November 8, 2010
I149	Paul Nanzig	October 29, 2010
I150	Paul & Jenee Nanzig	October 4, 2010
I151	Aysin & Bruce Neville	August 30, 2010
I152	Michael O. Newberger	November 1, 2010
I153	Robert Nichols	November 4, 2010
I154	Bob Niedermeier	October 30, 2010
I155	S. Noll	October 7, 2010
I156	Annaleigh Novak	September 6, 2010
I157	Lisa O'Daly	no date
I158	Rachel Odneal	October 10, 2010
I159	Zachary Ormsby	November 15, 2010
I160	Rose & Jeff Ottman	September 21, 2010
I161	Julie Parker	November 8, 2010
I162	Vern & Mary Parker	September 5, 2010
I163	Mike Patterson	August 24, 2010
I164	Mike Patterson	October 13, 2010
I165	Lynne Paulson	November 15, 2010
I166	Gordon & Pamela Perry	September 30, 2010
I167	Glenn & Barbara Pershing	November 14, 2010
I168	Rob Peterson	October 29, 2010
I169	Beverly Pevarnick	November 2, 2010
I170	Dennis Pevarnick	October 21, 2010
I171	Maria A. Pielaet, MD	October 20, 2010
I172	Benjamin Pignatelli	September 3, 2010
I173	Benjamin Pignatelli	October 5, 2010
I174	Barbara Randolph	October 6, 2010
I175	David Reichel	November 10, 2010
I176	Ron C. Rettus	August 20, 2010
I177	Ron C. Rettus	August 24, 2010
I178	Steve Ricioli	September 9, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I179	JoAnn Robbins	November 15, 2010
I180	Mike Robinson	November 3, 2010
I181	Art Rodriguez	October 7, 2010
I182	Michael Rogan	October 13, 2010
I183	Patrick Ronan	October 19, 2010
I184	Cookie Rork	October 15, 2010
I185	Doug Rosner	October 29, 2010
I186	Doug Ross	September 22, 2010
I187	Doug Ross	November 4, 2010
I188	Heather Ross	November 2, 2010
I189	Ronald Rumble	November 4, 2010
I190	Caleb Russell	November 10, 2010
I191	Glenn Russell	November 12, 2010
I192	Krissi Russell	November 9, 2010
I193	Derek Rust	October 12, 2010
I194	James L. Ryan	October 18, 2010
I195	Dorothy Salant	September 19, 2010
I196	Dorothy Salant	November 3, 2010
I197	Jim Sanfelice	November 10, 2010
I198	David and Andi Sannazzaro	November 11, 2010
I199	John Sattler	September 22, 2010
I200	Natasha Kidman Schue	October 21, 2010
I201	Karenina Schuller	September 28, 2010
I202	Monica Sciuto	October 20, 2010
I203	Janet Seidman-Domas	September 2, 2010
I204	Coleen Shade	October 6, 2010
I205	Dick Shehadi	October 12, 2010
I206	Dick & Wendy Shehadi	September 5, 2010
I207	Lynda Shoshone	November 15, 2010
I208	Fritz Siegethaler	November 8, 2010
I209	Lisa Sinizer	November 14, 2010
I210	Carole Songey-Watson	October 4, 2010
I211	Ron Spurrell	August 25, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Section B. Individuals (cont'd)</b>		
I212	Jim Stamates	November 9, 2010
I213	Kim Stephenson	November 3, 2010
I214	Robert Stiles	October 28, 2010
I215	Keri Strategier	October 30, 2010
I216	Martha Sullivan	September 4, 2010
I217	Steve Szekely	September 26, 2010
I218	Shirley Taylor	September 14, 2010
I219	Anne Thomas	November 15, 2010
I220	Kirk Thompson	September 1, 2010
I221	Kirk Thompson	October 20, 2010
I222	Maddelyn Thran	September 2, 2010
I223	Jane Turney	October 30, 2010
I224	John Upton	October 29, 2010
I225	userramp	August 24, 2010
I226	Scott Valentine	October 17, 2010
I227	Cindy Van Arnum	October 8, 2010
I228	Walter	September 8, 2010
I229	Steve Weiss	August 26, 2010
I230	Steve Weiss	September 27, 2010
I231	John S. Williamson	November 15, 2010
I232	Amber Wilson, MS RD	October 8, 2010
I233	Matt Wilson	October 7, 2010
I234	Judy Witte	October 31, 2010
I235	Russell Wright	September 9, 2010
I236	Natalie Yanish	October 29, 2010
I237	Steve Yonker	October 2, 2010
I238	Nicole Zaborsky	November 15, 2010
I239	Liana Zambresky	September 6, 2010
I240	Liana Zambresky	October 4, 2010
<b>Form Letters</b>		
F1	Glenn Affleck	October 24, 2010
	Clifford Aggen	October 18, 2010
	David Agles	October 18, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters (cont'd)</b>		
	Branden Allred	October 18, 2010
	Christopher Ames	October 23, 2010
	Russell Amos	October 18, 2010
	Glen Anderson	October 19, 2010
	Richard Anderson	October 18, 2010
	Stephen Anderson	November 2, 2010
	Zenjala Anderson	October 25, 2010
	John Arndt	October 27, 2010
	Allen Aronson	October 18, 2010
	Bruce Ashley	October 21, 2010
	Dale Atherton	October 20, 2010
	Ron Azevedo	October 19, 2010
	J. Baily	October 20, 2010
	Doug Ballinger	October 19, 2010
	Richard Banks	October 18, 2010
	Chris Barger	October 18, 2010
	John Barry	October 18, 2010
	Keith Barton	October 19, 2010
	Charles Batts	October 18, 2010
	Nicolas Bauer	October 18, 2010
	Jeanne-Marie Baxter	October 18, 2010
	Fred Bello	October 28, 2010
	Vincent Berry	October 18, 2010
	Paul Bettelheim	October 18, 2010
	Dan Beveridge	October 27, 2010
	Alan Billotte	October 18, 2010
	Ray Binner	October 28, 2010
	John Black	October 18, 2010
	Torry Blickle	October 18, 2010
	Mike Bobbitt	October 18, 2010
	Lea Bond	October 19, 2010
	Robert Bonfilio	October 18, 2010
	Mike Bonifacio	October 19, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Mark Borchert	October 18, 2010
	Jason Bowman	October 20, 2010
	Darrell Boyle	October 19, 2010
	Craig Bradshaw	October 24, 2010
	Holden Brink	October 24, 2010
	John Brinkley	October 18, 2010
	Robert Britton	October 18, 2010
	Tony Brookfield	October 19, 2010
	Gerald L. Brooks	October 18, 2010
	Gary Brugman	October 19, 2010
	Jed Burns	October 18, 2010
	Chuck Cadman	October 28, 2010
	Dennis Cakebread	October 18, 2010
	Michael Calkins	October 19, 2010
	Jack Campbell	October 18, 2010
	Michael Carlson	October 19, 2010
	Ken Carpenter	October 19, 2010
	Christopher Carolab	October 18, 2010
	Patrick Carroll	October 19, 2010
	Tom Carson	October 18, 2010
	Bruce Carter	October 20, 2010
	Larry Cebull	October 19, 2010
	Scott Cecchi	October 19, 2010
	Mark Cedarwall	October 24, 2010
	Morley Chandler	October 26, 2010
	Robert Chang	October 18, 2010
	Robert Christensen	October 19, 2010
	Alan Christian	October 19, 2010
	Jack Christianson	October 19, 2010
	Matthew Clark	October 18, 2010
	Neil Clipperton	October 18, 2010
	Kenneth Cochrane	October 18, 2010
	Doug Cole	October 19, 2010



**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Alan Colombano	October 19, 2010
	Chri Cordano	October 19, 2010
	George Coughlin	October 23, 2010
	Paul Crafts	October 18, 2010
	Paul Cress	October 18, 2010
	Chris Crofford	October 23, 2010
	Ash Daggs	October 19, 2010
	Scott Dansie	October 18, 2010
	Bruce Dau	October 18, 2010
	George De Kay	October 18, 2010
	Thomas Deetz	October 23, 2010
	Larry Dennis	October 19, 2010
	Richard Desrosiers	October 19, 2010
	Lim DeSwarte, Jr.	October 18, 2010
	Timothy Devine	October 23, 2010
	Sonia Dinger	October 20, 2010
	Dustan Dockter	October 18, 2010
	John Dolinsek	October 19, 2010
	Michael Dresen	October 18, 2010
	Thomas Driskill	October 18, 2010
	Adam Dwinells	October 19, 2010
	Daniel Eckard	October 18, 2010
	Kalman Edelman	October 18, 2010
	Harold Ekman	October 18, 2010
	Leonard Ely	October 19, 2010
	Ned Engle	October 19, 2010
	Philip Erickson	October 18, 2010
	Kent Estabrook	October 18, 2010
	Dinda Evans	October 20, 2010
	Vivian Fahlgren	October 18, 2010
	John Faivre	October 18, 2010
	Robert Fallon	October 19, 2010
	Teresa Fantasia	October 18, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Devin Farrell	October 18, 2010
	Lawrence Ferderber	October 18, 2010
	Michael Ferguson	October 29, 2010
	John Ferrell	October 19, 2010
	Ed Filice	October 18, 2010
	Robert Fisher	October 19, 2010
	Pierce Flynn	October 18, 2010
	John Fowler	October 18, 2010
	Jonah Freedman	October 18, 2010
	Louis Fry	October 18, 2010
	Gene Gantt	October 20, 2010
	Filipe Garcia	November 1, 2010
	Dr. William Gardner	October 19, 2010
	John Garraway	October 18, 2010
	David Gates	October 19, 2010
	Doug Gayner	October 18, 2010
	Kenneth Giannotti	October 19, 2010
	Wayne Ginsburg	October 18, 2010
	David Goeddel	October 18, 2010
	Wade Goertz	October 18, 2010
	Alan Goggins	October 18, 2010
	Dayrl Goldstein	October 19, 2010
	Bob Gomez	October 18, 2010
	Wade Graham	October 19, 2010
	David Gray	October 18, 2010
	Don Griffiths	October 19, 2010
	James Grizzell	October 18, 2010
	Malcome Groome	October 19, 2010
	Alex Gutt	October 18, 2010
	Dennis Hall	October 18, 2010
	Robert Hall	October 21, 2010
	Charles Hammerstad	October 19, 2010
	James Hansell	October 27, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters (cont'd)</b>		
	Richard Harvey	October 18, 2010
	Sarah Hatten	October 18, 2010
	Terrence Hayes	October 25, 2010
	George Hayford	October 18, 2010
	Terry Heffernan	October 18, 2010
	Mitch Hendrickson	October 31, 2010
	Ed Heneveld	October 19, 2010
	Jeff Henigan	October 18, 2010
	Scott Holtslander	October 18, 2010
	Kirk Hopkin	October 18, 2010
	Jim Horning	October 24, 2010
	John Hudson	October 19, 2010
	Sarah Hugdahl	October 19, 2010
	Timothy Hunt	October 18, 2010
	Libby Ingalls	October 25, 2010
	Jim Isaacson	October 18, 2010
	Richard Ishikawa	October 18, 2010
	Richard James	October 18, 2010
	Marty Jansen	October 19, 2010
	David Johnson	October 24, 2010
	Dennis Johnson	October 23, 2010
	Justin Johnson	October 18, 2010
	Paul Johnson	October 23, 2010
	Bob Johnston	October 18, 2010
	Greg Jones	October 19, 2010
	M. Jordan	October 19, 2010
	Darrell Kaff	October 20, 2010
	Michael Kalinowski	October 19, 2010
	Matthew Kane	October 18, 2010
	Kenneth Kanine	October 18, 2010
	Katherine Karriker-Jaffe	November 1, 2010
	Don Kennelly	October 18, 2010
	Larry Kenny	October 19, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Ken Kerley	October 18, 2010
	Curt Kerrick	October 18, 2010
	Marc Kiefer	October 20, 2010
	Ron Kilbourne	October 19, 2010
	Amy Kileen	October 18, 2010
	Mark King	October 18, 2010
	William King	October 19, 2010
	Laurie Kirk	October 20, 2010
	Thomas Klein	October 18, 2010
	Peter Klosterman	October 20, 2010
	John Koene	October 18, 2010
	John Kolarik	October 18, 2010
	Jerry Krohn	October 19, 2010
	K. Krupinski	October 18, 2010
	Kevin Kuhn	October 18, 2010
	Kevin Kuhn	October 29, 2010
	Dean Kuvelis	October 18, 2010
	David Lahti	October 18, 2010
	Jimmy Lamb	October 18, 2010
	Deborah Lancman	October 18, 2010
	Robert Larson	October 19, 2010
	Tim LaVerne	October 18, 2010
	Edward Laveroni	October 24, 2010
	Candy LeBlanc	October 18, 2010
	Pam Levitus	October 19, 2010
	Walt Levitus	October 18, 2010
	Christopher Lima	October 19, 2010
	Gary Lipking	October 18, 2010
	David Lipscomb	October 18, 2010
	Colleen Lobel	October 18, 2010
	David Lonegran	November 3, 2010
	David Lonergan	October 26, 2010
	Gabriel Lopez	October 19, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Rose Lord	October 18, 2010
	Jeff Lorelli	October 19, 2010
	Ray Lorensen	October 20, 2010
	David Lougee	October 19, 2010
	Richard Luczynski	October 19, 2010
	John Marcacci	October 30, 2010
	Joseph Marcotte	October 19, 2010
	Maurice Marcus	October 18, 2010
	Wayne Marion	October 18, 2010
	Allan Marshall	October 29, 2010
	Thomas Martin	October 18, 2010
	Grace Marvin	October 30, 2010
	Matt Mason	October 19, 2010
	Kirk Mathew	October 18, 2010
	Russell Mcburney	October 18, 2010
	Byron McCulley	October 18, 2010
	Frank McDowell	October 18, 2010
	Stu McFarland	October 18, 2010
	Steve McIntire	October 19, 2010
	Laurel McKeever	October 18, 2010
	Gwen McKenzie	October 18, 2010
	Michael McKibben	October 18, 2010
	Steve Mesa	October 19, 2010
	Timothy Metz	October 18, 2010
	Clifford Meyer	October 19, 2010
	Peter Michaelides	October 19, 2010
	James Miller	October 25, 2010
	Jim Miller	October 18, 2010
	Larry Miller	October 19, 2010
	James Milligan	October 18, 2010
	Jim Molinari	October 20, 2010
	Mark Momberg	October 20, 2010
	Steve Monell	October 19, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Gregory Moore	October 19, 2010
	David Morris	October 19, 2010
	John Morris	October 19, 2010
	Maynard Morvay	October 18, 2010
	Mark Moskowitz	October 19, 2010
	Paul Mouriski	October 19, 2010
	Colleen Muelchi	October 18, 2010
	Rex Murphy	October 18, 2010
	Jim Naughton	October 18, 2010
	Fred Naylor	October 19, 2010
	Stephen Neff	October 19, 2010
	Ron Neighbors	October 20, 2010
	Gregory Nelson	October 19, 2010
	James Nemechek	October 18, 2010
	Jim Newhoff	October 18, 2010
	R. Davin Norene	October 23, 2010
	Chuck Oden	October 21, 2010
	Stanley Ohara	October 18, 2010
	John O'Hern	October 20, 2010
	Theodore O'Hirok	October 23, 2010
	Stephen Oldfield	October 19, 2010
	Aaron Osmonson	October 18, 2010
	Dennis Pagones	October 18, 2010
	Mark Palmer	October 19, 2010
	Marguerite Panzica	October 19, 2010
	Jim Parks	October 20, 2010
	Steve Patchin	October 18, 2010
	George Patterson	October 18, 2010
	William Peakes	October 19, 2010
	Jean Pechin	October 19, 2010
	Joaquin Perea	October 18, 2010
	Stephen Perriera	October 20, 2010
	David Peterson	October 18, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters (cont'd)</b>		
	Kimberley Peterson	October 18, 2010
	William Petrick	October 18, 2010
	Corley Phillips	October 19, 2010
	Rob Phillips	October 19, 2010
	Timothy Polishook	October 27, 2010
	Ryan Popple	October 18, 2010
	Jim Prola	October 18, 2010
	Rudy Ramp	October 18, 2010
	Jeff Ramsdell	October 20, 2010
	Robert Redding	October 23, 2010
	John Rees	October 18, 2010
	Diane Rehn	October 19, 2010
	Jeff Reid	October 18, 2010
	Randy Renick	October 18, 2010
	Randy Renick	November 1, 2010
	Michael Rettie	October 19, 2010
	Jerry Reynolds	October 19, 2010
	Dr. Alice Rich	October 20, 2010
	Kieran Ringgenberg	October 18, 2010
	Jack Robbins	October 26, 2010
	Walt Robinson	October 23, 2010
	Carl Roner	October 20, 2010
	Emanuel Rose	October 25, 2010
	Robert Rosenberg	October 18, 2010
	Al Ross	October 25, 2010
	John Rotticci	October 18, 2010
	Julie Rylak	October 20, 2010
	Cynthia Sabatini	October 28, 2010
	Carl Salmonsén	October 19, 2010
	Richard Sander	October 18, 2010
	Mark Sapiró	October 24, 2010
	Richard Saunders	October 18, 2010
	Robert Sawyer	October 25, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters (cont'd)</b>		
	Kathleen Schaefer	October 18, 2010
	M.J. Schaer	October 18, 2010
	Jeff Schillings	October 19, 2010
	Richard Schoen	October 18, 2010
	Tony Schopp	October 19, 2010
	Paul Schorr	November 3, 2010
	Steve Schramm	October 18, 2010
	Alex Schug	October 20, 2010
	Whitney Schutt	October 19, 2010
	David Sesline	October 18, 2010
	Larry Shelburne	October 18, 2010
	David Shinn	October 18, 2010
	Robert Sibbitt	October 19, 2010
	Dan Silver	October 18, 2010
	Robert Simas	October 30, 2010
	John Simler	October 25, 2010
	Philip Simon	October 25, 2010
	Seymore Singer	October 18, 2010
	Gary Slade	October 19, 2010
	Donald Smith	October 23, 2010
	Greg Someson	October 23, 2010
	K. Sonada	October 18, 2010
	Sonja Sorbo	October 18, 2010
	Tom Steele	October 19, 2010
	Peter Steinhart	October 19, 2010
	Terry Sternburg	October 18, 2010
	Kathryn Stewart	October 25, 2010
	John Stiegler	October 18, 2010
	Loretta Strickland	October 19, 2010
	Swanson	October 18, 2010
	Tim Swihart	October 18, 2010
	Stephen Szabo	October 18, 2010
	Ron Szymanski	October 19, 2010



**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters (cont'd)</b>		
	James D. Taylor	October 20, 2010
	David Theis	October 18, 2010
	Robert Theys	October 18, 2010
	Arthur Thielen	October 23, 2010
	Greg Thomson	October 25, 2010
	Michael Tomlinson	October 18, 2010
	Lazlo Toth	October 18, 2010
	Jeff Trafican	October 18, 2010
	Virginia Trainor	October 23, 2010
	Robert Tranter	October 18, 2010
	Tom Vandenberg	October 18, 2010
	Alan Vidinsky	October 24, 2010
	Dan Waligora	October 27, 2010
	Jonathan Walker	October 18, 2010
	Charles Ward	October 18, 2010
	W. Watt	October 19, 2010
	Larry Weaver	October 19, 2010
	Adam Weidenbach	October 23, 2010
	James Weil	October 23, 2010
	Stuart Weinstein	October 23, 2010
	Gerald Weisbach	October 18, 2010
	David Welch	October 18, 2010
	Thomas Weseloh	October 24, 2010
	Richard West	November 4, 2010
	Bill Wickliffe	October 19, 2010
	Barry Wiedemann	October 18, 2010
	Rick Wiggins	October 19, 2010
	Roger Wilcox	October 30, 2010
	Allen Williams	October 19, 2010
	Guy Williams	October 18, 2010
	Jason Williams	October 19, 2010
	Scott Williams	October 20, 2010
	Bryan Willis	October 18, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters</b>	<b>(cont'd)</b>	
	Baron Wolf	October 18, 2010
	Rev. Jeffrey Womble	October 18, 2010
	Brian Wright	October 18, 2010
	Randy Wulbern	October 18, 2010
	John Wyro	October 18, 2010
	Jerome Yesavage	October 24, 2010
	Mark York	October 18, 2010
	Cheryle Young	October 19, 2010
	Gerald Young	October 25, 2010
	Sue Young	November 4, 2010
	Harvey Zeidweg	October 19, 2010
	Paula Zerzan	October 18, 2010
F2	Dustin Anino	September 20, 2010
	Laurie Anino	September 20, 2010
	Melissa Anino	September 22, 2010
	Alvin Bartley	September 27, 2010
	Stan Bobman	September 27, 2010
	Richard Brown	September 27, 2010
	Bill Chambers	September 27, 2010
	Larry Coffman	September 27, 2010
	Perry Damon	September 27, 2010
	Curt Emrie	September 27, 2010
	Jim Getz	September 20, 2010
	Robert Harms	September 27, 2010
	Otto Hefner	September 27, 2010
	Siegfried Heidemann	September 27, 2010
	Philip Hempler	September 27, 2010
	Karl Keller	September 27, 2010
	Dave Kimberling	September 21, 2010
	John Lilygren	September 27, 2010
	Joe McKenna	September 27, 2010
	Richard Miller	September 27, 2010
	Randall Neece	September 27, 2010

**Table 4-1  
List of Commenters on the 2010 Draft EIR/EIS/EIS**

Letter ID	Commenter	Date
<b>Form Letters (cont'd)</b>		
	Gladys Norbriga	September 27, 2010
	Louis Nobriga	September 27, 2010
	S. Pannozzo	September 27, 2010
	Allen Petel	September 27, 2010
	Joyce Peterson	September 27, 2010
	Alida Pohl	September 27, 2010
	Pat Pohl	September 27, 2010
	James Price	September 27, 2010
	Richard Price	September 27, 2010
	R. Rathbun	September 27, 2010
	Carmen Santee	September 27, 2010
	Joe Scott	September 27, 2010
	Dotti Smith	September 20, 2010
	Will Smith	September 20, 2010
	Gina Stanley	September 27, 2010
	Ray Stanley	September 20, 2010
	Tom Teders	September 27, 2010
	Joe Timko	September 27, 2010
	Dick Ziker	September 20, 2010
F3	Todd Veale	September 22, 2010
	Jim Walsh	September 22, 2010
	Maureen Walsh	September 22, 2010
<b>Public Meetings</b>		
PM1	Advisory Planning Commission Meeting	October 13, 2010
PM2	TRPA Governing Board Meeting	October 23, 2010

## 4.4 COMMENTS AND RESPONSES ON THE 2010 DRAFT EIR/EIS/EIS

## **SECTION A**

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### Agencies, Businesses, and Organizations

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# **BEAR League**

Bear Education Aversion Response

P.O. Box 393 Homewood, CA 96141 (530) 525-P

AOB-1

## **Board of Directors**

*Executive Director*  
**Ann Bryant**

*President*  
**Fran Gerhardy**

*Secretary*  
**Laura Seligman**

*Treasurer*  
**Bill Edic, CPA**

*Board Member*  
**Cheryl Millham**  
**Carole Edic**  
**Kathy Davison**

*Board Member Emeritus*  
**Louie Gerhardy**

*Newsletter Editor*  
**Sandy McKnight**

*Webmaster*  
**Sue Jennings**

*Honorary Board Member.*  
**Marvin the Porcupine**

*Administrative Assistant*  
**Rachel Snyder**

*Assistant to Director*  
**H. David Lange**

November 13, 2010

Re: Upper Truckee River Restoration and Golf Course Reconfiguration Draft EIR/EIS

As one of the over 1500-member BEAR League in Homewood, CA, I am writing on their behalf as well as on behalf of the Board of Directors in support of Alternative 3 of the golf-course development proposed along the boundary of the Washoe Meadows State Park. You have already received letters from many organizations, including The League to Save Lake Tahoe and the Washoe Meadows Community, who are also in favor of this less-habitat-destructive Alternative for this incredibly sensitive area.

To be clear, we are strongly opposed to Alternative 2 not only for all of the arguments already presented by the above-named groups and the Sierra Club as well but also because the destruction of almost 1400 trees in this area which has been significantly impacted by the Angora Fire of 2007 is an unsustainable and unrecoverable loss to not only Washoe Meadows State Park but to the entire region as a whole. Due to the overwhelming loss of residential and wildland habitat as a result of this fire, wildlife intrinsic to this area have been compressed further into smaller and smaller existing forests and often are forced into residential areas as they migrate back and forth between their diminishing habitats. Alternative 2 provides only the most narrow 'corridor' to allow for wildlife passage. However, most wild animals in this area, including bears, martens and others have historic 'migration' routes that are oblivious of man-made corridors and will continue to follow these historic routes to forage along the river or in marshes and wetlands. The further destruction and degradation of raw land and forest as proposed under Alternative 2 will, of necessity, force wildlife increasingly into residential areas which is never a good solution.

Despite decades of teaching by the BEAR League and Lake Tahoe Wildlife Care, many residents have yet to learn proper 'etiquette' required in order for all to survive and thrive when living in wildlife-rich communities.

The BEAR League offers its voice to all other groups in support of Alternative 3 as we are strongly in favor of the restoration of the Upper Truckee River and its floodplain. Both are a vital water source not only for Lake Tahoe but for the entire ecology of this sensitive area which again, suffered immense damage from the Angora Fire and will take

AOB1-1

many decades for its own recovery. Alternative 2 would be a further insult to land already under pressure to recover from fire.

Working together with the State, we have a unique opportunity to show other communities facing similar decisions in terms of the balance between development and habitat preservation that a coalition of State, local and community leadership can work together for the common good. By choosing Alternative 3 you send a strong signal that wildlife/wildland restoration and protection has equal value and can be synergistic with modest, well-planned development.

Thank you for your time.

Sincerely,

Alexandra Van Zee, BEAR League members  
For Ann Bryant and the BEAR League Board

AOB1-1  
cont.



AOB1-1

The commenter's opposition to Alternative 2 and support for Alternative 3 is noted. The commenter discusses the Angora Fire and has concerns about common wildlife and wildlife corridors. See Master Response Section 3.3, "Biological Resources," for a discussion of wildlife and wildlife movement corridors and response to comment I54-1 for a discussion of the Angora Fire.



# CALIFORNIA TROUT

**870 Emerald Bay Rd., Ste #303, box #7  
South Lake Tahoe, Ca 96150  
Phone/fax 530-541-3495**

501 (c) 3 Tax Exempt ID: 23-7097680

State of California Department  
Of Parks and Recreation,  
Sierra District  
Attn: Cyndie Walck  
PO Box 16  
Tahoe City, Ca 96145

October 27, 2010

Re: Upper Truckee River Restoration & Golf Course Reconfiguration Project Draft  
EIR/EIS/EIS

Dear Ms. Walck:

California Trout (CalTrout) would like to thank you for allowing us the opportunity to comment on the Draft EIR/EIS/EIS for the Upper Truckee River Restoration & Golf Course Reconfiguration Project. California Trout submits this letter on behalf of our over 7000 members throughout the state of California. CalTrout recently opened an office in Lake Tahoe so that we could provide a voice for the fish on important projects such as this.

Our Northern Sierra office, located in Lake Tahoe, has only been open for a year and a half however, during this time we have taken on many projects to protect and restore the Upper Truckee River Watershed. We have identified this river as a priority because it has a stronghold of Lahontan cutthroat trout, is the largest tributary flowing into Lake Tahoe, has many on-going restoration projects, and because it is a large sediment contributor to the lake. Some of the efforts we have taken on include; reinvigorating the Upper Truckee River Stewardship Group, conducting monthly citizen monitoring, campaigning for Wild & Scenic designation evaluation through the Lake Tahoe Basin Management Planning process, joining the Upper Truckee River Watershed Advisory Group, and assisting the Forest Service and California Department of Fish & Game in protecting the existing Lahontan cutthroat trout populations that exist in the upper reaches of the watershed.

All these efforts demonstrate our passion for this foremost tributary to Lake Tahoe. Restoration of the floodplain, meanders, and Stream Environment Zone are crucial to the fishery and to Lake Tahoe's famed clarity. Thus, *CalTrout supports Alternative 2, 3, and 5* because each of these proposed alternatives plans to accomplish a holistic and effective restoration for this section of the river. CalTrout would prefer Alternative 3 and 5 which either minimizes or decommissions the golf course but, would also support Alternative 2 which performs a land trade to move 9 holes out of the floodplain. If through the environmental review process it is found to be economically infeasible to limit the golf course Alternative 2 still provides for restoration. Although we do not support expansion of golf courses, particularly near watercourses, without supporting Alternative 2 we may not be supporting the only economically feasible option for the river restoration.

AOB2-1

In regards to our recommended edits from moving between the draft environmental documents to the final please consider the following:

- Currently, the Recovery Implementation Team for Lahontan cutthroat trout (LCT) in the Tahoe Basin is beginning to evaluate waters for reintroduction. The Upper Truckee River is a prime candidate due to the presence of this threatened species in the upper watershed. Thus, we would appreciate that language such as in Table 3.5-5 be altered from the species not being expected to occupy the reach, to a consideration that they may eventually be expanded to the lower section of the Upper Truckee River. CalTrout hopes to partner with the project team in evaluating project components for the benefit of this native in-land trout.
- In addition, to an expanded consideration of LCT in project design we would like to see design elements that directly benefit native forage fish.
- Our suggestion is to not only “support,” recovery efforts for LCT but to actively engage with these efforts. CalTrout hopes we can support this by providing a meadows restoration evaluation matrix for LCT to help improve project elements.
- We appreciate the concept of greater river access for anglers and suggest adding fishing platforms to the design to limit trampling and bank destabilization impacts.
- Also, we recommend a more comprehensive monitoring plan for aquatic invasive species.
- Finally, we recommend a better expressed watershed scale condition discussion that explains how this project connects and relates to other restoration efforts along the river.

AOB2-2

AOB2-3

AOB2-4

AOB2-5

AOB2-6

AOB2-7

Very truly yours,



Jenny Francis-Hatch  
Northern Sierra Regional Director  
California Trout

- AOB2-1                    The commenter’s support for Alternatives 2, 3, and 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB2-2                    The commenter requests modifications to Table 3.5-5 in the draft EIR/EIS/EIS to consider the reintroduction of Lahontan cutthroat trout. Table 3.5-5 provides the setting or environmental baseline for determining impacts based on the regulatory criteria of the California Environmental Quality Act (CEQA), National Environmental Policy Act (NEPA), and Tahoe Regional Planning Agency (TRPA). In Section 3.5, “Biological Resources,” of the draft EIR/EIS/EIS, the current “baseline” conditions are a reflection and culmination of both historical and existing and ongoing activities that affect a specific resource; the true baseline condition is often a dynamic range of conditions. Including speculative information about potential future actions and species introductions would distort the impact analysis and inaccurately represent potential project impacts.
- AOB2-3                    The commenter suggests considering Lahontan cutthroat trout in the restoration design. The restoration design includes many features that would benefit native forage fish. The habitat improvements were not explicitly characterized in the draft EIR/EIS/EIS as designs to benefit native fish; rather, the improvements were implied in the description of the restoration design. Restoring the river would result in an increase in suitable habitat for fish forage and reproduction by restoring natural processes. This would increase the complexity of instream habitat, which would increase habitat suitability for forage fish and benthos (i.e., presence of runs, riffles, pools, and undercut banks). Restoring eroding banks would result in a decrease in sedimentation which would result in an increase of suitable reproductive habitat. Less sediment deposition is expected in riffles, so these areas would become suitable for egg laying by fish, and for prey species. With an increase in native riparian vegetation, shading of the river would increase; as a result, water temperatures would decline (particularly during low-flow periods), which would be beneficial to fish. These changes, paired with decreased flows resulting from increased meanders, are expected to increase the suitability of habitat for benthic macroinvertebrates, which many fish rely upon for forage. Restoration would result in an increase in the base flow during low-flow periods because the river would be reconnected with the groundwater table. This reconnection would further maintain lower water temperatures, benefiting fish. Lastly, restoring the river and relocating the golf course from adjacent to the riverbanks would decrease nutrient loading within the river. Such a decrease should cause water quality to improve, which would be directly and indirectly beneficial for fish.
- AOB2-4                    The commenter offers to provide the California Department of Parks and Recreation (State Parks) a “meadows restoration evaluation matrix” to support and improve project elements. The purpose and goals of the Upper Truckee River Restoration and Golf Course Reconfiguration Project are not directly related to recovery efforts for the Lahontan cutthroat trout. However, if one of the project’s restoration alternatives were to be implemented, habitat within the Upper Truckee River would be improved, boosting potential recovery efforts for Lahontan cutthroat trout in those locations.
- AOB2-5                    The commenter appreciates additional fishing access and suggests that fishing platforms be added to the design for bank protection. The project does not propose fishing

platforms at this time; however, if deemed necessary in the future, State Parks may consider platforms or other options as part of the Washoe Meadows SP recreation elements.

AOB2-6

The commenter suggests adding a more comprehensive monitoring plan for aquatic invasives. Mitigation Measure 3.5-7B, “Implement Aquatic Invasive Species Management Practices during Project Construction,” would prevent the spread of aquatic invasive species during project construction. A monitoring plan will be developed, using the “Riparian Ecosystem Restoration Effectiveness Framework” as a guide and concentrating on the geomorphic and vegetation attributes. The monitoring will include surveys of stream profiles and cross sections, measurements of channel flow and capacity, assessment of floodplain inundation, measurements of groundwater levels, vegetation surveys, small-mammal surveys, invasive species, and photo monitoring points.

AOB2-7

The commenter suggests improving the discussion of watershed-scale conditions to connect to other restoration efforts, but does not provide specific discussion points. See Section 3.16, “Cumulative Impacts,” in the draft EIR/EIS/EIS for a discussion of cumulative impacts and benefits.

## EIS/EIR, Upper Truckee River Restoration & Golf Course Reconfiguration Project

Jennifer Taylor [jtaylor@cityofslt.us]

**Sent:** Wednesday, November 10, 2010 6:14 PM

**To:** Project, Upper Truckee

**Cc:** Stan Hill [shill@cityofslt.us]

Dear Ms Walk:

The City of South Lake Tahoe (City) received notice of circulation of the subject document and closing of public comment on November 14, 2010. Five project alternatives are under consideration:

1. No Project/No Action
2. Restoration of the Upper Truckee River Ecosystem and Reconfigured 18-hole Regulation Golf Course
3. Restoration of the Upper Truckee River Ecosystem and Reduced Play Golf Course
4. River Stabilization (in place) with Existing 18-hole Regulation Golf Course
5. River and Meadow Ecosystem Restoration / Decommissioned Golf Course.

The City recognizes that the natural environment of the Lake Tahoe region is the area's greatest economic asset. Given the proximity to South Lake Tahoe city limits, the Lake Tahoe Golf Course is also key attraction for tourism and generates related revenues within our local economy.

Alternative 2 as described in the subject document proposes to provide an 18 hole regulation golf course (reconfigured) and also provide important environmental benefits. It is understood that with Alternative 2, construction would be sequenced such that no loss in play or reduction of the course would occur, rather holes would be relocated strategically to keep impact of play to a minimum. Alternative 4 would yield less environmental benefits yet still provide no change to the existing 18-hole configuration and maintain a tourism draw to the region. Alternative 1 will also maintain the existing 18-hole golf course, however offers no restoration or stabilization. The City can thus support all three of these aforementioned alternatives. However, due to the economic benefits received with the continuance of an 18-hole golf course, the City cannot support Alternative 3 or Alternative 5.

Thank you for the opportunity to comment. If there are any questions, please contact me.

Jennifer Taylor  
Assistant Engineer

City of South Lake Tahoe  
Public Works Department  
Engineering Division  
(530) 542-6036 TEL  
(530) 541-3051 FAX  
(530) 721-1270 CELL

NOTE: The engineering division office will be closed the 1st and 3rd Fridays of each month through 09/30/11

AOB3-1

Letter  
AOB3  
Response

City of South Lake Tahoe, Public Works Department, Engineering Division  
Jennifer Taylor, Assistant Engineer  
November 10, 2010

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AOB3-1

The commenter's support for Alternatives 1, 2, and 4 and opposition to Alternatives 3 and 5 are noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Comment on Upper Truckee Project EIR / EIS**

Nancy Graalman [ngraalman@defenseofplace.org]

Sent: Monday, November 15, 2010 5:07 PM

To: Project, Upper Truckee

November 15, 2010

State of California Department of Parks and Recreation  
Sierra District  
Cyndie Walck  
P.O. Box 16  
Tahoe City, CA 96145

RE: Upper Truckee River Restoration and Golf Course Reconfiguration  
Project EIR

Dear Ms. Walck:

I submit the following comments for consideration relative to the proposals and analyses of the EIR / EIS published August 25, 2010. Primarily, Defense of Place strongly opposes Alternative 2.

Defense of Place is the nation's only organization founded solely to protect parklands, open spaces and nature preserves whose legal charters are threatened by sale, development and predatory changes in use. Defense of Place advocates for the inviolability of the principle of law that lands set aside "in perpetuity" for preservation or public use should never be sacrificed for economic or political motives. Any betrayal or manipulation of the donor's or institution's intent represents a loss of trust in all contracts that bind generations to a common heritage of land stewardship.

AOB4-1

The Upper Truckee River Restoration and Golf Course Reconfiguration Project has thus come to the attention of our organization due to the predicted loss of unique land and habitat and diminished public use if the Lake Tahoe Golf Course, as recommended by Alternative 2, is expanded west of the river into a significant footprint of Washoe Meadows SP.

We believe that by choosing an Alternative - even a new strategy - that will declare California's dedication to protected lands over development, that this project could set a precedent for the Tahoe Basin, for California, and for land preservation values throughout the nation.

Protected Status of Washoe Meadows State Park  
Reference EIR: 3.2-3

State Parks acknowledges that relocation of the golf course holes would not be consistent with the purpose of Washoe Meadows State Park, so proposes revising the park unit boundaries, which would be supported by appropriate policy changes.

AOB4-2

We propose that this facile approach to reclassifying Washoe Meadows SP was begun without due public notice or process and inappropriately evades State Parks' regulatory obligations.



The State created Washoe Meadows State Park in 1984 with an "urgency" statute, " . . . in order to acquire as state lands an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadow, and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed through which the Upper Truckee River supplies approximately 40 percent of the water flowing into Lake Tahoe."

AOB4-3

Yet by 2004 State Parks had solicited a proposal from John Harbottle Design / Golf Architecture (Tacoma, Wash.) for the feasibility of expanding the Lake Tahoe Golf Course (located within the Lake Valley State Recreation Area) into Washoe Meadows. (Comparable proposals from Harbottle Design were submitted to Nanette Hansel, EDAA, in 2005 and 2006).

The earliest obtainable documents and public statements have fostered the idea that the economics of the proposal are so decisive that only a "championship caliber, regulation" course would be practical, which, according to Harbottle design would necessitate a course length of at least 6,000 yards and preferably 6,400 yards.

AOB4-4

This size will necessitate annexing a substantial portion of Washoe Meadows State Park: the exact acreage is unknown, because, despite written and in-person requests for GPS coordinates and landmark tags showing the proposed golf course layout, exact positioning remains difficult.

Early documents and ongoing statements from State Parks managers have consistently referred to the selected Washoe Meadows acreage as "less-environmentally sensitive lands," but a walking tour of the area reveals unspoiled land and habitat that continue to reflect the declaration of the 1984 charter that the 777 acres are "an environmentally sensitive parcel." . . . (A virtual walking tour of the site available at [www.washoemeadowscommunity.org](http://www.washoemeadowscommunity.org) offers a remarkable comprehension of the impact the golf course would have in Washoe Meadows.)

AOB4-5

Washoe Meadows SP has been in a near-Catch 22 situation under the State's maintenance. In the EIR Impact 3.2-3 (Alt. 2) it is stated that State Parks has "not prepared a General Plan for Washoe Meadows SP . . . Consistency with a general plan is, therefore, not an issue because a Washoe Meadows SP plan does not exist."

The areas of Washoe Meadows that California State Parks shows during public tours represent the agency's passive maintenance and even actions that have caused certain deteriorated acres to look more suitable for the expanded golf course holes.

AOB4-6

The project also proposes that boundaries of the Washoe Meadows State Park and Lake Valley State Recreation Area will be realigned so that the restored habitat areas are within the state park and the entire golf course is within the state recreation area.

The EIR fails to present adequate information on the proposed exchange, and the statements of "no significant impact" are erroneous. Adequate measures are not presented that can mitigate the impacts of the exchange.

Please do not hesitate to contact me for further comments or to answer any questions you may have.

Nancy Graalman  
Director  
Defense of Place  
a Project of Resource Renewal Institute  
187 East Blithedale Avenue  
Mill Valley, CA 94941  
415.885.4972

- AOB4-1                    The commenter’s opposition to Alternative 2 is noted. The commenter has concerns about loss of habitat resulting from additional public use of Washoe Meadows State Park (SP). See the following master responses:
- ▶ Master Response Section 3.2, “Land Use,” for a discussion of land trade;
  - ▶ Master Response Section 3.3, “Biological Resources,” for a discussion of wildlife habitat; and
  - ▶ Master Response Section 3.5, “Recreation,” for a discussion of recreation access.
- AOB4-2                    The commenter’s belief that the attempt to reclassify Washoe Meadows SP was done without proper public notice or process is noted. See response to comment AOB8-1 for a discussion of the public participation process. Washoe Meadows SP would remain a state park, and not be reclassified, under all the alternatives. If Alternative 2 were implemented, a boundary adjustment would occur wherein some land currently within the SP would become a part of the Lake Valley SRA, and other SRA land would become a part of Washoe Meadows SP.
- AOB4-3                    The commenter discusses the consistency of the project with the “urgency statute” that created Washoe Meadows SP (Section 3 in Chapter 1470, California Statutes of 1984). See Master Response Section 3.2, “Land Use.”
- AOB4-4                    The commenter states an opinion about early documents and public statements of the economic differences between the two types of courses. The comment is noted. Written and in-person requests for Global Positioning System (GPS) coordinates and landmark tags were provided by State Parks as requested. Furthermore, numerous site tours were also provided to the general public, golfers, and agency staff. As stated in the draft EIR/EIS/EIS, the layout of golf course holes is conceptual; exact positioning will be developed during the final design and permitting process. During the environmental analysis the entire study area was evaluated for potential impacts. Areas with valuable cultural, biological, and other valuable resources have been avoided and/or protected through mitigation and design planned as part of the project’s conceptual design. Avoidance and/or protection of these resources will continue through final design. It is consistent with CEQA, NEPA, and TRPA environmental processes to evaluate environmental impacts based on conceptual design, followed by the permitting process, which would be based on more detailed project design development. See Master Response Section 3.7, “Economics,” for details on the economics of a shorter course versus a championship regulation 18-hole golf course.
- AOB4-5                    The commenter states that acreage selected for the proposed golf course reconfiguration is “unspoiled land and habitat that continues to reflect the declaration of the 1984 charter.” See Master Response Section 3.2, “Land Use.” See response to comment AOB8-6 for a discussion of quarry areas and soil piles.

AOB4-6

The commenter disagrees with the less-than-significant impact conclusions of the draft EIR/EIS/EIS regarding a land exchange between Washoe Meadows SP and Lake Valley State Recreation Area (SRA). See Master Response Section 3.2, "Land Use."



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

NOV 01 2010

AOB-5

Myrnie Mayville  
Bureau of Reclamation  
2800 Cottage Way, Room E-2606  
Sacramento, CA 95825

Subject: Draft Environmental Impact Statement for Upper Truckee River Restoration and Golf Course Reconfiguration Project, El Dorado County, California [CEQ #20100345]

Dear Ms. Mayville:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (DEIS) for the above project. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The DEIS clearly demonstrates the need to restore the hydrologic functionality of the Upper Truckee River by reconnecting the floodplain, meadow, and riparian areas with surface and groundwater. Lake Tahoe water quality studies have identified the Upper Truckee River as the largest source of fine sediment from stream bank erosion (p. 3.4-18). The proposed restoration would substantially reduce the volume of fine sediment and nutrients entering Lake Tahoe, thereby supporting key water quality goals of the Tahoe Regional Planning Agency, Lahontan Regional Water Quality Control Board, and Lake Tahoe Environmental Improvement Program. EPA supports restoration of the Upper Truckee River.

Alternatives 2, 3 and 5 would reconnect the river to historical meanders and the currently isolated floodplain, reactivating the surrounding terrace as an enlarged functional floodplain. Reactivation of the floodplain and return of the river to more natural river processes would significantly reduce peak flows, increase the frequency of overbank flooding and floodplain storage, and enhance riparian and meadow ecosystems.

Alternative 5 (River Ecosystem Restoration with Decommissioned Golf Course) would be the environmentally superior alternative because it would result in the greatest reduction of land coverage; reduce soil, hydrological, and biological impacts; restore the largest area of Stream Environment Zone; and provide long-term water quality and habitat benefits (p. 4-5). Alternatives 3 and 2 would provide similar, but diminishing levels of environmental benefits.

We note that Alternative 1 (No Project/No Action) and Alternative 4 (River Stabilization with Existing 18-Hole Regulation Golf Course) do not meet the project purpose and need to reduce sediment and nutrient inputs and improve geomorphic processes, ecological functions,

and habitat values. While Alternative 4 would address stream bank and bed stabilization to reduce channel erosion, it does not directly modify channel capacity, streambed elevation, frequency of overbanking, or the area of the functional active floodplain. The existing impaired geomorphic and ecological conditions would continue.

We urge California State Parks, Tahoe Regional Planning Agency, and the Bureau of Reclamation to consider implementation of the alternative that maximizes ecosystem benefits. We recognize the potential loss of golfing activity and revenues to the local economy inherent in Alternatives 3 and 5; however, the DEIS states that there has been a decline in golfing demand (p. 3.8-15), in part due to increasing competition from other nearby golf courses (pps. 3.8-15, 3.8-31, and Appendix E: Lake Tahoe Golf Course Economic Feasibility Analysis).

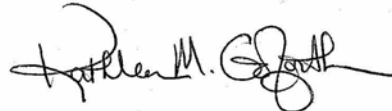
AOB5-1

Based on our review of the DEIS, we have rated the project and document as *Environmental Concerns – Insufficient Information (EC-2)*. Please see the enclosed “Summary of EPA Rating Definitions.” We would have significant concerns if Alternative 1 or 4 were selected for implementation because of their inability to meet the stated project purpose and need or to reverse existing impaired ecological conditions. The enclosed detailed comments provide recommendations for additional documentation that should be included in the FEIS regarding compliance with water quality standards, mitigation and monitoring, and Section 404 Clean Water Act compliance.

AOB5-2

EPA appreciates the opportunity to provide input regarding the proposed restoration project. When the Final EIS is released for public review, please send one hard copy to the address above (Mail Code: CED-2). If you have questions, please contact me at 415-972-3521, or contact Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or [fujii.laura@epa.gov](mailto:fujii.laura@epa.gov).

Sincerely,



Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)  
Communities and Ecosystems Division

Enclosures: Summary of EPA Rating Definitions  
Detailed Comments

Cc: Cyndie Walchk, California State Parks  
Mike Elam, Tahoe Regional Planning Agency  
Robert Larsen and Harold Singer, Lahontan RWQCB

## SUMMARY OF EPA RATING DEFINITIONS\*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

### ENVIRONMENTAL IMPACT OF THE ACTION

#### *"LO" (Lack of Objections)*

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### *"EC" (Environmental Concerns)*

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### *"EO" (Environmental Objections)*

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### *"EU" (Environmentally Unsatisfactory)*

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

### ADEQUACY OF THE IMPACT STATEMENT

#### *"Category 1" (Adequate)*

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### *"Category 2" (Insufficient Information)*

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### *"Category 3" (Inadequate)*

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

U.S. EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR UPPER TRUCKEE RIVER RESTORATION AND GOLF COURSE RECONFIGURATION PROJECT, EL DORADO COUNTY, CA., NOVEMBER 1, 2010

**Selection of the Preferred Alternative**

*Consider implementation of the alternative that maximizes ecosystem benefits.* Alternatives 2, 3 and 5 would implement the same river restoration measures, differing in their treatment of the existing Lake Tahoe Golf Course. Many of the existing golf course holes are in the active (i.e., 5-year) floodplain, historic meander belt of the river, and within the Stream Environment Zone (SEZ) (p. 2-4). Bridges serving the golf course restrict flood flows and have modified the geomorphology and hydrology of Upper Truckee River in the study area. Alternative 2 would reconfigure the existing golf course to maintain an 18-hole regulation golf course while minimizing areas within the active floodplain and SEZ. Alternative 3 would reduce the size of the existing golf course to 9-holes and Alternative 5 would decommission the golf course. These alternatives would actively modify the channel and floodplain to restore natural geomorphic and hydrologic processes, providing long-term channel and floodplain stability and a significant reduction of fine sediments and nutrient inputs to the Upper Truckee River and Lake Tahoe.

AOB5-3

Alternatives 1 and 4 would not address the long-term underlying causes of fine sediment and nutrient inputs to Lake Tahoe. Existing impaired conditions such as the disconnected floodplain, reduction and loss of historical stream meanders, restricting bridges, and golf course features adjacent to the river and within the SEZ would continue. Past efforts to address stream bank erosion, using similar techniques as proposed by Alternative 4 (riprap, root wads, bank hardening), have already partially failed, demonstrating that Alternative 4 may not provide a long-term solution to stream bank erosion and fine sediment and nutrient inputs (p. 2-85).

***Recommendation:***

We urge California State Parks, Tahoe Regional Planning Agency, and the Bureau of Reclamation to consider implementation of the alternative that maximizes ecosystem benefits.

**Meeting Water Quality Standards**

*Demonstrate consistency with Lake Tahoe TMDL and updated Tahoe Basin Regional Plan.* Lake Tahoe is listed as impaired under Section 303(d) of the Clean Water Act for nitrogen, phosphorus, and sedimentation/siltation (p. 3.4-21). A Total Maximum Daily Load (TMDL) is being developed to meet the water quality objectives for deep water clarity and transparency (p. 3.4-1). The Lahontan Regional Water Quality Control Board (Lahontan RWQCB) is scheduled to consider this TMDL for adoption on November 16, 2010. The Tahoe Regional Planning Agency (TRPA) is also updating its 1987 Regional Plan in collaboration with the US Forest Service, Lahontan RWQCB, and Nevada Division of Environmental Protection (NV DEP) through their Pathway Collaborative Process.

AOB5-4

***Recommendations:***

The FEIS should demonstrate that the selected alternative is consistent with the proposed TMDL and Pathway Collaborative actions and objectives. The proposed action should not be in conflict with the updated Tahoe Basin Regional Plan. We recommend continued

close collaboration with the Lahontan RWQCB, NV DEP, US Forest Service, and other appropriate entities to ensure water quality standards and planning goals are met.

AOB5-4  
cont.

**Mitigation and Monitoring**

***Provide detailed information on mitigation performance measures, implementation, and maintenance.*** To address potential local construction erosion effects, the action alternatives include mitigation measures requiring bed and bank stabilization measures at and immediately upstream and downstream of bridge removal sites and downstream of treated reaches (p. 3.4-47). The DEIS describes past efforts to address local erosion (riprap, root wads, bank hardening) which have not been successful and are already partially failed (p. 2-85).

AOB5-5

***Recommendation:***

The FEIS should include additional information on the ability of proposed mitigation measures to provide long-term avoidance and reduction of local erosion effects of the proposed action. We recommend including a chart describing mitigation performance standards, monitoring and reporting requirements, responsible parties, implementation schedule, and maintenance requirements for these measures.

***Include validation monitoring to verify expected outcomes of the process-based design features.*** Alternatives 2, 3, and 5 include both form-based and process-based design features where portions of the channel would be directly modified with the expectation that natural river processes would return and achieve channel equilibrium over time (pps. 2-38, 2-46). Mitigation measures and monitoring are proposed to minimize short-term effects of construction. However, it is not clear whether monitoring is included to verify the design assumption that natural processes of erosion and deposition would establish appropriate channel dimensions over time in areas where the stream is not fully reconstructed.

AOB5-6

***Recommendation:***

We recommend the proposed action include validation monitoring to verify whether the restored river channel is adapting as predicted to the actively reconfigured channel.

**Full Disclosure**

***Provide additional detail on the Section 404 permitting process.*** The DEIS states that the US Army Corps of Engineers (COE) Section 404 Regional General Permit 16 authorizes Lake Tahoe Basin activities with minimal individual and cumulative impacts, including wetland effects. The DEIS implies that this Regional General Permit would provide Section 404 Clean Water Act compliance for the proposed restoration project. The permit expired on September 30, 2010. The DEIS states an expectation that the COE would extend the expiration date of this permit and/or issue a replacement permit (p. 3.4-1).

AOB5-7

***Recommendations:***

We recommend the FEIS include additional information regarding the 404 permitting process for this project. The current status of Regional General Permit 16 should be described, stating whether the permit has been extended or reissued and the specific activities covered by the permit. We urge California State Parks, TRPA, and Bureau of



Reclamation (BOR) to work with the Sacramento Office of the COE, as soon as possible, to ensure Section 404 compliance for this project.

AOB5-7  
cont.

**Provide information to support the expectation that a return to natural river processes, versus stream bank and bed stabilization, would provide long-term reduction in fine sediment and nutrients.** Alternative 4 would stabilize the stream bank and bed to reduce fine sediment loads to the Upper Truckee River and Lake Tahoe. This alternative would not directly modify channel capacity, streambed elevation, the frequency of overbank flooding, or increase the area of functional active floodplain. The DEIS concludes that Alternative 4 would maintain the existing impaired geomorphic and hydrologic processes limiting natural geomorphic adjustments to historic disturbances (p. 3.4-66). On the other hand, the DEIS states Alternative 4 would reduce fine sediment loads from stream bank erosion by 15.8% for the entire river relative to existing conditions, as compared to a 10.8% reduction under Alternative 2, 3, or 5, which directly modify the channel to restore natural river processes (pps. 3.4-65 and 3.4-42).

AOB5-8

**Recommendations:**

The FEIS should include data to support the expectation that a return to natural geomorphic and hydrologic river processes, versus stream bank and bed stabilization, would provide a long-term reduction of fine sediments and nutrient inputs to the Upper Truckee River and Lake Tahoe. For example, include information on the state of river restoration science (level of success in obtaining restoration objectives, long-term sustainability) and a description of the costs and benefits of similar restoration efforts, such as the upstream Angora Creek restoration.

**Include irrigation system improvements as an integral part of restoration. Include information on water rights and diversion effects.** The existing golf course irrigation system is old, resulting in high water usage (960,000 gallons per day) and management inefficiencies (p. 3.3-34). Alternatives 2 and 3 would replace and modernize this system significantly, thereby reducing excess runoff and improving water conservation.

**Recommendations:**

We recommend replacement and modernization of the golf course irrigation system be an integral part of the restoration project if the selected alternative includes retention of a golf course of any size. Maximization of water conservation and water reuse technologies are likely to be of greater importance with climate change and the potential for more frequent and severe droughts. We recommend the FEIS include additional information on water rights and the effects of the surface and groundwater diversions for golf course irrigation.

AOB5-9

**Provide an estimate of the cost of restoration.** The DEIS does not appear to provide information on the cost of the restoration project by alternative. Instead, the economic feasibility evaluation focuses on whether keeping, reducing, or eliminating the golf course would be economically sustainable and provide income to California State Parks.

AOB5-10

***Recommendations:***

We recommend the FEIS provide an estimate of the cost of the restoration proposal. The FEIS should provide a comparative analysis of the alternatives based upon both the cost of the restoration and the economic feasibility/sustainability of the different golf course treatments (reconfigured, reduced-play, decommissioned).

AOB5-10  
cont.

- AOB5-1            The commenter states a preference for selecting an alternative to maximize ecosystem benefits, and refers to a statement in the economic study regarding a decline in golfing demand. Appendix E, “Lake Tahoe Golf Course Economic Feasibility Analysis,” to the draft EIR/EIS/EIS acknowledges that the Lake Tahoe Golf Course has experienced declining gross revenues since 1997. The comment is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB5-2            The commenter has rated the project through the U.S. Environmental Protection Agency’s (EPA’s) rating system as Environmental concerns—Insufficient Information (EC-2). The commenter discusses concerns about selecting Alternative 1 or Alternative 4 because of the inability of these alternatives to meet the project’s purpose and need or to reverse existing impaired conditions. This comment refers to detailed comments related to water quality standards, mitigation and monitoring, and Section 404 Clean Water Act (CWA) compliance addressed in responses AOB5-4 through AOB5-9 below.
- AOB5-3            The commenter states a preference for selecting an alternative that maximizes ecosystem benefits such as Alternatives 2, 3, and 5, and opposes Alternatives 1 and 4. The comment is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB5-4            The commenter notes that the adoption status of the total maximum daily load (TMDL) for Lake Tahoe is changing, requests updated information in the final EIR/EIS/EIS, and notes that TRPA is also updating its 1987 regional plan in the Pathway Collaborative process. The commenter requests that the final EIR/EIS/EIS demonstrate that the selected alternative is consistent with the TMDL and Pathway Collaborative actions and objectives. The commenter urges continued coordination among sponsor, regulatory, and planning agencies to ensure that water quality standards and planning goals are met. The commenter is correct that the status of the proposed Lake Tahoe TMDL has changed since the public draft EIR/EIS/EIS was issued. The updated information is presented in Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS,” and reads as follows:
- Under Section 303(d) of the CWA, water quality–limited segments are identified, and TMDLs of pollutants to a water body listed as impaired pursuant to that section are required. Lake Tahoe is listed as impaired, and the TMDL developed by California and Nevada to address pollutant loadings from all sources to achieve existing water quality objectives for deep water clarity and transparency (namely loadings of nitrogen, phosphorous, and fine sediment) has been adopted (California Water Boards 2011).
- If an action alternative is approved, State Parks has, and will continue to coordinate with the sponsor agencies and all regulatory agencies with jurisdiction over the project during the final design process. The project will comply with all water quality planning guidance, water quality standards, and regulatory requirements that are in effect at the time of final project design, permit approval, and if applicable, as modified by regulatory agencies during construction.

The draft EIR/EIS/EIS has assessed the project alternatives for consistency with the present TRPA Regional Plan (including adopted goals, policies, plan area statements [PASs], and ordinances), and with the adopted environmental thresholds. Evaluation of consistency of the project with future changes to the TRPA Regional Plan would be speculative at this point because no modified versions of the plan have been released to the public.

AOB5-5

The commenter requests a detailed mitigation performance standards, monitoring and reporting, and maintenance. A mitigation monitoring and reporting program will be developed after project approval. As suggested by the commenter, this program will identify all mitigation measures, time frame for implementation of each measure, monitoring and reporting requirements, and responsible parties. The commenter also notes the draft EIR/EIS/EIS description of failed past efforts. These efforts were spot treatments and this type of approach was eliminated from further consideration as discussed in Section 2.2.2, “Alternatives Considered but Eliminated from Detailed Evaluation.”

AOB5-6

The commenter requests that monitoring be implemented to verify whether the restored river channel dynamics under Alternatives 2, 3, or 5 create the predicted channel dimensions in the future. Monitoring and adaptive management activities required pursuant to CEQA, NEPA, and TRPA regulations are included in the draft EIR/EIS/EIS with a focus on parameters that assess the performance of any implemented alternative relative to the mitigation requirements for adverse environmental impacts, and/or to provide data that informs mitigation implementation decisions. It is beyond the scope of CEQA, NEPA, or TRPA monitoring requirements to require validation of design assumptions aside from those directly linked to identified impacts and mitigation. Some of the mitigation measures will require collection of data that may be useful in addressing the long-term condition of the river. Additionally, State Parks has made a practice of detailed topographic and hydrologic monitoring as part of their regular management activities for the study area for over a decade, as well as for pre- and postproject comparison for other restoration sites. State Parks would continue to conduct similar analyses in the project reach using the “Riparian Ecosystem Restoration Effectiveness Framework” as a guide, concentrating on the geomorphic and vegetation attributes. The monitoring will include stream profile and cross section surveys, channel flow and capacity measurements, floodplain inundation, groundwater level measurements, vegetation surveys, small mammal surveys, and photo monitoring points to evaluate project success.

AOB5-7

The commenter notes that CWA Section 404 permitting processes and options within the Lake Tahoe Basin recently changed and recommends that updated information be included in the final EIR/EIS/EIS. The commenter urges sponsor and regulatory agency coordination to ensure compliance with CWA Section 404.

The commenter is correct that some Federal and State water quality regulations have changed since the public draft EIR/EIS/EIS was issued. Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS,” reflects these changes, which are as follows:

Section 404 of the CWA requires projects to receive authorization from the Secretary of the Army, acting through the U.S. Army Corps of Engineers (USACE), to discharge dredged or fill material into waters of the United States, including wetlands, whether the discharge is temporary or permanent. Waters of the U.S. are generally defined as “...waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce,

including all waters which are subject to the ebb and flow of the tide; territorial seas and tributaries to such waters.” Section 404 is generally applicable to projects in which fill material would be placed within or below the ordinary high-water mark of a stream. USACE Regional General Permit 16, authorizing activities with minimal individual and cumulative impacts on waters of the United States, including wetlands, in the Tahoe Basin, expired September 30, 2010. USACE did not issue a replacement regional permit, so coverage via an appropriate nationwide permit (e.g., Nationwide Permit 27 for aquatic habitat restoration, establishment, and enhancement activities) or an individual permit would be required. In conjunction with USACE’s CWA Section 404 permits, CWA Section 401 requires that water quality certifications or waivers be issued by EPA, the states, or both (see below).

Before approval of detailed design used for project construction, a delineation of waters of the United States (including wetlands) that would be affected by project implementation would be conducted by a qualified biologist through the formal Section 404 wetland delineation process. The delineation would be submitted to and verified by the Sacramento District of USACE. Authorization for fill or reconstruction of jurisdictional waters of the United States, including wetlands, would be secured from the Sacramento District of USACE through the Section 404 permitting process. Section 404 permitting through either a nationwide or individual permit will likely require the following information:

- ▶ determination of the volume and types of material to be placed into waters of the United States;
- ▶ determination of the total area of waters of the United States to be directly and indirectly affected;
- ▶ wetland delineation in accordance with the 1987 Wetland Delineation Manual and the Western Mountain Regional Supplement (USACE 1987, 2008) when wetlands are proposed for impacts;
- ▶ description of habitat, including plant communities, located in the study area;
- ▶ description of any environmental impacts that are expected to occur, including methods to avoid, minimize, or mitigate adverse impacts on water quality or aquatic functions at the project site;
- ▶ other information pertinent to the wetland, stream, or water body involved;
- ▶ for projects involving the restoration of greater than 3 acres of wetlands, evidence that the U.S. Fish and Wildlife Service (USFWS) has been provided with a courtesy copy of the project notification; and
- ▶ a copy of the Section 401 water quality certification or waiver issued for the project.

State Parks will coordinate with the Sacramento District of USACE to ascertain the appropriate CWA Section 404 permit for the project, develop and submit all application materials, and comply with all permit requirements affecting final design, implementation, and/or monitoring and reporting.

AOB5-8

The commenter requests additional information to support the expectation that returning natural geomorphic and hydrologic river processes (Alternatives 2, 3, and 5) would perform better at long-term reduction of fine sediment than streambank and bed stabilization (Alternative 4). The results from technical studies for the Lake Tahoe TMDL, included in the draft EIR/EIS/EIS (pages 3.4-42 to 3.4-43), that used science-based predictions of future erosion of the Upper Truckee River's stream channel support the conclusion that all action alternatives would result in a substantial long-term reduction in sedimentation from channel erosion, as described below.

Impact 3.4-1 for all alternatives provides quantitative and relative comparisons of the project's water quality benefits, evaluating reductions in sources of pollutants generated from channel erosion and sedimentation (Tables 3.4-11 and 3.4-12). The commenter is correct in noting that the estimated magnitude of this source-reduction benefit is greater under Alternative 4 (15.8%) than under Alternatives 2, 3, and 5 (10.8%). Potential benefits from retaining fine sediment and nutrients (pollutant "trapping/treatment") on the active floodplain are described under Impact 3.4-4 for each alternative. These benefits are in addition to the estimated benefits from reduced channel erosion (pollutant "source reduction"). Restoring and expanding the active floodplain and functional overbanking under Alternatives 2, 3, and 5 would be a benefit; this benefit is quantified in terms of area increase and frequency increase, which are both substantial improvements relative to the baseline or Alternative 4. Therefore, the advantage of restoring natural river processes is that it includes the benefits of both reduced channel erosion (Impact 3.4-1) and increased floodplain retention (Impact 3.4-4).

In terms of both channel erosion and floodplain retention, all of the action alternatives represent substantial and measurable improvements over the baseline condition or in the future under Alternative 1. These improvements are documented in the draft EIR/EIS/EIS using scientifically based, quantified data suitable for ranked comparison of alternatives.

The commenter requests additional information on the long-term success of river restoration and a cost-benefit analysis of similar restoration efforts. See Master Response Section 3.7, "Economics," for a discussion of anticipated costs associated with the proposed project. Beneficial effects of the alternatives on water quality, habitat, and sediment reduction are discussed in Sections 3.4, "Geomorphology and Water Quality," 3.5, "Biological Resources, and 3.16, "Cumulative". Analysis of costs and benefits of other restoration projects is extremely variable dependant on factors such as the regulatory environment, scope, treatment intensity, stream and surrounding floodplain size, mobilization costs, access, construction schedule and contract limitations, and material availability and costs. Therefore, analysis of cost and benefits comparison to other restoration projects is too speculative and has not been included in this EIR/EIS/EIS.

AOB5-9

The commenter supports improving the irrigation system as an important element of restoration. The commenter notes the maximum potential daily water use (960,000 gallons per day) and existing inefficiencies cited in the draft EIR/EIS/EIS. Therefore, the commenter prefers Alternatives 2 and 3 in terms of water use efficiency. For clarification of the estimated total (not just maximum) water use, river diversion, and groundwater effects under all alternatives, see Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

The commenter also requests that information about water rights be included in the final EIR/EIS/EIS. State Parks will pursue modifications (if needed) to its existing water rights as part of permitting (and final design if necessary based on permitting requirements)

after the final EIR/EIS/EIS is certified, because the status of water rights and possible changes are important legal issues, but would not affect the physical environment, because Alternative 2 would not use more water than historical use that was allowed under the existing water right. Furthermore, if any change to surface water right was needed the deep groundwater well could provide water needs instead of river without creating negative impacts to the river and surrounding habitat. Water rights information is included in Section 3.3, "Hydrology and Flooding," of the draft EIR/EIS/EIS (page 3.3-34). Information about water use is presented in Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

AOB5-10

The commenter requests that the cost of restoration be stated. See Master Response Section 3.7, "Economics," for a discussion of costs and potential funding.

## Upper Truckee River Restoration Project

Casey Blann [CBlann@vailresorts.com]

**Sent:** Tuesday, October 26, 2010 1:29 PM

**To:** Project, Upper Truckee

AOB-6

To Whom It May Concern;

The only Alternative that treats the erosion issue adequately while also keeping a high-quality recreation experience is **Alternative 2**.

As a long-time resident of the South Shore (29 years), I have personally seen the negative effects of erosion along that stream area. Many of us have already completed our own personal BMP requirements for our own homes to assist the concerns over erosion control and sediment being washed into the Lake----this is an obvious 'no brainer' due to it's location as the largest tributary to the Lake.

This being said, an equally important issue relates to the quality of recreation in the South Shore. While there is a "glut" of quality Golf Courses in both the Carson Valley as well as the Truckee Area; here at the Lake there is a wide disparity from the Edgewood or Incline Courses and the City operated or lesser priced back-yard courses. Lake Tahoe Golf Course represents a quality experience and fills an important niche at a price that doesn't break the bank.

We in the Tahoe Area need quality recreational activities on a 12 month basis in order to provide the experiences people are seeking. Ours is a Tourist Economy that needs the unique and naturally beautiful experience that Lake Tahoe Golf Course has provided in the past and will continue to provide if Alternative 2 is selected. The other Alternatives will only be seen as "take-aways" or as another decline in our ability to appropriately serve our Guests needs.

Thank you for your consideration.

Casey Blann  
Vice President, Mountain Operations  
Heavenly Mountain Resort  
530-542-5193  
www.skiheavenly.com

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AOB6-1



AOB6-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

## Comment on Draft EIS for Upper Truckee River Project

Tom Fortune [TFortune@vailresorts.com]

**Sent:** Monday, October 25, 2010 5:07 PM

**To:** Project, Upper Truckee

AOB-7

---

Dear Sirs,

I am writing to express my support of **Alternative #2** for the **Upper Truckee River Restoration and Golf Course Reconfiguration Project**.

Alternative #2 preserves jobs and vital economic sustainability to our region, not to mention important dollars to our California State Parks.

We all support the vitality of our lake and surrounding environment – Alternative # 2 is a “win – win” and common sense approach to mitigating the restoration of these important assets to our community.

Please feel free to contact me with any questions or for further support.

Sincerely,

Tom Fortune  
Director of Base Operations  
Heavenly Mountain Resort  
Phone 530-542-6926  
Cell 775-450-0988

[www.skiheavenly.com](http://www.skiheavenly.com)

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AOB7-1

Letter  
AOB7  
Response

Heavenly Mountain Resort  
Tom Fortune, Director, Mountain Operations  
October 25, 2010

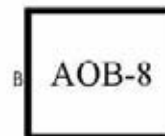
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AOB7-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

CHARITY KENYON

*kenyon | yeates* <sup>LLP</sup>



2001 N STREET, SUITE 100  
SACRAMENTO, CALIFORNIA 95811  
916.608.5000 FAX 916.608.5001

November 15, 2010

**Sent Electronically and Overnight Delivery**

Cyndie Walck  
California State Parks and Recreation  
Sierra District  
P.O. Box 16  
Tahoe City, CA 96145  
utproject@parks.ca.gov

Tahoe Regional Planning Agency  
P.O. Box 5310  
128 Market Street  
Stalene, CA 95814

U.S. Bureau of Reclamation  
Mid-Pacific Regional Library  
2800 Cottage Way  
Sacramento, CA 95825

Re: Upper Truckee River Restoration and Golf Course Reconfiguration Project (State Clearinghouse #200608215)

Dear Ms Walck:

Our firm has been asked by our client, Washoe Meadows Community, to comment on the combined EIR/EIS/EIS prepared on the above-referenced project. In addition, attached separately to our letter is the separate comment letter from the Washoe Meadows Community and Dr. Rick Hopkins of Live Oak Associates.

**I. Selection of Alternatives**

We realize that this EIR/EIS/EIS is intended to comply with the California Environmental Quality Act ("CEQA") (for California Department of Parks and Recreation, hereafter "State Parks," and any other California responsible public agencies), the National Environmental Policy Act ("NEPA") (for the U.S. Bureau of Reclamation, hereafter "BOR," and any other federal agencies), and the Tahoe Compact (for the Tahoe Regional Planning Agency, hereafter TRPA).

The Executive Summary of the EIR/EIS/EIS describes the "proposed project," as follows:

The primary purpose of the proposed project is to restore natural geomorphic and ecological processes along [a designated] reach of [Upper Truckee R]iver and to reduce the river's suspended sediment discharge to Lake Tahoe. Four alternatives

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approaches to implementing the proposed project are being considered, along with the No Project/No Action Alternative. Depending on which alternative is selected, the proposed restoration project may include continuing existing golf course use, removal of the entire Lake Tahoe Golf Course, or reconfiguration of the golf course to allow for restoration of the river, to reduce the area of Stream Environment Zone (SEZ) occupied by the golf course, and to allow for establishment of a buffer area between the golf course and the river.

(EIR/EIS/EIS, p. ES-1.) The Executive Summary goes on to explain,

Five alternatives are being considered and are analyzed at a comparable level of detail in the environmental document. A preferred or proposed alternative has not yet been defined. Following receipt and evaluation of public comments on the draft EIR/EIS/EIS, the lead agencies will determine which alternative or combinations of features from multiple alternatives will become the preferred alternative. A discussion of the decision will be included in the final EIR/EIS/EIS.

(Id. at p. ES-3.) The five alternatives are:

1. Alternative 1 No-Project/No-Action: Existing River and 18-Hole Regulation Golf Course;
2. Alternative 2 River Ecosystem Restoration with Reconfigured 18-Hole Regulation Golf Course;
3. Alternative 3 River Ecosystem Restoration with Reduced-Play Golf Course;
4. Alternative 4 River Stabilization with Existing 18-Hole Regulation Golf Course; and,
5. Alternative 5 River Ecosystem Restoration with Decommissioned Golf Course.

(Id. at pp. ES-3-6.)

Based on public testimony by representatives of State Parks at the TRPA information hearing held before the Governing Board on October 27, 2010, we do not believe the EIR/EIS/EIS has provided a reasonable range of alternatives for the public and public decision-makers to review and consider. Moreover, for purposes of compliance with CEQA, we believe the EIR has failed to identify Alternative 2 as the state lead agency's (State Parks) proposed project. At the TRPA hearing the representatives testifying on behalf of State Parks stated that Alternatives 3, 4, and 5 would not be feasible, because they either would not meet State Parks' economic objectives or would not receive BOR funding. This leaves the Alternative 1, the no project alternative, and State Park's proposed project -- Alternative 2, river restoration with an expanded golf course on the west side of the Upper Truckee River within Washoe Meadows State Park.

AOB8-1

CEQA requires an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project. (CEQA Guidelines, § 15126.6, subd. (a).) Here the state lead agency has stated that Alternatives 3 through 5 will not feasibly attain the basic objectives of the project leaving the public and

public decision makers with the limited choice of doing nothing or doing what the state lead agency wants to do in comparing the options available. This limited scope of feasible alternatives will not foster informed decisionmaking and public participation in the consideration of the project's primary purpose -- the restoration of the natural geomorphic and ecological processes along a reach of the Upper Truckee River and to reduce the river's suspended sediment discharge to Lake Tahoe.

If State Park's economic interests trump the proposed project's primary purpose then the range of alternatives presented in the EIR do not satisfy CEQA's requirements. If, however, Alternatives 3 through 5 are feasible, and are simply not the preferred choice of State Parks, the other two lead agencies and, in particular TRPA, must compare among the five alternatives, which alternative will fulfill the proposed project's "primary purpose" -- the restoration of the natural geomorphic and ecological processes along a reach of the Upper Truckee River and to reduce the river's suspended sediment discharge to Lake Tahoe.

AOB8-1  
cont.

## **II. Impact of the Alternatives on TRPA Threshold Carrying Capacities**

Pursuant to Art.V(g) of the Tahoe Compact, TRPA must determine that the project under review will not adversely affect implementation of the regional plan and will not cause the adopted environmental threshold carrying capacities of the region to be exceeded. In this situation in determining the preferred alternative TRPA is guided by "Threshold Carrying Capacities" ("thresholds"), which are standards of environmental quality to be achieved in the Tahoe Region. The standards identify the level of human impact the Lake Tahoe environment can take before irreparable damage occurs. (EIR/EIS/EIS, p. 4-6.)

### **A. Short-Term Risk of Surface Water or Groundwater Degradation Following Construction**

According to the EIR/EIS/EIS, Alternatives 2 through 5, despite mitigation, will have significant and unavoidable short-term water quality impacts due to the restoration or treatment work within the river channel and along the banks. (See Impact 3.4-7 (Alt. 2), pp. 3.4-55-57; (Alt. 3), pp. 3.4-62; (Alt. 4), pp. 3.4-68-69; (Alt. 5) pp. 3.4-73-74.) However, in comparing Alternatives 2 through 5, Alternative 4 has the least impact short term impact on water quality among the others, and would have the least impact on a TRPA threshold. As the EIR/EIS/EIS states:

Under Alternative 4, the river system would be expected to respond to an unusually large flood within the first few years after construction differently than Alternative 2, since Alternative 4 would treat the entire reach between hard grade controls (RS 1400 to RS 8800), would not enlarge or reactivate as floodplain portions of the existing terrace that have remained isolated from flow and have accumulated sediment, and would not modify the alignment or create backfilled channels that could be vulnerable to recapture. These differences reduce the potential likelihood and magnitude of effects from a large flood event relative to existing conditions.

AOB8-2

(Id. at p. 3.4-69.) Additionally, as the EIR/EIS/EIS analysis points out, Alternative 3 would have less of a short-term impact on water quality than Alternative 2:

Potential impacts from overbank and upland areas would be similar to those under Alternative 2, although the area of disturbance west of the river would be avoided and the extent of disturbance in the existing golf course (including active and 100-year floodplain) would be larger.

AOB8-2  
cont.

(Id. at p. 3.4-62.) In evaluating what alternatives will exceed TRPA water quality thresholds Alternatives 3 and 4 are superior to Alternative 2. Furthermore, if you look at the construction schedules and the length of time areas along the river will be disturbed, Alternative 2 has the lengthiest construction schedule putting the greatest risk on water quality and other thresholds during the over wintering and spring high water periods. (See EIR/EIS/EIS, pp. 2-59-61 (Alt. 2), 2-77-78 (Alt. 3), 2-91-92 (Alt. 4), 2-106-107 (Alt. 5).)

**B. Alternative 2 has significant impacts on Uncommon Plant Communities**

As pointed out by Dr. Hopkins and the Washoe Meadows Community's comments, the EIR/EIS/EIS inaccurately describes the location of the wet meadows, fens, 100-year floodplain and stream environment zone ("SEZ") that will be impacted by the relocation of nine golf holes and associated fairways, cart paths, and other ancillary facilities associated with the golf course expansion along the west side of the Upper Truckee River in Washoe Meadows State Park.

As the EIR/EIS/EIS acknowledges, the springs and fens within Washoe Meadows State Park are uncommon plant communities that under the V-2 Uncommon Plant threshold should be protected from degradation. The existence of these unique underground springs and wet meadows or fens is why TRPA sought to protect this area from development years ago and why the State of California purchased the land -- to protect these unique and sensitive wet meadows and springs. The EIR/EIS/EIS fails to accurately describe the location of these resources. Further, the design of the golf course is only conceptual, so the public and public decision makers do not have any "on-the-ground" understanding of where the golf development will be located in relation to these protected resources. (*Save Our Peninsula Committee v. Monterey Co. Bd. of Supervisors* (2001) 87 Cal.App.4th 99, "the impacts of the project must be measured against the 'real conditions on the ground.'")

AOB8-3

There has been no attempt to overlay the expanded golf course on the west side of the river on any of the exhibits that attempt to depict the 100-year floodplain, SEZ, or uncommon plant communities and springs. For example, Exhibit 2-1 at page 2-5 of the EIR/EIS/EIS depicts the study area resources including the 100-year flood plain, SEZ, and sensitive resources. In contrast, Exhibit 2-5 which depicts the "conceptual" layout of the expanded golf course on the west side of the river fails to show any topographic lines or any designation of floodplain areas.

Furthermore, the depiction of the location of the wet meadows and underground springs is simply inaccurate. For example, based on a site visit after the TRPA hearing, members of the Washoe Meadows Community were able to show me that the area where conceptual greens 8 and 12 are shown on Exhibit 2-5 and the naturalized area within the conceptual golf course

between these two conceptually laid out golf holes is a low, wet meadow area that drains toward the river. Exhibit 3.5-1, which depicts the vegetation types, misleadingly leaves the impression that this area is a lodgepole pine/dry meadow or lodgepole pine-mesic type vegetation habitat. This exhibit is simply inaccurate, because it uses such a broad brush to depict the vegetative cover over what is an obvious meadow area if the reader simply looks through the color overlay at the aerial depiction of the landscape. The conceptually laid out golf course is laid across a substantial wet meadow complex. While there may be some lodgepole pine trees at the edge of this meadow along the west side of the river, the central portion of the landscape is an open wet meadow and based on the topography of the land this wet meadow drains slowly toward the river to the east. (See *Oro Fino Gold Mining Corporation v. County of El Dorado* (1990) 225 Cal.App.3d 872, 883, "Relevant personal observations ... can constitute substantial evidence.")

Furthermore, as the conceptually laid out golf course heads southwesterly toward Chilicothe Street outside the park boundaries on Exhibit 2-5, Hole #10 and the new pond adjacent to Hole #9 appear to be within the 100 year floodplain when comparing Exhibit 2-5 to the floodplain designated on Exhibit 2-1. In addition, Holes #10 and #11 as conceptually shown on Exhibit 2-5 surround an area depicted on Exhibit 2-1 as sensitive habitat. In fact, this is an area where there is one of those deep underground springs for which the area within Washoe Meadows State Park was acquired to protect. How will the construction, irrigation, and operation of the golf course affect the uncommon fen/spring plant community?

AOB8-3  
cont.

Of all the alternatives, Alternative 2 is the only alternative that places additional man-made development on top of or immediately adjacent to the 100-year floodplain and uncommon plant communities within Washoe Meadows State Park. Yet, the EIR/EIS/EIS analysis and exhibits are confusing and misleading and, therefore, fail to provide the public and public decision makers with accurate information that would lead to an informed understanding and decision about the environmental consequences of extending the golf course to the west side of the Upper Truckee River into the Washoe Meadows State Park. The baseline conditions within Washoe Meadows State Park where the golf course will be constructed and operated must be accurately described and depicted on exhibits so that the physical changes to the existing environmental conditions can be understood by the public and their decision makers. (See *San Joaquin Raptor/Wildlife Rescue Center* (1994) 27 Cal.App.4th 713, 722, "the inadequate consideration and documentation in the EIR of existing environmental conditions rendered it impossible for the [FEIR] to accurately assess the impacts the project will have on wildlife and wildlife habitat or to determine appropriate mitigation measures for those impacts.")

### **C. Verification of Coverage is Inaccurate and Skews the Comparison of Alternatives**

The Conservation Element (Chapter IV) of TRPA's Regional Plan for the Tahoe Basin emphasizes the important role conservation of the existing soil plays in protecting Lake Tahoe.

AOB8-4

The soil resource plays an important role related to all aspects of the physical and biological environment. . . . Two environmental thresholds [impervious cover and stream environment zones] are the basis for developing strategies for protection of the soil resource . . . .



Regarding "Impervious Cover" the Regional Plan's first goal is to "minimize soil erosion and the loss of soil productivity. Goal #1 goes to state: "Protection of the Region's soil is critical in preventing excessive sediment and nutrient transport to the streams and lakes." Policy #1 under this goal acknowledges that the Regional Plan's Land Use Subelement establishes policies which limit impervious land coverage consistent with the impervious land coverage land coverage limits set forth in the "Land-Capability Classification of the Lake Tahoe Basin, California-Nevada, a Guide for Planning." Bailey 1974.

TRPA implements these land coverage goals and policies through Chapter 20 "Land Coverage Standards" in the Code of Ordinances. The EIR/EIS/EIS evaluates the alternatives' impervious land coverage in the Earth Resources section (Section 3.6) of the environmental document. At page 3.6-30 the EIR/EIS/EIS evaluates the land coverage changes associated with Alternative 2, however, this analysis is very confusing and the coverage numbers are unclear or not in compliance with Chapter 20 of the Code of Ordinances.

The EIR/EIS/EIS states that allowable coverage is based on pre-1972 existing coverage plus banked coverage or Bailey coverage whichever is greater. According to Table 3.6-8 the base coverage under Bailey allowed for Land Capability District ("LCD") 1b soils within the study area in Washoe Meadows State Park is 50,398 sf. The base coverage under Bailey allowed for LCD 1b soils at Lake Valley State Recreation Area is 83,963 square feet.

According to the EIR/EIS/EIS at page 3.6-30:

Coverage allowed is based on TRPA allowable base coverage or the pre-1972 "grandfathered" coverage (includes existing and banked pre-1972 coverage), whichever is greater. Coverage allowed within 1b in the study area (both units) is 480,521 sf. Under Alternative 2, 378,499 sf of coverage is proposed in LCD 1b, including cart paths, bridges, designated trails, parking area improvements, as well as other existing coverage that would not be modified. This is a decrease of 37,853 sf from existing coverage (416,352 sf) within LCD 1b.

This coverage calculation is wrong. Compare Tables 3.6-4 and 3.6-5 at pages 3.6-19 and 3.6-20 with Tables 3.6-8 and 3.6-9 at page 3.6-31 of the EIR/EIS/EIS. The pre-1972 "grandfathered" coverage for LCD 1b soils in Washoe Meadows State Park is 126,648 sf. (See Table 3.6-4 at page 3.6-19.) Of the 126,648 of existing pre-1972 coverage 35,983 sf has been restored. Table 3.6-4 then shows that 30,757 sf is "Banked coverage." What is confusing is that Table 3.6-4 shows that TRPA has verified existing coverage to be 130,133 sf which is higher than the allowed coverage per Bailey (50,398 sf) and the pre-1972 "grandfathered coverage" (126,648 sf). The same confusing situation is shown in Table 3.6-5 for LCD 1b at Lake Valley SRA as TRPA verified existing coverage (286,219 sf) is higher than would be allowed under Bailey (83,963 sf) and higher than existed pre-1972 (251,536 sf). It is unclear where this additional TRPA verified coverage came from, because the EIR/EIS/EIS states that "[t]he coverage in both units existed prior to acquisition by State Parks." (EIR/EIS/EIS, p. 3.6-19.)

AOB8-4  
cont.

If existing TRPA verified land coverage exceeds the existing pre-1972 land coverage then wouldn't the existing coverage that exceeds the pre-1972 coverage be considered illegal coverage?

Regarding the "banked coverage" the EIR/EIS/EIS explains where this coverage comes from, as follows:

A program has been implemented by State Parks to restore some of the disturbed areas of coverage both in Washoe Meadows SP and Lake Valley SRA and the pre-1972 coverage has been banked as mitigation.

(Id. at p. 3.6-19.) Therefore, the "banked coverage" comes from the pre-1972 "grandfathered" coverage at both Washoe Meadows State Park and Lake Valley SRA. So when the EIR/EIS/EIS concludes that the allowed coverage at both sites is 480,521 sf, this is wrong because this total "double counts" the banked coverage. Basically it re-adds the "banked" coverage to the TRPA "verified" coverage. So not only is the TRPA verified coverage an anomaly because it is greater than the pre-1972 coverage, but the EIS/EIR/EIR adds the pre-1972 banked coverage to the TRPA verified coverage total. This "double counting" of the pre-1972 coverage is not allowed under Chapter 20 of the TRPA Code of Ordinances.

Based upon the pre-1972 coverage figures shown on Tables 3.6-4 and 3.6-5 existing LCD 1b coverage within the study area at Washoe Meadows SP and Lake Valley SRA should be 378,184 sf., so there is not a beneficial decrease of existing LCD 1b coverage, since Alternative 2 will require 378,499 sf of LCD 1b coverage.

AOB8-4  
cont.

The analysis of LCD 1c soils is even more confusing. The EIR/EIS/EIS states "[c]overage allowed within LCD 1c in the study area is 315,714 sf." (Id. at p. 3.6-30.) The environmental document gets this total by adding the TRPA verified existing coverage (141,582 sf) and the "banked coverage" (174,132 sf). However, it is not at all clear where the 174,132 sf of "banked coverage" comes from. Looking at Table 3.6-4 at page 3.6-19 LCD pre-1972 coverage and TRPA verified coverage are the same (141,582 sf).<sup>1</sup> This table shows that 174,132 sf of LCD 1c soils have been restored. How can the restored pre-1972 coverage LCD 1c soils exceed the existing pre-1972 coverage?

Regarding Alternative 2's coverage of LDC 1c soils the EIR/EIS/EIS states,

55,020 sf of coverage is proposed in LCD 1c, including cart paths, small bridges, designated trails, as well as other existing coverage that would not be modified. This is a decrease of 86,562 sf from existing coverage (141,582 sf) within LCD 1c.

(Id. at p. 3.6-30.) Again this is confusing as this suggests that Alternative 2 is going to add an additional 55,020 sf of impervious (hard/soft coverage) surfaces on LCD 1c soils in addition to the existing coverage that is not being modified by this project.

<sup>1</sup> This raises again the question how the LCD 1b pre-1972 coverage and TRPA verified coverage numbers can be different in this table.

What procedure/level of detail did TRPA use to verify both soft and hard coverage for Washoe Meadows SP and Lake Valley SRA? When was this coverage verified?

Page 3.6-19 states, “[a] program has been implemented by State Parks to restore some of the disturbed areas of coverage and the pre-1972 coverage has been banked as mitigation.” It is also not clear what coverage has been restored, or is intended to be restored or what relationship this coverage has with the pre-1972 verified coverage? We are assuming that “banked coverage” has been restored.

How much Class 1b new coverage is proposed as part of Alternative 2 on the Washoe Meadows State Park? Is any new Class 1b coverage proposed at Lake Valley SRA under this alternative?

Grandfathered coverage for the sensitive Class 1b soils is over three times what would be allowed under Bailey based on lot size. (Bailey Class 1b coverage would be approx. 134,361 sf.) Would a more appropriate mitigation be the permanent retirement of excess Class 1b coverage rather than banking for future use?

There is confusion about the 174,132 sf of Class 1c coverage that is banked. Why is the pre-1972 coverage of 141,582 sf less than the banked or verified coverage?

Class 3 coverage of 109,025 sf represents “potential” Bailey coverage not “existing site coverage” already on the ground or banked or restored coverage. Will potential class 3 coverage be used for the golf course expansion? Where is this coverage located?

AOB8-4  
cont.

Would the 56,365 sf of LCD 3 coverage remain - as existing roads and trails unrelated to the golf course relocation? What future plans would there be to restore these roads and trails? How much of this coverage is associated with the golf course?

Land Capability Class 5 coverage will be new coverage in the Washoe Meadows State Park. This is land never covered previously which will require extensive site grading and tree removal. The class 5 coverage area is also shown within a “dry meadow.”<sup>2</sup> What are the impacts going to be to the dry meadow as a result of watering the golf course? Would it become a wet meadow? What criteria are used to distinguish the land capability of a dry meadow from the capability for a wet meadow?

Tables 3.6-8 and 3.6-9 are also very confusing. Is it accurate to state that under current conditions 754,228 sf of coverage exist within the two State Park units today? How was this number derived?

If coverage can be reused and banked rather than permanently retired then what is the net environmental benefit of this temporary reduction? (Id. at pg. 3.6-32.)

<sup>2</sup> During a three hour rain event in November 2010 area mapped as “dry meadow” contained standing water and was boggy.

The EIR/EIS/EIS needs to have a clear coverage chart breaking down existing coverage, compared to verified pre-1972 coverage, and separating new proposed coverage for each land capability classification. The analysis for the coverage verification should also be explained in detail. A copy of TRPA's coverage verification should be appended to the EIR/EIS/EIS.

AOB8-4  
cont.

**D. Alternative 2 Develops Expanded Golf Course on Sensitive Soils.**

*Goal #1 Policy 2. No new land coverage or other permanent disturbance shall be permitted in land capability districts 1-3 except for public outdoor recreation facilities may be permitted with findings.*

The golf course expansion at Washoe Meadows SP may be permitted on LCD 1b and 1c soils if:

- (1) The project is a necessary part of a public agency's long range plans for public outdoor recreation;
- (2) The project is consistent with the recreation element of the Regional Plan;
- (3) The project by its very nature must be sited in land capability districts 1-3;
- (4) There is no feasible alternative which avoids or reduces the extent of encroachment in land capability districts 1-3;
- (5) The impacts are fully mitigated; and
- (6) Land capability district 1-3 lands are restored in the amount of 1.5 times the area of land capability districts 1-3 which is disturbed or developed beyond that permitted by Bailey coefficients.

Please explain why the expanded golf course must be sited on LCD 1b and 1c soils? If Alternatives 3 and 4 are feasible alternatives, how does Alternative 2, which includes the development of the expanded golf course on LCD 1b and 1c soils comply with Item (4), above.

AOB8-5

Due to the inaccurate description of the baseline environmental conditions, especially the location of the wet meadows, springs, and fens, and the "conceptual" layout of the proposed golf course on the west side of the river, the EIR/EIS/EIS fails to address the question as to whether all the impacts of the golf course on those uncommon resources dependent on LCD 1b and 1c soils have been fully mitigated.

Under Alternative 2, 378,499 sf of coverage is proposed in LCD 1b. Only 134,361 sf of coverage would be allowed per Bailey. To satisfy the requirements of Policy 2B(6) the "project" must restore 366,207 sf of LCD 1b.

AOB8-6

Also, under Alternative 2, 55,020 sf of coverage is proposed in LCD 1c. Only 5,392 sf of coverage would be allowed per Bailey. To satisfy the requirements of Policy 2B(6) the "project" must restore 74,442 sf of LCD 1c.

Why isn't this restoration requirement and cost factored into the comparison of Alternatives in the EIR/EIS/EIS?

**E. Alternative 2 Develops Expanded Golf Course on Restored Park Sites.**

AOB8-8

Policy 4 under Goal #1 of the Conservation Element of the Regional Plan states: "TRPA shall develop specific policies to limit land disturbance and reduce soil and water quality impacts of disturbed areas."

Alternative 2 proposes construction of the expanded golf course on land that has been previously restored and revegetated (old quarries) in Washoe Meadows State Park. At one time fill was removed from the quarries prior to State Parks ownership. The lower West Side restoration project adjacent to the Tahoe Keys brought fill back to Washoe Meadows SP in around 2002 to restore the quarries. The expanded golf course proposes new disturbance for golf course construction partially within the area where the quarries were restored and revegetated. Some of the quarries have been restored to a near natural state.

Was the restoration of the quarry sites a Washoe Meadows State Park mitigation for the impacts of the West Side restoration project?

What has been spent to date to revegetate and restore the quarries? Were public funds used in the revegetation and restoration of the quarries?

The EIR/EIS/EIS states that disturbance exists in Washoe Meadows Park in the location of the expanded golf course however, some of the areas identified as disturbed are simply stockpiles of fill which have been created since 1972 by the State. Simply moving the fill or dirt would eliminate the disturbance.

#### **F. Alternative 2 Develops Expanded Golf Course Within Stream Environment Zone.**

The Conservation Element of the Regional Plan acknowledges the importance of Stream Environment Zones ("SEZ") which provide surface water conveyance from upland areas into Lake Tahoe.

Protection of Stream Environment Zones are essential for improving and maintaining the environmental amenities of the Lake Tahoe Basin and for achieving environmental thresholds for water quality, vegetation preservation and soil conservation.

A relevant policy involving SEZ in the Conservation Element of the Regional Plan states: "golf courses in stream environment zones shall be encouraged to retrofit course design in combination with fertilizer application standards to prevent release of nutrients to adjoining ground and surface waters."

The expanded golf course parallels the Upper Truckee River for over 1500 feet. Grading for golf fairways and greens and water features will remove native vegetation and over 1600 trees. The EIR/EIS/EIS admits that the golf course layout is only conceptual, but claims that the final design will avoid sensitive resources, springs, and drainages in order to provide an adequate buffer from the river. Yet, as discussed above, the conceptually depicted layout in the

AOB8-6  
cont.

AOB8-7

environmental documents exhibits show that some of the course will be within and immediately adjacent to the 100-year floodplain.

Please provide topographic exhibits that demonstrate how the golf course will drain and how the SEZ will be protected from the operation of the golf course and what areas will be restored as a result of the construction of the expanded golf course.

Another relevant policy involving SEZ in the Conservation Element of the Regional Plan states: "SEZ Lands shall be protected and managed for their natural values.... Because SEZ's provide many beneficial functions (especially pertaining to water quality) only forest management practices, stream improvement programs and habitat restoration projects are permissible uses."

Since the construction for the expanded golf course and portions of the expanded golf course will occur on SEZ mapped-areas (see Exhibits 2-1 and 2-5) how can Alternative 2 satisfy this policy?

AOB8-7  
cont.

#### **G. Alternative 2 Develops Expanded Golf Course Within Open Space.**

The Regional Plan has the following goal for Open Space Goal: "Manage areas of open space to promote conservation of vegetation and protection of watershed." The Regional Plan recognizes that "managing open space for its natural qualities and potential will generate numerous benefits related to such valuable resources as water, vegetation, wildlife, soil and air."

How does expanding a golf course into existing open space areas at Washoe Meadows State Park comply with the Regional Plan's goal and policies for existing open space?

AOB8-8

#### **H. Alternative 2 Develops Expanded Golf Course Within An Area Rich with Cultural Resources.**

The Regional Plan acknowledges that the Tahoe Basin's landmarks are valuable examples of its past and should be appropriately preserved. It is the Regional Plan's goal for cultural resources to "identify and preserve sites of historical, cultural and architectural significance within the region."

Indian cultural sites exist throughout Washoe Meadows State Park. The proposed golf course expansion is located within close proximity to Indian grinding rocks and other cultural resources. 14 sites were identified in the EIR/EIS. We question the adequacy of protection of these valuable resources and if more resources exist than were described in the EIR/EIS or if there are adequate buffers to insure that golfers won't impact these sites? What preservation measures will be taken to prevent vandalism of these sites? What buffers are proposed?

AOB8-9

#### **I. Alternative 2 Has Stormwater Water Quality Impacts Based on the Expansion of the Golf Course on the West Side of the River.**

The EIR/EIS/EIS acknowledges the severe water quality problems within the Tahoe Basin:

AOB8-10

Since the 1960s, Lake Tahoe has been losing its clarity at a rate of nearly 9 inches per year and has failed to meet transparency and clarity standards (Lahontan RWQCB and NDEP 2007). Lake Tahoe is included in the 2006 CWA 303(d) listing of impaired water bodies for nitrogen, phosphorus, and sedimentation/siltation. Development of the TMDL is under way to identify the pollutant sources, quantify the amount of pollutants that the lake can accept, determine options for reducing pollutants, and provide an implementation plan and monitoring plan (Lahontan RWQCB and NDEP 2007). TMDL research has established that Lake Tahoe is impaired by excess inputs of nutrients (nitrogen and phosphorus) and fine sediment. Nitrogen and phosphorus stimulate algae growth, which in turn absorbs light and reduces light penetration through the water (Reuter and Miller 2000). Fine sediments decrease clarity by scattering light as the particles slowly settle through the water (Lahontan RWQCB and NDEP 2007). Fine mineral particles (i.e., particles less than 20 microns in diameter) have been shown to strongly affect clarity and may be responsible for 60 percent or more of the transparency loss (because of their effect on light scattering). (citation omitted.)

There are several potential pathways for nutrients, fine sediment, and other pollutants to enter waters of the study area and be released downstream to the lake. Several potential sources, sinks, and transformations of these constituents may occur in the study area. Sources include streamflow (from and upstream of the study area, Angora Creek, and the unnamed creek), golf course and urban stormwater runoff (from turf, ponds, ditches, and roadways), groundwater, and direct atmospheric deposition.

(EIR/EIS/EIS, pp. 3.4-21-22.)

The Water Quality Subelement of the Regional Plan's Land Use Element states that "[t]he purity of Lake Tahoe and its tributary streams helps make the Tahoe Basin unique." Regarding the development and operation of a golf course the Water Quality Subelement has a specific policy addressing the use of fertilizers in the Tahoe Basin.

The use of fertilizer within the Tahoe Region shall be restricted to uses, areas, and practices identified in the Handbook of Best Management Practices. Lake Tahoe's primary water quality problem is an imbalance in the Lake's nutrient budget, control of artificial fertilizers (which add nutrients to the Basin) is an essential component of TRPA's water policy.

Expansion of a golf course into the undeveloped west side of the Upper Truckee River in Washoe Meadows State Park has unknown impacts regarding the leaching of sediments and fertilizers, pesticides and herbicides through drainage channels, groundwater and underground springs. The golf course expansion parallels the Upper Truckee River for approximately 1500 additional linear feet in close proximity to the river. What certainty is there that these nutrients won't travel laterally thru the groundwater and leach directly into the River?

AOB8-10  
cont.

Although the EIR/EIS/EIS claims that drainage from the golf course can be mitigated to a less than a significant effect, the impact analysis describes what is not known about the design of the golf course's drainage system and acknowledges the risks to water quality.

Alternative 2 would involve expanding the overall footprint of the golf course, including areas of upland that have not previously been developed for this type of land use. Some of this upland area was previously disturbed by a former quarry, logging, roads, and trails but it also has sensitive areas of surface and groundwater interaction. The footprint area would be increased due to larger areas of minimally managed and natural landscapes included, but the intensively managed/turf areas would be reduced compared to existing conditions. The relocated golf course areas west of the river would include new storm water features that either need to avoid and/or incorporate natural drainages to the Upper Truckee River that are presently outside of any developed storm drainage system. At the conceptual level of design, it is uncertain whether the specific storm water system features would include adequate protections to: 1) isolate upslope (unaltered) run on from storm water or irrigation drainage off of managed golf course surfaces; 2) prevent infiltration and percolation of golf course runoff that may include contaminants into shallow groundwater via natural seeps and springs and/or the planned pond; and; 3) adequately detain and pre-treat storm water that may be released or overflow to the Upper Truckee River. It is expected that the major reconfiguration of the golf course under Alternative 2 would prompt the Lahontan RWQCB to revisit the facility's waste discharge permit, likely updating monitoring locations and strengthening monitoring and reporting requirements, but the details of these requirements are not yet known.

AOB8-10  
cont.

Even if we accept the adequacy of mitigation measures to be incorporated into a yet-to-be-designed final stormwater system design, in comparing the risks to water quality among Alternative 2, 3 & 5, Alternative 2 exposes the Upper Truckee River to increased risks of sediment and nutrient transport due to the expansion of the golf course into areas of upland that have not previously been developed for this type of land use.

### III. Summary of Washoe Meadows Community comments.

Accompanying this letter (sent via email and overnight delivery) is a separate letter prepared by members of our client the Washoe Meadows Community. The Community's letter addresses the following deficiencies in the EIR/EIS/EIS.

A. Alternative 2 or State Parks' "project" fails to conform to applicable policies, regulations, and statutes, and the EIR/EIS/EIS does not analyze the environmental consequences of the project's inconsistencies with the following:

- the Litigation Settlement Agreement,
- California Statute,

AOB8-11



- the Parks Classification Decision,
- the California Public Resources Code,
- Washoe Meadows State Park Purpose Statement,
- State Parks Policies,
- the State Parks Planning Handbook, and
- Federal funding processes.

AOB8-11  
cont.

The CEQA Guidelines require lead agencies to evaluate the project's "[c]onflict with any applicable land use plan, policy, or regulation of any agency with jurisdiction over the project. Clearly State Parks has jurisdiction over this project.

B. Selection and Evaluation of Alternatives. The evaluation of Alternative Locations for the golf course is inadequate because: siting criteria development was flawed, and the application of the siting criteria was inconsistent.

AOB8-12

C. The EIR/EIS/EIS does not adequately address the substantial change in existing land use and baseline environmental conditions to accommodate the relocation of the golf course on the west side of the river, as proposed by Alternative 2.

AOB8-13

D. Alternative 2 requires a new bridge and restroom with sewer connection. This would involve modifications where shallow groundwater occurs and where tree removal would be extensive. It would impact areas mischaracterized as dry meadow, and grading would occur on slopes greater than 20% and directly above and around a sensitive wetland area (holes 9, 10, 11, and 12). The environmental consequences of this construction were not adequately evaluated in the EIR/EIS/EIS, because the baseline conditions were inaccurately described.

AOB8-14

E. The EIR/EIS/EIS minimizes Alternative 2's significant impact on scenic/aesthetic issues, rather than evaluating the true impacts of the substantial grading to modify the terrain for the golf holes, substantial removal of existing trees, and construction of golf facilities in the existing forest.

AOB8-15

F. Due to the many inaccuracies in the description of the baseline environmental conditions that will be affected by the relocated golf course holes under Alternative 2, the analysis of the impacts of Alternative 2 on the existing sensitive and protected biological resources is inadequate.

AOB8-16

G. The EIR/EIS/EIS should have evaluated an alternative that would have carried out the less intensive recreation and restoration goals for Washoe Meadows State Park while restoring the Upper Truckee River.

AOB8-17

H. The scope of the economic analysis report, the assumptions, methods, and logic are too limited and incorrect to provide an informed decision on the feasibility of the proposed alternatives.

AOB8-18

I. Additional golf course development (with a larger footprint, including a location the Upper Truckee River, wet meadows, sensitive spring complexes and fens) will increase use of pesticides and fertilizers that will adversely affect water quality. Lake Tahoe requires additional protections from potential contamination from golf course turf management practices. | AOB8-19

J. The EIR/EIS/EIS fails to adequately evaluate the environmental consequences of Alternative 2 on wildlife (mule deer as an example) and habitat. | AOB8-20

**IV. Letter of Dr. Rick Hopkins' of Live Oak Associates, Inc**

Also, accompanying our letter, is a letter prepared by Dr. Rick Hopkins of Live Oak Associates, Inc. As he points out in his letter and attached résumé, Dr. Hopkins is a professional ecological consultant. He is very familiar with the Washoe Meadows State Park and in his review of the EIR/EIS/EIS he found the following inadequacies in the document: 1) mischaracterization of the project description for some components of alternatives (i.e., particularly Alternative 2); 2) serious mapping errors in characterizing the available habitats within the study area from which all beneficial and adverse effects for each alternative was assessed; 3) fully describing the fen resources located in Washoe Meadows State Park (WMSP) and inadequately evaluating the substantial impacts of relocating a portion of the golf course to the west side of the Upper Truckee River as proposed in Alternative 2; and, 4) failing to fully assess adverse impacts to wildlife movements in Washoe Meadows State Park of the golf course development proposed in Alternative 2. | AOB8-21

On behalf of our client we appreciate the opportunity and the additional time that was provided to review the EIR/EIS/EIS. Our client favors Alternative 3 among the five alternatives evaluated or another newly defined, feasible alternative that meets the primary project objective of restoring the river while saving Washoe Meadows State Park. Since Alternative 2 is clearly State Park's proposed project, the Washoe Meadows Community believes this alternative should have been compared and evaluated against an alternative that carries out the less intensive recreational and resource protective goals that were envisioned when this property was acquired by the State of California and turned over to State Parks. Attached with this letter is the statute authorizing the acquisition of the property (Cal. Stats., ch. 1470) and the litigation settlement agreement. | AOB8-22

Sincerely,



Bill Yeates

Attachments: Cal.States, Ch. 1470 and *Lake Country Estates v TRPA* Litigation Settlement Agreement. | AOB8-23

cc: Members, Washoe Meadows Community

An act making an appropriation for land acquisition, and declaring the urgency thereof, to take effect immediately.

[Approved by Governor September 25, 1984. Filed with Secretary of State September 26, 1984.]

*The people of the State of California do enact as follows:*

SECTION 1. The sum of two hundred ninety-five thousand dollars (\$295,000) is hereby appropriated from the General Fund to the Department of Water Resources for payment of costs of land acquisition, in settlement of a judgment in eminent domain in case No. 70981 of the Superior Court in and for the County of Butte, for the Feather River Enhancement Project authorized pursuant to Chapter 1 (commencing with Section 12250) of Part 4.7 of Division 6 of the Water Code.

SEC. 2. (a) The sum of five million six hundred ninety-seven thousand dollars (\$5,697,000) is hereby appropriated from the moneys available for allocation pursuant to Section 6217 of the Public Resources Code, after the obligations provided for in subdivisions (a), (b), (c), and (d), of Section 6217 have been met and prior to any other allocations provided for in Section 6217, to be allocated as follows:

(1) Five million ten thousand dollars (\$5,010,000) to the Wildlife Conservation Board for the acquisition of the real property which is the subject of litigation entitled Lake Country Estates, Inc., et al, v. Tahoe Regional Planning Agency, et al. (United States District Court for the Eastern District of California, No. CV-F-81-127-REC) and Lake Country Estates, Inc., et al. v. California Tahoe Regional Planning Agency, et al. (United States District Court for the Eastern District of California, No. CV-F-81-132-REC).

(2) Six hundred eighty-seven thousand dollars (\$687,000) to the Department of Parks and Recreation, six hundred sixty-seven thousand dollars (\$667,000) of which shall be for restoration of that property and twenty thousand dollars (\$20,000) of which shall be for maintenance of that property.

(b) The appropriation in subdivision (a) is subject to all of the following:

(1) The property shall be acquired pursuant to the Wildlife Conservation Law of 1947 (Chapter 4 (commencing with Section 1300) of Division 2 of the Fish and Game Code) and is exempt from relocation assistance requirements, if any, pursuant to Chapter 16 (commencing with Section 7260) of Division 7 of Title 1 of the Government Code.

(2) The Wildlife Conservation Board, upon acquisition, shall transfer control and possession of the property to the Department of Parks and Recreation.

(3) The property shall be operated and maintained by the Department of Parks and Recreation in a manner which promotes its environmental and recreational values. The Department of Parks and Recreation may enter into appropriate agreements as may be necessary to carry out the provisions of this subdivision.

SEC. 3. This act is an urgency statute necessary for the immediate preservation of the public peace, health, or safety within the meaning of Article IV of the Constitution and shall go into immediate effect. The facts constituting the necessity are:

In order to acquire lands necessary for recreation along the Feather River at the earliest possible time, and to avoid excessive interest costs on judgments rendered in eminent domain proceedings, and, in order to acquire as state lands an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadow, and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed through which the Upper Truckee River supplies approximately 40 percent of the water flowing into Lake Tahoe, and to settle and dismiss, with prejudice, the litigation regarding that property, it is necessary that this act take effect immediately.

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LAKE COUNTRY ESTATES, INC.,  
et al.,  
  
Plaintiffs,  
  
vs.  
  
TAHOE REGIONAL PLANNING AGENCY,  
et al.,  
  
Defendants.

No. CV-F-81-127-REC

LAKE COUNTRY ESTATES, INC.,  
et al.,  
  
Plaintiffs,  
  
vs.  
  
CALIFORNIA TAHOE REGIONAL  
PLANNING AGENCY, et al.,  
  
Defendants.

No. CV-F-81-132-REC

LITIGATION SETTLEMENT AGREEMENT

This Litigation Settlement Agreement, entered into  
this 12<sup>th</sup> day of June, 1984, by and between LAKE COUNTRY  
ESTATES, INC., COUNTRY CLUB ESTATES, BOULDIN DEVELOPMENT  
CORPORATION, TAHOE REGIONAL PLANNING AGENCY, JOHN MEDER,  
JAY ALLEN BRAY, THOMAS STEWART, LESTER S. NAGY, CHARLES C.  
MENELEY, WALTER E. MACKENZIE, RAYMOND L. KNISLEY, NORMAN B.  
LIVERMORE, ELMO J. DeRICCO, JAMES HENRY, WILLIAM F. BRINER,

1.

1 RICHARD M. HEIKKA, and the Secretary of the Resources Agency of  
2 California, as successor to the CALIFORNIA TAHOE REGIONAL  
3 PLANNING AGENCY, parties to the above-entitled action, by and  
4 through their respective attorneys, and the STATE OF CALIFORNIA  
5 ("State"):

6 W I T N E S S E T H:

7 WHEREAS, LAKE COUNTRY ESTATES, INC., COUNTRY  
8 CLUB ESTATES and BOULDIN DEVELOPMENT CORPORATION (hereinafter  
9 referred to collectively as "plaintiffs"), TAHOE REGIONAL  
10 PLANNING AGENCY, CALIFORNIA TAHOE REGIONAL PLANNING AGENCY, and  
11 JOHN MEDER, JAY ALLEN BRAY, THOMAS STEWART, LESTER S. NAGY,  
12 CHARLES C. MENELEY, WALTER E. MACKENZIE, RAYMOND L. KNISLEY,  
13 NORMAN B. LIVERMORE, ELMO J. DERICCO, JAMES HENRY, WILLIAM F.  
14 DRINER, and RICHARD M. HEIKKA (hereinafter collectively referred  
15 to as "defendants") are parties to consolidated actions pending  
16 in the United States District Court for the Eastern District of  
17 California, entitled Lake Country Estates, Inc., et al. v.  
18 Tahoe Regional Planning Agency, et al., No. CV-F-81-127-REC and  
19 Lake Country Estates, Inc., et al. v. California Tahoe Regional  
20 Planning Agency, et al., No. CV-F-81-132-REC (the "Consolidated  
21 Litigation").

22 WHEREAS, the STATE OF CALIFORNIA (hereinafter referred  
23 to as "State") is a sovereign state of the United States  
24 of America with an ongoing interest in the protection of  
25 Lake Tahoe and the environmentally sensitive lands within the  
26 Lake Tahoe Basin,

27 ///

1 WHEREAS, Lake Tahoe and its surroundings have been  
2 acclaimed as unique and spectacular State and National resources  
3 offering a myriad of recreational opportunities,

4 WHEREAS, the property which is the subject of this  
5 litigation, (hereinafter referred to as "subject property") is  
6 situated within the Lake Tahoe Basin, approximately 5 miles from  
7 Lake Tahoe, and is the largest contiguous private landholding  
8 within the Lake Tahoe Basin with development potential,

9 WHEREAS, the unique characteristics and location of the  
10 subject property have been described by biologists, hydrologists,  
11 limnologists, plant physiologists and summarized as follows:

12 The subject property contains unique and irreplaceable  
13 resources in the Lake Tahoe Basin, and is extremely  
14 valuable to the maintenance of the water quality of Lake  
15 Tahoe itself.

16 A primary feature of the property is that the Upper  
17 Truckee River bisects the property. The Upper Truckee  
18 River is the largest watershed in the Lake Tahoe Basin  
19 and supplies approximately 40% of the water which flows  
20 into Lake Tahoe, therefore, any human disturbance (as by  
21 development) within the reaches of the stream  
22 environment zone of the Upper Truckee River could have  
23 long-lasting adverse effects on the quality of water  
24 flowing into Lake Tahoe.

25 In addition, the land itself performs an important water  
26 quality maintenance function. The property is  
27 characterized by many acres of low lying ground with a  
high water table. Property with these characteristics  
plays a significant role in water quality maintenance by  
uptaking the nutrients and trapping sediments which  
would otherwise flow into Lake Tahoe. By preventing the  
flow of nutrients and sediments into Lake Tahoe, the  
Lake's remarkable clarity is preserved -- a clarity  
which has been observed in only one other location in  
the world, resulting in the Congressional recognition of  
Lake Tahoe as a national treasure.

The Upper Truckee River, Angora Creek and the low lying  
wetlands on the property provide riparian habitat--the  
single most important habitat in the Lake Tahoe Basin.

3.

1 Eighty percent (80%) of the 300 wildlife species present  
2 in the Basin are supported by riparian habitat, and the  
3 maintenance of that habitat is vital to the maintenance  
4 of these species. The presence of the Upper Truckee  
5 River and Angora Creek on the property result in a  
6 merger of two natural wildlife movement corridors.  
7 Waterfowl such as Canada geese and mallard ducks have  
8 been observed on the property with regularity,  
9 suggesting that this land is valuable habitat for birds  
10 along the Pacific Flyway. The diversity of plant  
11 communities, the presence of small pond areas and the  
12 two creeks all create exceptional conditions for  
13 wildlife on the property.

14 The vegetation present in this unusual setting consists  
15 of an attractive mosaic of lodgepole pine, Jeffrey pine  
16 and sedge and grass meadows with an understory of white  
17 fir. The meadows which interfinger with the forest  
18 canopy create an "edge effect." This forest-meadow edge  
19 is recognized as most valuable to wildlife because it  
20 provides meadow areas for feeding and grazing by day,  
21 and forest protection by night.

22 Also peculiar to this property is the presence of the  
23 carnivorous plant, the round-leafed sundew ( Drosera  
24  rotundifolia) which is rare in the Northern Sierra. In  
25 addition, plants of the Heath family ( Ericaceae) (which  
26 generally occur at higher elevations) are found.

27 The most unusual feature of this property, however, is  
the presence of a fish habitat which has never before  
been observed in the Tahoe Basin. The western portion  
of the property is characterized by a series of wetland  
and bog plant communities recognized as unique in the  
High Sierra. These bogs and wetlands contain streams  
which flow through the forest areas and into holes of 2'  
to 3' depth. These holes are connected by subsurface  
stream flows and within these holes, resident Eastern  
Brook Trout have been observed. The trout are able to  
live year round in these deep holes because the water is  
below the freezing level and is supplied by the  
subsurface flows. Such a phenomenon is of great  
scientific interest. The Upper Truckee River is noted  
for the best trout fishing in the Lake Tahoe Basin and  
the segment of the river which bisects the property  
provides the best trout habitat along the river. It is  
a spawning area for Rainbow, Eastern Brook and Brown  
trout.

The unique subject property is scientifically valuable,  
environmentally sensitive, vital to the maintenance of  
riparian habitat and to the maintenance of water quality  
in Lake Tahoe, and is, therefore, highly suitable for

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public acquisition in order to preserve and maintain these natural resource values.

WHEREAS, the Congress of the United States has found that maintenance of the social and economic health of the Lake Tahoe region depends upon the maintenance of significant scenic, recreational, educational, scientific, natural and public health values provided in that area. The acquisition of the subject property by the State of California would preserve the region's environmental and recreational values and would help restore and insure an equilibrium between the region's natural endowment and its man-made environment, goals deemed imperative by Congress in the Lake Tahoe Basin;

WHEREAS, the plaintiffs' proposed residential development of this property would, if approved, represent a 28% increase in the number of homes in the Upper Truckee River watershed and would be contrary to the efforts of the Tahoe Regional Planning Agency to preserve Lake Tahoe's natural resources;

WHEREAS, it is acknowledged by all parties, the State and the Federal government that this property is uniquely suited for public acquisition to protect the natural resource values thereon;

WHEREAS, the parties to the Consolidated Litigation have legal and factual contentions to be litigated relative to the subject property which are summarized as follows:

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1           Background

2           In 1972 plaintiffs sought approval from the  
3           defendant Tahoe Regional Planning Agency (hereinafter  
4           referred to as "TRPA") of a Master Plan to develop  
5           approximately 2800 dwelling units and certain commercial  
6           facilities on the subject property. Plaintiffs had  
7           previously obtained approval of the proposed Master Plan  
8           from the County of El Dorado and the TRPA Advisory  
9           Planning Commission. TRPA denied plaintiffs' Master Plan  
10          application in October 1972, and at the same time  
11          rezoned the subject property from a "General Forest and  
12          Conservation Reserve" zoning designation to entirely  
13          "Conservation Reserve" zoning designation. Plaintiffs  
14          filed suit against TRPA in April 1973 on the grounds set  
15          forth below.

16          In 1975 the defendant California Tahoe Regional  
17          Planning Agency (hereinafter referred to as "CTRPA")  
18          adopted a Regional Plan and Land Use Ordinance. One  
19          provision of the CTRPA Land Use Ordinance precluded new  
20          subdivisions on the California side of the Lake Tahoe  
21          Basin until 85% of the existing 21,000 subdivided lots  
22          had been built out. In 1977, plaintiffs sued CTRPA on  
23          the grounds set forth below.

24           Plaintiffs' Contentions

25           Plaintiffs principally contend that the defendants  
26           specifically targeted the Lake County property as early  
27           as 1971 for public acquisition as a wildlife habitat,  
28           that restrictions imposed by the defendants on use and  
29           subdivision of the property have effectively prevented  
30           any economically viable use of the property, and that  
31           defendants denied plaintiffs' application for approval  
32           of their Master Plan for development and imposed those  
33           restrictions on the property for the purpose of  
34           preventing use or development of the property and  
35           depressing the value of the property pending public  
36           acquisition. Plaintiffs allege that defendants  
37           unlawfully took the property without due process in  
38           violation of the Fifth and Fourteenth Amendments, and  
39           the Federal Civil Rights Act, 42 U.S.C. Section 1983.  
40           Plaintiffs seek monetary damages totalling over \$27  
41           million dollars and an injunction enjoining defendants,  
42           and other public agencies acting in concert with them  
43           from, among other things, prohibiting development of the  
44           property.

45           Defendants' Contentions

46           Defendants principally contend that defendants'  
47           respective regional plans and ordinances, as applicable

1 to this litigation, are valid exercises of the police  
2 power, implemented through comprehensive, regional land  
3 use plans, permitting reasonable, beneficial uses of  
4 plaintiffs' property in view of all the circumstances  
5 within the Lake Tahoe region. Defendants contend,  
6 moreover, that, as a result of the respective exercises  
7 of the police power by said agencies, plaintiffs have no  
8 cause of action for the taking of property in violation  
9 of the Fifth or Fourteenth Amendments to the United  
10 States Constitution or in violation of the Civil Rights  
11 Act, 42 U.S.C. Section 1983. Defendants have maintained  
12 the foregoing contentions both generally and  
13 specifically with respect to TRPA's "Conservation  
14 Reserve" zoning of plaintiffs property and CTRPA's "85%  
15 Rule".

9 Defendants further contend that plaintiffs have no  
10 vested rights to any development; have failed to exhaust  
11 administrative remedies and to present the Court with a  
12 concrete controversy as a result of their failure to  
13 present to defendants a plan for development or use of  
14 plaintiffs' property pursuant to TRPA's and CTRPA's  
15 plans and ordinances applicable to said property; that  
16 the individual defendants are immune from suit and acted  
17 in good faith; that any discussions or documentation  
18 relating to acquisition of plaintiffs' property by  
19 defendants, or representatives thereof, were in pursuit  
20 of legitimate, comprehensive planning activities, which  
21 were compelled to at least recognize the existence of  
22 present and potential acquisition programs within the  
23 Lake Tahoe region.

#### 17 Litigation Status

18 A Motion to dismiss filed by the TRPA defendants  
19 was granted by the district court in 1975. However, on  
20 appeal, the Ninth Circuit affirmed in part and reversed  
21 in part, holding, among other things, that plaintiffs'  
22 complaint states a claim for relief under the due  
23 process clause of the Fifth Amendment and that  
24 plaintiffs have stated a claim for a violation of their  
25 civil rights under Title 42 U.S.C. section 1983. The  
26 Ninth Circuit held that TRPA was immune from liability  
27 under the Eleventh Amendment and that the individual  
28 defendants, although immune from liability to the extent  
29 they were acting as legislators, have only a qualified  
30 immunity if they were acting in an executive capacity.

25 Plaintiffs petitioned the United States Supreme Court  
26 for writ of certiorari. The United States Supreme Court  
27 reversed in part in Lake Country Estates, Inc. v. Tahoe  
Regional Planning Agency, 440 U.S. 391 (1979). The  
Supreme Court held that plaintiffs' claim arises under

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the Federal Civil Rights Act, 42 U.S.C. Section 1983, and that TRPA is not immune from suit. The Supreme Court affirmed the ruling of the Ninth Circuit with respect to the potential liability and immunity of the individual defendants. The Supreme Court remanded the case to the trial court for trial.

In October 1981, the district court consolidated the action against TRPA defendants with the action against CTRPA. CTRPA renewed a motion to dismiss and/or abstain in July 1981, which motion was denied by the district court on all grounds in February 1982.

In August 1983, the CTRPA and TRPA each moved for summary judgment. Both motions were denied by the district court in December 1983 and January 1984. After reviewing the factual records presented by all parties in connection with these motions, the court ruled that this case presents genuine issues of material fact.

The court set the consolidated actions for trial to commence June 12, 1984.

WHEREAS, it is the purpose of this Agreement to preserve the subject property for the general public and to permanently protect the unique natural resources thereon, to assist in meeting the Congressionally-mandated goals of protecting, preserving and enhancing environmental quality in the Lake Tahoe Basin, and to settle more than ten years of litigation and controversy concerning the future use of said property;

WHEREAS, compromise agreements set forth herein between parties to the Consolidated Litigation and the State have been reached which will provide for public acquisition of the subject property for public uses compatible with the property's natural resources and environmentally sensitive features; will allow the State a designated time within which to seek appropriation of funds for said acquisition, and, when consummated as set forth

///

1 herein, will terminate the pending consolidated litigation  
2 relating to the subject property,

3 NOW, THEREFORE, for and in consideration of the  
4 foregoing and the mutual covenants and agreements herein  
5 contained or provided for, the parties hereto agree as follows:

6 1. Payment Of Money By State To Plaintiffs.

7 Within the time period hereinafter set forth, and upon  
8 the terms and conditions hereinafter specified, the State of  
9 California shall pay to plaintiffs from any funds which may be  
10 appropriated by the California Legislature (hereinafter referred  
11 to as "Legislature") and approved by the Governor, the total  
12 amount of five million dollars (\$5,000,000) (hereinafter referred  
13 to as "purchase price") for the subject property. Nothing herein  
14 shall preclude the State from obtaining and applying funds from  
15 any source toward the payment of said total amount. Upon the  
16 passage of a Legislative appropriation for acquisition of the  
17 subject property and approval by the Governor, the State shall  
18 deposit the purchase price and the plaintiffs shall deposit the  
19 deeds to said property in an escrow account under the terms  
20 specified in Paragraph 7.

21 2. Plaintiffs' Conveyance Of Subject Property To State

22 Within fifteen days (15) of the Governor's approval of  
23 the Legislative appropriation for the purchase price of the  
24 subject property, plaintiffs Lake Country Estates, Inc. and  
25 Country Club Estates, as holders of record title to the subject  
26 property, shall deposit into an escrow account under the terms  
27 hereinafter set forth, fully executed grant deeds, conveying to

1 the State all title and interest to the subject property, as  
2 described in the survey to be accomplished pursuant to Paragraph  
3 4e, excepting only those exceptions to said title and interest  
4 which are set forth in the May 18, 1984, preliminary title report  
5 which have been approved by the State as set forth herein. By  
6 the same date, plaintiff Bouldin Development Corporation shall  
7 insure that the deed of trust, mentioned as Exception No. 23 on  
8 said preliminary title report, of which Bouldin Development  
9 Corporation is a partial beneficiary, shall be removed as an  
10 exception to said title; and Bouldin Development Corporation  
11 shall provide to State its corporate quit claim of all its title  
12 and interest in the subject property.

13 3. Efforts to Obtain Appropriation

14 The parties hereto agree to use their best efforts to  
15 obtain, at the earliest date possible and within the time periods  
16 hereinafter set forth, the necessary appropriation for the  
17 payment of the purchase price. This appropriation shall provide  
18 that the provisions of Fish and Game Code section 1504 and  
19 Government Code section 7260 et seq. shall not apply to this  
20 acquisition. Failure of the Legislature to appropriate said  
21 total amount or any portion thereof, or failure of the Governor  
22 to approve said appropriation, shall not constitute a breach of  
23 this Agreement nor subject the State or any party hereto to any  
24 liability whatsoever. Upon failure of the Legislature to  
25 appropriate or the Governor to approve said total amount by  
26 September 30, 1984, or such other date as may be agreed upon by  
27 the parties, this Agreement shall terminate, the Consolidated

10.

1 Litigation shall resume, and no portion of this Agreement or the  
2 negotiations relating thereto, or any effort by any party hereto  
3 or the State to consummate or obtain approval of this Agreement  
4 shall be admissible for any purpose at the trial of the  
5 Consolidated Litigation or any other litigation of any kind  
6 except a proceeding to enforce the terms of this Agreement by the  
7 parties hereto;

8 4. Timing and Substance of Implementing Actions

9 It is necessary for the parties to this Agreement to  
10 undertake certain implementing actions in advance of, and  
11 concurrently with, the conducting of the escrow in order to  
12 facilitate the successful execution of this agreement  
13 (hereinafter referred to as "implementing actions"). The  
14 timing and substance of these implementing actions are set  
15 forth below:

16 a. Plaintiffs have delivered to the State a  
17 preliminary title report of the property which is the subject of  
18 this litigation, prepared by Inter-County Title Company under  
19 order number 135,760tc and current as of May 18, 1984;

20 b. Within twenty (20) days of the date of this  
21 Agreement, plaintiffs shall deliver to State a standard MAI  
22 written appraisal of the value for the subject property as of  
23 1972 and 1984, based on the following assumptions: (i) that TRPA  
24 had in 1972 approved plaintiffs' master plan for development of  
25 the property for approximately 2,395 dwelling units and related  
26 commercial uses on the subject property; (ii) that as of 1984 the  
27 plaintiffs would be entitled to proceed with a comparable

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1 development on the subject property; and (iii) that as of April  
2 1, 1984 the existing regulations affecting the property are valid  
3 and enforceable. The above described appraisals will be prepared  
4 by William Kimmel, MAI and shall include the following:

- 5 (1) an opinion as to the highest and best use of the  
6 subject property;
- 7 (2) a statement reflecting the existence of any  
8 hazardous conditions on the property, if any, which  
9 affect his opinion of value;
- 10 (3) an opinion of value;
- 11 (4) comparable sales data to support an opinion of  
12 value.

13 In addition plaintiffs shall provide a written statement of the  
14 professional qualifications of William Kimmel;

15 c. Plaintiffs shall provide evidence that all  
16 taxes on the subject property and taxes on any commercial  
17 operations upon said property are paid in full to, up to and  
18 including June 20, 1984;

19 d. Plaintiffs shall use their best efforts to insure  
20 that by the time of any Legislative appropriation for purchase of  
21 the subject property, but in no event later than September 30,  
22 1984, they have deposited grant deeds from Lake Country Estates,  
23 Inc. and Country Club Estates, conveying to the State all title  
24 and interest to the subject property, as described in the survey  
25 to be accomplished pursuant to paragraph 4e, excepting only those  
26 exceptions to said title and interest which are set forth in the  
27 May 18, 1984 preliminary title report which have been approved by

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1 the State as set forth herein. By the same date, Bouldin  
2 Development Corporation shall have deposited its corporate  
3 quitclaim of all its title and interest in the subject property;

4 e. (1) Plaintiffs, defendant TRPA and the State  
5 shall cooperate in obtaining a survey of the subject  
6 property to satisfy the conditions of escrow set forth in  
7 Paragraph 8b. The property survey will be paid for by  
8 the State and completed no later than August 1, 1984, or such  
9 other date as may be agreed upon in writing. If said survey  
10 results in a reduction or increase of the amount of acreage of  
11 the subject property (estimated heretofore by plaintiffs as  
12 approximately 777 acres) by an amount greater than two and  
13 one-half percent (19.425 acres), then adjustments to the purchase  
14 price or modifications to the other terms of this Agreement may  
15 be appropriate. Under such circumstances, the parties to this  
16 agreement shall confer regarding possible modifications to this  
17 Agreement;

18 (2) The State acknowledges that the legal description  
19 of the property may change from what is set forth in the May 18,  
20 1984 preliminary title report and property description, attached  
21 hereto as Exhibit 1, as a result of the property boundary survey,  
22 and that such change will be recorded. The State shall consent  
23 to such change in legal description, provided acceptable  
24 modifications if any, pursuant to the procedure referred to in  
25 Paragraph 4e(1) are made and provided that the plaintiffs'  
26 interest in property so described in the survey is conveyed to  
27 the State;



1 f. Title to the subject property to be conveyed to the  
2 State shall be as set forth in Exhibit 1 hereto, as modified, if  
3 at all, by the survey to be obtained pursuant to Paragraph 4e  
4 hereto, subject to the following exceptions in Exhibit 1, which  
5 exceptions are the only exceptions acceptable to the State:

6 Nos. Four, Six, Nine, Ten, Eleven, Twelve, Thirteen,  
7 Fourteen, Sixteen, Seventeen, Nineteen, Twenty, Twenty-one,  
8 Twenty-two and Twenty-four. In addition, exception No. Fifteen  
9 is acceptable, except to the extent that it creates any rights in  
10 any third party, which rights are beyond the reasonable power of  
11 the State to remove. As to such exception (No. 15) all parties  
12 shall use due diligence to remove said exception.

13 Plaintiffs shall exercise due diligence to attempt to  
14 eliminate those exceptions to the May 18, 1984 preliminary title  
15 report objected to herein by State. If, for reasons beyond the  
16 reasonable control of plaintiff, any previously unaccepted  
17 exception remains as of October 1, 1984, the State shall have the  
18 right either to accept title subject to such exceptions, or to  
19 terminate this Agreement, unless the State and plaintiffs agree  
20 otherwise in writing on or before October 15, 1984.

21 g. The parties to this Agreement shall use best  
22 efforts to assure that by September 1, 1984 or by such other  
23 date that the California Legislature adjourns the 1984 regular  
24 session, whichever is later, that the California Legislature  
25 passes a bill for the appropriation of the purchase price  
26 for the subject property. If such Legislative appropriation  
27 is made within this time period, the Parties shall commence

1 the opening of escrow within the time specified in Paragraph 5.  
2 If the Governor, thereafter, approves the Legislative  
3 appropriation, the State shall deposit the purchase price into  
4 the escrow account as soon thereafter as possible and, in any  
5 event, no later than October 30, 1984;

6 h. Representatives of plaintiffs Country Club Estates  
7 and Lake Country Estates Inc., in acting on behalf of such  
8 entities in performing the terms of this Agreement, will exercise  
9 due diligence in the ordinary course of the administration of the  
10 Estate of William C. Vanderhoof, to submit this Agreement to the  
11 Probate Court for the primary purpose of requesting the Court to  
12 adjust the amount of the existing trustee's bond, and also to  
13 secure any approval necessary for the trustees to carry out the  
14 terms of this Agreement.

15 5. Opening of Escrow

16 An escrow under this agreement shall be opened within  
17 seven (7) days of the appropriation by both houses of the  
18 California Legislature of the purchase price for the acquisition  
19 of subject property. The escrow shall be conducted by  
20 Intercounty Title Company of Placerville or by such other title  
21 company which may be agreed upon by the parties. The escrow  
22 shall be conducted according to the terms set for in this  
23 Agreement and in accordance with Escrow Instructions provided by  
24 the parties pursuant to Paragraph 6.

25 6. Escrow Instructions.

26 The parties shall provide escrow instructions to the  
27 Escrow Holder consonant with the terms of this Agreement (subject

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1 to any additions or modifications as agreed upon in writing by  
2 the parties), including provisions as to the rights and duties of  
3 the Escrow Holder.

4 7. Deposits into Escrow.

5 a. Deposits by the State

6 The State shall deposit into escrow the following:

7 (1) Within five (5) days of the opening of escrow,  
8 the State shall deposit five copies of this Agreement fully  
9 and duly executed by the Secretary of the Resources Agency of the  
10 State of California, as successor to CTRPA, and by the Attorney  
11 General of the State of California, or his designee, for the  
12 State of California;

13 (2) As soon as possible after appropriations are  
14 approved and in any event no later than October 31, 1984, the  
15 State shall deposit its warrant in the amount of \$5,000,000.00;

16 (3) Releases on behalf of the defendants in  
17 No. CV-F-81-132 REC of each plaintiff in a form acceptable to  
18 counsel for plaintiffs;

19 (4) Such other instruments or instructions as the  
20 Escrow Holder or the plaintiffs (Lake Country Estates, Inc.,  
21 Country Club Estates and Bouldin Development Corporation)  
22 may reasonably request in order to consummate this transaction.

23 b. Deposits by Plaintiffs

24 The plaintiffs shall deposit into escrow the following:

25 (1) Within five (5) days of the opening of  
26 escrow, the plaintiffs shall deposit five (5) copies of this  
27 Agreement fully and duly executed by plaintiffs Bouldin

1 Development Corporation, Lake Country Estates, Inc. and  
2 Country Club Estates by their attorneys of record;

3 (2) Within fifteen (15) days of the Governor's  
4 approval of the Legislative appropriation for the purchase  
5 price of the subject property, the deeds to the subject  
6 property duly executed by all required signatories;

7 (3) A Request for Dismissal with prejudice of  
8 the Consolidated Litigation in its entirety as against all  
9 defendants and releases of each and every defendant in a form  
10 acceptable to counsel;

11 (4) Such other instruments or instructions as Escrow  
12 Holder or the defendants or the State may reasonably request in  
13 order to consummate this transaction.

14 c. Deposits by TRPA Defendants

15 The defendants Tahoe Regional Planning Agency and the  
16 aforementioned individual defendants shall deposit within five  
17 (5) days of the opening of escrow five (5) copies of this  
18 Agreement fully and duly executed by each defendant by his  
19 attorney of record and releases of each plaintiff in a form  
20 satisfactory to counsel.

21 d. Notarization

22 All signatures on the documents deposited into  
23 escrow which are to be recorded shall be duly acknowledged,  
24 or attested, as appropriate.

25 8. Conditions Precedent to Close of Escrow

26 The close of escrow is conditioned upon:

27 a. The approval of this Agreement by the State

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1 Director of General Services and the Wildlife Conservation  
2 Board, which the parties to this Agreement shall use due  
3 diligence to obtain as soon as possible;

4 b. The completion of the boundary survey as  
5 described in Paragraph 4e and the resolution of any property  
6 or boundary disputes arising out of that survey;

7 c. The removal of all personal property, equipment  
8 or fixtures (except in and including dwellings, golf course  
9 buildings, water distribution systems and well pump on the golf  
10 course) which are situated on the subject property;

11 d. Delivery of possession and quiet enjoyment by  
12 plaintiffs;

13 e. Plaintiffs' ability to convey to the State at the  
14 close of escrow, all title and interest to the subject property,  
15 as described in the survey pursuant to Paragraph 4e, free and  
16 clear of all liens and encumbrances, except as approved by the  
17 State pursuant to Paragraph 4f. This condition shall be fully  
18 satisfied by the issuance of a standard owner's CLTA policy of  
19 title insurance, insuring the State with a liability equal to the  
20 purchase price referred to in this Agreement, which policy shall,  
21 in addition to the standard printed exceptions, contain only  
22 those exceptions to Exhibit 1 hereto which the State has approved  
23 in Paragraph 4f of this Agreement;

24 f. The deposit of the purchase price by the State and  
25 all required documents as provided in Paragraph 7;

26 g. The proration of current real property taxes as of  
27 the close of escrow and payment by plaintiffs of their pro rata

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1 share thereof;

2 h. The plaintiffs shall make the subject property  
3 available for security fencing by a designated state agency after  
4 November 1, 1984, provided that (i) the security fencing becomes  
5 the property of plaintiffs in the event escrow does not close and  
6 (ii) that plaintiffs shall have the right to approve the specific  
7 placement of such fencing (iii) such fencing will not be placed  
8 on the golf course area;

9 i. Waiver by plaintiffs of any benefits to which they  
10 or any of them might otherwise be entitled from this transaction  
11 pursuant to Government Code section 7260 et seq.

12 9. Allocation of Costs and Expenses

13 a. The expenses and fees of the Escrow Holder including  
14 but not limited to those involved in the recordation of various  
15 documents required to be recorded pursuant to the terms of this  
16 Agreement, if any, shall be borne equally by the State and the  
17 plaintiffs.

18 b. The premiums and cost of the policy of title  
19 insurance shall be paid by the State;

20 c. All expenses and charges incurred with the discharge  
21 of delinquent taxes, or any liens, exceptions or encumbrances to  
22 be removed from title pursuant to this Agreement, shall be  
23 charged to the plaintiffs;

24 d. Preparation and recording charges for the grant  
25 deed to be delivered to the State shall be paid for by the  
26 State;

27 e. The cost of the appraisal referred to in Paragraph

19.

1 4b shall be paid by plaintiffs;

2 f. The costs of the property boundary survey shall

3 be paid for by the State;

4 g. Each party hereto shall individually bear the

5 respective fees, costs and expenses of any attorney, engineer

6 or other person retained or employed by it in connection with

7 the subject transaction, except as provided in Paragraph 14(1).

8 h. The current real property taxes shall be prorated,

9 as of the close of escrow between plaintiffs and the State.

10 10. Close of Escrow

11 When the conditions precedent in Paragraph 8 have

12 been satisfied, when all required documents have been deposited

13 with the Escrow Holder and when all other instructions pursuant

14 to this Agreement have been complied with, the Escrow Holder

15 shall set a date for the close of escrow for as early a date as

16 possible, but in no event later than November 30, 1984, unless

17 otherwise agreed to in writing by the parties. The Escrow Holder

18 shall perform the following acts on such close date in the order

19 set forth below:

20 a. The Escrow Holder shall record the deeds

21 deposited in escrow;

22 b. The Escrow Holder shall release the cash payable to

23 plaintiffs the amount of \$5,000,000.00, less any sums necessary

24 to pay any obligations to be paid by plaintiffs as defined by

25 this Agreement in paragraphs 9a and allocable portions of 9h;

26 c. The Escrow Holder shall deliver to defendants the

27 requests for dismissal, with prejudice, of those entire actions,

1 Nos. CVF-81-127-REC and CVF-81-132-REC, which are the subject of  
2 this Agreement;

3 d. The Escrow Holder shall deliver the releases to all  
4 parties called for by this Agreement to counsel for the released  
5 parties;

6 e. The Escrow Holder may record and shall deliver any  
7 additional instruments delivered through the escrow, if necessary  
8 or proper in connection with the issuance of the policy of title  
9 insurance called for or otherwise in accordance with this  
10 Agreement and Escrow Instructions.

11 11. Termination of Escrow

12 The escrow provided for hereby shall automatically  
13 terminate upon either of the following events:

14 a. If the Agreement terminates due to the failure of  
15 the conditions set forth in Paragraph 3;

16 b. If the Escrow Agent is unable to close the escrow as  
17 provided in Section 8 and 10 hereto prior to November 30, 1984,  
18 or such other date as the parties may agree.

19 12. Effect of Termination of Escrow

20 a. In the event the escrow is terminated for  
21 any reason as provided in Paragraph 11 hereof, the  
22 Escrow Holder shall forthwith return all documents to the  
23 party depositing the same; provided, however, that the  
24 Request for Dismissal shall first be marked "VOID" in large,  
25 noticeable letters on the face thereof;

26 b. If the escrow is terminated and if any party  
27 has failed to perform its respective duties hereunder, each

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1 party shall have such rights and remedies as provided by law  
2 and in equity for the failure of such other party to perform.

3 13. Duties of Escrow Holder

4 a. Prior to the close of escrow or termination  
5 thereof in accordance with the terms of this Agreement no  
6 party shall have the right to withdraw instruments or  
7 documents deposited by it with Escrow Holder;

8 b. All funds received by the Escrow Holder  
9 pursuant to the provisions of this Agreement shall be  
10 deposited with other escrow funds in a general interest  
11 bearing escrow account, or accounts, with any state or  
12 national bank doing business in the State of California, and  
13 may be transferred to any other such general escrow account  
14 or accounts. All disbursements shall be made by check of  
15 Escrow Holder. All interest on said account on or prior to close  
16 or termination of escrow shall be paid to the State; interest  
17 after the close of escrow shall be paid to the plaintiffs;

18 c. When the Escrow Holder has filed all documents  
19 for recording pursuant to the provisions of this Agreement, it  
20 shall proceed to distribute all documents remaining in its  
21 custody to the appropriate parties and deliver the policies  
22 of title insurance provided for in this Agreement to the State.  
23 Upon completion thereof, the Escrow Holder shall give notice to  
24 the parties that it has completed its duties and responsibilities  
25 arising out of this Agreement and, absent an objection from any  
26 party within said ten days thereafter, shall be discharged of  
27 any further duties and responsibilities hereunder. During said

22.

1 ten day period, any party may object to the Escrow Holder being  
2 discharged if any duties or responsibilities remain for the  
3 Escrow Holder to accomplish. Said objection shall be given in  
4 writing and in the manner for giving notices herein. The effect  
5 of such objection shall be to prevent the discharge of the Escrow  
6 Holder until said objection is withdrawn, another notice of  
7 completion has been given, and a ten day period without objection  
8 from any party has run.

9 14. Miscellaneous Provisions

10 a. This Agreement shall be effective upon the  
11 accomplishment of all of the following:

12 The execution of this Agreement by the plaintiffs, the  
13 defendants and the State. If this Agreement is not executed and  
14 approved as set forth in this paragraph by June 30, 1984, it  
15 shall become null and void and of no effect whatsoever.

16 b. The agreements of the plaintiffs, defendants and  
17 the State contained herein are, in part, a compromise and  
18 settlement of the disputes with regard to the subject property  
19 which are the subject of this litigation. In the event this  
20 Agreement does not become effective, or that the appropriation  
21 and approval by the Legislature and/or the Governor do not  
22 occur, or that the close of escrow does not occur, nothing  
23 herein shall be an admission of any party hereto with respect to  
24 said matters, and shall not be used by any party hereto in any  
25 proceeding, other than a proceeding to enforce the terms of this  
26 Agreement, whether judicial or otherwise to evidence the location,  
27 character, condition or legal status of any property or interest

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1 therein that is the subject of this Agreement, or the belief,  
2 statement, knowledge or intent of any party hereto with respect  
3 to said property or interest.

4 c. So long as authorized by applicable laws to do so,  
5 each of the parties hereto will do such further acts and  
6 execute, acknowledge and deliver all further conveyances and  
7 other instruments as may be necessary to more fully assure to  
8 each other party hereto, all of the respective properties,  
9 rights, titles, interests, estates, remedies powers, and  
10 privileges to be conveyed or provided for herein.

11 d. The parties agree that all provisions of this  
12 Agreement which remain to be performed after the close of escrow  
13 shall survive such close and shall continued in full force and  
14 effect. Upon the close of escrow, all such provisions of this  
15 Agreement shall be severable, separate and distinct from the  
16 other provisions of this Agreement. Should any party fail to  
17 comply with any or all of such provisions after the close of  
18 escrow, such failure shall in no way affect the consideration  
19 supporting this Agreement or the validity or binding nature  
20 thereof. Nothing herein, however, shall affect or diminish the  
21 rights of any party hereto at law or in equity, or both, to  
22 enforce the provisions of this Agreement against any other party  
23 hereto.

24 e. As used herein, whenever the context so requires,  
25 the neuter gender includes the masculine and the feminine, and  
26 the singular includes the plural and vice versa. Defined terms  
27 are to have their defined meaning regardless of the grammatical

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form, number or tense of such terms.

f. The table of contents contained in this Agreement and the title headings of the respective articles and sections of this Agreement are inserted for convenience only, and shall not be deemed to be part of this Agreement or considered in construing this Agreement.

g. All notices required or permitted to be given to a party hereto or to the Escrow Holder by the provisions of this Agreement shall be deemed to have been given forty-eight (48) hours after such notice is deposited in the United States mail as registered or certified mail, with postage thereon fully prepaid, addressed to such party at its address set forth under or opposite its signature to this Agreement, or when such notice is filed as a telegram with Western Union Telegraph Company, or any successor in interest of said telegraph company, addressed as above provided, with all charges thereon fully prepaid. Any notice given in any other fashion shall be deemed to have been given when actually received by the addressee. Any party hereto may change its address by giving written notice to all other parties hereto and the Escrow Holder. A copy of all notices given by a party to another party hereto also shall be given to the Escrow Holder and said notice shall not be effective until deemed given to both the party to receive it and the Escrow Holder pursuant to the provisions of this paragraph.

The addresses of the parties hereto are as follows:

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(1) Plaintiffs:

Bouldin Development Corporation  
by and through its attorneys of  
record herein:

Gary Moore,  
Jane Cosgriff Sullwold,  
McCUTCHEN, DOYLE, BROWN & ENERSEN,  
Three Embarcadero Center,  
San Francisco, California 94111.

Lake Country Estates and Country  
Club Estates by and through their  
attorneys of record herein:

John Bartko,  
Robert H. Bunzel,  
BARTKO, WELSH & TARRANT  
One Maritime Plaza, Suite 1440  
San Francisco, California 94111

(2) Defendants:

Tahoe Regional Planning Agency  
and the individual defendants John  
Meder, Jay Allen Bray, Thomas  
Stewart, Lester S. Nagy, Charles  
Meneley, Walter E. MacKenzie,  
Raymond L. Knisley, Norman B.  
Livermore, Elmo J. DeKicco,  
James Henry, William E. Briner,  
Richard M. Heikka  
by and through their attorneys of  
record herein:

Gary A. Owen,  
Louis R. Doescher  
SHAW, HEATON, DOESCHER & OWEN, Ltd.  
304 S. Minnesota  
Carson City, Nevada 89702  
P. O. Box 605  
Carson City, Nevada 89702

California Tahoe Regional  
Planning Agency by and through  
its attorney of record:

Richard M. Skinner,  
Deputy Attorney General  
Office of the Attorney General  
1515 K Street, Suite 511  
Sacramento, California 95814

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1 (3) State of California (Same as California Tahoe Planning  
2 Agency.)

3 h. Time is of the essence in this Agreement.

4 i. All amendments and supplements to this Agreement of  
5 purchase and escrow instructions must be in writing and executed  
6 by each party to this action by its attorney of record. However,  
7 such execution may be in counterparts and, when so executed,  
8 shall be deemed to constitute one document.

9 j. This Agreement may be executed in any number of  
10 counterparts, and each executed counterpart shall have the same  
11 force and effect as an original instrument and as if all of the  
12 parties to the aggregate counterparts had signed the same  
13 instrument.

14 k. The rights and obligations of the parties to this  
15 agreement may not be assigned by either party without the consent  
16 of the other party. If such consent is given, the consent shall  
17 not be deemed to relieve the assigning party of the primary  
18 liability under this agreement.

19 l. In case of litigation between plaintiffs, defendants  
20 or the State relating to this Agreement, the prevailing party  
21 shall be entitled to reasonable attorneys' fees.

22 m. Each person signing this Agreement on behalf of  
23 plaintiffs, defendants Tahoe Regional Planning Agency, California  
24 Tahoe Regional Planning Agency and the State warrants that he or  
25 she is authorized by the respective party to execute and deliver  
26 this Agreement and that this Agreement will become binding on  
27 that party.

27.

1 n. The title to the property to be conveyed hereunder  
2 shall be evidenced by, and any title conditions herein contained  
3 shall be satisfied by, issuance at closing to the State of the  
4 policy of title insurance described in Paragraph 8e hereto. The  
5 State will inspect the property within ten days to ascertain its  
6 current condition and forthwith shall provide plaintiffs with a  
7 reasonable list of personal property to be removed, the removal  
8 of which shall fully satisfy the state as to the property's  
9 condition. The property shall be substantially in the same  
10 condition at the close of escrow as of the date of said  
11 inspection.

12 o. This Agreement and all rights and obligations  
13 arising out of it shall be construed in accordance with the laws  
14 of the State of California.

15 p. This Agreement is entered into solely for the  
16 benefit of the parties hereto and shall be for the benefit of,  
17 and be binding upon, the parties hereto, their successors,  
18 transferees, and assigns. Other than the parties hereto and  
19 their successors, transferees, and assigns, no third person shall  
20 be entitled, directly or indirectly, to base any claim or have  
21 any right arising from or related to this Agreement.

22 q. This Agreement contains the entire agreement and  
23 understanding concerning the subject matter between the parties  
24 to this Agreement and supersedes and replaces all prior  
25 negotiations and proposed agreements, written and oral. Each of  
26 the parties hereto acknowledges that no other party, nor the  
27 agents, nor attorneys of any other party, has made any promise,  
representation, or warranty whatsoever, express or implied, not

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1 contained herein to induce the execution of this Agreement and  
2 acknowledges that this Agreement has not been executed in  
3 reliance upon any promise, representation, or warrant whatsoever,  
4 express or implied, not contained herein to induce the execution  
5 of this Agreement. This Agreement may only be amended in  
6 writing.

7 IN WITNESS WHEREOF, the parties hereto have executed  
8 this Agreement as of the day and year first set forth  
9 hereinabove.

10 Bouldin Development Corporation  
11 by and through its attorneys of  
12 record herein:

13 Gary Moore,  
14 Jane Cosgriff Sullwold,  
15 Antonio Rossmann  
16 McCUTCHEM, DOYLE, BROWN & ENERSEN,  
17 Three Embarcadero Center  
18 San Francisco, California 94111.

19 DATED: 6/11/84 By: [Signature]

20 Lake Country Estates and Country  
21 Club Estates by and through their  
22 attorneys of record herein:

23 John Bartko,  
24 Robert H. Bunzel,  
25 BARTKO, WELSH & TARRANT  
26 One Maritime Plaza, Suite 1440  
27 San Francisco, California 94111

28 DATED: 6/11/84 By: [Signature]

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Tahoe Regional Planning Agency  
and the individual defendants John  
Neder, Jay Allen Bray, Thomas  
Stewart, Lester S. Nagy, Charles  
Meneley, Walter E. Mackenzie,  
Raymond L. Knisley, Norman B.  
Livermore, Elno J. DeRicco,  
James Henry, William E. Briner,  
Richard M. Heikka  
by and through their attorneys of  
record herein:

Gary A. Owen,  
Louis R. Doescher  
SHAW, HEATON, DOESCHER & OWEN, Ltd.  
304 S. Minnesota  
Carson City, Nevada 89702  
P. O. Box 605  
Carson City, Nevada 89702

DATED: June 12, 1984 By: [Signature]

California Tahoe Regional  
Planning Agency by and through  
its attorneys of record:

JOHN VAN DE KAMP, Attorney General  
N. Gregory Taylor, Assistant Attorney  
General  
Richard M. Skinner, Deputy Attorney  
General  
Nancy S. Mainwright, Deputy  
Attorney General  
Office of the Attorney General  
1515 K Street, Suite 511  
Sacramento, California 95814

DATED: June 12, 1984 By: [Signature]

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State of California by and through  
the Attorney General of the State  
of California:

JOHN VAN DE KAMP, Attorney General  
N. Gregory Taylor, Assistant Attorney  
General  
Richard M. Skinner, Deputy Attorney  
General  
Nancy S. Wainwright, Deputy  
Attorney General  
Office of the Attorney General  
1515 K Street, Suite 511  
Sacramento, California 95814

DATED: June 12, 1984 By: N. Gregory Taylor

**Memorandum**

*PS*

*The Office*

*WB bk Rem*

Date : August 6, 1985

To : David B. Schaub, Supervisor  
Natural Heritage Section

From : Department of Parks and Recreation

Subject: Upper Truckee Meadows, aka  
Lake Country Estates, Project

The Department has acquired control of this 777 acre project near Meyers. A copy of the authorization is attached.

We have been asked to have a General Plan ready for the Commission in July of 1988. The preparation of the General Plan itself may be assigned to others. The classification will be done by Department staff, with the lead by this Division.

Please get this action under way. The property has an existing recreation facility (golf course) and one can infer the bill authorizes its continuance. I want us to explore a variety of alternatives such as:

Proposing the transfer of the golf course to others with restrictive controls and a separate classification for the remainder.

Adding the entire parcel to Tahoe State Recreation Area.

State Recreation Area status for the whole parcel.

Any other.

Please work with Region, District and Lee Warren.

*James M. Doyle*  
James M. Doyle, Assistant Chief  
Resource Protection Division

cc: G. Tanner  
L. McCargo  
J. Anderson  
R. Henry  
Inland Region  
Sierra District

WA  
APR 13 1987  
CC: BERRY  
NORTH SECTOR  
4/13 J  
OTM

ORGANIZATIONAL NAME/NUMBER CHANGES

I. PLEASE  ESTABLISH  CHANGE  DELETE THE FOLLOWING:

NO.	FROM NAME	NO.	TO NAME
382	Lake Country Estates	382	Lake Valley SRA
	Establish →	390	Washoe Meadows SP

EXPLANATION: The Prk. & Rec. Comm. 3/23/87 meeting classified & name 2 units and added them to the State Park System. Both units will be managed by Sierra Dist. These parks shall carry a designation of "UNIT" status.

REQUESTED BY  
Eugene Erba Signature Program Analyst Title 3/24/87 Date

APPROVED BY  
Not Required Director \_\_\_\_\_ Date \_\_\_\_\_

II. FORWARD TO PROGRAM ANALYSIS UNIT

DATE RECEIVED 3/24/87 la Program Analysis Unit  
ROUTED FOR PROCESSING 3/24/87 Date  
to Computer Services

III. PROCESSED

BUDGETS SECTION Not Required Signature \_\_\_\_\_ Date \_\_\_\_\_ Effective Date \_\_\_\_\_

ACCOUNTING SECTION Not Required Signature \_\_\_\_\_ Date \_\_\_\_\_

PERSONNEL SECTION Not Required Signature \_\_\_\_\_ Date \_\_\_\_\_

IV. RETURN COMPLETED FORM TO PROGRAM ANALYSIS UNIT

DATE RECEIVED \_\_\_\_\_ Program Analysis Unit  
COPIES SENT TO: \_\_\_\_\_ COMPUTER SERVICES UNIT  
\_\_\_\_\_ BUSINESS SERVICES UNIT  
\_\_\_\_\_ DARC

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WKJ MAY 30 1985  
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State of California

The Resources Agency of California

# Memorandum

Date : April 22, 1985

# 11

11pgs.

To : Wm. S. Briner  
Director

From : Department of Parks and Recreation - Inland Region

Subject: Lake Country Estates General Plan

Recently our Department, at the request of the Department of Finance and Legislative Analyst, omitted the General Plan for Lake Country Estates being completed out of the enabling legislation funding. The Legislative Analyst and Department of Finance stipulated that the entire \$667,000 provided in the legislation fund the restoration of the property, and could not be used for the completion of the General Plan.

Within the next two weeks we will award the concession contract for the operation of the golf course. The contract was for three years only, our plan being to complete the General Plan during this three year window. It is critical that the General Plan be completed during this time frame to allow us to go to bid for a long-term basis prior to May 1988.

We are requesting that the Lake Country Estates property be given high priority consideration to allow the completion of the General Plan prior to the summer of 1988. It was our plan to complete the General Plan on a "contract basis." We estimated the cost to be about \$120,000.

Your favorable review of this request is appreciated.

*Bill*

William J. Monaghan  
Regional Director

cc:  
TO  
MACOMBR. ✓

CONCUR:

*G. R. Tanner*  
\_\_\_\_\_  
Garth R. Tanner  
Chief Deputy Director  
for Operations

*4/24/85*  
\_\_\_\_\_  
Date

cc: Les McCargo  
Jeff Anderson

# Memorandum

Date : July 1, 1985

To : Inez Cook  
Inland Region

From : Department of Parks and Recreation  
Sierra District Headquarters

Subject: Major Capital Outlay Expenditure

The enabling legislation for Lake Country Estates appropriates \$667,000 for restoration of the property. The Public Works Board approved \$656,800 - see attached cost estimate.

We are requesting that the money is established in the following manner:

- (1) \$140,600 - Contract with C.C.C. to conduct restoration work.
- (2) \$ 81,900 - In the 700 account for equipment.
- (3) \$424,000 - In the 650 account for fencing, Rip Rap, Paving.
- (4) \$ 5,000 - In travel account for District, Regional and Sacramento staff travel.
- (5) \$ 5,000 - In the 550 account for rental of heavy equipment.
- (6) \$ 300 - In the 122 account for expendable items.

Total Planned Expenditure \$656,800.

These are our best projections at this time. We will need the flexibility to T.B.A. funds at a later date. In addition, can we purchase equipment up to the \$81,900 limit without going to the Public Works Board for approval? Right now it looks like we will expend only \$68,000 for equipment. The remaining \$13,900 could be well spent on needed equipment for The Lake Country Estates Project.

Your help is appreciated in setting up the money. The budget section should be made aware that we plan on expending this money over the next three years.

*Bob*  
Robert G. Macomber  
District Superintendent

BLAZER 11,170  
RANCOR 11,520

13,760

RGM:cf

cc: William Monaghan - with attached  
Bill Heilbronn - with attached

COST ESTIMATE  
DEPARTMENT OF PARKS AND RECREATION  
DEVELOPMENT DIVISION

Sheet 1 of 1

Park SIERRA DISTRICT PMS No. \_\_\_\_\_  
 Project LAKE COUNTRY ESTATES Date MARCH 18, 1985  
 Funding \_\_\_\_\_ By JENSEN

BOTTOM LINE INCLUDING MARKUP, CONTINGENCY AND A & E ON EROSION -  
 WATER QUALITY PORTION. GENERAL PLAN EXCLUDED.

QUAN.	UNIT	ITEM	UNIT PRICE	AMOUNT
		<u>SITE CLEARING</u>		
		CCC CREW TIME (A)		140 616
		EQUIPMENT PURCHASE (B)		81 900
		MISC. EXPENDITURES (F)		10 459
				<u>\$ 232 975</u>
		<u>FENCING (C)</u>		<u>\$ 95 000</u>
		<u>EROSION - WATER QUALITY (D)</u>		
		ITEMS #1 THRU #6		218 985
104,000	sf	ADD FOR CURBS, STRIPING, BUMPERS, ETC.	25	26 000
				<u>244 985</u>
		CONTRACTOR'S MARKUP	10%	24 500
				<u>269 485</u>
		CONTINGENCY	± 7%	18 850
		ARCH. ENGR. FEES, PERMITS, ETC	15%	40 450
				<u>\$ 328 785</u>
		<u>COMPLETION OF GENERAL PLAN (E)</u>		<u>OMIT</u>

- Preliminary Estimate  
 Final Estimate

Subtotal	
Contingencies	
A & E Services	
Total	<u>\$ 656 800</u>

DPR 630 (4/78)

LAKE COUNTRY ESTATES RESTORATION

TIME FRAME PROJECTIONS

The following is our estimate when the restoration work will be completed at the Lake Country Estates project.

Environmental clearances, weather, and legal constraints may require modification of these projections.

A. California Conservation Corp.

Restoration work includes: stump grinding, quarry reforestation, fence line clearing, garbage and debris removal, stream clearance, tree slash removal.

Ongoing project for summers of 1985, 86, 87. Estimated \$140,000.

B. Equipment

The equipment will be used on the project in coordination with the California Conservation Corp and the State Park staff. The work would be ongoing for the summers of 1985, 86, 87. Estimated \$81,900.

C. Fencing

The fencing consists of replacing about 6 miles of existing barb wire fence in very poor condition, with a new smooth wire boundary fence. The project should begin in late summer of 1985 and be completed by October 15, 1985. In addition, in high visibility areas a split rail fence would be installed. Estimated total cost \$95,000.

D. Erosion Water Quality

The parking lot paving, on-site drainage, cart path paving will be completed in one contract between July 15 and October 15, 1985. The revegetation work will be ongoing during the summers of 1985 and 1986. The riprapping along the upper Truckee River will be completed in the fall (September 15 to October 15) of 1986. \$338,985 is allocated for this work.

E. Miscellaneous Expenditures

\$10,500 is required for miscellaneous expenditures for equipment rental, travel, gas-oil-repairs, small tools, fees and expenses.



Lake Country Estates - Time Frame Projections

Expenditure Estimate Summary

A.	\$140,600	CCC
B.	\$ 81,900	Equipment
C.	\$ 95,000	Fencing
D.	\$339,000	Erosion/Water Quality
E.	\$ 10,500	Miscellaneous Expenditures
	<hr/>	
	\$667,000	TOTAL

## Memorandum

Date : March 1, 1985

To : Jeffrey Anderson, Chief  
Development Division

Attn: Diann Gee

From : Department of Parks and Recreation  
Sierra District

Subject: Lake Country Estates

Today I talked to Robin Baker concerning the Lake Country Estates property. Her main concern is the provision for \$120,000 to complete the General Plan. She felt the Legislation stipulated that the \$667,000 was to be used only for restoration and doesn't allow for funding of the General Plan.

Enclosed you will find a draft of the Bill which shows \$200,000 for restoration of the property. It is my understanding that the Directors staff notified the author of the Bill along with Greg Taylor from the Attorney Generals office, that the \$200,000 was inadequate to accomplish what is required to plan and restore the property. It was agreed to fund \$667,000 to complete a General Plan, fence the property, address water quality concerns, to complete restoration/reforestation work, secure required equipment, and the provision for funding miscellaneous small expenditures.

The enclosed expenditure plan addresses the key elements which should be funded in order for the Department of Parks and Recreation to properly assume management responsibility of the property.

Your memo requests supplemental information on the proposed Expenditure Plan. The California Conservation Corp would be used to: Help with the clean up of garbage and debris on the property, grinding tree stumps, clearing along boundary fence line, reforestation of quarry area, revegetation of the sand drag area. Why do we need to buy equipment and tools: This is the most cost effective method of securing the equipment, this is supported by the DPR 504's. The equipment is needed if we are to rehabilitate the property. Why is the boundary fencing necessary: Lake Country Estates is surrounded on all sides by residential areas. The area without proper fencing would be subject to encroachments, wood thefts, and off highway vehicle use.

A great deal of time and effort was spent in formulating the expenditure plan. The augmentation in the appropriation from \$200,000 to \$667,000 was at the request of the Department of Parks and Recreation, and the increase was authorized to fund the concerns we expressed. It is critical that the plan is completed. The recently approved concession contract for the Golf Course is for only three years. This time frame was adopted so the General Plan could be completed during this three year period.

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Jeffrey Anderson, Chief  
Development Division

Attn: Diann Gee

If we can provide any additional information, please give us a call. Your help in forwarding this information to Robin is appreciated.



Robert G. Macomber  
District Superintendent

cc: Bill Monaghan  
Garth Tanner

Section 1. There is hereby appropriated from the 1984-85 fiscal year state tideland oil reserve, to be payable prior to all obligations specified in Public Resources Code Section 6217, five million ten thousand dollars (\$5,010,000) to the Wildlife Conservation Board for the acquisition and two hundred and twenty thousand dollars (\$220,000) to the Department of Parks and Recreation for restoration and maintenance of the real property which is the subject of litigation entitled Lake Country Estates, Inc., et al, v. Tahoe Regional Planning Agency, et al. (United States District Court for the Eastern District of California, No. CV-F-81-127-REC) and Lake Country Estates, Inc., et al. v. California Tahoe Regional Planning Agency, et al. (United States District Court for the Eastern District of California, No. CV-F-81-132-REC).

Schedule:

Land Acquisition - \$5,010,000

Restoration - \$200,000

Maintenance (1st year)- \$20,000

Provisions:

1. The Department of Fish and Game, Wildlife Conservation Board, upon acquisition, shall transfer control and possession of the property to the Department of Parks and Recreation.

2. The property is to be operated and maintained by the Department of Parks, and Recreation in a manner which promotes its environmental and recreational values.

Section 2. The acquisition of this property in accordance with this act shall be carried out pursuant to the provisions of the Wildlife Conservation Law of 1947, Fish and Game Code Sections 1300 et seq.

Section 3. The acquisition of this property in accordance with this act shall be exempt from relocation assistance requirements, if any, which would otherwise exist pursuant to Government Code Sections 7160, et seq.

Section 4. This act is an urgency statute necessary for the immediate preservation of the public peace, health, or safety within the meaning of Article IV of the Constitution and shall go into immediate effect. The facts constituting the necessity are:

In order to acquire as state lands an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadow and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed through which the Upper Truckee River supplies approximately 40% of the water flowing into Lake Tahoe, and to settle and dismiss with prejudice that litigation entitled Lake Country Estates, Inc., et al. v. Tahoe Regional Planning Agency, et al. (United States District Court for the

Eastern District of California, No. CV-F-81-127-REC) and Lake Country Estates, Inc., et al v. California Tahoe Regional Planning Agency, et al. (United States District Court for the Eastern District of California, No. CV-F-81-132-REC), it is necessary that this act take effect immediately.

EXPENDITURE PLAN-LAKE COUNTRY ESTATES

\$667,000 APPROPRIATED

(A) C.C.C. Crew Time - two year expenditure on clean up

Summer '85 - 18 weeks 15 person crew -	\$ 70,308.00
Summer '86 - 18 weeks 15 person crew -	70,308.00
<b>TOTAL:</b>	<b>\$ 140,616.00</b>

(B) EQUIPMENT PURCHASE

Post Hole Auger -	\$ 1,400.00
Tractor, Backhoe - Loader	69,000.00
Stump Grinder -	11,500.00
<b>TOTAL:</b>	<b>\$ 81,900.00</b>

(C) FENCING OF PROPERTY

31,680 Feet @ \$3.00 per feet -	<b>TOTAL:</b>	<b>\$ 95,040.00</b>
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(D) EROSION-WATER QUALITY (LAHONTAN R.W.Q.C.B.REQUIREMENTS)

1. Pave existing dirt parking lot 104,000 sq. ft. @\$1.5/sq. ft.	\$ 156,000.00
2. Onsite drainage facilities	3,600.00
3. Cart path paving - wet areas 12,800 sq. ft. @ \$1.5/sq. ft.	19,200.00
4. Revegetation of existing disturbed golf course area	485.00
5. Riprapping along portions of upper Truckee River Bank 150 yds. @ \$250/cu. yd.	37,500.00
6. Revegetation, scarifying and seeding -	2,200.00
<b>TOTAL:</b>	<b>\$ 218,985.00</b>

(E) COMPLETION OF GENERAL PLAN

**TOTAL:** \$ 120,000.00

(F) MISCELLANEOUS EXPENDITURES

1. Heavy Equipment Rental	\$ 5,000.00
2. Travel	2,000.00
3. Gas-Oil-Repairs	1,000.00
4. Misc. small equipment/tools (i.e., chainsaws)	1,000.00
5. Misc. fees and expenditures	1,459.00
<b>TOTAL:</b>	<b>\$ 10,459.00</b>

**GRAND TOTAL:** \$ 667,000.00

AOB8-1

The commenter believes that a reasonable range of alternatives were not evaluated in the draft EIR/EIS/EIS because some would not be feasible due to State Parks objective to maintain adequate revenue or funding limitations. As discussed in Chapter 1, “Introduction and Statement of Purpose and Need,” and as required by NEPA and TRPA, each alternative (Alternatives 1–5) was considered at an equal level of detail. However, under CEQA, alternatives do not have to be analyzed at the same level of detail as the proposed project. Because the draft EIR/EIS/EIS is a joint document, it has been prepared using the more comprehensive, comparable-detail approach required by NEPA and TRPA. The alternatives analysis has also been used as a planning mechanism to support the development of alternatives and, ultimately, identification of the “proposed Preferred Alternative.” In this way, preparation of a CEQA document has been an evolving process in which the project description is modified in response to environmental and socioeconomic characteristics of the study area. In essence, the project description has developed largely in response to the results of the impact analysis. Such an approach can be particularly effective for projects located in or near wetlands, stream environment zone (SEZ) environments, or other sensitive resource areas.

As discussed in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, the project’s purpose and need and its goals and objectives were used to develop screening criteria, which in turn were used to select the alternatives to evaluate in the EIR/EIS/EIS. The primary purpose of the project is to restore natural geomorphic and ecological processes along this reach of the Upper Truckee River, and to reduce the river’s discharge of suspended sediment to Lake Tahoe while still providing access to recreation opportunities in Washoe Meadows SP and Lake Valley SRA.

The alternatives development process was structured so that potential alternatives were systematically identified, then compared to the screening criteria to ascertain the ability of each alternative to meet the project purpose and need and project objectives. Alternatives that passed this screening review were carried forward into the draft EIR/EIS/EIS for detailed evaluation of potential environmental impacts. These alternatives were developed by State Parks, the U.S. Bureau of Reclamation (Reclamation), TRPA, and their team of technical consultants. The agencies and consultants developed the alternatives after reviewing comments received on the notice of preparation (NOP) and notice of intent (NOI), provided at public scoping meetings, and received at an additional public workshop on recreation planning (See Appendix O for Recreation Workshop Summary Report). As a result of the public scoping comments in the fall of 2006, a fifth alternative, restoration and elimination of the golf course was added, the potential for off-site relocation of the golf course was evaluated, and the lead agencies decided not to select a preferred alternative/proposed project until the public draft document was released and public comments were received and evaluated.

As stated in Section 15084(c) of the State CEQA Guidelines, the lead agency must consider all information and comments received. As indicated in the State CEQA Guidelines, the lead agency has discretion as to whether to include the information or comments in the draft EIR in whole or in part. Consistent with the State CEQA Guidelines, State Parks considered all scoping comments.



A range of reasonable alternatives was presented for public review during circulation of the draft EIR/EIS/EIS. The identification of alternatives is to be governed by the rule of reason. Infeasible alternatives need not be discussed in detail. Section 15126.6(c) of the State CEQA Guidelines provides the following guidance in selecting a range of reasonable alternatives for the project:

The range of potential alternatives for the project shall include those that could feasibly accomplish most of the basic objectives of the project, and could avoid or substantially lessen one or more of the significant effects. The EIR should also identify any alternatives that were considered by the lead agency, but were rejected during the planning or scoping process and briefly explain the reasons underlying the lead agency's determination.

Alternatives for river treatment were considered during conceptual planning and preliminary assessment of the project, before preparation of the draft EIR/EIS/EIS began (SH+G 2004a, 2004b). Also, alternative locations for the golf course have been evaluated in response to public comments. In both cases, early in the planning process, some of the alternatives considered were assessed and found to be infeasible in meeting most of the basic project objectives or in reducing a significant impact of the other alternatives; therefore, they were eliminated from detailed evaluation. The process fulfills requirements for developing alternatives for analysis in this draft EIR/EIS/EIS.

During the planning process, additional studies (e.g., the 2008 economic report) were completed in response to public requests. Data from these reports have assisted State Parks, TRPA, and Reclamation in determining a proposed Preferred Alternative. Data presented in the 2008 economic report (HEC 2008) and in the environmental analysis of the draft EIR/EIS/EIS concluded that Alternative 3 would likely not meet State Parks' objective to maintain adequate revenue and Alternative 4 would not meet State Parks' geomorphic restoration objective. It has not yet been determined if State Parks will receive construction funding for any of the action alternatives; however, State Parks believes it will be easier to obtain funding for a geomorphic restoration approach that meets more of the stated goals than it would be to obtain funding for a stabilization which would meet fewer of these goals. As discussed in Chapter 2, "Project Alternatives" of the draft EIR/EIS/EIS, because Alternative 4 could meet some of the goals, including some water quality and recreation goals, this alternative was considered feasible for evaluation in the EIR/EIS/EIS.

- AOB8-2                    The commenter's support for Alternative 4 and opposition to Alternatives 2, 3, and 5 because of differences in short-term water quality impacts is noted. The commenter's relative preference of Alternatives 3 and 4 over Alternative 2 in terms of TRPA thresholds and short-term water quality impacts is noted. For clarification, TRPA thresholds are related to long-term impacts and benefits (thresholds are evaluated on a 5-year basis). See Chapter 4, "Other Required Sections," of the draft EIR/EIS/EIS for a discussion of the effects on thresholds.
- AOB8-3                    The commenter believes that the impact analysis related to fens, wetlands, SEZ, and uncommon plant communities is inadequate and inaccurate. See Master Response Section 3.3, "Biological Resources," and Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality." Also refer to Chapter 5, "Corrections and Revisions to the Draft EIR/EIS/EIS for text revisions related to potential impacts on biological resources.

The commenter states that the coverage verification is inaccurate and inconsistent with TRPA goals and policies relating to land coverage. The draft EIR/EIS/EIS describes the methods and assumptions for the coverage analysis on pages 3.6-22 and 3.6-23 and presents information about Chapter 20 of the TRPA Code of Ordinances on page 3.6-9. As described on page 3.6-9, Section 20.4 prohibits installing new land coverage in or otherwise permanently disturbing areas assigned to Land Capability District (LCD) 1, 2, or 3. Exceptions to these prohibitions exist for single-family dwellings that are subject to review under the individual parcel evaluation system, qualifying public outdoor recreation facilities, and other qualifying public facilities. (Some examples of other qualifying public facilities are water quality control facilities, including erosion control projects; and habitat restoration, wetland rehabilitation, and SEZ restoration projects.)

Section 20.5 of the TRPA Code of Ordinances discusses the excess land coverage mitigation program. This program applies when the amount of land coverage that exists in the project area before project implementation exceeds the base land coverage for the project area. Section 20.5.C states that existing land coverage may be relocated from one portion of a SEZ to another portion if relocation would result in a net environmental benefit to the SEZ. Net environmental benefit to a SEZ is defined in Section 20.5.C as an improvement in the functioning of the SEZ and includes but is not limited to the following:

- (a) relocation of coverage from a less disturbed area to a more disturbed area or to an area further away from the stream channel;
- (b) retirement of land coverage in the affected SEZ in the amount of 1.5:1 of the amount of land coverage being relocated within a SEZ; or
- (c) for projects involving the relocation of more than 1,000 square feet (sq. ft.) of land coverage within a SEZ, a finding, based on a report prepared by a qualified professional, that the relocation will improve the functioning of the SEZ and will not negatively affect the quality of existing habitats.

Under the latter criterion, land coverage relocation in the affected SEZ can be at a 1:1 ratio (Gustafson, pers. comm., 2010). As discussed in Impact 3.6-3 (Alt. 2), the project would relocate land coverage at a 1:1 ratio. Relocating the coverage farther from the river, which would allow for a geomorphic restoration of the SEZ currently occupied by the golf course, would improve the function of the SEZ and would not negatively affect existing SEZ habitat. Banking of excess coverage is allowed by the TRPA Code of Ordinances and mitigation presented in this analysis is consistent with TRPA regulations.

The commenter states that the coverage calculations used in the evaluation of alternatives are incorrect and confusing. Based on minor project modifications, changes to coverage numbers are provided in Chapter 5, "Corrections and Revisions to the Draft EIR/EIS/EIS." The new numbers and all calculations were reviewed for this final EIR/EIS/EIS, and no inaccuracies are expected. However, coverage numbers have been estimated and may be modified based on final design. Such a modification would not affect the finding of a less-than-significant impact because, as shown in the analysis, excess (banked) coverage is available. Coverage changes will be filed with TRPA upon completion of the project.

The coverage calculations are difficult to present because of their complexity. Some information that could have been useful for a complete review of the coverage

calculations was not readily visible in the analysis presented in the draft EIR/EIS/EIS. Examples include the total verified coverage within the study area, and the difference between total allowable coverage and proposed coverage (the excess coverage available after project implementation). These new categories have been added to Tables 3.6-4 through 3.6-15 and should clear up confusion about potential coverage impacts.

The comments about specific inaccuracies in coverage calculations appear to have been based on an erroneous interpretation of the data provided. The revised Tables 3.6-4 through 3.6-15 provide a clear picture and accurate disclosure of the coverage changes that would take place under all possible alternatives.

The commenter also requests that TRPA's documentation of coverage verification be provided as an appendix. No appendix will be added to this final EIR/EIS/EIS; however, TRPA's verification is in the public domain and can be requested from TRPA directly.

AOB8-5

The commenter states that Alternative 2 would develop the golf course on sensitive soils, then quotes Goal 1, Policy 2 of the TRPA Code of Ordinances: "No new land coverage or other permanent disturbance shall be permitted in land capability districts 1–3 except for public outdoor recreation facilities....."

A golf course is a public outdoor recreation facility. Furthermore, the relocated golf course under Alternative 2 would include 356,715 sq. ft. and 60,999 sq. ft. of coverage in LCD 1b and LCD 1c, respectively. This represents a decrease in coverage from existing conditions of 59,637 sq. ft. in LCD 1b and 80,583 sq. ft. in LCD 1c. Alternative 2 would involve removing and relocating coverage associated primarily with golf course land uses and some trails within LCDs 1b and 1c to allow restoration of the floodplain, SEZ, the Upper Truckee River, and lower Angora Creek. As described in response to comment AOB8-4, above, Section 20.5.C of the TRPA Code of Ordinances states that existing land coverage may be relocated from one portion of a SEZ to another portion if relocation would result in a net environmental benefit to the SEZ. The environmental baseline is discussed in Master Response Section 3.3, "Biological Resources." As discussed in response to comment AOB8-4, specific comments on coverage calculations appear to be based on an incorrect interpretation of the data provided; updated and complete coverage calculations are included in Chapter 5 of this final EIR/EIS/EIS.

AOB8-6

The commenter questions golf course relocation on restored quarry sites, asks whether it was intended as mitigation for another project, and requests funding.

As described in Section 3.6, "Earth Resources," of the draft EIR/EIS/EIS, the middle quarry was restored with fill material from the Lower Westside Project, not as mitigation but instead to decrease transportation and disposal costs for that project, which was funded by the California Tahoe Conservancy. Costs are unknown because the Lower Westside Project was another agency's project. However, obtaining this clean fill material also provides a cost savings to the proposed golf course relocation because clean fill would be needed to complete this project.

Furthermore, restoration of the middle quarry has served to protect park users from potential safety concerns related to having an open quarry pit. The quarry pit to the south has not been restored and currently contains previously dumped material including concrete, bricks, and other debris deposited there before State Parks assumed ownership. The quarry to the north will be located only partially within the proposed relocated golf course; the western portion which has formed a wetland-type environment because of groundwater seepage from the cut-slope wall will remain as can be seen today. The soil

stockpile in the north quarry was obtained by State Parks for roads and trails operations from construction of sediment retention basins after the Angora fire and various best management practice (BMP) projects in the Tahoe Basin. This material is used for ongoing management of trails and roads within Washoe Meadows SP. The commenter incorrectly states that “simply removing the fill or dirt would eliminate the disturbance.”

AOB8-7

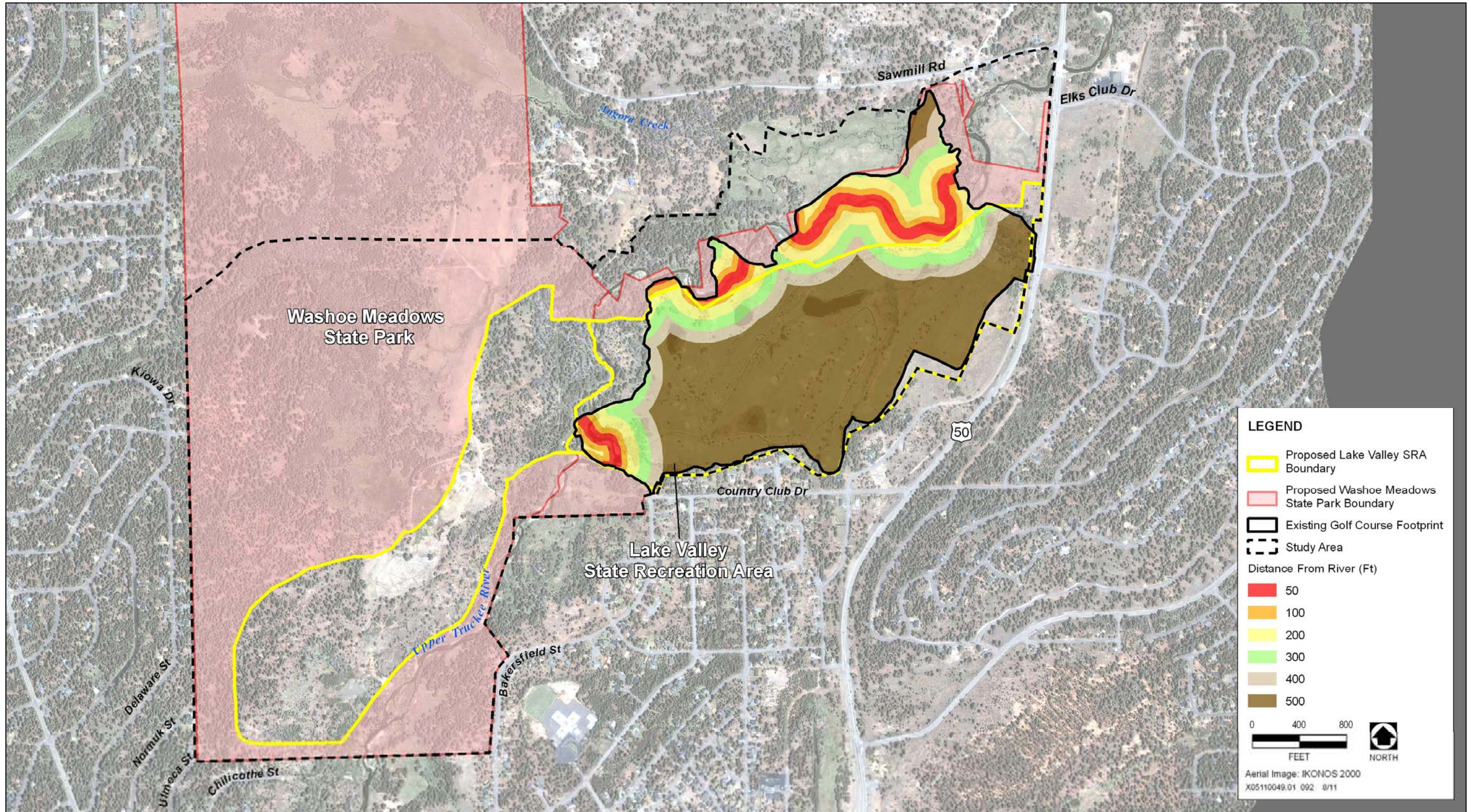
The proposed golf course reconfiguration would move much of the course into lands of higher capability, removing 5,532 linear feet of golf course currently adjacent to the Upper Truckee River (see Exhibits 4-1 and 4-2). West of the river, with the exception of 850 linear feet that would be adjacent to the river for playability and river crossing access, the relocated golf course would have a minimum native-vegetation buffer of approximately 75 feet. Most of the golf course would be at least 100 feet from the river.

Alternative 2 would reduce the amount of the golf course located within SEZ. It would not expand the area of golf course within SEZ. This is consistent with the policy quoted in the comment. Most areas between the river and golf course would be outside of the golf course footprint and Lake Valley SRA boundary and would be managed as part of Washoe Meadows SP. Vegetation would be similar to existing vegetation and would include native grasses, shrubs, and trees.

Although the golf course design is conceptual at this time, which means the precise outline and features of the course may be refined as more detailed design is developed, the location of the golf course footprint will not be modified beyond the Lake Valley SRA boundary shown in Exhibits 2-1 and 2-3 of this final EIR/EIS/EIS. The impact analysis and mitigation measures were developed and evaluated based on potential locations of the golf course within this defined area. Exact locations of holes, tees, and greens may change during final design, but the acreage of the golf course footprint will not exceed the amount evaluated in the final EIR/EIS/EIS, and the proposed golf course location will not extend beyond the Lake Valley SRA boundary shown in Exhibit 2-3. The reconfigured golf course design concept is intended to make the best use of the site, provide recreation values, and maintain a proper relationship to the environment and adjacent land uses. Golf course infrastructure and holes would generally avoid the most sensitive areas adjacent to the river. This would allow the river room to function more naturally and provide a more continuous riparian habitat corridor.

When possible areas for the reconfigured golf course were analyzed, major goals such as the following were considered:

- ▶ Minimize connectivity of the golf course and river.
- ▶ Minimize or avoid sensitive archaeological sites and sensitive ecological habitat.
- ▶ Maximize use of higher capability lands and lands previously disturbed by the golf course.
- ▶ Decrease the area of golf course within the floodplain, SEZ and adjacent to the river.

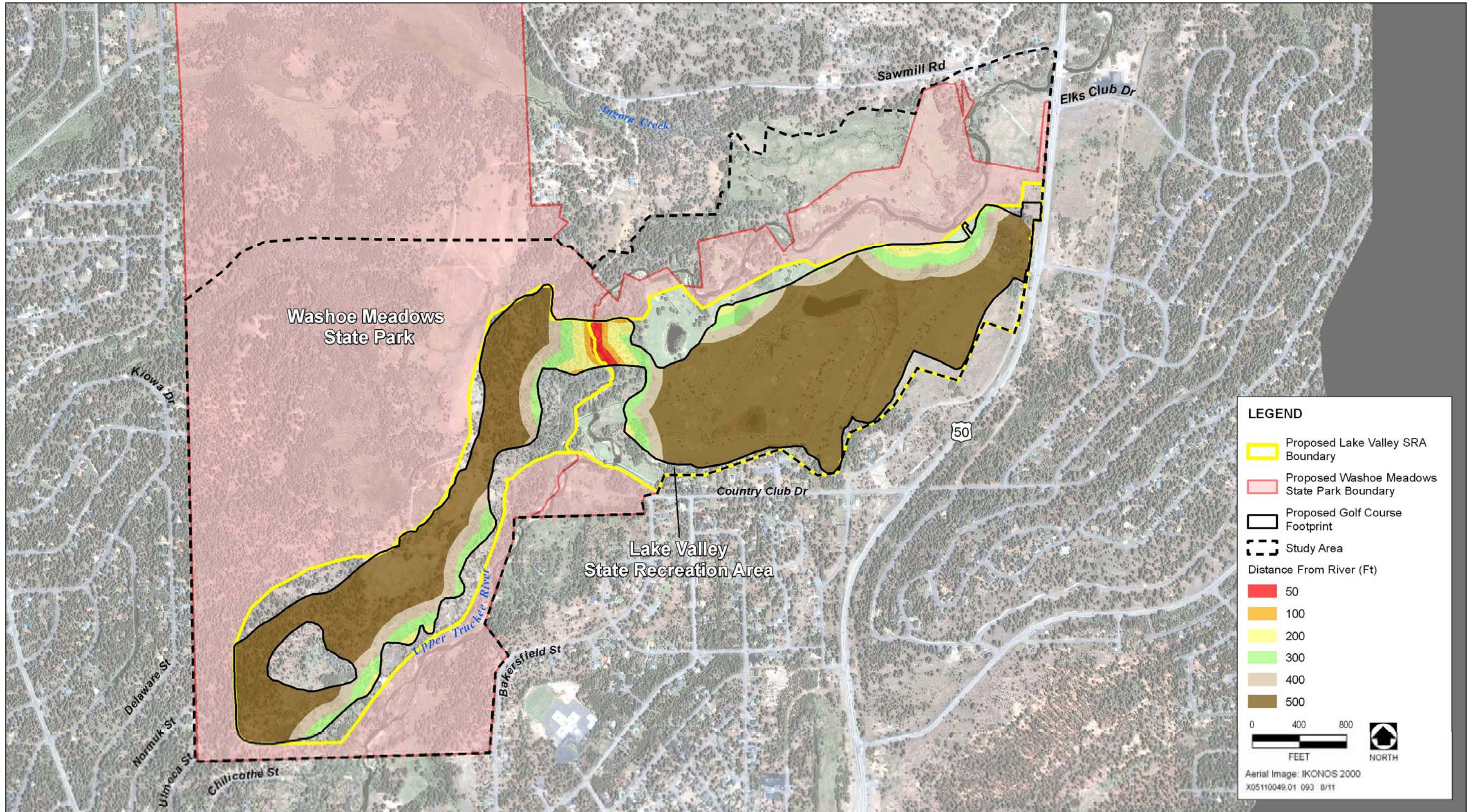


Source: California State Parks 2011

**Alternative 1 and 4 River Buffers**

**Exhibit 4-1**





Source: California State Parks 2011

**Proposed Preferred Alternative River Buffers**

**Exhibit 4-2**





As described above and in the draft EIR/EIS/EIS, restoration of the Upper Truckee River and reconfiguration of the Lake Tahoe Golf Course under Alternative 2 is consistent with policies in the TRPA Regional Plan related to golf course retrofitting within SEZs and protection and management of SEZs for their natural value.

Topographic and aerial exhibits that show subwatersheds within and surrounding the study area are presented in Exhibits 3.3-1 and 3.3-2 of the draft EIR/EIS/EIS. Mitigation Measure 3.3-1 (Alt. 2), “Provide On-Site Storm Drainage Facilities and Accompanying Stormwater Drainage Plan to Prevent Damage from Increased Runoff Discharged to Creek or River Channels,” has been incorporated as mitigation planned as part of the proposed Preferred Alternative. The mitigation measure includes the following performance criteria to be included final detailed project design:

- ▶ Stormwater facilities shall be installed in the subwatershed of each existing natural drainage (e.g., swales, seeps, creeks) that will experience project-related changes to topographic, soil, and/or vegetation cover.
- ▶ Peak runoff discharge from the stormwater system to each of the existing natural drainage swales, creeks, or the Upper Truckee River shall be equal to or less than preproject conditions up to the 10-year event.
- ▶ Nuisance perennial discharge of excess irrigation water shall be prevented.
- ▶ Where rerouting of drainages or point discharges from the stormwater facilities are necessary, those discharges shall be designed to prevent streambed or streambank erosion in the receiving water body.

Furthermore, Mitigation Measure 3.4-8 (Alt. 2), “Prevent Water Quality Degradation from Golf Course Operations,” includes performance criteria within the final stormwater system design to do all of the following:

- ▶ Limit opportunities for irrigation water and stormwater that will be in contact with managed golf course landscaping to interact with unaltered run-on from upslope areas within Washoe Meadows SP. This can be accomplished by incorporating buffer strips along downslope sides of intensively managed turf; intercepting and routing flows around landscape areas if needed; allowing natural drainages to continue to convey water from upslope without adding golf course runoff to those drainages, by routing the golf course stormwater to other artificial drainages; or implementing similar measures.
- ▶ Prevent irrigation and stormwater that will be in contact with managed golf course landscaping from interacting with shallow groundwater and/or surface water in the vicinity of natural seeps within Washoe Meadows SP. The measures required will be determined by site-specific analysis of the surface/groundwater interactions and could include installing sheet pile and/or other subsurface barriers.
- ▶ Minimize potential percolation and/or surface overflow from any new detention and/or storage pond features that will have irrigation or stormwater runoff from the golf course landscaping by including adequate liners and appropriate sizing.

State Parks and its concessionaire will also work with the Lahontan Regional Water Quality Control Board (RWQCB) to update the golf course’s chemical application and management plan as needed to update permit requirements for golf course operations.

See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for additional details on proposed fertilizer practices.

- AOB8-8 As discussed in Table 3.2-1, TRPA has goals and policies related to various resource areas that are all considered during review of any project. Consistency with goals and policies is considered equally for all resource topics; consistency with one goal or policy (e.g., for open space) is not more highly valued than consistency with any other goal or policy (e.g., for recreation or water quality). See Master Response Section 3.2, “Land Use,” for additional discussions of land trade.
- AOB8-9 The commenter is concerned about impacts of golf course reconfiguration on cultural resources. See Master Response Section 3.6, “Cultural Resources,” for additional discussion of cultural sites and preservation measures.
- AOB8-10 The commenter is concerned that expanding the golf course (under Alternative 2) to the west side of the river would have unknown impacts on sediments, fertilizers, pesticides, and herbicides. The commenter states that an additional 1,500 linear feet of the river would be adjacent to the golf course (under Alternative 2) and desires certainty that nutrients would not migrate to the groundwater or river. The commenter acknowledges that the draft EIR/EIS/EIS includes a discussion of the potential impacts and identifies mitigation measures for the final stormwater system design of Alternative 2. The commenter feels that Alternative 2 exposes the river to greater water quality risks than Alternatives 3 and 5.
- The commenter’s preference for Alternatives 3 and 5 over Alternative 2 is noted; this is consistent with the impact significance conclusion and mitigation requirements for Impact 3.4-8 presented in the draft EIR/EIS/EIS. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for additional discussion of fertilizer use. As shown in Table 2-1 and Exhibits 4-1 and 4-2, there will be a decrease in golf course adjacent to the river.
- AOB8-11 The commenter states that the project would not be consistent with applicable plans, policies, and regulations and refers to comment letter AOB31. See Master Response Section 3.2, “Land Use,” for a discussion of consistency with applicable plans, policies, and regulations; see responses to comment letter AOB31 for additional information.
- AOB8-12 The commenter states that siting criteria used to evaluate off-site alternatives were flawed and applied inconsistently. See response to comment AOB31-12 for a discussion of siting criteria used in the alternatives analysis.
- AOB8-13 The commenter states that the draft EIR/EIS/EIS did not adequately address land use changes and represent baseline conditions. The impacts of a project are evaluated based on the direct and reasonably foreseeable indirect physical changes in the environment that may be caused by implementing the project (on both a project-specific basis and in a cumulative context), and the setting or environmental baseline provides the starting point for that analysis. In Section 3.1, “Land Use,” the current “baseline” conditions are a result of historical and existing activities within the project area. The characterization of the existing setting is drawn from literature searches and information obtained from analysis of existing land use and policy information, consultation with agencies, and additional information as appropriate. Here, the current baseline conditions have been described to provide a clear context for understanding and evaluating the potential project-related impacts on land use. Potential impacts on land uses in the study area are specifically discussed in Section 3.2, “Land Use,” of the draft EIR/EIS/EIS . Potential impacts on the

physical environment resulting from changes in land use were discussed in each respective resource section. Additional details regarding habitat value and consistency with policies and procedures is presented in Master Response Section, “3.2, “Land Use.”

- AOB8-14           The commenter is concerned that impacts on shallow groundwater from the bridge and the restroom sewer connection proposed under Alternative 2 were not adequately addressed. The proposed restrooms under Alternative 2 would be located adjacent to existing sewer utilities. The restrooms could be connected to these sewer utilities under typical permit conditions without incurring any long-term effects on groundwater flows, levels, or quality.
- The proposed bridge under Alternative 2 would include footings that may interact with shallow groundwater locally. However, footings would have no effect on groundwater and several other bridges in the study area would be removed as a beneficial effect of this alternative. Alternative 2 would also result in benefits from improved river processes and overbank flooding for recharge of the shallow aquifer. The localized adverse effects that could occur during construction of the new bridge would be addressed adequately by Mitigation Measure 3.4-6 (Alt. 2). The net long-term effect on groundwater from bridge footings in the study area would be beneficial under Alternative 2.
- AOB8-15           The commenter believes that scenic impacts were minimized and feels that grading should have been addressed. The golf course layout has been designed to minimize grading and provide buffers. See response to comment I6-3.
- AOB8-16           The commenter feels that baseline biological conditions are inaccurate. See Master Response Section 3.3, “Biological Resources.”
- AOB8-17           The commenter states that the draft EIR/EIS/EIS should have evaluated an alternative that would involve less intensive recreation opportunities and restore the river. As discussed in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, Alternative 5 and Alternative 3 had less recreation opportunity and still carried out restoration goals.
- AOB8-18           The commenter disagrees with the methods and assumptions used in the economic analysis. See Master Response Section 3.7, “Economics.”
- AOB8-19           As discussed in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, under Alternative 2, drainage would be designed to collect runoff on the course, then run it through natural biofilter vegetation buffers to ensure that the runoff would not run directly into the river or the unnamed creek. Also, source reduction practices are in place within the management zones around ponds; thus, fertilizer and pesticide use is limited near water bodies. Implementing improved water conservation strategies would be an integral part of this alternative. The irrigation and drainage system around the existing holes would be replaced with new, more efficient computerized technology that would control the rate, amount, and timing of irrigation water application to minimize soil erosion, runoff, and movement of fertilizer and pesticides. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for additional discussion of fertilizer use.
- AOB8-20           The commenter believes that the evaluation of impacts on wildlife is inadequate. See Master Response Section 3.3, “Biological Resources.”
- AOB8-21           The commenter refers to letter AOB9. See responses to letter AOB9.

AOB8-22

The commenter's support for Alternative 3 or another alternative that meets the primary goal of the project to restore the river and save Washoe Meadows SP is noted. See Master Response Section 3.2, "Land Use," for a discussion of the statute and litigation settlement agreement.



# LIVE OAK ASSOCIATES, INC.

an Ecological Consulting Firm

AOB-9

November 12, 2010

Bill Yeates  
Kenyon Yeates LLP  
2001 N Street, Suite 100  
Sacramento, CA 95811

**SUBJECT: Comments on the Draft EIR/EIS/EIS Upper Truckee River Restoration and Golf Course Reconfiguration Project (SCH# 2006082150).**

Dear Mr. Yeates:

At your request I have reviewed the Draft Environmental Impact Report/ Environmental Impact Statement/Environmental Impact Statement (EIR/EIS/EIS) regarding the Upper Truckee River Restoration and Golf Course Reconfiguration Project (SCH# 2006082150). I respond to this EIR/EIS/EIS as an ecological consultant with over 20 years preparing such documents. I am co-founder and Principal of Live Oak Associates, Inc., (LOA) an ecological consulting firm based in California with three offices, Oakhurst, San Jose and Bakersfield. LOA has supervised the preparation of more than 2000 CEQA/NEPA studies in the past fifteen years. As such, our firm specializes in the preparation of endangered species evaluations, wetland analysis, wildlife/human conflicts, permit assistance relating to the Clean Water Act and federal and state endangered species acts and the preparation of environmental documents specific to CEQA and NEPA.

I have reviewed the EIR/EIS/EIS and other relevant material for this region of the Sierra Nevada. Based on this review, it is my professional opinion that this EIR/EIS/EIS is seriously flawed and inadequate for decision makers to properly evaluate the range of project alternatives analyzed by this environmental document.

While there are many inadequacies related to this EIR/EIS/EIS that are being addressed by others, I have chosen to focus on four areas that based on my professional opinion prohibit this document from fully disclosing the true effects of each of the alternatives. These areas include inadequacies related to: 1) mischaracterization of the project description for some components of alternatives (i.e., particularly Alternative 2); 2) serious mapping errors in characterizing the available habitats within the study area from which all beneficial and adverse effects for each alternative was assessed; 3) fully describing the fen resources located in Washoe Meadows State Park (WMSP) and inadequately evaluating the substantial impacts of relocating a portion of the golf course to the west side of the Upper Truckee River as proposed in Alternative 2; and, 4)

AOB9-1

San Jose: 6840 Via del Oro, Suite 220 • San Jose, CA 95119 • Phone: (408) 224-8300 • Fax: (408) 224-1411  
Oakhurst: P.O. Box 2697 • 39930 Sierra Way, Suite B • Oakhurst, CA 93644 • Phone: (559) 642-4880 • Fax: (559) 642-4883  
Bakersfield: 8200 Stockdale Highway, M10-293 • Bakersfield, CA 93311

failing to fully assess adverse impacts to wildlife movements in Washoe Meadows State Park of the golf course development proposed in Alternative 2.

AOB9-1  
cont.

### 1. Mischaracterization of the Golf Course Design Concept for Alternative 2

The project design for the golf course (page 2-51) has been mischaracterized as a links style course, reminiscent of Scottish golf courses. I have worked for applicants that have envisioned designing and building link-style courses, and in all cases, these courses were being proposed and considered with very minimal grading and removal of the natural landscape (i.e., very limited tree removal or trimming of branches). In the end, given the constraints with designing and operating a true links-style course, these applicants gave up on the notion and ended up designing more traditional courses. Every hole on the west side of the river for Alternative 2, would require substantial logging of 45 acres of naturally occurring conifers (2<sup>nd</sup> and 3<sup>rd</sup> growth), totaling over 1500 trees (golf course and access road) with a dbh of 10" or greater.

The EIR/EIS/EIS states (pg 2-51):“While tree removal would be substantial under this alternative the layout was designed to minimize this effect by placement in relatively open and **previously disturbed areas** (emphasis added) that would have the least impact on the ecosystem.”

The EIR/EIS/EIS inaccurately describes the baseline environmental conditions that exist within the area of WSMP where the golf course will be developed. Although, as noted by the Sierra Nevada Ecosystem Project (SNEP 1996), about two thirds of the Tahoe Basin forests were logged from 1860 to 1930, WSMP (and most of the forests within the Basin), retain high conservation value as noted by the high species richness and diversity of the terrestrial vertebrates known to use the mosaic of habitats within its boundaries.

AOB9-2

The 45-acre forested land that would be logged for the golf course consists of fairly typical stands of Jeffrey pine and lodgepole pine forests in the Basin. This forest consists of good structural diversity supporting trees of various ages and sizes, with many down trees and snags providing important cover and forage for quite a number of regional wildlife species. These forested lands are typical of many of the historically logged forest found in the Basin (see SNEP 1996 report). The EIR/EIS/EIS provides a number of exhibits that clearly show the structural diversity of the forest to be logged. Refer to Exhibits 3.7-1, 3.7-9, 3.7-10, 3.7-11, and 3.7-18 as just some examples supporting the fact that the forested areas proposed to be logged for Alternative 2 have very good conservation value. These exhibits also provide factual evidence that the conservation value of these forested lands is substantially enhanced by the occurrence and inclusions of large meadows, wet-meadow complexes and the fens. When compared with a homogenous land cover type (e.g., a lodgepole pine forest), the heterogeneity of habitats found in WSMP supports an unusually high bio-diversity due to the abundance of the different types of vegetation communities.

Additionally, some areas remain that were disturbed by a gravel mining operation a few decades ago, but the largest gravel pit from this operation was restored by State Parks a number of years ago and this restored area is exhibiting great success – a successful restoration project by State Parks that under Alternative 2 would be converted to a golf course. Exhibit 3.7-18 provides

evidence that State Parks restoration effort has proved to be successful, as this area is continuing to improve in value.

The majority of the remaining disturbed areas within this portion of WMSP are due exclusively to State Park action in recent years. These include but are not limited to a large stockpile of soil (see Exhibit 3.7-19 for the large pile of soil and recent work on the their staging area), a large stockpile of woodchips, the placement of large rocks (i.e., fist-size) on an access road that parallels the river, extensive tree cutting along the edge of the large meadow complex and the river.

Thus, some small areas can be correctly characterized as historically disturbed (e.g., the remaining gravel pit) or more recently disturbed by State Parks (stockpiling of soil and woodchips), but the vast majority of the area proposed for several golf holes support habitats that have good conservation value that are furthered enhanced by the habitat mosaic supported in this region of WMSP (e.g., large wet meadow complex, fens).

AOB9-2  
cont.

Therefore, the golf course design should not invoke images of a links-style course, as extensive changes to the existing landscape must occur to build the course on the west side of the river (logging of over 1500 trees). Further, it is misleading to assert that golf course is being placed on lands that were previously disturbed as that characterization could be levied at any forest in the Basin. Finally, the EIR/EIS/EIS misleads the public and decision-makers by stating that these areas are of low conservation value, as quite the opposite is true, based simply on the full complement of wildlife known to inhabit and pass through this area of the WMSP. The list of wildlife species using the Park is quit extensive but just a few of the species observed by Park visitors over the last year include (but not limited to) quail, cedar waxwing, meadowlark, Clark's nutcracker, kingfisher, osprey, black-crowned night heron, dipper, great horned owl, pileated woodpecker, red napped sapsucker, Audubon's warbler, deer mice and other small mammals, chipmunks, golden mantle squirrel, Douglas tree squirrel, mule deer, coyote, black-bear, and bobcat. These represent just a few species that are observed each year by Park visitors.

## 2. Mapping Errors

The habitat map (Exhibit 3.5-1) generated for the EIR/EIS/EIS has incorporated serious errors into it that has eliminated a fair analysis of the substantial physical change Alternative 2 will have on the existing environment. A very casual review of the habitat map will find that a very large wet-meadow complex (20 to 30 acres in size) is depicted as Lodgepole Pine – mesic type; clearly it is not. This meadow greatly exceeds (by ten-fold or more) the size of the minimum mapping unit as noted for various other “mapped” habitat types on this exhibit, so it cannot be concluded that it is too small to accurately map. Exhibits 3.7-9 and 3.7-10 provide clear evidence of the large size of this wet meadow complex.

AOB9-3

In addition, water that drains from this wet meadow drain directly into the Jeffrey Pine/Dry Meadow (which is more meadow than forest) and Lodgepole Pine – dry type, thereby calling into question the entire habitat classification scheme, as significant areas of the upland “dry-type” forest areas are drained by the wet-meadow complex.

The current vegetation classification scheme accepted by the CDFG is Sawyer et al. (2009) and previous to this for several years it was Sawyer and Keeler-Wolf (1995). The first edition of Sawyer and Keeler-Wolf (1995) supplanted previous classification schemes for California such as Holland (1986). As noted by CDFG's "Vegetation Classification and Mapping Program" (Sept 2003 edition found at [http://www.dfg.ca.gov/biogeodata/vegcamp/natural\\_communities.asp](http://www.dfg.ca.gov/biogeodata/vegcamp/natural_communities.asp)). As quoted in this document:

"The Department of Fish and Game has adopted the National Vegetation Classification System (Grossman et al. 1998), which is expressed in this state by the "Manual of California Vegetation (Sawyer and Keeler-Wolf 1995). This hierarchical system applies quantifiable classification rules to define floristic units known as alliances, and below them, associations."

In order to fully disclose impacts (both beneficial and adverse) from the various alternatives, the habitat maps need to be corrected and updated based on the current habitat classification scheme advocated by the resource agencies. The current habitat map, in particular, completely mischaracterizes and under-represents adverse impacts (both direct and indirect) to various habitats of developing a golf course within WMSP as proposed in Alternative 2. For example, logging the Lodgepole Pine and Jeffrey Pine habitats between the wet meadow (not currently mapped correctly) and the river will likely result in impacts to the hydrologic connection from the meadow to the river, and will also result in indirect impacts to the meadow such as reduced or altered use patterns by regional wildlife.

AOB9-3  
cont.

Specifically, the golf course relocation of Alternative 2 requires logging areas immediately adjacent to the unmapped wet-meadow complex. In some cases, the habitat map implies that the logged area is a lodgepole pine/dry meadow, yet water is draining from the wet-meadow complex through the lodgepole pine/dry meadow toward the Upper Truckee River. The EIR/EIS/EIS provides no analysis of how logging adjacent to the meadow, placing a golf course with irrigation, maintenance, etc. will effect the ecology of this meadow. In my professional opinion, that at the very least it would substantially affect the hydrology in the meadow, eliminate the hydrologic connections from the wet-meadow through the logged area being converted to golf, and affect the spatial use patterns of the regions wildlife, both within the unmapped wet-meadow and the forested lands to be logged. Impacts I might point out that would not occur under Alternatives 3, 4 and 5.

### 3. Fen Resources

Fen's are considered very sensitive biological resources by local and state resource agencies (e.g. TRPA, CDFG, Regional Water Quality Control Board). For example, fens are covered by Goal #3 of TRPA's Goals and Policies which is designed to "Conserve threatened, endangered, and sensitive plant species and uncommon plant communities of the Lake Tahoe Basin." Policy 1 under this goal states: "Rare examples of Lake Tahoe's natural vegetation should be preserved for their ecological and local significance." This policy goes on to encourage close cooperation between TRPA and other agencies responsible for the protection and management of the Basin's natural resources. The EIR/EIS/EIS confirms the importance of fens by noting (pg 4-11) "The V-2 threshold calls for providing the nondegradation of the natural qualities of any plant

AOB9-4



community that is uncommon to the Tahoe Basin or of exceptional scientific, ecological or scenic quality. The spring/fen complexes in the Washoe Meadow SP are examples of plant communities that are uncommon in the Tahoe Basin and are included under this threshold.”

CDFG gives all fen complexes in the state an imperiled state ranking (as measured by rarity, trends and threats) of either an S2? or S3?. The “?” denotes an inexact numeric rank but available information best places it within the rank it is given. A vegetation alliance given a S2 (or even an S3) implies that it is considered a high inventory priority by the state, so that these sensitive resources can be monitored and tracked, aiding long-term conservation of them. Other ecologists (see Cooper and Wolf 2006, and Sawyer et al. 2009) describe the ecological importance of fens, their rarity, and their sensitivity to human disturbance.

While the EIR/EIS/EIS correctly characterizes the sensitive nature of fens and their ecological rarity and importance to WMSP, the environmental document provides a wholly inadequate assessment of how the golf course component of Alternative 2 would adversely impact many of the fen complexes within WMSP.

Impact 3.5-3 (pg 3.5-69-71) notes that “...Alternative 2 proposes to avoid direct effects on spring complexes by designing the layout of the golf course holes around or away from these areas and by including a protective buffer. Because the design to the golf course holes is conceptual and not finalized, potential for the final design, construction, and operation of these holes to inadvertently degrade this sensitive biological resource exists without more specific design parameters and measures to avoid direct or indirect effects on the spring complexes.”

AOB9-4  
cont.

Based on this statement in the EIR/EIS/EIS neither the public nor public decision makers will know whether the golf course will avoid impacts to any existing fens until there is a final design of the golf course. The document inappropriately suggests that the future golf course design will accommodate the sensitivity of the fen habitat through design and avoidance measures. Encircling a sensitive resource with human dominated landscape almost never works and at the very least usually degrades them from the baseline condition.

The fens in WMSP are best characterized as slope fens and their hydrology and unique vegetation structure are very sensitive to disturbance, particularly anthropogenic effects. Not well portrayed in the EIR/EIS/EIS is the fact the topography in this region of WMSP slopes noticeably from the river to the residential community to the west. Based on the conceptual layout of the course, four holes will require logging on sloped lands adjacent to and in some cases upslope from the fens. The logging adjacent to the fens will not only increase sediment loads in the Upper Truckee River and possibly the fens (i.e., logging is known to be a major contributor to sedimentation of aquatic features), but it may also substantially alter the hydrology critical to the conservation of these fens. Logging adjacent to fens should be avoided because the short-term and long-term effects are so poorly understood. In addition, golf courses are required to be irrigated and managed, and what effects these activities would have on the fens hydrology and plant life has not been analyzed by this EIR/EIS/EIS. As noted previously, at least one hole is upslope of the fens while the other notes are adjacent. The underlying hydrology of fens is complex, and anthropogenic affects even some distance from fens can adversely affect their function.

Given the poorly understood hydrology of fens, the lack of analysis in the EIR/EIS/EIS and limited knowledge of how substantial alteration of landscapes (e.g., logging of several hundred trees adjacent to the fens, placing golf turf near and in some cases upslope from them, operations and maintenance of the adjacent golf holes) may adversely effect these fen complexes, it is quite likely that it is not technically feasible to avoid significant adverse impacts to them or mitigate these impacts. The EIR/EIS/EIS has provided no guidelines to evaluate how the golf course might avoid the fen complexes. As noted above, it is quite possible (and some would argue probable) that in the end it is not technically feasible to construct and operate a golf course that does not degrade the adjacent fens – resulting in a significant unavoidable effect to fens, something not contemplated by the EIR/EIS/EIS, and inconsistent with TRPA’s Regional Plan.

AOB9-4  
cont.

#### **4. Wildlife Movement Associated with Alternative 2.**

The EIR/EIS/EIS concluded that “Golf course relocation would remove approximately 60 acres and fragment upland habitat west of the Upper Truckee River. This area is not expected to function as a significant movement corridor for common or sensitive wildlife species.” This conclusion is not supported by the baseline conditions that exist on the ground.

The EIR/EIS/EIS is wrong to suggest that riparian areas are the only place that wildlife movement occurs. Alternative 2 while it restores the river and increases the functioning of the riparian habitat along the river, including facilitating regional movement for some wildlife species, also constrains wildlife movement by expanding significant elements of golf play on both sides of the river, something Alternatives 3, 4, and 5 do not do.

The maintenance of habitats and connective pathways for wildlife species sensitive to human-caused landscape change is one of the most pressing issues in conservation biology. The fate of wide-ranging species depends critically on planning efforts that simultaneously consider the habitat requirements and ecological processes that motivate animal movement over both short and long distances. However, more specific information is usually lacking on the features of wildlife habitat that promote or impede the linkage and maintenance of population core areas on large landscapes, including vegetation, topography, and anthropogenic barriers. To that end, this EIR/EIS/EIS provides no factual basis to evaluate the baseline conditions and compared to the outcome of the various alternatives. For example, the environmental analysis mistakenly concludes that substantial regional wildlife movement is not presently occurring within the mosaic of upland habitats within WMSP. This appears to be due largely to a naïve belief that permeates the EIR/EIS/EIS that regional wildlife movement occurs wholly (or nearly so) along creeks and riparian zones. This is factually incorrect – while riparian zones are important, if not critical for regional movements of some wildlife species and often serve as a focal point for conservation, by themselves they are often not enough. To protect just a riparian corridor, often creates a pinch-point linkage that will not be used by all species. Some species prefer open habitats, swift moving water can impede movement of others (e.g., small mammals) and habitat generalists (e.g., particularly medium to large carnivores) move while foraging and may or may not use a riparian zone for movement.

AOB9-5

The space use needs of many species, particularly large mammals, are rarely considered at spatial scales relevant to the species. Often these efforts are based on legal and not bioregional boundaries and, as such, cannot easily accommodate the conservation of wildlife habitats that

extend beyond the legal boundaries of sites or planning efforts. In addition, simplistic attempts to identify “movement corridors,” (e.g., it must be the riparian zone) usually focus on delineating “corridors,” which can best be defined as “routes that facilitate movement of organisms between habitat fragments” (Hilty et al. 2006:5). Corridor delineation efforts, however, typically invoke simplistic judgment-based exercises describing static habitat patterns, and do not explicitly integrate the ecological *processes* of animal movement (e.g., dispersal). Moreover, corridor studies tend to occur at relatively small spatial scales and emphasize one possible pathway between patches of habitat presumed to be suitable. The challenge is that due to the unrealistic and overly simplistic assumptions inherent in this simple word exercise is that a single “optimal” corridor gets defined for the region, completely inconsistent with how various species known to occur in WMSP (e.g., mule deer, black bear, coyote, bobcat, various small mammals that generally avoid the riparian zones, avian species that are habitat generalist) use the mosaic of habitats (including the fens) that occur within the WMSP. For example, movement patterns for a number of wildlife species are substantially influenced by the presence of the fen complexes. The number of game trails that innervate the fen complexes and the number of species regularly observed at them provides ample evidence of their unique influence on spatial use patterns for this region of the Park. Surrounding the fens with a golf course will obviously degrade their influence on wildlife spatial use patterns in the Park, an impact not disclosed by this EIR/EIS/EIS.

This habitat mosaic on the west side of the river in conjunction with the restored riparian areas provide for a broad area for many species of wildlife to use as a pathway from Angora Ridge and the South Upper Truckee Watershed. While many species are attracted to the riparian corridor, others, like habitat generalists (most medium and large carnivores), will not be attracted to the riparian corridor. Instead, these species will move across a broad front of upland habitats. Some species in fact prefer more open habitats and would be less likely to move through the riparian corridor (e.g., species that prefer grasslands such as meadow larks). For these reasons not discussed in this EIR/EIS/EIS, Alternative 2 limits the regional movement of species when compared with Alternatives 3, 4, and 5. As an expert on habitat connectivity, I find the assertion that Alternative 2 will result in a less than significant effect on “wildlife movement corridor” completely inconsistent with the ecological literature regarding space use by wildlife in regions such as WMSP.

Inherent in the design for Alternative 2 is converting the riparian corridor into a regional “pinch-point” (e.g., narrow corridors) by degrading the upland habitats used by the various habitat generalists in WMSP. Often times, conservation biologists are constrained to preserving and enhancing “pinch-points” as frequently that is all they are left with. This is never the preferred approach. Preservation and enhancement of riparian corridors in conjunction with managing the broad mosaic of upland habitats in WMSP is by far, the best conservation approach. This region of the Basin is already impacted and constrained, while Alternative 2 improves the riparian component, it substantially degrades the important upland component of this regional pathway.

We lack the ability to precisely determine just how narrow or how few connections can be maintained and yet retain the important functionality of facilitating regional movement of wildlife. Errors in judgment are catastrophic and irreversible. Therefore, the EIR/EIS/EIS should be modified to recognize that Alternative 2 would result in a significant impact to wildlife

AOB9-5  
cont.

movement corridors, something that Alternatives 3, 4 and 5 will not do. Pathways that maintain regional connections amongst suitable habitat patches are site-specific and are not easily mitigated. The failure to protect the existing broad upland pathway through the habitat mosaic should have been recognized as a significant unavoidable impact in the EIR/EIS/EIS.

AOB9-5  
cont.

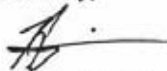
### **Conclusion**

The EIR/EIS/EIS provides a misleading comparative evaluation of the various alternatives (see Table 2-3). This document suggests that there is little difference in overall adverse impacts from Alternative 2 when compared with Alternatives 3, 4, and 5. Nothing could be further from the truth and is not supported by the baseline environmental conditions that exist at WMSP. Even though the EIR/EIS/EIS inadequately evaluates many of these impacts, sufficient information exists within the environmental document to clearly demonstrate that Alternative 2 will result in many more significant adverse impacts on the baseline wildlife habitat conditions than Alternatives 3, 4 and 5. Just a few have been noted above and these include significant and likely unavoidable impacts to fens; significant impacts related to logging nearly 45 acres of forested land in WMSP, significant impacts to a gravel mining area restored to meadow habitat; significant impacts to the wet-meadow complex erroneously mapped as Lodgepole Pine mesic type; and significant impacts to wildlife movement corridors.

AOB9-6

If you have any questions regarding my comments, please contact me at your earliest convenience.

Sincerely,



Rick A. Hopkins, Ph.D.,  
Principal and Senior Conservation Biologist

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# LIVE OAK ASSOCIATES, INC.

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## COMPANY PROFILE

Founded in 1995, Live Oak Associates, Inc. (LOA), provides professional ecological consulting services to a diverse and expanding clientele throughout California and the western United States. Our clients rely on our innovative team of expert biologists and skilled technical and support staff for accurate data collection, sound scientific analysis, and professional document preparation in order to protect sensitive biotic resources while securing environmental clearances for proceeding with land and water development projects.

In order to meet our clients' diverse needs, LOA has assembled a team of more than 30 scientists representing a comprehensive range of biological disciplines, from general wildlife and plant ecology to specializations including herpetology, entomology, ornithology, and aquatic and wetland ecology. We are experienced in navigating the permitting and other regulatory processes required by city, county, state, and federal agencies with jurisdiction in California and neighboring states. From pre-construction raptor surveys to ESA Section 7 consultations, from wetland mitigation monitoring to development of habitat conservation plans, LOA offers timely expertise and thoughtful solutions regarding biological resource issues. Additionally, our project managers are well-rounded biologists experienced in overseeing any project through all phases of its life cycle (i.e., planning, design, implementation, monitoring, and adaptive management).

Our focus is to rely on sound ecological principles in evaluating the distribution and abundance of sensitive biological resources on or in the region of a project site, clearly evaluate the project's effects both on a site-specific basis and on a regional scale that is relevant to the species or resources (e.g., wetlands) that may be impacted by the project, and then provide for appropriate mitigations to offset these impacts.

More importantly, LOA relies not only on conventional methodologies but we have also developed the use of robust and advanced spatial tools that are theoretically grounded in landscape ecology. The ecological scale for most species often exceeds the size of project sites and land management units by several fold and most conventional approaches that rely on overly simplistic decision rules and tools (e.g., GIS overlays, least-cost pathways, etc.) are not well equipped to inform conservation strategies at relevant spatial scales. The spatial tools that LOA has developed are better suited to inform conservation strategies for a wide variety of species at the relevant spatial scales.

LOA's reputation for providing our clients with the highest level of service, GIS and graphics, and biological reports using state-of-the-art techniques has increased incoming business without diminishing our capacity to consistently meet and exceed our deliverables. Since 1995, Live Oak Associates has worked with over 670 clients on more than 3,000 projects.

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San Jose: 6840 Via del Oro, Suite 220 • San Jose, CA 95119 • Phone: (408) 224-8300 • Fax: (408) 224-1411  
Oakhurst: P.O. Box 2697 • 39930 Sierra Way, Suite B • Oakhurst, CA 93644 • Phone: (559) 642-4880 • Fax: (559) 642-4883  
Bakersfield: 8200 Stockdale Highway, M10-293 • Bakersfield, CA 93311



# LIVE OAK ASSOCIATES, INC.

an Ecological Consulting Firm

**RICK A. HOPKINS, PH.D.**  
**Principal**  
**Senior Conservation Biologist/Ecologist**

## EDUCATION

- Ph.D. Wildlands Resource Science, University of California, Berkeley, CA. 1990.
- Dissertation Title: Ecology of the cougar in the Diablo Range.
- M.A. Biology, San Jose State University, San Jose, CA. 1981.
- B.A. Wildlife Zoology, San Jose State University, San Jose, CA. 1976.

## AREA OF EXPERTISE

Population ecology, mammalogy, predator ecology, survey techniques, wildlife/habitat relationships, conservation biology, threatened and endangered species, and environmental regulations (CEQA, NEPA, FESA, CESA)

## PROFESSIONAL EXPERIENCE

- Live Oak Associates, Inc., (formerly Hartesveldt Ecological) Oakhurst, CA. Co-Owner, Vice-President, Senior Wildlife Biologist. 1999 to Present
- Consulting Biologist 1990 to present
- San Jose State University, San Jose, CA. Spring Lecturer. 1991
- University of California at Berkeley, Berkeley, CA. Research Assistant. 1984 to 1989
- San Jose State University, San Jose, CA. Lecturer, 1983 to 1985
- University of California at Berkeley, Berkeley, CA. Teaching Assistant. 1982 to 1983
- San Jose State University, San Jose, CA. Graduate/Teaching Assistant, Biology. 1977 to 1981

## PROFESSIONAL TRAINING

Habitat Evaluation Procedure (HEP). U.S. Fish and Wildlife Service. 6/92

## MEMBERSHIPS IN PROFESSIONAL ORGANIZATIONS

Wildlife Society, American Society of Mammalogists, Society for Conservation Biology, Ecological Society of America

## QUALIFICATIONS

Dr. Hopkins is a national recognized wildlife ecologist whose training and research has focused on population ecology and movements of wildlife, particularly mammalian carnivores and threatened and endangered (T&E) wildlife species. His areas of expertise include the following:

- **Special status Species Surveys.** Dr. Hopkins has designed and managed a considerable number of surveys for special status species and/or their habitats during the last 20 years. While Dr. Hopkins is a broadly trained ecologist with experience with several wildlife species, he has dedicated the last 35 years to the study of mammalian carnivores. During the last 20 years he has focused a great deal of attention in studying the distribution of the San Joaquin kit fox within its range. He has continued to search for ways to establish survey techniques that will provide statistical rigor to the methods employed to ascertain the presence or absence of wildlife species on sites, particularly in marginal habitats. He has also assisted his clients with mitigation that reduced impacts to such species, including (but not limited to) listed crustaceans (e.g., vernal pool fairy shrimp), Bay checkerspot butterfly, Mission blue butterfly, San Bruno elfin, Callippe butterfly, Valley elderberry longhorn beetle, California tiger salamander, California red-legged frog, western pond turtle, blunt-nosed leopard lizard, Alameda whipsnake, western burrowing owl, Swainson's hawk, golden eagle, bald eagle, Buena Vista Lake shrew, giant kangaroo rat, salt marsh harvest

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San Jose: 6840 Via del Oro, Suite 220 • San Jose, CA 95119 • Phone: (408) 224-8300 • Fax: (408) 224-1411  
Oakhurst: P.O. Box 2697 • 39930 Sierra Way, Suite B • Oakhurst, CA 93644 • Phone: (559) 642-4880 • Fax: (559) 642-4883  
Bakersfield: 8200 Stockdale Highway, M10-293 • Bakersfield, CA 93311

mouse, San Joaquin kit fox. He has also contributed to the development of the California Wildlife Habitat Relationships Program and is trained in Habitat Evaluation Procedures.

- **Resource Conflict Resolution:** Rick has provided consultation regarding human/wildlife conflicts (particularly with large carnivores such as the cougar) to City and Counties, state legislatures, and Fish and Game Commissions, in several western states during the last 30 years.
- **Landscape Scale Conservation Planning.** Rick has participated in state-wide efforts to identify the important landscape linkages remaining in the state (i.e., Missing Linkages Conference) and in regional efforts such as the San Francisco Bay Area Upland Goals Workshop and TNC Central Coast Ecoregional Workshop. These efforts have focused Rick's interest in using theoretically grounded spatial tools to inform conservation planning at relevant spatial scales. An integral part of this process is working with applicants and landowners to identify suitable landscapes to conserve and manage to fulfill any required state or federal obligations that the regulated community may have incurred as part of their projects. Presently he is using these approaches in the development of a multi-species HCP for the 47,000 acre Elk Hills Oil Field, a cougar habitat management plan for 35,000 km<sup>2</sup> area of Southern California, and developing conservation strategies for large-scale solar projects in central to southern the San Joaquin Valley.
- **Endangered Species Consultations.** Dr. Hopkins has prepared supporting material for both section 7(a) and 10(a) consultations with the U.S. Fish and Wildlife Service. As Principal, he has supervised the collection of data on listed species within project areas, analysis of project impacts, the development of mitigation measures, and has been the primary contact with the resource agencies during the process. Dr. Hopkins has prepared a number of Habitat Conservation Plans for a variety of projects.
- **Preparation of CEQA/NEPA Documents.** Dr. Hopkins has supervised interdisciplinary teams of biologists characterizing the biological setting of project sites and planning areas, determining project impacts, and developing conceptual mitigation plans consistent with the requirements of CEQA and NEPA for over 2000 projects during the last 20 years.

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1997. 5th Mountain Lion Workshop. California Statewide Estimates And Trend Analysis: Lessons From The Diablo Range. San Diego, California.
1997. Annual Meeting of the American Society of Mammologist. Townsend, S.E., R. A. Hopkins, and R.R. Duke. Distribution of the San Joaquin Kit fox in the North part of its Range. Stillwater, Oklahoma.
2000. An Invited Ecological Co-chair for the Central Coast Ecoregion of California for the Missing Linkages Conference: Restoring Connectivity to the California Landscape. The mission of the conference was "to bring together land managers and planners, conservationists, and top scientists from each ecoregion in the state to identify the location of, and threats to the most important movement corridors for California's wildlife."
2000. California Wilderness Conference. Invited Panel Participant for the Wilderness Management Section. Other panel members included Dr. Peter Moyle, Dr. David Chipping, Dr. Robert Stack.
2002. Defenders of Wildlife Carnivore Conference. November 2002. Mystery, Myth and Legend, Challenges for the Management of Cougars. Monterey, California.
2003. 7<sup>th</sup> Mt. Lion Workshop. May 2003. Mystery, Myth and Legend: The Politics of Cougar Management in the New Millennium. Rick Hopkins. Jackson, Wyoming.
2003. 7<sup>th</sup> Mt. Lion Workshop. May 2003. Management of cougars (*Puma concolor*) in the western United States. Deanna Dawn, Michael Kutilek, Rick Hopkins, Sulehka Anand, and Steve Torres.
2004. Science and the Endangered Species. June 2004. CLE Endangered Species Conference, Santa Barbara, California. An invited panel member.
2005. The Western Section of the Wildlife Society. A New Paradigm for Cougar Conservation and "Management" in the 21<sup>st</sup> Century. Rick Hopkins, Chris Pupouchis, and Deanna Dawn. Sacramento, California, February 2005.
2005. 8<sup>th</sup> Mountain Lion Workshop. Conservation strategies for cougars in Riverside County, California: from models to management. Rick A. Hopkins, Brett Dickson and Brad McRae. Leavenworth, Washington, May 2005.
2006. International Association of Landscape Ecologist. Least cost path on steroids: connectivity models from circuit theory. Brad McRae, Brett Dickson, and Rick Hopkins. San Diego, California. March 2006.
2006. Society of Conservation Biology Annual Meeting. Conservation Strategies for Cougars in the Land of Oz, From Models to Management. Rick A. Hopkins, Brett Dickson, and Brad McRae. San Jose, California. June 2006.
2006. Defenders of Wildlife Carnivore Conference. The Failure of Traditional Management Practices in Conserving Large Predators: The Cougar a Case Study. Rick A. Hopkins, Brett Dickson, and Brad McRae. St. Petersburg, Florida November 2006.
2007. Ecological Society of America Annual Meeting. Novel spatial tools for connectivity conservation: A case study using cougars in southern California. Rick A. Hopkins, Brett Dickson and Brad McRae. San Jose, California. August 2007.
2008. 9<sup>th</sup> Mountain Lion Workshop. Novel spatial tools for connectivity conservation: A case study using cougars in southern California. Rick A. Hopkins, Brett Dickson and Brad McRae. Sun Valley, Idaho. May 2008.
2009. Defenders of Wildlife Carnivore Conference. Invited Participant - Round Table Discussion: Mountain Lions, People and Policy: Improving our Prospects for Effective Conservation of a Keystone Predator. Denver, Colorado. November 2009.

**TESTIMONY AT STATE WILDLIFE COMMISSION MEETINGS OR STATE LEGISLATIVE HEARINGS.**

Dr. Hopkins has provided both written and oral testimony at state wildlife commission hearings and at Legislative Hearings in several western states. These include California, Oregon, Washington, Colorado, Wyoming and South Dakota. The purpose of these testimonies was to provide decision makers the best available scientific information regarding the biology and ecology of the cougar and to evaluate the ramifications of or effectiveness of proposed actions.



**BOARD MEMBER OF NON-PROFIT ORGANIZATION**

- Cougar Fund, Jackson, Wyoming. An organization dedicated to the preservation of the cougar in its present and historic range. Other board members include Jane Goodall, Marc Beckoff, Tom Mangelsen (Co-founder), Cara Blesley (Co-founder), Howard Buffett, Corinne E. Rutledge, Webb Blesley.

**SCIENTIFIC ADVISORY BOARDS**

- Department of Biological Sciences, San Jose State University.
- Predator Defense; an Oregon organization dedicated to the use of sound science in the management of mammalian predators.

- AOB9-1 The commenter’s summary of the draft EIR/EIS/EIS and belief that it is flawed and inadequate is noted. This comment summarizes comments addressed below.
- AOB9-2 The commenter states that the golf course design has been mischaracterized and inaccurately describes baseline conditions, including forest habitat and quarry areas. See Response to Comment AOB8-6 for a discussion of the quarry area and Master Response Section 3.3, “Biological Resources,” for a discussion of forest habitat and baseline conditions. See Master Response Section 3.2, “Land Use,” for a discussion of California Wildlife Habitat Relationship analysis.
- South Tahoe Public Utility District (STPUD) access roads are located primarily outside of the proposed golf course footprint but within an area to be exchanged into LVSRA and will continue to be maintained regularly as needed for use by STPUD and for recreation access. As described in Section 3.5, “Biological Resources,” of the draft EIR/EIS/EIS under existing conditions, trees were removed along the large meadow as part of the Riparian Hardwood Restoration Project because of meadow encroachment. This is consistent with ongoing State Parks’ management practices,
- AOB9-3 The commenter states that there are serious mapping errors. See Master Response Section 3.3, “Biological Resources,” and Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- AOB9-4 The commenter states that impacts on fens and springs are not adequately addressed. See Master Response Section 3.3, “Biological Resources,” and Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- AOB9-5 The commenter states that impacts on wildlife movement are not adequately addressed. See Master Response Section 3.3, “Biological Resources.”
- AOB9-6 The commenter’s belief that the draft EIR/EIS/EIS provides a misleading comparative evaluation of the alternatives is noted. This comment summarizes comments addressed above.

## Comment on Draft EIS for Upper Truckee River Project

Mike Frye [mike@ltva.org]

**Sent:** Tuesday, October 26, 2010 2:58 PM

**To:** Project, Upper Truckee

AOB-10

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October 20, 2010

Ms. Cyndie Walck  
CA State Parks and Rec, Sierra District  
P O Box 16,  
Tahoe City, CA 96145

Dear Ms. Walck:

This e-mail is to comment on the Draft EIS for the Upper Truckee River Project. As a full time resident and homeowner for over thirty years I am very concerned about the choice/decision made and the fate of the Lake Tahoe Golf Course.

There is a great deal at stake:

- 1) 168 jobs at Lake Tahoe Golf Course
- 2) \$6,000,000 in revenue-a major contributor to the viability of our community
- 3) \$880,000 in tax revenue to the state park system
- 4) The South Shore's busiest golf course and a source of recreation to residents and visitors alike

I am not just a business person or a person promoting tourism. I moved here for the out-door life style. This is my home. I met my wife here. My son was born here. I care deeply about the well being of our environment and I am concerned about the clarity of the Lake, but there is a "clean" means of achieving the goal of clarity and of retaining jobs, revenues and recreation. Alternative #2 of the Draft EIS for the Upper Truckee River Project. Please do not be swayed by the narrow, short sighted vision of special interests that do not represent the majority, the mainstream or what is good for our community.

Best regards,



Mike Frye  
Sales & Events Manager  
Lake Tahoe Visitors Authority  
169 Highway 50  
P.O. Box 5878  
Stateline, NV 89449

P (775) 588-5900 X309  
F (775) 588-1941  
mike@LTVA.org  
www.tahoosouth.com

AOB10-1

AOB10-1

The commenter's support for Alternative 2 and its economic, recreation, and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**California Regional Water Quality Control Board  
Lahontan Region**

**AOB-11**

Linda S. Adams  
Secretary for  
Environmental Protection

2501 Lake Tahoe Boulevard, South Lake Tahoe, California 96150  
(530) 542-5400 • Fax (530) 544-2271  
www.waterboards.ca.gov/lahontan

Arnold

NOV 15 2010

Cyndie Walck  
State of California Department of Parks and Recreation  
P.O. Box 16  
Tahoe City, CA 96145

**COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL  
IMPACT STATEMENT (EIR/EIS) FOR THE UPPER TRUCKEE RIVER RESTORATION  
AND GOLF COURSE RECONFIGURATION PROJECT, EL DORADO COUNTY**

California Water Quality Control Board, Lahontan Region (Water Board) staff have reviewed the subject document. We understand the California Department of Parks and Recreation (CDPR) proposes to restore eroding portions of the Upper Truckee River within the Lake Valley State Recreation Area to accommodate more natural geomorphic processes and floodplain function. Several project alternatives include relocating portions of the existing golf course.

The Water Board is a responsible agency pursuant to the California Environmental Quality Act (CEQA) for this plan. Water Board staff have reviewed the water quality elements of the draft EIR/EIS and have the following comments:

**Lake Tahoe TMDL Implementation**

The Lake Tahoe Total Maximum Daily Load Report identifies the pollutants responsible for Lake Tahoe's transparency decline, describes the relative magnitude of the pollutant sources, and provides a plan to reduce pollutants to restore lost transparency. According to the estimates prepared for the Lake Tahoe TMDL Report, stream bed and bank erosion accounts for approximately four percent of the basin-wide fine sediment particle load reaching Lake Tahoe.

As noted in the EIR/EIS, reducing fine sediment particle and nutrient loading from stream bed and bank erosion is an important part of the Lake Tahoe TMDL implementation plan. The Lake Tahoe TMDL Report notes that stream restoration actions are one of the most cost effective measures to reduce pollutant loading to Lake Tahoe.

Due to instability caused by historic and ongoing land disturbances, the portion of the Upper Truckee River in the project area has been identified as one of the largest controllable sources of stream bed and bank erosion. As such, Water Board staff supports CDPR's efforts to restore geomorphic function to this portion of the Upper Truckee River. Alternatives 1 and 4 will not achieve the stated project goals of improving geomorphic processes and enhancing riparian habitat and function. Although Alternative 4 attempts to

AOB11-1

***California Environmental Protection Agency***



address stream bank and bed erosion, similar efforts in the past have proven unsuccessful and unsustainable.

AOB11-1  
cont.

**Adaptive Management**

Alternatives 2, 3 and 5 would all implement process-based techniques to accomplish the CDPR's objective of re-establishing geomorphic function and riparian restoration. Although similar methods have been successfully implemented on other stream restoration projects, the CDPR should describe a monitoring program and an associated adaptive management program to identify specific success criteria, assessment methods, and proposed adaptive management actions to address unexpected changes in project conditions.

AOB11-2

**Washoe Meadows Hydrology, Geomorphology, and Water Quality**

The Environmental Setting discussions within section 3.3 Hydrology and Flooding and section 3.4 Geomorphology and Water Quality focuses on the Upper Truckee River, the adjacent riparian area, and the existing golf course. These discussions lack hydrology, geomorphology, and water quality information on the area west of the river where the golf course relocation would occur under Alternative 2. Consequently, the assessment of potential impacts to these hydrologic resources for Alternative 2 is incomplete.

AOB11-3

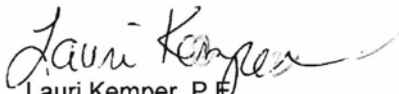
As noted in other portions of the EIR/EIS, there are numerous seeps, springs, and perennial flow paths within Washoe Meadows State Park. Because Alternative 2 could impact these areas, the EIR/EIS must provide a clear assessment of the surface and groundwater resources in Washoe Meadows State Park and evaluate potential hydrologic, geomorphic, and water quality impacts associated with project implementation.

**Golf Course Relocation**

The CDPR should also be aware that operational requirements for any golf course re-alignment may be different than those that apply to the existing Lake Tahoe Golf Course. Consistent with other golf course construction projects in our region, the operator of the relocated course will be required to conduct extensive surface and ground water monitoring and to develop and implement detailed irrigation and fertilizer management programs.

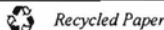
AOB11-4

Thank you for the opportunity to comment on the EIR/EIS. If you have any questions or comments regarding this matter please contact me at (530) 542-5436 or Robert Larsen, Environmental Scientist at (530) 542-5439.

  
Lauri Kemper, P.E.  
Assistant Executive Officer

BL/clhT: UTR.golf.EIR-EIS.comments.doc

***California Environmental Protection Agency***



AOB11-1

The comment expresses the support of Lahontan RWQCB staff for Alternatives 2, 3, and 5 as stream restoration actions similar to those identified by the Lake Tahoe TMDL report as a cost-effective measure to reduce pollutant loading to the lake. The comment expresses staff concerns that Alternatives 1 and 4 would not achieve all project goals and that Alternative 4 may not be successful in controlling streambed and bank erosion.

AOB11-2

This comment was addressed in the following mitigation measures:

- ▶ Mitigation Measure 3.4-7B (Alt. 2), “Adaptively Manage Potential Flood Damage in the Interim Period after Construction”;
- ▶ Mitigation Measure 3.16-10A, “Cumulative Geomorphology and Water Quality—Implement Alternative-Specific Measures to Minimize or Correct Temporary Water Quality Effects Following Construction”; and
- ▶ Mitigation Measure 3.16-10B, “Cumulative Geomorphology and Water Quality—Implement an Interim Adaptive Management Plan on the Upper Truckee River.”

With implementation of project-level Mitigation Measure 3.4-7B (Alt. 2), State Parks will develop and implement an adaptive management plan for the project reach. This plan will focus on potential short-term degradation of water quality that could result if unexpectedly large flood flows were to occur within the first 5 years after construction. The plan will identify specific data collection and monitoring protocols, and describe decision-making processes and authorities for corrective actions or activities. The focus of the performance criteria for the corrective actions will be to prevent initial flood damage or turbidity effects from becoming a persistent, recurring, or chronic source.

Cumulative Mitigation Measure 3.16-10A varies by project site/reach and alternative selected. Each project lead agency/sponsor will develop and implement these measures separately during detailed design development. The measures are alternative and site specific, and are designed to minimize or correct potential effects on water quality that could occur during a large flood (25-year recurrence or larger) within 5 years of construction. The performance criterion for the mitigation will be to minimize the risk of significant water quality impact(s) during the 5-year period after completion of construction. For example, some of the proposed alternatives will include longer revegetation/stabilization periods before reactivation of channel sections; other alternatives will include preproject removal of accumulated fines and organic matter in reactivated floodplains/channels; and some will involve monitoring and potentially replenishing coarse sediment to downstream reaches.

For cumulative Mitigation Measure 3.16-10B, the project proponents for all the restoration project reaches on the Upper Truckee River (i.e., California Tahoe Conservancy, State Parks, the U.S. Forest Service [USFS], and the City of South Lake Tahoe) currently participate in the Upper Truckee River Watershed Advisory Group (UTRWAG). This advisory group is a forum that facilitates discussion of issues important to the planning, implementation, and monitoring of SEZ and river improvement, enhancement, and restoration projects in the watershed. These agencies

also participate in a subcommittee of the UTRWAG that focuses on coordinated adaptive management (activities necessary for resource management of the various Upper Truckee River improvement projects). The agencies collaborate regarding potential activities or actions to be implemented in response to resource degradation, revisions to objectives, or monitoring in the various Upper Truckee River project areas. Specifically, they share and evaluate monitoring data, determine the degree to which implementation and monitoring is effective, identify potential problems and sources, make suggestions, and provide mutual feedback.

Because of the dynamic nature of river systems, it is not feasible to identify specific measures to address unexpected changes in project conditions. However, the project proponents will continue adaptive management, with a plan to prevent potential short-term water quality degradation that may result if unexpectedly large flood flows occur within the first 5 years after construction of each project.

The project proponent for each project reach will collect and evaluate monitoring data for its reach. The UTRWAG subcommittee will coordinate annual data review and field inspections for each project reach during the period of adjustment and initial flood vulnerability, and will develop recommendations for an adaptive management action. Potential actions could include changing objectives or monitoring; completing minor maintenance (e.g., additional revegetation or spot repairs); or taking corrective action to ameliorate a chronic or worsening trend, followed by continued monitoring to determine whether future action is needed. The adaptive management subcommittee will identify potential problems and determine the levels of monitoring or action needed to prevent the problems from becoming persistent, recurring, or chronic. This effort will make it easier to identify short-term degradation of surface water quality early on, and will foster remedial actions. Adaptive management will be in force for the interim period of channel adjustment and initial flood vulnerability (i.e., at least 5 years but no more than 10 years from the end of construction); this will be a period long enough to allow for expected natural channel adjustments.

AOB11-3

The commenter requests that additional setting information about hydrology, geomorphology, and water quality in the study area west of the existing river be included in Sections 3.3 and 3.4 of the draft EIR/EIS/EIS. The commenter states that the most detailed setting descriptions of the numerous seeps, springs, and perennial flow paths west of the river are contained within other sections of the draft EIR/EIS/EIS. Finally, the commenter concludes that the impact assessments in Sections 3.3 and 3.4 are incomplete relative to assessments for the areas west of the river.

The commenter is correct that some of the hydrologic features west of the river are described within the draft EIR/EIS/EIS chapters that evaluate them as biological resources. In addition, the setting within Section 3.3 includes maps that show the ephemeral drainages on the west side of the river, within Washoe Meadows SP (see Exhibit 3.3-13); the text indicates that there are seeps, springs, and ephemeral drainages. Although the information about these features in the setting is not extensive, data from all setting sections were considered during the impact analysis. Potential impacts on hydrology and flooding west of the river under Alternative 2 are included under several topics, and specific elements of proposed mitigation measures address areas west of the river, including the following:

- ▶ Impact 3.3-1 (Alt. 2) indicates that stormwater runoff impacts could occur to drainages within the subwatershed(s) on the west side of the river within Washoe Meadows SP. Mitigation Measure 3.3-1 (Alt. 2) requires that specific performance



standards be met within each subwatershed, within each existing natural drainage. The area where these standards must be met include swales, seeps, and creeks throughout the entire potential project area, not only the areas east of the river or with perennial water courses.

- ▶ Impact 3.3-2 (Alt. 2) indicates that increased peak flows could result within some subbasins on the site and considers the potential new stormwater pond on the west side of the river.
- ▶ Impact 3.3-4 (Alt. 2) discloses potential increases in flooding area or frequencies west of the river.
- ▶ Impact 3.3-5 (Alt. 2) discusses likely changes to groundwater recharge and/or levels west of the river resulting from a combination of modifying surface water features, vegetation, and irrigation and reconfiguring the elevation and location of the channel bed.

The commenter is correct that the setting discussion in Section 3.4 of the draft EIR/EIS/EIS presents little information specifically about geomorphology or water quality west of the river. However, little or no site-specific information is available about existing water quality conditions or channel geomorphology in this area. Despite the lack of quantitative information available about existing conditions, potential impacts on water quality west of the river under Alternative 2 are included under several topics. Specific elements of proposed mitigation measures address areas west of the river, including the following:

- ▶ Impact 3.4-1 (Alt. 2) identifies potential impacts on stream channels. The impact discussion focuses on perennial channels of all sizes, ranging from the unnamed stream within the existing golf course to the Upper Truckee River, but does not include specific impacts on stream channels west of the river. The concerns about channel erosion under this impact are appropriately limited to perennial channels. The potential indirect effects of Alternative 2 on erosion along ephemeral channels west of the river are addressed directly in terms of the potential hydrology or stormwater changes under Impact 3.3-1 (Alt. 2). Appropriate mitigation for that impact has been identified to prevent the indirect water quality effects.
- ▶ Impact 3.4-4 (Alt. 2) incorporates potential changes to geomorphic processes west of the river caused by overbank flooding as part of the total potential benefits of retaining fine sediment and nutrients.
- ▶ Impact 3.4-6 (Alt. 2) considers the potential short-term risks to water quality during construction that could occur west of the river as a component of the total adverse impact. Mitigation Measure 3.4-6 (Alt. 2) specifically includes measures that require consideration of groundwater and surface water flows within areas west of the river.
- ▶ Impact 3.4-8 (Alt. 2) specifies that portions of the long-term impact could occur on the west side of the river, within the existing Washoe Meadows SP. Mitigation Measure 3.4-8 (Alt. 2) requires particular features within the final stormwater system to protect natural drainages, surface water runoff, and shallow groundwater west of the river from golf course stormwater and associated pollutants.

The level of detail in the setting sections of Sections 3.3 and 3.4 of the draft EIR/EIS/EIS is general with respect to the surface and groundwater features west of the river;

however, it is not incomplete, merely limited to available information. Additionally, the impact analysis in Sections 3.3 and 3.4 does consider the presence, biologic functions, and potential erosion, sedimentation, flooding, and water quality effects of Alternative 2 on the existing seeps, springs, and drainages west of the river. See Master Response Section 3.3, “Biological Resources,” and Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for additional information related to the fens and springs. Refer to Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS for text revisions related to these topics.

AOB11-4

The comment states that operational requirements for the relocated golf course imposed by the Lahontan RWQCB would be consistent with requirements for construction and operation of other golf courses that mandate extensive surface and groundwater monitoring, as well as detailed management of irrigation and fertilizer. This is consistent with statements in the draft EIR/EIS/EIS (pages 3.4-57 and 3.4-63) that updates to the waste discharge permit issued by the Lahontan RWQCB may be needed for Alternatives 2 and 3 to strengthen requirements.



October 6, 2010

California State Parks and Recreation  
Sierra District  
P.O. Box 16  
Tahoe City, 96145

Dear Ms. Cyndie Walck,

The League to Save Lake Tahoe appreciates the opportunity to comment on the Upper Truckee River Restoration and Golf Course Reconfiguration Draft EIR/EIS. The efforts by California State Parks to restore a very important section of the Upper Truckee River are commendable.

The League supports the restoration of stream environment zones as well as the protection of raw undeveloped sensitive lands and forested uplands. These ecosystems provide important water quality benefits, ecological functions, and wildlife habitat. After thoroughly reviewing the different alternatives and their associated impacts, the League is strongly in support of Alternative 3 River Ecosystem Restoration with Reduced-Play Golf Course. Alternative 3 provides the best opportunity to restore the Upper Truckee River, while simultaneously conserving valuable forested and sensitive land.

Furthermore, the League is strongly opposed to Alternative 2 because of the environmental impacts of turning raw undeveloped forested land into a developed golf course. These impacts include effects on water quality, soils, vegetation, recreation, wildlife and cultural resources. Specifically, Alternative 2 will remove acres of forested area with impacts to vegetation and wildlife, build within the vicinity of sensitive lands, reduce access and area for low impact recreation, disturb currently undisturbed soils and have an impact to water quality through the use of fertilizers and irrigation.

AOB12-1

Below is a list of primary reasons why the League supports Alternative 3 and opposes Alternative 2.

- 1) Alternative 3 restores the Upper Truckee River without impacting large areas of additional raw land, whereas in Alternative 2 impacts a significant amount of raw land and increases the golf course footprint from 133 acres to 156 acres.
- 2) In Alternative 2, 45 acres of Jeffrey and Lodgepole would be converted to golf course. 1395 trees greater than 10 inches DBH will be removed in the golf course relocation. These trees will not be removed in Alternative 3 (p. 3.5-75).
- 3) In Alternative 3 the floodplain would be more fully restored than in Alternative 2 (p.2-71).

- 4) No new wells, water storage or drainage ponds will need to be constructed for Alternative 3, whereas in Alternative 2, a 1.6 acre manmade pond will be created for irrigation (p. 2-52).
- 5) Alternative 3 does not reduce access from the neighboring communities to Washoe Meadows State Park as is the case with Alternative 2 (pg. 3.2-14). In alternative 2 the combination of reduced access along with the decrease in forested land will cause an impact to recreation uses.
- 6) Golf courses are not allowed in Washoe State Park and are not considered to be consistent with the purpose of the Washoe Meadows State Park designation. In order to put a golf course within the Park, Alternative 2 will require a change in the boundaries so that the land is no longer considered State Park. Alternative 3 does not require a change in State Park designation (p. 3.2-15).
- 7) Alternative 3, unlike alternative 2, does not propose activity within the vicinity of a fen (Table 3.2-1). In Alternative 2 the building of a golf course adjacent to a large undisturbed fen will create disturbance of this sensitive habitat.
- 8) Alternative 3 will decrease a higher amount of SEZ coverage compared with Alternative 2.
- 9) Alternative 3 removes all golf course bridge crossings (p. 3.3-54) and adds not additional bridges compared to alternative 2 which replaces five small bridges with one larger bridge.
- 10) In Alternative 2, 89 new paved parking spaces would be developed (p. 2-55).
- 11) Only 10 acres of new sod would be laid in Alternative 3.
- 12) Alternative 3 uses less water than Alternatives 1 and 2.
- 13) Alternative 2 impacts cultural resources.

AOB12-1  
cont.

In light of the above reasons, the League is fully in support of Alternative 3 which clearly stands out as the preferred environmental alternative by restoring reaches of the Upper Truckee River, conserving raw forested land, and serving to assist in achieving mandated many environmental thresholds. The League strongly opposes Alternative 2 which will disturb significant amounts of raw undisturbed land and impact environmental standards.

If you have any questions or concerns please contact the League at 530-541-5388.

Thank you,

Nicole Gergans  
Environmental Program Advocate

AOB12-1

The commenter's support for Alternative 3 and opposition to Alternative 2 is noted. The commenter lists impacts associated with Alternative 2 but does not acknowledge that most of these impacts are also associated with Alternative 3. Most of the impacts have been mitigated under both alternatives, including impacts on water quality, soils, vegetation, recreation, wildlife, and cultural resources. See the following master responses:

- ▶ Master Response Section 3.2, "Land Use";
- ▶ Master Response Section 3.3, "Biological Resources";
- ▶ Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality";
- ▶ Master Response Section 3.5, "Recreation"; and
- ▶ Master Response Section 3.6, "Cultural Resources."



October 26, 2010

California State Parks and Recreation  
Sierra District  
P.O. Box 16  
Tahoe City, 96145

Dear Ms. Cyndie Walck,

The League to Save Lake Tahoe appreciates the opportunity to comment on the Upper Truckee River Restoration and Golf Course Reconfiguration Draft EIR/EIS. The efforts by California State Parks to restore a very important section of the Upper Truckee River are commendable.

The League supports the restoration of stream environment zones as well as the protection of raw undeveloped sensitive lands and forested uplands. These ecosystems provide important water quality benefits, ecological functions, and wildlife habitat. After thoroughly reviewing the different alternatives and their associated impacts, the League is strongly in support of Alternative 3 River Ecosystem Restoration with Reduced-Play Golf Course. Alternative 3 provides the best opportunity to restore the Upper Truckee River, while simultaneously conserving valuable forested and sensitive land.

Alternative 3 is the environmentally preferred alternative because it avoids the impacts that will be caused by Alternative 2. Specifically, Alternative 2 develops forested land with impacts to vegetation and wildlife, builds within the vicinity of sensitive lands, reduces access area for low impact recreation, disturbs currently undisturbed soils and has an impact to water quality through the use of fertilizers and irrigation.

AOB13-1

Below is a summary of primary reasons why the League supports Alternative 3 over Alternative 2.

- 1) Alternative 3 restores the Upper Truckee River without impacting large areas of additional undeveloped forested land, whereas Alternative 2 impacts a significant amount of undeveloped forested land and increases the golf course footprint from 133 acres to 156 acres.
- 2) In Alternative 3 the floodplain would be more fully restored than in Alternative 2 (p.2-71) working to help attain the water quality and soils thresholds
- 3) No new wells, water storage or drainage ponds will need to be constructed for Alternative 3, whereas in Alternative 2, a 1.6 acre manmade pond will be created for irrigation (p. 2-52).

- 4) Alternative 3 does not reduce access from the neighboring communities to Washoe Meadows State Park as is the case with Alternative 2 (pg. 3.2-14). In alternative 2 the combination of reduced access along with the decrease in forested land will cause an impact to recreation uses and the recreation threshold.
- 5) Golf courses are not allowed in Washoe State Park and are not considered to be consistent with the purpose of the Washoe Meadows State Park designation. In order to put a golf course within the Park, Alternative 2 will require a change in the boundaries so that the land is no longer considered State Park. Alternative 3 does not require a change in State Park designation (p. 3.2-15).
- 6) Alternative 3, unlike alternative 2, does not propose activity within the vicinity of a fen (Table 3.2-1). In Alternative 2 the building of a golf course adjacent to a large undisturbed fen will create disturbance of this sensitive habitat and impact the soils threshold.
- 7) Alternative 3 will decrease a higher amount of SEZ coverage compared with Alternative 2. Thereby, alternative 3 has a greater benefit in working towards the achievement of the soils thresholds.
- 8) Alternative 3 removes all golf course bridge crossings (p. 3.3-54) and does not add additional bridges compared to alternative 2 which replaces five small bridges with one larger bridge.
- 9) In Alternative 2, 89 new paved parking spaces would be developed (p. 2-55) which impacts the soils threshold.
- 10) Only 10 acres of new sod would be laid in Alternative 3.
- 11) Alternative 3 uses less water than Alternatives 1 and 2.
- 12) Alternative 2 impacts cultural resources.

AOB13-1  
cont.

In light of the above reasons, the League is fully in support of Alternative 3 which clearly stands out as the preferred environmental alternative by restoring reaches of the Upper Truckee River, conserving undeveloped forested land, and serving to assist in achieving mandated many environmental thresholds.

If you have any questions or concerns please contact the League at 530-541-5388.

Thank you,

Nicole Gergans  
Environmental Program Advocate

AOB13-1

The commenter's support for Alternative 3 and opposition to Alternative 2 is noted. The commenter lists impacts associated with Alternative 2 but does not acknowledge that most of these impacts are also associated with Alternative 3. Most of the impacts have been mitigated under both alternatives, including impacts on water quality, soils, vegetation, recreation, wildlife, and cultural resources. See the following master responses:

- ▶ Master Response Section 3.2, "Land Use";
- ▶ Master Response Section 3.3, "Biological Resources";
- ▶ Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality";
- ▶ Master Response Section 3.5, "Recreation"; and
- ▶ Master Response Section 3.6, "Cultural Resources."





November 15, 2010

California State Parks and Recreation  
Sierra District  
P.O. Box 16  
Tahoe City, 96145

Dear Ms. Cyndie Walck,

The League to Save Lake Tahoe appreciates the opportunity to comment on the Upper Truckee River Restoration and Golf Course Reconfiguration Draft EIR/EIS. The efforts by California State Parks to restore a very important section of the Upper Truckee River are commendable.

The League supports the restoration of stream environment zones as well as the protection of raw undeveloped sensitive lands and forested uplands. These ecosystems provide important water quality benefits, ecological functions, and wildlife habitat. After thoroughly reviewing the different alternatives and their associated impacts, the League is strongly in support of Alternative 3 River Ecosystem Restoration with Reduced-Play Golf Course. Alternative 3 provides the best opportunity to restore the Upper Truckee River, while simultaneously conserving valuable forested and sensitive land.

Alternative 3 is the environmentally preferred alternative because it avoids the impacts that will be caused by Alternative 2. Specifically, Alternative 2 develops forested land with impacts to vegetation and wildlife, builds within the vicinity of sensitive lands, reduces access area for low impact recreation, disturbs currently undisturbed soils and has an impact to water quality through the use of fertilizers and irrigation.

AOB14-1

Below is a summary of primary reasons why the League supports Alternative 3 over Alternative 2.

- 1) Alternative 3 restores the Upper Truckee River without impacting large areas of additional undeveloped forested land, whereas Alternative 2 impacts a significant amount of undeveloped forested land and increases the golf course footprint from 133 acres to 156 acres.
- 2) In Alternative 3 the floodplain would be more fully restored than in Alternative 2 (p.2-71) working to help attain the water quality and soils thresholds
- 3) No new wells, water storage or drainage ponds will need to be constructed for Alternative 3, whereas in Alternative 2, a 1.6 acre manmade pond will be created for irrigation (p. 2-52).
- 4) Alternative 3 does not reduce access from the neighboring communities to Washoe Meadows State Park as is the case with Alternative 2 (pg. 3.2-14). In alternative 2 the combination of

reduced access along with the decrease in forested land will cause an impact to recreation uses and the recreation threshold.

- 5) Golf courses are not allowed in Washoe State Park and are not considered to be consistent with the purpose of the Washoe Meadows State Park designation. In order to put a golf course within the Park, Alternative 2 will require a change in the boundaries so that the land is no longer considered State Park. Alternative 3 does not require a change in State Park designation (p. 3.2-15).
- 6) Alternative 3, unlike alternative 2, does not propose activity within the vicinity of a fen (Table 3.2-1). In Alternative 2 the building of a golf course adjacent to a large undisturbed fen will create disturbance of this sensitive habitat and impact the soils threshold.
- 7) Alternative 3 will decrease a higher amount of SEZ coverage compared with Alternative 2. Thereby, alternative 3 has a greater benefit in working towards the achievement of the soils thresholds.
- 8) Alternative 3 removes all golf course bridge crossings (p. 3.3-54) and does not add additional bridges compared to alternative 2 which replaces five small bridges with one larger bridge.
- 9) In Alternative 2, 89 new paved parking spaces would be developed (p. 2-55) which impacts the soils threshold.
- 10) Only 10 acres of new sod would be laid in Alternative 3.
- 11) Alternative 3 uses less water than Alternatives 1 and 2.
- 12) Alternative 2 impacts cultural resources.

AOB14-1  
cont.

In light of the above reasons, the League is fully in support of Alternative 3 which clearly stands out as the preferred environmental alternative by restoring reaches of the Upper Truckee River, conserving undeveloped forested land, and serving to assist in achieving mandated many environmental thresholds.

Furthermore, the League does not support Alternative 1, the No Project Alternative. This alternative will provide no restoration benefit and therefore would not provide progress towards achieving the environmental threshold standards.

If you have any questions or concerns please contact the League at 530-541-5388.

Thank you,

Nicole Gergans  
Environmental Program Advocate

AOB14-1

The commenter's support for Alternative 3 and opposition to Alternative 2 is noted. The commenter lists impacts associated with Alternative 2 but does not acknowledge that most of these impacts are also associated with Alternative 3. Most of the impacts have been mitigated under both alternatives, including impacts on water quality, soils, vegetation, recreation, wildlife, and cultural resources. See the following master responses:

- ▶ Master Response Section 3.2, "Land Use";
- ▶ Master Response Section 3.3, "Biological Resources";
- ▶ Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality";
- ▶ Master Response Section 3.5, "Recreation"; and
- ▶ Master Response Section 3.6, "Cultural Resources."



**LAKE TAHOE**  
VISITORS AUTHORITY  
SOUTH SHORE

AOB-15

October 7, 2010

The Board members of the Lake Tahoe Visitor’s Authority, after reviewing the draft EIR/EIS/EIS documents on the Upper Truckee River Restoration and Golf Course Reconfiguration Project and the stated goals of the project in the Executive Summary, do hereby state that,

- Whereas Alternative 2 best meets the outlined goals of the restoration project
  - Restoration of the Upper Truckee River to a functional state
  - Restoration of the surrounding streamside and meadow habitat
  - Preservation of a regulation-size golf course for high-quality outdoor public recreation
  - Preservation of the annual \$6,000,000 contribution to the local economy as a direct result of Lake Tahoe Golf Course operations
  - Preservation of 198 direct and indirect jobs as a result of Lake Tahoe Golf Course operations
  - Preservation of the annual \$880,000 to California State Parks from concessionaire fees as a direct result of Lake Tahoe Golf Course operations
- Whereas Alternative 2 is the best overall solution for the environment, for the economy of South Lake Tahoe, and for high-quality public outdoor recreation

AOB15-1

We strongly recommend that Alternative 2 be approved for implementation by the Tahoe Regional Planning Agency and by California State Parks.

On behalf of the Board,

Patrick Ronan  
Chair  
Lake Tahoe Visitors Authority

California Location: 3066 Lake Tahoe Boulevard  
Nevada Location: 169 Highway 50 / P.O. Box 5878

South Lake Tahoe, CA 96150  
Stateline, NV 89449-5878

530-544-5050 phone  
775-588-5900 phone

530-541-7121 fax  
775-588-1941 fax

**TahoeSouth.com**

AOB15-1

The commenter's support for Alternative 2 and its economic, recreation, and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



LAKE TAHOE  
VISITORS AUTHORITY  
SOUTH SHORE

AOB-16

October 29, 2010

The members of the Lake Tahoe Visitor’s Authority Marketing Committee, after reviewing the draft EIR/EIS/EIS documents on the Upper Truckee River Restoration and Golf Course Reconfiguration Project and the stated goals of the project in the Executive Summary, do hereby state that,

Whereas Alternative 2 best meets the outlined goals of the restoration project:

- Restoration of the Upper Truckee River to a functional state
- Restoration of the surrounding streamside and meadow habitat
- Preservation of a regulation-size golf course for high-quality outdoor public recreation
- Preservation of the annual \$6,000,000 contribution to the local economy as a direct result of Lake Tahoe Golf Course operations
- Preservation of 198 direct and indirect jobs as a result of Lake Tahoe Golf Course operations
- Preservation of the annual \$880,000 to California State Parks from concessionaire fees as a direct result of Lake Tahoe Golf Course operations

AOB16-1

And do hereby support Alternative 2 and recommend that the Tahoe Regional Planning Agency and California State Parks approve Alternative 2 for implementation.

Respectfully,

Mindi Befu  
Chair  
Lake Tahoe Visitors Authority Marketing Committee

California Location: 3066 Lake Tahoe Boulevard  
Nevada Location: 169 Highway 50 / P.O. Box 5878

South Lake Tahoe, CA 96150  
Stateline, NV 89449-5878

530-544-5050 phone  
775-588-5900 phone

530-541-7121 fax  
775-588-1941 fax

**TahoeSouth.com**

Letter  
AOB16  
Response

Lake Tahoe Visitors Authority, South Shore  
Mindi Befu, Chair—Lake Tahoe Visitors Authority Marketing Committee  
October 29, 2010

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AOB16-1

The commenter's support for Alternative 2 and its economic, recreation, and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Fwd: Upper Truckee River comment**

Sue Novasel [novasel@aol.com]

**Sent:** Wednesday, October 06, 2010 10:32 AM

**To:** Project, Upper Truckee

DATE: 10/06/2010  
To: Cyndie Walck, UTR project director  
cc: Theresa Avance, TRPA  
From: Sue Novasel, Chair of Meyers Community Roundtable Committee  
**RE: EIS/EIR/EIR Document, Upper Truckee River**  
Via: Email [utproject@parks.gov](mailto:utproject@parks.gov)

Thank you for accepting our comments on the draft EIS/EIR/EIR for the Upper Truckee River and Golf Course Reconfiguration Project.

My name is Sue Novasel and I have lived in the Meyers area for over 30 years. I am also the Chair of Meyers Community Roundtable Committee. Our Meyers group was presented an overview of the UTR project last month. Afterwards, members of the public were asked to comment on the project. There was no spoken opposition to the project and I believe that the following is a fair and accurate description of how our committee feels about the project.

We believe that Alternative 2, as outlined in the draft EIS document, will bring about the best results for the things we care about: the local community and the local environment.

As far as the benefits of the proposed Alternative 2 to the community, here are some of the reasons we see that it will be **best for the community**:

- Keeps jobs: Many people depend on the golf course to make their living. We read that over 75 jobs come out of the golf course. If we lose the golf course, it would be very challenging for these people to find jobs in this economy.
- Brings in tourist dollars: The Lake Tahoe Golf Course as well as all the other recreational access and amenities in the area (both summer and winter) are also major contributors to our way of life here. Many families earn their livings, in the South Lake/Meyers area from the tourist economy. We read that over \$6M is generated each year from visitors who come to our area to use the golf course. We would all feel the hit if this amenity went away. Families would move, school enrollment would go down, our community would suffer.

Here is why we think Alternative 2 is the **best option for the environment**:

- Alternative 2 maximizes the restoration benefits to the river while maintaining the economic engine of the area—the golf course.
- Alternative 2 seems like a better long-term solution to the river erosion issue than Alternative 4 (rip rap) which will only hold for a short time and look really bad.
- Alternative 2 could have a dramatic impact on lowering the run-off of sediment getting into Lake Tahoe by bringing back the natural curves in the river AND repairing the meadows along the bank.
- We also like 2 because it adds a buffer between the river and the golf course.

To us, the obvious win/win alternative is number 2.  
Thank you,

Sue Novasel  
Chair, Meyers Community Roundtable Committee  
3080 Elf Lane  
South Lake Tahoe, CA 96150

AOB17-1



AOB17-1

The commenter's support for Alternative 2 and its economic, recreation, and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Truckee River Restoration and Golf Course Reconfiguration Project  
DEIR/DEIS/DEIS**

AOB-18

Gary Midkiff [gary@midkiffandassoc.com]

**Sent:** Tuesday, October 26, 2010 4:08 PM

**To:** Project, Upper Truckee

I am writing to support alternative #2 of the Draft Environmental Analysis which provides for restoration of the Truckee River through the golf course site and reconstruction of the 9 holes across the river. The Truckee River and the Lake Tahoe Golf Course are both important resources to the South Tahoe area and State of California State Park System. Restoration of the river through the golf course is an important water quality and environmental element, while the golf course is a major recreational resource and income producer to the CA State Parks System.

TRPA's Recreation Threshold is, according to the TRPA Compact, of equal importance to the future of the Basin. As TRPA, and the Courts, have found in the past, no single threshold can be held above another. Although many people would argue that there are cases where there should be priorities among the adopted Environmental Threshold Carrying Capacities, TRPA has repeatedly found that not to the possible.

I urge the certification of the EIS and approval of Alternative #2.

**Gary D. Midkiff**  
Principal

**Midkiff & Associates Inc.**  
O: (775) 588-1090  
F: (775) 588-1091  
gary@midkiffandassoc.com

AOB18-1

AOB18-1

The commenter's support for Alternative 2 and its economic, recreation, and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

AOB-19

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

**NATIVE AMERICAN HERITAGE COMMISSION**

915 CAPITOL MALL, ROOM 364  
SACRAMENTO, CA 95814  
(916) 653-4082  
(916) 657-5390 - Fax



September 2, 2010

Cyndie Walck  
California Department of Parks and Recreation Sierra District  
P.O. Box 16  
Tahoe City, CA 96145

RE: SCH#2006082150 Upper Truckee River Restoration and Gold Course Reconfiguration Project EIR/EIS: El Dorado County.

Dear Ms. Walck:

The Native American Heritage Commission has reviewed the Notice of Completion (NOC) regarding the above referenced project. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA guidelines 15064(b)). To adequately comply with this provision and mitigate project-related impacts on archeological resources, the Commission recommends the following actions be required:

- ✓ Contact the appropriate Information Center for a record search to determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **Sacred Lands File check completed, no sites indicated.**
  - A list of appropriate Native American Contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, CEQA §15064.5(e), and Public Resources Code §5097.98 mandates the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

AOB19-1

AOB19-2

AOB19-3

AOB19-4

Sincerely,

Katy Sanchez  
Program Analyst  
(916) 653-4040

CC: State Clearinghouse

**Native American Contact List**  
El Dorado County  
September 1, 2010

Washoe Tribe of Nevada and California  
Waldo Walker, Chairperson  
919 Highway 395 South      Washoe  
Gardnerville , NV 89410  
waldo.walker@washoetribe.  
775-265-4191  
775-265-6240 Fax

Washoe Tribe of Nevada and California THPO  
Darrel Cruz, Cultural Resources Coordinator  
919 Highway 395 South      Washoe  
Gardnerville , NV 89410  
**darrel.cruz@washoetribe.**  
(775) 265-4191 ext 1212  
(775) 546-3421 - cell  
(775) 265-2254 FAX

April Wallace Moore  
19630 Placer Hills Road      Nisenan - So Maidu  
Colfax , CA 95713      Konkow  
530-637-4279      Washoe

**This list is current only as of the date of this document.**

**Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.**

**This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH# 2006082150 Upper Truckee River Restoration and Gold Course Reconfiguration Project EIR/EIS: El Dorado County.**

- AOB19-1            The commenter requests that State Parks contact the appropriate information center for a record search. See Master Response Section 3.6, "Cultural Resources."
- AOB19-2            The commenter requests that an archaeological survey report be prepared. See Master Response Section 3.6, "Cultural Resources."
- AOB19-3            The commenter requests that the Native American Heritage Commission be contacted. See Master Response Section 3.6, "Cultural Resources."
- AOB19-4            The commenter states that lack of surface evidence of archaeological resources does not preclude their subsurface existence. See Master Response Section 3.6, "Cultural Resources."



# STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Jim Gibbons, Governor

Leo M. Drozdoff, P.E., Acting Director

Colleen Cripps, Ph.D., Acting Administrator

AOB-20

November 4, 2010

Mr. Mike Elam  
Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, NV 89449-5310

Dear Mr. Elam,

This letter is to provide comments regarding the Upper Truckee River Restoration and Golf Course Reconfiguration Project Draft Environmental Report/Environmental Impact Statement/Environmental Impact Statement (Draft EIR/EIS/EIS). As the alternate representative to the Advisory Planning Commission, I was asked to do so.

As you are aware, the Lake Tahoe TMDL indicates the Upper Truckee River as the greatest contributor of fine sediment particle loads within the stream channel erosion source category. Moreover, the Pollutant Reduction Opportunity (PRO) analysis determined that stream restoration/rehabilitation are cost-effective actions capable of achieving significant load reductions relative to the source category loading rates. Therefore, restoration/rehabilitation of the Upper Truckee River is a relatively small, but significant component of the TMDL Recommended Implementation Strategy.

A reasonable range of alternatives for restoration of the river have been included in the Draft EIR/EIS/EIS. However, I would offer the following input with respect to two areas of the technical analysis presented in the report. The first is to recommend inclusion of a discussion of fertilizer practices on the golf course and associated nutrient loading estimates for each alternative. Nutrients are important controls not only on pelagic lake clarity but also nearshore and stream condition. Furthermore, the Final EIR/EIS/EIS should attempt to answer the following questions. Would re-establishment of hydrologic function and re-connection of the channel with floodplain increase or reduce nutrient loads? Will a fertilizer management plan be prepared and implemented on the golf course in order to minimize nutrient loading?

AOB20-1

While the issue of climate change was addressed in the report, the analysis was limited to impacts associated with emissions. An analysis with respect to impacts associated with consumptive water use was absent. The high consumptive use of water by golf courses warrants inclusion of this topic in the analysis. This need is furthermore emphasized in light of the TMDL findings associated with potential future climate change impacts. For this investigation, a range of published results from 84 different climate and hydrology model simulations for different emissions and environmental sensitivities were compiled. The central projection of predicted effects on precipitation and temperature through the year 2050 was a

AOB20-2

decrease by approximately 10% and increase by 2°C. It is important to discuss the implications of these predictions relative to the various EIR/EIS/EIS alternatives; how will each effect on water quantity in the drier climate that is predicted to occur? Will any of the alternatives exacerbate the problem or are there mitigation measures that should be taken to ensure they do not?

AOB20-2  
cont.

Related to both these points above, I would like to highlight a study conducted several years ago at Village Green located in Incline Village, NV (Beck, 2007). Village Green ballfield is a high use turf surface utilized by the local community for recreational sports. A cooperative agreement between researchers and the ballfield managers allowed the implementation and detailed monitoring of a variety of alternative management strategies in an effort to reduce the impacts of the turf surface to downstream water quality. The project included detailed surface water and groundwater instrumentation, maintenance and monitoring over several years to evaluate the water quality benefits of the elimination of phosphorus-containing fertilizer applications on the ballfields. Furthermore, a water reuse system was installed during the summer of 2006 which served as the sole source of fertilizer and/or soil amendments applied to a specific zone of the ballfields. Site observations included: (1) a reduction of nutrient loading to the groundwater and adjacent stream with little effect on the turf management practices or quality of the turf surface; (2) decreased consumptive water use. This led to the conclusion that implementation of highly sophisticated fertilizer management strategies on turf surfaces can significantly reduce contributions from anthropogenic fertilizer to the annual N& P budgets in Lake Tahoe. Moreover, the preliminary findings suggest that the application of automated reuse systems connected to adjacent wet basins and golf courses could reduce consumptive water use as well as annual fertilization needs. For the alternatives that include realignment of the golf course, NDEP encourages the inclusion of such practices as a mitigation measure for fertilizer and/or consumptive water use impacts identified.

AOB20-3

Thanks you for this opportunity to provide comments. Should you have any questions or need clarification, please contact me at 775.687.9450 or [jkuch@ndep.nv.gov](mailto:jkuch@ndep.nv.gov).

Sincerely,



Jason Kuchnicki

Cc: Kathy Sertic, NDEP  
Allen Biaggi, Chair TRPA Governing Board  
Lauri Kemper, Lahontan Water Board

Reference Cited

Beck, Nicole G. 2007. Water Quality Investigations of a Fertilized Turf Surface in the Lake Tahoe Basin (2002-2006). Prepared for Nevada Tahoe Conservation District, May 2007.



- AOB20-1            The commenter requests that the final EIR/EIS/EIS quantify estimates of nutrient loading related to fertilizer use on the golf course and relative changes in nutrient loads under each alternative. The commenter requests clarification about whether a fertilizer management plan would be prepared to minimize nutrient loading. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- AOB20-2            The commenter requests that climate change implications regarding consumptive water use be incorporated in the final EIR/EIS/EIS. The commenter incorrectly concludes that the mandatory evaluation of emissions was the only analysis of climate change impacts presented in the draft EIR/EIS/EIS. Anticipated region-specific climate change effects on hydrology were proactively included as part of the setting information (pages 3.3-10 to 3.3-13) and considered in the evaluation of alternatives in Section 3.16, “Cumulative Impacts.” This consideration included potential direct and indirect effects of potential climate change on hydrology, runoff, and river response.
- The commenter is correct that conditions under climate change may increase water demand, reduce the availability of surface water, or both, thus adversely affecting the overall water supply. However, the effects would be consistent under all alternatives, including the baseline. Therefore, the quantification and comparison of water demand under each alternative in the draft EIR/EIS/EIS (and as clarified and expanded in Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality”) also represents the comparison of each alternative relative to climate change effects on water supply.
- AOB20-3            The commenter recommends a potential method of sophisticated fertilizer management (eliminating fertilizer that contains phosphorous) and a water reuse system as an approach to mitigation for alternatives that involve realigning the golf course (e.g., Alternatives 2 and 3). The referenced water reuse approach could be incorporated by State Parks in its implementation of Mitigation Measure 3.4-8 (Alt. 2), but would not be the only means to achieve the performance goal(s) of the measure or meet potential regulatory requirements to be imposed by the Lahontan RWQCB. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for additional discussion of water use.

from the river. In either case, there is a strong indication that ground water can end up in the river, and thus end up in Lake Tahoe.

Of even greater significance are the highly soluble nutrients from golf course fertilizers that end up in Lake Tahoe, contributing to eutrophication problems.

According to information (draft EIR page 2-34) in the EIR highly soluble fertilizer materials are applied to the golf course in May and November. No specific data is presented in the EIR noting the actual amount or type of fertilizer materials that will (are) being used. Given the size of the golf course, the golf course management literature indicates that over 1000 lbs. of highly soluble nutrients will be applied annually given best management practices for golf courses. **How many pounds of the actual soluble nutrients, specially nitrogen and phosphorus compounds, will get into the ground or surface water and then into the river and the lake? What is the environmental impact of these nutrients entering the ecosystem? What is the mitigation proposed to offset these impacts?**

AOB21-3  
cont.

Please do not hesitate to contact me if you require any additional information or have questions.

Sincerely,

David Katz  
Project Manager

temperatures, reduced habitat for cover, increased susceptibility to predators and disease, stranding of young fish, and other impacts. **This environmental impact is not adequately addressed in the EIR. Adequate mitigation for this impact is not provided in the EIR.**

The EIR notes that a structural diversion using an armored outfall from the river will be used to divert water into artificial ponds for irrigation purposes. In addition, the EIR notes that a submersible pump would also be used to divert water from the river. **No quantitative data is presented for these proposed diversions, thus making it impossible to determine adverse environmental impact on fish habitat and other fishery related factors such as migration or spawning use by fish. No mitigation measures are provided to offset the impacts of these environmental impacts. This environmental impact is not adequately addressed in the EIR.**

AOB21-1  
cont.

2. The EIR states:

"IMPACT 3.3-6 (Alt. 2)

**Long-Term Increase in Irrigation-Water Demand.** *Implementing Alternative 2 would directly modify the locations and total acreage of specific irrigated land uses within the study area. The physical and operational irrigation system would be expanded and modified. The net effect of the overall increase in the golf course footprint, reduction of intensively managed areas, and improved irrigation system would be to hold demand in the study area to a level similar to existing conditions. This impact would be less than significant."*

The above Impact analysis holds that impact would be "less than significant". This assumption is based on the fact that the probable impact would be less because irrigation water demand would be at levels similar to existing conditions. This finding in the EIR is irrelevant, as environmental impacts will occur under Alt. 2, which will occur in a setting of greatly changed physical conditions regardless of the level of previous environmental impact under existing conditions. To be perfectly clear, regardless of the level of impact in existing conditions, there will be environmental impact in the proposed condition, thus it must be addressed specifically, not just in comparison to existing conditions. **This environmental impact is not adequately addressed in the EIR.**

AOB21-2

#### **GROUNDWATER AND NUTRIENTS:**

1. The proposed river restoration and golf course re-development would occur at upstream end of the flat glacial valley of the Upper Truckee River as shown in the EIR. These types of flat mountain meadows intersected by riparian corridors found in Sierra lake basins have relatively shallow ground water levels. The technical literature clearly documents that river seepage (losses to the aquifer) and or ground water drainage (losses to the river) may be affected by ground water pumping and natural variations in aquifer water level. When the aquifer water level is near land surface, such as a result of irrigation, and the river level is low due to in-cutting caused by stream disturbance, then water moves from the ground water aquifer into the river. Activities or events that result in a lowering of the water table, such as ground water pumping, induce more seepage

AOB21-3

from the river. In either case, there is a strong indication that ground water can end up in the river, and thus end up in Lake Tahoe.

Of even greater significance are the highly soluble nutrients from golf course fertilizers that end up in Lake Tahoe, contributing to eutrophication problems.

According to information (draft EIR page 2-34) in the EIR highly soluble fertilizer materials are applied to the golf course in May and November. No specific data is presented in the EIR noting the actual amount or type of fertilizer materials that will (are) being used. Given the size of the golf course, the golf course management literature indicates that over 1000 lbs. of highly soluble nutrients will be applied annually given best management practices for golf courses. **How many pounds of the actual soluble nutrients, specially nitrogen and phosphorus compounds, will get into the ground or surface water and then into the river and the lake? What is the environmental impact of these nutrients entering the ecosystem? What is the mitigation proposed to offset these impacts?**

AOB21-3  
cont.

Please do not hesitate to contact me if you require any additional information or have questions.

Sincerely,

David Katz  
Project Manager

AOB21-1

The commenter is concerned that the draft EIR/EIS/EIS did not adequately identify water use and the impacts of diverting surface water and/or pumping groundwater, and that it did not propose effective mitigation. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”

The commenter is concerned that the draft EIR/EIS/EIS did not adequately evaluate either the effects on fish of surface water diversions or other related aquatic impacts. As stated in Section 3.5, “Biological Resources,” of the draft EIR/EIS/EIS, project construction activities could intermittently increase turbidity and downstream sedimentation and could release and expose construction-related contaminants. These potential effects would be short term and temporary. Such exposure could reduce or adversely affect aquatic habitat and populations, including salmonids and other native aquatic species. The alternatives include a suite of measures, including BMPs, that would minimize this potential effect.

Construction would include dewatering activities that would result in the temporary loss of aquatic habitat. Fish and macroinvertebrates could become stranded during dewatering activities, and habitat could dry out or predation by birds or mammals could occur; or the organisms could be injured or killed by heavy equipment during site access, preparation, or construction activities. However, in the short term, implementing the alternatives could result in adverse effects on aquatic habitats. This impact would be significant. The following mitigation measures would be implemented:

- ▶ Mitigation Measure 3.5-1A, “Prepare and Implement Effective Site Management Plans”;
- ▶ Mitigation Measure 3.5-1B, “Implement Preconstruction Surveys for Western Pearlshell Mussels”;
- ▶ Mitigation Measure 3.5-1C, “Develop and Implement Native-Fish and Mussel Capture and Translocation Plan”;
- ▶ Mitigation Measure 3.5-1D, “Limit Potential Localized Channel Erosion in the Upper Truckee River and Tributary Creeks”;
- ▶ Mitigation Measure 3.5-1E, “Provide Bed and Bank Stabilization Measures at and Immediately Upstream and Downstream of Bridge Removal Sites”;
- ▶ Mitigation Measure 3.5-1F, “Ensure Bed and Bank Stability Downstream of the Treated Reaches”;
- ▶ Mitigation Measure 3.5-1G, “Ensure Bed and Bank Stability in the Lower Reaches of the Two Tributary Creeks”; and
- ▶ Mitigation Measure 3.5-1H, “Monitor and Supplement Coarse-Sediment Delivery Downstream and Monitor Instream Habitat Conditions.”

With implementation of these mitigation measures, impacts on fisheries and other aquatic resources would be less than significant.

AOB21-2

The commenter disagrees with the conclusion in the draft EIR/EIS/EIS that Impact 3.3-6 (Alt. 2) would be less than significant, even if demand for irrigation water under Alternative 2 would be similar to or less than demand under existing conditions. However, the commenter is incorrect in concluding that the impact conclusion cannot be made in comparison to existing conditions, which does establish the baseline for impact analysis (State CEQA Guidelines, Sections 15229 and 15125).

A primary purpose of an EIR/EIS/EIS is to inform decision-makers and the public about the potential environmental impacts of a project. A project's impacts are evaluated based on the direct, and the reasonably foreseeable indirect, physical changes in the environment that the project may cause (either on a project-specific basis or in a cumulative context). The setting or environmental baseline provides the starting point for that analysis. The current "baseline" conditions are a reflection and culmination of both historical and existing and ongoing activities that affect a specific resource; the true baseline condition is often a dynamic range of conditions.

For clarification of the quantities of water demand under existing conditions and each alternative, see Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

AOB21-3

The commenter is concerned about the effects of pumping groundwater on the shallow water table and interaction with surface water in the river. The commenter is correct that when the river's water surface is low and surrounded by saturated soils and/or aquifers at higher elevations, groundwater would flow toward the river. The commenter is correct in noting that the existing, incised river channel would experience more groundwater discharge from saturated soils on the surrounding land than would a higher elevation (e.g., restored) riverbed, as under Alternative 2, 3, or 5. Therefore, these action alternatives would be beneficial relative to existing conditions or Alternatives 1 and 4.

The commenter is concerned that groundwater pumping for the golf course's water supply would induce seepage from the river or add more groundwater to the river and Lake Tahoe. The commenter requests that the EIR/EIS/EIS quantify use of soluble fertilizer materials, provide additional discussion of the potential impact of nutrients entering the ecosystem, and mitigate the impact. For information on groundwater, fertilizer, and other chemical uses, see Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

AOB-22

**Support for Alternative 2**

Jerry M. Bindel [Jerry.Bindel@astonhotels.com]

**Sent:** Friday, October 29, 2010 3:06 PM

**To:** Project, Upper Truckee

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Dear Ms. Walck,

The South Lake Tahoe Lodging Association and Tourism Improvement District would like to endorse and support Alternative 2 for the Upper Truckee River Restoration Project. Alternative 2 provides the environmental benefits of restoring the river to its natural path, and also keeps the vital golf course in a viable 18-hole option. Any shortening of the golf course to 9-holes, or any elimination of the course, will have a detrimental effect of the South Lake Tahoe community. Many jobs will be lost, much-needed revenues for the City and State Parks will be lost, and tourism will be hurt tremendously.

AOB22-1

Thank you and please contact me with any questions.

**Jerry Bindel**  
**Chairman**  
**South Lake Tahoe Tourism Improvement District**  
**South Lake Tahoe Lodging Association**

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AOB22-1

The commenter's support for Alternative 2 and its environmental, economic, and recreation value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



## Comment on Draft EIS for Upper Truckee River Project

Kirstin Cattell [kcattell.st@boothcreek.com]

**Sent:** Wednesday, October 06, 2010 3:30 PM

**To:** Project, Upper Truckee

AOB-23

I am writing to express my support of Alternative 2 River Ecosystem Restoration with Reconfigured 18-hole Regulation Golf Course. As a 10 year resident of South Lake Tahoe, I am regularly enjoying the outdoors around the South shore in all four seasons. Certainly, I want our community to do whatever it can to maintain the clarity of Lake Tahoe – particularly righting the wrongs made during the development boom of the 1960s era. With the Upper Truckee being the main tributary flowing into Lake Tahoe, I think it is vital that we address the issue of sediment in this river in particular. It is nice to see real progress being made.

I also believe that it is in South Lake Tahoe's best economic interest to keep a viable 18-hole golf course operating. There is already an executive-style course in Meyers (we do not need another reduced play option as outlined in Alternative 3) and not everyone can afford to play Edgewood. If South Lake Tahoe loses the only full length, affordable 18-hole course it has, we will lose scores of casual golfers to the North shore, with its abundance of affordable 18-hole resort courses. These casual golfers spend money on room nights, food, and entertainment in town in addition to their day of golf. To lose this source of income during South Lake Tahoe's busiest revenue-generating season would be short-sighted and detrimental to the health of the local economy.

I also do not believe that South Lake Tahoe needs any more State Park land, as described in Alternative 5 River Ecosystem Restoration with Decommissioned Golf Course. There is plenty of park land in and around South Lake Tahoe for those who want a managed outdoor experience. And if "maintaining the unit in perpetuity as an ecosystem restoration area with no public access or outdoor recreation would not be feasible", I see no real benefit to the community or the river. Better to fix the erosion issue and continue to allow golfers access to the land than turn it into some kind of community green space with no real active purpose.

Thank you for the opportunity to offer feedback.

Kirstin A. Cattell  
Marketing & Communications Manager  
Sierra-at-Tahoe® and Northstar-at-Tahoe™ Resorts  
530.543.3132  
[www.sierraattahoe.com](http://www.sierraattahoe.com)  
[www.northstarattahoe.com](http://www.northstarattahoe.com)

AOB23-1

AOB23-1

The commenter's support for Alternative 2 and its environmental, economic, and recreation value is noted. The commenter's opposition to Alternative 5 is also noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

AOB-24



MOTHER LODE CHAPTER  
801 K STREET, SUITE 2700  
SACRAMENTO, CA 95814  
TEL. (916) 557-1100 EXT. 119 FAX: (916) 557-9669  
info@mlc.sierraclub.org -  
www.motherlode.sierraclub.org

November 15, 2010

Ms. Cyndie Walck  
California State Parks and Recreation  
Sierra District  
PO Box 16  
Tahoe City, CA 96145

Dear Ms. Walck:

Attached please find the joint comments of the Tahoe Area Sierra Club and the Mother Lode Chapter of the Sierra Club on the Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS)/Environmental Impact Statement (EIS) on the Upper Truckee River Restoration and Golf Course Reconfiguration Project.

The Sierra Club has been working since 1892 to protect communities, wild places, and the planet itself. It is the oldest, largest, and most influential grassroots environmental organization in the United States. Founder John Muir appears on the back of the California quarter.

The Tahoe Area Sierra Club is a group of the Mother Lode (California) and the Toiyabe (Nevada) chapters of the Sierra Club. TASC has 600+ members in the Lake Tahoe Area.

The Mother Lode Chapter represents 16,500 members of 11 groups in 24 counties of northern and central California.

Respectfully,

*Bob Anderson*

Bob Anderson  
Executive Committee  
Tahoe Area Sierra Club

*Terry Davis*

Terry Davis  
Conservation Program Coordinator  
Mother Lode Chapter, Sierra Club

November 15, 2010

## Joint Comments

Tahoe Area Sierra Club  
and the  
Mother Lode Chapter of the Sierra Club  
on the

Draft Environmental Impact Report (EIR)/Environmental Impact Statement (EIS)/Environmental Impact Statement (EIS) on the Upper Truckee River Restoration and Golf Course Reconfiguration Project.

In these comments we address:

- separating the issues of river restoration and golf reconfiguration,
- legal issues,
- TRPA's responsibility to attain and maintain thresholds,
- comparative benefits of Alternatives 2 and 3,
- the flawed economic feasibility report,
- access to the Upper Truckee River in Washoe Meadows State Park,
- water quality,
- removal of forest habitat,
- threats to wetlands and fens, and
- State Parks' duty to disturbed lands.

We conclude: Only Alternatives 3 and 5 can lead to the expeditious restoration of the river. Alternative 5 is the best environmentally. Alternative 3 is the best balance of the interests. Alternative 2 is legally questionable. Therefore, the Tahoe Area Sierra Club strongly opposes Alternative 2 and supports Alternatives 3 and 5.

### **River Restoration and Golf Course Reconfiguration should be separated.**

This project has two elements: river restoration and golf. They should be separated.

The TASC unequivocally supports river restoration. A healthy, naturally functioning Upper Truckee River would be good in its own right, good for Washoe Meadows State Park and its users, and good for the clarity of Lake Tahoe.

River restoration will require changes to golf because the golf course encroaches on the river. Lake Valley State Recreation Area (the golf course) has a general plan, as well as a river management plan. We support those plans. They call for river restoration and reduction in the area of the golf course. State Parks should implement those plans.

AOB24-1

**Alternative 2 is inconsistent with State Parks' mission, regulations and California state statutes and case law.**

Alternative 2 doesn't comport with the mission of State Parks, the settlement agreement and statute leading to the acquisition of Washoe Meadows State Park, the adopted purpose of the Park,<sup>1</sup> and regulations that preclude the permanent commitment of Park resources in the absence of a general plan.

Washoe Meadows State Park does not have a general plan. Under state regulations, it is impermissible to permanently commit the resources of a state park unit without a general plan.

Building a golf course and a bridge permanently commit resources of the Park. A general plan for the park must be completed before any proposal to build the golf course or any other use of the park. Proceeding on the Alternative 2 track will delay restoration of the river. Alternative 3 can be pursued for the most expeditious river restoration and the best opportunity to contribute to achievement of thresholds. After a general planning process for the park occurs, if the results embrace expanded golf, then it can proceed legally.

AOB24-2

**TRPA's duty is threshold achievement.**

TRPA's responsibilities are achieving a broad range of thresholds, not golf, not the economics or politics of golf, or State Parks' budget problems.

The project will affect TRPA thresholds, many of which are currently out of attainment and which will be further harmed by Alternative 2, e.g., water quality, air quality vegetation/forestry, and SEZs. TRPA should require a thorough environmental analysis of how the alternatives would affect TRPA thresholds, (e.g., what are the impacts of the expanded fertilizer use in Alternative 2 on nitrogen and phosphorous levels?), then rank the alternatives according to their environmental impact, i.e., their pursuit of TRPA's thresholds.

AOB24-3

As described in the EIR, Alternative 5, full river restoration with golf course removal and meadow restoration, is the best alternative.

The next best environmental alternative is Alternative 3, full river restoration with golf reduced on the east side of the river.

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<sup>1</sup> The purpose of Washoe Meadows State Park, in El Dorado County, is to preserve and protect a wet meadow area associated with the Angora Creek and the upper Truckee River at the southwestern side of the Lake Tahoe basin. The unit's associated forest areas sustain Jeffery pine and an exceptionally large specimen of lodgepole pine. The unit contains fourteen Native American occupancy sites and remnants of an historic dairy, and is contiguous to other public lands important for their open space values and recreational uses.

California State Parks will preserve, protect, restore, interpret and manage the unit's natural, cultural, and aesthetic resources, features and values, making them available to the public for their educational, inspirational and recreational benefits.

**Alternative 3 is superior to Alternative 2.**

On the merits, Alternative 3 is superior to Alternative 2. Here are some of the reasons (some of which related directly to TRPA thresholds):

1. Alternative 2 would decrease plant structure and diversity, converting 45 acres of forest to golf.
2. Alternative 2 would threaten uncommon plant communities—wetlands and fens.
3. Alternative 2 would impact sensitive species such as the Sand Lily (*Leucocrinum montanum*).
4. Alternative 2 would threaten wildlife species of special interest, such as the northern goshawk, which is specifically included in TRPA's threshold requirements.
5. Alternative 3 will achieve adequate revenues from golf, one of the goals stated in the EIR.
6. Alternative 2 would preclude much of Washoe Meadows State Park from fulfilling the vision of the settlement agreement and legislation that resulted in the acquisition of the Park. Alternative 3 would preserve the opportunity for Washoe Meadows State Park to be a park of the kind that complements the finest state park system in the country.
7. Drainages in the study area run downslope, roughly perpendicular to the river. The golf course of Alternative 2 would cross them. The EIR underestimates the impacts golf course construction and operation would have on the hydrology of the Park, especially its wetlands and fens.
8. In Alternative 2, golf would parallel the river on one side or the other for well over a mile, severely limiting access to the river corridor by Park users.
9. Fish habitat would be improved under both Alternative 2 and 3, but the fishing experience would be poor in Alternative 2 because of the proximity of so much golf course to the river.
10. The impact on water quality would be less under Alternative 3 than Alternative 2 because less area would be managed monoculture grasses, which require pesticides, fertilizers and maintenance activities (e.g. mowing) which pollute water and air and generate noise.
11. The golf course of Alternative 2 would generate noise from golf play and golf course maintenance activities such as mowing and sprinkling.
12. Compared with Alternative 2, Alternative 3 would restore more SEZ and more floodplain/meadow.

AOB24-4

**The Golf Course Economic Feasibility Analysis is deeply flawed.**

The economic analysis (Appendix E) uses incorrect assumptions and poor methods to reach fallacious conclusions:

The jobs estimate of 76 is for "full and part-time" jobs. On a full-time equivalent basis, the actual number of jobs would be less than half that many, approximately 28.

AOB24-5

The analysis averages data from 2003 to 2006, a period of declining trends, to illustrate revenues, expenses, golf rounds, and payments to State Parks. A better prediction of the future would be based on a continuation of the trends.

The analysis uses a survey of too small a sample, and thus not statistically significant, of the wrong people (current golf course users, not potential ones).

Despite pessimistic conclusions about the feasibility of a 9-hole course, there are 170 such courses in California.

The analysis improperly asserts that all visiting golfers would stop visiting Tahoe if the golf course were no longer 18 regulation holes.

Because of these and other deficiencies, the economic analysis provides no useful guidance to decision makers. A thorough, accurate and honest economic analysis is needed to assess each alternatives' actual impacts, including the number of golfers who would likely golf under Alternative 3's different configurations.

AOB24-5  
cont.

**Access to the river would be reduced under Alternative 2.**

If the golf course were moved into Washoe Meadows State Park as proposed by Alternative 2, virtually the entire river through the part would be paralleled on one side or the other by golf, often within 100 feet. Access to the river would be severely restricted on the upslope side of the west side of the river.

AOB24-6

**Water quality would be diminished under Alternative 2.**

Alternatives 2, 3, and 5 would all fully restore the river and reduce the amount of sediment that erodes from the river channel and increase the amount of sediment and nutrients deposited on the flood plain in storm events.

The TASC appreciates the great strides made by golf in general and the Lake Tahoe Golf Course in particular in being better environmental stewards of the land they occupy. The programs of Audubon International have helped golf reduce its environmental impacts.<sup>2</sup> TASC has no doubt that the intentions of State Parks would be to make Alternative 2 as environmentally acceptable as possible.

But golf has unavoidable runoff of sediment, nutrients, and chemicals. Alternative 2, with nine holes on the western, upslope side of the river, would subject the river to this runoff, possibly threatening the trout fingerlings that could be produced in a restored river.

Upper Truckee River restoration may very well help reduce streambank erosion of sediment and provide other benefits, including reducing mid-lake clarity.

But the addition of more nutrients and other chemicals, as would occur under Alternative 2, is likely to further degrade the nearshore environment of Lake Tahoe because nitrogen released by fertilizer is highly soluble and will easily percolate

AOB24-7

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<sup>2</sup> <http://www.auduboninternational.org/> Audubon International, a golf industry program, is not affiliated with the National Audubon Society.

through the glacial moraine and into the river. Increased nitrogen levels in the lake will result in increased growth of invasive plants such as eurasian milfoil, which is already taking hold, on the river bottom, and will add nutrients to the lake's nearshore. Given the current ongoing degradation of this environment and the lack of scientific understanding of why it is occurring (and so quickly), the nutrient load to the nearshore should not be increased, as Alternative 2 would do.

AOB24-7  
cont.

**Forest habitat would be removed under Alternative 2.**

Alternative 2 would result in the conversion of 45 acres of raw forest on the west side of the Upper Truckee River to golf course. 1,640 trees > 10" DBH would be removed. Lost would be a valuable part of a combination of ecosystems, along with the riparian corridor and the wet and dry meadows, that provide multiple benefits to wildlife. The river, the Park, and Park users would be better off with this forest intact.

AOB24-8

**Alternative 2 would threaten fens and wetlands.**

One of the principal reasons for the protection of Washoe Meadows State Park in the first place was the presence of fens and wetlands. Alternative 2 is too close to the largest and most important of the fens and would surround a wetland.

AOB24-9

**It's not a benefit to put the golf course on "disturbed lands."**

Land on the west side of the river to be occupied by golf course under Alternative 2 is often described as "disturbed."<sup>3</sup> It is inferred that it would be a benefit to replace this "disturbed" land with golf.

AOB23-10

That's false comparison. If this land is the source of sediment runoff because it is disturbed, then it should be reclaimed no matter what. State Parks owns and is responsible for that land and its function, just like other landowners are responsible for BMPs.

**Conclusion.**

In conclusion, the Tahoe Area Sierra Club strongly opposes Alternative 2 and supports Alternatives 3 and 5. Only Alternatives 3 and 5 can lead to the expeditious restoration of the river. Alternative 5 is the best environmentally. Alternative 3 is the best balance of the interests. Alternative 2 is legally infeasible.

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<sup>3</sup> See, e.g., p. 2-50.



- AOB24-1            The commenter requests that river restoration and golf be separated. State Parks has an obligation to manage all of its properties to balance both biological diversity and high-quality outdoor recreation, consistent with its mission statement:
- The mission of the California Department of Parks and Recreation is to provide for the health, inspiration and education of the people of California helping to preserve the state’s extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation.
- The river restoration and golf relocation projects are directly related. The golf course currently occupies the meander belt and floodplain of the river. For many of the alternatives considered, there must be changes made to the existing golf course. Segmentation of the project is not allowable. (PRC section 15378 – “whole of the action”).
- AOB24-2            The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, “Land Use.”
- AOB24-3            The commenter states that Alternative 2 would not be consistent with TRPA thresholds. The commenter also reiterates the conclusion in the draft EIR/EIS/EIS that Alternative 5 would be the environmentally superior alternative. Chapter 4, “Other Required Sections,” of the draft EIR/EIS/EIS evaluates the effects of each of the project alternatives on TRPA’s thresholds.
- AOB24-4            The commenter’s rationale for the superiority of Alternative 3 over Alternative 2 is noted. See the following master responses and responses to comments:
- ▶ Master Response Section 3.3, “Biological Resources,” for a discussion of habitat impacts, wetlands, and fens;
  - ▶ response to comment I7-4 for a discussion of sand lilies;
  - ▶ Master Response Section 3.7, “Economics”;
  - ▶ Master Response Section 3.2, “Land Use,” for a discussion of the settlement agreement and statute;
  - ▶ Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for a discussion of fen hydrology and fertilizer and other chemical use;
  - ▶ Master Response Section 3.5, “Recreation,” for a discussion of recreation access; and
  - ▶ response to comment I160-1 for a discussion of noise impacts.

- AOB24-5 The commenter disagrees with the assumptions used in the economic analysis. See Master Response Section 3.7, “Economics.”
- AOB24-6 The commenter is concerned about decreased access to the river under Alternative 2. See Master Response Section 3.5, “Recreation.”
- AOB24-7 The commenter states the opinion that although golf course management has improved, golf results in unavoidable runoff of sediment, nutrients, and chemicals that would pose a threat to water quality and aquatic resources under Alternative 2. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- AOB24-8 The commenter is concerned about impacts on forest habitat under Alternative 2. See Master Response Section 3.3, “Biological Resources.”
- AOB24-9 The commenter is concerned that Alternative 2 would be too close to the fens and would surround a wetland. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” and Master Response Section 3.3, “Biological Resources.” Refer to Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS for text revisions related to these topics.
- AOB24-10 The commenter states that the areas of “disturbed lands” within Washoe Meadows SP that would be converted to golf course under Alternative 2 should not be considered an environmental benefit, but should be “reclaimed” if it is a source of sediment. See the following response to comment and master responses:
- ▶ response to comment AOB8-6 for a discussion of quarry areas and soil piles.
  - ▶ Master Response Section 3.2, “Land Use,” for a discussion of the area proposed for golf course reconfiguration; and
  - ▶ Master Response Section 3.3, “Biological Resources,” for a discussion of sensitive habitat.



AOB-25

**DATE:** November 4, 2010  
**TO:** TRPA  
**FROM:** South Tahoe Association of REALTORS® Board of Directors  
**RE:** Upper Truckee River Restoration & Golf Course Reconfiguration Project

To whom it may concern:

The South Tahoe Association of REALTORS® (STAR) Board of Directors would like to submit feedback on the TRPA's Upper Truckee River Restoration & Golf Course Reconfiguration Project that is currently open for public comment. STAR represents over 300 REALTOR® members in South Lake Tahoe.

The Lake Tahoe Golf Course plays a substantial role within our local economy. It is a regularly frequented recreation source for both local residents and tourists. It is also a big selling point for second homebuyers looking to move to South Lake Tahoe for its recreation amenities. Removing the golf course entirely, which is proposed in alternative #5, would have detrimental effects on our already fragile local economy, and do away with jobs, of which are sorely needed for our locals.

Also, we feel that reducing the golf course to a 9-hole course would take away the main attraction of this beautiful and popular course. Many tourists and locals enjoy having a full regulation 18-hole course available, and would drive down to the Carson Valley if the Lake Tahoe Golf Course was changed to only 9-holes.

AOB25-1

We, the Board of Directors, have reviewed all 5 alternatives, and have come to the conclusion that alternatives #2 and #4 would be best for the community. Alternative #2 is the most "eco-tourism" friendly with the addition of pedestrian trails along the river, and moving part of the golf course away from the river into less sensitive land. This would also allow for the restoration of a natural meandering pattern for the river with the hope of reducing sediment flow into the lake.

Alternative #4 is the least expensive alternative that still allows for the banks of the river to be stabilized to reduce sediment run-off and help increase lake clarity.

Thank you for your time in reviewing and considering our comments on this important issue. If you have any questions or need clarification, please feel free to contact our office at (530) 541-7007.

Sincerely,

*Theresa Souers*

Theresa Souers, 2010 President  
South Tahoe Association of REALTORS® (STAR)  
on behalf of the STAR Board of Directors

Letter  
AOB25  
Response

South Tahoe Association of Realtors (STAR)  
Theresa Souers, 2010 President on behalf of STAR Board of Directors  
November 4, 2010

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AOB25-1

The commenter's support for Alternatives 2 and 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



# Tahoe-Douglas Visitors Authority

AOB-26

September 27, 2010

The Board members of the Tahoe Douglas Visitor's Authority, upon review of the Upper Truckee River Restoration and Golf Course Reconfiguration Project and the goals of the project as stated in the Executive Summary of the draft EIR/EIS/EIS documents, do hereby declare,

- Whereas Alternative 2 provides for the complete restoration of the Upper Truckee River and surrounding streamside and meadow habitat along the Lake Tahoe Golf Course reach, and
- Whereas Alternative 2 maintains a regulation-size golf course for high-quality outdoor public recreation, and
- Whereas Alternative 2 maintains an annual contribution of \$6,000,000 into the local economy, supports almost 200 jobs, and maintains an annual revenue of \$880,000 to California State Parks as a direct result of Lake Tahoe Golf Course operations, and
- Whereas, Alternative 2 best meets the stated goals of the restoration project and is the best overall solution for the environment, for public outdoor recreation, and for the economy of South Lake Tahoe,

AOB26-1

And do hereby support Alternative 2 and strongly recommend that the Tahoe Regional Planning Agency and California State Parks approve Alternative 2 for implementation.

Respectfully,

John Packer  
Tahoe-Douglas Visitors Authority

AOB26-1

The commenter's support for Alternative 2 and its economic, recreation, and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**David Lass**  
*Northern California Field Director, Sportsman Conservation Project*

AOB-27

November 7, 2010

Cyndie Walck  
CA State Parks and Rec. Sierra District  
PO Box 16,  
Tahoe City, CA 96145

**Re: Public Comment on EIS for California State Park's Upper Truckee River Restoration and Golf Course Reconfiguration Project**

Dear Cyndie:

On behalf of Trout Unlimited (National) and the undersigned businesses and member groups, we submit our comments on California State Park's (CSP) Environmental Impact Statement (EIS) for the Upper Truckee River Restoration and Golf Course Reconfiguration Project. We welcome the opportunity to provide support for CSP to restore this section of the Upper Truckee River to a more naturally functional condition, reduce erosion, and improve meadow habitat while also maintaining a healthy South Lake Tahoe economy through the recreational opportunities provided by the public golf course.

Currently, Trout Unlimited is represented by over 150,000 members nationwide and over 14,000 members within the State of California alone. Our mission is to conserve, protect and restore North America's trout and salmon fisheries and their watersheds. Our vision is that by the next generation, we will ensure that robust populations of native and wild coldwater fish once again thrive within their North American range.

Trout Unlimited is currently in the infancy stage of developing a campaign to designate the Meiss Meadows Inventoried Roadless Area (Headwater of Upper Truckee River) as Federal Wilderness. Permanently protecting the headwaters of the Upper Truckee River is necessary to protect Lake Tahoe clarity and provide a refuge of intact habitat for the federally Threatened Lahontan Cutthroat Trout. As TU continues to work on the "Protect" side of the equation for the Upper Truckee River, we are pleased to see that California State Park's is working hard on the "Restore" part of this equation. Both will be necessary to improve the aquatic habitats of the Upper Truckee River and Lake Tahoe. Together, we feel we can bring positive changes to the Upper Truckee watershed and ultimately Lake Tahoe.

Alternatives 2, 3 and 5 of the Upper Truckee River Restoration and Golf Course Reconfiguration Project will restore the 1.5 mile stretch of the Upper Truckee, which meets both our mission and strategic vision, and therefore we are fully supportive of all these Alternatives as defined within the Project EIS. Though we support all three Alternatives that address stream and meadow restoration, we also believe that Alternative 2 is the stand out option to implement restoration while also maintaining the recreational opportunities and economic benefits of a functional golf

AOB27-1

**Trout Unlimited: America's Leading Coldwater Fisheries Conservation Organization**  
Truckee Office: 10356 Donner Pass Rd. STE B Truckee, CA 96161  
Direct: (530) 587-7110 • Cell: (530) 388-8261 • Email: dlass@tu.org • www.tu.org

course. Essentially, it is the best compromise. Alternative 2 is most attractive to Trout Unlimited because it provides a complete restoration of the river and surrounding meadow habitat, will improve lake clarity by reducing nutrients and sediment flowing into Lake Tahoe, will improve fish and wildlife habitat, improve angling access along the river, and allow the local golf course to continue to provide jobs and needed revenue for California State Parks. The revenue from the golf course, which is the only 18 hole public course in South Lake Tahoe, is estimated at \$6 million dollars to the local economy each year.

AOB27-1  
cont.

One specific recommendation that TU has in supporting Alternatives 2, 3 and 5 of this project is consideration of spawning brown and rainbow trout during implementation of the stream and meadow restoration component of this project. The Upper Truckee River through this reach (and upstream) is one of the most important spawning habitats for brown and rainbow trout running out of Lake Tahoe. I have personally witnessed brown trout exceeding 30" and rainbow trout exceeding 10 pounds spawning in this reach of the Upper Truckee. Trout Unlimited would like the California State Park's to consider the sensitivity and importance of this area for wild Lake Tahoe trout during the spring (rainbows) and fall (browns) when planning implementation of the restoration project.

On behalf of the fish and game resources of the Upper Truckee River, we thank you for the opportunity to comment on California State Park's (CSP) Environmental Impact Statement (EIS) for the Upper Truckee River Restoration and Golf Course Reconfiguration Project. We look forward to working closely with you to develop ecologically sustainable, manageable, and enforceable management actions in the future. Thank you.

Sincerely,



David Lass  
Trout Unlimited; Sportsman's Conservation Project  
10356 Donner Pass Rd. Suite B  
Truckee, CA 96161  
(530) 587-7110  
[dlass@tu.org](mailto:dlass@tu.org)

Drew Irby; Council Chair  
*California Council of Trout Unlimited*

Tom Johns; Vice President/Conservation Chair  
*Tahoe Truckee Fly Fishers*  
Tahoe City, CA



Chip Brown; President  
*San Francisco Fly Casting Club*  
Truckee, CA

Dave Stanley; Owner  
*The Reno Fly Shop*  
Reno, NV

Stefan Mcleod; President  
*Truckee River Chapter TU*  
Truckee, CA

### ***Organizational Overview***

Trout Unlimited (TU) is the oldest and largest coldwater fish conservation organization in North America. TU's mission is to conserve, protect and restore native trout and salmon populations throughout their historic watersheds. TU accomplishes this mission through a combination of direct advocacy for changes in law and policy, organizing of sportsmen, public education and outreach, research and dissemination of new science, and on-the-ground conservation projects implemented by TU's 150,000 grassroots members and chapter leaders.

TU, based in Arlington, Virginia, operates field offices in states and regions with especially high values for coldwater fisheries and habitat. California is one such state, with its exceptional fishing and hunting opportunities, eleven native species of trout and salmon (the most of any state outside of Alaska), and thousands of miles of rivers. However, many of California's native fish are imperiled and face a multitude of threats, including human development, water use, and now climate change. Native trout that TU is working to protect and restore in California include the Lahontan cutthroat, the Paiute cutthroat, central and southern coastal steelhead, Goose Lake and Warner Lake redband, the California golden trout, and coho salmon.

We have offices in Truckee, Berkeley, Fort Bragg and Santa Cruz.

AOB27-1

The commenter's support for Alternatives 2, 3, and 5 is noted. The commenter requests that spawning habitat be considered during implementation of stream restoration. See response to comment AOB21-1.

October 1, 2010



AOB-28

State of California Department of Parks and Recreation  
Sierra District  
Cyndie Walck  
PO Box 16  
Tahoe City, CA 96145

Subject: Request for Extension of Comment Period for draft EIR/EIS/EIS for Upper Truckee River Restoration and Golf Course Reconfiguration Project

Dear Cyndie Walck:

The Washoe Meadows Community requests a 30-day extension on the comment period for the subject document.

It is necessary to know how the proposed project is going to affect the existing environment (i.e., environmental setting). At the September 8, 2010 Parks Department meeting, we requested that GPS coordinates be provided for the golf course hole/tee/fairway locations proposed for relocation within Washoe Meadows State Park. We were told that these would be given to us.

On September 22, 2010, we were provided with a map of the area with GPS coordinate grid lines. However, these grid lines are widely spaced and there is no way to accurately determine the location of the golf course holes, tees or fairways. The units shown on the map they gave us have an accuracy of very roughly 1,200 feet in one direction and very roughly 2,000 feet in the other direction. We have spent time trying to interpolate and find the locations in the park but the information provided has not been useful for this purpose.

On September 30, we received a list of coordinates, but with no names associated with each pair. Again this makes it impossible to determine the project's effect on the existing environment, since we are unable to "ground-truth" the layout of the course. So we have lost valuable and irreplaceable time trying to determine how the course will be laid out on the existing environment, and which natural resources may be adversely affected.

Furthermore, the EIR/EIS is an extensive document. It is very difficult for ordinary citizens with day jobs and other responsibilities to find the time to review the document within the timeframe provided. Even though we have divided up the review responsibilities within our group to tackle this job, we still need to review each other's separate work and organize a cohesive comment letter on the adequacy of the draft document's environmental review.

We request more specific GPS coordinates so we can evaluate the on-the-ground effects of the proposed project, and, based on the Department's inability to provide us with this information and the size of the draft environmental review document, we request an additional 30-day public review and comment period.

AOB28-1

Thank you for your consideration of this request.  
Yours truly,



*Lynne Paulson*

Lynne Paulson  
Washoe Meadows Community  
Email [LCPaulson@comcast.net](mailto:LCPaulson@comcast.net)

cc: Marnie Mayville, Bureau of Reclamation  
Mike Elam, TRPA

AOB28-1

The commenter's request for more specific GPS coordinates and an additional 30 days to review the document is noted. The comment period was not extended; however, State Parks stated that comments could still be submitted without a guarantee that they would receive a response. The comment period was extended from 75 days to 85 days, which is twice the statutorily required review period for an EIR under CEQA and 25 days more than required under NEPA. GPS coordinates were also provided. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



California Park & Recreation Commission 10-8-10

My name is Lynne Paulson from the Washoe Meadows Community ([www.washoemeadowscommunity.org](http://www.washoemeadowscommunity.org)). As most of you know, I represent an organization of people from throughout the state that wants to preserve the integrity of Washoe Meadows State Park near South Lake Tahoe which is threatened by golf course development if the Parks Department moves 9 holes of the Lake Tahoe Golf Course into the park.

As Commissioners, the people of California rely on your wisdom and judgment to ensure that Washoe Meadows and all State Parks remain part of the heritage that we must leave for the following generations.

A lack of a General Plan for the Park for over 26 years has made it impossible to properly manage the natural resources of the park and left it vulnerable to threats such as the golf course. The proposal to move 9 holes of the golf course into the park affects a huge area of the park that would then be within sight and hearing distance of the golf course. It cuts off park users from direct access to any section of the river that is now a central feature in the park's attractions. Wildlife habitat would be replaced by acres of golf course. It is only feasible to suggest a plan like this because the park has been devalued by the Parks Department.

Please don't easily split up a park and remove its protections as a park in order to serve short-term economic profits.

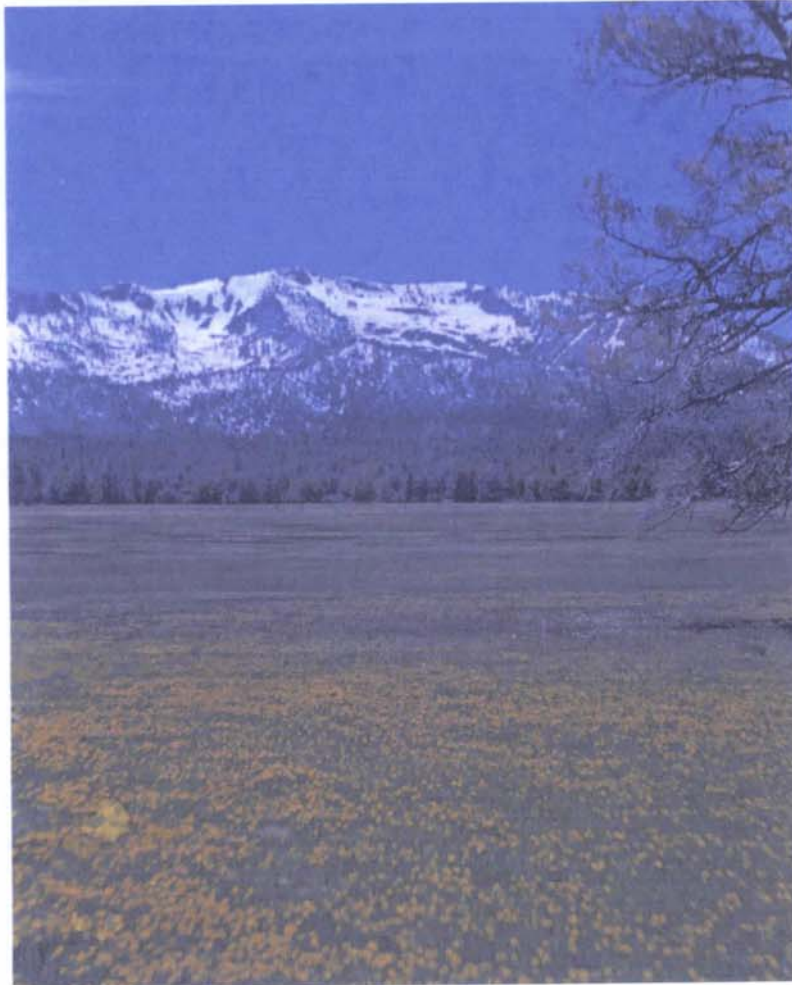
In 2006 when this proposal was made public, we had over 200 people sign a petition against it and almost 100 people sent in letters against it. Washoe Meadows Community also submitted extensive comments. We are now working on comments to the draft EIR/EIS.

Washoe Meadows State Park was acquired for its natural resource values. Restoring this stretch of the Upper Truckee River is important but the proposed Alternative 2 that would move 9 holes of the golf course from the State Recreation Area into the park is contradictory to those values. Although the draft EIR/EIS doesn't indicate any preferred option, I was shocked to find out that state employees held a meeting with golfers, in which they asked the golfers to counter the stack of letters the Parks Department had received from neighbors and environmentalists. The meeting attendees were directly asked to support Alternative 2.

My handout for the Commission includes my statement and also a letter from one of our Washoe Meadows Community members which was published in the Tahoe news.

Thank you.  
Lynne Paulson  
Email [LCPaulson@comcast.net](mailto:LCPaulson@comcast.net)

AOB29-1



1950's photo courtesy of Jim Hildinger

View of meadow in the 1950's before construction of the golf course.  
This is now Lake Valley State Recreation Area.



Bear in Washoe Meadows State Park  
August 13, 2010





Pine Marten in Washoe Meadows State Park  
February 23, 2010

AOB29-1

The commenter's opposition to Alternative 2 is noted. The commenter is concerned that no general plan has been prepared for Washoe Meadows SP. See Master Response Section 3.2, "Land Use," for a discussion of consistency with applicable plans, policies, and regulations.

TRPA APC  
10/13/10



My name is Lynne Paulson from the Washoe Meadows Community ([www.washoemeadowscommunity.org](http://www.washoemeadowscommunity.org)). We are an organization of people from throughout the state that want to preserve the integrity of Washoe Meadows State Park which faces devastation if the Parks Department moves a golf course into the park.

The proposal to move the golf course is in conflict with California's legislative statute and legal settlement agreement of 1984 under which Washoe Meadows State Park was formed in order to preserve the land and protect it from development. The land was acquired by the state "for the purpose of protecting an irreplaceable watershed" as well as wetlands, meadows and wildlife habitat. A reading of these entire documents clearly expresses the significance of the Park's valuable natural resources and sensitive ecology.

AOB30-1

When the State first acquired the land, the records show that there was a debate about whether to retain the golf course. It was finally decided to allow continuing operation of the golf course on land that was classified as a State Recreation Area, an important distinction from Washoe Meadows State Park. However, now the golf course interests are being maximized at the expense of Washoe Meadows in open defiance of legislative protections afforded to the Park.

Many of our members are golfers and we do not object to continuing with golf on the east side of the river. We do support river restoration but we don't think it should be combined with moving the golf course into the park and onto an additional stretch along the river as outlined in Alternative 2. The golf course should remain within the boundaries of the State Recreation Area with a reconfigured 9 or 18 hole golf course as mentioned in the description of Alternative 3.

It is our contention that Alternative 2 will result in significant unavoidable impacts to wildlife species and sensitive biotic habitats (fens and spring complexes), to aesthetics (users of the park will now be confronted with the golf course) and to continued non-consumptive recreational activity in the park such as hiking, bird watching, botanizing, snow-shoeing, horseback riding, and cross-country skiing. Some areas of deficiency in the draft EIR/EIS include failure to address significant impacts from the proposed Alternative 2 such as

AOB30-2

- the severe impact on recreational park users when the park is fragmented and so many acres of the park will be within close distance of the golf course.
- the impact on wildlife habitat from replacement of many acres of forest, meadow and wetlands with golf course.
- the unequal quality of the land that is proposed for exchange as confirmed in the Parks Department's own General Plan for Lake Valley State Recreation Area.

AOB30-3

AOB30-4

- consequences of allowing the complicated turf management practices of a golf course with all their herbicides, pesticides, fungicides and fertilizers to be applied on sensitive land.

The economic analysis has many unsubstantiated assumptions that will be pointed out in our comments. Significantly, it doesn't address the reality of the current and predicted continuing decline in golf as a recreational activity and its replacement with lower-impact and family friendly sports such as hiking, river rafting, bird watching and enjoyment of nature.

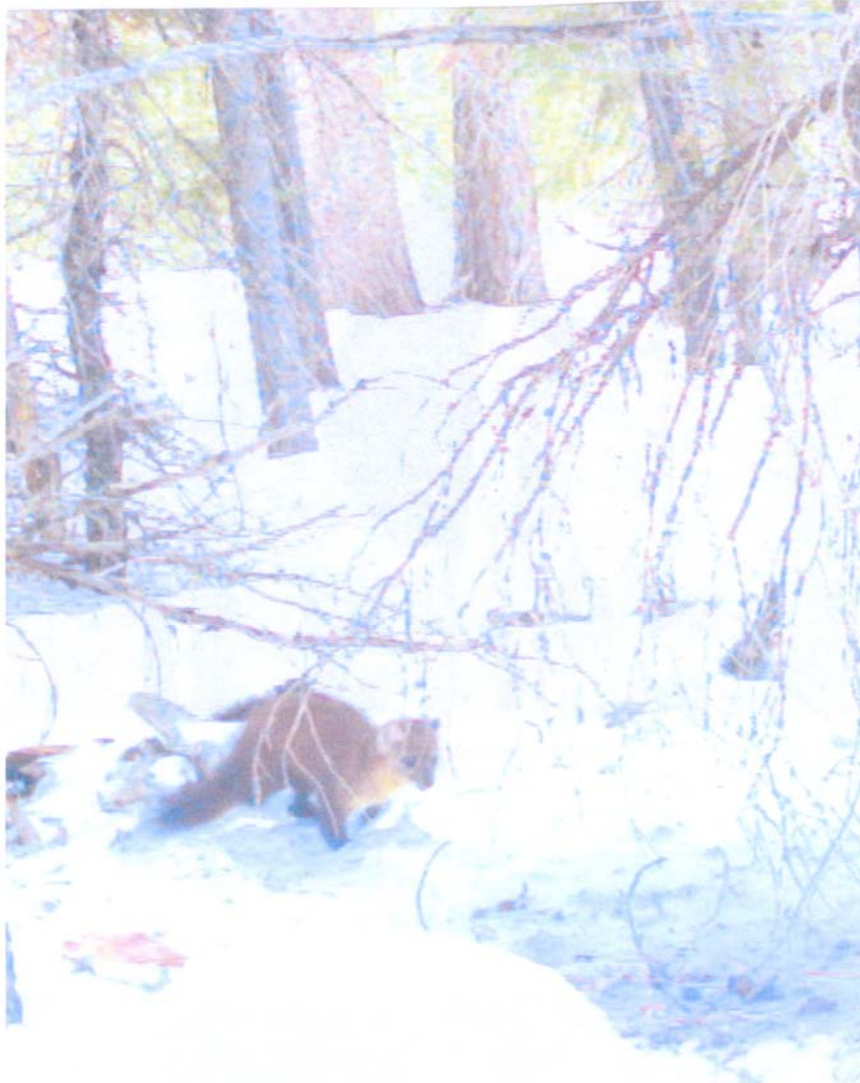
We ask that you continue to review information related to the draft EIR/EIS because we will have more detailed comments by the end of the public comment period. The draft environmental document is lengthy and requires extensive review. Some of our review of Alternative 2 has been impacted by a lengthy delay in receipt of detailed information we requested on the proposed location of the golf course within the park. We do know, however, that the proposed golf course layout is larger than the present footprint and provides for a championship golf course rather than the regulation golf course that exists today.

As commissioners, the people of California and Nevada rely on your wisdom, judgment and guidance to fulfill TRPA's mission to protect the Lake Tahoe environment in a way that benefits not just our current population but also future generations.

Thank you.

Lynne Paulson  
Email [LCPaulson@comcast.net](mailto:LCPaulson@comcast.net)





Pine Marten in Washoe Meadows State Park  
February 23, 2010



Bear in Washoe Meadows State Park  
August 13, 2010



The debate swirling around the Upper Truckee River Restoration and Golf Course Reconfiguration Project is not a debate about river restoration. All participants support this end. It's not even a debate between golfers and environmentalists. Few, if any, deny the right of the golfers to play on the current Lake Tahoe Country Club. This debate is rapidly becoming a confrontation between three state and local agencies, and concerned locals and neighborhood groups like the Washoe Meadows Community. The involved agencies are showing an undo bias toward Alternative 2, advocating golf course expansion. They appear ready to do this by ignoring preeminent laws protecting sensitive land, historical and cultural sites, diminishing animal and plant habitat, and quiet and peaceful local neighborhoods.

Aside from the obvious indifference to their own environmental standards, misleading the public about their intentions, and ignoring input from their own constituents, this is being pushed at a time of decreasing popularity in golf. The Environmental Impact Report or EIR clearly details the declining revenues of the current State Recreation Area's activities. And unless Global Warming overwhelms us sooner than expected, Tahoe's fragile golf season is not going to get any longer.

It's quite clear the State Parks, TRPA, and Bureau of Reclamation, are stretching their powers here by ignoring their own history of written intentions and guidelines. The land in question, is bordered roughly by Hwy 50, North Upper Truckee Rd., Sawmill Rd, and Tahoe Paradise. It was purchased by the state in 1984. The 1984 California Legislative Statute appealed for the purchase using taxpayer dollars. They called it an act of urgency; "in order to acquire as state lands an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadows, and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed". The parcel contained an existing golf course to the East, and a fragile and diverse piece of land to the West. Separating the two, was the main tributary of Lake Tahoe, the Upper Truckee River. The side containing the golf course was designated a State Recreational Area, and the land across the river, bordering numerous neighborhoods along North Upper Truckee, was designated as a state park, originally named Washoe Meadows Wildlife Refuge.

Here, in the words of the agencies most zealous for expansion, are the reasons Alternative 2 displays a contemptuous disregard of their own standards of stewardship. According to the States' own Unit Purpose Statement adopted in 2000 "the purpose of the Washoe Meadows State Park is to preserve and protect a wet meadow area associated with Angora Creek and the Upper Truckee River at the southwest side of the Tahoe Basin. The unit's associated forest sustains Jeffrey ...and Lodgepole pine. The unit contains 14 Native American occupancy sites and remnants of a historic dairy, and is contiguous to other public lands important for their open space values and recreational uses." Consider this statement comes before the Angora fire. It should be apparent how much more important these forests and wetland areas become as a habitat for indigenous wildlife and plants.

The Plan Area Statement of the TRPA Code of Ordinances says this about "PAS 119" (Country Club Meadow), "the following special policies ...apply to the study area:

- Areas of significant resource value or ecological importance within this Plan Area should be designated as natural areas, and they should be buffered from intensive uses.
- Creation of waterfowl habitats in association with restoration efforts of disturbed areas should be encouraged.
- Intensive uses in this Plan Area that require development of impervious coverage should be discouraged.

The agencies now argue some of these areas have been “previously disturbed”, thus implying it is acceptable to disturb them again. That’s like saying since a bank has been robbed it’s acceptable to rob it again.

What these agencies must remember is that the land in question is theirs to protect, not abuse. While they have been designated guardians of this sensitive and precious parcel of PUBLIC land, it is not theirs. The land belongs to all of us! We must let them know how we feel. Ways to comment are available at [www.washoemeadowscommunity.org](http://www.washoemeadowscommunity.org).

Steve Szekely  
(530)577-7207  
dixiemtn@sbcglobal.net



- AOB30-1 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, “Land Use.”
- AOB30-2 The commenter is concerned about impacts on biological resources, including fens within Washoe Meadows SP, aesthetics, and recreation access. Section 3.7, “Scenic Resources,” of the draft EIR/EIS/EIS discusses potential impacts of the alternatives on scenic resources. See Master Response Section 3.3, “Biological Resources,” for a discussion of impacts on biological resources, including fens. See Master Response Section 3.5, “Recreation,” for a discussion of recreation access within the study area.
- AOB30-3 The commenter has concerns about impacts on wildlife habitat. See Master Response Section 3.3, “Biological Resources.”
- AOB30-4 The quality of the land proposed for exchange between Lake Valley SRA and Washoe Meadows SP was addressed in Chapter 2, “Project Alternatives,” and several impact discussions in the draft EIR/EIS/EIS, including those in Section 3.3, “Hydrology and Flooding”; Section 3.4, “Geomorphology and Water Quality”; Section 3.5, “Biological Resources”; Section 3.6, “Earth Resources”; and Section 3.7, “Scenic Resources.” The commenter does not define “unequal quality of land”; however, Alternative 2 proposes to restore SEZ adjacent to the Upper Truckee River and relocate the golf course to an area farther from the river, much of which is within higher capability and previously disturbed lands. See Master Response Section 3.2, “Land Use,” for more detail on the quality of land proposed for exchange. In this master response, the comparative areas and resource qualities are discussed.
- AOB30-5 The commenter is concerned that the draft EIR/EIS/EIS did not address impacts of “complicated turf management practices” under Alternative 2 on sensitive land. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- AOB30-6 The commenter disagrees with the assumptions used for the economic analysis. See Master Response Section 3.7, “Economics.”
- AOB30-7 The commenter’s request that information related to the draft EIR/EIS/EIS continue to be reviewed is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



November 15, 2010  
Cyndie Walck  
California State Parks and Recreation  
Sierra District  
P.O. Box 16  
Tahoe City, CA 96145  
[utproject@parks.ca.gov](mailto:utproject@parks.ca.gov)

Tahoe Regional Planning Agency  
P.O. Box 5310  
128 Market Street  
Stateline, CA 95814

U.S. Bureau of Reclamation  
Mid-Pacific Regional Library  
2800 Cottage Way  
Sacramento, CA 95825

Re: Draft EIR/EIS/EIS Upper Truckee River Restoration and Golf Course  
Reconfiguration Project (State Clearinghouse #200608215)

Dear Ms. Walck:

We appreciate the opportunity to comment on the subject EIR for this very important project. It is an extensive document that has a great deal of information about a place that is special to us.

The Washoe Meadows Community (WMC) consists of hundreds of citizens of California and patrons of Washoe Meadows State Park. From the beginning, prior to the issuance of the Notice of Project (NOP) in 2006, WMC has supported restoration of the Upper Truckee River through Washoe Meadows State Park and Lake Valley State Recreation Area, but has been concerned about the proposal to convert a large area of Washoe Meadows State Park to a golf course. WMC filed detailed comments on the NOP on October 6, 2006.<sup>1</sup>

Many WMC members are frequent users of Washoe Meadows State Park and have intimate knowledge of the Park and its features and resources. Our review of the EIR/EIS/EIS has been enriched by the knowledge and wisdom of these members.

We have reviewed the Draft EIR/EIS/EIS titled Upper Truckee River Restoration and Golf Course Reconfiguration Project and have identified many issues. The comments that are attached to this letter detail these issues.

<sup>1</sup> Draft EIR/EIS/EIS. Volume III.

Ms. Walck  
November 15, 2010

Page 2

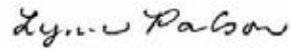
In many instances, our comments reach conclusions, in particular about Alternative 2. Those conclusions should be viewed in the context of the EIR/EIS/EIS in this way: the EIR/EIS/EIS should have addressed issues it failed to address; the EIR/EIS/EIS should have addressed issues in a different way or the EIR/EIS/EIS should have reached different conclusions.

The Washoe Meadows Community supports Alternative 3 or a yet to be defined alternative which restores the river, retains Washoe Meadows State Park in its entirety, and meets the primary purpose of this project which is to restore the river and protect the environment.

A0B31-1

Our comments are being submitted with an additional WMC comment letter from our attorneys at Kenyon Yeates, LLP.

Sincerely,



Lynne C. Paulson  
LCPaulson@comcast.net

on behalf of Washoe Meadows Community

P.O. Box 8787  
South Lake Tahoe , CA 96158  
[info@WashoeMeadowsCommunity.org](mailto:info@WashoeMeadowsCommunity.org)  
[www.WashoeMeadowsCommunity.org](http://www.WashoeMeadowsCommunity.org)

Attachment - Washoe Meadows Community Comments

**Washoe Meadows Community Comments on  
Draft EIR/EIS/EIS – Upper Truckee River Restoration  
and Golf Course Reconfiguration Project – August 2010**

**Restore the Upper Truckee River  
and  
Save Washoe Meadow State Park**



<b>Section</b>	<b>Description</b>
<b>1</b>	<b>Plans, Policies, and Procedures</b>
<b>2</b>	<b>Comparison of WMC's Recommendations in NOP with EIR/EIS/EIS</b>
<b>3</b>	<b>Public Recreation Planning Workshops in 2007</b>
<b>4</b>	<b>Evaluation of Alternative Locations</b>
<b>5</b>	<b>General Comments</b>
<b>6</b>	<b>Environmental Planning</b>
<b>7</b>	<b>Economic Feasibility Analysis</b>
<b>8</b>	<b>Water Quality</b>
<b>9</b>	<b>Wildlife Species of Special Interest</b>

## 1 Plans, Policies, and Procedures

The project and the EIR/EIS/EIS must conform to applicable policies, regulations, and statutes. However, there are serious conflicts and deficiencies<sup>1</sup> related to:

- the Litigation Settlement Agreement,
- California Statute,
- the Parks Classification Decision,
- the California Public Resources Code,
- Washoe Meadows State Park Purpose Statement,
- State Parks Policies,
- the State Parks Planning Handbook, and
- federal funding processes.

### Litigation Settlement Agreement

The litigation settlement agreement<sup>2</sup> describes the events leading up to the lawsuit filed over the properties that now comprise Washoe Meadows State Park and Lake Valley State Recreation Area (LVSRA).

In 1972 developers wanted to build 2,800 homes and some commercial facilities. The Tahoe Regional Planning Agency (TRPA) refused to approve the application and rezoned the property from a "General Forest and Conservation Reserve" to entirely a "Conservation Reserve" zone designation. The developers sued in 1973 and the case went all the way to the US Supreme Court.

In 1984 the case was settled prior to going to trial. In a compromise agreement the state agreed to purchase the land for about \$5 million.

The litigation settlement agreement states:<sup>3</sup>

WHEREAS, the unique characteristics and location of the subject property have been described by biologists, hydrologists, limnologists, plant physiologists and summarized as follows: The subject property contains unique and irreplaceable resources in the Lake Tahoe Basin, and is extremely valuable to the maintenance of the water quality of Lake Tahoe itself.....

The litigation settlement agreement describes the purpose of acquisition of the property by the State of California to: "preserve the region's environmental and recreational values and would help restore and insure equilibrium between the region's natural endowment and

AOB31-2

<sup>1</sup> Impact Statements 3.2-2 and 3.2-3 in Draft EIR/EIS/EIS Vol II

<sup>2</sup> Litigation Settlement Agreement, Lake Country Estates, Inc., et al Plaintiffs vs. Tahoe Regional Planning Agency, et al, Defendants, No. CV-F-81-127-REC and Lake Country Estates, Inc., et al., Plaintiffs, vs. California Tahoe Regional Planning Agency, et al, Defendants, No. CV-F-81-132-REC, dated June 12, 1984

<sup>3</sup> Page 3.

its man-made environment, goals deemed imperative by Congress in the Lake Tahoe Basin..."<sup>4</sup>

The agreement also promotes "the maintenance of significant scenic, recreational, educational, scientific, natural and public health values..." all of which characterize the values of Washoe Meadows State Park.

The purpose for state purchase of the property also includes protecting and preserving:

- Tahoe's natural resource values
- Exceptional wildlife habitat
- Natural wildlife corridors at the Upper Truckee River and the intersecting Angora Creek
- Habitat for birds that migrate on the Pacific Flyway
- Diverse plant communities including rare plants
- Low lying ground with high water table and capability to uptake nutrients and trap sediments which would otherwise flow into Lake Tahoe.
- Two creeks and several pond areas
- Attractive forests
- Meadows
- Valuable wildlife areas where forest and meadow intersect
- Unusual fish habitat described as follows:

The most unusual feature of this property, however, is the presence of a fish habitat which has never before been observed in the Tahoe Basin. The western portion of the property is characterized by a series of wetland and bog plant communities recognized as unique in the High Sierra. These bogs and wetlands contain streams which flow through the forest areas and into holes of 2' to 3' depth. These holes are connected by subsurface stream flows and within these holes, resident Eastern Brook Trout have been observed. The trout are able to live year round in these deep holes because the water is below the freezing level and is supplied by the subsurface flows. Such a phenomenon is of great scientific interest. The Upper Truckee River is noted for the best trout fishing in the Lake Tahoe Basin and the segment of the river which bisects the property provides the best trout habitat along the river. It is a spawning area for Rainbow, Eastern Brook and Brown trout.<sup>5</sup>

The settlement agreement also concludes that:

The unique subject property is scientifically valuable, environmentally sensitive, vital to the maintenance of riparian habitat and to the maintenance of water quality in Lake Tahoe, and is, therefore, highly suitable for public acquisition in order to preserve and maintain these natural resource values...<sup>6</sup>

A0B31-2  
cont.

<sup>4</sup> Page 5.

<sup>5</sup> Pages 4-5.

<sup>6</sup> Page 5.

The EIR/EIS/EIS and its description of Alternative 2 are not in conformance with the language of the settlement agreement.

AOB31-2  
cont.

#### California Statute

To implement the settlement agreement, the California legislature enacted "an urgency statute."<sup>7</sup> Its stated purpose included the acquisition as state lands of "...an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadows, and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed through which the Upper Truckee River supplies approximately 40% of the water flowing into Lake Tahoe..." Its purpose also was "to settle and dismiss, with prejudice, the litigation regarding that property..." The statute emphasized urgency: "...it is necessary that this act take effect immediately."

AOB31-3

The description of the land in the statute indicated the importance of land conservation for this parcel. The EIR/EIS/EIS and its description of Alternative 2 are not in conformance with this statute.

#### Parks Classification Decision

In the cover letter transmitting the Resource Summary,<sup>8</sup> the park area was determined to be classified as park because "the project lands west of the Upper Truckee River ... contain outstanding values of statewide significance and areas capable of being restored to such values." The park was named Washoe Meadows SP because the name "recognizes both the Native American historic presence and the environmentally sensitive natural resources."

In March, 1987, the Commission recommended that the land west of the Upper Truckee River be a State Park "due to its wetlands, meadows, and wildlife habitat."<sup>9</sup>

The golf course area was recommended for classification as a state recreation area to allow golf course operation to continue.

AOB31-4

The 1987 decision to continue to operate the golf course may have been in contradiction to the values set forth in the litigation settlement agreement and statute. The property was acquired "for public uses compatible with the property's natural resource and environmentally sensitive features."<sup>10</sup> It further indicated that "any human disturbance (as by development) within the reaches of the stream environment zone of the Upper Truckee River could have long-lasting adverse effects on the quality of water flowing into Lake Tahoe."<sup>11</sup> It is also stated that "By preventing the flow of nutrients and sediments into Lake Tahoe, the Lake's remarkable clarity is preserved—a clarity which has been observed in only one other location in the world, resulting in the Congressional recognition of Lake Tahoe as a national treasure."<sup>12</sup> The Resource Summary document<sup>13</sup> mentions water

<sup>7</sup> California Legislative Statute 1984 CH. 1470 SEC. 3

<sup>8</sup> Transmittal letter for Resource Summary dated Feb 4, 1987.

<sup>9</sup> Minutes from meeting of the California State Park and Recreation Commission, March 13, 1987.

<sup>10</sup> Page 8 of litigation settlement agreement.

<sup>11</sup> Page 3

<sup>12</sup> Page 3



quality concerns in the Tahoe Basin, especially from fertilization of golf courses in the watershed.

This language could have precluded continuation of use of a golf course on the banks of the Upper Truckee River. More to the point for the decisions that will be made as a part of this process, accepting the land with golf is entirely different from approving development of a new course. Just imagine proposing a golf course in the Park if one didn't already exist. Linking river restoration to the prevention of revenue loss has created temptation for resource managers to compromise the core values of the Department of State Parks and Recreation (State Parks).

These documents and statutes together establish the values for which the property was to be brought into the public trust and preserved.

However, State Parks now states that these values don't apply to the land identified in Alternative 2 into which golf course holes and fairways would be moved.<sup>14</sup> Part of this area was restored several years ago.

The proposal for Alternative 2 would be in conflict with the values stated in the Commission's classification decision. The EIR/EIS/EIS fails to adequately address this in discussions of impact 3.2-3.

#### California Public Resources Code

Section 5001.9 of the California Public Resources Code indicates that no new facility may be developed in any unit of the state park system unless it is compatible with the classification of the unit. A golf course is clearly not compatible with Washoe Meadows State Park's classification.

Section 5002.1 specifies that there needs to be an inventory of the unit's scenic, natural and cultural features, including, but not limited to, ecological, archaeological, historical, and geological features. No such inventory for Washoe Meadows State Park has been documented and made available to the public since the Resource Summary of 1987.<sup>15</sup> If such a revision were prepared, it must be submitted by State Parks to the Commission prior to its consideration of reclassifying park land.

The Resource Summary describes Washoe Meadows State Park as a "natural oasis" in the discussion on the value of the area's aesthetics, noting "from the center of the western portion, all one sees are lush meadows, brooks, and snow-capped peaks."<sup>16</sup> This would change under implementation of Alternative 2. The golf course, described as a visual and audible intrusion, would adversely affect a greater portion of the park.

AOB31-4  
cont.

AOB31-5

<sup>13</sup> State of California, Department of Parks and Recreation, Lake Country Estates Project, Resource Summary, February 1987.

<sup>14</sup> State Parks personnel at the 9/8/10 State Parks public meeting at Lake Tahoe Golf Course.

<sup>15</sup> State of California, Department of Parks and Recreation, Lake Country Estates Project, Resource Summary, February 1987.

<sup>16</sup> Page 34.

Section 5002.2 specifies the need for a general plan for Washoe Meadows State Park or any unit that was reclassified by the State Park and Recreation Commission. Neither the reclassification nor preparation of a general plan has taken place for Washoe Meadows State Park. In the 26 years of ownership by State Parks, Washoe Meadows State Park has never had a general plan. A general plan would contain specific long-range management objectives for the unit consistent with its objectives. A plan would be used to evaluate and define the proposed land uses, facilities, concessions and operation of the unit. It would to serve as a guide for the future development, management, and operation of the unit. Without a general plan, Washoe Meadows State Park is vulnerable to a piecemeal, patchwork approach such as Alternative 2.

The section states:

*(a) Following classification or reclassification of a unit by the State Park and Recreation Commission, and prior to the development of any new facilities in any previously classified unit, the department shall prepare a general plan or revise any existing plan, as the case may be, for the unit. (Emphasis added.)*

Nine holes of a golf course, restrooms, a bridge, and roads clearly constitute new facilities, in violation of this code section.

Section 5002.2 (b) allows for exemptions from the general plan requirement, but only for:

*... the repair, replacement, or rehabilitation of an existing facility; the construction of a temporary facility, so long as such construction does not result in the permanent commitment of a resource of the unit;*

Building a golf course in Washoe Meadows State Park represents a permanent commitment of the land, wildlife and dispersed recreation "resources" of the state park unit. The exemption from the requirement to prepare a general plan before developing new facilities would not qualify alternative 2 for an exemption.

The assertion in the EIR/EIS/EIS regarding Impact 3.2-3 being less than significant for alternative 2 is not correct.<sup>17</sup>

Section 5019.53 describes the character and nature of state parks. Washoe Meadows State Park was purchased because it contains many important historical, archaeological, ecological, geological properties and values. These include Washoe Indian cultural and historical sites, ranching sites, rare plants, fens and spring complexes and extensive wildlife habitat suitable for rare and endangered species. In defining the land as state park, its purpose is:

*"to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of ecological regions of California such as the Sierra Nevada, ..."*

This code section declares:

<sup>17</sup> Page 3.2-15.

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cont.

*"Each state park shall be managed as a composite whole in order to restore, protect and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established."*

Fragmenting the park and exchanging land of unequal value would violate this code section. The many unique ecosystems of the park with their complex interactions would have their natural dynamics of ecological interaction disrupted. The wildlife habitat would become a golf course rather than a natural wildlife environment.

State Parks has a vision and mission to preserve areas for the 7<sup>th</sup> Generation.<sup>18</sup> This is supported in this code section:

*"Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural and ecological values for present and future generations."*

To develop a golf course within Washoe Meadows State Park would not preserve the natural values including its wildlife habitat. It would severely disrupt its scenic values, trading views of the forest, wetlands, meadows, river and mountains for views of the golf course. The Washoe Indian Tribe cultural sites would be inaccessible for tribe members or future educational purposes. The ecological values would be damaged as many sensitive upstream spring complexes and fens are affected by nearby golf course development. The Seventh Generation further emphasizes the protection of parks for future generations and states: "This system of parks is being held in trust for those generations that come after us."

This code section also specifies that improvements to the park can only be made for certain types of recreational activities and that these improvements cannot "involve major modification of lands, forests, or waters." Improvements that "do not directly enhance the public's enjoyment of natural, scenic, cultural or ecological values of the resource" are specifically forbidden. It is stated that these resources are "attractions in themselves" and it is implied that they do not require major land modifications to preserve those attractions. To reclassify a portion of Washoe Meadows State Park land to State Recreation Area for the purpose of developing golf course holes on it would sidestep these regulations that have been made to protect park land for perpetuity. Instead of confronting these issues head-on, it would be a back-door approach to the decision on reclassification by combining the classification issue with unrelated concerns regarding the financial viability of the golf course.

This section of the code also points out that state parks may be established in the terrestrial or nonmarine aquatic (lake or stream) environments of the state. It is very important that Washoe Meadows State Park has been established to include important stream environments in the Upper Truckee River watershed including Angora Creek and approximately a 1.2 mile segment of the Upper Truckee River.

**Section 5019.56** makes it clear that state recreation areas are not suitable for "areas containing ecological, geological, scenic, or cultural resources of significant values." These

<sup>18</sup> <http://www.parks.ca.gov/pages/23071/files/seven01.pdf>

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areas are to be preserved in one of a number of other types of state park system units, one of which is the designation of state parks.

The section states:

*(a) State recreation areas, consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local needs. The areas shall be selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, or proven recreational resources such as manmade or natural bodies of water....*

Washoe Meadows State Park has significant fens, spring complexes, wildlife habitat, and historical and cultural sites that should be protected and would be severely impacted by a golf course development.

A project that requires reclassification of land within Washoe Meadows State Park to downgrade its protections to those of a State Recreation Area and to develop a golf course on that land would be in conflict with these California Resources Code sections that were established to specifically protect state park land.

The EIR/EIS/EIS fails to adequately address these issues with conflicts of Alternative 2 and the California Public Resources code in the discussion of impact 3.2-2.

#### **Washoe Meadows State Park Purpose Statement**

The purpose statement for Washoe Meadows State Park is:

*to preserve and protect a wet meadow area associated with the Angora Creek and the upper Truckee River at the southwestern side of the Lake Tahoe basin. The unit's associated forest areas sustain Jeffery pine and an exceptionally large specimen of lodgepole pine. The unit contains fourteen Native American occupancy sites and remnants of an historic dairy, and is contiguous to other public lands important for their open space values and recreational uses.*

This statement highlights preservation and protection of the park's natural and cultural resources. The Park contains significant forests, meadows, wetlands, rare plants, wildlife habitat, historic ranching sites and Washoe Indian cultural sites. This park's land is also mentioned as being important because it is contiguous to other public lands important for their open space values and recreational uses. The park's educational, inspirational and recreational benefits for the public are mentioned.

The purpose statement for Washoe Meadows State Park also says how State Parks should manage the Park:

*California State Parks will preserve, protect, restore, interpret and manage the unit's natural, cultural, and aesthetic resources, features and values, making them available to the public for their educational, inspirational and recreational benefits.*

A transformation of a large portion of this park's land to golf course landscape, as in Alternative 2, would be inconsistent with the Park's purpose.

The EIR/EIS/EIS fails to adequately address these this in the discussion of impact 3.2-3.

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**State Parks Policies**

State Parks and the Commission have adopted policies to guide the management of all state park units.<sup>19</sup>

Preamble

This section of the Statements of Policy indicates that “a continuing review of park policies is essential to keep them consistent with recreational trends....” The selection of Alternative 2, which would transform approximately 70 acres of parkland to create the golf holes and approximately 25 acres of unusable park land around the holes, runs counter to the continuing trend of decreasing public interest in golf as a recreation, and increasing interest in other lower-impact forms of recreation such as bicycling, hiking, bird watching, snowshoeing, cross country skiing and floating. State Parks’ own surveys coincide with widely published information on these trends in recreational needs. To substitute the year-round family-oriented recreation in Washoe Meadows State Park for seasonal golfing activities which have a declining trend makes little sense.

This policy notes that the State Parks holds land “in trust as irreplaceable portions of California’s natural, cultural, and historic heritage.” Transformation of approximately 95 acres of Washoe Meadows State Park to a golf course development would violate this public trust.

Policy I.1 2005 California Recreation Policy

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This policy states:

*Recreation areas should be planned and carefully managed to provide optimum recreation opportunities without damaging significant natural or cultural resources. Management actions should strive to correct problems that have the potential to damage sensitive areas and degrade resources.*

Allowing operation of the golf course to continue with holes adjacent to the river and in its floodplain violates this policy.

Policy II.1 Integrity of State Park System Lands

This policy includes: “Land acquired for the use and enjoyment of the people according to the statutes governing the State Park System is classified for use and enjoyment by this and future generations....” To change the classification of approximately 95 acres of Washoe Meadows State Park would deny not only the current park users but also future generations of the use and enjoyment of the park.

It also states: “Land acquired for the State Park System shall be dedicated to public use and managed in accordance with its classification, the Public Resources Code, the Department’s adopted Resource Management Directives and as outlined in approved resource elements of general plans.”

<sup>19</sup> [http://www.parks.ca.gov/?page\\_id=22338](http://www.parks.ca.gov/?page_id=22338)

Changing of the use of State Park System lands from how they were classified and planned is discouraged and can only occur with the concurrence of the State Park and Recreation Commission.

**Policy II.2 Classification and Naming Units, Features, Groves, and Trails of the State Park System (Amended 5-4-94)**

This policy indicates that the classification and naming process are expected to result in a permanent name and classification for the California System park unit. This and other policies together emphasize the fact that it is unusual to change unit classifications, especially a case where the classification is downgraded to one of lesser protections.

Reclassifying 95 acres of Washoe Meadows State Park would be inconsistent with these policies.

Recently, reclassification of Tolowa Dunes State Park lands was cancelled and replaced with a process to produce a comprehensive general plan for the park in which reclassification will be one of the alternatives.<sup>20</sup> It was reported that this proposal to ease protection of park land by reclassification was apparently unprecedented.<sup>21</sup>

In Washoe Meadows State Park, the classification of the land as state park should continue in order to allow management of the natural and cultural resources in this area for their protection and the preservation of the park's important resource values.

The unique ecological natural resources and cultural resources of Washoe Meadows State Park should be protected by State Parks and not traded away in favor of development.

**Policy II.4 Preservation of Vegetative Entities**

This policy indicates that State Parks should acquire and preserve outstanding examples of native California species. It also states that they should acquire and perpetuate significant natural plant communities, associations, and examples of rare, endangered, endemic, or otherwise sensitive native California plants, as indicated on state and federal lists.

Rare and sensitive plants exist in the fens and spring complexes of Washoe Meadows State Park. Having a golf course development next to, or surrounding, any of these sensitive and uncommon botanical communities, is contrary to this policy. Indeed, as proposed in Alternative 2, the fen's partial outfall, which dumps into the un-restored portion of the quarry and is already reestablishing a peat association, would become part of the golf course.

**Policy II.5 Wildlife Management in Units of the State Park System**

This policy indicates that one of the purposes of the State Park System is to protect "native wildlife in a natural status within State Park System unit boundaries." Transformation of park land to golf landscape, essentially a monoculture, is counter to this purpose.

AOB31-7  
cont.

<sup>20</sup> California Department of Parks and Recreation News Release, September 23, 2010.

<sup>21</sup> The Crescent City Triplicate, September 20, 2010, "State Parks to weigh dunes hunting plan"

Policy III.1 Planning

This policy indicates the importance of determining the extent of need for recreation in the context of long-range objectives. State Parks periodically conducts surveys to determine current and future recreational trends and needs. These surveys are consistent with outside agency surveys which indicate the trend for more family-oriented natural, interpretive and educational recreational experiences compared with a declining sport with less diverse appeal, such as golf. Alternative 2 is counter to this trend.

Policy III.6 Development of Facilities within State Parks and State Seashores

This policy includes: "the facility will be compatible with natural and historical resources and historical periods identified in the unit's general plan and should be designed to contribute to the enjoyment of the natural and cultural resources." Even though Washoe Meadows State Park doesn't have a general plan, the park's purpose statement highlights preservation and protection of the park's natural and cultural resources (e.g., Washoe cultural history and evidence of the early years of development of the Lake Valley area, such as the dairy complex). Constructing a golf course within Washoe Meadows State Park, as in Alternative 2, would conflict with this Purpose Statement.

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Policy III.7 Conflicting Recreational Use

If the Commission finds that a specific recreational use is damaging to the unit's natural or cultural resource values or to the health, safety, or welfare of visitors, it shall be re-evaluated and may be restricted. The golf course has a 26-year history under State Parks stewardship. During that time the golf course and bridges have continued to damage the LVSRA natural resources by continued operation of golf course holes on the banks of the Upper Truckee River and within its flood plain to the point that a major river restoration is required. Moving the golf holes to Washoe Meadows State Park would continue the damage to the resource values of the park and should not be allowed.

The EIR/EIS/EIS fails to adequately address these issues with Alternative 2 and the States Parks Policies.

**Conflict with State Parks Planning Handbook**

The State Parks Planning Handbook (Handbook)<sup>22</sup> establishes procedures for adopting and amending general plans for state park units.

A question raised for several years<sup>23</sup> is whether State Parks is following state law and its own procedures in the proposed approach for boundary "trading." A simple review of the guidance in the Handbook indicates the legal vulnerabilities associated with this approach.

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Needed Correction to the Record.

<sup>22</sup> State Parks Planning Handbook, April, 2010.

<sup>23</sup> Refer to the WMC NOP Scoping Comments, in Vol. III of the EIR/EIS/EIS.

In each alternative description, in the Summary and the primary document, there are references to a “General Plan Litigation Settlement,” related to the Lake Country Estates parcels that ultimately were classified as Washoe Meadows State Park and LVSRA. It was not a general plan litigation settlement—it was a litigation settlement between Lake Country Estates, Inc. and the TRPA. A 956-acre development of nearly 3,000 units was denied approval by the California TRPA (TRPA’s predecessor) in 1972 because the project would have substantially modified the environment through “mechanical” drainage from the meadow. The settlement indicates allegations that CTRPA targeted the property for acquisition as wildlife habitat and imposed restrictions to prevent development and depress the property value, resulting in the 1977 lawsuit.

The 1988 LVSRA General Plan presents an important and relevant history of the acquisition of Washoe Meadows State Park and LVSRA:<sup>24</sup>

“The land acquisition process that resulted in the establishment and classification of the Lake Valley SRA began with acquisition of the Lake Country Estates project by the Wildlife Conservation Board (WCB) in 1984. The acquisition is described in Chapter 1470 of the 1984 statutes (SB 1374, Johnson)... which appropriated the sum of \$5,697,000 for acquisition, restoration, and maintenance of the property.”

This land was transferred by the Wildlife Conservation Board to State Parks in January, 1985.

The August 6, 1985, State Parks memo from James Doyle, Assistant Chief of the Resource Protection Division, to David Schaub, Supervisor of the Natural Heritage Section, directed exploration of a variety of alternatives for the property, including transfer of the golf course to others and designation of the entirety of the 777 acre acquisition area as a State Recreation Area. It was after great analysis and coordination with the public that the Commission, on March 23, 1987, classified and named two separate and distinct state park units: Washoe Meadows State Park, approximately 627 acres<sup>25</sup> and Lake Valley State Recreation Area, approximately 150 acres.<sup>26</sup>

The official Land Ownership Record maps Washoe Meadows State Park with a boundary that has never been changed. The Land Ownership Record for LVSRA has expanded four times through three private acquisitions and a fourth acquisition from another state agency. There have been no adjusted boundaries between these units.

#### Proposed General Plan Amendment Strategies

While Alternative 1 proposes no general planning actions, all other alternatives do.

Alternative 2 outlines preparation of an “Interim Management Plan” for Washoe Meadows, because there is no general plan for the unit.<sup>27</sup> It is proposed for Washoe Meadows to “enhance accessibility for the broader public” including trails, interpretation, and small

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<sup>24</sup> Page 33.

<sup>25</sup> Resolution 18-87.

<sup>26</sup> Resolution 17-87.

<sup>27</sup> Pages 2-56/57.



parking area(s). (There are inconsistencies within the alternative as to the number of parking areas and spaces within them.) Alternative 2 also proposes realigning the boundaries between the units, removing “nearly all” the river zone from the SRA and placing it within Washoe Meadows. In “trade,” a similarly undisclosed number of acres of the Park would be used to place nine holes of the golf course, requiring “substantial” tree removal and including 32 acres of turf, a 1.6 acre pond, and a new 650 square foot restroom facility. The document states that the park boundary revision would require a general plan amendment to the LVSRA General Plan, which would also modify the LVSRA river protection goals and policies. Details of the map and text amendments would come after identification of the preferred alternative, to be “submitted with the completed EIR/EIS/EIS to the Commission for consideration of approval at the conclusion of the environmental review process.”

Alternative 3 also outlines preparation of an “Interim Management Plan” for Washoe Meadows State Park because there is no general plan for the unit.<sup>28</sup> It is proposed to “manage Washoe Meadows State Park in a manner consistent with its purpose.” It would also “enhance accessibility for the broader public” including trails, interpretation, and small parking area(s). This alternative views it as “necessary” to adjust the boundaries between Washoe Meadows State Park and LVSRA, shrinking the size of the “SRA boundary to fit the smaller golf course.” It does not describe how this will be accomplished procedurally, but in a separate paragraph notes that the LVSRA General Plan “calls for an 18-hole regulation golf course,” necessitating a general plan amendment to “allow for development and management of the reduced play golf course.”

Alternative 4 mimics the language of Alternative 3 regarding the Interim Management Plan for Washoe Meadows State Park.<sup>29</sup> It proposes no boundary adjustments between the units; however, it indicates that amendments are required because the natural channel contemplated in the LVSRA General Plan would not be accomplished.

Alternative 5 does not propose an Interim Management Plan for Washoe Meadows State Park.<sup>30</sup> It indicates that the LVSRA General Plan would be revoked and that the land would be reclassified to become part of Washoe Meadows State Park. If significant future permanent facilities were proposed, a new general plan would be prepared. It also indicates that if an 86-acre, nine-hole course would be “temporarily” retained during river restoration and state park general planning, the boundaries would remain unchanged until a decision was made about the future disposition of the park units. What is the duration of “temporary” in this case?

The 2006 Notice of Preparation for the project and the purpose, need, and objectives in the EIR/EIS/EIS all describe a river restoration and golf course development project. Yet, the detail provided for Alternative 2 and summarized above (but not delineated in any other alternative) describes a general plan amendment with the decision by the Commission.

<sup>28</sup> Page 2-75.

<sup>29</sup> Page 2-90.

<sup>30</sup> Pages 2-104/105.

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cont.

How does what is proposed fit with the State Park's standard planning path? Who is the decision maker on the document on behalf of State Parks?

From the description in the NOP, it appeared that this was a Specific Project Plan,<sup>31</sup> which is a detailed implementation plan needed to accomplish a specific project. The Handbook indicates that some specific project plans should not proceed without first having a Management Plan in place, using the example that a visitor center should only be built based on an interpretive management plan. A multi-million dollar river restoration proposal should be based in a River Management Plan, but in the EIR/EIS/EIS<sup>32</sup> we learn that the February 2000 River Management Plan obtained through a Public Records Act request was a "draft internal study" to provide "informal guidelines" that was never completed, not formally adopted, not reviewed under CEQA, and that the "effort was terminated." Instead, other studies conducted the more detailed analysis that provides the "foundation information for developing river restoration concepts of the proposed project."

Consequently, rather than follow the Management Plan process outlined in the Handbook, an alternative process provided the guidance for this project. Unlike the process for Management Plans, this alternative process was not subject to CEQA and the public scoping and comment process it would have entailed. In addition, the State Parks review process for Management Plans was not followed. If this had occurred, the public controversy over the proposal and its irreversibility and magnitude, concerns about Public Resources Code requirements related to general plans, and adherence to State Parks planning policies could have been transparently vetted.

It's indisputable that a golf course is a substantial development of a facility that is inconsistent with the definition of a State Park. The argument in the EIR/EIS/EIS that only a simple boundary line amendment is proposed between park units and that only an amendment to the LVSRA General Plan is required from this action is not valid.

There is still the chicken or egg question related to the planning process proposed to be employed. What is the initial decision: the specific golf course and restoration project or the general plan amendment? "General plans are reconsidered for amendments or revisions when circumstances or needs dictate, such as additional land acquisitions and/or substantial development considerations that were not addressed in the general plan."<sup>33</sup> The EIR/EIS/EIS has not made a statement why a general plan amendment is needed when other suitable alternatives (3 or 5) exist

The Land Use Section of the EIR/EIS/EIS draws conclusions that require clarification. Impact 3.2.3, Potential Conflict with State Parks Plans, Policies, or Regulations, is flawed. Golf course recreation is more than just "better suited"<sup>34</sup> to a SRA than a State Park; it is not allowed within state parks units classified as state parks. The general Plan consistency determination discussion for the LVSRA is contrary to its multifaceted Declaration of Purpose Statement which includes "restoring the Upper Truckee River, protecting its water

<sup>31</sup> Handbook page 155.

<sup>32</sup> Page 3.2-3.

<sup>33</sup> Handbook page 17.

<sup>34</sup> Page 3.2-15.

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cont.

quality, and protecting and interpreting significant natural, cultural, and scientific values.” The same Declaration of Purpose discusses an “18 hole” golf course, not a regulation course as stated in several places in the EIR/EIS/EIS. The Stream Management Sensitivity Zone within the SRA includes a policy that calls for special management actions which includes “restoration of natural stream configuration.” In fact, the Stream Management Sensitivity Zone was supposed to increase to more than 70 acres as a result of general plan implementation. Nowhere does it say that restored stream should be transferred to another State Park unit. The statement that a simple land transfer between Park units keeps them “whole” in terms of acres neglects to mention that, under the existing general plan policies, the riverside land in question should have already been protected from disturbance within the boundary of the SRA. Adding these acres to Washoe Meadows is contrived to make it seem like nothing has changed, when in fact the restoration should have occurred through general plan implementation. The addition of golf course acres in the State Park unit is indeed a negative effect, and may have increased the development capacity of the Lake Tahoe region, in conflict with the TRPA’s Regional Plan.

The statement in the draft EIR/EIS/EIS that “consistency with a general plan is, therefore, not an issue, because a Washoe Meadows SP plan does not exist” draws such an intriguing conclusion. It is not an issue with consistency with the general plan that doesn’t exist, but instead a requirement of the PRC that such planning be conducted for the park unit as a whole prior to an irrevocable commitment of its resources.

Further, the significant conclusions drawn in the analysis assume a general plan change has already been adopted “because land uses in the study area would be consistent with the revised unit boundaries and these amendments would require approval by the Commission, implementation of Alternative 2 would be less than significant.” This preempts the primary Commission discretionary decision to be made regarding the general planning process (raised by WMC and others in the public scoping process) in a sweeping statement of presumption of approval. If the Commission concurs instead with the WMC in not changing the boundaries, the conclusion of a less than significant impact would not be substantiated and implementation or approval of Alternative 2 could not proceed.

It would be counter to the Parks planning process to make any decision selecting Alternative 2 for implementation ahead of the Commission’s actions on a general plan amendment and determination of whether the proposed amendment strategy conforms with the Public Resources Code regarding improper commitment of resources ahead of general planning for Washoe Meadows. Even a “conditional” approval, pending action by the Commission would be procedurally flawed without disclosure of a significant unmitigatable environmental impact and a Statement of Overriding Considerations.

While we highlight the flaws associated with Alternative 2, we highly recommend that the land use conclusions for each alternative be reviewed for consistency with State Parks’ planning policy and CEQA requirements.

Similarly, for the other lead agencies—the Bureau of Reclamation (under NEPA) and TRPA (under the Compact)—to make a decision on an alternative ahead of the applicant, which elected to not identify a proposed action among the five alternatives considered in this

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document, would be an inconsistent and unusual way for a regulatory or funding agency to operate.

Rather than honor the Purpose Statements of the two park units, river planners became golf course and budget planners and reduced park-purposed acreage, instead of valuing the sense of place associated with each acre within the designated boundaries. Improving the golf course "layout, infrastructure, and management" and maintaining its quality of play as well as revenues were part of the project's original objectives in the NOP. Has the Planning Policy and Programming Committee (PPPC) been consulted on this matter?

The environmental document presumes that a general plan amendment is adequate for processing the changes to the boundary and policies being contemplated under Alternative 2. We suggest that the item be considered "potentially controversial" and that the changes and their magnitude could be fairly argued to warrant a general plan revision for the LVSRA.<sup>35</sup>

We do not raise this same argument for the amendments being contemplated under other alternatives. However, for Alternative 3, which also proposes a boundary amendment, we must ask why it is presented in the EIR/EIS/EIS as "necessary" to correlate a boundary adjustment with Washoe Meadows State Park into its description. The Declaration of Purpose for the LVSRA has since its inception in 1988 incorporated "the scenic Upper Truckee River and its environs." Over 70 acres of streamside Management Sensitivity Zone, outside of the golf course, had been planned for the unit under its General Plan. It is unclear why the specter of the boundary question needs to be raised, although adding land to a State Park unit without a general plan in place is certainly different than removing land from it.

The WMC has reviewed the Handbook in light of its direction specific to unit boundary adjustments. All references to boundaries contemplate those related to internal sub-classifications and boundary changes associated with acquisitions that are thus park expansions. Adjustments between disparate park units with different classifications and general plan status are not specifically mentioned. Boundaries matter and the general plan obligation is the roadmap for State Parks to honor in its planning processes and policies before making irrevocable commitments of its resources through a boundary adjustment.

The Handbook directs sub-classification areas to "establish an area boundary that encompasses the significant resources and provides an adequate buffer from adjacent land uses. The size of the area should be large enough to provide effective resource management." Yet, the maps never depict the boundary of the area proposed to be usurped from the park into the SRA. Instead, colorful depictions of the areas of the golf course footprint are shown,<sup>36</sup> yet Exhibit 2-7 depicts the use of "existing trails" shown on Exhibit 2-5 as haul routes. These lie outside of the golf course footprint, presumably within what would remain of Washoe Meadows State Park. The proposed "trespass" into Washoe Meadows places these construction routes and the responsibility for golf course buffers for holes 9, 10, 11 and 13 outside of the SRA. The park is given the responsibility to absorb the

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<sup>35</sup> Handbook page 152.

<sup>36</sup> Exhibit 2-5.

impacts of construction and golf course use. This is an unacceptable impact to the integrity of the Park and is contrary to Handbook direction. It artificially contrives the golf course boundary adjustment to seem smaller than the area of actual effect and exaggerates the restoration benefit. This occurs adjacent to some of the most special resources of the park, including Washoe Meadow itself, the fen, and the Upper Truckee River and its floodplain.

The concept of creating an "Interim Management Plan" for Washoe Meadows (Alternatives 2 -4) is also not defined in the Handbook. Appendix C of the Handbook describes Interim Guidelines (or Interim Management Guidelines), in order to provide direction and guidance to staff. They can only result in "no development" and are consequently not subject to CEQA, but must be approved by the PPPC. They are neither projects nor proposed plans, so it's unclear how parking facilities could be contemplated as stated in the EIR/EIS/EIS. The Handbook simply does not provide the option of an "Interim" Management Plan. It is impossible to evaluate what is contemplated in the EIR/EIS/EIS in light of the planning processes outlined in the Handbook.

Alternative 5 adds to this planning process confusion. It contemplates a potential scenario whereby the river is initially restored with the ultimate end that the LVSRA General Plan would be revoked and that the land would be reclassified to become part of Washoe Meadows State Park. It also indicates that if an 86-acre, nine-hole course would be "temporarily" retained during river restoration and state park planning, the boundaries would remain unchanged until a decision was made about the future disposition of the park units. This scenario further complicates the chicken or egg question. As proposed it seems to envision a project similar to one permutation of Alternative 3, which independently would require a LVSRA General Plan amendment pursuant to what is described under that alternative (because it would no longer be an 18-hole regulation course). The planning process for this alternative doesn't appear to have been thoroughly thought through and should be clarified.

The EIR/EIS/EIS fails to adequately address conformance with the State Parks Planning Handbook.

#### **Federal Funding Processes**

The Bureau of Reclamation (Bureau) stated in a 3/15/10 email from the NEPA Coordinator:

*"Although at this time, Reclamation has not committed funds for construction, a joint NEPA and CEQA document is being prepared in the event that federal funding becomes available for this project. In any event, Reclamation would not provide funding for the golf course relocation aspects of the project, should that occur."*

However, the Bureau provided a grant to State Parks for "preparation of conceptual designs and the environmental impact document." The project title was "Upper Truckee River and Wetland Restoration in the Lake Valley State Recreation Area."

This funding has apparently been used for golf course design and evaluations in Washoe Meadow State Park as well as the Lake Valley Recreation area. Is this a proper use of Federal funds?

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AOB31-9

## Plans, Policies, and Procedures | 1

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The EIR/EIS/EIS fails to adequately address this issue with an apparent failure to adhere to Federal Policies and Procedures.

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## 2 Comparison of WMC's Recommendations in NOP with EIR/EIS/EIS

On October 6, 2006, the WMC filed comments on the Notice of Preparation (NOP) for the Draft EIR/EIS/EIS for the Upper Truckee River Restoration and Golf Course Relocation Project, Lake Valley State Recreation Area and Washoe Meadows State Park, Meyers, California.

The conclusions we drew were:

1. The NOP describes a project that is defined incorrectly and reflects a flawed project approach that will needlessly delay restoration of the River with consequent effects on the clarity of Lake Tahoe (Lake).
2. Unless the scope (including the goals/objectives and alternatives) of the EIR/EIS/EIS is significantly revised prior to initiation of the review, the results will be biased and the project subject to legal challenge.
3. Unless important new commitments to an open public dialogue are included in the lead agency processes it is unlikely that any project reflecting community and stakeholder consensus will reach implementation in a timely manner.
4. Completion of the project as described in the Preferred Alternative would have significant, irreversible impacts on Park and River resources.
5. Implementation of either Alternative 1 or Alternative 2 would be inconsistent with:
  - the 1984 statute which authorized acquisition of lands now categorized and named Units 382 and 390 of the California state park system;
  - California Parks and Recreation Department (CDPR) planning, regulation and statutes; and
  - the mandate of the Tahoe Regional Planning Agency (TRPA) contained in statute and adopted goals, plans and thresholds.

AOB31-10

The remedies requested as a result of the scoping process were:

1. revision of the project description to be *Upper Truckee River Restoration*;
2. revision of the project goals and objectives to eliminate ones related to championship golf and golf course revenues;
3. redefinition of the alternatives to address the full potential for restoration and for multiple configurations of the golf course within the boundaries of the Lake Valley State Recreation Area (LVSRA);
4. addition of an alternative that would evaluate relocation of the entire golf course
5. establishment of an independent panel of experts to review and advise staff and decision-makers on the EIR/EIS/EIS;
6. establishment of a citizens advisory committee representative of all users and stakeholders of the Park to work directly with the agency staff and the consultant in preparation of the EIR/EIS/EIS;
7. initiation of an open public process, led by a professional facilitator consensus

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outcomes that can achieve timely restoration. For the 2010 workshops, the bias was so notable that the Lake Tahoe News made mention in a recent article:  
<http://www.laketahoenews.net/2010/10/trpa-gets-earful-on-river-project-at-golf-course-state-park/>.

8. broad and detailed review of all impacts, including those described in comments submitted by the public;
9. elimination of Park boundary adjustments from this process; and
10. allowance for filing of Supplemental Comments after the extended deadline, to allow review of documents requested under the Public Records Act.

The remedies as manifested in the Draft EIR/EIS/EIS:

1. The project was not redefined as *Upper Truckee River Restoration*. In the EIR/EIS/EIS it has been modified slightly to the *Upper Truckee River Restoration and Golf Course Reconfiguration Project*. (Underscore added.)
2. Project goals and objectives were revised to eliminate ones related to championship golf. The EIR/EIS/EIS now calls for maintaining "adequate" golf course revenues.
3. Alternatives were revised to address the full potential for restoration and for alternative configurations of the golf course within the boundaries of the LVSRA on the east side of the river. However, there was a failure to identify a satisfactory array of feasible options. In addition, options for layouts for an 18-hole golf course on the east side of the river were not provided in detail or with configurations that would demonstrate adequate review of optimized options. Also added was consideration of other locations for the golf course but these other locations were dismissed from consideration. Our detailed comments (see Section 4) describe the inadequacies of this analysis.
4. Alternative 5 was added. It would remove the entire golf course.
5. An independent panel of experts to review and advise staff and decision-makers on the EIR/EIS/EIS was not established.
6. A citizens advisory committee with representative of all users and stakeholders of the Park to work directly with the agency staff and the consultant in preparation of the EIR/EIS/EIS was not established.
7. An open public process, led by a professional facilitator, to seek consensus outcomes that can achieve timely restoration was not performed. Instead, State Parks conducted a process with consultants and facilitators clearly biased toward Alternative 2 (see Section 3).
8. A broad and detailed review of all impacts, including those described in comments submitted by the public, are the subject of the EIR/EIS/EIS. This set of detailed comments of the WMC addresses deficiencies in that review.
9. Park boundary adjustments were not eliminated from this process.
10. There was no allowance for filing of Supplemental Comments after the extended deadline, to allow review of documents requested under the Public Records Act. The

AOB31-10  
cont.



## Comparison of WNC's Recommendations in NOP with EIR/EIS/EIS

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documents supplied from these requests continue to be delayed, which has not allowed adequate review of the statements in the EIR/EIS/EIS.

AOB31-10  
cont.

Page 3 of 3

### 3 Public Recreation Planning Workshops in 2007

The Draft EIR/EIS/EIS<sup>37</sup> mentions "two public recreation planning workshops in 2007" as part of its demonstration of the effort to prepare the range of alternatives. Many members of WMC participated in these events. The workshops were held on February 8 and 9, 2007. In each workshop, there was an overall meeting facilitator from State Parks' consultant EDAW and additional facilitators from EDAW and other organizations for the break out session, entitled: "Group Planning Activities (Small Break-Out Groups)." The stated goal was: "To gather information about existing public access and use patterns in Washoe Meadow SP and Lake Valley Recreation Area and provide an opportunity for the public to help identify public access and resource protection features of this project."

During the meeting and break-out groups it was clear that there was a bias for Alternative 2. The Vice President of EDAW said during her summary, "It was our (the facilitators) job to get ideas on Alternative 2." She should have said: "It was our job to get ideas on options for alternatives." The other alternatives weren't mentioned. It was clear that the organization that hired by State Parks to produce an adequate EIR/EIS/EIS for the golf course relocation would not be objective in the presentation of the results of this public meeting.

The meeting and breakout facilitators were not neutral. They pushed participants to support Alternative 2 and repeatedly requested input for this alternative. In one case, the facilitator mentioned they were told to obtain comments on how Alternative 2 could be modified to be acceptable. In another case, the facilitator could not get anyone at the table to propose or agree to comments on Alternative 2 because the participants felt that Alternative 2, with its invasive golf course footprint in Washoe Meadows State Park, was not acceptable. The facilitator then wrote comments on the map of Alternative 2 where comments were to be recorded. One WMC member wrote on this chart that the facilitator, not the meeting participants, wrote the comments. We later asked for copies of these charts through a Public Records Act Request after the meeting, but we were denied access to them. This same "input," which the public did not have access to, was used to create the misrepresentation that the public was in favor of Alternative 2.

The two meetings were attended by many members of the public. However, the workshop was obviously designed to encourage people to show where and how they would locate golf in Washoe Meadows State Park, thereby obtaining what was later used as misleading "public input." Many participants objected to the exercise on the grounds that it went against what they believed in. There are many creative ways to design an 18-hole golf course without using park land, but the facilitator and the State Parks meeting leaders were uninterested in exploring them in these workshops.

These workshops were controlled in a way that did not allow full public input to modify or develop additional project alternatives in public meetings.

WMC's comments to the Notice of Preparation requested "an open public process, led by a professional facilitator, to seek consensus outcomes that can achieve timely restoration."

<sup>37</sup> Volume 1, Section 1.2, Page 1-6.

AOB31-11

The 2007 workshops were a poor example of such an open public process. The bias is so notable that the Lake Tahoe News mentioned it in a recent article.<sup>38</sup>

At the same meeting, State Parks personnel said that she had spoken with the Director of State Parks who indicated that if there are too many obstacles, the project would revert to the do-nothing alternative. This same conclusion has been expressed by other agencies and organizations, so this message has obviously been delivered in discussions to other agencies and the public. The State Parks intent to limit the outcome to alternative 1 or 2, however, was not disclosed in the draft EIR/EIS/EIS, which, under CEQA, requires full disclosure.

WMC's comments to the Notice of Preparation requested "an open public process, led by a professional facilitator, to seek consensus outcomes that can achieve timely restoration." The 2007 workshops were a poor example of such an open public process.

The EIR/EIS/EIS fails to adequately address these issues with the process for public input.

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cont.

<sup>38</sup> <http://www.laketahoenews.net/2010/10/trpa-gets-careful-on-river-project-at-golf-course-state-park/>

## 4 Evaluation of Alternative Locations

As requested by the WMC and the public, the Draft EIR/EIS/EIS examined alternative locations for a golf course.<sup>39</sup> The evaluation of Alternative Locations for the golf course is inadequate because:

- siting criteria development was flawed, and
- application of the siting criteria was inconsistent.

### Siting Criteria Development

This section and the section on Method of Evaluation list many people involved with the criteria development and evaluation of potentially feasible alternative locations for Lake Tahoe Golf Course. However, no real estate agent is listed. A real estate professional, in particular an expert in commercial or large parcels, could have helped with those criteria and with identifying alternative sites and their owners and agencies. It also would have been valuable to engage an appraiser to review any information received from a real estate professional. The result was that the development of siting criteria<sup>40</sup> was flawed.

AOB31-12

### Application of the Siting Criteria<sup>41</sup>

#### Public Ownership Criterion

The elimination of consideration of private property is an unjustified omission:

1. State Parks purchases land every year for public use. In the 2006/2007 fiscal year, State Parks acquired 8,336 acres of land worth \$48,015,600.<sup>42</sup> In the 2005/2006 fiscal year, 5,333 acres were purchased by State Parks.<sup>43</sup> In addition, State Parks has negotiated for donations of some of the land value. The agency has also obtained donated funds for private land acquisitions. The EIR/EIS/EIS fails to explain why purchase of private property is infeasible. A purchase of private land should have been considered.
2. Real estate values are at historical lows. Many more options for golf course relocation could have been identified and the selection narrowed for detailed evaluation.
3. The economic analysis was not broad enough. It didn't include evaluation of purchase of private property in the analysis for the economic feasibility of the

<sup>39</sup> Volume 1, Section on Alternative Locations for the Golf Course p 2-15-22.

<sup>40</sup> Page 2-15.

<sup>41</sup> Page 2-16 Table 2-2.

<sup>42</sup> Annual Report to the Governor on the California State Park System, California State Park and Recreation Commission, 2006-2007

<sup>43</sup> Annual Report to the Governor on the California State Park System 2005-2006, California State Park and Recreation Commission

various alternatives, which could have been feasible and would have changed the economic analysis appended to the EIR/EIS/EIS.<sup>44</sup>

#### Use Allowance Criterion

The description states that the property use as a golf course must be consistent with various documents and rules including "property acquisition purposes." This criterion is then applied to eliminate consideration of the Upper Truckee River Marsh because the site was purchased for the purpose of restoration and "development of a golf course on this site would not be consistent with the purpose for which the property was purchased." If so, this criterion should preclude golf course development on the undeveloped Washoe Meadows State Park, because the development of a golf course is inconsistent with the purpose for which the property was purchased as described in the settlement agreement and legislation that authorized the purchase of this land.

This restoration criterion is used to eliminate the property across U.S. 50 from further consideration, because the site "is planned for restoration." It says: "Development of a golf course would not be consistent with the proposed restoration." Washoe Meadows State Park has many areas where restoration has occurred and where further restoration is needed. This criterion is being arbitrarily applied to eliminate certain off-site alternatives, while ignoring the development of a golf course on the west side of the Upper Truckee River on restored areas within Washoe Meadows State Park.

AOB31-12  
cont.

#### Topography Criterion

The criterion specifies that slopes be 20% or less throughout the area used to develop a golf course, although small areas of steeper slope can be accommodated. Some relocated golf holes of Alternative 2 don't meet this criterion because much of the area where the golf course would be relocated in the park has slopes greater than 20%. On-site measurements indicate a substantial area of slopes of greater than 20% in the area of involving the proposed locations of fairways and greens for holes 9, 10, 11 and 12. Yet, the use of this criterion eliminated some options such as the undeveloped land at the Lake Tahoe Community College.

The Tahoe Paradise Golf Course Area was also eliminated from consideration due to the topography and public ownership criteria.

Consultation with a professional real estate agent would have assisted with both the siting criteria development and application of the siting criteria.

The evaluation for alternate siting for the golf course is part of an apparent pattern of narrowing the required reasonable range of feasible alternatives so that only Alternative 2 appears feasible.

Correction needed: The draft EIR/EIS/EIS<sup>45</sup> says, "The residential areas to the east, west, and south of the study area are known as Country Club Estates." They are not; Country

<sup>44</sup> Volume III, Appendix E.

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Club Estates is the area on the east side of the river. The area west and a portion of the area south of the study area are known as Mountain View Estates and a portion of Tahoe Paradise.

AOB31-12  
cont.

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<sup>45</sup> Volume 2 page 3.15-3.

## 5 General Comments

### Introduction

The Washoe Meadows Community (WMC, or Community) consists of hundreds of citizens of California and patrons of the park. WMC has supported restoration of the Upper Truckee River through Washoe Meadows State Park and Lake Valley State Recreation Area.

However, we have reviewed the Draft EIR/EIS/EIS titled Upper Truckee River Restoration and Golf Course Reconfiguration Project and find many issues.

It appears that a majority of EIR/EIS/EIS effort was used for Golf Course design, which was done in great detail, at the expense of the actual environmental evaluations required to meet CEQA requirements.

The document is written in a way that links river restoration with the development of a golf course. Linking these two activities has resulted in flawed analysis. Since the NOP four years ago, State Parks has indicated that Alternative 2 was the preferred Alternative. However, the EIR/EIS/EIS has no preferred Alternative, even though State Parks has shown its support of preferred Alternative 2 at many meetings.<sup>46</sup> State Parks also arranged for public speakers to advocate for Alternative 2. State Parks even held private meetings at the golf course advocating golfers to send letters in support of Alternative 2. State Parks' support of Alternative 2 should have been disclosed in the EIR/EIS/EIS to allow public comment. Masking the true intent for a preferred Alternative 2 is misleading and improperly diffuses the interest the public would have in the EIR/EIS/EIS.

AOB31-13

We have heard in public meetings and in meetings with other involved agencies and organizations that State Parks will not restore the river unless the golf course is expanded into Washoe Meadow State Park. However, these statements of intentions were not disclosed in the draft EIR/EIS/EIS. CEQA requires full disclosure of the developer's intentions and this has not been provided, violating the transparency and due process of the EIR/EIS/EIS. We agree that the River restoration is important, but strongly oppose Alternative 2, which has been propped up by misrepresented facts, improper public process, and the unnecessary linking of river restoration and golf reconfiguration. Alternative 3 provides the best balance of environmental restoration and economics.

The following sections provide comments on the EIR/EIS/EIS. Many assertions are incorrect; many things are inadequately analyzed; and many things are missing.

<sup>46</sup> E.g., the Meyers Round table, LTUSD school board meeting, and the Soroptomists.

**Land Use**

Alternative 2 would bracket the river fully for the entire length that it is owned by the state, on either the west or east side by a golf course. This is contrary to the stipulation in the original lawsuit that committed the state to protect the land in perpetuity. It would reduce the access to and enjoyment of the river by Park users. The sights and sounds of golf and the maintenance and upkeep of the course would be often within 100 feet of the river. AOB31-14

Alternative 2 also increases the yardage of the current golf course. Hence, it is an expansion of a golf use at the expense of natural wild habitat in Washoe Meadows State Park. AOB31-15

Washoe Meadows State Park includes a variety of resources: wet meadow, Jeffrey pine, lodgepole pine, Native American occupancy sites, and remnants of a historic dairy. The land use maps used for the analysis are incorrect. One area near proposed holes 6, 7, and 13, is listed as dry meadow; it is a wet meadow with standing water, downhill of an SEZ. In another area, Alternative 2 proposes grading above and below a sensitive wetland area with no apparent consideration of the effects of this change in hydrology. AOB31-16

The EIR/EIS/EIS suggests campgrounds for Washoe Meadows State Park. The Lake Country Estates Project Resource Summary<sup>47</sup> states: *"the soils in Lake Country Estates pose severe constraints to constructing roads, buildings, and campgrounds."* The EIR/EIS/EIS does not factor this information in to the evaluation of Alternative 2 and its needed cart paths, and restroom facilities. The EIR/EIS/EIS has not gone into the depth required to evaluate this sensitive parcel of land for these proposed uses. AOB31-17

State Parks is promoting the golf course as "Audubon" certified. It has been certified by Audubon International, an organization formed by the golf industry to help golf courses be better environmental stewards and to market a better image for golf. Presentation of this information in public meeting by representatives of the State Parks is misleading and represents yet another case of bias towards Alternative 2. AOB31-18

Alternative 3 would establish a better geomorphically-functioning channel that would allow for improved groundwater recharge, nutrient catchment, and wildlife habitats. Alternative 3 would reduce the size of the golf course footprint and increase the area of restored riparian area. The boundary of WMSP would be adjusted to encompass all of the restored river and riparian corridor. Alternative 3 would decrease golf landscape adjacent to the river and decrease irrigation and fertilizer use. Alternative 3 would increase the area of WMSP available for low-density use. AOB31-19

Relocating golf course holes as proposed in Alternative 2 would remove and fragment upland habitat, bisect wildlife habitat and increase disturbance levels west of the Upper Truckee River. A road built all the way around Lake Tahoe prevents animals from safely navigating to that annual water source. The Upper Truckee River habitat has already been compromised with many roads and developments that have eliminated habitat and prevented animals from safely reaching an annual water source. The Upper Truckee River and Angora Creek result in a merger of two natural wildlife corridors. Leaving a 100-foot AOB31-20

<sup>47</sup> February 1987, p. 12.



strip along the river is not sufficient to maintain a wildlife corridor. Bisecting this habitat with managed turf and golf cart pathways is a significant environmental impact. AOB31-20  
cont.

Alternative 2 would hinder access and diminish the park experience. The additional buffer required around the golf course required for safety is not considered in the coverage or in the negative impacts for Alternative 2. The 1.4 miles of designated trails in the park either would border the golf course or cross through the golf course, eliminating quiet open space for wildlife viewing. AOB31-21

State Parks has taken many actions in preparation for the golf course in advance of the EIR/EIS/EIS and without a general plan for Washoe Meadow State Park. The agency:

- 1) brought in a large dirt pile in 2007 in an area it describes as disturbed.
- 2) logged the area where the new bridge is planned for Alternative 2 as part of the East Meadow "Dead Tree Removal" project in 2009.
- 3) put in a new well and pump with sufficient size to support the new golf course.
- 4) logged the river bank area to improve views directly adjacent to the proposed location of the golf course.

AOB31-22

These and other Park resource-affecting actions were done without a general plan (or any other plan) and without due process that could engage the public in the affairs of the Park.

The EIR/EIS/EIS does not adequately address these issues and does not adequately address the impact of the proposed change in land use for Alternative 2.

**Earth Resources**

For Alternative 2, a new bridge and restroom with sewer connection would be constructed. This would involve modifications where shallow groundwater occurs and where tree removal would be extensive. It would impact areas mischaracterized as dry meadow (really, a wet meadow), and grading would occur on slopes greater than 20% and directly above and around a sensitive wetland area (holes 9, 10, 11, and 12). Given the nature of the sedimentary soils from the historical meanders of the river, tree removal could cause instability in soils. AOB31-23

This is not adequately addressed in the EIR/EIS/EIS.

**Scenic Resources**

Alternative 2 would require substantial grading to modify the terrain for the golf holes, substantial removal of existing trees, and construction of golf facilities in the existing forest. In Alternative 2, approximately 1,640 trees of greater than 10-inches DBH would be removed, changing the views from points within the park from forested to more open views of golf course tees, fairways, greens, bunkers, cart paths, and a restroom near hole 9. The layout for the relocated holes would result in removal of three trees greater than 30-inches DBH. The view into the Park from nearby streets such as Chilicothe Street, Normuk Street, and Delaware Street, and also from Grizzly Mountain, would be greatly altered. AOB31-24

There would be a substantial change in views from existing trails within Washoe Meadows State Park. These views would change from dense forest to more open views and golf course tees, fairways, greens, bunkers, and cart paths irrevocably changing the experience for other recreational pursuits in Washoe Meadows. This impact would be significant and impact the current park users.

AOB31-24  
cont.

The EIR/EIS/EIS minimizes these issues, rather than addressing the impact and significance.

**Biological Resources**

The existing disturbed wetland on the floor of the quarry,<sup>48</sup> which would be restored under Alternative 2, is hydrologically connected to and receives drainage from the large fen to the west via a small rivulet as well as being fed by groundwater. Although Alternative 2 purports to avoid the fen, it unaccountably circles a sensitive wetland area. The grading for the golf course could alter the groundwater or surface water hydrology. Drainage from the fen could increase and cause the fen to become drier if landscape alteration down slope of the fen modifies groundwater flow. These risks are not accounted for in the EIR/EIS/EIS nor the layout of the proposed golf course of Alternative 2.

AOB31-25

Common wildlife species would be disturbed by operation of the golf course through increased and regular human intrusion in the area between the Upper Truckee River and the neighborhoods to the south and west. Increased golf use of this area would reduce the habitat value for wildlife. The mix of forest, meadow, and riparian habitat in this block of open space, within the context of the larger complex of open space or low-density development to the north and south of the study area, provides a potential habitat link within the Upper Truckee River watershed and the Tahoe Basin.

AOB31-26

Alternative 2 promises to use the latest techniques to minimize herbicides and pesticide intrusion in the upper Truckee River. However, as evidenced by the diesel spill leak in 2005, good techniques are not always successful.<sup>49</sup> Adding a golf course of any kind to an area that is currently natural wildlife habitat poses an unnecessary and undue risk to the environment, the rivers, and waters of Lake Tahoe. The current water monitoring practices which, only monitor one time per year, are inadequate to prevent problems and protect the watershed. Mitigation for Alternative 2 needs to include additional monitoring and the expense for this must be factored into the economic analysis.

AOB31-27

Alternative 3 would have a net decrease of managed turf, resulting in less water use, less herbicides and pesticides, making it the better choice to meet the future needs of a climate that is targeted to be warmer with less water availability.

AOB31-28

The increased area of SEZ restoration and improved ecosystem functions of SEZ, floodplain, and wetland communities would be beneficial because they would result in a long-term net increase in the acreage of sensitive habitats. No construction disturbance related to golf course reconfiguration, quarry restoration, or trail development would occur on the west

AOB31-29

<sup>48</sup> The "quarry" is really a gravel pit.

<sup>49</sup> That spill resulted adding the monitoring of hydrocarbons by the Lahonton Regional Water Quality Control Board.

side of the Upper Truckee River under this Alternative; therefore, spring complexes (including fens) and other sensitive habitats west of the Upper Truckee River riparian corridor and floodplain would not be affected.

Areas of restored SEZ and floodplain would increase the area of suitable habitat for special-status plant species that have potential to occur within the area. Marsh skullcap, Oregon fireweed, and Bolander’s candle moss, discussed under Impact 3.5-4 (Alternative 2), have potential to occur in moist riparian habitats and would benefit from the long-term increase in this habitat type.

AOB31-29  
cont.

**Flawed range and description of alternatives**

The Public Resources Code<sup>50</sup> states that the “general plan for a unit serves as the guide for future development, management and operation of the unit.” There is no alternative that simply follows State Park’s commitment to what is written in its general plan, including consideration of its effects to public use and resources of Washoe Meadows State Park.<sup>51</sup> This would have been a reasonable alternative to consider.

The Plan identifies the following existing land uses:<sup>52</sup>

Zone	Acres	% of Total
OPEN SPACE/River-Stream	11.54	6.3%
OPEN SPACE/Undeveloped	55.67	30.7%
WETLANDS/Ponds-Drains	8.14	4.5%
<b>GOLF COURSE/Developed-Undeveloped</b>	<b>102.35</b>	<b>56.4%</b>
ENTRY-PARKING-CLUBHOUSE-MAINTENANCE	3.73	2.1%
State Recreation Area Acres	181.43	100.0%

AOB31-30

Proposed land uses in the general plan are:

Zone	Acres	% of Total
OPEN SPACE/Stream Management Sensitivity Zone	70.46	28.3%
OPEN SPACE/Undeveloped	37.79	15.2%
OPEN SPACE/Rehabilitated	32.44	13.1%
WETLANDS/Ponds-Drains	16.42	6.6%
<b>GOLF COURSE/Developed</b>	<b>86.42</b>	<b>34.8%</b>

<sup>50</sup> Section 5002.2.

<sup>51</sup> Pages 4 and 43.

<sup>52</sup> Page 72.

Day Use/Developed	1.28	.5%
ENTRY-PARKING-CLUBHOUSE-MAINTENANCE	3.73	1.5%
SRA plus Potential Ownership	248.54	100.0%

Alternative 1 is properly described as the CEQA baseline for the project, but misses the mark in describing whether the current golf course operates in conformance with its general plan, in place for over 20 years, and permits issued by regulatory agencies for its activities. While the CEQA baseline is rooted in the physical conditions actually existing at the time of environmental analysis, the public should have the benefit of understanding whether that is consistent with the commitments made by State Parks to the public through the general plan and its other operational permits, by such agencies as the Tahoe Regional Planning Agency and Lahontan Water Quality Board.

Analysis of the currently-operating groundwater well doesn't indicate whether the current ground water use for irrigation affects the surface water resources of the Upper Truckee. Is it: 1) an interconnected river and aquifer, with the river losing water to the aquifer, 2) an interconnected river in which the river is gaining water from the ground water, or 3) a perched river which is losing water to the aquifer? In the first condition river losses will increase in response to ground water pumping. In the second condition, river gains will decrease in response to ground water pumping. In either case, ground water pumping will result in a depletion or capture of surface water. In the third case, ground water pumping has no impact on surface water resources. Which condition exists and does it change at different times of year? Because Alternative 1 sets the environmental baseline for the project, it is important to disclose this information.

AOB31-30  
cont.

How do the 35 non-golf special events (banquets and weddings) fit under TRPA's permit for the golf course? The LVSRA General Plan? The concession contract? Could that be a contributing factor to the desire to pave 89 more parking spaces under Alternative 2?

Alternative 2 suggests that there is a mandate to retain an 18-hole regulation course that "requires" placement of the course in Washoe Meadows State Park. Alternative 3 echoes that theme with the statement that there is a need for a general plan amendment if it's converted to an 18-hole executive course. The Declaration of Purpose for LVSRA does not mention a "regulation" course:

*The purpose of Lake Valley State Recreation Area is to make available to the people for their enjoyment and inspiration the 18-hole golf course, and the scenic Upper Truckee River and its environs. The department shall balance the objectives of providing optimum recreational opportunities and maintaining the highest standards of environmental protection. In so doing, the department shall define and execute a program of management within the unit that shall perpetuate the unit's declared values, providing for golfing along with other compatible summer and winter recreation opportunities while restoring the natural character and ecological values of the upper Truckee River,*

*protecting its water quality, and protecting and interpreting significant natural, cultural, and scientific values.*<sup>53</sup>

For Alternative 5, we concur that the existing clubhouse and parking area are of community benefit for reuse. Ideas for reuse were presented in WMC's NOP comments. Some reasonable alternatives apparently were ignored. For all units of the California State Park System, "The Mission of the California Department of Parks and Recreation is to provide for the health, inspiration, and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources, and creating opportunities for high-quality outdoor recreation." The reuse of the building could be of enormous community benefit, from providing space for the long-envisioned Meyers Visitor or Interpretive Center, to a core facility for public access along the Truckee River as a greenway park potentially extending to the lake. A vision for the long-term public interest would make it a showpiece of the state parks system and the community. Instead, the alternative is treated unsubstantially and only the river restoration component is described. The possible "temporary" nine-hole course adds to the confusion about what's proposed.

AOB31-30  
cont.

**Preferred Alternative**

While the EIR/EIS/EIS maintains that there is no preferred alternative for the project, State Parks' pervasive marketing effort for Alternative 2 belies those claims. This marketing of Alternative 2 is contrary to NEPA and CEQA requirements for a comparable level of analysis among alternatives.

For example, at a recent public meeting, the State Parks consultant extolled the benefits of the links style course planned for Washoe Meadows designed by John Harbottle, who she indicated also designed the nearby Genoa Lakes course. Yet, it's undefined what the proposed course type is for Alternative 3. Someone who enjoys a nine-hole experience but eschews an executive 18-hole course could advocate for Alternative 3, yet be unsure of the ultimate outcome of what would be built. A very unequal effort went into the golf aspects of Alternatives 2 and 3.

AOB31-31

If Alt 5 is selected, what will happen on the ground? How will the golf course be removed and the meadow restored? It is unclear how this alternative complies with NEPA and TRPA requirements for comparable detail among alternatives in an environmental analysis. It appears that the statement by State Parks Senior Environmental Scientist in an October 6, 2006 letter to the TRPA APC and Governing Board is coming true: "It is likely that a 'No Golf course' alternative will be analyzed and discussed early on in the documents but may not receive the full evaluation afforded the more feasible alternatives that more closely match the department's vision for the project."

<sup>53</sup> Pages 34 and 35.

## 6 Environmental Planning

The draft EIR/EIS/EIS<sup>54</sup> indicates that “Under Alternative 3 the floodplain near the bridge proposed in Alternative 2 could be more fully restored than under Alternative 2...” This is a factor in favor of Alternative 3 over Alternative 2.

The draft EIR/EIS/EIS<sup>55</sup> <sup>56</sup> shows that Alternative 3 is clearly better than Alternative 2 due to:

- more acreage of Restored SEZ,
- more acreage of Restored 100-year floodplain/meadow,
- more acreage of Restored floodplain/meadow,
- less acreage of golf course within SEZ,
- less acreage of golf course within 100-year floodplain,
- less linear feet of golf course adjacent to the Upper Truckee River,
- fewer acres of managed landscape, and
- no bridges over the Upper Truckee River or Angora Creek.

AOB31-32

The draft EIR/EIS/EIS<sup>57</sup> says with regards to Alternatives 2, 3, and 5: “Implementing any of these three alternatives would also restore varied areas of floodplain and SEZ vegetation and soil conditions.” This confirms that the selection of Alternative 3 for previously described benefits would restore floodplain and SEZ areas.

The draft EIR/EIS/EIS<sup>58</sup> says that Alternatives 3 and 5 would decrease the sources of nutrient, sediment, or hydrocarbon pollutants to stormwater as well as reduce stormwater runoff.

From a land use planning perspective, it makes more sense to select Alternative 3 in order to optimize environmental benefits while still retaining the ability to have a reduced area 9- or 18-hole golf course. It avoids the undesirable impacts that would result from a golf course development within land that was set aside as a State Park for its conservation values.

Note: Environmental Planning comments provided per communication from: Robert A. Johnston, Professor of Environmental Planning, Department of Environmental Science & Policy, University of California, Davis.

<sup>54</sup> Volume 1 on page 2-7.

<sup>55</sup> Volume 1 Table 2-3 on page 2-25.

<sup>56</sup> Volume 1, page 2-74.

<sup>57</sup> Volume 2, page 4-8.

<sup>58</sup> Volume 2, page 4-9.

## 7 Economic Feasibility Analysis

The economic analysis for this project<sup>59</sup> takes a different strategy than those typically prepared for government agencies at Lake Tahoe. The threshold evaluations<sup>60</sup> and the Forest Service's Watershed Assessment<sup>61</sup> all describe a recreation/tourism economy based on a variety of recreational activities available in a superior setting. The latter study estimated annual visitation to the South Shore as 1.8 million visitor days, 621,400 attributed to South Lake Tahoe (the balance to Stateline).

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The report recognizes the 5% of gross receipts that must be contributed to the maintenance CIP fund, which can attribute to capital improvements, resource management, or as additional rent.<sup>65</sup> The report does not indicate the balance in the fund and whether the fund is saving to pay for the "Golf Course Irrigation

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<sup>59</sup> Volume 3, Appendix E, and Volume 2, Section 3.15.

<sup>60</sup> TRPA, various years, latest in 2006.

<sup>61</sup> 2000.

<sup>62</sup> [http://www.parks.ca.gov/?page\\_id=23308](http://www.parks.ca.gov/?page_id=23308)

<sup>63</sup> Page 9.

<sup>64</sup> Page 11.

<sup>65</sup> Page 12.

Rehabilitation Project,” noted on the State Parks Crime and Maintenance Data base, at a cost of \$1,435,920. It is not mentioned on the maintenance costs discussion.<sup>66</sup>

The report did not use revenue data from 2007, the year of the Angora fire, because of its effect on businesses. The report indicates that the drop in rounds played at LTGC would skew the analysis and pull it down artificially.<sup>67</sup> However, the data from 2008 and 2009 also show this declining trend.

The Market Analysis Findings,<sup>68</sup> based on the statistically invalid survey (conceded in the report), makes conclusions about the viability of an executive course based upon the proximity of Tahoe Paradise rather than considering course design and marketing potential. This was done at Incline: “Shot making’ skills are necessary to navigate this terrain and this course demands more accuracy than distance. Many of the holes on this course have incredible views of Lake Tahoe and surrounding Sierra Nevada mountains. The Mountain Course was named one of the Top Short Courses of America by Golf Range magazine for its third consecutive year because of its layout and design, community involvement, and customer service.”<sup>69</sup>

The report neglects to explain its assumption that the presence of a golf course gives LTGC a competitive edge over other wedding venues at Lake Tahoe.<sup>70</sup> It is unclear how this occurs and no consideration is given to the natural setting, the increased availability of parking without a golf course, the greater exclusivity that would be provided for the event, the possibility of reconfiguring the 7,000 square foot structure to provide for more than 2,000 square feet of rentable space. It’s possible that the summer wedding season could accommodate multiple events on the limited and popular peak weekends, giving the opportunity for significantly increased event revenues.

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cont.

### Scope of the Economic Analysis Report

The scope of the economic analysis report is too limited to provide support for an informed decision on the project alternatives:

- 1) The cost of implementation for various project options should be factored into the overall economic picture. For example, the cost of relocating and constructing the golf course holes, tees and fairways into Washoe Meadows State Park was not an element in comparison of project options.
- 2) The economic analysis was not broad enough. It didn’t include evaluation of purchase of private property in the analysis for the economic feasibility of the various alternatives. The decision to not consider purchase of private

A0B31-34

<sup>66</sup> Page 55.

<sup>67</sup> Page 12.

<sup>68</sup> Summarized on page 48.

<sup>69</sup> From Golf the High Sierra, a publication and organization that includes courses in Lake Tahoe, Carson Valley, Reno/Sparks and Graeagle as a marketing cluster, but for which the LTGC is not included.

<sup>70</sup> Page 51.



property did not allow additional options for consideration of alternative locations for the golf course which could have been feasible and would have changed the economic analysis appended to the EIR/EIS/EIS.

AOB31-34  
cont.

### Project Goals

The goals of the project listed in the economic feasibility report are approximately the goals listed in the EIR/EIS/EIS. The exception is C. Maintain the revenue level of the golf course to State Parks. The goal stated in the EIR/EIS/EIS is: Maintain adequate revenue generation from the LVSRA and/or WMSP. (Underscore added.) This is a key distinction.

AOB31-35

### Improper use of Survey

The report notes that State Parks conducted an on-site survey of golfers in 2007 (the year of the Angora Fire), with responses from less than 1% of the total player population. Because of the small sample size,<sup>71</sup> the results were “statistically invalid,” yet “useful and indicative of the total player population profile and preferences” and sweeping conclusions were reached based on the results, e.g., that the percentage of golfers who said they would not play a 9-hole or 18-hole executive course with all holes located on the east side of the river. Or, that two thirds of the rounds played at LTGC are by non-locals. The report did not comment on the validity and quality of the survey instrument, which was included in the appendices, and whether the tool itself exhibited a biased response from the local users who might have viewed it as an opportunity to comment on river restoration.

AOB31-36

More important, the survey samples the wrong population.<sup>72</sup> A market survey for future use of a differently configured golf course would not just sample users of the existing course. It would sample others who don't use the course now but might in the future, e.g. some of the users of the 170 nine-hole courses in California.<sup>73</sup>

Consequently, a statistically invalid survey of questionable quality, in a year when visitation would have reflected more the local population since overall Tahoe visitation was down due to the fire and the number of rounds played was too low to count in the study, forms the basis of conclusions of golf course alternatives viability. This makes the use of the survey even more questionable.

### Feasibility Results

#### Alternative 3. Reduced Play Area Course

A reduced play area course is estimated to be infeasible, but a review of the report shows that this conclusion to be unfounded.

AOB31-37

<sup>71</sup> Page 28.

<sup>72</sup> A footnote on Page 30 acknowledges that “survey respondents are likely to be biased regarding changes made to LTGC; a reduced play golf course would likely appeal to a different group of golfers.”

<sup>73</sup> <http://www.californiasgolf.com/9holegolfcourses.html>

Various studies have shown that women and children are more likely to utilize a 9-hole golf course. If a 9-hole course were selected for scenario 2 (Alternative 3), there would be an opportunity for an increase in this population of players which could offset some revenue loss due to having a less than regulation-size.<sup>74</sup> A recent Wall Street Journal article says: "According to the National Golf Foundation's most recent participation report, the number of golfers age 6-17 dropped 24%...between 2005 and 2008." It also says: "The future for golf not only for kids but for families has got to be short-course facilities, like the nine-hole executive course that wraps around the range..."<sup>75</sup>

Some income loss could be offset by increased use of the clubhouse facility for weddings or other events. The report indicates that an increased number of events held at Lake Tahoe Golf Course could potentially enhance the revenue stream of a nontraditional-length golf course.<sup>76</sup> The report indicates that they have been successful in increasing the number of events per year. They already have a snowmobile concession for additional revenue. There are many additional activities that could be pursued to provide additional revenue to replace some revenue lost if an option other than Alternative 2 is selected. E.g., "If LTGC could generate the same revenues as NTCC (North Tahoe Conference Center) for non-golf-related events it could capture an additional \$121,000 under scenario 3."<sup>77</sup> These options for Alternative 3 were not evaluated in the report and not included as economic benefits.

A comparison of Alternatives 2 and 3 is key to evaluating the feasibility of the options. Because the projections of future golf income appear to be overestimated, this results in an incorrectly exaggerated difference between the incomes for the two alternatives. Significantly, the economic analysis doesn't address the reality of the current and predicted continuing decline in golf as a recreational activity and its replacement with lower-impact and family friendly sports such as hiking, river rafting, bird watching and enjoyment of nature.

The report establishes a baseline of 33,163 annual rounds of golf played at LTGC<sup>78</sup> and indicates the demand for golf is declining and golf revenues are declining<sup>79</sup> and mentions "declining number of rounds played over the four year period" (2003 through 2006).<sup>80</sup> The report mentions the decreasing number of rounds played at LTGC.<sup>81</sup> This trend is likely to continue.

AOB31-37  
cont.

<sup>74</sup> Golf Searches for its Feminine Side", Wall Street Journal, March 27-28, 2010.

<sup>75</sup> Golf's Big Problem: No Kids", Wall Street Journal, May-15-16, 2010.

<sup>76</sup> Page 8.

<sup>77</sup> Page 51.

<sup>78</sup> Page 19.

<sup>79</sup> Pages 9, 11.

<sup>80</sup> Page 19.

<sup>81</sup> Page 19.

## 6 Environmental Planning

The draft EIR/EIS/EIS<sup>54</sup> indicates that “Under Alternative 3 the floodplain near the bridge proposed in Alternative 2 could be more fully restored than under Alternative 2...” This is a factor in favor of Alternative 3 over Alternative 2.

The draft EIR/EIS/EIS<sup>55</sup> <sup>56</sup> shows that Alternative 3 is clearly better than Alternative 2 due to:

- more acreage of Restored SEZ,
- more acreage of Restored 100-year floodplain/meadow,
- more acreage of Restored floodplain/meadow,
- less acreage of golf course within SEZ,
- less acreage of golf course within 100-year floodplain,
- less linear feet of golf course adjacent to the Upper Truckee River,
- fewer acres of managed landscape, and
- no bridges over the Upper Truckee River or Angora Creek.

The draft EIR/EIS/EIS<sup>57</sup> says with regards to Alternatives 2, 3, and 5: “Implementing any of these three alternatives would also restore varied areas of floodplain and SEZ vegetation and soil conditions.” This confirms that the selection of Alternative 3 for previously described benefits would restore floodplain and SEZ areas.

The draft EIR/EIS/EIS<sup>58</sup> says that Alternatives 3 and 5 would decrease the sources of nutrient, sediment, or hydrocarbon pollutants to stormwater as well as reduce stormwater runoff.

From a land use planning perspective, it makes more sense to select Alternative 3 in order to optimize environmental benefits while still retaining the ability to have a reduced area 9- or 18-hole golf course. It avoids the undesirable impacts that would result from a golf course development within land that was set aside as a State Park for its conservation values.

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<sup>54</sup> Volume 1 on page 2-7.

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<sup>56</sup> Volume 1, page 2-74.

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<sup>63</sup> Page 9.

<sup>64</sup> Page 11.

<sup>65</sup> Page 12.

also been modified in the report to convert to 2007 dollars. These actions arbitrarily inflate the perception of the amount of income in order to distort the fact that the revenue in 2008/09 from Lake Tahoe Golf course was only \$449,324.

Even this figure is too high, because averages are used improperly. The report analyzes data from 2003-2006, which show a declining trend in golf rounds played and net revenues,<sup>102</sup> but calculates the averages for those years and infers these averages are indicative of the future. This is wrong. For data with declining trends, the future is more likely based on a continuation of the trends. The result is the massive over-estimation of future revenues.

The conclusion that a reduced play area course would result in a negative cash flow for the concessionaire is faulty. If payments to State Parks were reduced proportionally, and the golf course concession increased income from events, the golf course concession would be feasible.

These factors show that the difference between economic factors for an 18-hole regulation golf course and a reduced play course are much less than shown in the report.

#### B) Feasibility of Alternative 5

The report concluded that Alternative 5 is infeasible because the operation of the LVSRA clubhouse for events only would lose money. The report did not sufficiently analyze methods to increase event usage at the clubhouse. It did not adequately consider options for additional facilities or activities to increase income.

#### **Economic Impact to the Local Economy**

This section neglects to consider the Lake Tahoe visitor economy as a whole, which relies much more on the region's amenities, of which LTGC is one asset. It is not proven why LTGC is considered a "driver" of the economy and no discussion is made that displaced retail, food and beverage might get subsumed in the businesses offered by the private sector if they disappeared from LTGC. The conclusion of a \$7.5 million dollar community loss<sup>103</sup> because it assumes that all the visitors to the Lake Tahoe region who use the golf course would disappear instead of continuing to participate in the myriad of recreational activities available at Tahoe.

The inclusion of second homeowners being included in total visitor spending for the course<sup>104</sup> is mistaken. Will these people sell their homes should the course close? Or will they redirect to other activities?

The economic analysis does not mention or consider the City of South Lake Tahoe's "leakage" study regarding spending and instead assumes that all the money from service workers and visitors stays in the community for recirculation.<sup>105</sup>

<sup>102</sup> Fig. 1, page 11.

<sup>103</sup> Page 63.

<sup>104</sup> Page 64.

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cont.

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Total additional LTGC revenues and taxes benefiting the local economy are estimated at \$6.1 million annually. These numbers are based on incorrect assumptions. While economic activity in the local economy may be reduced by selecting Alternative 3 as compared to selecting Alternative 2, the difference would be much smaller than \$1 million annually.

The report relies heavily on the estimated number of Lake Tahoe Golf Course visitors to estimate the additional revenues and taxes to the local economy that are attributable to LTGC. This is the number of visitors who are visiting Lake Tahoe for the purpose of playing golf at LTGC and who would not otherwise be visiting Tahoe. The report states that in the Base Case with a regulation 18-hole golf course there are 8,942 annual individuals for this category of visitor.<sup>106</sup> This estimate was apparently based on the faulty survey (see above). This estimate assumes that 2/3 of LTGC players are visitors and 1/3 are locals.

Information provided in State Parks public meetings was inconsistent with the source of this estimate. At one point, State Parks personnel implied that this was estimated by zip code of the person making the reservation. This could be highly inaccurate because it doesn't account for the fact that second homeowners make up about 25% of South Lake Tahoe residence owners.

At another meeting, State Parks personnel implied that this estimate was based on the number of tournaments at LTGC. However, neither State Parks nor American Golf would release a list of tournaments even though at one meeting the State Parks project manager said she had been given a list of tournaments for 2009. In any case, many of the tournaments are principally local, such as the benefit for St. Theresa School.<sup>107</sup>

The assumption on the number of visitors using LTGC is therefore unsubstantiated.

The 2002 SRI study projects that 32% of golf trips are planned with the sole intention of playing golf.<sup>108</sup> It's hold to transfer this generality to a recreational area like Tahoe, which has many other visitor attractions. This might be true for a course like Edgewood, but not for LTGC.

All the succeeding calculations for the impact on the local economy are then based on this faulty assumption.

#### Issues with estimate for total additional revenue benefiting the economy

Because the number of visitors who only come to Tahoe to play at Lake Tahoe Golf Course is not supported by the analysis and because it appears to be much less than estimated in this report, the total additional revenue benefiting the economy would

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cont.

AOB31-39

<sup>105</sup> <http://www.cityofslt.us/economicdevelopment/PDF/Doc5.3AppendixJobs.pdf>

<sup>106</sup> Page 61, Table 27, Visitation, Spending, Earnings and Jobs by Scenario.

<sup>107</sup> [www.laketahoenews.net/2010/09/st-theresa-golf-tournament](http://www.laketahoenews.net/2010/09/st-theresa-golf-tournament)

<sup>108</sup> SRI International, 2002 report.

then be less than shown in this report. In fact, even if the report estimate of \$6 million annually were accurate, this would represent a miniscule amount of the \$ 1.2 billion income earned by residents of the Lake Tahoe region directly attributable to tourist expenditures.<sup>109</sup>

With a reduced golf course under Alternative 3, some golfers may choose to play golf at other regulation courses, which would increase the use of other 18-hole regulation golf courses already in the surrounding area. The economic analysis did not consider that other golf courses in the area would retain the revenue for the community, and presented a mistaken view that the loss would result in a loss of revenue for the entire region.

From this analysis, very little is known about how that economic activity would change under different scenarios. Some fraction of current golfers, probably very high, would visit and do other things in the absence of golf.

Visitor spending in Tahoe is \$474 million and golfers spend 7.5 million,<sup>110</sup> or 1.6%, a small percentage. But this is overestimated because many golfing visitors would visit anyway.

The draft EIR indicates that LTGC averaged generation of 76 full and part time jobs which are mostly for minimum wage food and beverage activities. The analysis of effects on employment if Alternatives 3 or 5 are selected failed to take into account options for additional revenue that could be provided if additional events and activities are developed, retaining many of these jobs.

Throughout the document, the number of jobs is mentioned as "full and part time." Nowhere are the jobs reported as Full-time Equivalents. The report asserts "168 full and part-time jobs (76 at LTGC and 92 elsewhere).<sup>111</sup> The annual payroll of these 76 jobs is estimated to be \$628,000,<sup>112</sup> an average of \$8,263/job. If those jobs earned the El Dorado County average wage of \$22,296,<sup>113</sup> this payroll would support 28 full-time equivalents.

#### Earnings by employees generated elsewhere in the South Shore

The report estimates that 92 related jobs are supported elsewhere in the South Lake Tahoe area and earnings by employees generated elsewhere in South Shore by visitors to LTGC are estimated to decrease by \$287,000 to \$880,000 annually with a reduced play area course. This is estimate of decrease fails to take into account that most golfers would still be likely to play in a local golf course, or, if not, still visit Lake Tahoe.

#### Other Issues

<sup>109</sup> Email from Georgette Riley ([info@tahoechamber.org](mailto:info@tahoechamber.org)) sent August 23, 2010.

<sup>110</sup> Page 64.

<sup>111</sup> Volume II, page 3.15-1.

<sup>112</sup> Page 23.

<sup>113</sup> Page 65.

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- Risks and associated costs. The summary of direct financial impacts does not take into account the continuing risks and costs associated with having a golf course along the Upper Truckee River with damages from floods and diesel or other chemical spills (which have occurred at Lake Tahoe Golf Course), with exposure along a longer stretch of the river or with uncertainties in future water supplies.
- Economic impact on Tahoe Paradise Golf Course. Alternative 2 would create a state-funded, improved and expanded golf course that would directly compete with the privately owned nearby 18-hole executive Tahoe Paradise Golf Course. The draft EIR/EIS/EIS does not address the potential impact of Alternative 2 on this local business' revenue or employees.
- Who will pay. In Public meetings with the project manager, she was questioned how the concessionaire was going to be repaid for the golf course design and development. She stated that the public would be charged more (in violation of the State Parks stated goal of providing affordable golf) and State Parks would receive less revenue from the concession for 10 years after the golf course was completed. This loss of income was not reported in the EIR/EIS/EIS and the present worth of this loss was not considered in the biased evaluation of economic impact.
- Income loss during construction. For Alternative 2, construction would be phased over a 3- to 4-year period. In Year 1 of construction, golf play would be limited to a 9-hole course on the east side of the river to allow for construction access adjacent to the river. In Year 2, golf play would be either completely shut down or located on the western nine holes constructed in Year 1. The reconfigured 18-hole regulation golf course would be open to play in Year 3, with possible minor short-term modifications to allow for construction access to the river. The economic impact of this loss of income was also not accounted for in the economic analysis.

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The report has several disclaimers on the Contact Information page.

- 1) The data from secondary sources are not guaranteed to be accurate. This is an issue because the public is not provided with the basis for certain key assumptions in the report.
- 2) It is stated that the report "should not be relied upon as sole input for decision-making." This is an issue because the draft EIR/EIS/EIS relies too heavily on the economic analysis report to severely limit the number of feasible alternatives. Parks Dept staff and their consultants have stated in meetings that only Alternative 2 is feasible.
- 3) The report states that the "Updates to information obtained for this report could change or invalidate the findings contained herein." This is an issue because the report used out dated data and/or did not adequately account for some relevant data.

AOB31-45



**Conclusion**

The feasibility analysis is based on many incorrect assumptions and results are based on faulty methods. Therefore, the conclusions stated on page 55 are not valid based on the analysis.

The report wildly overestimates the impact on the Lake Tahoe economy and jobs if the golf course were to disappear and underestimates the feasibility of a reduced-play course on the east side of the river.

AOB31-46

## 8 Water Quality

Perhaps the most important element of the project and the EIR/EIS/EIS is water quality. The principle reason, but not the only one, for restoring the Upper Truckee River is to reduce bed and bank erosion of fine sediment and nutrients, which contribute to the decline of clarity of Lake Tahoe and to increase the deposition and absorption of fine sediments and nutrients on the flood plain during flood events.

Alternatives 2, 3 and 5 all call for more-or-less full restoration of the river. But they would have markedly different impacts on water quality.

### Pesticide Use

TRPA sets requirements and standards for water quality control. In the TRPA Code of Ordinances,<sup>114</sup> standards are set for discharges to groundwater and surface water. Concern is expressed regarding pesticide use for pest management.<sup>115</sup>

A representative of State Parks recently stated that Lake Tahoe Golf course does not use pesticides. This assertion is contradicted by the EIR/EIS/EIS, in the section describing Alternative 2:

Fertilizer and pesticide use would continue to occur twice per year in May and November and if requested by overseeing agencies (Lahontan RWQCB, TRPA or El Dorado County), an updated chemical, irrigation, agronomic, and erosion control plan, with reporting requirements would be prepared. However, it is expected that application protocols and monitoring and reporting requirements would continue as is occurring today.<sup>116</sup>

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Furthermore, the State Parks concession contract allows use of pesticides.

The TRPA's 2006 Threshold Evaluation Report,<sup>117</sup> states that Lahontan and TRPA prohibit the use of pesticides in SEZs or where aquatic systems are at risk. However, this is not reflected in the Lahontan's discharge requirements for the golf course.<sup>118</sup> Nor is it reflected in the concession contract between State Parks and American Golf Corporation. Therefore, there is a continuing concern that additional golf course development (with a larger footprint, including a location the Upper Truckee River, wet meadows, sensitive spring complexes and fens) will lead to use of pesticides which could pollute the environment and adversely affect water quality.

<sup>114</sup> Chapter 81, Section 81.2.

<sup>115</sup> Section 81.6.

<sup>116</sup> Page 2-54.

<sup>117</sup> 2006 Threshold Evaluation Report, Water Quality Appendix, Table 3-4, Item 38, page 25.

<sup>118</sup> Updated Waste Discharge Requirements for California Department of Parks and Recreation and American Golf Corporation, Lake Valley State Recreation Area, Board Order 6-00-48. and Monitoring and Reporting Program 6-00-48.

These concerns and their environmental impact are not adequately addressed in the draft EIR/EIS/EIS

Fertilizer Use

TRPA’s Code provides criteria for fertilizer management that are not carried out in practice at Lake Tahoe Golf Course.<sup>119</sup> Examples include:

- Criterion 1 requires a demonstration of the need for the use of phosphorus and recommends consideration of phosphorus-free fertilizer. Soil tests and reports show excessive amounts of phosphorus are being used at Lake Tahoe Golf Course.<sup>120</sup>
- Criterion 3 recommends avoiding early and late season fertilizer. However, this is exactly when the golf course uses fertilizer. According to the draft EIR/EIS/EIS, fertilizer use at Lake Tahoe Golf Course typically occurs in May and November.<sup>121</sup>
- Criterion 11 requires that a soil testing program be combined with an assessment to adjust use of nitrogen and phosphorus for Tahoe Basin growing conditions. Lake Tahoe Golf Course uses a Midwest company to perform the soil testing analysis and make recommendations. Its recommendations are not appropriate for Tahoe growing conditions or the Tahoe Basin regulatory environment and concerns.

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This nonconformance with the current guidance leads to concerns that golf course development in a larger area, including uplands (as in Alternative 2), could lead to additional pollution events and adverse effects on water quality and the environment. Alternative 3 would have a lower number of acres of managed landscape with a lower volume and acreage of fertilizer use, thus lower risks.

Several sections of TRPA’s Code indicate concerns for the management of fertilizer for large users such as golf courses.<sup>122</sup> Golf courses are listed as potential sources of drinking water source water contaminating activities.<sup>123</sup> This highlights the similar potential for golf course contamination of Lake Tahoe through discharge into the Upper Truckee River or nearby ground water. Alternative 3, with lower acreage of golf course and avoidance of uplands and spring complexes, presents a lower risk.

As mentioned in the draft EIR/EIS/EIS and in TRPA’s 2006 Threshold Evaluation Report, Lake Tahoe has been designated an “Outstanding National Resource Water” and every effort should be made to avoid actions which will risk degradation of the lake water quality. This Threshold Evaluation Report expresses concern for

<sup>119</sup> Chapter 81 Section 81.7.A.

<sup>120</sup> Turf and Ornamental Soil Test and Recommendation Report 1/14/2009 from Parks Dept PRA request

<sup>121</sup> Page 2-34.

<sup>122</sup> Chapter 81, such as Section 81.7.C.

<sup>123</sup> Chapter 83.

fertilizers being used largely to support non-native vegetation as would be the case for a greater area of golf course as proposed for Alternative 2.

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These concerns on fertilizer use are not adequately addressed in the EIR/EIS/EIS.

SEZ and Floodplain

The Water Quality Appendix of the Threshold Evaluation indicates: “All new development must be setback from the defined extent of the SEZs to preserve their integrity. There are important values of the edge zone created by the SEZ and surrounding vegetation types.”<sup>124</sup> The draft EIR/EIS/EIS has failed to demonstrate that Alternative 2 would be in compliance with this requirement.

This table also indicates that “Additional restrictions on fertilizer use could include bans on fertilizer applications in some situations, such as golf courses in SEZs...”<sup>125</sup> Alternative 3, with a reduced golf course footprint out of the SEZ, would be more consistent with this goal.

AOB31-49

The current TRPA Regional Plan has criteria for allowing new land coverage or other permanent disturbance in SEZs.<sup>126</sup> These criteria are also listed in the TRPA Goals and Policies document.<sup>127</sup> Alternative 3 would be more consistent with these criteria than Alternative 2 would, because Alternative 3 would greatly reduce the extent of encroachment in SEZs.

The Regional Plan also requires that the 100-year flood plain be restricted from development. Alternative 3 would come much closer to meeting this requirement than Alternative 2.

TRPA Goals & Policies

The TRPA Goals & Policies document indicates the intention to reduce dissolved inorganic nitrogen loading to Lake Tahoe from all sources.<sup>128</sup> Goal #1 is “...restore 80 percent of the disturbed lands.” As mentioned in item 4 of this document, “It is the Agency’s intent to have at least 80 percent of these lands restored to a natural or near natural state...”<sup>129</sup> Alternative 2 would disturb additional land in Washoe Meadows State Park with a larger golf footprint while restoring a portion of land in the State Recreation Area. This represents little, if any, net gain. Alternative 3 would more closely meet the goal in this policy document by restoring more land than it disturbed. For Alternative 2, the golf course development in Washoe Meadows State Park would not be as natural of a state as the existing park land, some of which has been restored in recent years.

AOB31-50

<sup>124</sup> Table 3-4, item 15 on page 17.

<sup>125</sup> Item 16 on page 18.

<sup>126</sup> Page 129, in the section on Stream Environment Zone Encroachment.

<sup>127</sup> Page IV-2, Item 5.

<sup>128</sup> Page II-39.

<sup>129</sup> Page II-43.

The Goals & Policies document states: “fertilizers shall not be used in or near stream and drainage channels, or in stream environment zones, including setbacks...”<sup>130</sup> Currently, some use of fertilizer does occur at Lake Tahoe Golf Course within the SEZ for golf course greens located next to the Upper Truckee River. For Alternative 2, there would be new development in a SEZ which would not comply with this policy. This item goes on to state: “Since Lake Tahoe’s primary water quality problem is an imbalance in the lake’s nutrient budget, control of artificial fertilizers (which add nutrients to the Basin) is an essential component of TRPA’s water quality policy.” Alternative 3 would better address this by reducing the golf course footprint and moving more acreage out of the SEZ and flood plain.

AOB31-50  
cont.

Lake Tahoe as an Outstanding National Resource

The Tahoe Basin Plan of the Lahontan Regional Water Quality Control Board states that there is a requirement “that the water quality of the waters which constitute an outstanding national resource be maintained and protected.”<sup>131</sup> Lake Tahoe, as one of only two California waters designated by Federal Regulation as outstanding national resources, requires additional protections from potential contamination from golf course turf management practices.

AOB31-51

This issue is not adequately addressed in the EIR/EIS/EIS.

Lahontan’s Tahoe Basin Plan

This Basin Plan notes that “existing and future golf course development in the Lake Tahoe Basin requires special control measures to prevent further eutrophication of surface waters and contamination of drinking water supplies.<sup>132</sup> “The use of fertilizer in stream environment zones is prohibited...the use of chemicals other than fertilizer should also be prohibited in stream environment zones.”<sup>133</sup> Alternative 2 would result in some greens in SEZ where fertilizer would be applied. Alternative 3 would eliminate this conflict with the requirements.

AOB31-52

The Basin Plan states that “Golf courses involve intensive management of turf, including the use of pesticides and fertilizer which may run off into surface waters or percolate into ground water.”<sup>134</sup> It is also states that “Golf course turf demands large amounts of water for irrigation.” The concession contract between State Parks and the American Golf Corporation requires that “no pumping or diversion of water from the river or its ground water aquifers shall take place within the unit when the river is at or below established minimum flow levels”.<sup>135</sup> The draft EIR/EIS/EIS indicates that the actual quantity of water historically pumped for irrigation from

<sup>130</sup> Page II-43 in item 6.

<sup>131</sup> Chapter 3, page 3-12.

<sup>132</sup> Chapter 5, Page 5.15.-3.

<sup>133</sup> Page 5.15-4.

<sup>134</sup> Page 4.11-10.

<sup>135</sup> Appendix D, page D-3.

the Upper Truckee River, and retained as a back up system, has not been officially recorded.<sup>136</sup> This lack of records causes a concern for whether the above requirements for limitations of use of water sources have been met. However, the 1988 LVSRA General Plan states that daily water use was, at that time, about 756,000 gallons.<sup>137</sup>

AOB31-52  
cont.

The process for monitoring water quality is not robust. While the practices may meet most legal requirements, there are issues with the process that erode confidence that pollutants are kept from the Upper Truckee River:

- According to the draft EIR/EIS/EIS, the golf course currently occupies an area of 133 acres. There is about 6,382 linear feet of golf course along the Upper Truckee River. There are only a few water monitoring stations.<sup>138</sup> By order of Lahontan: "The Monitoring and reporting program established two surface water monitoring and three monitoring wells."<sup>139</sup> The monitoring locations were established in 1989. Since that time, advances in techniques of water monitoring would dictate additional monitoring stations and methods in an area of high sensitivity. Close monitoring of the effects of the golf course on the Upper Truckee River are important from the aquatic habitat standpoint as well as for the maintenance of the clarity of Lake Tahoe.
- Who takes the samples and what their qualifications are is not specified. Lahontan merely requires that the sample collector's name be provided along with the date, and information about the analyses.<sup>140</sup> Due to the sensitivity of potential pollutant discharge to the Upper Truckee River, strict requirements for sampling personnel and sampling protocol should be provided. This would be consistent with the best practices implemented at Squaw Creek Golf Course.
- According to Lahontan, beginning on December 15, 2001, annual reports must be submitted for Lake Tahoe Golf Course for the following:<sup>141</sup>
  1. Erosion Control Repairs/Stormwater Treatment Systems  
This is to include any problem encountered and/or any corrective actions taken during the season.
  2. Irrigation System Performance and Improvements

AOB31-53

<sup>136</sup> Page 2-34.

<sup>137</sup> Page 89.

<sup>138</sup> Volume 1, Table 2-3.

<sup>139</sup> California Regional Water Quality Control Board, Lahontan Region, Board Order No. 6-00-48, WDID No. 6A098811003. Updated Waste Discharge Requirements for California Department of Parks and Recreation and American Golf Corporation, Lake Valley State Recreation Area, June 14, 2000.

<sup>140</sup> California Regional Water Quality Control Board, Lahontan Region, Board Monitoring and Reporting Program 6-00-48 for California Department of Parks and Recreation and American Golf Corporation, Lake Valley State Recreation Area, June 14, 2000. Appendix A, page 2.

<sup>141</sup> *ibid.* Pages 7-8.

This is to include information on measurements of irrigation efficiency such as distribution uniformity, water applied versus evapotranspiration, leaching fraction, or other applicable measurement identified in the Chemical and Irrigation Management Plan as a means of achieving reduced transport of applied chemicals into groundwater. Include a progress report on improvements made to irrigation system.

3. Reporting and Update of Chemical and Irrigation Management Plan

Report any adjustments to the Chemical and Irrigation Management Plan, and whether these changes were successful or not, and note any planned changes in next year's management plan.

Reports were made available for 2002 through 2007. No reports were available for 2008 or 2009. Reports did not include the items outlined above. Instead they only included information on fertilizer quantities used per golf course location.

Combined with an undocumented change to reduce the frequency of monitoring at Lake Tahoe Golf Course, these factors result in a perception that it is not easy to confirm whether or not there are issues with contamination of the ground water or river.<sup>142</sup>

"Potential Pollutant discharge from the facility consists of nutrients from fertilizers, and toxic compounds from the use of pesticides, products of erosion, construction waste materials, and small amounts of oil and grease contained in stormwater runoff from impervious surfaces, diesel fuel and gasoline fuel from the two fuel tanks..."

To reduce these concerns, Alternative 3 is preferred over Alternative 2. Alternative 3 would reduce the amount of irrigation water and would have a smaller area of application for pesticides and fertilizers than Alternative 2.

Additional Risks Associated with Golf Course Operation

Additional risks associated with golf course operation are not mentioned or quantified in the draft EIR/EIS/EIS:

- Flooding, such as occurred in 1997, can cause movement of chemicals from golf course turf to the Upper Truckee River, as well as damage to cart paths and roads with potential erosion and sediment loads to the river. Alternative 3 would reduce this risk because it would have only 10 acres of golf course within the 100-year floodplain as opposed to the 40 acres of golf course within the 100-year floodplain for Alternative 2.

AOB31-53  
cont.

AOB31-54

<sup>142</sup> Page 3, California Regional Water Quality Control Board, Lahontan Region, Board Order No. 6-00-48, WDID No. 6A098811003, Updated Waste Discharge Requirements for California Department of Parks and Recreation and American Golf Corporation, Lake Valley State Recreation Area, June 14, 2000.

- The snowmobile operation on the golf course during the winter resulted in a diesel spill in 1999. Diesel fuel discharged to a pond and the Upper Truckee River. The spill occurred over several months and the operator was cited and fined \$20,000. The golf course is now required to sample runoff from the parking lot and maintenance area.
- Lake Tahoe is a designated an Outstanding National Resource Water and its clarity has declined due to the delivery of fine sediments from various watersheds in the basin as well as due to "increased phytoplankton productivity, which in turn has been attributed to an increase in nutrients, especially nitrogen and phosphorous."<sup>143</sup> Numerous scientific papers reference concerns about the fertilizers used on golf courses and their effects on water quality and ecosystem health. One mentions that golf courses are contributing to the eutrophication of Lake Tahoe, which is "a process whereby water bodies, such as lakes,... receive excess nutrients that stimulate excessive plant growth (algae,...etc)."<sup>144</sup>

AOB31-55

AOB31-56

To reduce these risks, snowmobile operations should be re-evaluated and Alternative 3 should be preferred over Alternative 2.

<sup>143</sup> Volume 1, Section 1.1.1.

<sup>144</sup> Primary Productivity, Nutrients, and Transparency During the Early Onset of Eutrophication in Ultra-Oligotrophic Lake Tahoe, California-Nevada, Author: Charles R. Goldman, Source: Limnology and Oceanography, Vol. 33, No. 6, Part 1: W.T. Edmondson Celebratory Issue (Nov. 1988), pp. 1321-133.



## 9 Wildlife Species of Special Interest

The draft EIR/EIS/EIS fails to fully consider the environmental impact of Alternative 2 on the mule deer population and habitat.

According to the EIR/EIS/EIS: "Mule deer is designated as a special-interest species by TRPA."<sup>145</sup> Mule deer have been sighted in the study area in Washoe Meadows State Park and reported to WMC:

- Ron Robbins sighted deer in the park near Delaware St. on or around August 11, 2010.
- Washoe tribe member Buck Cruz saw deer prints in the park near the main meadow on or around October 30, 2009.
- Bill Butler saw a mule deer doe accompanied by two fawns at around 5:45am on May 30, 2009.

These sightings, as well as the vegetation and forest habitat described in the study area, indicate that the area in Washoe Meadows State Park where the golf course is proposed for relocation is suitable for deer travel and foraging. Because there are many areas of the park with deep cover and no trails, as well as springs, creeks and the nearby Upper Truckee River, and because fawns were sighted in the park recently, the area could also be important for fawning. Because the EIR/EIS/EIS does not directly address the impact of the golf course development in the park on mule deer habitat and movement corridors, the analysis is inadequate.

The EIR/EIS/EIS mentions expected disturbances from recreation and residential development. The report does not address recent park visitors' deer sightings or address specific issues with golf course development that would replace natural deer habitat. Deer frequent many urban/rural interfaces all over California, including next to many cities such as those in the San Francisco Bay Area. Golf courses add an altered landscape that has the potential to attract deer in a way that is not desirable. Golf landscaping generates an unnatural food source for deer such that the deer can become a nuisance to the golf course operation. In some cases, golf courses seek depredation permits to remove the deer. The effect of the golf course development on deer movement corridors in Washoe Meadows State Park is also not addressed in the draft EIR/EIS/EIS.

TRPA's Goals and Policies establishes Goal #2 to "Preserve, enhance, and, where feasible, expand habitats essential for threatened, endangered, rare, or sensitive species found in the Basin."<sup>146</sup> The Policy states that:

"Endangered, threatened, rare, and special interest species shall be protected and buffered against conflicting land uses." "Species in the above categories need extra protection to ensure their longevity in the Basin. Critical habitat sites

<sup>145</sup> Volume 2, Page 3.5-84.

<sup>146</sup> Updated October 25, 2006 in the Wildlife Section, page IV-11.

AOB31-57

of these animals need to be protected and buffered from disturbing land uses. This will be accomplished by regulating uses within the disturbance and influence zones of seven species for which thresholds have been adopted.”

TRPA’s 2006 Thresholds report, indicates that there is “a non degradation standard for riparian habitat and providing for a minimum number of population sites for a list of special interest species.”<sup>147</sup> Progress is to be made towards achieving threshold standards for wildlife. Meadows are identified as important areas for deer. The impact of Alternative 2 on attainment of these standards related to special interest species such as deer is not addressed.

The TRPA Code indicates that “Special interest species which are locally important because of rarity or other public interest ... shall be protected from habitat disturbance from conflicting land uses.”<sup>148</sup> The development of a golf course in Washoe Meadows State Park represents a conflicting land use for mule deer that would be inconsistent with compliance with this ordinance.

Similar comments apply for snowshoe hare and American marten which have both been documented in Washoe Meadows State Park.

AOB31-57  
cont.

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<sup>147</sup> Chapter 7, Wildlife.

<sup>148</sup> Chapter 7B, Wildlife Resources.

- AOB31-1 The commenter's support for Alternative 3 or another alternative that restores the river, retains Washoe Meadows SP in its entirety, and protects the environment is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB31-2 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-3 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-4 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-5 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-6 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-7 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-8 The commenter states that Alternative 2 would not be consistent with applicable plans, policies, and regulations. See Master Response Section 3.2, "Land Use."
- AOB31-9 The commenter states that the project is not an appropriate use of Federal funds. Restoration of the Upper Truckee River is a primary purpose of Reclamation's Tahoe Regional Wetland Development Program. As described in Chapter 1, "Introduction and Statement of Purpose and Need," of the draft EIR/EIS/EIS (page 1-4), the primary purpose and need for the project is related to the river restoration, with modifications of the golf course a required secondary action to accomplish an effective restoration approach. Consequently, the appropriateness of the use of Federal funds is related to achieving the river restoration goals of the project as determined by Reclamation. Federal funds were not and will not be used for golf course design or construction.
- AOB31-10 The commenter reiterates scoping comments and states that not all scoping comments provided were incorporated into the draft EIR/EIS/EIS. See response to comment AOB8-1.
- AOB31-11 The commenter's opinion of the public workshops held for the project is noted. See response to comment AOB8-1.
- AOB31-12 The commenter states that siting criteria used for the alternatives analysis in the draft EIR/EIS/EIS are flawed and that the State should have used a real estate agent and looked at private parcels, because costs have gone down. As described in Chapter 2, "Project Alternatives," of the draft EIR/EIS/EIS, Section 15126.6(f) of the State CEQA Guidelines states that the alternatives analysis should identify whether any of the

project's potentially significant effects would be avoided or substantially lessened by putting the project in another feasible location. Section 15126.6(f) also states that if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion. Among the factors that may be taken into account when addressing the feasibility of off-site alternatives are site suitability, economic viability, availability of infrastructure, consistency with plans and policies, other regulatory limitations, and ability of the project proponents to reasonably acquire, control, or otherwise have access to the alternative site. In determining whether alternative locations for the project need to be considered in an EIR, Section 15126(f)(1) indicates that the proponent's ability to reasonably acquire or control an alternative location can be taken into account. Recognizing the current state budget circumstances, it would not be feasible to set aside public funds for state acquisition of private property for alternative golf course locations, so available public parcels were considered. Section 15126.6(f)(2)(A) of the State CEQA Guidelines states that only locations that would feasibly avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. Purchasing a large private parcel was not only infeasible but none that met most of the other siting criteria were known to be available at the time of the analysis.

See Master Response Section 3.7, "Economics," for a discussion of the scope of the economic analysis. See Master Response Section 3.2, "Land Use," for a discussion of consistency of the project with plans, policies, and regulations related to land uses within Washoe Meadows SP. As shown in Exhibit 2-2 of the draft EIR/EIS/EIS, the area proposed for the reconfigured golf course under Alternative 2 is predominantly less than 20% slopes.

- AOB31-13 The commenter's opinion of the EIR/EIS/EIS analysis and process is noted. As described in Chapters 1 and 2 of the draft EIR/EIS/EIS, State Parks, Reclamation, and TRPA followed CEQA, NEPA, and TRPA requirements on full disclosure, transparency, and due process. Multiple outreach events were held by State Parks to provide information about the proposed alternatives beyond public scoping meetings and recreation workshops; however, no outreach events were private and all members of the public were welcome to attend each of these events. See response to comment AOB8-1 for a discussion of selection of a proposed Preferred Alternative.
- AOB31-14 The commenter states that reconfiguring the golf course would be inconsistent with a previous lawsuit related to the park units. See Master Response Section 3.2, "Land Use."
- AOB31-15 The commenter states that the yardage of golf course would be increased under Alternative 2. As described in Section 2.5.1, "Project Features" the current Lake Tahoe Golf Course is an 18-hole regulation length, par 71 course with a total walking distance of 6,741 yards designed to host championship play. The current course has three sets of tees at 6,741; 6,327; and 5,703 yards. The course rating and slope for the three tees are, respectively, 70.8/126, 68.9/120, and 66.7/109. The conceptual design for the reconfigured course maintains its status as an 18-hole regulation course designed to be able to host championship play, with approximately the same slope, rating, length, par, and variety of holes as currently exist. In addition to the natural features of a site, the golf course layout incorporates design features, such as teeing areas, greens complexes, sand and grass bunkers, and water features to define the strategy of each hole and produce the desired visual quality, keeping in mind circulation, speed-of-play, and safety. AOB31-16  
The commenter states that land use maps are incorrect but lists information presented in habitat maps. See Master Response Section 3.3, "Biological Resources," and

Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”

- AOB31-17 The commenter states that campgrounds and golf course facilities were not adequately evaluated. Campgrounds within Washoe Meadows SP are not being considered at this time and are beyond the scope of the current project objectives. As described in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, if Alternative 5 were selected, State Parks would be able to embark on a new planning effort for the entire area at any time in the future when it wishes to consider developing permanent facilities. This effort could involve planning for Washoe Meadows SP and Lake Valley SRA together or separately. It could involve reclassifying land and considering a variety of actions related to outdoor recreation and resource management. Campgrounds are one type of recreation facility that could be considered in the future, but they are not proposed at this time and would require separate environmental review. Locations for golf course facilities were considered in depth. See Master Response Section 3.2, “Land Use,” for a discussion of lands proposed for exchange. Also see Chapter 3, “Affected Environment and Environmental Consequences,” of the draft EIR/EIS/EIS for a detailed evaluation of impacts of reconfiguring the Lake Tahoe Golf Course on each resource area.
- AOB31-18 The commenter states that promoting the golf course as “Audubon” certified in the public meeting is misleading and represents bias toward Alternative 2. The draft EIR/EIS/EIS simply presents factual information about the existing golf course, which includes its certification. As described in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, the Lake Tahoe Golf Course is a member of the Audubon Cooperative Sanctuary Program for Golf Courses (ACSP) and is a certified cooperative sanctuary under the ACSP. The ACSP is an award-winning education and certification program that helps golf courses protect the environment and preserve the heritage of the game of golf. Since its inception in 1992, the ACSP has assisted golf courses in integrating environmentally responsible maintenance practices into day-to-day course operations. The ACSP helps people to enhance valuable natural areas and wildlife habitats that golf courses provide, to improve efficiency, and to minimize potentially harmful impacts of golf operations (ACSP 2006). This information presented in Chapter 2 of the draft EIR/EIS/EIS characterizes existing conditions that would continue under Alternative 2; therefore, presentation of this information at the public meeting did not mislead the public.
- AOB31-19 The commenter states an opinion that Alternative 3 would establish a “better” geomorphically functioning channel. However, as described in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, Alternatives 2, 3, and 5 would all follow the same approach to restoring the river. Alternative 3 would decrease the golf landscape adjacent to the Upper Truckee River; however, as described in response to comment AOB8-7, Alternative 2 would also decrease the golf course landscape adjacent to the river (as would Alternative 5). The commenter correctly states that low-density use would increase and the use of irrigation and fertilizer would decrease within Washoe Meadows SP; however, as described in Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” the water used for irrigation is obtained under an existing water right and fertilizer use is limited.
- AOB31-20 The commenter is concerned about habitat fragmentation under Alternative 2. See Master Response Section 3.3, “Biological Resources.”
- AOB31-21 The commenter states that the buffer area around the golf course is not considered in the coverage impacts. This is correct; a buffer would not be considered coverage and would

not create a negative impact. The commenter is concerned about reduced recreation access through the study area. See Master Response Section 3.5, “Recreation.”

AOB31-22

The commenter states that resources cannot be committed without a general plan for Washoe Meadows SP. See Master Response Section 3.2, “Land Use.”

AOB31-23

The commenter states that impacts of a bridge and restrooms on groundwater were not addressed. See response to comment AOB8-14 and Master Response Section 3.3, “Biological Resources.” The commenter states that the EIR/EIS/EIS “mischaracterized” dry meadow but does not provide details about the location of this mischaracterized area. An updated vegetation map is presented in Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS.”

Potential impacts related to erosion are addressed in Impact 3.6-1 (Alt. 2), “Soil Erosion, Sedimentation, and Loss of Topsoil,” and Impact 3.4-6 (Alt. 2), Short-Term Risk of Surface Water or Groundwater Degradation during Construction.” Mitigation for these potential impacts during project construction and operation is provided in Mitigation Measures 3.6-1A (Alt. 2) and 3.4-6 (Alt. 2), “Prepare and Implement Effective Site Management Plans,” and Mitigation Measure 3.6-1B (Alt. 2), “Provide On-Site Storm Drainage Facilities and Accompanying Stormwater Drainage Plan to Prevent Surface Erosion from Discharging to Creek or River Channels.” These mitigation measures require implementation of design measures and BMPs with performance requirements.

A very strict water quality criterion (exceeding 10% above background for turbidity) was used to determine that an impact on water quality would be significant. Therefore, Impact 3.4-6 (Alternatives 2 through 5) would be significant and unavoidable. However, this conclusion does not necessarily correlate with the same findings in Section 3.6, “Earth Resources.” For Impact 3.6-1 to be significant and unavoidable, the project would likely have to elevate turbidity levels by considerably more than 10% above background levels, in a larger area and for a longer duration than the limited area and brief period used for the water quality analysis. This topic was addressed in the “Methods and Assumptions” sections in Section 3.4, “Geomorphology and Water Quality,” and Section 3.6, “Earth Resources.”

AOB31-24

The commenter is concerned about impacts of the project on scenic resources. See response to comment I6-3.

AOB31-25

The commenter states that the fen and quarry pit are hydrologically connected and is concerned that although Alternative 2 would restore the quarry and avoid the fen, the surface or groundwater hydrology of the fen would be altered or degraded. The commenter is concerned that the golf course proposed under Alternative 2 would “surround” a sensitive wetland. See Master Response Section 3.3, “Biological Resources,” and Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.” Refer to Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS for text revisions related to these topics.

AOB31-26

The commenter is concerned about impacts of Alternative 2 on wildlife. See Master Response Section 3.3, “Biological Resources.”

AOB31-27

The commenter is concerned that any change in chemical uses in areas not now occupied by a golf course pose unnecessary risks to water quality, and that present water monitoring is inadequate and mitigation needs to include additional monitoring. The comment refers to a diesel spill that occurred in 2005. See response to comment AOB31-

55 in regard to the diesel spill. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality” for a discussion of chemical use.

- AOB31-28 The commenter expresses support for Alternative 3 because of its lower water demand and reduced chemical use. The comment is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB31-29 The commenter notes that Alternative 3 would have less of an impact on biological resources. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB31-30 The commenter suggests that an alternative that would implement the general plan should have been analyzed. Consistency with the general plan is discussed in Chapter 2, “Project Alternatives,” and Section 3.1, “Land Use,” of the draft EIR/EIS/EIS. See Master Response Section 3.2, “Land Use,” for additional information.
- The baseline used for the draft EIR/EIS/EIS is existing conditions at the start of the environmental review with some additional resource information since that time to update the understanding of current conditions relevant to the environmental analysis. These existing conditions have been influenced by a culmination of both historical and ongoing activities. Where appropriate and applicable, information about existing permits, concession contracting, and consistency with the Lake Valley SRA General Plan was presented in the draft EIR/EIS/EIS, either in Chapter 2, “Project Alternatives,” or in the discussion of existing conditions in specific resource sections.
- The commenter has concerns about existing and proposed impacts related to water use. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for a discussion of water use.
- AOB31-31 The commenter states that Alternative 2 is the preferred alternative and that Alternative 5 is not evaluated at an equal level of detail. See response to comment AOB8-1 for a discussion of the alternatives evaluated for the project.
- AOB31-32 The commenter states that Alternative 3 is better than Alternative 2. The comment is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB31-33 The commenter disagrees with the methodology used in the economic analysis for the project. See Master Response Section 3.7, “Economics.”
- AOB31-34 The commenter disagrees with the scope used in the economic analysis for the project. See Master Response Section 3.7, “Economics.”
- AOB31-35 The commenter correctly notes that the goal of the project is to maintain *adequate* revenue generation from Lake Valley SRA and/or Washoe Meadows SP.
- AOB31-36 The commenter disagrees with the survey methods used for recreation surveys. As described in Section 3.8, “Recreation,” of the draft EIR/EIS/EIS, the economic feasibility analysis indicated that the survey respondents were likely to have been biased about proposed changes to be made to the golf course; a reduced-play golf course would likely appeal to a different group of golfers (HEC 2008:30–31 [Appendix E]). The limitations of the surveys conducted for the project are acknowledged in the draft EIR/EIS/EIS. In

addition to the surveys conducted at the golf course, data were obtained from the Lake Tahoe Golf Course concessionaire.

- AOB31-37 The commenter disagrees with the conclusions of the economics analysis. The commenter's support for Alternative 3 and opposition to Alternative 2 is noted. See Master Response Section 3.7, "Economics."
- AOB31-38 The commenter disagrees with the conclusions of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-39 The commenter disagrees with the conclusions of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-40 The commenter disagrees with the conclusions of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-41 The commenter disagrees with the scope of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-42 The commenter disagrees with the scope of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-43 The commenter questions the source of funding for the project. See Master Response Section 3.7, "Economics."
- AOB31-44 The commenter questions the loss of income during construction. State Parks plans to allow golfing to continue on 9 holes or potentially a modified 18-hole course throughout the construction period unless the contractor deems this infeasible.
- AOB31-45 The commenter disagrees with the conclusions of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-46 The commenter disagrees with the conclusions of the economics analysis. See Master Response Section 3.7, "Economics."
- AOB31-47 The commenter is concerned about pesticide use on the golf course. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."
- AOB31-48 The commenter is concerned about fertilizer use on the golf course. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."
- AOB31-49 The commenter is concerned that Alternative 2 would not comply with the following statement in the Water Quality Appendix to the TRPA Threshold Evaluation: "All new development must be setback from the defined extent of the SEZs..." The TRPA Threshold Evaluation is not a compliance document, but an assessment document that has not been fully adopted. This project would reduce coverage and development in the SEZ and relocation of coverage is allowed by TRPA. See response to comment AOB8-4 for additional information about the SEZ coverage evaluation.
- The commenter states that Alternative 3 would be more consistent with TRPA goals to reduce/restrict fertilizer use in SEZs. The comment is noted.



The commenter indicates that Alternative 3 would be more consistent than Alternative 2 with TRPA criteria regarding land coverage in SEZs. The comment is noted.

The commenter states that Alternative 3 would be better than Alternative 2 at meeting TRPA's restrictions from development in the 100-year floodplain. For clarification, golf course turf is not considered coverage.

AOB31-50 The commenter expresses the opinion that Alternative 3 would more closely meet TRPA goals and policies regarding restoration of disturbed lands and setbacks from SEZ/floodplain than would Alternative 2.

Alternatives 2 and 3 would both reduce the area of golf course within SEZ (to approximately 96 and 85 acres, respectively). Both alternatives would reduce the distance along the Upper Truckee River that have adjacent golf course land use: Alternative 3 would eliminate adjacent golf course land use along 6,382 linear feet (to zero) and Alternative 2 would eliminate adjacent golf course land use along 5,532 linear feet (reduced to 850 feet) (Table 2-1). Therefore, both alternatives would be consistent with the TRPA Goals and Policies regarding restoration of disturbed lands and setbacks from SEZ/floodplain.

AOB31-51 The commenter states that Lake Tahoe's designation as an "Outstanding National Resource" in the *Water Quality Control Plan for the Lahontan Region* (Basin Plan) requires additional protections from the golf course's turf management practices. The commenter is correct in noting that Lake Tahoe is a designated "Outstanding National Resource Water." This status is a key element of the control measures and waste discharge prohibitions for the protection and enhancement of Lake Tahoe contained within the Lahontan RWQCB's Basin Plan and described in the regulatory framework of the draft EIR/EIS/EIS (pages 3.4-2 to 3.4-9). The water quality control programs to protect the lake are implemented jointly by the Lahontan RWQCB, TRPA, USFS, local governments, and other parties for the California portion of the Tahoe Basin; however, the California Water Boards are ultimately responsible for implementation. The impact analysis, conclusions, and mitigation measures identified within the draft EIR/EIS/EIS fully consider the water quality requirements pursuant to Lake Tahoe's status, which are explicitly addressed by the Basin Plan.

AOB31-52 The commenter is concerned that Alternative 2 would conflict with elements of the Basin Plan requiring special control measures for golf courses, and prohibitions against chemical uses within SEZs, while Alternative 3 would eliminate this conflict. The Lahontan Regional Water Quality Control Board would make permit decisions regarding any special control measures for any golf course features that would remain within the SEZ under any of the action alternatives. The permit conditions would be consistent with, not in conflict with the Basin Plan requirements. For additional discussion of chemical management under Alternatives 2 and 3, see Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

AOB31-53 The commenter is concerned about the water quality monitoring proposed. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

AOB31-54 The commenter is concerned that indirect effects of flooding on water quality impacts were not adequately described in the draft EIR/EIS/EIS. However, the water quality impact discussion within Section 3.4 of the draft EIR/EIS/EIS does consider the risks of flooding on golf course facilities and operations as part of potential water quality effects under the analysis of Impact 3.4-8 for each alternative. The types of risks and potential magnitude

of risk for each action alternative include consideration of the area of golf course within the floodplain (see Table 2-1) and the proposed condition of the course improvements under each alternative. For clarification, the acreage of golf course within the 100-year floodplain (56 acres) would not change under Alternatives 1 and 4. The acreage of golf course facilities within the 100-year floodplain would be reduced under Alternative 2 (36 acres), Alternative 3 (10 acres), and Alternative 5 (0 acres). Therefore, indirect potential flooding effects on water quality due to flood interaction with golf course features would be beneficial in all of the action alternatives on the basis of acreage alone. The commenter's note that Alternative 3 reduces the risk more than Alternative 2 is noted. No change to the text of the draft EIR/EIS/EIS is required.

AOB31-55

The commenter states that risks such as the 1999 diesel spill by the on-site snowmobile concessionaire were not disclosed in the draft EIR/EIS/EIS. However, the water quality impact discussion within Section 3.4 of the draft EIR/EIS/EIS does consider the risks of accidental spills over the operational life of the project as part of potential water quality effects under the analysis of impact 3.4-8 for each alternative. The impact analysis notes that the Lahontan RWQCB would update the waste discharge permit for any of the action alternatives, likely updating and strengthening the monitoring and reporting requirements. State Parks and its concessionaires will work with the Lahontan RWQCB to update and implement any new waste discharge permit requirements.

AOB31-56

The commenter cites past scientific studies that indicate that golf courses contribute to the eutrophication of Lake Tahoe as a reason to prefer Alternative 3 over Alternative 2. Recent basinwide technical studies for the Lake Tahoe TMDL (California Water Boards and NDEP 2007) indicate that golf courses are one of many specific land uses that may include fertilizer uses that affect surface and/or groundwater quality.

The USACE (2003) groundwater evaluation indicates that fertilized golf course area (3.9 square kilometers [sq. km]) composes 20.5% of the total fertilized area (19 sq. km) within the Lake Tahoe Basin and their application loads that range from 3.9 to 37.1% of the total basin phosphorus and from 17.6 to 36.2% of the total for nitrogen (see page 4-19 of the TMDL tech study). The fertilized golf course areas have nitrogen and phosphorus application loads that are not dissimilar to other basin land uses with turf (e.g., residential landscaping; institutions and commercial areas).

See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."

AOB31-57

The commenter is concerned about impacts on wildlife and consistency with TRPA thresholds. See Master Response Section 3.3, "Biological Resources."

Washoe Tribe of Nevada and California  
Cultural Resources Office/Tribal Historic Preservation Office

AOB-32



Denise Jafke, Archeologist  
Washoe Meadows State Park  
P.O. BOX 266  
Tahoma, CA. 96142

September 29, 2010

Subject: Comments to the Upper Truckee River Restoration Project

Dear Ms. Jafke,

Thank you for consulting with the Washoe Tribe of Nevada and California on the Upper Truckee River Restoration (UTRR). The UTRR is within the ancestral territory of the Washoe Tribe. The Washoe Tribe has occupied the project area for thousands of years and has an interest in the preservation of the lands and how the lands are used, including the natural and cultural environments. As the original inhabitants of the Lake Tahoe Basin we have seen the destruction of the lands through mismanagement and we are depending on the land managers to make the best decision to protect and preserve the lands and fulfill their responsibilities and obligations to the people and the lands they manage.

Generally, the Washoe Tribe of Nevada and California supports the protection and preservation of the natural and cultural environments. However, I must convey my position on the project effects of the UTRR to both the natural and cultural environments as a potential result of the UTRR project.

I am disputing the "No Adverse Effect" declaration of the UTRR, Alternative Two, which addresses archeological resources. The following comments are project related effects to the cultural and natural environments of the UTRR project.

- 1 The proposed undertaking does have an adverse effect when the archeological resources that are supposed to be protected are covered and buried. The project effects will erase all evidence of Washoe archeological and heritage resources. Although the Washoe Meadows State Park (WMSP) may feel that encapsulating archeological sites is an accepted practice as protection measures, it also erases all evidence that we were ever there. The action diminishes our presence and cultural association.
- 2 It is our feeling of connection and association that will be lost. Even though we may or may not visit the archeological sites regularly, it doesn't mean we are detached from the archeological sites and just the fact that we know they are there gives us a feeling that we are still there. Our presence is still there, which keeps us connected to our heritage. We would have nothing to show our children and future generations further diminishing our relation to the land.

AOB32-1

AOB32-2

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- |    |  |          |
|----|--|----------|
| 3  | The Archeological Resources Protection Act of 1979 states archeological resources is protected. Because the project has components of federal permitting and federal funding mechanisms the project falls within the ARPA laws and guidelines.   | AOB32-3  |
| 4  | Under the National Historic Preservation Act (NHPA), 800.5 Assessment of adverse effects (a): the Washoe Tribe attaches cultural significance to the archeological resources, (1) the proposed undertaking will alter the characteristics of the archeological properties and will diminish the integrity of the property and the feeling of association. (2) The alteration of the property, (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to historic significance. | AOB32-4  |
| 5  | In the case of CA-ELD-2156; it has experienced theft and vandalism and the encapsulating process may be the only appropriate measure to protect the site. However, the Washoe Tribe would still lose our heritage and connection either through theft or by the site being buried.   | AOB32-5  |
| 6  | I feel there is a lopsided injustice when our heritage resources are buried for the recreational sport activity of a few individuals. How do you justify the lose resources and uses of one group of people for the recreational uses of another small group of people.  | AOB32-6  |
| 7  | We are opposed to the development a new portion of a golf course for the reasons provided and we prefer alternative three or four which is the river restoration and maintaining current golf course configuration.  | AOB32-7  |
| 8  | Alternative Two would have negative impacts to the ecosystem, including habitat destruction of flora and fauna, in favor of turning the landscape into a golf course. It is inconsistent for a park to damage the natural and cultural environments for which it should be protecting in favor of developing a golf course.  | AOB32-8  |
| 9  | We are concerned with the use of chemical fertilizer and herbicide applications to maintain the golf course. Fertilizer use is contributing to the degradation to water quality within the Lake Tahoe Basin. Alternative Two will increase the chemical runoff from two sides of the stream and compound the effect by two.  | AOB32-9  |
| 10 | <b>The mission of the Office of Historic Preservation (OHP) and the State Historical Resources Commission (SHRC), in partnership with the people of California and governmental agencies, is to preserve and enhance California's irreplaceable historic heritage as a matter of public interest so that its vital legacy of cultural, educational, recreational, aesthetic, economic, social, and environmental benefits will be maintained and enriched for present and future generations.</b>  | AOB32-10 |

I am requesting further consultation with the Washoe Meadows State Park to discuss possible prevention, mitigation and enhancement measures related to the Adverse Effects to the archeological resources.

Thank you and please call me at (775) 888-0936 if you have any questions.

Respectfully,

Darrel Cruz, CRO/THPO

Cc; Washoe Cultural Resources Advisory Council

- AOB32-1 The commenter disagrees with the No Adverse Effect conclusion for cultural resources. See Master Response Section 3.6, "Cultural Resources."
- AOB32-2 The commenter is concerned about losing the connection with cultural resources within Washoe Meadows SP. See Master Response Section 3.6, "Cultural Resources."
- AOB32-3 The commenter states that the project is subject to the Archaeological Resources Protection Act of 1979. See Master Response Section 3.6, "Cultural Resources."
- AOB32-4 The commenter is concerned about impacts on cultural resources pursuant to the National Historic Preservation Act. See Master Response Section 3.6, "Cultural Resources."
- AOB32-5 The commenter is concerned about losing the connection with cultural resources within Washoe Meadows SP. See Master Response Section 3.6, "Cultural Resources."
- AOB32-6 The commenter is concerned about impacts on cultural resources. See Master Response Section 3.6, "Cultural Resources."
- AOB32-7 The commenter's support for Alternatives 3 and 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB32-8 The commenter notes that Alternative 2 would have impacts on the ecosystem and cultural resources. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- AOB32-9 The commenter is concerned about increases in use of fertilizers under Alternative 2. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality."
- AOB32-10 The commenter states the mission of the Office of Historic Preservation and State Historical Resources Commission. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

# Washoe Tribe of Nevada and California

AOB-33



November 10, 2010

Cyndie Walck  
CA State Parks and Recreation, Sierra District  
PO Box 16  
Tahoe City, CA 96145

*Sent Via Email to utproject@parks.ca.gov*

Dear Ms. Walck:

The Washoe Tribe of Nevada and California appreciates the opportunity to provide these written comments on the Draft EIR/EIS/EIS for the Upper Truckee River Restoration Project. These written comments reinforce and supplement the written comments submitted by THPO Darrel Cruz in a letter dated September 29, 2010 and the oral comments made at the October 13, 2010 APC meeting and the October 28, 2010 Governing Board meetings held at the TRPA offices.

**The DEIS is insufficient because it fails to identify and address all significant impacts to cultural resources.**

The CEQA guidelines provide that, while social effects of a project shall not themselves be treated as a significant effect on the environment, the social effects resulting from a project may be used to determine the significance of the physical changes. The document suggests that, in Alternative 2, the only impacts the construction of the golf course will have on three of the Native cultural sites in the project area will be disturbance and destruction of the site itself. This completely misses an important significant impact: the elimination of the Tribe's access to these sites.

The access issue is significant for a number of reasons. First, there are not many sites left on public lands for the Tribe to access. Second, the sites in the project area are easily reached by elders, who are often in poor health if not legally disabled. It does the Tribe no good to have access to sites that are at the top or at the bottom of a steep grade if the elders, who are the keepers of the Tribe's cultural history and knowledge, cannot physically reach them to teach the younger generations.

**The DEIS is insufficient because the mitigation proposed for Alternative 2 fails to address all impacts to cultural resources.**

The proposed mitigation measures will not mitigate the effect Alternative 2 will have on the cultural resources in the project area. Under Alternative 2, State Parks proposes to (1) when feasible, design the golf course so as to avoid those sites and (2) where design changes are not

AOB33-1

AOB33-2

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feasible, encapsulate the sites. Avoiding the site altogether is only contemplated for one site. That being said, the proposed mitigation for this site is also unacceptable because access and use of the site will continue to be effected in a significant manner. Tribal members and tribal organizations such as the Washoe Cultural Resources Advisory Council will likely have to count on the good will of the golf course concessionaire to allow them access the site. Additionally, the tribal members attempting to cross the golf course while it is in use will face safety hazards. While the Tribe appreciates the State Park's offer to avoid disturbing the sites, the fact is, this mitigation measure does not reduce the impact to the site to less-than-significant. As a practical matter, the Tribe can't access sites that are in the middle of a golf course.

The mitigation measures suggested for other sites, encapsulating the sites, eliminates the Tribe's ability to access the sites altogether. The possibility of deeding the sites into permanent conservation easements is not explored thoroughly. This is insufficient.

The DEIS makes an attempt to lessen the blow to the Tribe by stating that the final design for the golf course is not yet completed and that it will work with the Tribe to design the course to lessen the impact on cultural resources. With all due respect, given the history of the Lake Tahoe basin, the Tribe can not accept unenforceable assurances that the impact to cultural resources will be sufficiently reduced and they will be able to properly access those sites. As it stands, the current project design results in significant impacts to cultural resources that are not resolved via the proposed mitigation measures.

**The DEIR insufficiently discusses the cumulative effects to Washoe cultural resources.** The CEQA Guidelines state that "(a)n EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable, as defined in section 15065(a)(3)". [ § 15130(a)] "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Under the Guidelines, it does not matter that the State Parks is not wholly responsible for what has happened to Washoe cultural resources in the Basin. What matters is the fact that the effect of a physical change to the environment, when viewed in light of other past and future physical changes to the environment, are significant.

It is well known that the cumulative effect of past projects on Washoe cultural resources has been to decimate those resources. In today's common parlance, each Washoe family was a second home owner at Lake Tahoe. Each spring, extended family groups would move back up to the Lake and live in these summer homes. The Washoe Tribe knew the Basin intimately. They knew the best locations for summer homes and the best places to take advantage of and develop the Basin's resources. When their lands were taken from them, it is no surprise that the best places were the first to go. The Tribe was pushed to the margins of non-Native society, to lands and places that were deemed undesirable. As a result, the vast majority of significant Washoe cultural resources have been buried and now reside under resorts, marinas, houses and yes, golf courses. Without a doubt, there were significant resources that were destroyed in the current project area when the river was straightened, when the golf course was put in, when the sewer lines were installed, when the quarry was developed and in short, when the ground in the project area was disturbed. The fact that significant cultural resources exist in the project area and that these resources are accessible to the Tribe is nothing short of amazing when you consider the history of the Basin and of the area. Again, the DEIS fails to consider this fact entirely by proposing mitigation measures

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AOB33-2  
cont.

AOB33-3

that will increase the detrimental impact on those resources, not reduce it.

Again, State Parks could argue that the design of the golf course is not yet final and that the Tribe's access might not be eliminated. The Tribe finds speculation reassurances unacceptable and out of compliance with NEPA, CEQA and the TRPA Code of Ordinances. The Final EIR must include mitigation measures that will reduce the impacts described in this comment letter to a less than significant level. In other words, Alternative 2 must include a golf course design that does not significantly impact cultural resources. If that is not done, before State Parks can implement the project, it must issue a "statement of overriding considerations" explaining why the impact to the Tribe's resources is justified.

AOB33-3  
cont.

**Mitigation Techniques proposed to lessen impact on as yet unknown cultural resources during ground disturbing activities must be modified to lessen the impact on cultural resources.** The Tribe appreciates the fact that mitigation technique (c) provides that Washoe monitors *may* be employed when ground is disturbed for the project. The Tribe insists, however, that Washoe monitors *must* be hired. Washoe monitors will be most able to identify the significance of disturbed cultural resources and implement corrective action as soon as possible. Too often, the Tribe finds out about resources that are disturbed well after the fact and after they have been significantly impacted. This probable outcome must be avoided.

AOB33-4

**The proposed mitigation for human remains discovered during construction is insufficient.** The document states that, should human remains be found during ground disturbing activities, the El Dorado County Coroner and a professional archaeologist will be contacted to determine the nature and extent of the remains. Only if the coroner and the archaeologist determine that the remains are Native will processes be put in place to contact the Tribe. This is unacceptable. The THPO should be contacted immediately after human remains are found to enable him to assist in determining whether or not the remains are Washoe and what appropriate steps should be taken. The Tribe must be notified at the earliest possible moment.

AOB33-5

#### Conclusion

For all of the reasons stated above, the Draft EIS is insufficient. California State Parks was given contact information for the Legal Department almost a month ago in an attempt to start resolving these issues. As of yet, State Parks has not made contact to start this process. The Tribe looks forward to hearing from State Parks in very short order and engaging in consultation to resolve the identified issues.

Sincerely,



Waldo W. Walker  
Chairman

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- AOB33-1            The commenter states that the draft EIR/EIS/EIS does not address all impacts on cultural resources. See Master Response Section 3.6, “Cultural Resources.”
- AOB33-2            The commenter states that mitigation proposed for impacts of Alternative 2 on cultural resources is inadequate. See Master Response Section 3.6, “Cultural Resources.”
- AOB33-3            The commenter states that the discussion of cumulative impacts on cultural resources is inadequate. As described in Section 3.16, “Cumulative Impacts,” of the draft EIR/EIS/EIS, even with protective regulations, cultural resources are still degraded or destroyed as cumulative development proceeds in the Tahoe Basin. This statement acknowledges the existing significant cumulative effect on cultural resources in the basin; however, with implementation of mitigation, the project would not make a considerable contribution to that significant cumulative effect. See Master Response Section 3.6, “Cultural Resources,” for a discussion of proposed mitigation measures.
- AOB33-4            The commenter is concerned about monitoring proposed in cultural mitigation. See Master Response Section 3.6, “Cultural Resources.”
- AOB33-5            The commenter is concerned about proposed cultural mitigation. See Master Response Section 3.6, “Cultural Resources.”

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## **SECTION B**

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Individuals

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**Upper Truckee Restoration and Golf Course Reconfig**

John Adamski [jvaski@sbcglobal.net]

**Sent:** Monday, November 15, 2010 3:12 PM

**To:** Project, Upper Truckee

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Hi,  
My name is John Adamski .  
I attended one of your public meetings at the Country Club .

After hearing your presentation and walking the proposed golf course reconfiguration - I wish to voice my concerns.

It appears that not enough water testing for pollutants was conducted by an impartial testing agency prior to making decisions to proceed with this. I reccomend at least 5 years monitoring of the true run-off to Tahoe though this river. I question what if enough has been done previously to regulate the golf course's use of fertilizer etc. Relocating the golf course to unimproved forest closer to neighborhoods will take away even more land that serves as a quiet recreational area for hikers, mtn bikers, and x-country skiers. We already lack enough "natural buffers" in and around our neighborhoods. Furthermore, it seems somewhat ridiculous for the State Parks to propose such a tremendously expensive project for questionable results during a period of unquestionable recession for Californians. I estimate the real figure of unemployment in this community to be beyond 20%. Many of us look at and use "grant-funding" as "free money" for these types of projects - when in fact we all pay for this with federal and state taxes. I personally think State agencies should trim-back at this time and show that they take some responsibility in correcting this devastating recession.

I1-1

I1-2

It is for these reasons I recommend shelving all phases of improvements for this project until the economy substantially improves, and we have enough water/ pollutants monitoring for enough years to make sound decisions. And, after five years of monitoring is completed - we might re-visit this project to determine if possibly we could make simple incremental imporvements at less expense to achieve our goals. One such minor improvement might be simply to narrow the existing fairways near the river to create a wider natural buffer from the course.

Thank you for listening to my concerns .

Sincerely, John Adamski

- I1-1                    The commenter has concerns about impacts of fertilizer use. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- I1-2                    The commenter has concerns about recreation access and funding. The commenter recommends more monitoring and minor improvements to the golf course. The suggestions are noted. See Master Response Section 3.5, “Recreation,” and Master Response Section 3.7, “Economics.”



**I Support Alternative 5 for the Upper Truckee**

Eric Adema [eadema@yahoo.com]

**Sent:** Monday, November 01, 2010 8:07 PM

**To:** Project, Upper Truckee

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I strongly urge that the Department of Parks and Recreation choose Alternative 5 for the Upper Truckee River Restoration & Golf Course Decommissioning Project.

The continued deterioration of the Upper Truckee cannot continue. Its health is vital to habitat, fish and Lake Tahoe.

By decommissioning or moving the golf course away from the river, Alternative 5 will arrest this deterioration. Its a lasting solution that will benefit the river and the broader Tahoe ecosystem.

Eric Adema

I2-1

I2-1

The commenter's support for Alternative 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



Dear Ms. Cyndie Walck,

I am a nature lover. I don't like this idea of destroying a wildlife ecosystem for any reason, especially golf. I've been in the meadow at all times of the season and hours of the day and night. I've watched owls hunting mice and voles at dusk. I've followed coyote tracks in the snow to where they pounced on the small prey that lives in the meadows under the snow. I've seen perfect impressions of hawk wings left in the snow where they dove, impacting the spot where they caught their prey.

These animals are small and seem insignificant, but they are part of the web of life. I don't need to be a wildlife biologist to know that they can't live on a golf course. The foods that small prey animals eat are in the diversity of the plants and insects that eat the plants. All this would be eradicated for a perfect green lawn. Where will the owls and hawks go? I know the coyotes will be going to the neighborhoods more then they do now.

I know some would love to boast about the bigger better golf course if that move ever happened and how good for Tahoe's economy it would be, but I doubt that it would make any difference to Tahoe businesses. The business that golfers and their shopping wives brought to South Lake didn't save Mikasa, Wranglers, High Sierra books, Neighbors Book Store, countless restaurants and businesses that I have seen close down while their store fronts remain vacant to this day.

There are enough golf courses at Lake Tahoe. I oppose Alternative 2. Keep the golf course where it is. The environment there is already destroyed. Leave the wilderness of Washoe Meadows State Park alone.

I support Alternative 4 if the need for revenue is so great.

Sincerely,

Daniel Albanese

[daniel.albanese@gmail.com](mailto:daniel.albanese@gmail.com), 829 Kiowa Drive , South Lake Tahoe, CA, 96150

I3-1

I3-1

The commenter's opposition to Alternative 2 and support for Alternative 4 is noted. The commenter has concerns about the baseline conditions used for analysis of wildlife habitat and about effects on the region's economy. See Master Response Section 3.3, "Biological Resources," and Master Response Section 3.7, "Economics."

Comments to Upper Truckee River Restoration and Golf Course Reconfiguration Project

I4

Dear Ms. Cyndie Walck,

I am Jenny Albanese, an analytical chemist (Ph.D.), neighbor and member of the Washoe Meadow Community. I like to comment on the Upper Truckee River Restoration and Golf Course Reconfiguration Draft EIR/EIS. The efforts by California State Parks to restore a very important section of the Upper Truckee River are very welcome.

Since the Upper Truckee River supplies approximately 40% of the water flowing into Lake Tahoe, I am a strong supporter of its restoration to reduce erosion, fine sediment and nutrients into the Upper Truckee River and finally Lake Tahoe.

However, I do oppose the State Parks department presented and preferred alternative 2 for the following reasons:

- Alternative 2 would impact the environment by turning raw undeveloped forested land into a developed golf course and increasing the size of the golf course from 133 acres to 156 acres. The new location and size of the golf course would have an input and effect on water quality, soils, vegetation, recreation, wildlife and their habitats as well as cultural resources.
- Despite bisecting wildlife habitats and limiting wildlife access to the river, the 200-300 feet proximity to the propose golf course (alternative 2) does not prevent that toxic herbicides, fertilizers and pesticides will find their way into river or sensitive fen area through runoff or groundwater collection. Do we need to have another 100 year flooding situation, such as the year 1997, after which the golf course had to repair damaged cart paths and roads, to demonstrate the potential danger on how chemicals and toxic components can enter the river and therefore end up in Lake Tahoe? No, we don't, because even moderate flooding would cause this.
- There is about 6382 linear feet of golf course along the Upper Truckee River this close proximity to the river would approximately double with the new proposed golf course location. Potential flooding and typical surface runoff or collected ground water will significantly increase (almost double) the level of applied chemicals such as granulated lime stone (CaCO3) or Gypsum (CaSO4). These chemicals and others are currently used. Lime stone is applied in lbs/m ranging from 25-100 according to the golf course soil tests from 2000-2009. Furthermore, soil Test and Recommendation Reports dated 1/14/09 obtained through Public Records Act requests, indicate recommended rates of application of nitrogen that are twice as much as would be advisable for the Tahoe basin. In addition, the

I4-1

I4-2

I4-3

recommended rates of application of phosphorus are also too high. The company preparing the report is located in Ohio and is likely not familiar with Tahoe area regulations and conditions including the short season of play.

14-3  
cont.

- These examples demonstrate that we need better requirements for soil testing than just trust best promised golf course maintenance practices. Soil testing is not required to be reported to the Lahontan Regional Water Quality Control Board (LRWQRB).
- According to the draft EIR/EIS/EIS Volume 1, Section 1.1.1, Lake Tahoe is a designated Outstanding National Resource Water and its clarity has declined due to the delivery of fine sediments from various watersheds in the basin as well as due to "increased phytoplankton productivity, which in turn has been attributed to an increase in nutrients, especially nitrogen and phosphorous." Numerous scientific papers reference concerns about the fertilizers used on golf courses and their effects on water quality and ecosystem health. An example is the Reference 4 article, which mentions that golf courses are contributing to the eutrophication of Lake Tahoe, which is "a process whereby water bodies, such as lakes,... receive excess nutrients that stimulate excessive plant growth (algae,...etc.)."
- We have to rethink and reevaluate the problems occurring with such close proximity to the Upper Truckee River of a bigger golf.
- It becomes even more evident and concerning, when looking at **process of monitoring water quality, which is not analytical and robust**. While the practices may meet most legal requirements, the issues with the process erode confidence that pollutants are kept from the Upper Truckee River.
  1. There are only a few water monitoring stations. According to Reference 1, page 1: "*The Monitoring and reporting program established two surface water monitoring and three monitoring wells.*" The monitoring locations were established in 1989. Since that time, advances analytical technology for water monitoring would dictate additional monitoring stations and methods in an area of such high sensitivity. Close monitoring of the effects of the golf course on the Upper Truckee River are important from the aquatic habitat standpoint as well as for the maintenance of the clarity of Lake Tahoe. The situation relies too much on actions taken by the Golf Course and there is little monitoring by LRWQCB.
  2. Monitoring does not take place at peak watering periods in the summer. LRWQCB has requested monitoring at this time period (Reference 2). Instead water samples were taken in May or November, when obviously less pollutant are expected due to snow coverage or after a long winter periods. We need less self regulation of the golf course, in order to keep Lake Tahoe clean.
  3. Who takes the samples and what are their qualifications is not specified. The document with requirements on this is Reference 3.

14-4

14-5

14-6

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14-8

Appendix A, page 2 merely requires that the sample collector's name be provided along with the date, and information about the analyses. Due to the sensitivity of potential pollutant discharge to the Upper Truckee River, strict requirements for sampling personnel and sampling protocol should be provided. This would be consistent with the best practices implemented at Squaw Creek Golf Course. This is not the case for the current golf course and therefore not an analytical procedure, which requires consistency. For examples water samples are taken from the same location, same water depth, same times to plot trends and represent a real analytical picture of chemicals and toxic herbicides, fertilizers and pesticides.

14-8  
cont.

4. There are concerns about water sources for the golf course irrigation and golf course facilities. The golf course is already using water diverted from the Upper Truckee River. Any new well could harm the river and meadow ecosystems in the Park including fish habitat and its unusual fens. More water would be used in alternative 2 to keep the course green, a new well could potentially lower the water levels, which is concerning particularly in drought times.

14-9

- Therefore, I support Alternative 3, in which the floodplain would be more fully restored compared to Alternative 2.
- I like to emphasize, that I strongly oppose Alternative 2 and urge the State Parks System, TRPA, and the Bureau of Reclamation to choose Alternative 3, which would allow Washoe Meadows State Park to remain an intact viable ecosystem, wildlife habitat, and recreational resource for the community and visitors to Lake Tahoe. I understand the economic pressure for maintaining a Reduced-Play Golf Course, but I support stricter and more analytical robust procedures and regulations to monitor water quality and to test soil for the existing golf course.

14-10

Sincerely,  
Jenny Albanese

[Jenny.albanese09@gmail.com](mailto:Jenny.albanese09@gmail.com), 829 Kiowa Drive, South lake Tahoe, CA, 96150

References:

1. California Regional Water Quality Control Board, Lahontan Region, Board Order No. 6-00-48, WDID No. 6A098811003, Updated Waste Discharge Requirements for California Department of Parks and Recreation and American Golf Corporation, Lake Valley State Recreation Area, June 14, 2000.

2. Water quality monitoring records obtained by Public Records Act request from Lahontan Regional Water Quality Control Board
3. California Regional Water Quality Control Board, Lahontan Region, Board Monitoring and Reporting Program 6-00-48 for California Department of Parks and Recreation and American Golf Corporation, Lake Valley State Recreation Area, June 14, 2000.
4. Primary Productivity, Nutrients, and Transparency During the Early Onset of Eutrophication in Ultra-Oligotrophic Lake Tahoe, California-Nevada, Author: Charles R. Goldman, Source: Limnology and Oceanography, Vol. 33, No. 6, Part 1: W.T. Edmondson Celebratory Issue (Nov. 1988), pp. 1321-1333

- I4-1 The commenter has concerns about the proposed golf course reconfiguration and impacts on water quality, wildlife habitat, recreation access, and cultural resources. See the following response to comment and master responses:
- ▶ response to comment AOB4-5 and Master Response Section 3.3, “Biological Resources,” for discussion on golf course reconfiguration and wildlife habitat;
  - ▶ Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for discussion on water quality and erosion;
  - ▶ Master Response Section 3.5, “Recreation” (the commenter does not state the recreation impact); and
  - ▶ Master Response Section 3.6, “Cultural Resources” (the commenter does not state the cultural resources impact).
- I4-2 The commenter is concerned that the golf course’s chemical use and infrastructure (e.g., cart paths) pose potential water quality problems in relation to river flooding processes. See response to comment AOB31-54.
- I4-3 The commenter has concerns about impacts related to herbicides, fertilizers, pesticides, and flooding. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for a discussion on herbicides, fertilizers, pesticides, and flooding. Commenter states the golf course along the river would double. This project would reduce the amount of the golf course directly adjacent to the river from 6,382 linear feet to 850 linear feet and reduce the area of the golf course in the floodplain and in SEZ.
- I4-4 The commenter suggests testing the soil. The suggestion is noted. State Parks and its concessionaire will work with the Lahontan RWQCB to update the golf course’s chemical application and management plan as needed to update permit requirements for golf course operations.
- I4-5 The commenter is concerned that Lake Tahoe’s designation as an Outstanding National Resource Water and its reduced clarity require special protection from golf course turf management. See response to comment AOB31-51.
- I4-6 The commenter has concerns about the water quality monitoring program. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- I4-7 The commenter has concerns about the water quality monitoring program. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- I4-8 The commenter has concerns about the water quality monitoring program. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”

- I4-9 The commenter has concerns about impacts related to the existing well. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for discussion of the existing well.
- I4-10 The commenter’s opposition to Alternative 2 and support for Alternative 3 is noted. The commenter summarizes comments addressed in letter I4 above.



**Kudo's to Cyndie Walck and All:**

I appreciate the enormous effort put forth by Cyndie Walck and her colleagues at the CA State Parks in developing these alternatives. I agree that the river needs restoration work and that it is important to maintain recreational opportunities in the Washoe Meadows State Park and the neighboring state recreation area.

**Give equal consideration and effort to both Alternatives 2 and 4**

It appears from my reading of the EIS that the planners have shown a preference for alternative #2 that may have led to an inadequate development of the possibilities for successful compromise between the primary interest groups. Those groups are: The river restoration folks, the golf enthusiasts and golf inc., the other recreational users of the state park (hikers, cyclists, runners, x-c skiers, and equestrians), and last but not least: the natural landscape/habitat and the wildlife that lives there!

If the same wonderful restoration efforts described for alternative #2 were applied to alternative #4, then alternative 4 becomes a much more viable option and could be a working compromise for the primary interest groups. If we can excavate and recover 2500 feet of old river channels for alternative 2 then we can do it for alternative 4 and avoid moving the back 9 holes to the West side of the river. In essence, why can't we move the river to the West and North, out of the golf course, into it's historic channels instead of moving golf course into the park.

Excerpt from draft EIR:

Under Alternative 2, the new channel would incorporate sections of the existing channel, re-activate historic meanders, and construct new sections of channel. This combination would give the desired sinuosity and slope.

Approximately 4,240 feet of the existing channel would be used without modification, 5,000 feet of the existing channel would be modified (as described below), 2,490 feet of historic channel remnants would be reconnected, and 1,700 feet of new channel would be constructed

**Specific suggestions for improving Alternative #4**

1. This plan deserves credit for minimizing the impact on aesthetic and recreation values of Washoe Meadows State Park while partially restoring the river system. This alternative is the best option for maintaining the values intended when the TRPA and State Parks acted to establish this wonderful gem of a park.
2. This option should include a greater effort to perform Geomorphic restoration along the reaches of river that are far enough away from the current golf course. The 1500 foot stretch from RS 7500 to RS 6000 is the most significant example. This section is far enough away from the existing golf course to allow complete restoration without changing the golf course.
3. **Re-activate historic meanders:** At the RS 8600 there is an old river channel to the west of the current channel that could be used to completely avoid the notorious erosion site near the bridge at RS 8000. Redirecting the river to the west

at this old natural channel (please see photos) would avoid holes 6 and 7 and eliminate the need for 2 problem bridges. This change in course would enable complete restoration of the river upstream from hole 14 at RS 5900. This single change, when combined with reaches of the river in the park and not adjacent to the existing golf course, would enable restoration of fully **two thirds** of the river footage in the state park: 8000 feet (from RS 0 to RS 2000 and from RS 5900 to RS 12000).



Historic Channel at Bridge for hole #7 RS 7600



The same Historic Channel at RS 7750

4. Near RS 6000 there are additional old river channels to the north that could be used to divert the river 300 feet north of hole 14 and the tee for 15 allowing for more complete geomorphic river restoration with a wide flood plane.
5. With a more sinuous design curving back to the north at RS 5100, once again taking advantage of old river channels that require moderate excavation, the river could be redirected to the north of the tee for hole 17. The tees for hole 17 could be moved 150-200 feet along the shot line to the southeast to allow more room to shape the river banks and create geomorphic restoration. The bridge to hole 17 can now be eliminated.
6. In the region of RS 4400 to RS 4600 there are additional channels of a sinuous nature that curve to the north. In this reach we could take advantage of the old course of the river to avoid holes 12 and 18 completely as the river is diverted to the north into the meadow that was restored in 1997 along Angora creek. The restored river channel would join Angora creek at a point due north of RS 4000.
7. One more bridge can now be eliminated between hole 12 and tee 13

8. With a combined Angora creek and Truckee river course upstream from holes 10 and 11 a single bridge could be used to cross the river, parallel to and between the shot lines of holes 10 & 11
9. Below the line of hole 10 is the 2000-foot mark. From here to highway 50 restoration of the river should be identical to that proposed in option #2.
10. The length of present river channel addressed here and in option #2 is 6600 feet (from RS2000 to RS 8600). The changes outlined above would add several hundred feet to the river length, allowing for decreased velocity, a lower percentage slope, and a more natural flood plain.
11. To maintain interest and challenges for the golf course, ponds could be kept in areas removed from active river flow rather than completely filling them with soil.
12. Take advantage of the land available for restoring the river that is already a part of Washoe Meadows State park to the West and North of the golf course.
13. Restore all reaches of the river upstream of the golf course from RS8600 to RS12000. There are several large erosion sites with no golf course to limit restoration. See photos: Restoration efforts in this area is not in conflict with any wildlife, or recreational uses, including the existing golf course and yet improving this stretch of the river with complete Geomorphic Restoration is essential to the success of any restoration efforts further downstream adjacent to the golf course.



**Eroding Bank at RS 9100**



Eroding Bank at RS 9300



Eroding Bank at RS 10000

### **TRAILS**

**A quote from alt #4:**

The gravel road on the west side of the river is used by the STPUD as a required maintenance road for its subsurface sewer line in that area. No new public trails would be constructed on the east side of the river, and no tie-in would be made with the Sawmill Bike Path. The golf course bridges would remain closed to non-golfing public use.

**14. Please, do not punish recreation users by limiting trail and access improvements with this option. Why are you not including some of the same trail improvements designed to help make alternative #2 so attractive. Do you really only want to include trail improvements if you get alternative #2 approved?**

- a. Add recreational user access across the river: the new bridge described for alternatives #2 and #4 and make the connection to the bike trail via Country Club Drive.
- b. Or, build a bridge connecting Washoe Park to Tahoe Paradise Park, (upstream at about RS 11200), thus connecting two parks. The bridge could be of much lighter construction as it no longer needs to carry golf carts.

- c. Improve the trails along the river and work to limit duplicate trails serving the same zone.
- d. Add a smooth surface of sand, dirt or chips to the rocky surface of the STPUD access road to make it safe and functional for all recreational users. The materials are already stored nearby in the park.



Let's work Together... Take another sincere look at improving this Alternative:  
With some or all of the above modifications this alternative can become the win/win/win solution for River restoration, golf course improvements, minimal disturbance of the natural state of Washoe Meadows State Park, and continuation with modest improvements to for all other recreational users of the park.

Thank you for your time and attention to ideas and recommendations.

I will submit further comments on Alternative #2 in another email.

Rick Alexander  
927 Mountain Trout Dr  
S. Lake Tahoe Ca 96150  
alex1956@sbcglobal.net



Letter  
I5  
Response

Rick Alexander  
October 27, 2010

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I5-1

See responses to letter I6. The letter was attached to letter I6.

Rick Alexander  
 927 Mountain Trout Dr  
 S. Lake Tahoe Ca 96150  
 alextahoe@sbcglobal.net

**Comment on the EIR/EIS regarding the Alternative #2  
 ("The preferred alternative" p. 6 scoping document)**

Cyndie Walck and her colleagues at the CA State Parks appear to have good intentions with this, their 'preferred alternative' for river restoration and improvement of golf recreation. Their effort to improve trail access between Washoe Meadows State Park and the adjoining area is also a positive development. I agree that the river needs restoration work and that it is important to maintain recreational opportunities in the Washoe Meadows State Park and the neighboring state recreation area.

However, there are several unresolved issues with alternative #2:

- 1. The conversion of State Park lands to state recreation area lands for the purpose of development of golf course facilities appears to be in violation of the statutes from CA State Legislature that established this particular state park and the public resources code that defines state parks:**

EXCERPTS FROM CHAPTER 1470 STATUTES OF 1984-CA  
 LEGISLATURE:

SEC.2. (a) The sum of \$5,697,000 is hereby appropriated.. ...  
 (1) \$5,010,000 to the Wildlife Conservation Board for the acquisition of real property... (Washoe Meadows State Park)  
**...in order to acquire as state lands an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadow, and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed through which the Upper Truckee River supplies approximately 40% of the water flowing into Lake Tahoe...**

Definition of "State Parks" -- Public Resources Code Section 5019.53.  
 State parks consist of relatively spacious areas of outstanding scenic or natural character, oftentimes also containing significant historical, archaeological, ecological, geological, or other similar values. **The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of ecological regions of California,** such as the Sierra Nevada, northeast volcanic, great valley, coastal strip, Klamath Siskiyou Mountains, southwest mountains and valleys, redwoods, foothills and low coastal mountains, and desert and desert mountains. **Each state park shall be managed as a composite**

16-1

**whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established.** Improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. Improvements may be undertaken to provide for recreational activities including, but not limited to, camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as those improvements involve no major modification of lands, forests, or waters. **Improvements that do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks.**

I6-1  
cont.

**The statute and code quoted above appear to prohibit the building a golf course on state park land.**

**The approval of the state legislature should be required to convert or trade land between State Parks and SRA.**

**2. This land exchange would create a devastating fracture in the continuity of Washoe Meadows State Park.** The idea of a land exchange sounds good initially, but this particular land exchange, converting state park lands to SRA, fractures some of the best features of Washoe Meadows State Park, destroying habitat and blocking both recreational and wildlife corridors between the main body of the state park and the Upper Truckee River. We should be restoring this area rather than building a new area of golf development.

I6-2

**3. If you go forward with this alternative it should be revised** to improve preservation of recreation and scenic resources by building a more natural style golf course with minimal traditional turf and most of the natural plants preserved. Minimize the cutting of trees and narrow the fairways to preserve the natural features and make the course challenging.

I6-3

**4. The proximity of holes 6 & 14 to the river is not compatible with the river restoration goals.** Move the portion of the golf course adjacent to the new bridge away from the river a minimum of 100 to 200 feet. The cart path can cross the river without holes and tees for #6 and #14 being so close to the river.

I6-4

5. **Maintain a buffer of native vegetation**, especially native trees, between meadow and trail areas in the state park and any golf course development. Mitigate your damages to the scenic splendor of this state park by requiring these buffers in the planning and approval process. Move the lines of holes 7 through 13 closer together to enable increasing the size of these buffers. Move the recreational trails further away from the new golf course area wherever possible. For example: the trail from the "old barn" to the river area (RS 9500) could be moved to the west side of the meadow and still line up with the pathway between holes 8 and 12. 16-5

6. **Separate golf cart paths from recreation trails.** Hikers, horseback riders, mountain bikers and other recreational users would be put at risk if they are forced to share a trail or bridge with golf carts. 16-6

7. **The trail crossing the golf course between holes 8 & 12 should have a 200-300 foot wide buffer of native vegetation...** a natural break in the golf course to maintain a natural scenic quality for this corridor and to improve safety, separating non-golf recreation users from the threat of being hit by golf balls. This trail should not be accessible to golf carts. 16-7

8. **Build separate bridges over the Truckee River for golf and non-golf recreation users.** Move the bridge for hikers, cyclists and all non-golf recreational users away from the golf course, locate it near **RS 6300** to reduce conflicts with golfers, flying golf balls and carts. 16-8

9. **The new trail along the river should be moved as far away from the golf course as possible...** and as close to the river as feasible. Keep in mind that a view of the golf course is not "scenic" by State Park standards. Such scenery is more appropriate in an urban greenbelt park. 16-9

10. Include horseback riding in your recreational and trail considerations. 16-10

**11. Economic damages:**

**From Alt #2 CONSTRUCTION SCHEDULE**

"In Year 2, golf play could be located on the western 9 holes constructed in Year 1 if vegetation is properly established or the golf course may need to be completely shut down in Year 2. Year 2 would include reconfiguring the existing golf course and upgrading irrigation for play in Year 3." 16-10

**Annual revenue loss with this closure would be around \$3,000,000,** according to figures in the economic feasibility study in the appendix. This would be devastating to the sensitive economy of S. Lake Tahoe, resulting in unemployment and subsequent damages to community as a whole. These damages are not acceptable.

**Let's work Together...**

Your premature preference for alternative #2 has created a skewed development of the other alternatives, making alternative two the only viable option for TRPA approval. You need to mitigate the damages caused to the other alternatives in this skewed planning process and restore the viability of the other alternatives. (Please see my previously submitted comments on alternative 4 included as here as an addendum below)

I strongly encourage you to put the same effort given to alternative #2 into alternatives #3 or #4 and create a win/win/win solution for River restoration, golf course and recreation improvements, with minimal disturbance of the natural state of Washoe Meadows State Park.

Thank you for your time and attention to these ideas and recommendations.

Rick Alexander  
927 Mountain Trout Dr  
S. Lake Tahoe Ca 96150  
[alextahoe@sbcglobal.net](mailto:alextahoe@sbcglobal.net)

16-11

Addendum: Previously submitted comments on Alternative #4:

**Kudo's to Cyndie Walck and All:**

I appreciate the enormous effort put forth by Cyndie Walck and her colleagues at the CA State Parks in developing these alternatives. I agree that the river needs restoration work and that it is important to maintain recreational opportunities in the Washoe Meadows State Park and the neighboring state recreation area.

Give equal consideration and effort to both Alternatives 2 and 4

It appears from my reading of the EIS that the planners have shown a preference for alternative #2 that may have led to an inadequate development of the possibilities for successful compromise between the primary interest groups. Those groups are: The river restoration folks, the golf enthusiasts and golf inc., the other recreational users of the state park (hikers, cyclists, runners, x-c skiers, and equestrians), and last but not least: the natural landscape/habitat and the wildlife that lives there!

If the same wonderful restoration efforts described for alternative #2 were applied to alternative #4, then alternative 4 becomes a much more viable option and could be a working compromise for the primary interest groups. If we can excavate and recover 2500 feet of old river channels for alternative 2 then we can do it for alternative 4 and avoid moving the back 9 holes to the West side of the river. In essence, why can't we

16-12

move the river to the West and North, out of the golf course, into it's historic channels instead of moving golf course into the park.

Excerpt from draft EIR:

Under Alternative 2, the new channel would incorporate sections of the existing channel, re-activate historic meanders, and construct new sections of channel. This combination would give the desired sinuosity and slope.

Approximately 4,240 feet of the existing channel would be used without modification, 5,000 feet of the existing channel would be modified (as described below), 2,490 feet of historic channel remnants would be reconnected, and 1,700 feet of new channel would be constructed

**Specific suggestions for improving Alternative #4**

1. This plan deserves credit for minimizing the impact on aesthetic and recreation values of Washoe Meadows State Park while partially restoring the river system. This alternative is the best option for maintaining the values intended when the TRPA and State Parks acted to establish this wonderful gem of a park.
2. This option should include a greater effort to perform Geomorphic restoration along the reaches of river that are far enough away from the current golf course. The 1500 foot stretch from RS 7500 to RS 6000 is the most significant example. This section is far enough away from the existing golf course to allow complete restoration without changing the golf course.
3. **Re-activate historic meanders:** At the RS 8600 there is an old river channel to the west of the current channel that could be used to completely avoid the notorious erosion site near the bridge at RS 8000. Redirecting the river to the west at this old natural channel (please see photos) would avoid holes 6 and 7 and eliminate the need for 2 problem bridges. This change in course would enable complete restoration of the river upstream from hole 14 at RS 5900. This single change, when combined with reaches of the river in the park and not adjacent to the existing golf course, would enable restoration of fully **two thirds** of the river footage in the state park: 8000 feet (from RS 0 to RS 2000 and from RS 5900 to RS 12000).

16-12  
cont.



**Historic Channel at Bridge for hole #7 RS 7600**



The same Historic Channel at RS 7750

4. Near RS 6000 there are additional old river channels to the north that could be used to divert the river 300 feet north of hole 14 and the tee for 15 allowing for more complete geomorphic river restoration with a wide flood plane.
5. With a more sinuous design curving back to the north at RS 5100, once again taking advantage of old river channels that require moderate excavation, the river could be redirected to the north of the tee for hole 17. The tees for hole 17 could be moved 150-200 feet along the shot line to the southeast to allow more room to shape the river banks and create geomorphic restoration. The bridge to hole 17 can now be eliminated.
6. In the region of RS 4400 to RS 4600 there are additional channels of a sinuous nature that curve to the north. In this reach we could take advantage of the old course of the river to avoid holes 12 and 18 completely as the river is diverted to the north into the meadow that was restored in 1997 along Angora creek. The restored river channel would join Angora creek at a point due north of RS 4000.
7. One more bridge can now be eliminated between hole 12 and tee 13

16-12  
cont.



8. With a combined Angora creek and Truckee river course upstream from holes 10 and 11 a single bridge could be used to cross the river, parallel to and between the shot lines of holes 10 & 11
9. Below the line of hole 10 is the 2000-foot mark. From here to highway 50 restoration of the river should be identical to that proposed in option #2.
10. The length of present river channel addressed here and in option #2 is 6600 feet (from RS2000 to RS 8600). The changes outlined above would add several hundred feet to the river length, allowing for decreased velocity, a lower percentage slope, and a more natural flood plain.
11. To maintain interest and challenges for the golf course, ponds could be kept in areas removed from active river flow rather than completely filling them with soil.
12. Take advantage of the land available for restoring the river that is already a part of Washoe Meadows State park to the West and North of the golf course.
13. Restore all reaches of the river upstream of the golf course from RS8600 to RS12000. There are several large erosion sites with no golf course to limit restoration. See photos: Restoration efforts in this area is not in conflict with any wildlife, or recreational uses, including the existing golf course and yet improving this stretch of the river with complete Geomorphic Restoration is essential to the success of any restoration efforts further downstream adjacent to the golf course.

16-12  
cont.



**Eroding Bank at RS 9100**



**Eroding Bank at RS 9300**



**Eroding Bank at RS 10000**

**TRAILS**

**A quote from alt #4:**

The gravel road on the west side of the river is used by the STPUD as a required maintenance road for its subsurface sewer line in that area. No new public trails would be constructed on the east side of the river, and no tie-in would be made with the Sawmill Bike Path. The golf course bridges would remain closed to non-golfing public use.

**14. Please, do not punish recreation users by limiting trail and access improvements with this option. Why are you not including some of the same trail improvements designed to help make alternative #2 so attractive. Do you really only want to include trail improvements if you get alternative #2 approved?**

- a. Add recreational user access across the river: the new bridge described for alternatives #2 and #4 and make the connection to the bike trail via Country Club Drive.
- b. Or, build a bridge connecting Washoe Park to Tahoe Paradise Park, (upstream at about RS 11200), thus connecting two parks. The bridge could be of much lighter construction as it no longer needs to carry golf carts.

16-13

- c. Improve the trails along the river and work to limit duplicate trails serving the same zone.
- d. Add a smooth surface of sand, dirt or chips to the rocky surface of the STPUD access road to make it safe and functional for all recreational users. The materials are already stored nearby in the park.

16-13  
cont.



Let's work Together... Take another sincere look at improving this Alternative: With some or all of the above modifications this alternative can become the win/win/win solution for River restoration, golf course improvements, minimal disturbance of the natural state of Washoe Meadows State Park, and continuation with modest improvements to for all other recreational users of the park.

Thank you for your time and attention to ideas and recommendations.

I will submit further comments on Alternative #2 in another email.

Rick Alexander  
927 Mountain Trout Dr  
S. Lake Tahoe Ca 96150  
alexahoe@sbcglobal.net

- I6-1 The commenter has concerns about trading land between Washoe Meadows SP and Lake Valley SRA. See Master Response Section 3.2, “Land Use,” for a discussion of the settlement agreement that followed the 1984 litigation and of provisions in the California Public Resources Code related to land trades.
- I6-2 The commenter has concerns about wildlife habitat and recreation access related to the proposed golf course reconfiguration. See the following master responses and response to comment:
- ▶ Master Response Section 3.2, “Land Use,” for a discussion on land exchange;
  - ▶ Master Response Section 3.3, “Biological Resources,” for discussions on wildlife habitat;
  - ▶ Master Response Section 3.5, “Recreation,” for a discussion on recreation access; and
  - ▶ response to comment AOB4-5 for a discussion of the proposed location of the reconfigured golf course.
- I6-3 The commenter suggests revising the golf course proposed under Alternative 2 to improve and preserve recreation and scenic resources. As discussed in Chapter 2, “Project Alternatives,” of the draft EIR/EIS/EIS, and in Chapter 2, “Project Description,” of this final EIR/EIS/EIS, the golf course was designed as a link- or target-style course with narrower fairways, minimal traditional turf, and more native areas than the existing golf course. Natural topography will be used to minimize grading for the layout. Tree removal would be minimized, with trees greater than 30 inches in diameter at breast height (dbh) avoided. Mitigation Measure 3.7-2 (Alt. 2), “Prepare and Implement a Landscaping and Forest Management Plan,” would be developed and implemented to maximize visual screening of the golf course, while balancing vegetation management with other resource objectives, including habitat quality and fire fuel management. A buffer landscape would also be managed to maintain a minimum depth of 200 feet between residential properties and the golf course. The forest vegetation in the buffer would be managed to maintain an effective visual screen, appropriate fire fuel control, and wildlife habitat qualities. The plan would be prepared in conjunction with detailed golf course design so that precise areas of disturbance are known and the landscaping and forest management process can be coordinated with golf course construction. The buffer and vegetative screening are not meant to fully block views of all golf course activities, but to help screen views of the course, reduce the visibility of the course to neighbors, and retain the overall forest landscape character outside of the golf course, while allowing proper vegetation management for defensible space.
- I6-4 The commenter states that holes 6 and 14 are incompatible with restoration goals and should be moved. For connectivity and playability of the golf course, holes 6 and 14 need to be placed adjacent to the Upper Truckee River. However, as discussed in Chapter 2,

“Project Alternatives,” of the draft EIR/EIS/EIS, minimally managed landscape (unfertilized native vegetation) buffers have been included as part of the golf course’s design to protect water quality of the Upper Truckee River. Furthermore, as discussed in response to comment AOB8-7, the design under Alternative 2 decreases the amount of golf course adjacent to the Upper Truckee River from 6,382 linear feet under existing conditions to 850 linear feet.

- I6-5 The commenter suggests maintaining a buffer of native vegetation and trail improvements. To protect park resources, holes 7–13 cannot be moved closer together; however, as shown in Chapter 2, “Project Description,” of this final EIR/EIS/EIS, the conceptual golf course design has been modified slightly based on public comments on the draft EIR/EIS/EIS. The trail to the “old barn” is outside of the project area and would not be modified as part of the project. The only changes to the trail would be farther east within the project area to provide connectivity to this existing user-created trail.
- I6-6 The commenter suggests separating cart paths from recreation trails. A separate recreation trail bridge is not proposed as part of this project; however, State Parks could assess the need for an additional bridge as part of future, separate planning efforts. Trails are designed to diverge from the cart path quickly on both sides of the bridge. See Master Response Section 3.5, “Recreation,” for a discussion of trail safety.
- I6-7 The commenter suggests constructing a separate bridge for park recreationists. The request is noted. No additional bridges are proposed for this project. State Parks could assess the need for an additional bridge as part of future, separate planning efforts. See Master Response Section 3.5, “Recreation,” for discussion of trail safety.
- I6-8 The commenter suggests moving the new trail closer to the river and farther from the golf course. The request is noted. Trails were located in their proposed location to minimize impacts on other resources. See Master Response Section 3.5, “Recreation,” for discussion of trail safety.
- I6-9 The commenter requests horseback riding within Washoe Meadows SP. Horseback riding is currently allowed and would continue to be an allowed use within Washoe Meadows SP with implementation of the project.
- I6-10 The commenter has concerns about revenue loss relating to closing the golf course during construction. State Parks plans to allow 9 holes of golf to continue during the entire construction period unless the contractor deems it infeasible, and will keep 18 holes open most years, although they may be shortened or modified temporarily.
- I6-11 The commenter has concerns that the approach to the alternatives analysis was skewed. As discussed in Chapter 1, “Introduction and Statement of Purpose and Need,” and as required by NEPA and TRPA, each alternative (Alternatives 1–5) was considered at an equal level of detail. Where impacts were the same or similar, a reference to a previous impact discussion was used to minimize repetitive language and avoid a lengthier document.
- I6-12 The commenter provides suggestions for improving Alternative 4. The project proponents appreciate suggestions for Alternative 4; however, as discussed in previous studies and in Section 2.2.2, “River Alternatives,” of Chapter 2 of the draft EIR/EIS/EIS, the alternatives were developed by a diverse team of technical experts that included a geomorphologist, hydrologist, engineers, biologist, and other professionals who considered numerous possibilities for potential design opportunities and constraints. Many of the historic meanders mentioned have either been incorporated or considered in the design for

restoration. These other options were eliminated from detailed evaluation for various reasons, such as limited ecosystem benefits, high costs, and environmental risks versus potential benefits.

I6-13

The commenter provides suggestions for improving Alternative 4. The project proponent appreciates trail suggestions for Alternative 4. Although not a part of the proposed Alternative 4, improvements to trail and access roads throughout Washoe Meadows SP are ongoing under existing conditions and would continue under Alternative 4.



Comments to Upper Truckee River Restoration and Golf Course Reconfiguration Project

David and Lori Alessio  
P.O. Box 7304  
South Lake Tahoe, CA 96158

October 23, 2010

We appreciate the opportunity to comment on the EIR/EIS/EIS and we also recognize the tremendous effort by agency personnel in preparing a complex document. In review of the EIR/EIS/EIS, we have the following comments.

**Under section 2.5.2 General Plan Amendment (page 2-56)**, it's acknowledged in the document that there isn't a general plan for Washoe Meadows State Park, yet there is a proposed boundary change for this area under Alternative 2. Utilizing the Lake Valley SRA General Plan amendment process to change boundaries within Washoe Meadows State Park for the sake of implementing Alternative 2, would nullify this alternative as being viable. This appears to be an illegal action by the California State Parks under their own regulations. How can this alternative be legal without a general plan in place for Washoe Meadows State Park when it would remove a large area of land that was purchased with public funds for the intent of preserving the unique characteristics of the property (1984 Litigation Settlement Agreement)?

17-1

**Under section 2.5.3 Project Construction (page 2-65)**, it's stated in the document that construction activities would include street access from Chilcothe Street. Access from Chilcothe Street to Washoe Meadows State Park would take place on a undeveloped sewer maintenance easement, which would have to be upgraded minimally to a native surface road by placing fill in the wetlands and SEZ's. This portion of the easement is on a parcel of National Forest System lands which was purchased under the Santini-Burton Sensitive Land Acquisition Act. Under this federal legislative authority, road construction is prohibited.

17-2

Under the proposed golf course expansion into Washoe Meadows State Park for Alternative 2, the proposed restroom/storage facility is adjacent to the undeveloped sewer maintenance easement. For this facility, it would be unrealistic that routine daily maintenance in the long-term would be accessed

17-3

only by the paved cart path. More than likely, the ongoing servicing of this facility would need to be accessed from the undeveloped sewer maintenance easement, which would also require a new spur from the facility into the the boundaries of Washoe Meadows State Park (reference Alternative 2 map). This would require further evaluation of the effects of the proposed golf course reconfiguration on Washoe Meadows State Park. In addition, any operating plan for the golf course under Alternative 2 must show an access route for commercial use in the state park.

In reviewing the map for Alternative 2, the legend and map is misleading in its representation of pedestrian paths and paved cart paths. The map shows the undeveloped sewer maintenance easement as a pedestrian path when it fact it may be needed for vehicle traffic to service the golf course and restroom facility. The map also shows the scale of the pedestrian path as four times the width of the paved cart paths. This is misleading and may result in misrepresentation of proposed hardened surface areas for coverage in wetlands and SEZ's.

Further, the map for Alternative 2 indicates the proposed Truckee River Bridge as only showing a pedestrian path and a paved cart path. It's likely that this bridge would need to have motor vehicle access.

In summary, the document does not address the complications with Washoe Meadows State Park vehicle access through National Forest System lands and the map for Alternative 2 is incomplete and misrepresents information for an analysis.

17-3  
cont.

### **Section 3.5 Biological Resources (Fisheries and Aquatic Resources, Vegetation, and Wildlife)**

**1. Under Affected Environment, V-2, Uncommon Plant Communities (pages 3.5-6 and 9,** it's addressed in the document protection of sensitive and uncommon plants. The TRPA Code of Ordinance, Chapter 75, calls for the protection of uncommon plant communities. The TRPA threshold applies to but is not limited to those that are listed. The plant, sand lily (*Leucocrinum montanum*), was discovered in Washoe Meadows State Park in 2004 and shown to California State Park and other agency botanist. This population occurs in the study area in and adjacent to the proposed expansion of the golf course under Alternative 2. Any temporary loss of habitat during construction of the golf course under Alternative 2 could lead to permanent loss of habitat for the sand lily. In accordance with TRPA's Initial Environmental Checklist (page 3.5.57),

17-4

significant impact would occur if any alternative would reduce the numbers of any unique, rare, or endangered species. To date there is no other known occurrence of the sand lily in the Lake Tahoe Basin and in El Dorado County, and the species should be considered unique to the area and possibly rare.

17-4  
cont.

There is an active seasonal stream that flows west to east in the study area that intersects with the proposed golf course location around holes 7 and 13. The new course would change the local hydrology and soil moisture within the dry meadow plant community. Therefore, under Impact 3.5-5 (Alt. 2), page 3.5-74, the long-term impact on sensitive habitats for this uncommon plant species would be significant and not beneficial.

17-5

**2, Under Impact 3.5-3 (Alt. 2) pages 3.5-69 to 72,** it's stated in the document that there will be a short-term significant impact disturbance within SEZ and jurisdictional wetlands and by implementation of the three mitigation measures listed, it's claimed that the impacts would be less than significant.

These three mitigation measures are not sufficient in lessening the significant impacts. Mitigation Measure 3.5-3A is a standard permitting requirement to implement the river restoration portion of the proposal and therefore is not a mitigation; vegetation protection measures briefly described in Mitigation Measure 3.5-3B is a design feature that should be inherent to the proposed action for Alternative 2 and therefore is not a mitigation; it's stated under Mitigation Measure 3.5-3C that during construction the spring complexes (including a fen) will be flagged and avoided, however, the document establishes (page 3.5-71) that the likelihood of effects to local hydrology on this resource is significant, and it's presently unknown what the potential magnitude of these effects will be to the local hydrology in the short-term. Therefore, flag and avoiding does not mitigate this significant effect. In summary, these three mitigations do not lessen the short-term significant impacts.

17-6

In addition, construction and buffer zones adjacent to golf course holes 9, 10, and 11 would be within Washoe Meadows State Park and outside of the SRA. The proposed SRA boundary change would not entirely encompass the affected golf course area, therefore resulting in a significant impact to the integrity of Washoe Meadows State Park area. This is not addressed in the document.

17-7

**3. Under Impact 3.5-5 (Alt. 2) pages 3.5-74 to 75,** it's stated in the document that the fen and spring complexes outside of the disturbed quarry area would not be affected by the project. Yet, as addressed above, it's already established in

17-8

the document that there is a significant likelihood of effects to the change in local hydrology and the potential magnitude is unknown to the fen and spring complexes. Therefore, there would be long-term effects. The document fails to address this issue specifically for fens and spring complexes.

17-8  
cont.

**4. Under Impact 3.5-6 (Alt. 2) pages 3.5-75 to 79,** it's stated in the document that the proposed conversion of over 45 acres of forest to a golf-course, the substantial tree removal and loss of the few remaining old-growth trees greater than 30 inches in diameter in the area, would result in a significant impact. The proposed mitigation measure to minimize tree removal and develop an implementation plan does not replace the clear-cutting effect of forest vegetation and change in habitat. Therefore, the proposed mitigation measure does not reduce the impact to less than significant for tree removal and land conversion.

17-9

**5. Under Impact 3.5-7 (Alt. 2) pages 3.5-79 to 80,** the long-term effects from the introduction of over 45 acres of non-native grass species that would be planted in the golf-course, and some can be invasive, is not addressed in the document.

17-10

**6. Under Impact 3.5-9 (Alt. 2) pages 3.5-86 to 88,** the treatment of long-term effects on Special-Status and common wildlife species as a result of habitat fragmentation and elimination of upland forest lands from the proposed golf-course reconfiguration lacks essential information to make a determination of effects.

The document does not state clearly (page 3.5-50) the protocol followed for surveying northern goshawk. The statement, "full protocol surveys were initiated in 2008" does not give the reader complete information as to how many years full protocol surveys were conducted in the study area. Consistency with surveys conducted to protocol is essential in the biological sciences. For example, survey protocol requirements for northern goshawk on the adjacent National Forest System lands is two years minimum for a proposed project. For information, we have personally observed northern goshawks annually within the study area of Washoe Meadows State Park during the past 20 years. In addition, we have observed long-eared owls within the study area of Washoe Meadows State Park during the past 10 years. The list of raptors (Raptor Community, page 3.5-55) is incomplete; in addition to those listed, we have observed in the study area of Washoe Meadows State Park golden eagle, northern harrier, red-shouldered hawk, red-tailed hawk, Cooper's hawk, sharp-shinned hawk, and northern pygmy owl. Therefore, the document does not provide a complete assessment of species diversity.

17-11

The analysis of potential effects to special status and common wildlife species and habitats is on the premise that the upland forested habitat proposed for conversion to a golf course is marginal because of second growth structure, urban interface disturbance, and lack of species occurrence levels (page 3.5-8, Alt. 2 and page 3.5-87). These claims are not based on an objective assessment of the landscape, but rather exhibit an unbalanced focus of proposing a Cadillac River restoration project at the expense of degrading the surrounding matrix of forest habitat.

Within the study area, the upland forest habitat is functioning as a whole ecosystem for its current evolved stage. This should not be interpreted as substandard habitat and unworthy of its continued existence. Given the urban impacts of the land in the Lake Tahoe Basin at the 6,200 foot elevation, this upland forest habitat with the river corridor provide habitat diversity for a variety of species. It's as good as it gets for what we have left in the Lake Tahoe Basin at this elevation. If nests for protected species are not detected at this point in time, it does not preclude that in the future the forest may evolve into having the components necessary for protected species to nest, if left without significant land use changes.

Population viability includes the needs of juveniles to disperse. Although the area may not be suitable for nesting at this time, the dispersal of juveniles and their ability to forage is integral to population viability, and the upland forested habitat provides such habitat. It should be noted that thinning of forests within the study area for defensible space has removed forest thickets which are used for long-eared owls, pine marten, and bears, to name a few species. To further alter the forested habitat by converting to a monoculture of manicured lawns would result in a significant effect.

The claim that adjacent public lands are sufficient to support the needs of wildlife species is inconsistent with the California State Park mission to protect existing wildlife habitat. Implementing the portion of Alternative 2 to convert upland forest habitat into a golf course would perpetuate land practices that have historically degraded the meadow, river, and forest habitats within the SRA and study area. This practice would be inconsistent with the purpose and need of the proposed project to restore ecological processes.

Therefore, the determination that the golf course reconfiguration and trail development would be less significant is inaccurate. The change in habitat would be significant and implementation of Alternative 2 would be inconsistent with the purpose and need of the project by not restoring ecological and

17-11  
cont.

geomorphic processes, and diminishing species diversity locally and regionally. Restoring the river corridor and altering the upland forest habitat as proposed under Alternative 2 is like mending one broken wing and creating a new broken wing. It still can't fly.

17-11  
cont.

**7. Under Impact 3.5-10 (Alt. 2) pages 3.5-88 to 89**, the importance of the wildlife corridor through the upland forest area is dismissed by a statement that it's not expected to function as a significant wildlife corridor. There is no scientific support for this determination that was presented in the document and therefore, it is a subjective assessment. The discussions of a wildlife corridor in the document are mostly focused on the river corridor. A wildlife corridor for this project should include the combination of the study area's river corridor and adjacent forest habitat. It's unquestionable that the entire Washoe Meadows State Park is used by wildlife and hence should be addressed in it's entirety, river and forest area, as a functioning wildlife corridor, regardless of it's rating of some undisclosed scale. Therefore, fragmenting the forest habitat by conversion to a golf-course would have a long-term significant effect.

17-12

These conclude our comments as concerned citizens.

Respectfully,

David Alessio  
Lori Alessio

- I7-1                   The commenters state that a land exchange between Washoe Meadows SP and Lake Valley SRA is illegal. See Master Response Section 3.2, "Land Use," for discussion of the settlement agreement from the 1984 litigation, the 1984 statute, and a general plan amendment.
- I7-2                   The commenters have concerns about access through Chilicothe Street through National Forest System lands purchased with Santini-Burton Sensitive Land Acquisition Act funds. Access through this sewer maintenance easement has historically occurred and is an acknowledged use, and pre-dates USFS acquisition. As necessary, State Parks has improved the roads to provide access through this area. State Parks and STPUD have been coordinating with USFS to obtain a special use permit for access through this parcel. If additional disturbance is necessary to widen the access road for construction purposes, these areas will be restored consistent with current conditions to allow for continued access into the future.
- If Chilicothe Street cannot be used to access the project site, then construction traffic would be diverted to the Sawmill Road entrance. This would add approximately 1,670 inbound and outbound trips for an estimated total of 2,051 trips at Sawmill Road (36% of total project construction trips) under Alternative 2, and less under Alternatives 3, 4, and 5. The Sawmill Road/U.S. Highway 50 (U.S. 50) intersection currently operates at Level of Service (LOS) A overall in the a.m. and p.m. peak hours. LOS at Sawmill Road was not calculated for existing plus project conditions with trips diverted from Chilicothe Street; however, if the LOS were to drop from LOS A overall to LOS E or LOS F overall, the impact would be less than significant. The impact of reduced traffic levels would be less than significant because the impact would be short term and would occur only during construction. Project operations would not affect LOS at the Chilicothe Street/Sawmill Road intersection because the level of use would not change. Any possible construction-related effects on circulation and safety associated with the project would be addressed and mitigated through implementation of the construction traffic management plan described under Mitigation Measure 3.10-3 in Section 3.10, "Transportation, Parking, and Circulation," of the draft EIR/EIS/EIS.
- I7-3                   The commenters have concerns about permanent needs for golf course maintenance access from Chilicothe Street. As discussed in Chapter 2, "Project Alternatives," of the draft EIR/EIS/EIS and in "Chapter 2, "Project Description," of this final EIR/EIS/EIS, the golf course restroom proposed would be accessed only by cart path and would not require access from the property boundary at Chilicothe Street. Also as discussed in Chapter 2, if required, State Parks and/or its golf course concessionaire would prepare an updated operation and maintenance plan in collaboration with the Lahontan RWQCB as part of updated permit requirements. An operation and maintenance plan for Washoe Meadows SP would not be needed, because areas affected would be part of the Lake Valley SRA and included in the plan for the golf course. The existing bridges are currently used for golf course vehicle access when necessary. The proposed bridge under the proposed Preferred Alternative would continue to allow access for State Parks and their concessionaire.

- I7-4 The commenters have concerns about impacts on sand lily habitat. The sand lily, or common starlily (*Leucocrinum montanum*), is a member of the lily family (Liliaceae). It is found in California and in other western states. The sand lily occurs at Washoe Meadows SP in a seasonally wet meadow north of the quarry and south of the STPUD sewer access road. This area is not proposed for habitat alteration under any of the project alternatives. Other locations of this plant have not been positively identified. If this species were to occur in other wet meadow locations, mitigation measures proposed in the draft EIR/EIS/EIS for the protection of sensitive habitats would protect this species. No specific mitigation measures or surveys are required for this species because it has no formal special-status designations by regulatory agencies. *L. montanum* is not recorded for El Dorado County on the CalFlora database Web site as of March 15, 2011. At this time, *L. montanum* does not have any Federal, State, or California Native Plant Society status (CNPS 2011).
- I7-5 The commenters have concerns about impacts on dry meadow plant communities. See Master Response Section 3.3, “Biological Resources.”
- I7-6 The commenters have concerns about impacts on SEZ, fens, and wetlands. See Master Response Section 3.3, “Biological Resources.”
- I7-7 The commenters have concerns about impacts on Washoe Meadows SP relating to the buffer area adjacent to golf course holes 9, 10, and 11. This area would be managed as part of Washoe Meadows SP to protect park resources. Fens are not located within this area. See Master Response Section 3.3, “Biological Resources,” for a discussion of fens.
- I7-8 The commenters have concerns about impacts on fens. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” and Master Response Section 3.3, “Biological Resources,” for discussion of fens.
- I7-9 The commenters have concerns about impacts related to tree removal. The draft EIR/EIS/EIS concludes that tree removal would be a significant impact under Alternative 2 as defined by TRPA regulations. Mitigation Measure 3.5-6 (Alt. 2) would reduce this impact to a less-than-significant level as per TRPA regulations. This measure was developed in accordance with Chapter 71, Section 71.3.B, and Chapters 30 and 77 of the TRPA Code of Ordinances. The mitigation measure requires preparation of a tree removal and management plan and a tree replacement plan by a qualified environmental professional. The significance of this impact with and without mitigation proposed was determined based on the regulatory significance criteria described in the draft EIR/EIS/EIS. Furthermore, the proposed Preferred Alternative will avoid and minimize removal of 30” dbh trees. See Master Response Section 3.1, “Land Use” for a discussion of habitat value.
- I7-10 The commenters have concerns about golf course turf becoming invasive and spreading outside of the managed golf course area. While turf grasses are known to be among the most invasive plant species, in a highly regulated environment such as a golf course, no spread of turf grass into surrounding is expected due to active management including mowing (which would prevent the grass going to seed), and limiting irrigation to the areas where turf grasses are desired for the golf course. Furthermore, native vegetation buffers are included within the golf course footprint to provide additional protection measures.
- I7-11 The commenters have concerns about impacts caused by fragmentation and elimination of upland forest habitat and data used for existing conditions. Raptors such as the Northern Goshawk and Long-eared owl have been documented utilizing the study area for foraging



but are not known to nest within the study area. See Master Response Section 3.3, “Biological Resources,” for a discussion of baseline conditions and wildlife habitat.

I7-12

The commenters have concerns about impacts on the wildlife corridor. See Master Response Section 3.3, “Biological Resources,” for discussion of wildlife habitat.

**Re: Upper Truckee River Restoration and Golf Course Reconfiguration Project**

Richard Anderson [calflyfisher@sbcglobal.net]

**Sent:** Sunday, November 07, 2010 11:36 AM**To:** Project, Upper Truckee

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David, thank you for e-mailing me the joint TU/CalTrout letter. I sent the e-mail below off to Cyndie Walck earlier this morning. Basically, it echoes what you and Jenny had written, although I excluded considerations of economic benefit related to the golf course because they don't relate to the focus of CFF.

-Richard

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**From:** Richard Anderson <calflyfisher@sbcglobal.net>**To:** utproject@parks.ca.gov**Sent:** Sun, November 7, 2010 9:07:34 AM**Subject:** Upper Truckee River Restoration and Golf Course Reconfiguration Project

Attn: Cyndie Walck  
California State Parks and Recreation  
Tahoe City, CA

Dear Ms. Walck:

As the editor and publisher of *California Fly Fisher* magazine, I emphatically support the restoration of riparian and instream habitat along the upper Truckee River within the Lake Valley State Recreation Area. A healthy riparian corridor and river are obviously worthy goals in and of themselves, but these improvements to ecological health will likewise benefit the upper Truckee's sportfishery and the sportfishery of Lake Tahoe, both of which rely in part on robust populations of benthic macroinvertebrates and prey-fish species, and sediment-free trout spawning and rearing habitat that also provides adequate cover from predators.

Accordingly, I would like see California State Parks adopt alternative 2, 3, or 5 for the above-referenced project. Each of these alternatives will significantly benefit the upper Truckee River and its trout through improvements to the streamside environmental zone and through reductions in sediment impacts that currently occur through river bank erosion. Although alternative 4 also provides ecological benefits in relation to alternative 1 (no action), my impression is that these improvements would be substantially less than would occur under the other alternatives.

Thank you for the opportunity to comment on this important project.

Cordially,

Richard Anderson  
Publisher and Editor  
*California Fly Fisher* magazine  
PO Box 8535  
Truckee, CA 96162

18-1

I8-1

The commenter's support for Alternatives 2, 3, and 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

## Truckee River Restoration and Golf Course Reconfiguration

harold anino [haroldanino@sbcglobal.net]

**Sent:** Sunday, September 19, 2010 11:18 AM

**To:** Project, Upper Truckee

19

I would like to voice my support for Alternative 2 of this project. It is the ONLY alternative that actually meets the project's stated objectives of reducing erosion and maintaining recreational and Economic benefit.

While it is important to do what we can to reduce the flow of sediment into Lake Tahoe, it is equally important to do what's best for the residents of South Lake Tahoe and the State of California. The community can ill afford to lose 168 jobs and the \$6 Million in revenue that the golf course generates annually; nor can the State of California afford to lose nearly \$990K in revenue used to support our state parks and recreation areas.

As a resident of South Lake Tahoe, and user of State Parks such as D.L.Bliss and Pope Beach, the revenue generated by the golf course is very important to me.

Lake Tahoe is a worldwide tourist destination based not only on it's natural beauty, but also for it's variety of activities, golf among them. Any reduction in choices available has a negative impact on our economy.

I would like to see Alternative 2 implemented for its positive impact on our environment as well as its economic benefit. With this in mind, I would also suggest that the new holes be built and ready for play, prior to restoration of the existing holes.

Sincerely,

Harold A. Anino  
South Lake Tahoe

19-1

I9-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. State Parks will attempt to have new holes available for play before restoration of existing holes. See Chapter 2, "Project Description," of this final EIR/EIS/EIS for an updated construction schedule.

**Restoration of the Truckee River in Washoe State Park**

Patricia Ardavany [patriciaardavany@yahoo.com]

**Sent:** Monday, September 27, 2010 12:33 PM

**To:** Project, Upper Truckee



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Gentlemen:

I am strictly against relocating any portion of the Lake Tahoe Golf Course into other areas of Washoe State Park. Golf courses are detrimental to the water quality of Lake Tahoe due to the fertilizers that are used to maintain their greens. The \$880,000 that I have read that was paid to the Park System last year for the use of the area that the golf course occupies, is but a drop in the bucket as compared to the cost of the water quality of the Lake and cleaning it up.

110-1

The relocation of some of the holes into other areas of the Park is a violation of the Mission Statement under which the Park was created and is unacceptable. It was to be maintained for the use of future generations.

110-2

Rivers naturally change their courses over time and whose to say where it's natural meanderings would have located it today had it not been changed over a century ago. At this point, digging up its present established location will probable cause more sedimentary runoff into the Lake than than it does now. Golf courses use a lot of water and the grasses grown on them are not indigenous to this area. In addition, wildlife habitat will be destroyed, and the animals living within it will be disrupted and more than likely, disappear.

110-3

110-4

Of the alternatives being considered, the best one is

110-5

complete removal of the Golf Course. There are several golf courses both at South Shore and around the Lake, as well as in the Carson Valley. How many do we really need? The next best alternative is to reduce the Golf Course to a nine hole course and last best, leave everything just as it is and research remedies to reduce the runoff of sediment that runs off into the Lake as a result of the Golf Course being erroneously located where it is in the first place.

I10-5  
cont.

Respectfully,

Patricia Ardavany

- I10-1            The commenter’s opposition to Alternative 2 is noted. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for discussions related to fertilizer use.
- I10-2            The commenter states that Alternative 2 conflicts with State Parks’ mission statement. See Master Response Section 3.2, “Land Use,” for a discussion of consistency with State Parks’ mission statement.
- I10-3            The commenter is correct in noting that rivers naturally change their course over time and that human disturbances make it difficult to reconstruct or predict river migration. However, the draft EIR/EIS/EIS included analysis of historic meander patterns and science-based modeling of the dynamics of the Upper Truckee River channel, performed as part of the technical studies for the Lake Tahoe TMDL. The modeling was validated with historic data and used to simulate future conditions that were presented in the draft EIR/EIS/EIS (pages 3.4-34 to 3.4-36) to represent the anticipated channel status under the No Project/No Action Alternative.
- The commenter is concerned that moving and reconstructing portions of the channel would increase sediment runoff relative to the baseline. However, the results from technical studies for the Lake Tahoe TMDL that were included in the draft EIR/EIS/EIS (pages 3.4-42 to 3.4-43), which used science-based predictions of future erosion of the Upper Truckee River’s stream channel, support the conclusion that Alternative 2, 3, or 5 would result in a substantial long-term reduction in sedimentation. Quantitative and relative comparisons of water quality benefits, in terms of the reduction of pollutant sources from channel erosion and sedimentation, is provided for all alternatives (see Impact 3.4-1 and Table 3.4-11). The draft EIR/EIS/EIS fully considers potential short- and long-term impacts of river channel dynamics on sediment pollution associated with all of the alternatives. Short-term changes in transport of coarse sediment and delivery downstream (Impact 3.4-5) would be mitigated to a less-than significant level by Mitigation Measure 3.4-5 (Alt. 2). Short-term impacts on water quality impacts caused by natural channel adjustments and/or a large flood during the first few years after construction (Impact 3.4-7) would be minimized by Mitigation Measures 3.4-7A and 3.4-7B. However, the strict narrative or numerical water quality standards in the Basin Plan could still be exceeded, at least for short periods of time, and the residual impact would remain significant and unavoidable.
- I10-4            The commenter has concerns about water use and wildlife habitat. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality,” for a discussion of water use; see Master Response Section 3.3, “Biological Resources,” for a discussion of wildlife habitat.
- I10-5            The commenter’s support for Alternative 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Golf Course Project**

patrickatherton@charter.net [patrickatherton@charter.net]

**Sent:** Thursday, October 07, 2010 9:24 AM

**To:** Project, Upper Truckee



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After review of the alternatives for the Lake Tahoe Golf Course I am strongly in favor of alternative#2. I realize there are those who do not care if we provide any amenities to our guests. This narrow-minded view is an attack on those who wish to work, live and enjoy Lake Tahoe. YES to alternative #2.  
Patrick Atherton

| 111-1

I11-1

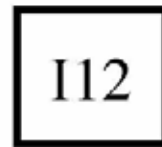
The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**I Support Alternative 2 for the Upper Truckee**

Rob Ayers [kaibacha@gmail.com]

**Sent:** Tuesday, October 19, 2010 2:35 AM

**To:** Project, Upper Truckee



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Moving the golf course and restoring the habitat makes sense.

I 112-1

Rob Ayers

I12-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**From:** Bob Balocchi [rbalocchi@gotsky.com]  
**Sent:** Monday, November 15, 2010 10:06 AM  
**To:** Green, Matt  
**Cc:** Percy Banks; Roy Thomas; Hank Smith; Kent Smith; Arnold, John  
**Subject:** Washoe Meadow State Park - Request for Information

November 15, 2010

Mr. Matt Green,  
 Acting Superintendent  
 Sierra District  
 California State Parks  
 Tahoe City, California

Re: Washoe Meadows State Parks; Proposed Restoration Project; Request for Information

It is my understanding the proposed restoration project, is the expansion of a golf course on state property. It is also my understanding the proposed project s highly controversial among the public.

Please forward the following information and data to me pursuant to section 6250 et seq of the California Public Records Act:

- |  |  |       |
|--|--|-------|
| 1. A copy of the water right petition application for the water rights permit to divert and use more water from the Truckee River that was filed with the State Water Board by State Parks.  |  | 113-1 |
| 2. A copy of the water rights petition order that was approved by the State Water Board to divert and use more water from the Truckee River for the expansion of the golf course by State Parks.   |  |       |
| 3. Copies of the Statement of Divesion and Use filed by State Parks with the State Water Board for the past 10 years for the diversions to the existing golf course. A copy of the written analysis prepared by State Parks that shows the dally, monthly, and annual amount of water to be used for the expansion of the project. |  | 113-2 |
| 4. A copy of the written analysis prepared by State Parks that provide evidence there is sufficient water in the Truckee River to divert more water for the expansion of the golf course during low and critically dry water years.  |  | 113-3 |
| 5. A copy of instreamflow fishery and aquatic study that was conducted for the existing and proposed water diversions from the Truckee River for said golf course during low and critically dry water years. Aquatic means macroinvetrebrate species and their habitat.  |  | 113-4 |
| 6. A statement to determine whether the diversion from the Truckee River for said golf course is screened to prevent adult and juvenile trout from being entrained and harmed.   |  |       |
| 7. Copies of letters of consultation between State Parks and the California Department of Fish and Game, and the US Fish and Wildlife Service regarding their comments concerning threatened and endangered species that may be affected by the proposed expansion of the golf course.   |  | 113-5 |
| 8. A statement that shows that California licensed anglers can access and fish the Truckee River within the high water mark on the state lands through the existing and proposed expansion of the golf course.   |  | 113-6 |

9. A written analysis that shows the Washoe Meadows State Park is in compliance with State of California statutes regarding providing accessibility and accommodations at said state park. Disabled persons do not need to be in wheelchairs to be disabled. I reference Tucker v. California State Parks. | 113-7

10. A copy of the study that shows the effects to Canadian Geese species resulting from the management of the existing golf course and also the management of the proposed expansion of the golf course. i.e. predation of this species by management operations. | 113-8

11. A copy of the budget for the proposed restoration project. |

12. A copy of the budget for the management of the expansion of the golf course which shows state taxpayers are not subsidizing golfers. Include the daily golf rates for the existing and for the expansion of the project, including the cost to reimburse the state taxpayers for said project cost.. | 113-9

13. Forward to me the e-mail addresss of the fisheries biologist and the water rights expert/agent for State Parks that was involved in the proposed restoration project. | 113-10

14. I could not file a copy of the EIS/EIR on the website for the Sierra District. Please forward a copy of the EIS\EIR for my review electrically to me. | 113-11

The California Fisheries and Water Unlimited is a non-profit corporation. We request you waive the cost of forwarding the above information to me. I am requesting the information and data is electronically forwarded to me.

My intension was to file comments with State Parks, but I need the above information before I file comments on the proposed restoration project. I also understand this is the last day for submitting comments to State Parks for said project. Since the State of California is going bankrupt, and there is a significant depression/recession among working and retired people, and also that the proposed project is being funded by the taxpayers., it would be reasonable to allow for an additional 30 days for comments for the proposed expansion of the project. | 113-12

A written response with said information is requested. Thank you.

Sincerely

Signed by Robert J. Baiocchi

Robert J. Baiocchi, President  
California Fisheries and Water Unlimited

cc: Interested Parties (bcc)

- I13-1 The commenter requests information on water right applications and permit approvals for Alternative 2. State Parks will pursue modifications (if needed) to its existing water rights as part of permitting (and final design if necessary based on permitting requirements) after the final EIR/EIS/EIS is certified, because the status of water rights and possible changes are important legal issues, but would not affect the physical environment, because Alternative 2 would not use more water than historical use that was allowed under the existing water right. The irrigation demand is not increased as turf area is actually reduced. Furthermore, if any change to surface water right was needed the deep groundwater well could provide water needs instead of river without creating negative impacts to the river and surrounding habitat. Water rights information is included in Section 3.3, "Hydrology and Flooding," of the draft EIR/EIS/EIS (page 3.3-34). See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality," for discussion of water use.
- I13-2 The commenter requests information on the existing statement of diversion and use. Existing statement of diversion and use information was provided by State Parks. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality," for a discussion of water use under Alternative 2.
- I13-3 The commenter requests a written analysis demonstrating evidence that there is sufficient water in the Upper Truckee River to divert more water during critically low and dry water years. Diversion of more water is not proposed. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality," for a discussion of water use under Alternative 2.
- I13-4 The commenter requests fisheries and aquatic studies and information on macroinvertebrates. A summary of results from the fisheries and aquatic studies, including results of macroinvertebrate studies, is included in Section 3.5, "Biological Resources." In addition, the fisheries report is presented in Appendix G of the draft EIR/EIS/EIS.
- I13-5 The commenter requests consultation letters between State Parks and USFWS and DFG. As discussed in Section 3.5, "Biological Resources," and Chapter 5, "Environmental Laws," of the draft EIR/EIS/EIS, impacts on fish and wildlife would be less than significant, or would be mitigated with measures such as conducting preconstruction surveys to avoid the loss of individuals, nests, or roost sites; developing and implementing a native fish and mussel capture and translocation plan; implementing vegetation protection measures and revegetation of disturbed areas; minimizing tree removal; and developing a tree removal and management plan. USFWS has been sent a copy of the draft EIR/EIS/EIS for review and comment to facilitate consultation on fish and wildlife issues. USFWS has determined that no formal consultation is necessary for the project (Karuzas, pers. comm., 2011).
- As stated in Section 3.5, "Biological Resources," evaluations have been conducted for State-listed endangered and threatened species, and have determined that the project would not likely affect any State-listed species. Therefore, a take permit is not needed for the project. Because surveys have been conducted and effects on listed species would be avoided, the project would comply with the California Endangered Species Act. Section

1602 of the California Fish and Game Code requires that a streambed alteration agreement be granted before any action that may divert or obstruct the natural channel flow; substantially change the bed, channel, or bank of any river, stream, or lake designated by the California Department of Fish and Game (DFG); or use any material from the streambed of a DFG-designated waterway. Implementation of the project would require a streambed alteration agreement from DFG for work on the bed and banks of the Upper Truckee River. State Parks will obtain the streambed alteration agreement from DFG and implement all terms required for permit compliance. Therefore, the project would be in compliance with Section 1602 of the California Fish and Game Code.

- I13-6 The commenter requests a statement that California licensed anglers can access and fish the Upper Truckee River within the high-water mark on the State lands through the existing and proposed golf course. See Master Response Section 3.5, “Recreation,” for a discussion of river access.
- I13-7 The commenter requests information about current and proposed compliance with the American With Disabilities Act. It is State Parks policy to provide accessible environments in which all visitors are given the opportunity to understand, appreciate, and participate in the state’s cultural, historical, and natural heritage. Concessionaires must ensure that the services they offer are accessible to and usable by persons with disabilities; as a general rule, they must perform facility upgrades to meet that mandate. Under new construction under any of the alternatives, renovation or area improvements commencing on State Park property shall be subject to compliance with the requirements of the Americans With Disabilities Act of 1990 (Public Law 101-336; Title 42, Section 12101 et seq. of the U.S. Code [and including Titles I, II, and III of that law]); the Rehabilitation Act of 1973; and all related regulations, guidelines, and amendments to both laws. Such renovation or area improvements must also comply with Section 4450 et seq. of the California Government Code (“Access to Public Buildings by Physically Handicapped Persons”), Government Code Section 7250 et seq. (Facilities for Handicapped Persons), and any other applicable laws. The outcome of all site improvements must include seamless integration of accessible features to the greatest extent possible. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- I13-8 The commenter requests information on Canada geese. See “Impact Analysis for Wildlife and Wildlife Movement Corridors” in Master Response Section 3.3, “Biological Resources,” for a discussion of impacts on common wildlife species.
- I13-9 The commenter requests funding information. See Master Response Section 3.7, “Economics,” for a discussion of funding.
- I13-10 The commenter requests contact information for fisheries and water right experts involved in the analysis of the project. Chapter 6, “List of Preparers,” of the draft EIR/EIS/EIS provided information on parties involved in preparing the draft EIR/EIS/EIS.
- I13-11 The commenter requests a copy of the draft EIR/EIS/EIS, which State Parks provided.
- I13-12 The commenter requests an additional 30 days for comments. The comment period was not extended; however, State Parks stated that comments could still be submitted without a guarantee that they would receive a response. The comment period was extended from 75 days to 85 days, which is twice the statutorily required review period for an EIR under CEQA and 25 days more than required under NEPA.



**LTGC River Restoration Project**

B Barneson [rabarneson@hotmail.com]

**Sent:** Saturday, September 04, 2010 10:37 AM**To:** Project, Upper Truckee

Two summers ago I participated in a season-long survey to get the opinion of occasional and regular visitors to LTGC on the five alternatives proposed for the state-sponsored Upper Truckee River Restoration Project (locals and one-time visitors from afar were excluded). Alternative #5 (course removed) received zero support since LTGC is the only reasonably priced regulation 18-hole golf course at the south shore. Alternative #3 (9-hole course or 18-hole executive course) received virtually no support as being of little interest to golfers (women as well as men). In addition to the loss of an important recreation activity from these two alternatives, the financial impact on the local economy would be devastating and would negatively impact the state's budget as well.

Alternatives #1 (do nothing) and #4 (leave course as is and support river banks) received some support, especially as being preferred over #3 and #5, but with recognition that they would not correct the erosion problem and its adverse impact on the clarity crisis for Lake Tahoe. Further to alternative #4, this approach has been tried for several years at hole #6 without any real success. It only slightly slows the erosion process, but doesn't prevent it. The long-term negative impact would be unchanged.

Alternative #2 (restore the river and retain the course, but move all holes impacting the river away from it) was the clear choice by an overwhelming majority of survey participants, even though they will miss interacting with the river. It was seen as a winning choice all the way around: Lake Tahoe will benefit. Golfers will benefit. Users of the Washoe Meadow area for hiking, biking, fishing, etc. will benefit. The local economy will benefit. And even the state of California will continue to benefit if alternative #2 is implemented.

Bob

I14-1

I14-1

The commenter summarizes participation in a survey of the project alternatives and his opinions of them. The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**proposed destruction of washoe meadows**

fred barry [freddyshred@hotmail.com]

**Sent:** Thursday, November 04, 2010 10:29 AM

**To:** Project, Upper Truckee

I15

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To whom it may concern;

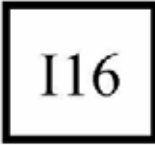
Your proposed Alternative 2 is wrong. How can you even think of moving a golf course into the wild lands when there is a completely viable alternative that is consistent with the planning that State Parks prepared with full public involvement after they obtained the land. The fuel reduction policies that contributed to the destruction from the Angora Fire were shortsighted and ignorant and then we've watched the wholesale destruction of the remaining old growth trees that survived. Now the government wants to destroy are only remaining viable local alternative for secluded hiking and biking and ruin it for a couple months of revenue. This decision is based on greed and not with the principals set forth in good land stewardship. The government seems to be betraying us yet again.

I15-1

Sincerely,  
Fred Barry

I15-1

The commenter's opposition to Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**I Support Alternative 2 for the Upper Truckee**

Andrew Bass [abassak@manatt.com]

**Sent:** Monday, October 18, 2010 4:11 PM

**To:** Project, Upper Truckee

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I am an angler and I enjoy fishing the Truckee River. But I also play golf regularly. With both of these recreational pursuits in mind, I strongly urge that the Department of Parks and Recreation choose Alternative 2 for the Upper Truckee River Restoration & Golf Course Reconfiguration Project.

The continued deterioration of the Upper Truckee cannot continue. Its health is vital to habitat, fish and Lake Tahoe.

By moving part of the golf course away from the river, Alternative 2 will arrest this deterioration. Its a lasting solution that will benefit the river, its fish and fishing, while preserving the 18-hole golf course for all to enjoy. This is truly a win-win-win solution.  
Thank you.

Andrew Bass

116-1

I16-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**washoe meadows/upper truckee restoration**

Jeff Bell [jeffbell60@yahoo.com]

**Sent:** Saturday, September 04, 2010 10:39 PM

**To:** Project, Upper Truckee

I17

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My name is Jeff Bell and as a life-long Californian with roots in the Lake Tahoe area, I find it disgusting that your department and the TRPA would favor Alternative #2 of the "Upper Truckee River Restoration and Golf Course Reconfiguration Project" environmental report. We appoint and elect stewards of the public domain to bring long term solutions to situations such as the one in the Upper-Truckee Basin. We expect you and your agency to make the right decisions when it comes to protecting Lake Tahoe for future generations of Californians to enjoy. If the decision that you make as public servants is based upon the needs of a special interest, know now that such a short-sighted decision will be eventually reversed and made right by the people of California that truly care about our Lake. I merely ask you to do the right thing and help restore The Upper Truckee Watershed in a way that you can say was the right thing to do for Lake Tahoe and the people of California. Sincerely, Jeff Bell

I17-1

I17-1

The commenter's opposition to Alternative 2 and support for the restoration for the Upper Truckee River watershed is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



November 1, 2010

To whom it may concern,

We have lived adjacent to Washoe Meadows State Park for over 20 years, and have been tremendously blessed by the recreation, beauty, wildlife and quiet that the park affords. The debate swirling around the Upper Truckee River Restoration and Golf Course Reconfiguration Project is not a debate over river restoration. All participants support this end, as we do. However, the involved agencies are showing an undo bias toward Alternative 2, advocating golf course expansion. They appear ready to do this by ignoring preeminent laws protecting sensitive land, historical and cultural sites, diminishing animal and plant habitat, and quiet and peaceful local neighborhoods.

Aside from the obvious indifference to their own environmental standards, misleading the public about their intentions, and ignoring input from their own constituents, this is being pushed at a time of decreasing popularity in golf. The Environmental Impact Report or EIR clearly details the declining revenues of the current State Recreation Area's activities. And unless Global Warming overwhelms us sooner than expected, Tahoe's fragile golf season is not going to get any longer. The trend in Tahoe is definitely toward less expensive activities that everyone can participate in, exactly the activities this precious piece of land affords.

The land in question was purchased by the state in 1984. The 1984 California Legislative Statute appealed for the purchase using taxpayer dollars. They called it an act of urgency; "in order to acquire as state lands an environmentally sensitive parcel of approximately 777 acres of land comprising wetlands, meadows, and wildlife habitat for the purpose of protecting a unique and irreplaceable watershed". The parcel contained an existing golf course to the East, and a fragile and diverse piece of land to the West. Separating them was the main tributary of Lake Tahoe, the Upper Truckee River. The side containing the golf course was designated a State Recreational Area, and the land across the river, bordering numerous neighborhoods along North Upper Truckee, was designated as a state park, originally named Washoe Meadows Wildlife Refuge. In our opinion, nothing has changed to alter either these designations or the reasons behind them.

According to the States' own Unit Purpose Statement adopted in 2000 "the purpose of the Washoe Meadows State Park is to preserve and protect a wet meadow area associated with Angora Creek and the Upper Truckee River at the southwest side of the Tahoe Basin. The unit's associated forest sustains Jeffrey... and Lodgepole pine. The unit contains 14 Native American occupancy sites and remnants of a historic dairy, and is contiguous to other public lands important for their open space values and recreational uses." Consider that this statement came before the Angora fire. It should be apparent how much more important these forests and wetland areas become as a habitat for indigenous wildlife and plants.

How can a golf course (on which there has already been 1 diesel spill-related incident) not damage the land? How can State Parks, who claim to be essentially bankrupt (we just happened to have returned from voting, and there was a Proposition that said we need to tax all drivers \$18 in order to keep the parks afloat), afford to hire an outside PR firm to push Alternative 2? We're convinced that if the golf course was only 9 holes, or reconfigured to become an executive-type course, the golfers would still use it, regardless of what they might be saying currently.

What these agencies must remember is that the land in question is theirs to protect, not abuse. While they have been designated guardians of this sensitive and precious parcel of PUBLIC land, it is not theirs. The land belongs to all of us!

Respectfully,

Stew and Hillary Bittman  
PO Box 8956 (1721 Delaware St)  
South Lake Tahoe, CA 96158

118-1

118-2

- I18-1                    The commenters' opposition to Alternative 2 is noted. The commenters have concerns about consistency with 1984 California legislative statute and declining revenue, and impacts on wetlands, meadows, and wildlife habitat. See Master Response Section 3.2, "Land Use," for a discussion of the 1984 settlement agreement; see Master Response Section 3.3, "Biological Resources," for a discussion of impacts on wetlands and habitat. Appendix E, "Lake Tahoe Golf Course Economic Feasibility Analysis," to the draft EIR/EIS/EIS acknowledges that the Lake Tahoe Golf Course has experienced declining gross revenues since 1997.
- I18-2                    The commenters have concerns about impacts of Alternative 2 on wetlands, meadows, and wildlife habitat. See Master Response Section 3.3, "Biological Resources," for discussion of impacts on wetlands and wildlife habitat.

**help us play golf**

STEPHEN BLONSKI [yesblonski@sbcglobal.net]

**Sent:** Tuesday, October 12, 2010 11:14 PM

**To:** Project, Upper Truckee

119

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closing the golf course is a bad thing. it brings together the community, generates a ton of monie for the state parks. last time the golf course made major changes price changes ect. a lot of people moved from Tahoe to play more affordable golf. the inpaced on local bussniss would suffer also a lot of people come here to play, its the only regulation golf cours in south lake. the exeptin is edgwood can you afford \$300 to play a round, and would creat a monopoly!. why give Nevada all of california's revenue. let the public play its our right also. thank you stephen blonski. PS. resident since 1974. registerd voter same! this is not one change lake tahoe can afford or take

119-1

I19-1

The commenter's support for keeping an affordable golf course open is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



jbolce@winfirst.com [jbolce@winfirst.com]

Sent: Sunday, November 07, 2010 5:18 PM

To: Project, Upper Truckee

Dear Cyndie Walck,

No surprise, I am a neighbor of Washoe Meadows State Park. In fact my husband and I purchased our home by the park after walking through the meadow and enjoying the river with our daughters. Our home in Tahoe is where we hope to retire and enjoy similar walks with our future grandchildren. We bought by a state park mistakenly believing the land would be protected for future generations. A golf course was/is not our vision of protecting park land for future generations to enjoy.

The following reasons for not pursuing Alternative 2 are serious concerns that will effect more than neighbors of the park;  
Fragmentation of the Washoe Meadows State Park  
Disruption of wildlife corridors  
Damage to unique fen/wetland area  
Alignment of the golf course along an increased segment of the river  
Disturbing and / or covering over pre-historic cultural sites  
Transformation of wildlife habitat to a heavily managed golf course with non-native greens, paved paths, pesticide, herbicide and fertilizer use.  
Potential increase in the total area and length of golf course fairways at the expense of the Park.

120-1

Why remove the golf course from proximity to spawning streams? Newly hatched baby trout are as delicate as snowflakes. Very slight amounts of chemicals in the water kill them, no matter how "environmentally sound" the promised golf maintenance practices are. Toxic herbicides, fertilizers and pesticides will find their way into streams through runoff or groundwater collection.

120-2

Questions abound about the source of the water to keep the course green. California's antiquated water laws are a problem, and the parks agency evades questions about the potential of lower stream levels and temperature increases due to the expansion of wells for the reconfigured course. These actions are illegal in Nevada.

120-3

The restoration of the stream and its banks and meadows to improve trout spawning for the lake would not require land purchase. It is already state land.

120-4

We strongly support of Alternative 3 River Ecosystem Restoration with Reduced-Play Golf Course. Alternative 3 provides the best opportunity to restore the Upper Truckee River, while simultaneously conserving valuable forested and sensitive land.

120-5

We strongly support Alternative 3 for those that live near the park now and for future generations who will one day enjoy it and South Lake Tahoe.

Thank you for your attention to our concerns.  
Sincerely,  
Debbie and John Bolce

- I20-1            The commenters' opposition to Alternative 2 is noted. The commenters have concerns about impacts on cultural resources; impacts on wildlife corridors, fens, and wetlands; alignment of the golf course along an increased segment adjacent to the Upper Truckee River; use of pesticides, fertilizer, and herbicides; and invasive species. See the following master responses and response to comment:
- ▶ Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality," for a discussion of water quality, golf course operations, and fens;
  - ▶ Master Response Section 3.3, "Biological Resources," for a discussion of fens, wetlands and the wildlife corridor;
  - ▶ Master Response Section 3.6, "Cultural Resources," for a discussion of protection of and access to cultural resources;
  - ▶ response to comment I6-3 for a discussion of existing and proposed golf course adjacent to the river; and
  - ▶ Chapter 5, "Corrections and Revisions to the Draft EIR/EIS/EIS for text revisions related to these topics.
- I20-2            The commenters have concerns about water quality impacts from golf course operations and implementation of Alternative 2 on trout species. In-channel construction associated with Alternative 2 would result in short-term habitat degradation, but mitigation Measures 3.5-1A through 3.5-1H were developed to limit short-term impacts on fish and other aquatic species. The long-term impact on habitat for fish and other aquatic species would be beneficial because the project would restore approximately 97 acres of floodplain and meadow, including 37 acres of SEZ. The increased area and improved ecosystem functions of SEZ, floodplain, and riparian communities would be beneficial because they would result in a long-term net increase in instream cover, shade, and recruitment of woody debris. In addition, the golf course would be removed from most areas adjacent to the Upper Truckee River channel, and adjoining riparian vegetation communities would be restored. This would provide a greater buffer between the golf course and aquatic habitats and would prevent the aquatic ecosystem from being adversely affected by golf course operation.
- I20-3            The commenters have concerns about impacts on the stream level and temperature from water use for golf course operations. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality," for a discussion of water availability and effects on the Upper Truckee River. The commenters are concerned about California water laws and notes that such laws differ from those of Nevada. The project is under the jurisdiction of the State of California, and State Parks intends to comply with all relevant regulations. The State of Nevada's water laws do not apply to the project area.
- I20-4            The commenters state that stream restoration does not require land purchase. For clarification: State Parks does not propose to purchase any property as part of this project.

I20-5

The commenters' support for Alternative 3 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Golf Course**

Laurelle Brazil [laurelle27@sbcglobal.net]

**Sent:** Thursday, September 30, 2010 3:45 PM

**To:** Project, Upper Truckee

Living in Lake Tahoe for 26+ years and having visited since childhood I feel that the best alternative to the UTR Project would be the proposed alternative #2 in which the existing course be re-figured to accomodate the UTR and yet keep one of the CSP's revenue generating parks to exist and co-exist with proposals for Washoe Meadows. Not only are there direct jobs involved but indirectly this course affects quite a number of people---importantly the children of SLT. This course is the only one available to our youth and their Home Course for our local high school. As we continue to promote healthy lifestyles and support for our youth sports ,this is a must to keep this course in existence. Another MAJOR factor is that millions are generated in supplementary income to our surrounding community from the visitors who play and stay locally. I come from an environmental background having worked for the Calif State Parks for several years, so my personal bent and professional one combine to make the ONLY balanced decision that would be a win/win for the public.

I21-1

Laurie Brazil

530-409-2791

"I am the master of my fate; I am the captain of my soul" Nelson  
Mandella



Letter  
I21  
Response

Laurelle Brazil  
September 30, 2010

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I21-1

The commenter's support for Alternative 2 and the need to keep the existing revenue and jobs is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Cabin Owner and I Support Alternative 2 for the Upper Truckee**

Mike Brink [luv2whl@comcast.net]

**Sent:** Sunday, October 24, 2010 10:02 AM

**To:** Project, Upper Truckee



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My family has owned a cabin on the Upper Truckee in Xmas Valley for 90 years and we avidly fish the river. I am also a registered engineer and used to work as an environmental consultant so know the issues. I strongly urge that the Department of Parks and Recreation choose Alternative 2 for the Upper Truckee River Restoration & Golf Course Reconfiguration Project.

I22-1

The continued deterioration of the Upper Truckee cannot continue. Its health is vital to habitat, fish and Lake Tahoe.

Mike Brink  
2362 Rainbow Road  
Meyers

Mike Brink

Letter  
I22  
Response

Mike Brink  
October 24, 2010

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I22-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Sherie Brubaker**

Home (530) 577-6557  
Cel (916) 217-6557

PO Box 551125  
South Lake Tahoe, CA 96155



Do not send mail to Home: 1843 Toppwetah St, So Lake Tahoe, CA

Email [utproject@parks.ca.gov](mailto:utproject@parks.ca.gov)

Cyndie Walck  
CA State Parks and Rec, Sierra District  
PO Box 16,  
Tahoe City, CA 96145

9-20-2010

Subject: River-Golf Course EIR/EIS/EIS

I am opposed to Alternative Two which will restore the river AND move 8-9 holes of the Lake Tahoe Golf Course into Washoe Meadows State Park, nearly doubling the number of golf fairways bordering the river.

I am in favor of restoring the river AND save the park from golf course development

Points

- 1. It is inappropriate to move a golf course onto environmentally sensitive land within a State Park. | 123-1
- 2. I love the open space of the State Park.
- 3. This will break up the park and destroy wildlife habitat. We have few animals now in our neighborhood. Please let our children and adults enjoy the wildlife.
- 4. Alternative 2 will nearly double the number of golf course fairways bordering the river. We want an open natural space near the river. | 123-2
- 5. Alt 2 will transform present habitat for diverse wildlife into a monoculture. | 123-3
- 6. The sport of Golf is declining. Most people prefer to golf near the lake, not in Meyers. | 123-4
- 7. In it's present state, Washoe Meadows State Park provides year-round, low-impact, affordable recreation. | 123-5

Thank you

*Sherie Brubaker*

- I23-1            The commenter’s opposition to Alternative 2 and support for the restoration for the Upper Truckee River watershed is noted. See Master Response Section 3.3, “Biological Resources,” for a discussion of impacts on fens and wildlife habitat.
- I23-2            The commenter states that Alternative 2 would double the number of golf course fairways bordering the river. For clarification, see response to comment AOB8-7, which discusses the location of the golf course in areas adjacent to the Upper Truckee River under current conditions and Alternative 2.
- I23-3            The commenter has concerns about habitat turning to monoculture. See Master Response Section 3.3, “Biological Resources,” for a discussion of wildlife habitat and baseline conditions.
- I23-4            The commenter states that golf is declining and that people prefer golfing near the lake and not in Meyers. The comment is noted. Appendix E, “Lake Tahoe Golf Course Economic Feasibility Analysis,” to the draft EIR/EIS/EIS acknowledges that the Lake Tahoe Golf Course has experienced declining gross revenues since 1997. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- I23-5            The commenter states that Washoe Meadows SP provides year-round, low-impact, affordable recreation. The comment is noted. Washoe Meadows SP would continue to provide year-round, low-impact, affordable recreation under all alternatives. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Upper Truckee River Restoration Project & Golf Course Reconfiguration Project**



Dave Burba [service@burba.us]

**Sent:** Friday, November 05, 2010 8:28 PM

**To:** Project, Upper Truckee

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With regards to the Upper Truckee River Restoration Project & Golf Course Reconfiguration Project.

I have read the summaries of the project and walked the areas. I support Alternative 2.

The project can be a win-win for both the river and its environment, and for restoring the damaged area where Amacker Ranch used to be.

Alternative 2 moves the golf course onto damaged land where Amacker Ranch used to be, improving those areas and reducing the environmental imprint of the golf course.

I believe that modern golf courses can be a benefit to the environment and wildlife. I believe that the golf course is important to our recreation-based economy. That is why I support Alternative 2.

David Burba  
1188 Lindberg Ave  
South Lake Tahoe, CA

I24-1

I24-1

The commenter's support for Alternative 2 and its environmental, economic, and wildlife value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Upper Truckee River Project**

Royal Bush [royal@royalsystemsgroup.com]

**Sent:** Tuesday, September 21, 2010 3:23 PM**To:** Project, Upper Truckee**Cc:** kathystrain1@gmail.com

I am a golfer and a resident of Lake Tahoe and I believe the California State Parks should adopt Alternative 2 as outlined in the draft EIS/EIR/EIR document because it is good for the river, the local community and yes, golfing as well.

The reasons why Alternative 2 is the best alternative:

- 1) It restores the Upper Truckee River, enhances the surrounding wetlands and animal habitat and reduces silt flowing into Lake Tahoe.
- 2) It keeps our 18-hole golf course open by moving 9 holes to a currently available area outside the river flood plain.
- 3) This alternative would keep the only affordable, regulation size, 18-hole golf course in Lake Tahoe.
- 4) The proposed new area (outside the flood plain) for the new 9 holes is currently a blighted area anyway and putting 9 holes over there is a major visual improvement.
- 5) Reducing our golf course to 9 holes or removing the course entirely will deprive us of a major recreation opportunity currently provided by our California State Parks. This is extremely biased against the many local golfers that live in the South Tahoe area.
- 6) Visiting golfers and tournaments will not come to a golf destination vacation area for a 9-hole golf course.
- 7) The local golf course is critical to our local economy. The impact to our already fragile local economy would be negatively impacted by as much as \$6 million dollars each year if the golf course were removed.

We need to vote for Alternative 2. It is good for our community, our golfing and the river.

Thank you,

1738 Eire Circle

South Lake Tahoe, CA 96150

Royal Bush  
Royal Systems Group  
www.royalsystemsgroup.com

125-1



I25-1

The commenter's support for Alternative 2 and its benefits to the river, wildlife habitat, water quality, and the economy are noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

To whom it may concern ((Public comment on Lake Tahoe Golf Course):

Having just read the article, "Public Comment on Golf Course Opens" by Adam Jensen, in the Tahoe Daily Tribune, dated August 27, 2010, I have the following comments:

1. Of the five alternatives, only alternatives 2, 3, and 4 address the goals of the project; namely "...`reduce erosion that is harming Lake Tahoe`s clarity.....and ...while maintaining the recreational and economic benefits of the area."
2. Alternative #1 should not be considered because it does not address the "bank erosion in the reaches adjacent to the golf course...." as noted by the National Sedimentation Laboratory report.
3. Alternative #5 should not be considered because the elimination of the golf course will obviously impact the economic benefits of the area.
4. Alternatives 2, 3, and 4, will all require stabilization of the Upper Truckee River so why even consider Alternative 2 as it would require altering other environmentally sensitive areas.
5. Of the two remaining alternatives (3 and 4), I favor Alternative 4, except for the notion that there would be no change to recreation access and all bridges would remain closed to non-golf use. I think that as a part of Alternative 4 all recreation access and bridge use should be examined and on the table. For example, in the photo of Cindy Walck there is mention of an undersized bridge that has caused increased water velocity and high erosion rates.....this bridge should be redesigned and rebuilt, as should all of the bridges on the golf course. Most are narrow and dangerous on a frosty morning, but most do not contribute to erosion. Greater utilization of the trails within the golf course for bikers and hikers during the summer should also be a part of Alternative 4!

In conclusion, as a golfer and environmentalist I strongly support the retention of the existing 18-hole golf course with minor changes; I strongly support the stabilization of the river, including redesign of bridges which may contribute to high stream flow; and I strongly recommend that, as a part of Alternative four, you consider expanding recreational access and bridge use (I don't believe it is recreation users that are causing the erosion).

Dave Carneggie  
530-577-7762  
2892 St. Nick Way  
South Lake Tahoe, CA.  
96150

I26-1

I26-1

The commenter states opinions after reading an article in the *Tahoe Tribune* and shows support for Alternative 4. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. For clarification, only Alternative 4 requires stabilization, not Alternatives 2 and 3, which take a geomorphic approach. The commenter suggests allowing bridge access to trail users under Alternative 4. As described in Section 3.7, "Recreation," of the draft EIR/EIS/EIS, under Alternative 4 the bridges would remain closed to recreationists other than golfers because the design of the existing golf course poses continued safety concerns should nongolf recreationists be within the line of play (e.g., if a golfer shoots a ball across the river). This does not limit the option for State Parks to install a separate trail bridge outside of the golf course as part of future planning efforts.

**TRUCKEE RIVER PROJECT**

carson@carolcarson.com [carson@carolcarson.com]

**Sent:** Saturday, September 11, 2010 12:33 PM

**To:** Project, Upper Truckee



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Please eliminate the golf course which has caused erosion and pollution to the river. Golf is a waining sport and moving the course to another location is not worthy of our tax dollars.

| 127-1

Thank you,  
Carol Carson

"May your trails be crooked, winding, lonesome, dangerous, leading to the most amazing view. May your mountains rise into and above the clouds. May your rivers flow without end...down into a desert of red rock...where something strange and more beautiful and more full of wonder than your deepest dreams waits for you ---."

~Edward Abbey

I27-1

The commenter's support for eliminating the golf course (Alternative 5) is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**washoe meadows**

greg case [gregjcase@yahoo.com]

**Sent:** Tuesday, August 31, 2010 5:44 PM

**To:** Project, Upper Truckee

I28

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I strongly object to moving any of the golf course into Washoe meadows as it now is. Keep the golf course east of the river and remove any impacting bridges, fairways etc completely. In fact get rid of the golf course completely. It does not have a right to exist at the expense of the state park and the quality of the river, lake etc.,

I28-1

*Be light of spirit and strong of heart.*

I28-1

The commenter's support for Alternative 3 or 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Washoe meadows EIR**

greg case [gregjcase@yahoo.com]

**Sent:** Monday, September 20, 2010 4:10 PM

**To:** Project, Upper Truckee

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I strongly oppose option 2. What a waste of time and money to move 9 holes, or any holes of golf into a state park. This is the most destructive and most costly, so the worst option that you propose. We can keep the golf course if we must, and even all 18 holes, by simply restoring the river within the existing course, moving fairways, etc, several feet away from the edge of the river. This will shrink them some, or narrow them some, but will not eliminate them, and this will cost the least, and be the least disruptive to both the park and the golf course. Please do not waste my money, or destroy my park for this restoration, that really does not need to be done in the first place, or at least, if you just have to spend millions of dollars, can be done in place, leaving the park and the golf course where it is. thank you Greg case

I29-1

*Be light of spirit and strong of heart.*



I29-1

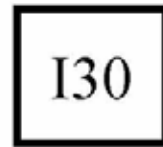
The commenter's opposition to Alternative 2 and support for restoring the Upper Truckee River watershed is noted. The commenter suggests modifying the existing footprint of the golf course and keeping 18 holes. See response to comment AOB8-1 for a discussion of alternatives considered but eliminated from further evaluation.

**Lake Tahoe Golf Course**

John Castellanos [castellanos-law@sbcglobal.net]

**Sent:** Tuesday, October 12, 2010 7:01 PM

**To:** Project, Upper Truckee



---

This is to advise that I am in favor of maintaining LT golf course and proposed changes to the course. The course in my opinion is a necessary and affordable venue for outdoor recreation in the area. John Castellanos, 530-544-1752

I30-1

I30-1

The commenter's support for Alternative 2 and maintaining an affordable golf course is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Comments on draft UTR EIR/EIS**

Amy Cecchetti [acecchetti@tahoe.ca.gov]

**Sent:** Monday, November 01, 2010 12:11 PM**To:** Project, Upper Truckee**Attachments:** UTR EIREIS Alt 2 map.pdf (259 KB)

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Good afternoon Cyndie,

Thank you for the opportunity to comment on the draft EIR/EIS for the Upper Truckee River Restoration & Golf Course Reconfiguration Project. I live in the area and would like to provide some comments, as a citizen. The Washoe Meadows State Park, Lake Baron, and Golf Course (in the off season) are all within an easy distance from my house. I enjoy these areas year-round via walking, mountain biking, cross-country skiing, and snowshoeing.

I would like to support Alternative 2 of the draft EIR/EIS for the Upper Truckee River Restoration & Golf Course Reconfiguration Project for the following reasons. Some questions are included:

1. Although I don't agree with cutting down so many trees to install a new golf course, this alternative will provide restoration for a majority of the River, while still allowing the golf course to function at full capacity in order to provide the State Park with necessary funds.
2. Is there a plan to save the unique &/or large trees in the areas of planned greens & fairways? (I could have missed this section. It is quite a large document.)
3. I believe the proposed pond, bridge, and greens will be an improvement to the remaining un-restored portion of the borrow pit. This will provide much needed soil stabilization. The silt fence around the sand pile has been ineffective for some time, not to mention the large area of surrounding disturbed soil is continually open to further erosion.
4. I am pleased to see that a restroom will be installed on this side of the golf course. A round of playing golf can take a long time & I believe this will provide a sanitary solution, especially since the river is so close-by.
5. I am pleased to see that this alternative will add nearly 2000' of length to the river, thus reducing velocity, & increasing meandering to mimic its more historic and natural river form. I often walk the Truckee River area during large storms. The river is often brown due to large sediment load, high stream velocity, and inability to overtop its banks due to incising. High flows have continued to erode the banks to the point that portions of the trail along the river (upstream from the Country Club Dr. / hole 6 bridge) have been taken out by the river itself.
6. I am glad to see that all the bridges will be removed except one, which will be made much longer in order to cross the river. This will assist in the ability to fully restore the river and allow it to naturally flood.
7. I am pleased to learn that the unnamed creek that crosses under Country Club Drive & runs through the golf course will receive some improvements. This creek's inception near Pioneer Trail is larger than its outfall to the Upper Truckee River, the reverse of which should be true. As a result, the creek has been confined to a ditch, providing little treatment in its middle section through the subdivision, upstream of the golf course.
8. Alternative 2 provides a bridge leading from the eastern portion of the golf course to the proposed western portion. I read the section pertaining to the paved ADA access for this public/golf bridge & associated trail. I did not see how a portion of the trail will deal with 2 wet areas. There are 2 seasonal springs west of the bridge that will need some form of boardwalk or bridge. These areas are often flooded in the early season. The first area is SE of the north end of #7's fairway, (just south of the trail

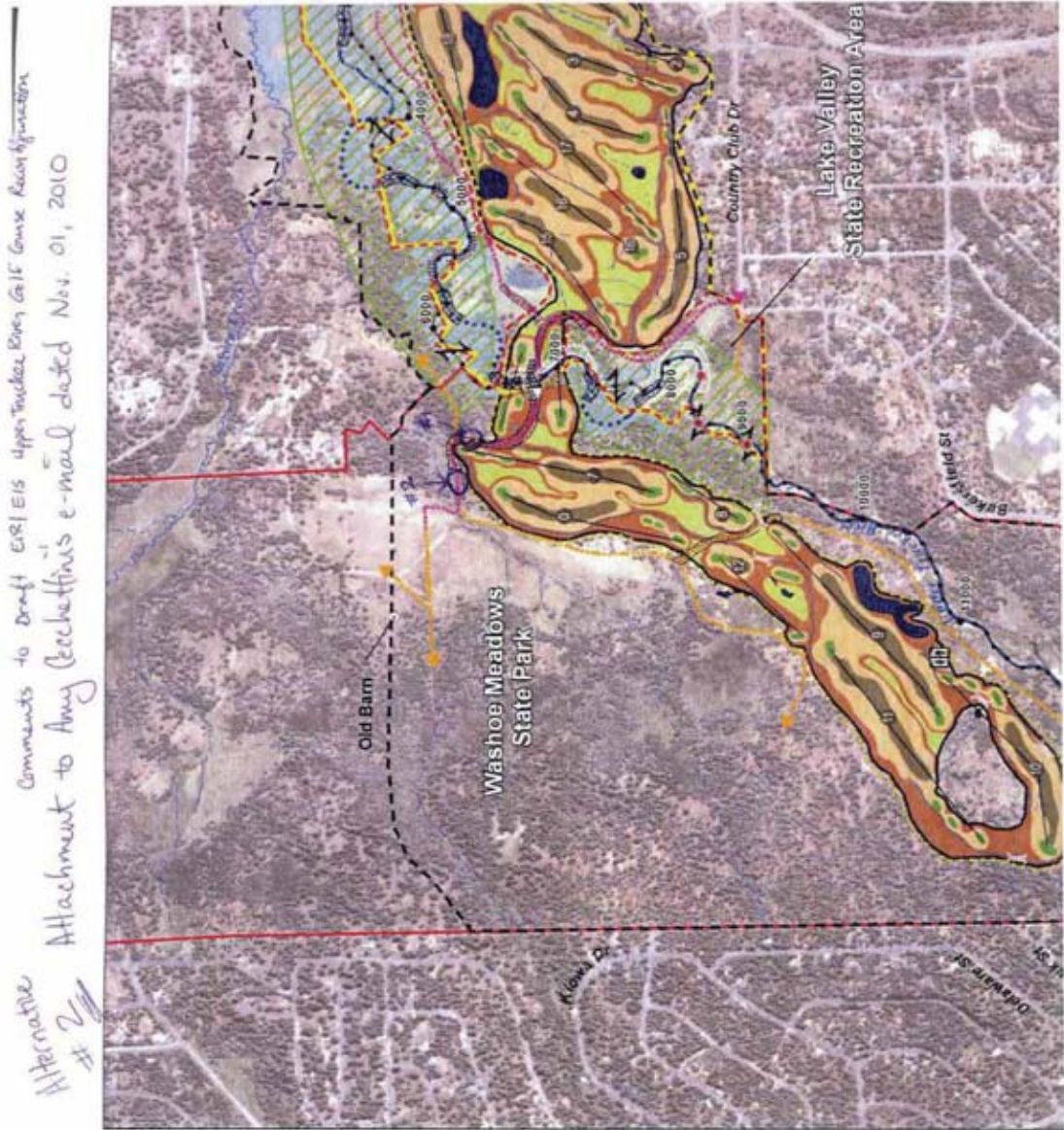
I31-1

bend from an N-S to E-W orientation), near a manhole. The second area is west of the same bend @ the north end of fairway #7 in the existing forest, and east of the fallen large tree located at the intersection with the road through the open meadow leading to the barn. Please see attached map. I can show you in person if I am not describing this very well.

131-1  
cont.

Thank you for the opportunity to comment,

Amy Cecchetti  
P. O. Box 7895  
South Lake Tahoe, CA 96158  
(1815 Bakersfield St.)  
(530) 577-5170 (home-msg)



I31-1

The commenter's support for Alternative 2 is noted. The commenter does have concerns and questions about tree removal. See Master Response Section 3.3, "Biological Resources," for a discussion of tree removal. See Impact 3.5-6 (Alt. 2) for a detailed discussion of tree removal under Alternative 2. As discussed in Impact 3.5-6 (Alt. 2):

Under Alternative 2, an estimated total of 1,640 trees greater than 10 inches dbh would be removed, including 1,395 trees for golf course relocation, 120 trees for geomorphic restoration, and 125 trees for access road construction. This estimate includes three trees greater than 30 inches dbh, with at least one tree greater than 30 inches dbh within the proposed golf course footprint and two trees greater than 30 inches dbh that would be removed for geomorphic restoration. However, trees to be removed under Alternative 2 will not affect an old growth forest.

Trees greater than 30 inches dbh have been avoided by project design except where infeasible, as described.

**Upper Truckee restoration and Lake Tahoe Golf Course**

Carol [carol@ltva.org]

**Sent:** Monday, October 04, 2010 3:15 PM**To:** Project, Upper Truckee

As a 30 year community member, I feel that the Lake Tahoe Golf course has a place in our economy and place for residents and visitors alike. Alternative 2 makes the most sense from every direction. I am quite surprised that others believe that restoring the entire piece of property to a park is best way to go. This has been a golf course for a long time and it should be improved in order as an amenity for visitors and locals who are searching for a quality golf experience. Today, the golf course is not competitive. Alternative 2 gives us the opportunity to elevate LTGC and make it better, make it more of a 2nd tier course that can compete with those courses in the valley and in Reno. And of course it gives us the significant stream restoration which is so needed.

If you were to completely remove the golf course, CA State parks would have no funds (at least not in the foreseeable future) to do much to improve the area. Public access would thus be limited, not enhanced, and this would not be serving the people. In fact, it would be a huge loss to people in terms of jobs, tourism and recreation. Additionally, removing the golf course (Alt 5) would impact much needed CA State parks revenue. The golf course currently contributes almost \$900,00 per year to CA Parks and with current funding shortfalls, CA Parks would lose a significant source of money. CA Parks' mission is to provide recreation as well as preserve the environment, and preserving the golf course in an 18 hole configuration aligns with that mission.

Finally, a last consideration for Alternative 2 is that the neighboring community will most likely see an uptick in real estate values due to the improved golf course and greater access and number of trails without encroaching on privacy.

I strongly urge you to support Alternative 2 -- for our community, economy and environment.

Carol Chaplin

I32-1

I32-1

The commenter's support for Alternative 2, including golf course improvements and economic benefits, is noted. The commenter believes that Alternative 2 will improve the real estate values of the neighboring community. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



## Upper Truckee Restoration Project

Barb Childs [barbara.childs@charter.net]

**Sent:** Friday, October 29, 2010 6:59 AM

**To:** Project, Upper Truckee

I33

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Please consider alternative 2 or 4 as the best choices to ensure the environment and our economy.

| I33-1

Barbara Childs, Realtor, MBA  
Pinnacle Real Estate Group of Lake Tahoe  
3045 Harrison Avenue  
South Lake Tahoe, CA 96150  
530-541-0945 primary office  
530-543-6676 secondary office  
888-719-5048 toll free  
530-452-1812 efax  
[bc@barbarachilds.com](mailto:bc@barbarachilds.com)  
[www.barbarachilds.com](http://www.barbarachilds.com)  
South Tahoe Association of Realtors (STAR):  
2009 Realtor of the Year  
2010 Immediate Past President  
American Association of University Woman (AAUW):  
2010-2011 President, South Lake Tahoe Branch  
CA DRE# 01306126

Letter  
I33  
Response

Barbara Childs  
October 29, 2010

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I33-1

The commenter's support for Alternatives 2 and 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Restore Tahoe Fishery**

J.P. Christensen [ccnjcnv7@yahoo.com]

**Sent:** Thursday, November 04, 2010 11:51 AM

**To:** Project, Upper Truckee

I34

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My son is an avid golfer...however, even he agrees that restoration of a magnificent eco-system is more important! Please, lets help bring back a fisheries recovery program that has been lost.

Enough already with more golf courses. Let's get Calif. on board with this...please!

Thank You,

A Concerned Nevada resident.

I34-1

I34-1

The commenter's belief that restoring the area is more important than maintaining the golf course is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**restore upper truckee river project**

PHYLLIS CLIFTON [p-clifton@att.net]

**Sent:** Wednesday, October 06, 2010 12:32 PM

**To:** Project, Upper Truckee

I35

I am Phyllis Clifton, I am a retired certified Medical Assistant. I have lived at South Lake Tahoe for 43 years. My husband deceased was a firefighter for City SLT for 20 years. We both enjoyed golf and I still do. This keeps the only

affordable 18 hole golf course at Lake Tahoe. The area where the nine holes would be moved are not pristine and the land swap will give Washoe Meadows State Park a better piece of land along the upper truckee river. The local golf course is critical to our economy. It provides jobs, needed revenue for

the California State Parks and adds \$6 million dollars to our economy each YEAR!

So I am voting for Alternative 2

Phyllis Clifton  
1890 Bakersfield St  
South Lake Tahoe, Ca. 96150

I35-1

I35-1

The commenter's support for Alternative 2 and its economic and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



## Upper Truckee River Restoration

David Cloutier [dcloutier1@clearwire.net] on behalf of David Cloutier  
[david@davidcloutier.net]

**Sent:** Saturday, October 30, 2010 12:01 PM

**To:** Project, Upper Truckee

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I wish to submit my support for Alternative #2 to respond to the environmental needs while still maintaining a viable economic resource. | 136-1

David Cloutier  
NV Broker-Salesman  
CA Broker # 01105564  
Coldwell Banker Select Real Estate  
Lake Tahoe, NV & CA  
[david@davidcloutier.net](mailto:david@davidcloutier.net)  
800-LkTahoe (558-2463)

I36-1

The commenter's support for Alternative 2 and its economic and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.





**FW: CALL TO ACTION - LAKE TAHOE GOLF COURSE IS AT RISK!**

Sharon Kerrigan [sharon@STAOR.org]

**Sent:** Friday, October 29, 2010 11:24 AM

**To:** Project, Upper Truckee

**Cc:** Jill Stanton-Bricker [jill@tahoeremax.com]

---

To whom it may concern:

Please accept the following public comment from Doug Clymer, REALTOR® member of the South Tahoe Association of REALTORS® and real estate agent with Chase International South Tahoe Realty.

Thank you,

Sincerely,

*Sharon Kerrigan*, ePro

Executive Vice President

South Tahoe Association of REALTORS

Phone: 530.541.7007 / Email: <mailto:sharon@staor.org>

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**From:** Doug Clymer [mailto:doug@dougclymer.com]

**Sent:** Friday, October 29, 2010 11:07 AM

**To:** sharon@staor.org

**Subject:** Re: CALL TO ACTION - LAKE TAHOE GOLF COURSE IS AT RISK!

I concur with Carl Fair's assessment last week in the Tahoe Tribune " Letter to the Editor." I feel the golf course design could be improved and the negative environmental impact on the Truckee River could be lowered with the addition of 9 new holes. The existing nine holes, to be eliminated, would close the day the new nine holes open. No temporary nine hole course until the completion of the new nine.

Sincerely,

Doug Clymer

137-1

I37-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. State Parks would attempt to have new holes available for play before restoring existing holes. See Chapter 2, "Project Description," of this final EIR/EIS/EIS for an updated construction schedule.

November 14, 2010

I38

To: CA Department of Parks and Recreation, Upper Truckee River Restoration and Golf Course Reconfiguration Project Manager

From: Theresa Cody  
2505 Blitzen Road  
South Lake Tahoe, CA 96150

I am a 10 year resident of South Lake Tahoe, and a professional in the community. I'm very familiar with the project area, from working in the field at this and many State Parks when I worked for the DPR, and from recreating in the Washoe Meadows State Park regularly since I've lived here.

First, I am very supportive of this project. The Upper Truckee River needs restoration, particularly in this degraded reach. When I first became familiar with this reach of the river nearly 10 years ago, it already showed signs of degradation. Several areas had failing banks and the golf course bridges were causing even more bank erosion and river deepening. Since then, I've witnessed the banks of the Upper Truckee River through this area recede further, with active slumping present along this entire reach after large river flows. I support any project alternative that restores the river completely, including restoring the aquatic habitat and floodplain function, which Alternatives 1 and 4 do not accomplish.

That being said, I believe that Alternative 2 is the clear choice for this project, in that it would restore the river and habitat while maintaining the Golf Course and associated community benefits. This project is necessary for the Lake Tahoe Basin as it has the potential to reduce sediment delivery to the lake, improve aquatic habitat in a river that is being considered for Lahontan Cutthroat Trout reintroduction, improve the Golf Course, improve the natural outdoor recreation opportunities in the project area, and connect a highly desirable recreational area to local trails. Alternative 2 is the only option that would accomplish all of these outcomes.

Under Alternative 2 there is an opportunity to return many acres of disturbed land currently being occupied by the golf course to restored floodplain meadow. This is a rare habitat in the Tahoe Basin, and has much greater value than the previously disturbed upland areas where the new golf course holes would be relocated. The riparian corridor along the river would provide habitat to native wildlife species, provide fishing habitat where none currently exists (no access allowed within the golf course), and improve other river recreation opportunities.

One of the understated benefits of Alternative 2 is the access that it would provide across and along the river that is not available now. This alternative also would connect several neighborhoods by maintained trails, rather than the unmaintained trails that require entering a closed golf course which are present now. The new trail segments also connect

I38-1

I38-2

to regional trails, which should be emphasized more in this document, since regionally connected trails are lacking in this community, particularly in this area.

138-2  
cont.

Finally, the rafting and kayaking effects of the project are potentially a huge benefit. I live in Christmas Valley, and love to raft the Upper Truckee River. Currently, we drive to Elk's Club to get on the river because of the shallow waters, wood and other obstructions, and the risk of golf balls from the golf course if we raft or kayak through the State Parks reach. This project has the potential to provide a better rafting and kayaking experience through this area. The potential benefits of this project if any of the full channel restoration alternatives (Alternatives 2, 3 or 5) are selected should be addressed further in the EIS to completely disclose the project effects.

138-3

I appreciate your consideration of my opinion about this project, and the time and effort that was invested into this detailed study for a very necessary project. I hope that the thorough analysis that was completed and the overwhelming evidence that Alternative 2 is the superior choice for this project area will urge you to approve that option.

138-4

Sincerely,

Theresa Cody

- I38-1            The commenter’s support for Alternative 2 and its environmental and community value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- I38-2            The commenter states that the trail improvement benefits were understated in the draft EIR/EIS/EIS. See Master Response Section 3.5, “Recreation,” for additional discussion of trail improvements.
- I38-3            The commenter states that the beneficial effects of kayaking and boating need to be discussed further. See Master Response Section 3.5, “Recreation,” for a discussion of recreation access to boaters.
- I38-4            The commenter’s support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**upper truckee river**

USERRAMP [userramp@aol.com]

**Sent:** Thursday, September 16, 2010 6:39 PM

**To:** Project, Upper Truckee

I39

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I am looking forward to the work going to be done on the river. It will make it a something for all of our kids to enjoy for years to come. I can not wait to see the new golf course design. I think it will bring more golfers to South Lake Tahoe and the surrounding area will benefit from this. I have talked to golfers on the golf course and they say the same thing, that it will bring more golfers to the area, and have an impact as far as jobs and business go. Also I look forward to walking in the park where the old holes were and not worry about the ground where you are stepping where it is uneven. It should be a great place to picnic and watch the river and people.

I39-1

Larry C.

Letter  
I39  
Response

Larry Coffman  
September 16, 2010

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I39-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**uninformed**

USERRAMP@aol.com [USERRAMP@aol.com]

**Sent:** Tuesday, October 12, 2010 5:58 PM

**To:** Project, Upper Truckee

The people that opposed to changing the golf course are not fully aware of what is happening. They seem to be coming in with miss information. I don't know where they are getting it from, but they need to dig a little deeper to find out more. Washoe Meadows Community say that a majority of golfers are opposed to Alternative 2, not the ones I have talked to. Again I think they need more information.

I read an article in the Sac.Bee, and a person wrote in saying it would cost 10s of millions of dollars for this to happen. When I was at the meetings held three years ago, there were around 90 people there and we were split into 10 discussion tables with maps and the purposed changes that might happen. We discussed what we would like to see happen, some wanted to save the area in question to ride there horses there and bikes and hike on the trails. What would happen if the golf course was 9 holes instead of 18. We thought that closing it down would be a real disaster from losing income to Tahoe and losing jobs and a money making recreation area for here.

During the summer there is about 35,000 rounds of golf played at the golf course, price ranging from \$25.00 to \$84.00 depending on the day of the week and the time of day. As far as moving the nine holes to save the river I am for that. And the land where the old holes were located they can ride there horses, bikes and make new trails to hike on. I wonder how many people use the old quarry and sand pit. Do the people who are opposed to the change have some sort of count of these people? I would like to see Alternative 2 go through and the river restored.

Larry J. Coffman  
1655 Bakersfield St  
South Lake Tahoe, Ca 96150  
userramp@aol.com

I40-1



I40-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

To whom it may concern,

My Husband and I bought our Cabin on Chilicothe St. in 1987. We have had many years of enjoyment there. We are now in the 4<sup>th</sup> generation of Family enjoying the peace and quiet of So. Lake Tahoe, especially the State Park and Meadow behind our Cabin.

As we are on the same side of the Street where the Golf Course will be, and our property will be very near the Greens, we are especially concerned about our time at our Cabin not being as peaceful and quiet as it is now.

One of our concerns is the Wildlife. We see many Bears, Coyote and many small animals now. Where will they all go when their Habitat is torn up, moved, interrupted? Part of the Beauty of Tahoe is watching them enjoy their territory that also belongs to them as well as us.

We have enjoyed many walks along the River and in to the Meadow with our Family and Friends and taken pictures, watched the Birds and Squirrels scamper and run and just be themselves. What will happen to all of this?

I realize the Golfers enjoy their time on the course, my Husband is a Golfer, but please keep the Golf Course away from the Families that are trying to get some relaxation and quiet time.

Thank You,

Barbara and Roger Copeland  
2074 Via Rancho  
San Lorenzo, CA. 94580  
[Tex4ark@sbcglobal.net](mailto:Tex4ark@sbcglobal.net)

843 Chilicothe St.  
So. Lake Tahoe, CA. 96150

I41-1

I41-1

The commenters have concern about the proposed golf course being adjacent to their cabin and the effects on common species habitat from reconfiguring the golf course. See response to comment I6-3 for a discussion of the buffer and screening of the reconfigured golf course under Alternative 2. See Master Response Section 3.3, "Biological Resources," for a discussion of wildlife habitat.

I42

**Upper Truckee River**

William G. Copren [wgcopren@gotsky.com]

**Sent:** Sunday, November 14, 2010 2:42 PM  
**To:** Project, Upper Truckee  
**Cc:** John Williamson [FlyFisher@JohnSWilliamson.com]; Paul & Sheri Roen [sproen@aol.com]

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Dear Sirs:

I have reviewed the information about the proposed project along the upper Truckee River in South Lake Tahoe. Please consider adopting Alternative 3 for the proposed project. I am concerned about the degradation of the Truckee River which could occur if Alternative 2 should be chosen. I, as a share holder in the Sierra Valley Water Company which has water rights on the Truckee River system have additional concerns. Any water taken from the river or from the ground water in the Tahoe basin reduces the amount of water entering the lake and the opportunity for water to exit the lake into the Truckee River. Ground water in the Tahoe basin moves, eventually, into the lake and new wells projected in Alt. 2 will reduce the water in Lake Tahoe. Such a removal could be in direct violation to the signed Truckee River Operating Agreement and may be illegal. If such taking reduces the flows below the amount needed to meet the Floriston rates on the Truckee River it will automatically impact the Sierra Valley Water Company's water rights. We are concerned with any such taking. Sincerely, Bill Copren My email address is [wgcopren@gotsky.com](mailto:wgcopren@gotsky.com) My address is P.O. Box 95 Sattley, CA 96124

I42-1

I42-1

The commenter's support for Alternative 3 and concerns about Alternative 2 are noted. The commenter has concerns about water rights and water use. For clarification, no additional wells are proposed under Alternative 2. See Master Response Section 3.4, "Hydrology, Flooding, Geomorphology, and Water Quality," for a discussion of water use and water rights.

k

**Washoe Meadows State Park**

Aaron Culp [ajculp@att.net]

**Sent:** Sunday, September 05, 2010 3:31 PM

**To:** Project, Upper Truckee

I43

This is in request that you consider keeping Washoe Meadows State Park in its current state of low impact, affordable recreation. A decision to expand the Lake Tahoe Golf course into the parks interior will endanger its diverse habitat, and fragment its make-up which is loved by many local residents and visitors. Please, let us not compromise additional environmentally sensitive land for the pleasure of a select group.

I43-1

Jennifer Culp, local resident and  
concerned citizen

I43-1

The commenter's opposition to Alternative 2 and support for maintaining low-impact, affordable recreation at Washoe Meadows SP is noted. The commenter has concerns about wildlife habitat. See Master Response Section 3.3, "Biological Resources," for a discussion of habitat.

**From:** Curtis John [mailto:curtis@hsrei.biz]  
**Sent:** Thursday, August 26, 2010 7:31 AM  
**To:** Walck, Cyndi  
**Subject:** RE: Lake Tahoe Golf Course

**Regarding the changes to the Lake Tahoe Golf Course:**

I believe the California State Parks should **adopt Alternative 2.**

This would restore the Upper Truckee River, enhance the surrounding wetlands/animal habitat and reduce silt flowing into Lake Tahoe while **keeping our 18 hole golf course** by moving 9 holes to a currently available area outside the river flood plain.

144-1



I44-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**From:** Curtis John [mailto:curtis@hsrei.biz]  
**Sent:** Wed 9/22/2010 12:28 PM  
**To:** Project, Upper Truckee  
**Subject:** Upper Truckee River Restoration & Golf Course Reconfiguration Project EIS Comment

To: Cyndie Walck, Sierra State Parks

I am a resident of Lake Tahoe and I believe the California State Parks should adopt Alternative 2 as outlined in the draft EIS/EIR/EIR document because it is good for the lake and the local economy/community.

From my perspective, a few of the reasons to adopt Alternative 2 are:

- 1) It restores the Upper Truckee River, enhances the surrounding wetlands and animal habitat and reduces silt flowing into Lake Tahoe.
- 2) It keeps the 18-hole golf course open by moving 9 holes to a currently available area outside the river flood plain.
- 3) This alternative would keep the only affordable, regulation size, 18-hole golf course in Lake Tahoe.
- 4) The proposed new area (outside the flood plain) for the new 9 holes is currently a blighted area that would be positively affected by development of the new 9 hole tract.
- 5) Reducing this golf course to 9 holes or removing the course entirely will deprive the area of a major recreation opportunity currently provided by our California State Parks (speak nothing of reducing State Park revenue – removal of LTGC is likely to result in reductions in other areas, even elimination of other State Parks). Removal of the golf course, or reducing it to 9 holes will most certainly deter golfers from other regions from visiting South Lake Tahoe, and thus reduce number of hotel room-nights, number of restaurant visits, and other tourist activities, which will result in job loss and reduced revenue to the community.
- 6) In addition to the beautiful surroundings, South Lake Tahoe is attractive golf destination because it has an affordable 18 hole championship course. (Edgewood IS NOT AN ALTERNATIVE AS IT COSTS MORE THAN \$200.00 PER PLAYER PER ROUND.) Without Lake Tahoe Golf Course, people will choose alternate golf destinations.
- 7) The local golf course is critical to our local economy. The impact to our already fragile local economy would be negatively impacted by as much as \$6 million dollars each year if the golf course were removed.

We need to vote for Alternative 2. **It is a good compromise for our community AND the lake.**

Thank you,  
 Curtis R. John  
 1392 June Way  
 South Lake Tahoe, CA 96150

I45-1

I45-1

The commenter's support for Alternative 2 and its environmental and economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. The commenter's statement that Edgewood is not affordable is also noted.

**Comment on Upper Truckee River Restoration Project**

Tim Dallas [timdallas48@earthlink.net]

**Sent:** Thursday, November 04, 2010 11:22 AM**To:** Project, Upper Truckee

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Cyndie Walck / Project Managers,

Thanks for the opportunity to comment on the Upper Truckee River Restoration and Golf Course Reconfiguration Project. My wife and I bought a house last year very near the Washoe Meadows State Park and we enjoy the area very much. We also understand the need to properly manage the developed lands around Lake Tahoe to limit pollution and excessive sediments from entering the Lake, and that's why we believe that protecting riparian habitat in the Tahoe basin is vital to the long-term health of the Lake Tahoe ecosystem. In terms of the project options, having a large golf course in this area at all was probably not the best idea in the first place; however, it is a long established recreation site and we understand the economic value of retaining a golf course. I believe the the healthiest option would be #5, to remove the golf course entirely and plan the whole area for low impact recreation. However, recognizing the economic and recreational value of a golf course, I believe option #3 would be the next best option with the golf course being limited to one side of the river with a sufficient riparian buffer zone on the golf course side to protect the natural drainage, as well as the plant and wildlife resources.

I46-1

Again, thanks for your consideration.

Tim Dallas

local address: 473 Lake Tahoe Blvd., South Lake Tahoe, CA  
mailing address: 868 Brittany Lane, Concord, CA 94518  
phone: 925-686-1386

I46-1

The commenter's primary support for Alternative 3 followed by support for Alternative 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Alternative2**

Greg Daum [design-scapes@sbcglobal.net]

**Sent:** Wednesday, September 22, 2010 9:59 PM

**To:** Project, Upper Truckee

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Hi,

I have attended 2 meetings on the Upper Truckee Restoration project and I vote for Alternative 2. It is a win win. It is the most thought out improvement for our lake and our economy I have ever seen in this community, and I am a lifetime resident! Kudos for helping us to understand the science behind it, the foresight for the grants, and considering the economy and the effect on the other parks that need funding. Whoever got this ball rolling is a true leader without a short sighted vision for any certain agenda. As you may already know please be aware of the new federal ADA Title II and III taking effect in March 2011 regarding golf courses, so it doesn't jeopardize your planning. Thank you,

147-1

Carol

I47-1

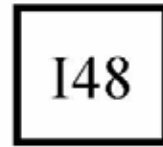
The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Lake Tahoe Golf Course project**

Greg Daum [design-scapes@sbcglobal.net]

**Sent:** Monday, October 18, 2010 6:03 PM

**To:** Project, Upper Truckee



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As a local business owner I support Alternative #2 which was presented at a Meyers community meeting, to keep 18 holes at the golf course which helps our economy and and the CA parks system and our precious Lake Tahoe. It is a win win for California state parks and our local economy.  
Thank you,

| 148-1

Greg



I48-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Alternate #2 golf course**

J Daum [hemi.cuda@sbcglobal.net]

**Sent:** Monday, October 18, 2010 5:55 PM

**To:** Project, Upper Truckee

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As a 4th generation Tahoe local and a Meyers resident attending a Meyers Roundtable meeting I support Alternative #2 moving 9 holes of the Lake Tahoe Golf Course to a new location. It is in the best interest of the Lake, the environment, business and recreation.

| 149-1

Jake Daum

I49-1

The commenter's support for Alternative 2 and its environmental, economic, and recreational value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**From:** ddsitca@aol.com [mailto:ddsitca@aol.com]  
**Sent:** Tuesday, August 31, 2010 5:31 AM  
**To:** Utproject@parks.ca.gov  
**Subject:** River Golf Course EIR/EIS/EIS

When I first heard there was talk of developing Washoe Meadows State park into a golf course (alternative 2) I had to laugh. It seemed unlikely that with the with the TRPA governing Lake Tahoe development no golf course would ever be relocated onto a California State Park. Washoe Meadows consists of meadows and woodlands. It would be highly inappropriate to move a golf course onto this environmentally sensitive land, destroying a wildlife corridor to the greater Tahoe basin. The park land serves the California's State park mission statement; "to provide for the health, inspiration and education of the people of California by helping to preserve the state's extraordinary biological diversity, protecting its most valued natural and cultural resources." Alternative 2 would fragment the park and destroy the wildlife habitat. The Tahoe Regional Planning Agency is supposed to lead the effort to preserve, restore and enhance the unique natural and human environment of the Lake Tahoe region now and in the future. So how possibly, have the TRPA and California Department of Parks and Recreation, teamed up to develop a golf course on the state park land? Washoe Meadows State Park was created in order to save "an environmentally sensitive parcel for the purpose of protecting a unique and irreplaceable watershed." This golf course reconfiguration project is being sold to the general public under the guise of restoring the Upper Truckee River, when in fact, it will double the number of golf course fairways bordering the river. While much can be written about the devastating impacts of prior land use policies, alternatives to the proposed golf course redevelopment do exist, and with far less environmental impact. Washoe Meadows state park in its current state, serves the entire community, as a low impact, affordable recreation alternative. Today, as I entered the park and read the sign proclaiming all plant and wildlife protected, I had to ponder; protected from whom?

150-1

Sincerely,  
Dave Davis  
1321 Mountain Meadow Drive  
South Lake Tahoe, Ca 96150

I50-1

The commenter has concerns about impacts on wildlife habitat and consistency of the project with State Parks' mission statement. See Master Response Section 3.3, "Biological Resources," for a discussion of wildlife habitat; see Master Response Section 3.2, "Land Use," for a discussion of consistency with State Parks' policies and mission statement.

**American Golf**

john dayberry [jdayberry@sbcglobal.net]

**Sent:** Monday, August 30, 2010 7:45 AM

**To:** Project, Upper Truckee



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Can you explain to me why American Golf Corp. is the only "player". The USFS puts properties like this out for prospectus allowing businesses to bid on the concession. Why only AGC if the 20 year lease is up?

| 151-1

Thanks for clearing this up.

John Dayberry

I51-1

The commenter's concern about American Golf is noted. The concessionaire contract will go out to bid to any concessionaire interested in the contract after a decision has been made about which alternative is selected. State Parks will evaluate all proposals before selecting a concessionaire. Because it has not been determined which alternative will be selected for implementation, it is premature to renew the current contract; therefore, American Golf is proceeding under the existing contract. American Golf has been involved with the planning process, because of its long history and knowledge of the golf course.

**Comment on UT Project**

John Dayberry [john@nativeelementsoftahoe.com]

**Sent:** Monday, November 15, 2010 3:55 PM**To:** Project, Upper Truckee

Thank you for allowing our input on the Upper Truckee River Project. The river restoration piece of Upper Truckee Project will clearly be able to show an improvement towards the goals we are all trying to reach in respect to TDL, habitat improvement, hydrological function and many others to the most important reach in the Da'ow (Tahoe) Basin. I would also like to give praise to the restoration project done in the old quarry area collaboratively relocating soil from the Keys Wetland restoration project resulting in a substantial saving with improvement to the "Wildlife Enhancement Area" of Washoe Meadows State Park and the Tahoe Keys.

Recognizing the triple bottom line, the golf course has generated huge revenues over the years but as a person that recreates there weekly, I see very little reinvestment in the park. This clearly demonstrates the lack of sustainable and community building practices. South Lake Tahoe is plagued with large property owners taking profits out of our town and letting buildings and lands degrade to blight and then ask for tax breaks and handout to upgrade these properties. Also I see no "alternatives" in the alternatives except golf.

Relocating the golf course into the Wildlife Enhancement Area will not improve and most likely degrade water quality, existing recreation opportunities, wildlife corridors, public access and has no redeeming environmental assets. Please consider creating positive change and true alternatives to the park embracing low impact sustainable recreation.

The river relocation and restoration is desperately needed and the project should not be tied to the construction of the golf course that caters to two groups (battery propelled golfers & gasoline powered snowmobilers). Please consider who is being excluded or effected by moving the golf course: Runners, X-C skiers, bikers, kayakers, hikers, walkers, equestrians, dog walkers, fishermen & women, bird and wildlife viewers and children like my daughter (11) who loves to jog two miles past the old milk barn to her Grandparents house on the other side of Washoe Meadow State Park.

Thank you,

John Dayberry  
2142 Oaxaco St.  
S.L.T., CA 96150

I52-1



I52-1

The commenter disagrees with combining golf course construction with river restoration. See the following master responses and response to comment:

- ▶ Master Response Section 3.3, “Biological Resources,” and response to comment AOB8-6 for discussions of quarry areas and soil piles;
- ▶ Master Response Section 3.3, “Biological Resources,” for a discussion of wildlife habitat; and
- ▶ Master Response Section 3.5, “Recreation,” for a discussion of the effects of reconfiguring the golf course under Alternative 2.

**Comments on Upper Truckee River Project Draft EIR/EIS/EIS**

Tom Deeble [tdeeble@aol.com]

**Sent:** Sunday, November 14, 2010 10:57 PM**To:** Project, Upper Truckee

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November 14, 2010Comments on the Upper Truckee River Restoration & Golf Course  
Reconfiguration Project Draft EIR/EIS/EIS

Sent via e-mail to utproject@parks.ca.gov

Based on the Project Alternatives presented, we support Alternative 2, which includes relocation of some of the golf course to the west side of the Upper Truckee River. However, there appears to be many valid concerns presented by the Washoe Community Organization that still need to be addressed.

With the poor financial condition of the State of California, and the recent rejection of California State Proposition 21 that would have provided the state parks with a stable support base, it seems imperative to maintain a full 18-hole golf course. This will continue to provide income to support other areas of the state park system. We feel golfing is one of many valid recreational uses of public land.

If Alternative 2 is the approved alternative, then the needs of other recreational users of the state park must be supported. These recreational activities include hiking, mountain biking, river access, cross country skiing, snowshoeing, etc. For example, the proposed new bridge that includes access for pedestrians, should not impede their flow. If a gate is needed to prevent use by snowmobiles, then the gate should be designed to allow snowshoeing and cross country skiing without requiring users to crawl under or over a gate. Also, the new restroom to be built on the west side should include access by non-golfers during normal golf course operating hours.

We look forward to more river access via the new bike/hike trails - especially the connection to the new bike trail starting at Saw Mill Road. We also look forward to improved access to the west side of the river without feeling like trespassers of the golf course. With the "pedestrian safe zones" on the west side it looks like we should still be able to explore a large part of the Washoe Meadows State Park.

While it would still be great if the golf course could stay strictly on the east side of the Upper Truckee River, it seems like Alternative 2 is the best at this time.

Sincerely,  
Tom & Debbie Deeble

1220 Country Club Drive  
South Lake Tahoe

TDeeble@aol.com

153-1

I53-1

The commenters' support for Alternative 2 is noted. These commenters have concerns about recreation access for and use of the proposed restroom by nongolfers. The restroom facility would be available to nongolfers. See Master Response Section 3.5, "Recreation," for additional information about recreation access.



- I54-1           The commenter asks what new EIRs and studies of wildlife and recreational uses have been done since the Angora Fire. Impacts of the Angora Fire on common wildlife and recreational users are largely unknown and unstudied. Alterations to use patterns would be difficult to study without pre–Angora Fire population and use data, which is outside of the scope of the draft EIR/EIS/EIS. In general for wildlife, the postfire ecosystem will follow an ecological succession that will lead to increases in species diversity and abundance (over preburn conditions) within the burn area. Wildlife displaced by the fire could be using portions of the study area in greater numbers than before the fire; however, because of the increase in forage and structural diversity that accompanies ecological succession within the burn area, wildlife will likely return to the burn area to take advantage of the increased habitat quality in that location. For recreationists, almost the same pattern could be expected: increased use would accompany increased habitat diversity where wildlife and scenic views improve.
- Speculative information on changes to use patterns based on the Angora Fire was not included in the draft EIR/EIS/EIS, and the baseline information provided remains accurate. Under CEQA, the baseline has been defined as existing conditions at the start of the environmental review process (i.e., around the date of issuance of the NOP) (State CEQA Guidelines, Section 15126.2). Therefore, the baseline used for evaluating impacts of the project was the date the NOP was issued (approximately August 2006), with additional information obtained during the environmental review process to update the understanding of current conditions.
- The study area provides potential habitat for a variety of wildlife species, as described in Master Response Section 3.3, “Biological Resources.”
- I54-2           The commenter believes that there was undue bias toward selecting Alternative 2 as the preferred alternative. See response to comment AOB8-1 for discussions of the selection of a proposed Preferred Alternative and of the public participation process.
- I54-3           The commenter believes that ongoing logging activities also show undue bias toward selecting Alternative 2. See response to comment AOB4-5, which describes considerations for reconfiguring the golf course. As described in Section 3.14, “Human Health and Risk of Upset,” of the draft EIR/EIS/EIS, tree removal is part of State Parks’ current fire and vegetation enhancement management practices and is addressed as part of the Riparian Hardwood Restoration Project. State Parks has been doing forestry management throughout the study area since 1995. As mandated by the fire prevention and suppression policy in the *Lake Valley State Recreation Area General Plan*, a wildfire management plan has been implemented for Lake Valley SRA and Washoe Meadows SP. The plan identifies modified fire suppression methods that preserve sensitive resources in each unit while protecting human lives and property specific to these areas. The *Lake Sector Wildfire Management Plan* provides resource information and fire suppression tactics for both Washoe Meadows SP and Lake Valley SRA.

- I54-4 The commenter has concerns about impacts on wildlife, fens, cultural resources, and consistency with the 1984 litigation settlement agreement and statute. See the following master responses and response to comment:
- ▶ Master Response Section 3.2, “Land Use,” for a discussion of the settlement agreement from the 1984 litigation;
  - ▶ Master Response Section 3.3, “Biological Resources,” for discussions on wildlife habitat and fen location;
  - ▶ Master Response Section 3.6, “Cultural Resources,” for a discussion of protection and access to cultural resources; and
  - ▶ response to comment AOB4-5 for a discussion of considerations for selecting the location of the reconfigured golf course.
- I54-5 The commenter requests information about funding. See Master Response Section 3.7, “Economics.”
- I54-6 The commenter’s concern of undue bias toward Alternative 2 is noted. See response to comment AOB8-1 for discussions of the selection of a proposed Preferred Alternative and of public involvement.

Hillary Dembroff  
PO Box 9484  
South Lake Tahoe, CA 96158  
(530)573-0500

November 3, 2010

California State Parks  
Cyndie Walck

Dear Ms. Walck,

Regarding the Upper Truckee River Restoration /Golf Course Reconfiguration Project, I will hereby describe my opposition to Alternative 2. Please stand in the middle of the meadow, which is the site of the proposed 9 holes of the expanded golf course. Slowly circle around, in order to take in the 360 degree view. Now, please close your eyes and stand in silence for 3 minutes. You may be astonished by the profundity of what you just experienced. The variation of wildlife sounds, the magnificence of this special spot.

Washoe Meadows was deemed a State Park in 1984, in a matter of "highest priority". The properties and reasons for that designation have not diminished. In fact, since the Angora Fire, it is even more precious to wildlife and human visitor alike.

There are alternatives for restoring the Upper Truckee River, without expanding the footprint of the golf course, and moving 9 holes into this unique and sensitive area.

I strongly and humbly ask that the State Parks and coordinating agencies take these factors into consideration and change the preferred Alternative. Perhaps a new alternative needs to be created.

Please think with your intelligent mind, as a steward of our precious environment, and with a respect for community input.

Sincerely,  
Hillary Dembroff

I55-1

I55-1

The commenter's opposition to Alternative 2 is noted. See the following master responses and responses to comments:

- ▶ Master Response Section 3.2, "Land Use," for a discussion of the settlement agreement from the 1984 litigation;
- ▶ Master Response Section 3.3, "Biological Resources," for a discussion of wildlife habitat;
- ▶ response to comment I54-1 for a discussion of the Angora Fire;
- ▶ response to comment AOB4-5 for a discussion of considerations in selecting the location of the reconfigured golf course; and
- ▶ Master Response Section 3.2, "Land Use," for a discussion of land trade.



**Upper Truckee Restoration comment**

Dave DeStefano [allrollsin21@hotmail.com]

**Sent:** Friday, October 22, 2010 3:27 PM**To:** Project, Upper Truckee

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To Whom this may concern,

I am a resident of the Meyers area of South Lake Tahoe, where my family and I reside off of North Upper Truckee rd. We live within walking distance to the Washoe Meadows State Park.

We believe that any proposal involving moving the golf course onto the western edge of the river will adversely effect those living in the surrounding neighborhoods, many of whom use this area of the park on a daily basis. Some activities that the DeStefano family participate in within the park are as follows;

- \* Hiking
- \* Mountain Biking
- \* Swimming
- \* Snowshoeing
- \* Wildlife Viewing
- \* Meditating
- \* Photography

We participate in these activities on a daily basis and see many others using this park as much as us. Although golf may generate more money for the State Park system, it seems to be that the priority of this project is river restoration as well as maintaining the parks integrity for the many activities that this park is used for, other than just golf. Given the options listed, alternative three is judged by myself as being the least intrusive to the local neighborhood population, and best for the river as well. Thanks for your consideration on this important topic which will have far reaching effect on many generations to come.

Sincerely,

David DeStefano  
1892 Ulmecca St.  
South lake Tahoe, CA 96150  
530-957-5176

156-1

I56-1

The commenter's support for Alternative 3 and preference for maintaining the existing boundaries for Washoe Meadows SP is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Upper truckee restoration**

Richard DeVries [rickdevries@att.net]

**Sent:** Monday, August 30, 2010 10:04 AM

**To:** Project, Upper Truckee

I57

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I probably prefer alternative 2. 18 holes should remain for public use and revenue for Ca. Parks system.

| 157-1

Please do not add my address to any mailing list. Thanks

I57-1

The commenter's support for Alternative 2 and its economic and recreation value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

I58

**In support of Alternative 5, or Alternative 3.**

J.Gladden and N.Dion [chezcrik@digitalpath.net]

**Sent:** Sunday, November 14, 2010 1:35 PM

**To:** Project, Upper Truckee

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To whom it may concern:

This email is in support of Alternative 5 of the Upper Truckee River restoration project: Lake Tahoe needs the best conservation efforts available in order to keep its waters pristine. Alternative 3 is the next best alternative that I support since it goes a long way in addressing my concerns about reducing the amount of sediment and pollutants/nutrients entering the lake.

I58-1

Sincerely,

Neil G. Dion  
Clio, California

I58-1

The commenter's primary support for Alternative 5 followed by support for Alternative 3 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**LAKE TAHOE GOLF COURSE**

Brad Dorton [BradDorton@Century21.com]

**Sent:** Saturday, October 30, 2010 11:24 AM**To:** Project, Upper Truckee

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To whom it may concern,

As a resident of Lake Tahoe since 1976, I am a strong advocate of keeping Tahoe clean and blue. As a swimmer and scuba diver, I have seen the deterioration first hand of the Lake with algae growth on the shoreline rocks, as well as, the silt on the bottom rocks down to 130 feet.

The reason I am writing is to ask to be put on the E-mail list for all future information regarding the changing of Lake Tahoe Golf Course. I have played LTGC for years. I understand that it may contribute to the deterioration of the Lake. However, I have also kayaked and canoed that section of the Upper Truckee River from the golf course and I know there are several miles from the golf course to the lake.

The reason I say this is because I find it hard to believe that by altering the golf course, it is going to change the silt which the golf course is allegedly putting into Tahoe. There must some better way of controlling that silt by straining the water flowing into Tahoe or having some sort of settling ponds.

I ask that more research is done to find an alternative method that is more effective and cost effective than altering Lake Tahoe Golf Course. Again, I cannot see how altering the golf course will affect any benefit to the lake.

Please put me on the E-mail list and add this letter to the pile of people who are advocating no change to Lake Tahoe Golf Course.

Thank you for your time and consideration.

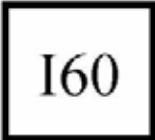
Brad Dorton  
775-790-4325  
brad.dorton@century21.com

159-1

I59-1

The commenter's support for finding an alternative that would maintain the golf course and request to be put on the project's e-mail list is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. See response to comment AOB8-1 for a discussion of alternatives considered but eliminated from further evaluation.





**comments on golf course relocation**

John Drum [johndrum@sbcglobal.net]

**Sent:** Friday, October 22, 2010 3:26 PM

**To:** Project, Upper Truckee

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The following are my comments regarding the state parks plan for Upper Truckee River restoration and Lake Tahoe Golf Course relocation. If the environmental analysis shows an overall net gain to water quality that overrides the potential negative short term disturbances incurred during the project then I am in favor of Alternative 2. During these difficult economic times and yet another ballot initiative seeking voter approval of increased taxes for our deteriorating state parks the revenues from the golf course are critically needed. Especially if they can help to offset the overall costs of the project. In addition, I would like to see this project contribute to overall restoration of the entire area with the continuation of fuel reduction efforts and trail enhancements throughout the northern portion of the project area. Both of which seem to fluctuate year by year with no overall cohesion. And finally, I would also like to see water quality monies used to expedite construction of the chronically delayed Sawmill bike path. Thanks for the opportunity to submit these comments.

Sincerely,  
John Drum

160-1

I60-1

The commenter supports Alternative 2 if there would be an overall net gain in water quality. The commenter requests continuation of fuels management and trail enhancement. The commenter requests that water quality funds are used to expedite construction of the Sawmill bike path which is outside of the scope of this project. As discussed in Chapter 2, "Project Alternatives," of the draft EIR/EIS/EIS, fuels management and trail improvements occur throughout Washoe Meadows SP and Lake Valley SRA under current conditions (Alternative 1) and would continue under all alternatives. See response to comment I54-3 for additional information about fuels management practices. See Master Response Section 3.5, "Recreation," for a discussion of trail connectivity proposed under Alternative 2 and 3 to the Sawmill bike path.

KATHLEEN EAGAN

I61

October 29, 2010

Cyndie Walck, Project Manager  
Upper Truckee Project  
California Department of Fish and Game  
Email: [utproject@parks.ca.gov](mailto:utproject@parks.ca.gov)

Dear Cyndie,

I write to urge you to go forward with the restoration of the Upper Truckee River as proposed. Our Lake Tahoe communities depend on a healthy environment to support tourism...the engine of our economy. And it is a healthy environment that will assure that the appeal we enjoy today will continue into the future.

I fully understand that any change from the status quo will cause concern among various parties. I also fully understand that some degree of compromise from all interests is a part of how we come to workable solutions in our democratic society. As an elected official (Truckee's first mayor and current Board member of the Truckee Tahoe Airport District) and a past president of the Truckee River Watershed Council, I have faced these kinds of compromises on a day-to-day basis. The key is to listen to all concerns, separate fact from fiction and fashion a solution that works for as many interests as possible.

A properly functioning environment is one of those interests. To sustain a healthy community, we must protect those parts of the natural environment that function properly. And we must work to restore past damage that has resulted in compromised natural function. To fail to do both of these things threatens our environment, the clarity of Lake Tahoe and, as a result, the economic well-being of our community. Without a high quality environment, we risk becoming just "any other place".

I believe the proposed project appropriately balances all interests. Again, I urge you to support the proposed project.

Sincerely,

s/Kathleen Eagan

cc: Joanne Marchetta, Executive Director  
Tahoe Regional Planning Agency

P.O. Box 8820 ~ Truckee, CA ~ 96162-8820  
Ph: (530) 587-2730 Fax: (530) 587-5003 E-mail: [kbeagan@sbcglobal.net](mailto:kbeagan@sbcglobal.net)

I61-1

I61-1

The commenter's support for Alternative 2 and its environmental and economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**upper truckee restore thought**

derek edridge [a1draft@yahoo.com]

**Sent:** Tuesday, October 05, 2010 8:28 PM

**To:** Project, Upper Truckee



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Can't we have a fifth option or plan? Couldn't we do alternative number four and restore the original coarse of the river? Looking at the map and plans it looks very plausible and beneficial to all!

162-1

Thanks for attention and time. :)

I62-1

The commenter suggests modifying Alternative 4. The suggestion is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. See response to comment AOB8-1 for a discussion of alternatives considered but eliminated from further evaluation.

**Washoe Meadows State Park; attention Cyndie Walck**

Don & Kay Edwards [kedwards4565@charter.net]

**Sent:** Friday, October 22, 2010 10:03 PM

**To:** Project, Upper Truckee

I63

Dear Cyndie,

Lake Tahoe made the cover of the National Geographic about 3 or 4 years ago with a huge title that said, 'IT'S THE LAKE, STUPID!!!' The article went on to say that Lake Tahoe is a National Treasure because of its clear blue water. All the fancy development, vacation rental houses, and thrill seeking and fun oriented events will only make the basin look more and more like every other overdeveloped place. If we don't stop the nonsense and put the purity of the water first and foremost, and offer reverent recreation and save the history of the area, then Lake Tahoe becomes nothing more than every other overbuilt vacation spot with a lake, some casinos and all the toys and the clear blue water vanishes in the midst of milfoil, clams, & other invasive species.

To do the right thing to keep Lake Tahoe Blue forever, we MUST do the right thing now. The Upper Truckee River is one of the most important filters we have bringing pure snow & spring run off to the meadows and the lake. It is a wildlife corridor. It was the Washoe Indian summer homeland. It has purity, history and a life of its own. Will the golf course disrupt this life? Nobody could deny that fact.

Golf is a fun game that requires a lot of attention to the ball, and balls go out of bounds always requiring trekking out to find them. It is not a compatible game in a mountain habitat, however.

That is why all people and agencies that love nature want to preserve it & become very cautious about the the human footprint causing permanent ruination.

Many people are asking why the State Parks & other agencies are not the protectors of the wilderness that they used to be. We know part of it is MONEY. You need the proceeds from the golf course to pay your overhead.

I hear you all stating that you will protect the SEZ from harm. But I have watched other SEZ projects that were supposed to improve things, that cost millions to complete, but have fatal flaws. The dream of what you want to do so often does not meet reality.

Consequently, those who watch SEZs from natures point of view,

I63-1

strongly oppose tramping through it or over it or under it.

We, the public, who pay the salaries of all your guardian agencies, hold you responsible to protect nature's interest - not abuse it.

This SEZ is ALL OF OURS to protect from harm.

Alternative 3 is the only choice that speaks for nature's interest.

We look to you to make the right decision for our Earth Mother.

Thank you for sharing this with those who are decision makers.

Thank you, Cyndie.

Katherine, Donald, Stephen, Lisa, Kristen, Fred, LeeAnne, Tony, Brian, Ashna and Mayel Edwards

163-1  
cont.



Letter  
I63  
Response

Don and Kay Edwards  
October 22, 2010

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I63-1

The commenters' support for Alternative 3 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

To: Ms. Cyndie Walek  
California State Parks and Recreation, Sierra District  
PO Box 16 Tahoe City, CA 96154

COMMENTS ON THE UPPER TRUCKEE RIVER RETORATION AND GOLF  
COURSE RECONFIGURATION PROJECT

Thank you for the opportunity to comment on this document. We recognize the great effort required to create a document of this size and complexity and appreciate the work you have done. However, we cannot help but think that the task would have been easier had the process leading up to it been conducted a bit differently. Therefore, I preface my comments on the document with the following:

The process of getting to the EIR/EIS/EIR has been a long and difficult one. Beginning with the NOP which was circulated narrowly to residents who live within 500 feet of Washoe Meadows State Park to Public Recreation Planning Workshops held in 2007 to the interval of time when interested parties began their attempts to obtain supporting material needed to make informed comments to the public meetings held in recent months and, finally, to the release of the current document, it has been difficult to have a thorough, open and honest discussion of the alternatives, the environmental pros and cons, the economics, land use with regard to the 1984 Litigation Settlement which established the park and its purpose, water quality, recreation and other aspects of the document that would lead anyone to the conclusion that any Alternative but Alternative 2 might be feasible. When the plan to restore the Upper Truckee River was first announced, there was great excitement and anticipation on the part of the Washoe Meadows Community, other environmental groups and park users who welcomed environmental restoration. People vitally interested in the process include biologists, botanists, planners, golfers, geologists, hydrologists, low-impact recreational park users and others from the community. We envisioned an open, collaborative, dynamic and creative process that would find the best outcome for the river, the park and wildlife while preserving the opportunity for golf. What we found though was a situation where public records requests were time-consuming and difficult, where we had little success in scheduling meetings to discuss ideas and concerns. Our extensive work to find alternative locations for golf holes on the east side of the river were brushed aside as infeasible. At the Recreation Planning Workshops, instead of brainstorming a broad variety of ideas for the park, we were broken into groups and directed to set aside any of our ideas that did not involve moving golf holes into the park. Some participants felt cheated by this approach as they had come there to provide their best thoughts on restoration. Some of them rebelled against the instructions to mark the maps of the park for golf holes and wrote as much on the planning map. It became clear that unless we wanted to enhance plans for Alternative 2 that our ideas were unwelcome. Park staff had decided that Alternative 2 was their preferred alternative. They later changed this to "no preferred alternative" but their public presentations and handouts clearly promoted

164-1

Alternative 2 with reasons given why other alternatives might be infeasible. Indeed, it has been inferred that unless Alternative 2 is chosen that there will be no river restoration.

So, what we had hoped would be a dynamic process that found the very best plan for the park (wildlife, recreation, water quality, fish, economics and the stated purpose at the creation of the park) has become a dreary standoff between proponents and opponents of Alternative 2. The planning process is supposed to include a realistic array of alternatives, a fair and balanced assessment of each alternative and open and honest discussions with stakeholders. Instead we have had a process where few people were notified of the plan, participants were pushed into planning for Alternative 2 regardless of their true preference, a document that now has five alternatives but, in the view of CSP, only one feasible one. The document before is us deeply flawed not only because of numerous inaccuracies, leaps in logic and assumptions but because it, like the public "planning" process has an ulterior motive of herding one and all to acceptance of Alternative 2. We believe that CSP has shown undue bias in favor of Alternative 2.

164-1  
cont.

Of the alternatives we have been given, either 3 or 5 should be chosen over 2.

164-2

\*While fish habitat would be improved by 2, 3 and 5, alternative 2 would line more of the river than ever with golf course and result in harm to newly hatched trout and mature populations from increased exposure to pesticides, fertilizers and herbicides. The experience of fishing would be degraded as anglers do not wish to fish within 100 feet of fairways, greens and tees. The fishing experience would be degraded to one little better than a trout farm. Either 3 or 5 would therefore be better for both fish and anglers.

164-3

\*Alternative 2 would destroy a forest which is home to a great diversity of wildlife, reduce home values for neighbors who sought to live in the woods and eliminate the noise reduction and planet cooling effects offered by forests. Alternatives 3 and 5 would eliminate this adverse effect.

164-4

\*Alternative 2 would threaten and surely damage the unique system of spring complexes, wetlands and fens that exist in the park. Indeed these are cited as one of the compelling reasons for park creation. There is a population of Eastern Brook Trout which live in the streams and deep holes of the bogs and wetlands. Scientists have yet to fully investigate the bog plant communities and trout population which is thought to be truly unique in the Sierra. Either alternative 3 or 5 would avoid this damage. Though the fens and wetlands would be separated from the actual golf course, anyone who plays golf knows that golfers walk far and wide to find a lost ball. This would surely increase damage to fragile areas.

164-5

\*Alternative 2 would threaten habitat for the Sand Lily which finds its only home at Tahoe in the WMSP wetlands. This is thought to be the highest elevation occurrence of the *Leucocrium montanum*.

164-6

\*Alternative 2 would reduce and in some cases, eliminate habitat for common and threatened species. Inadequate surveys for the northern goshawk are a serious flaw in the document. These woods are used by bears, bobcats, pine marten, cougar, long-eared

164-7

owls, golden eagles, pygmy owls, red-tailed hawks, Cooper's hawks, sharp shinned hawks, red-shouldered hawks. The document has an adequate inventory of park species and alternative 2 treats them as insignificant. 3 and 5 do not threaten wildlife in this fashion.

164-7  
cont.

\*Alternative 3 would allow for adequate income from golf. Surveys show that there is renewed interest in executive length and nine hole courses--particularly by women and younger golfers. A challenging and beautiful executive length or nine hole course (which were inadequately explored in the document) would generate adequate income especially if paired with a robust wedding business, river rafting opportunities and so forth. Weddings at Edgewood contribute greatly to their bottom line and the river and Tallac view at the golf course are in many ways competitive with what Edgewood offers.

164-8

\*Alternative 2 would put more golf course parallel to the river than now exists. The 100 foot buffer zone is inadequate to protect fisheries, the river, wildlife and recreational users from poisons used on the course and indeed, the dangers from golf balls.

164-9

\*Alternative 2 would severely restrict river access to park users who have been able, historically, to freely access the river for swimming, picnicking, wildlife observation and relaxation. The many children who frequent these areas in the summer would be subjected to both the pollution and dangers of being adjacent to a golf course.

164-10

\*Alternative 2 violates the 1984 Litigation settlement agreement.

164-11

\*Alternative 2 fractures functioning wildlife corridors--a concept that is dismissed in the document.

164-12

\*In the winter of 2010, a Sierra Nevada Red Fox walked from the park into my back yard. I did not photograph it but F&G set up cameras in an attempt to verify the sighting. While this yielded no SN Red Fox photos, it did capture a pine marten and a porcupine. Not long after the incident at my house, F&G cameras did photograph the SN Red Fox near Sonora Pass. This shows that there is a population of this rare animal in this part of CA and lends credence to my sighting. I believe this should at least be considered during this planning process.

164-13

When the park property was saved from development in the 1980s, many statements were made about the fragile, irreplaceable, unique and varied habitat therein. The dedication sign at the old barn states that the park is dedicated to wildlife habitat and a kiosk held educational materials showing habitats and the wildlife that occupied it. Now the property is described in park presentations as degraded, in need of restoration and of no use to wildlife or people. Interested parties are led to believe that a golf course would be a vast improvement but nothing could be further from the truth. Part of the old quarry was restored with taxpayer money a few years ago and looks good. The other part of the quarry has restored itself and looks good too. The piles of sand and wood chips highlighted on park tours were placed there by park staff! What needs restoration can be restored without the assistance of a golf course. A couple of small restoration projects

164-14

would repair the "blighted" areas and avoid the monoculture destruction nine holes of golf would bring to an otherwise beautiful area. Indeed, when we have taken people (including officials) on tours of the proposed golf course they have, without exception, exclaimed that the area is beautiful and very different from what was presented in selective slides at public meetings.

164-14  
cont.

Public trust is an issue here. Taxpayers were told in the 1980s that this land was fragile and exceptional and that it must be protected. Now they are being told that it is so degraded that a golf course would be an improvement. I doubt the public would have rallied behind the concept of buying the land only to convert it to a golf course. CSP should value and seek to retain the public trust by truly finding the most environmentally responsible way to use land rather than reversing their stance to favor a golf course.

164-15

River restoration should be separated from golf course reconfiguration. River restoration can be accomplished without moving nine holes of golf into a state park. LVSRA has a general plan that calls for reducing the golf course and restoring the river. This should be done and is a legal course of action CSP should pursue. It is illegal to commit park resources permanently to a course of action in the absence of a general plan. Alternative 2 would do this in violation of the law. Alternative 3 would avoid this difficulty.

164-16

An important issue that has seen little or no discussion is project access from Chilcothe Street. It is stated in the document that construction activities would take place over an undeveloped sewer maintenance easement. In order to support this type of use, the road would have to be upgraded by placing fill and perhaps harder surface coverage in the wetland and SEZ. This presents a legal problem because this portion of the easement is on National Forest lands and was purchased with Burton-Santini funds. This Act prohibits road construction. Further, the proposed restroom is adjacent to this undeveloped road easement and it would be reasonable to conclude that maintenance access to the restroom would occur here which would, in turn, necessitate a new road from the facility to the park boundary, across FS lands and into the neighborhood. A commercial haul permit would be needed for these activities. The document also fails to address the impact this would have on the neighbors who reside on Chilcothe and nearby streets.

164-17

The maps prepared for the EIR present an unclear representation of hard surface coverage. The map shows the above referenced access road as a walking path when it may very well be a hardened road used for construction and maintenance. As a matter of scale, the map seems to show pedestrian paths as being several times wider than the paved cart paths. This is unlikely and confusing and may lead to a misinterpretation of how much hard coverage will be placed in a wetland area. From park presentations, we understood that the bridge would be large enough to accommodate everything from trucks to golf carts to pedestrians but on the map the bridge looks like a cart/pedestrian path only. This should be clarified.

164-18

More confusion is created on the maps by the misrepresentation of dry/wet meadows. On recent park walks when we attempted to take interested parties through the proposed golf

164-19

course area opposite the old barn, it was too wet to walk through the area. This error could have dire financial/maintenance/environmental consequences. Not only is this type of meadow unsuitable/illegal for golf course development but having holes in such a location would dramatically reduce the number of months the holes could be played thus reducing revenue.

164-19  
cont.

When we walked the proposed new golf holes with people familiar with golf course construction, costs and maintenance we learned that the steep, hilly areas proposed significantly increase both construction and maintenance costs of a course. The document fails to address this reality.

164-20

The EIR fails to give adequate analysis to the unique hydrology of the spring complexes, fens and wetlands. These areas have not been studied in depth either prior to this proposal nor after the proposal became public knowledge. The downhill slope of the project would convey pollutants from the golf course to the river and aquifers. Because fens receive their water from below rather than from above, the grading and draining from golf course construction and placement would almost certainly change the hydrology of the fens. This could, in turn affect the unique plant communities and threaten the population of Eastern Brook Trout found in these streams and water holes. The document fails to address these issues in any meaningful fashion.

164-21

The EIR does not factor in habitat loss from the Angora fire. Hundreds of acres of forest and other habitat were lost in the fire making WMSP more important than before. To swap a functioning mixed conifer habitat for degraded golf course land near Hwy 50 and Sawmill Road is illegal and indefensible.

164-22

While this project should be all about the environment, lake clarity, habitat for both common and threatened plant, animal and fish species, it has turned out to be (at least at the public hearings) much about money. At all the meetings we have attended, one speaker after the other has talked about the \$800,000 or more that the golf course sends to the State each year and praise is given for the modest fees charged to play the course. However, this discourse is disingenuous and the economic analysis is flawed and misleading.

164-23

\*While citizens have been told that taxpayers would not pay for the new nine holes in WMSP, this is not exactly the truth. The concessionaire would initially provide funding to construct the new holes but they would then raise golf fees along with reducing revenue contributions to the State. This change in the economics would go on for at least ten years or until the public "debt" to the concessionaire was repaid. The analysis does not discuss this loss of income.

164-24

\*Projections for the overall decline of golf, the greater cost for building a course on hilly, steep land, greater maintenance costs, a declining economy are not factored into the financial analysis. We are not told how much revenue would be reduced for those ten or more years nor how much golf fees would be increased. Once (if) costs are recovered, it

164-25

is unknown if golf revenue would ever again attain its high point of \$800,000+ to the State.	164-25 cont.
*Shutting down golf operations for a year or two is treated casually in the document yet, this would reduce money flowing into our economy and would throw current golf course employees into unemployment. This would then cause a demand for unemployment compensation and other social services. If the costs mentioned here were to be projected into overall profits and losses for the LVSRA, it might be found that a nine hole or executive eighteen would come out competitively money-wise.	164-26
*Income for Alternative 3 rather than 2 has not been studied adequately. An increase in play by women and children could occur under Alternative 3 and other sources of income such as weddings could supplement any loss of income. A robust wedding and/ or river rafting business could fan throughout the Meyers economy providing income for lodging, restaurants, caterers, wedding planners, river guides and so forth. Economic benefits of Alternative 3 must be realistically studied.	164-27
*The document does not project the financial effects of the decline of golf in general and does not account for the fact that our largest population growth is in the Hispanic and African American demographics which participate less in golf than the white population.	164-28
*Three times as many golf courses closed last year than opened. With payments for this strung out over ten or more years, we could have worst case scenarios of a half-finished project akin to the hold at Stateline or a completed course that could become an economic burden for the State and taxpayers.	164-29
Lake Tahoe Golf course is not the fifth highest revenue producer in the State Parks system. It is number 46 in field revenue, contributing 1/2 of one percent of field revenues. A poor rationale for destroying a park for golf.	164-30
*The numbers promoted in brochures are unsubstantiated. Projections of tourists who come here for the sole purpose of playing golf on this course were obtained by unreliable methods and are very probably incorrect. The \$6 million supposedly flowing into the local economy from the course is also conjecture. Many people counted as tourists are, in fact, second homeowners and time share residents who play golf here as part of their many recreational endeavors.	164-31
*As we are all painfully aware, chemical and diesel spills do happen as they have at this golf course. These tragic accidents are difficult and expensive to treat. Alternative 2 would increase the potential for such an accident as it places much more golf course parallel to the UTR.	164-32
Washoe Meadows State Park was named in honor of the Washoe Tribe that once lived on the land there. At TRPA hearings on this matter, the representative of the Washoe spoke about the area proposed for the golf course. She explained that the area is rich in artifacts and history and that the golf course would forever prevent her generation and future	164-33

generations from visiting the springs, fens and grinding rocks. It is unconscionable that this result, in this day and age, could be allowed. As the tribal spokesperson said, " This cannot be mitigated."

164-33  
cont.

The various components of the document, coupled with park presentations, work to dismiss the feasibility of alternatives other than Alternative 2. If the golf course were removed entirely under Alternative 5, there would be a decline in revenue but the extent of that is unknown. People would golf elsewhere in our area but they would still come to Tahoe. Revenue to the CSP might decline but weddings, river rafting, a groomed cross country ski course and other lower impact activities would generate income for parks. It might slip to lower than #46 in field revenue but would generate income. Alternative 3 represents a compromise. It should be constructively considered.

164-34

It is not too late to shift gears and look at Alternative 3 as a solution with great promise, one that could honor the mission of CSP, the will of the people and the terms of the 1984 Litigation Settlement Agreement. Let's all go back to the drawing board with renewed vigor and a cooperative spirit and develop an alternative that is in keeping with the above. This can be done in a timely fashion, the river can be restored and the park can be preserved.

164-35

Thank you again for the opportunity to provide comments.

David and Carla Ennis  
PO Box 10985  
South Lake Tahoe, CA  
96158



- I64-1 The commenters question the adequacy of the public involvement process, selection of a preferred alternative, and consistency with the settlement agreement from the 1984 litigation. See the following responses to comments and master response:
- ▶ response to comment AOB31-13 for a discussion of the public involvement process;
  - ▶ response to comment AOB8-1 for a discussion of the selection of a proposed Preferred Alternative; and
  - ▶ Master Response Section 3.2, “Land Use,” for a discussion of consistency with the settlement agreement from the 1984 litigation.
- I64-2 The commenters’ support for Alternative 3 or Alternative 5 over Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- I64-3 The commenters’ support for Alternative 3 or Alternative 5 over Alternative 2 as related to fishing is noted. See response to comment AOB8-7 for a discussion of the golf course/river buffer; see response to comment I20-2 for a discussion of trout.
- I64-4 The commenters have concerns about tree removal and wildlife habitat under Alternative 2. See Master Response Section 3.3, “Biological Resources.”
- I64-5 The commenters have concerns about impacts on the fens, wetlands, and brook trout under Alternative 2. See Master Response Section 3.3, “Biological Resources,” for a discussion of sensitive resources, including impacts on fens and wetlands. The commenters are concerned that eastern brook trout found in or near the fen would be affected by implementation of Alternative 2. As described in Master Response Section 3.3, “Biological Resources,” the fen and surrounding area would not be affected by implementation of Alternative 2 because the fen is located outside and upslope of any proposed habitat alterations, as is the “underground stream” with the brook trout. In addition, brook trout (sometimes referred to as eastern brook trout), *Salvelinus fontinalis*, is an introduced nonnative species that is not specifically protected under CEQA or NEPA, or by TRPA. Impacts on common wildlife species and fisheries are found in Section 3.5, “Biological Resources,” of the draft EIR/EIS/EIS.
- I64-6 The commenters have concerns about impacts on sand lilies under Alternative 2. See response to comment I7-4.
- I64-7 The commenters have concerns about impacts on wildlife habitat and effects on common species under Alternative 2. See Master Response Section 3.3, “Biological Resources.”
- I64-8 The commenters state that income under Alternative 3 would be sufficient. The comment is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

- I64-9 The commenters state the opinion that the 100-foot buffer proposed under Alternative 2 for the golf course reconfiguration area is insufficient. See response to comment AOB8-7 and Master Response Section 3.3, “Biological Resources”
- I64-10 The commenters have concerns about river access under Alternative 2. See Master Response Section 3.5, “Recreation,” for a discussion of recreation access.
- I64-11 The commenters question the consistency with the settlement agreement from the 1984 litigation. See Master Response Section 3.2, “Land Use,” for a discussion of consistency with the 1984 litigation settlement agreement and statute.
- I64-12 The commenters have concerns about the adequacy of the impact analysis on wildlife corridors. See Master Response Section 3.3, “Biological Resources.”
- I64-13 The commenters have concerns about the adequacy of the impact analysis on wildlife. See Master Response Section 3.3, “Biological Resources.”
- I64-14 The commenters believe that the area described for golf course reconfiguration is inaccurately described and refers to the barn area and the quarry area. For clarification, Alternative 2 does not propose project modifications in the barn area. For a discussion of the quarry area, see response to comment AOB8-6.
- I64-15 The commenters have concerns about the public trust. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- I64-16 The commenters have concerns about moving forward with Alternative 2 without a general plan and consistency with Lake Valley SRA General Plan. Golf course reconfiguration cannot be separated from river restoration, as a separate project because the need to remove or relocate golf course holes is only due to the need to allow room for river restoration. Segmentation of the project is not allowable (PRC section 15378 – “whole of the action”). See Master Response Section 3.2, “Land Use,” for a discussion of general plan requirements.
- I64-17 The commenters have concerns about project access from Chilicothe Street through National Forest System lands purchased with Santini-Burton Sensitive Land Acquisition Act funds. See response to comment I7-2.
- I64-18 The commenters have concerns about permanent needs for access from Chilicothe Street for golf course maintenance. See response to comment I7-3. For clarification, the bridge would be wide enough for a two-lane cart path. Commenter has concerns with the maps in the EIR. The map line widths are not necessarily to scale, but are used for demonstration and approximation. However, all coverage calculations were made using actual existing or proposed areas to assess impacts. The bridge will accommodate golf carts, pedestrians, and service/ maintenance vehicles.
- I64-19 The commenters believe that areas identified as dry meadow are really wet meadow. The area near the old barn is outside the project area. See Master Response Section 3.3, “Biological Resources,” for additional details about vegetation. Also see Chapter 5, “Corrections and Revisions to the Draft EIR/EIS/EIS,” for text changes related to vegetation.
- I64-20 The commenters believe that the draft EIR/EIS/EIS fails to address construction and operating costs. As discussed in Appendix E, “Lake Tahoe Golf Course Economic

Feasibility Analysis,” to the draft EIR/EIS/EIS, operating expenses decrease slightly under Scenario 1B (Alternative 2) compared to existing expenses primarily because of the decreased acreage of maintained landscape and power costs for irrigation. See Master Response Section 3.7, “Economics,” for a discussion of CEQA, NEPA, and TRPA requirements for analysis and a discussion of project funding.

- I64-21 The commenters have concerns about impacts on fens and brook trout. The fen and the “underground stream” with brook trout are outside the project area. See Master Response Section 3.3, “Biological Resources,” and response to comment I64-5 above.
- I64-22 The commenters believe that the EIR/EIS/EIS should evaluate habitat loss related to the Angora Fire. See response to comment I54-1 for a discussion of the Angora Fire. In addition, the commenters question the legality of land trade. See Master Response Section 3.2, “Land Use,” for a discussion of land trade.
- I64-23 The commenters question the adequacy of the economic analysis. See Master Response Section 3.7, “Economics.”
- I64-24 The commenters question project funding. See Master Response Section 3.7, “Economics.”
- I64-25 The commenters state that projections for the overall decline of golf; the greater cost for building a course on hilly, steep land; greater maintenance costs; and a declining economy are not factored into the financial analysis. See responses to comments I64-20, I64-23, and I64-24.
- I64-26 The commenters state that shutting down golf operations for 1 or 2 years would reduce money flowing into the economy and cause current golf course employees to be unemployed. The commenters believe that if the costs were projected into overall profits and losses for Lake Valley SRA, a 9-hole or executive 18-hole golf course would be competitive from a financial standpoint. As described in Chapter 2, “Project Alternatives,” in the draft EIR/EIS/EIS, and Chapter 2, “Project Description,” of this final EIR/EIS/EIS, the construction period for Alternative 2 would be extended by 1 year in an attempt to keep at least 9 golf course holes at the Lake Tahoe Golf Course open during all construction years. If this is not possible, the golf course would be closed for 1 year and would be reduced to a 9-hole golf course for 2 years. Under Alternative 3, the golf course would be completely closed for 1 year and would be reduced to 9 holes for 1 year. Therefore, short-term economic impacts of both alternatives would be the similar. A short-term loss in golf course-related jobs would occur under either of these alternatives; however, construction-related jobs would increase during this period, resulting in a beneficial effect on the economy. Therefore, construction of a 9-hole or 18-hole executive golf course would have similar short-term economic effects as a reconfigured 18-hole course, but would have greater long-term economic effects.
- I64-27 The commenters question the adequacy of the economic analysis. See Master Response Section 3.7, “Economics.”
- I64-28 The commenters question whether the economic analysis takes into account the decline in golfing and demographic changes of the area when considering revenue. The demographics of South Lake Tahoe are discussed in Section 3.15, “Population and Housing, Socioeconomics, and Environmental Justice,” of the draft EIR/EIS/EIS. Appendix E, “Lake Tahoe Golf Course Economic Feasibility Analysis,” to the draft EIR/EIS/EIS acknowledges that the Lake Tahoe Golf Course has experienced declining

gross revenues since 1997. Although the decline is not directly attributed to demographic changes, Appendix E states that the population and growth potential (demographic trends) of market areas are major factors considered in feasibility studies for golf courses. Therefore, general demographic trends were considered in the economic analysis. See Master Response Section 3.7, “Economics,” for a discussion of the assumptions used in the economic analysis for the project.

- I64-29 The commenters note that golf course closures have increased in the last year. The commenters express concern that the cost of the project could become a burden to the State and taxpayers. See Master Response Section 3.7, “Economics.”
- I64-30 The commenters correctly state that the Lake Tahoe Golf Course is not the fifth highest revenue producer for State Parks. As noted in Appendix E, “Lake Tahoe Golf Course Economic Feasibility Analysis,” to the draft EIR/EIS/EIS, the revenue from operations of the Lake Tahoe Golf Course is the fifth largest source of *concession* revenue in the State Parks system.
- I64-31 The commenters state that the numbers in brochures are unsubstantiated. Brochures prepared for the project are unrelated to the draft EIR/EIS/EIS and therefore are out of the scope for the response to comments; however the numbers used in the brochure were derived from the economic report, appenXXXX. The commenters also question the revenue estimated to be contributed to the local economy. See Master Response Section 3.7, “Economics,” for a discussion of the adequacy of the economic analysis.
- I64-32 The commenters have concerns about the cost of chemical and diesel spills. As discussed in Impact 3.14-1, “Use of Hazardous Materials,” in Section 3.14, “Human Health and Risk of Upset,” of the draft EIR/EIS/EIS, “hazardous materials at the site would [continue to] be in compliance with Federal, State, and local regulations, including existing orders.” If necessary, State Parks and its concessionaire would work with the Lahontan RWQCB to update the golf course’s chemical application and management plan as needed to update permit requirements for golf course operations. For clarification, the diesel spill was related to snowmobile use at the driving range, which would not change from existing conditions. Furthermore, under the recommended Preferred Alternative there would be less golf course directly adjacent to the Upper Truckee River, not more (see response to comment AOB8-7)
- I64-33 The commenters have concerns about impacts on cultural resources. See Master Response Section 3.6, “Cultural Resources.”
- I64-34 The commenters state an opinion about the feasibility of other alternatives besides Alternative 2. See response to comment AOB8-1 for a discussion of the alternatives evaluation.
- I64-35 The commenters’ support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Upper Truckee River Restoration & Golf Course Reconfiguration EIS Co**

I65

Carlfair@aol.com [Carlfair@aol.com]

**Sent:** Tuesday, October 05, 2010 12:06 PM

**To:** Project, Upper Truckee

**Cc:** seana@streamlineimpact.com; kkuntz@taohedailytribune.com; strain@fccc.edu; bgorman@tahoechamber.org

I have reviewed the draft of the Environmental Impact Study as well other information put out by the project staff over the past few years on the proposed California State Parks project on the Upper Truckee River, near Lake Tahoe Golf Course. I am writing to urge you listen to the quiet majority, of which I am one. Many of us support the project alternative that is going to be best for the river, the lake and preserving local jobs, which I believe is #2. You may not hear from many of the supporters but I imagine you will hear from many of those against it.

Not only am I a Tahoe Paradise resident and business owner, I am also an avid golfer. I think that Alternative 2 is the best way to improve Lake Tahoe Golf Course---and I mean improve, not expand it. I realize that lots of time and resources went into hearing what the community had to say and into the hiring of experts to provide the best alternatives for the project. I really like what we have come up with today for Alternative 2: moving 9 holes across the river. It is a great solution. Although we lose 9 flat river holes, we will have the opportunity to enjoy 9 new interesting links style holes with elevation in the pines. We get to keep 18 holes of golf, the river gets the opportunity to return to its natural state and this means trout and wildlife will have a healthier place to live. What is not to like about that?

In closing, we must take into consideration that we are in economically challenging times and I don't think we can make a decision on this project without acknowledging such an important fact. Lake Tahoe Golf Course provides over 200 jobs directly and indirectly through other related services. We need to make sure that our decision does not jeopardize these local employment opportunities. As I drive past Lake Tahoe Golf Course several times a day, I am always excited to see a packed parking lot with happy golfers knowing they might stop to eat in Meyers or continue onto the restaurants at the "Y" or beyond.

Clearly Alternative 2 is a way for us to fix the erosion going into the river and the lake, improve the golf course and keep jobs, a pretty logical decision to me.

Carl Fair  
Meyers Station  
3141 Highway 50 Ste D  
South Lake Tahoe, CA 96150  
530-573-4621  
[carlfair@aol.com](mailto:carlfair@aol.com)

I65-1

I65-1

The commenter's support for Alternative 2 and its environmental and economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

November 15, 2010

Cyndie Walck  
 CA State Parks and Recreation, Sierra District  
 PO Box 16  
 Tahoe City, CA 96145

Dear Cyndie Walck,

I'm writing to oppose the project of a golf course development in the Washoe Meadows State Park. In particular, **I strongly oppose Alternative 2 and urge the State Parks System, TRPA, and the Bureau of Reclamation to choose Alternative 3, which would allow Washoe Meadows State Park to remain an intact viable ecosystem, wildlife habitat, and recreational resource for the community and visitors to Lake Tahoe.** Of course, I would also urge the State Parks System, TRPA, and the Bureau of Reclamation to choose Alternative 5, which would decommission the Golf Course altogether.

I66-1

The reasons for opposing Alternative 2 are based on solid arguments. One such argument appeals to the water use. The golf course requires water sources for irrigation and facilities. The golf course is already using water diverted from the Upper Truckee River. A new well has already been drilled and could harm the river and meadow ecosystems in the Park including fish habitat and its unusual fens. Alternative 3 will restore the Upper Truckee River without impacting large areas of current park land, whereas Alternative 2 will have a large impact on a significant amount of raw land and will increase the golf course footprint. Increasing the size of the golf course from 133 acres to 156 acres will increase the water usage, which is really concerning in drought times.

I66-2

Similarly, Alternative 3 will help the Upper Truckee River. This river supplies approximately 40% of the water flowing into Lake Tahoe. Alternative 2 will facilitate the restoration to reduce erosion, fine sediment and nutrients into the Upper Truckee River and Lake Tahoe. Alternative 2, in contrast, will have a detrimental environmental impact by turning raw undeveloped forested land into a developed golf course and by increasing the size of the golf course from 133 acres to 156 acres. These impacts include effects on water quality, soils, vegetation, recreation, wildlife and cultural resources.

I66-3

I've been enjoying the Tahoe area for many years now and my children (10 and 8 years old, respectively) are growing up enjoying the area and learning about the need to protect nature. When I mentioned the golf course project to them they thought it was not possible. There was no way that the California Department of State Parks and Recreation could move some of the holes of the golf course to the Washoe Meadows State Park. They thought the job of the California Department of State Parks was to protect nature.

Thank you very much for considering my letter and the future of the Washoe Meadows State Park and Lake Tahoe.

Sincerely,

A handwritten signature in cursive script that reads "Emilio Ferrer".

Emilio Ferrer, Ph.D.  
835 N. Campus Way  
Davis, CA 95616



- I66-1                    The commenter’s support for Alternative 5 and opposition to Alternative 2 is noted.
- I66-2                    The commenter has concerns about the golf course’s water use under Alternative 2. See Master Response Section 3.4, “Hydrology, Flooding, Geomorphology, and Water Quality.”
- I66-3                    The commenter has concerns about relocating the golf course into undeveloped land. See response to comment AOB4-5 for a discussion of the considerations in selecting the location of the reconfigured golf course. See response to comment AOB8-6 for a discussion of the quarries.

## Lake Tahoe Golf Course

Chick Fraunfelter [tahoerealtorchick@gmail.com]

Sent: Thursday, October 20, 2010 6:20 PM

To: Project, Upper Truckee

I67

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### Genesis of the Lake...

Years ago our Legislators created the TRPA...and this was Good. The TRPA created the "Code" that was written to contain a hidden message: "You don't need a Costco, Walmart, Home Depot, Target, Best Buy, or any large Retail store in the Basin"...and the People listened and decided to drive their cars and trucks over the mountains and spend their money out of the communities. Jobs were lost, People sold their homes, and so much tax revenue left the communities that infrastructure declined and local governments were on the verge of insolvency.

The TRPA then created the BMP program to save the clarity of the lake... and this was Good. The People were given a timeline in which to comply with paved driveways and water runoff or face the wrath. Some did, many didn't. There was no wrath, just lack of enforcement. Thousands of vehicles continued to spread dirt and dust on the highways and byways as the People drove back and forth from the Basin to the "Shopping Zone" in NV. An article on the Clarity of the Lake proclaimed this road dust as a probable "major" culprit of the declining lake clarity. And the TRPA did nothing...and this was disappointing.

The CA Parks Department stepped forward to save the clarity of the lake with a proposal to tear up the local golf course and spend millions of dollars on a project that is hypothetical to say the least in its anticipated results. Why not just tell the People "You don't need a golf course." People can drive out of the Basin to play golf, then jobs will leave the area, and the revenue will follow the People.

Who is playing God in all of this? Is there anyone making decisions based on economics and some common sense? How have we allowed a handful of non-elected agencies and their small-numbered staff treat the People of the Basin like children? A time is coming when the Majority of the People will rise up and be heard...and it will be Good.

Chick Fraunfelter (530) 363-0065

One of the People

I67-1

I67-1

The commenter discusses information unrelated to the project or the draft EIR/EIS/EIS. The commenter requests consideration of economics in decision making. See Master Response Section 3.7, "Economics," for a discussion of the considerations of the project related to economics. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



John Garofalos [summerjohn@sbcglobal.net]

**Sent:** Monday, October 18, 2010 1:23 PM

**To:** Project, Upper Truckee

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Yes I'd like to comment on the proposed State Park Plan. I feel as if of all 5 plans only one option helps the most people with their recreational wishes. That option is # 2. Now personally option 2 works well for me due to the fact it includes a bridge over the river that does not confine the river. It also address the legal issues around the public access to the trails and bridge. For the rest of the community and visiting public option 2 allows for the continuation of the long established and profitable golf coarse. It keeps the jobs of those who work there and it brings in business to the area. The bridge allows for year round reaction which is not currently available due to the gates the golf company places on the bridges it has now every winter.

I'm an avid mountain bike rider and with the bridge I can access trails that pass through the park to even more trails. If you were to decide on a plan that does not include a bridge I would be quit disappointed. No one on one side of the river would ever be able to get to the other without going through the river or to a distant bridge to get over it. All the bridges in the area are car bridges.

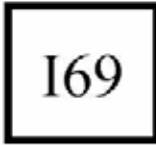
So for the vast majority of locals and visitors alike I implore you to vote for option 2!

John Garofalos  
1129 Apache Ave.  
South Lake Tahoe  
Ca 96150

I68-1

I68-1

The commenter's support for Alternative 2 and its recreation value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Comment**

Marcia Gaudet [m\_gaudet@sbcglobal.net]

**Sent:** Tuesday, November 02, 2010 10:27 AM

**To:** Project, Upper Truckee

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Regarding the river restoration presentation, I support alt. # 2 . The restoration project was well presented and fact based and the reconfigured 18 hole golf course is a fair and reasonable solution. I realize this will be expensive. When this project is completed will locals of modest means like me still be able to play this golf course or will it be for wealthy visitors only?

169-1

Sincerely,

Jerry and Marcia Gaudet  
1928 Bakersfield St.  
So. Lake Tahoe, CA 96150

530-577-1857

I69-1

The commenters' support for Alternative 2 and its economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Washoe Meadows golf course development**

Glass, Jeff [glass@visa.com]

**Sent:** Friday, November 12, 2010 3:09 PM

**To:** Project, Upper Truckee

I70

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As a resident who lives nearby Washoe meadows, I beg you not to extend the golf course into the meadow. Destroying this habitat for the sake of golf is unacceptable. Although I have enjoyed walking in the meadows for many years, since the fire it's the only nearby option. Not only that it's an important wildlife corridor and water shed.

I70-1

Please do not destroy this park for the sake of money.



I70-1

The commenter has concerns about impacts of reconfiguring the golf course on wildlife habitat. See Master Response Section 3.3, “Biological Resources,” for a discussion of wildlife habitat and corridors.

I71

In a message dated 9/11/2010 2:58:56 P.M. Pacific Daylight Time, zankiegooding@aol.com writes:

Hi Ron, Thanks for all of your E-Mails to keep us all aware of whats happening with the tournaments and most importantly with the possible future of the Golf Course itself. I have been unsuccessful with using the computer to give my thoughts on the matter to the powers of the future of the Golf Course. So I will share them with You. I do not believe the Golf Course in relationship to the River has any impact to the ultimate Clarity and pollution via sediment. Whether They take the course out all together it won't make any difference to the future of Lake Tahoe. It will be a Tremendous Loss of a Beautiful Golf Course and to All those that would have enjoyed it's presence and experience. NO PROJECT AND DO NOTHING would be a fantastic choice. But of course this isn't the way of Modern Man these days. Alas I will be saddened by the loss or reconfiguration of My Beloved Lake Tahoe Golf Course  
Sincerely, Your Fellow Golfer, John Gooding

I71-1

Letter  
I71  
Response

John Gooding  
September 11, 2010

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I71-1

The commenter's support for Alternative 1 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Upper Truckee River Restoration & Golf Course  
Reconfiguration Project**

zankiegooding@aol.com [zankiegooding@aol.com]

**Sent:** Saturday, October 23, 2010 2:59 PM**To:** Project, Upper Truckee

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California State Parks, My name is John Gooding, I have been a resident of Lake Tahoe for 36 Years and have played golf at Lake Tahoe Golf Course for the first time in 1971 and hundreds of times since then. It is a wonderful venue. My comment on this project is #1, NO PROJECT/DO NOTHING. Everyone is happy and enjoying the area as it is, except Hydrologist Cyndie Walck and others who would have us believe that previous man made disturbances are the cause of sediment erosion and the loss of 30% clarity to Lake Tahoe. RIVERS are Dynamic and it is their Nature to erode and transport materials downstream with them. If Alternatives #2, #3 or #5 are chosen that would initiate more Man Made Disturbances to the River Channel and Floodplain Causing More Erosion in the Hope of Restoring the area to a Natural Condition. Can Man really control Mother Nature in an attempt to keep Things the Way they Are or the Way they Were? The River will naturally cause erosion for as long as it flows. Choose Alternative #1 and allow Mother Nature to take her own course. The Economic and Recreational Activities will not be Negatively Impacted. The other Alternatives are Speculative and no Guarantee to Restoring a Time and Place so many Years Ago. Sincerely, John Gooding, p.o. box 1461, Zephyr Cove, Nevada 89448 ph.# 775-450-6242 E-mail, zankiegooding @aol.com

172-1

I72-1

The commenter's support for Alternative 1 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Fwd: Get Involved--Submit a comment on draft EIS document for Upper Truckee River Restoration + Golf Course Reconfiguration Project**

zankiegooding@aol.com [zankiegooding@aol.com]

**Sent:** Friday, November 05, 2010 1:42 PM

**To:** Project, Upper Truckee

-----Original Message-----

From: zankiegooding <zankiegooding@aol.com>

To: seana <seana@streamlineimpact.com>

Sent: Fri, Nov 5, 2010 1:34 pm

Subject: Re: Get Involved--Submit a comment on draft EIS document for Upper Truckee River Restoration + Golf Course Reconfiguration Project

Dear Seana, Here are my comments. Alternative 1 NO PROJECT/NO ACTION, This is the best choice at this time. Win-Win for everyone. The Parks Department continues to receive Revenue. The Golf Course continues to operate and thousands of golfers continue to enjoy playing one of the most Beautiful Courses in the country at reasonable rates. Other River and surrounding Park Visitors enjoy the area as it is, Beautiful.

Mother Nature and the River

will survive and thrive fine without Mans Interference. Alternative 2 RIVER RESTORATION & RECONFIGURATION OF GOLF COURSE. This choice appears to (FIX) everything. But in reality it is a GAMBLE. You will close the Golf Course for an indeterminable time to construct 9 new holes at somebodys great expense while losing Revenue. After it reopens you expect it to regain its revenue, when we have already seen what this has done to a local golf course (formally known as Sierra Nevada Golf Course. now Genoa Lakes Resort Course) It has lost almost all play and is in trouble financially due to Golfers not liking the New Course with changes. And you want to manually change the course of the River which means further disturbance of materials and potential massive new Erosion in hopes that the River will Overflow? and redeposit silt before entering the Lake. Perhaps The River is not Environment Enemy No. 1 and the development of the Tahoe Keys is the biggest problem for the Clarity of Lake Tahoe. All visitors to this area of the River are already Happy with the way things are, no need for further development of Bridges and/or Trails. Alternative 3 Worse alternative choice of all. You will lose anybody to operate a 9-hole course and will lose all Revenue generated by Golf. Alternative 4 If you feel compelled and Forced to have to do SOMETHING. This choice will satisfy all concerned with minimal costs and increased presevation of the Environment. Alternative 5 This choice is great if you are willing to give up all Golf generated revenue directly to the Parks Department and negatively impact the economy of South Lake Tahoe via Job losses and potential Millions Of Dollars fpr Local Businesses. Sincerely, John Gooding p.o. box 1461 zephyr cove nevada 89448 E-mail-- [zankiegooding@aol.com](mailto:zankiegooding@aol.com) Ph.#775-782-0068 Cell#775-450-6242

I73-1

-----Original Message-----

From: Seana Doherty <[seana@streamlineimpact.com](mailto:seana@streamlineimpact.com)>

To: Seana Doherty <[seana@streamlineimpact.com](mailto:seana@streamlineimpact.com)>

Sent: Wed, Oct 6, 2010 2:03 pm

Subject: Get Involved--Submit a comment on draft EIS document for Upper Truckee River Restoration + Golf Course Reconfiguration Project

Thank you to those who have already submitted comments! For those who have not yet, please do so by following the simple steps below (and thanks for forward this along to others):

**Be Part of the Process**

**Submit an EIS comment Today on the Upper Truckee River Restoration + Golf Course Reconfiguration Project**

**Easy Ways to Submit a Comment**

**By Email (preferred):** [utproject@parks.ca.gov](mailto:utproject@parks.ca.gov)

(include your contact info in body of email and include in subject line: Comment on Draft EIS for Upper Truckee River Project)

**By Mail:**

Cyndie Walck  
CA State Parks and Rec, Sierra District  
PO Box 16,  
Tahoe City, CA 96145

**Deadline: November 8**

**To review a copy of the draft EIS document including the Executive Summary, visit the project website: [www.restoreuppertruckee.net](http://www.restoreuppertruckee.net)**

**Suggestions for Writing EIS Comments:**

- 1) Keep it short (1 page)**
- 2) Make it personal—explain what you specifically like or do not like per the outlined Project Alternatives listed in the draft EIS document Executive Summary**
- 3) Refer as specifically as possible to the Draft EIS document if possible (page #)**

I73-1

The commenter's support for Alternative 1 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Upper Truckee project comments**

Kim Gorman [kimgorman@rocketmail.com]

**Sent:** Sunday, October 24, 2010 1:35 PM**To:** Project, Upper Truckee

Hi my name is Kim Gorman and I have been a resident of South Lake Tahoe for over 16 years. I have worked as an environmental scientist here for over ten years doing stream monitoring, stormwater monitoring and groundwater monitoring projects. I have also - more recently begun to work in the environmental education field with Explore Tahoe and the Lake Tahoe Community College. I am writing to you today to express my complete support for Alternative 2, for the Upper Truckee River Golf Course project. And would like to discuss why... After reading about the project in the environmental documents and discussing it further with many local residents my understanding of the project is that it will:

- o Restore the river to a functional state
- o Restore the streamside and meadow habitat
- o Reduce the amount of nutrients and sediment entering Lake Tahoe
- o Create a continuous wildlife corridor along the river
- o Preserve all sensitive plant and archaeological sites
- o Maintain quality golf recreation opportunities

Because of these reasons, it is both my professional and personal opinion that Alternative Two provides the greatest amount of good for our community. After working for many environmental agencies and witnessing our current economic state, the planned work is truly an excellent example of how we can evolve toward developing projects that serve multiple ends; the environment, the economy, and the recreational community.

In addition, Alternative 2 will:

- o Provide complete restoration of the river and surrounding meadow habitat
- o Improve lake clarity by reducing nutrients and sediment flowing into Lake Tahoe
- o Keep the only affordable, regulation size, 18-hole golf course in Lake Tahoe open by moving 9 holes to a currently available area outside the river flood plain
- o Contribute to the economy during a critical economic time; providing close to 200 jobs and needed revenue for California State Parks (\$880,000 per year). As well as adding \$6 million dollars to our local economy each year
- o Continue to provide many locals and tourists alike with high quality recreational opportunities

I urge you to please vote for Alternative Two – it is the only choice that makes sense for our community, the environment and our local economy!

Sincerely,

Kimberly Gorman -Environmental Scientist and Water Quality Specialist.

I74-1

I74-1

The commenter's support for Alternative 2 and its environmental and economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**FW: UT restoration - trails**

Walck, Cyndi

**Sent:** Tuesday, November 16, 2010 8:53 AM

**To:** Project, Upper Truckee

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**From:** Kim Gorman [mailto:kingorman@rocketmail.com]  
**Sent:** Monday, November 15, 2010 9:22 PM  
**To:** Walck, Cyndi  
**Subject:** UT restoration - trails

Dear Ms. Walck...

Because I feel the State Parks Upper Truckee River Project is an excellent benefit to the community, private business and the environment I wanted to provide a few comments on the trails section of the project.

With regards to Alternative 2 - which I think is by the far the best alternative for our entire community - I was wondering if it is at all possible to provide a larger buffer for public access around proposed holes 8 and 12. I think pleasing both the homeowners and non-golf recreational user can come fairly easy here. (There must be a give and take)

175-1

In addition, I would really like to see the upper Truckee bridge both open and safe for public access. This will be an important area for crossing the creek, and would help to alleviate user created crossing in the creek.

Under alternatives 2 and 3, there is a section of trail along the south side of the river that connects to HWY 50. Would it be possible to move this trail closer to the river while still protecting the integrity of the river bank? I think the reality is that users will walk off trail closer to the river bank - so if you could provide a creative solution to allowing for protected/stabilized river access, ie a boardwalk or something like that, then people will likely stay on trail better.

175-2

Besides that I think that this project has a lot of potential for helping the community reach multiple goals of water quality improvement, recreational benefit, and economic stability. We can't afford not to think of all three of these conditions. They are all vital to the well being of Lake Tahoe and its residents.  
Thank you for your time,  
Kim

- I75-1            The commenter’s support for Alternative 2 and its environmental, recreation, and economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS. See Master Response Section 3.5, “Recreation,” for a discussion of recreation trail access, the additional buffer that would be added, and trail safety.
- I75-2            The commenter suggests moving the recreation trails proposed under Alternatives 2 and 3 closer to the river. The suggestion is noted. See Master Response Section 3.5, “Recreation.”

**Tahoe Fishery**

Vern Griffith [griffs94571@yahoo.com]

**Sent:** Wednesday, November 03, 2010 3:41 PM

**To:** Project, Upper Truckee; ebaker@rri.org

I76

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I realize I'm almost too late, expressing my opinion on the above subject, but.....are  
golf courses and more housing and 'enrichment' of Tahoe beauty and aesthetics?

I may be late, and even in the minority when shoved up against the politicians and land  
developers of the Tahoe region, but..... I'm thinking of US progeny, being 'explained' to, that  
"this was once".....and probably wearing breathing apparatus?

Give the fish and our offspring a chance. Destroying the natural beauty and function of our  
living space isn't praiseworthy. CV Griffith

I76-1

I76-1

The commenter's support for maintaining the beauty and function of the area is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

## Comments on Upper Truckee River Restoration and Golf Course Reconfiguration Project

Greta Hambsch [tahoegreta@gmail.com]

**Sent:** Sunday, November 14, 2010 6:08 PM

**To:** Project, Upper Truckee

I77

We appreciate the opportunity to share our thoughts on the Upper Truckee River Restoration and Golf Course Reconfiguration Project. After reviewing and discussing together the five proposed alternatives, we are agreed that Alternative 2 is the best solution. We have based our decision on the following:

- 1.) Restoring the Upper Truckee River ecosystem will correct damage done by development to the meadow and river and most importantly reduce sediment flowing into Lake Tahoe;
- 2.) Failure to use available funds to make these needed improvements would be folly;
- 3.) Relocating golf course holes that border the river to higher capability land is cost effective and desirable;
- 4.) Reinvesting in the quality 18 hole golf course assures the continuation of a revenue source for California State Parks;
- 5.) Continuing the operation of the Lake Tahoe Golf Course benefits the local community by providing jobs and affordable golf for residents.

As 30 year residents at Lake Tahoe, we understand the importance of all efforts to maintain the water quality and clarity of Lake Tahoe. This project would reduce sediment flowing into the Lake and restore the riverbed and meadow ecosystems. We also recognize and appreciate the benefits of the Lake Tahoe Golf Course to our community. Through the years, we have participated in golf tournaments benefiting community organizations, and we have enjoyed special events in the club house. On a personal note, we have appreciated the incredible beauty of our mountains as we have enjoyed many rounds of golf with friends or our children.

**For these reasons, we hope you will approve and implement Alternative 2 for the Upper Truckee River Restoration and Golf Course Reconfiguration Project.**

Greta and Michael Hambsch  
116 Meadow Drive  
Stateline, Nevada 89449  
(775)588-7143  
[mph@tahoelawyers.com](mailto:mph@tahoelawyers.com) and [tahoegreta@gmail.com](mailto:tahoegreta@gmail.com)

I77-1

I77-1

The commenter's support for Alternative 2 and its environmental and economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



I78

**River-Golf Course EIR/EIS/EIS**

Diana Hamilton [diadorslt@yahoo.com]

**Sent:** Monday, November 15, 2010 4:41 PM

**To:** Project, Upper Truckee

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Cyndie Walck  
Sierra District  
Tahoe City, CA 96145

Dear Ms. Walck,

Having walked and snow shoe/skied, as well as golfed, in the Washoe Park area, we feel strongly that the golf course should stay on its current side of the river. 178-1

Yours,

Mr. & Mrs. Dory Smith

Diana Hamilton-Smith  
1171 O'Malley Drive  
South Lake Tahoe, CA 96150

I78-1

The commenter's support for keeping the golf course at its current location is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Washoe Meadows State Park Relocation**

Patti Handal [Beakface@att.net]

**Sent:** Monday, August 30, 2010 9:13 AM**To:** Project, Upper Truckee**Cc:** Washoe Meadows Community [HealeyJohnski=comcast.net@mcsv43.net]

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To Whom it May Concern:

As a 23-year resident of the south shore of Lake Tahoe, I felt very lucky and blessed when I purchased my house 20 years ago, which borders the Washoe Meadows State Park. But this is not only my home, but the home for many types of wildlife species. At present, we live in harmony.

To my delight, this summer on almost a daily basis, my yard is visited by a variety of birds, squirrels, occasionally a chipmunk, raccoons, coyotes and bears. Their path is always in and out of the state park property. Often when I walk through the park, I can see evidence of their presence.

There are no words to describe the great sadness I feel for what will be my loss as well as the wildlife's, all in the name of greed.

There is no valid reason to move the golf course to the other side of the river. In the meetings I attended and the emails that I have received, there have been alternatives suggested such as making an 18-hole course with the same footprint. A golf course architect verified this could be done with 2 proposed layouts. Moving the entire project to the old Sunset Ranch property adjacent to the airport was another viable suggestion.

While it is understood that currently the revenue from this project is what is desired, it is very short-sighted. Golf is on the decline along with the Baby Boomer Generation. This is not a parroted statement; even AARP has addressed this issue in regard to there not being a need to build more golf courses, which has precipitously declined over the past 15 years. The question then should be "what uses for the future will be viable for the present golf courses?"

But you are the ones in power. You choose not to listen or hear what the people have to say whose lives it impacts. Despite a near unanimous opposition from the homeowners bordering the State Park, you continue down the wrong path, your path. In the name of progress you are the destroyers of nature and wildlife, from which there will be no recovery in our lifetimes.

What labels shall be affixed to you?

I urge you to reconsider and do what is right for the wildlife and the people of the community, so please, just step out of the way.

The following pictures were taken on May 22, 2010. This bear has visited my house many times over the summer. There are 7 bears in total that I can identify; a mom and 2 cubs (yearlings), a single male ~2-years old, an adult cinnamon male, an adult chocolate male, and a black adult male. I have some photos and video clips of some of these aforementioned bears.

179-1

This is their home. I respect that. This is also my home. Can you respect us?



Sincerely,

Patricia M. Handal, D.V.M.

I79-1

The commenter's opposition to Alternative 2 is noted. The commenter has concerns about impacts on wildlife habitat and suggests other alternatives. See Master Response Section 3.3, "Biological Resources," for a discussion of impacts on wildlife habitat; see response to comment AOB8-1 for a discussion of alternatives considered but eliminated from further consideration.



**Golf Course**

Judith Hanson [judithmh@yahoo.com]

**Sent:** Friday, October 29, 2010 10:35 AM

**To:** Project, Upper Truckee

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The golf course should remain. Either reconfigure to retain the 18 holes or shore up the river to protect the environment. Do not remove the golf course entirely. This is a revenue source and a part of the community.

| 180-1

Regards,

Judith Hanson ,MBA  
Director, South Tahoe Board of Realtors  
e-PRO Certified, RSPS, SRES  
California Broker # 01475866  
Nevada Broker/Salesperson  
Chase International  
989 Tahoe Keys Blvd.  
South Lake Tahoe, CA 96150  
Direct: (530) 318-2710  
Office : (530) 544-2121  
Fax: (530) 548-7499  
[Judith@JudithHanson.com](mailto:Judith@JudithHanson.com)  
[www.JudithHanson.com](http://www.JudithHanson.com)

I80-1

The commenter's support for Alternative 2 or Alternative 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Public Comment on Upper Truckee Golf Course Project**

Paul Hardy [phardy@frit.org]

**Sent:** Monday, November 15, 2010 5:10 PM  
**To:** Project, Upper Truckee  
**Importance:** High

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Dear CA State Parks,

- It's wrong to move a golf course onto environmentally sensitive land within a state park.
- Alternative 2 will fragment the park and ruin wildlife habitat.
- Alternative 2 will nearly double the number of golf course fairways bordering the river.
- Alternative 2 will transform present habitat for diverse wildlife into a mono-culture.
- Golfing is in decline.
- In its present state, Washoe Meadows State Park provides year-round, low-impact, affordable recreation.
- Restore the river AND save the park from golf course development

181-1

My family and I have long enjoyed Washoe Meadows State Park and encourage **you to select Alternative 3 as the preferred alternative in the EIS/EIR.** We feel that Alternative 3 represents the best compromise between meaningful environmental restoration and economic vitality along the Upper Truckee.

Thank you,  
Paul Hardy

\*\*\*\*\*  
 Paul Hardy  
 P.O. Box 4276  
 Quincy, CA 95971  
 Phone: 530.283.5758  
 Fax: 530.283.5745  
[phardy@frit.org](mailto:phardy@frit.org)  
 \*\*\*\*\*



I81-1

The commenter's support for Alternative 3 and opposition to Alternative 2 is noted. Appendix E, "Lake Tahoe Golf Course Economic Feasibility Analysis," to the draft EIR/EIS/EIS acknowledges that the Lake Tahoe Golf Course has experienced declining gross revenues since 1997. The commenter summarizes opinions addressed in the responses to comment letter AOB31.

**Washoe Meadows**

goldseal@mcn.org [goldseal@mcn.org]

**Sent:** Monday, November 15, 2010 6:32 AM

**To:** Project, Upper Truckee

To whom it may concern;

My name is Angela Harney and I recreate in Tahoe several times a year, hiking, showshoeing are my preferred activities. One of my favorite spots is the Washoe Meadows area. It's extreme pristine beauty is a small jewel in the encroaching golf course.

I urge the decision makers to keep the area protected!

1. The draft EIR is inadequate because it states that the impact of Alternative 2 will have a "less than significant impact" on recreation. For park users, removing 60 acres on natural habitat to create a golf course will have a very significant and negative impact on recreation. The park will be fragmented, many trails to the river will be lost, the park will be surrounded by golf holes, and park users will actually have to cross the golf course or take trails around it to access the river.

182-1

2. The draft EIR states that Alternative 2 will have a "less than significant impact" on wildlife habitat.

182-2

Restoration of the river is desirable. However, Alternative 2 includes increasing the size of the golf course footprint and moves 9 fairways across the river into sensitive state park land. I support river restoration as outlined in alternative.3

I strongly oppose Alternative 2 and urge the State Parks System, TRPA, and the Bureau of Reclamation to choose Alternative 3, which would allow Washoe Meadows State Park to remain an intact viable ecosystem, wildlife habitat, and recreational resource for the community and visitors to Lake Tahoe

182-3

The removal of 60 acres of Lodgepole pine, Jeffrey Pine and the removal of 1,640 native trees larger than 10 inches in diameter will have a very significant and negative impact on wildlife habitats. Many upland animals will lose their habitat and be displaced. Remember the Angora fire and how wildlife activity increased in our neighborhoods? Once again, many of these animals will be displaced, wander into our neighborhoods, eventually cause property damage and be euthanized. Restore the river and protect Washoe Meadows State Park!

182-4

I urge the decision makers to keep the area protected!

Sincerely,  
Angela Harney  
PO Box 2833  
Fort Bragg, CA 95437  
707-964-6340  
goldseal@mcn.org

- I82-1            The commenter has concerns about recreation access. See Master Response Section 3.5, “Recreation.”
- I82-2            The commenter has concern about impacts on wildlife habitat under Alternative 2. See Master Response Section 3.3, “Biological Resources.”
- I82-3            The commenter’s support for Alternative 3 and opposition to Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.
- I82-4            The commenter has concerns about the impacts of Alternative 2 on wildlife habitat and seeks consideration of the effects of the Angora Fire. See Master Response Section 3.3, “Biological Resources.” See response to comment I54-1 for a discussion of the Angora Fire.



**Protect Washoe State Park**

Teri Harrigan [teriharrigan@gmail.com]

**Sent:** Monday, August 30, 2010 3:08 PM

**To:** Project, Upper Truckee

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To Whom it May Concern:

Please DO NOT move any part of the golf course into Washoe Meadow State Park, S. Lake Tahoe, CA. Not only would this be very irresponsible management by the park department (give away our tax dollars to big money), but is also a crime to the incredible environment and unique ecosystem supported by Washoe Meadows.

During our last walk through the meadows, my niece took incredible photos of different colored grasshoppers, tiny frogs, polliwogs, dragonflies, and various beautiful flowers. I will forward these on to you when she uploads them, in case you've not had the opportunity to observe this habitat first hand.

I find it difficult to comprehend how someone thinks they have the right to give away our (the tax-paying citizens of the state) park land.

Please find some other way to spend your time and energy.

Sincerely,  
Mrs. Teresa Harrigan  
733 Zuni  
S. Lake Tahoe, CA  
510-390-0244

183-1

I83-1                      The commenter has concerns about impacts of Alternative 2 on wildlife habitat. See Master Response Section 3.3, “Biological Resources.”

## Comment on Upper Truckee / Golf Course

Don Harriman [donh@netfeed.com]

**Sent:** Friday, November 12, 2010 11:42 AM

**To:** Project, Upper Truckee



Greetings,

My humble opinion favors project alternatives 3 or 5. The first 4 stated project goals essentially conflict with the 5th (maintain recreational and economic benefits), and in the context of the Lake Tahoe basin, I believe are the most important. I am puzzled as to why a golf course would exist in the State Park system at all. There are many places one can go to play golf, but not so many alpine lake environments.

184-1

Thank you,

Donald C. Harriman  
2535 Cold Creek Trail  
South Lake Tahoe, CA 96150

I84-1

The commenter's support for Alternative 3 or Alternative 5 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Upper Truckee River Restoration Project**

rx@surewest.net [rx@surewest.net]

**Sent:** Friday, September 17, 2010 4:57 AM

**To:** Project, Upper Truckee



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On the Upper Truckee River Restoration project

consider making it a 9 hole Golf Course with reduced play along with the River Ecosystem Restoration

there are plenty of other Golf Courses in the Tahoe area and numerous other recreation alternatives.

185-1

Roxene Harrison  
Roseville, Calif.



I85-1

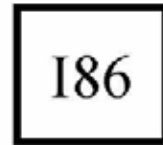
The commenter's support for Alternative 3 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Keep Washoe park as it is**

John Hartzell [tahoehartzell@yahoo.com]

**Sent:** Saturday, September 04, 2010 9:22 PM

**To:** Project, Upper Truckee



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Please leave Washoe Park as it is. I use it 3-4 times a week, hiking, running, snowshoeing and biking through it. The natural beauty of the park is stunning and it would be a shame to change it in any way. It is a place that I always take visitors to Tahoe to show them how pretty Tahoe is. Please do not change the park in any manner.

Sincerely,

John Hartzell

tahoehartzell@yahoo.com

I86-1

I86-1

The commenter's support for maintaining Washoe Meadows SP in its current state is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Leave the park as is for the public.**

John Hartzell [tahoehartzell@yahoo.com]

**Sent:** Saturday, October 23, 2010 11:00 AM

**To:** Project, Upper Truckee



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Please do not take away our park land as it exists today. We, the public, love to use the park and don't want a golf course where the park land currently is. The park is so beautiful right in our backyards and I take all my visitors to Tahoe to see it.

| 187-1

Please don't change our park!

John Hartzell

I87-1

The commenter's support for maintaining Washoe Meadows SP in its current state is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**FW: LTGC - Please Be Heard - State Park Alternatives for our Golf Course**

McMillan-Hanly, Elizabeth

I88

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**From:** Walck, Cyndi  
**Sent:** Thursday, August 26, 2010 11:10 AM  
**To:** 'Seana Doherty'; 'Tracy Owen Chapman'; kathy strain; McMillan-Hanly, Elizabeth  
**Subject:** FW: LTGC - Please Be Heard - State Park Alternatives for our Golf Course

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**From:** Doug Hazlett [mailto:hazlettdoug@gmail.com]  
**Sent:** Wednesday, August 25, 2010 12:29 PM  
**To:** Walck, Cyndi  
**Subject:** Fwd: LTGC - Please Be Heard - State Park Alternatives for our Golf Course

Hi:

We strongly believe in the attached message. We need to save our golf course. It is the only reasonably priced full length golf course in the area. We have friends that say they will move out South Lake Tahoe if the golf course is taken away from us. Mr. Rettus has stated our position very well. We strongly urge you to select alternative #2. It is the only alternative that will satisfy all parties.

I88-1

Respectfully,

Douglas & Joan Hazlett

----- Forwarded message -----

**From:** <RonCRettus@aol.com>  
**Date:** Tue, Aug 24, 2010 at 7:12 PM  
**Subject:** LTGC - Please Be Heard - State Park Alternatives for our Golf Course  
**To:** [RonCRettus@aol.com](mailto:RonCRettus@aol.com)

Lets be heard !!!!!!!!

I would ask each of you that receive this e-mail to take one of two actions:

If you agree with it - Forward it to [CWalck@parks.ca.gov](mailto:CWalck@parks.ca.gov) with an "I agree" comment.

If you have different opinions or/and can take the time to express your individual thoughts on **what** you would like to see happen and **why**, then send your own individual e-mail to Ms. Walk

**But we do have to be counted** - there are groups other than golfers that are actively lobbying the State Parks organization to take action that will do away with our course or reduce it to 9 holes.

I believe the California State Parks should adopt Alternative 2.

This would restore the Upper Truckee River, enhance the surrounding wetlands/animal habitat and reduce silt flowing into Lake Tahoe while keeping our 18 hole golf course by moving 9 holes to a currently available area outside the river flood plain.

1. This alternative would keep an affordable, tournament level, 18 hole golf course. Affordable because it would not be the \$200- \$250 fees charged by Edgewood, and Tournament level vs the playable but "reduced level" of Tahoe Paradise executive type course.

2. The proposed new area (outside the flood plain) for the new 9 holes looks like a blight area today and our Lake Tahoe environment and ambience would be enhanced and improved with the movement of the new holes to this area.

3. Reducing our golf course to 9 holes or removing the course entirely will deprive us of a major recreation opportunity currently provided by our California State Parks. This is extremely biased against the many local golfers that live in the South Tahoe area.

4. Visiting golfers and Tournaments will not come to a golf destination vacation area for a 9 hole golf course.

The impact to our already fragile local economy would be negatively impacted by as much as \$6 - \$9 million dollars each year.

25,000 rounds a year - Between late April and early October

60% of these rounds from visitors at 1 round per visitor

15,000 visitors at 2 nights motel stay (\$150) = 2.25 million dollars

15,000 visitors at 5 meals (\$40) = 3.0 million dollars

Add 25 % for those who bring their families: 1.2 million dollars

Revenues Potentially Lost to our local economy: 6.5 million

This does not include revenues to the golf course or California State Parks and Income to the 50-75 local people employed by the course

5. Remember, our opinion (vote) is very important - The thousands of our visitors are removed from the issues and in most cases don't know what the current plans for the course could be.

6. If you are aware of visiting golfers, please forward this email to them.

**Please take the time to be heard - If not Us then who?**

I88-1

The commenters' support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**river restoration & golf course project**

Doug Hazlett [hazlettdoug@gmail.com]

**Sent:** Wednesday, September 08, 2010 3:43 PM

**To:** Project, Upper Truckee

189

As I see it, the State wants to spend a lot of money to improve the clarity of the water flowing into the Lake, from the Upper Truckee River. I, personally, feel that the proposal to put rocks along the banks of the River in the areas where the improvement is needed most, is the best solution. That would leave money, left over for other necessary projects and spare our beautiful golf course.

There are many others that share this belief that are afraid to speak out. They know that I am a affiliate of the golf course and ask me regularly, what's going on. Most will tell you that they support porposal #2, because they think that 's the solution that the State wants and that it is better than a 9 hole course or no course.

That's my opinion.

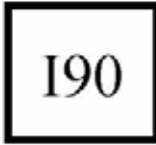
Respectfully,

Douglas L. Hazlett

189-1

I89-1

The commenter's support for Alternative 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**Lake Tahoe Golf Course**

Doug Hazlett [hazlettdoug@gmail.com]

**Sent:** Wednesday, September 22, 2010 10:11 PM

**To:** Project, Upper Truckee

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Hi:

My first support is for 'rip rapping' the river. The added money that would be used, on resolution #2, would be better used in other locations in the State Park system. The golf course is a real money maker for the State Park system. Everyone wins with this solution including the opposition who doesn;t want the new holes in thier neighborhood.

190-1

Respectfully,

Douglas L. Hazlett,  
Joan M. Hazlett,  
Norman & Lulu Green,  
Brent Richard, Jami lockhart,  
Joseph A. Lukacs

I90-1

The commenter's support for Alternative 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**From:** Ann Marie Henriouille [mailto:ahenriouille@mailstation.com]  
**Sent:** Sat 9/11/2010 4:41 AM  
**To:** Project, Upper Truckee; torourke@cityofslt.us  
**Subject:** Upper Truckee Project-Planes, Trains, Keys & flood liability

Ms. C. Waick; forward copy to Cynthia Coleman, Lester Snow, please:

This UT discussion is akin to giving pedicure to stomach cancer patient. Biggest insult to Lake Tahoe is the infamous Keys development, situated atop what we old ones used to call the "Truckee River Marsh" (wetlands) ... So now we patch?

Millions spent on Upper truckee would be better used to leverage railway access to Lake Tahoe Basin. Initial step, rebuild Tahoe City Rail link, moving Transit center to 64 acre tract and include sobust waterborne transit linking North to South Shore Stateline. Snow season would include added schedules to Ski Run, in Summer, Camp Rich schedules are added. Toll road section Camp Rich/Meeks Bay is appropriate cash contibutor for Tahoe Transport and Water Quality jobs! Maybe SLT Airport-Camp Rich Light Rail for year-round ferry schedules? Strategic realities demand airport in Tahoe through this century...

As the ferry service (See vessel "Peralta" on the Alameda/SF Ferry run on the Bay) grows numbers, proceed with the 50 Corridor Rail element as scoped in the 1995 CalTran I-80/US50 Reno/Tahoe Rail Stuey (Unabridged). CalTrans drops 50 corridor rail component in recent access studies, even as Middle East convulses. -Cognitive dissonance-

Hopefully your project managers are doing responsible modeling on flood damage potential with the meander features proposed. Slow water runs deep... Above said, let us bring in an overarching fact: As cheap & plentiful oil slips into memory, the railway component once again becomes crucial for maintaining commercial viability at Lake Tahoe. As you will undoubtedly have these inputs in mind as the process moves along, duly noted in the record, it is time to broaden the discussion. To Wit.

Situational Awareness demands all hands get savvy on the oil depletion phenomenon ASAP. Leadership at Tahoe has the opportunity even at this late hour to do transport engineering of National Policy level significance. Intense familiarization with energy emergency details includes look at Richard Heinberg's "Museletter 220", see at Heinberg's home page. Print Chris Skrebowski's updated Peaking Oil paper, download from (peakoilconsultants.com).

ALL Tahoe officials (and by extension the public they serve) benefit by earliest familiarity with the threat to transport & commerce presented by motor fuel limits. Tahoe clarity was purported to be Job #1 by the League To Save lake Tahoe, but they failed to reinstate Tahoe rail access even as they stopped the Emerald Bay bridge project. Laurel Ames was a League rail proponent, but Rochelle Nason lacked nerve & skill to keep on with rail advocacy. ("Politics" sez she during one of the winter road closures) Authorities such as Dr. Lewis Goldman (Secchi Dish) mentioned need for electric railway access as early as 1972. Meanwhile, travelers continue to play "Rock Roulette" on Echo Pass, adventures in Happy Motoring.....

What's past is done. Now, before Iran action or other initiator of Federal Executive Emergency Orders for motor fuel rationing, all hands responsible for Tahoe planning MUST get up to speed on the energy component in setting project priorities at Lake Tahoe.

Parties seeing this are requested to share contents as appropriate in their respective purviews. "There is wisdom in the counsel of many".

Thank You.

Gunnar Henriouille (530-346-6060)  
 Lake Tahoe constituent since 1971

191-1

I91-1

The commenter's opposition to all Truckee River projects is noted. The commenter suggests spending money on transportation projects. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**From:** Ann Marie Henriouille [mailto:ahenriouille@mailstation.com]  
**Sent:** Fri 10/22/2010 9:45 PM  
**To:** seana@streamlineimpact.com; Walck, Cyndi; jregan@trpa.org  
**Subject:** Please Attend Upper Truckee River Project on TRPA Agenda

October 23, 2010

Dear Project Partners- (please route)

Lake Tahoe EIP Program  
 TRPA  
 U.S. Dept of the Interior  
 Bureau of Reclamation  
 California Tahoe  
 Conservancy

On TRPA Governing Board Agenda

-Your Input Needed-

Hello all:

Is anyone asking effects on airport operation in flood period? Murphy's law says water on runway during regional disaster (Reno airport closed, 50 closed account avalanche, etc.) is to be avoided.

The various agencies on this case have a larger problem coming; several responsible government bureaus (USDOE; USDOT; CIA and various private think tanks) are warning of motor fuel limits mid-decade or sooner with Middle East (Iran/Israel) meltdown.

By all means, proceed with projects to preserve Lake Tahoe water quality... Unfortunately, economy not government is the ultimate funding agent, and gas rationing will hit environmental repair a death blow. Is there any way to say it more clearly? The TRPA and agencies in their loop must collectively assume due diligence investigation of the oilwell depletion element and Peaking Oil ramifications.

Federal Executive Emergency Orders for motor fuel rationing will come as worldwide demand, devalued dollar, or oil lane war (singly or combination) restrict US oil import flow. That's the way it is, and authoritative sources say it is just a matter of time.

Lake Tahoe visitor access is THE key element to maintain political and actual in-basin spending. Rationing without alternative means of travel to-around-from Lake Tahoe closes the doors of the government agencies listed above. See Richard Heinberg's papers on the Energy Emergency, see Heinberg's "Museletter" series. Beginning with Spring 2008 see the run-up to the Summer 2008 oil price surge, a supply/demand crisis not only speculation.

Worldwide recession and oil is again on the upward march? Anyone reading this smell a repeat of summer 2008? Hope the agencies reading this have intellectual capacity to multitask; the Tahoe City Rail branch is the single best early guarantor of the Lake Tahoe economy and the multitude of good works hinging on visitor access. See 1995 Reno/Tahoe rail/waterborne service scopings...

I92-1

I92-1

The commenter raises a concern about potential flooding effects on the South Lake Tahoe Airport. The airport is approximately 0.6 mile (~3,000 feet) down valley from the portion of the Upper Truckee River adjacent to the golf course. (This distance is a straight line along the river corridor, not total river distance; however, valley distance would be relevant for flooding.) Section 3.3, "Hydrology and Flooding," of the draft EIR/EIS/EIS presents a thorough analysis of the existing and potential flooding effects of all alternatives. The impact analysis for flooding (Impacts 3.3-3 and 3.3-4) is based on hydraulic modeling that accurately depicts the capacity for flood flow conveyance of the downstream U.S. 50 bridge. The bridge limits the maximum flow rate released downstream during flood events of about 10-year or greater magnitude. The flow constriction by the U.S. 50 bridge would not be modified by any project alternative, and no adverse changes to the worst-case flooding scenario would occur downstream of the U.S. 50 crossing.



November 3, 2010

To: utproject@parks.ca.gov  
River-Golf Course EIR/EIS/EIS

From: Alan Heyvaert, Ph.D.  
PO Box 1815  
Crystal Bay, NV 89402

**RE: Public Comment on Upper Truckee River Restoration and Golf Course Reconfiguration Project**

Restoration of the Upper Truckee River should be one of the highest priorities for environmental improvement in the Tahoe Basin to help restore the clarity and water quality of Lake Tahoe. It has been documented from scientific studies for the Lake Tahoe Total Maximum Daily Load Technical Report (June, 2009) that the Upper Truckee River is the single largest contributor of nutrients and fine sediments into Lake Tahoe. Much of this results from channel erosion and diminished ecological functions due to long-term effects from historic land disturbance and contemporary urbanization.

Most natural, undisturbed, streams and rivers exist in states of dynamic equilibrium that exhibit relatively high channel stability and low bank erosion rates, compared to disturbed conditions. The Upper Truckee River delivers about 25% of the total stream discharge into Lake Tahoe. It has experienced numerous and significant perturbations since the mid 1800s, including logging, urbanization, rechannelization, loss of natural wetlands, and bank revetments. All of these factors have conspired against the natural processes of stream channel evolution that would normally lead toward a new dynamic equilibrium through a progression of adjustments in sinuosity, profile, and cross-section.

The Upper Truckee River Restoration and Golf Course Reconfiguration Project represents one of the few existing opportunities to substantially restore natural dynamic processes that should help reduce nutrient and fine sediment loadings into Lake Tahoe. Several options are presented. Of these, the main objective should be to reintroduce meanders consistent with historic profiles and with the current hydrodynamic energy regime of this river, such that overbanking will occur at high flows within the riparian corridor and adjacent stream environment zones (SEZ). Considering this objective, the alternatives 2, 3 and 5 presented in the draft EIR/EIS would implement these functions, while alternatives 1 and 4 would not. Any use or restoration of degraded landscapes (as with the old borrow pits in alternative 2) is to be commended, as well as efforts to remove or reduce human land use activities in the riparian corridor, to the extent practical.

I hope that all stakeholders can come to an agreement that will allow this restoration and reconfiguration project to proceed.

193-1

I93-1

The commenter's support for Alternatives 2, 3, and 5 and opposition to Alternatives 1 and 4 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Alternative 2**

Larry Hobson [l\_ghobson@yahoo.com]

**Sent:** Friday, October 15, 2010 10:02 AM**To:** Project, Upper Truckee

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October 15, 2010

Larry and Gail Hobson  
2668 Divot Court  
South Lake Tahoe, Ca. 96150

Dear Upper Truckee River Restoration,

We totally support "Alternative 2". After listening to Cindy explaining that 4 may not do the job.

I buy a Season Pass and play about 40 times a year. I take my grand kids and great grand kids out to play. They also take golf lessons each year.

I play with tourists about half of my rounds each year and they all say they come to Tahoe to play golf.

I just don't believe they will come for NINE holes of golf. I know I would not and I live on hole Five.

During the winter many of us use the golf course for Cross Country Skiing and Snow Shoeing.

In my seven years of playing golf here I have never seen a Horse or a Hiker come of the woods.

I hope the State goes for Alternative 2. I would also like to see Management that was a little more into wanting a growing men's and women's club.

Thanks for listening.

Larry and Gail Hobson

I94-1

I94-1

The commenters' support for Alternative 2 and suggestion for additional support of the men's and women's club are noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Comments on Upper Truckee Restoration Project**

JTAHOEFER@aol.com [JTAHOEFER@aol.com]

**Sent:** Tuesday, October 26, 2010 9:18 AM**To:** Project, Upper Truckee

I believe preference must be given to Alternative 5, which restores most of the State Park area for its ecological functions, especially that of the Truckee River water course. Retention of the Building and Parking for public use is acceptable, if the building can be operated without it being an economic liability to the State. Though this alternative unfortunately would remove the golf course, which is indicated as a monetary contributor to the total operation of the State Parks System, this should not be a deciding factor. What must prevail is the goal of restoring Lake Tahoe clarity and other environmental thresholds established by the TRPA for the Lake Tahoe region. This goal seems best served by restoring most of the State land area to a natural ecosystem of forest, meadow and river.

Alternative 3 may be a reasonable Alternative to pursue as well. Although it does not achieve the extensive ecological benefits of Alternative 5, it does retain a valuable recreation resource for golfers. Though not as desirable as a full 18 hole course, at least this segment of the recreation public would not be deprived of a readily available area in which to enjoy golfing. However, if an Executive course, or a 9 hole course would not provide sufficient financial return to a concessionaire so as to fully support the operation, then this alternative cannot be considered. With the State Park system currently in a deplorable condition and not adequately funded by State tax revenues, then the added burden of partially subsidizing the golf course operation and maintenance is unacceptable.

Thank you for the opportunity to provide comment.

Jon Hoefler

1060 Lamor Court  
South Lake Tahoe, CA96150  
(530) 577-5922

195-1

I95-1

The commenter's primary support for Alternative 5 followed by support for Alternative 3 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**I Support Alternative 2 for the Upper Truckee**

Kirk Hopkin [kkh195@gmail.com]

**Sent:** Monday, October 18, 2010 4:31 PM

**To:** Project, Upper Truckee

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I strongly urge that the Department of Parks and Recreation choose Alternative 2 for the Upper Truckee River Restoration & Golf Course Reconfiguration Project.

The continued deterioration of the Upper Truckee cannot continue. Its health is vital to habitat, fish and Lake Tahoe.

By moving part of the golf course away from the river, Alternative 2 will arrest this deterioration. Its a lasting solution that will benefit the river, its fish and fishing, while preserving the 18-hole golf course for all to enjoy.

Kirk Hopkin

I96-1

I96-1

The commenter's support for Alternative 2 is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.



**River-Golf Course EIR/EIS/EIS**

Rick Hordin [ptmanyoda@yahoo.com]

**Sent:** Wednesday, November 03, 2010 10:36 PM**To:** Project, Upper Truckee

It is outrageous that most folks in the Tahoe Basin - a large percentage of which has little to no impact on the local watershed - cannot put up a garage on their own property due to 'coverage restrictions'. Meanwhile a fertilizer-ridden algae-creating, lake 'eutrophicating' golf course is proposed to be expanded on the same watershed's main tributary!

Putting up a garage = '0' effect on lake clarity. Golf course = off the scale.

Let's not forget the Upper Truckee flows straight out the the Lake now. The Tahoe Keys have eliminated the pollution-filtering effect the marsh (that naturally existed there) performed (that helped maintain Lake Tahoe's once-lauded clarity). And the Keys already dump an ocean-liner-sized boatload of fertilizer into the watershed as it is. Has anyone thought about using rocks instead of grass? No lawns, no fertilizer, no wasted water, no geese... But I digress...

That such a project is even being considered demonstrates complete disregard for the natural environment for the sake of money (once again). On that note, I wonder how much money the golf course is prepared to pay for the Permit for this destruction. And who gets the money from it, the animals for a new house?

The area in question is beautiful as it is. Why convert it to more human blight? We don't need more area covered with manicured lawns. Haven't we done enough damage already?

Sincerely (disappointed),  
Rick Hordin  
Lake Tahoe

197-1

I97-1

The commenter's belief that the project should not be considered at all is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**LT golf course**

ROB H [robtahoe@aol.com]

**Sent:** Thursday, November 04, 2010 3:53 PM

**To:** Project, Upper Truckee

**Cc:** tahoekolb@yahoo.com

Bring in professional Golf course design management team... Jack Nicholas, Arnold Palmer Ben Crenshaw( designer of Clearcreek in Carson City.. They have the KNOW How... redesign per there professional requirements...

THE PROBLEM IS NOT THE GOLF COURSE... THE PROBLEM IS THE TAHOE KEYES... WE ALL KNOW IT... THE CRITICAL WATERSHED AREA IS THE TAHOE KEYES MEADOW...

Bears, deer, other natural animals along with a river taking it's natural course contribute to the erosion and pollution upstream... The Keyes needs to focused on... Bring back the superfund, remove the homes and restore the REAL natural filter system of the Truckee

Finally... Please use professionals outside of the government, the army corp of engineers specifically... Private business Knows what to do...

198-1

**ROB Hordzwick**  
**775 815 0899**  
**OFF 588 1300**  
**McCall Realty**

I98-1

The commenter's view that the Tahoe Keys is the problem is noted and is outside of State Parks' jurisdiction. The commenter suggests bringing in a professional golf course design management team. The approaches to reconfiguring the golf course that are proposed under Alternatives 2, 3, and 4 were developed in collaboration with John Harbottle Design, a leading golf course design firm, and additional golf course designers will be consulted during the design process.

**lake tahoe golf course**

Peter Illing [peterilling@sbcglobal.net]

**Sent:** Tuesday, October 12, 2010 2:16 PM

**To:** Project, Upper Truckee



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to whom it may concern,

it's difficult for me to comprehend why the lake tahoe golf course should be closed. i've lived in south lake tahoe for over ten years and visited the course at least four days a week, through out the season. the monies generated and jobs created by having this recreational facility open has to be quite substantial. the course isn't causing any harm to the local residents but i guess they would prefer to have the open space so there property values might go up. that's debatable. i also believe that it's sad that the local golfers will have to spend there money over the hill in nevada if they want to play golf. the executive course, Paradise, doesn't meet the needs of serious golfers. in any event i would think that with the state of california, cash strapped as it is, and the unemployment rate as high as it is, closing the course would be a very bad idea. maybe with the loss of income and the ensuing layoffs it might require the county to layoff a few police officers teachers or fireman. we'll see.

thank you

peter illing

1451 glen eagles road

south lake tahoe, ca 96150

530-523-3397

199-1

I99-1

The commenter's support for maintaining the golf course and its economic value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.

**Alternative 2**

njane@umich.edu [njane@umich.edu]

**Sent:** Friday, October 22, 2010 1:52 PM

**To:** Project, Upper Truckee

I100

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To whom this may concern:

I am writing to let you know that I think alternative 2 is the best solution to the restoration of the upper Truckee river. This is the best alternative because it allows the river to be restored without upsetting the economic benefits to the tourists/golfers in Lake Tahoe, while enhancing the environment and usefulness to the local patrons like myself. No other alternatives even come close!

I100-1

Thank you.  
Nicole M Jane, DDS, MS

I100-1

The commenter's support for Alternative 2 and its economic and environmental value is noted. This comment does not raise issues regarding the adequacy, accuracy, or completeness of the draft EIR/EIS/EIS.