



Governor's Office of Planning and Research
Attn: Director Ken Alex
State of California
Ca.50m@opr.ca.gov

June 12, 2014

Subject: Discussion Draft for the Governor's Environmental Goals and Policy Report (Sept. 2013)

Dear Director Alex:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments on the Discussion Draft for the Governor's Environmental Goals and Policy Report (Report). FOWS is a community-based non-profit dedicated to preserving the beauty of the West Shore of Lake Tahoe. We appreciate California's efforts to reach out to smaller mountain communities for feedback on how the state can support reductions in Greenhouse Gas (GHG) emissions in rural communities and thank the Governor's staff for holding a public meeting in South Lake Tahoe on June 4th and allowing us more time to provide comments.

At the meeting it was recognized that there are many unique challenges faced by rural communities in the Tahoe Basin and the Sierra Nevada at large. As OPR staff acknowledged, the OPR's current policies are very "urban focused" and OPR does not yet have the right strategies for addressing the unique issues in rural mountain communities. The Sierra Business Council representative stated that the "one-size-fits-all approach [for smart growth] doesn't work in our Region." Staff from the Sierra Nevada Alliance also noted that "SB 375 is not a good tool for land conservation" (which is extremely important in the Lake Tahoe Basin). The Sierra Nevada Conservancy discussed the importance of addressing development in the Sierra Nevada and impacts to water supply, however staff noted "Tahoe's more concentrated so land use issues are different."¹ In sum, we need different guidelines and ways to address climate change impacts in our small, rural mountain communities in the Tahoe Basin, and we appreciate the state's interest in seeking our input.

However, we are concerned that many communities in and around Lake Tahoe are facing a very unsustainable future due to a variety of factors, including proposed resort developments, increasing demand for dwindling water resources, increased VMT, more development of forested areas, and plans which contribute to unhealthy economies (discussed in more detail below). Tahoe's designation as an MPO is also unique, and although it has provided benefits, MPO requirements tend to be based on urban areas, for which Tahoe communities are not. It was also noted at the meeting that the CEQA process is not adequately adapted for addressing the seasonal tourism impacts which are paramount in Lake Tahoe.

Unfortunately, it does not appear that there has been adequate engagement with small rural communities based on the overview of previous public meetings. We feel there is a strong need for far more discussion and coordination with rural mountain communities – both in and outside of the Tahoe Basin - on this Report. Our comments focus primarily on the unique factors which make planning for our Tahoe Basin communities even more difficult. Detailed comments and recommendations are attached below.

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant
Friends of the West Shore

¹ It appears the TRPA/TMPO was the only entity that did not recognize these strategies are not appropriate for Lake Tahoe. Additional discussion is provided later in our comments.

Attachments: FOWS comments on the TRPA RPU EIS: (3 documents): Excerpts related to smart growth, watercraft emissions, and air quality baseline (2012)
TASC Comments on Emissions from watercraft (2008)
"Dangerous Developments," Sierra Nevada Alliance (2007)
FOWS & TASC Comments on Proposed Ferry Project NOP (2014)

Detailed comments on the Report:

1. Many of our Basin's communities are rural with relatively small full time residential populations, yet are greatly visited (and impacted) by millions of tourists each year.

The OPR's urban 'smart growth' strategy, as well as CEQA requirements, are not equipped to address the issues we face. We need the opportunity and resources to work with California and other agencies to explore how our communities can address climate change issues.

2. The Lake Tahoe watershed of a federally-designated Outstanding National Resource Water (ONRW), which means the water quality of Lake Tahoe cannot be degraded.

More resort development is promoted as 'beneficial' in TRPA's Regional Plan Update (RPU) due, in part, to claims that building 'mixed use locations' will reduce per capita driving. This ignores the VMT from visitors coming into and leaving the Basin. Further, for the Lake Tahoe watershed, more pavement and building closer to the Lake – also promoted by the RPU under the guise of walkable/bikeable communities – will cause more pollution to enter Lake Tahoe and degrade Lake Tahoe's water quality, contrary to the ONRW requirements that Lake Tahoe's water quality cannot be degraded.

3. Unlike other Sierra Nevada communities, the Lake Tahoe Basin is regulated by the Tahoe Regional Planning Agency (TRPA), an agency created by the congressionally approved Bi-State TRPA Compact. Extensive growth was never anticipated in the Basin.

Clearly recognizing that urbanization was harming Lake Tahoe's environment and water clarity, the Compact required the TRPA to adopt environmental threshold carrying capacities (ETCCs) which protect Tahoe's unique natural resources, followed by a regulatory plan that would allow orderly growth consistent with achieving and maintaining ETCCs. With this responsibility came a need to identify the carrying capacity of Lake Tahoe (for example, how many homes can be built before polluted stormwater runoff from too much soil coverage cannot be mitigated; or how many vehicles can drive in the Basin before air quality standards are violated and air is unhealthy to breathe). Although the agency has yet to perform this analysis over thirty-five years later, the failure to achieve and maintain the thresholds, and the ongoing loss of clarity in the Lake (including the nearshore areas), indicates that *we have likely already exceeded the capacity of the Lake Tahoe Watershed*. Growth and new development were never intended to be endless or unlimited within the fragile Lake Tahoe watershed. In fact many implementers the 1987 Regional Plan for Lake Tahoe envisioned mostly redevelopment once the new development allowed by the Plan had been used up.

Unfortunately, the 2012 Regional Plan Update failed to acknowledge this as it allows substantially far more new development in Tahoe's watershed although many environmental standards have not been achieved or are getting worse (for example, declining water clarity and quality in the nearshore²).

Although additional environment protections are required by the TRPA Compact, Tahoe communities have recently been faced with a new TRPA Regional Land Use Plan (the 2012 Regional Plan Update [RPU]) which applies the urban one-size-fits-all 'smart growth' approach to our communities, yet the approach is based upon land use challenges in large populated areas with mostly full time residents, whereas Tahoe's infrastructure and economy mean millions of visitors and a large number of seasonal, low-income jobs. This approach has already created significant challenges for Basin communities.

In addition, TRPA's RPU takes the smart growth "infill" concepts to a whole new level, allowing massive new hotel/resort structures on undeveloped land outside of the 'urban boundary,'³ increasing allowed heights and densities well beyond those previously allowed, and creating development right transfers, conversion, and bonus mechanisms that TRPA's own economic reports show will most likely provide more condos.⁴ This certainly does not comport with the state's GHG guidelines, which focus on residential improvements, infill, and sustainable communities.

4. Although our communities are not 'urban' like other metropolitan areas in California, the Tahoe Basin is a designated Metropolitan Planning Organization (MPO).

This designation places Tahoe planning agencies in a situation of following standards and guidelines and competing for planning dollars that are aimed at large urban areas which are not appropriate for small, rural communities with heavy seasonal tourism. In fact, it appears 'urban areas' are generally considered to be areas with residential populations greater than 50,000.⁵ However, the most populated area in the Tahoe Basin, the City of South Lake Tahoe, has less than 22,000 full time residents,⁶ while most smaller communities around the lake have a few hundred to a few thousand full time residents, at most.⁷

² <http://www.dri.edu/nearshore-water>

³ The new "Resort Recreation District" zoning allowed in the RPU identifies two undeveloped locations for resort hotels. A third and fourth location have been proposed in North Lake Tahoe on undeveloped ridgelines (Northstar and Martis Valley West; an NOP has already been issued for the latter).

⁴ From February 2014 Advisory Planning Commission minutes, p. 3 in March packet: "*Both [economic] studies using different assumptions and methodologies came up with common conclusions... The projects that are most feasible are condominiums...*" at <http://www.trpa.org/wp-content/uploads/March-12-2014-APC-Packet.pdf>

⁵ http://en.wikipedia.org/wiki/List_of_California_urban_areas

⁶ http://en.wikipedia.org/wiki/South_Lake_Tahoe,_California

⁷ According to census data online, residential populations for selected rural areas around Lake Tahoe include: Tahoma, CA: 1,191; Homewood, CA: 200; Tahoe City: 1,557; Tahoe Vista: 1,433; Meyers, CA: 3,000; Kings Beach, CA: 3,796.

5. The GHG reduction strategies in SB 375 are focused on metrics involving residential per capita VMT, using cars and light duty trucks. Tahoe's communities are visited by millions of tourists each year.

This VMT and energy use per capita approach fails to account for the impacts of tourists, Nevada residents, and off-road motor vehicles, including motorized watercraft. According to the California Air Resources Board's Emissions Inventory for Lake Tahoe, off-road motorized vehicles contribute more ozone precursors than on-road vehicles in the Basin, thus it is likely boats also create more GHG emissions than on-road vehicles⁸). The TRPA RPU and TMPO Regional Transportation Plan fail to address off-road motor vehicle emissions and provide for no reductions in motorized watercraft use.

In addition, the TMPO has partnered with other agencies to pursue approval for a waterborne taxi project. Although advertised as an alternative to driving vehicles, the air pollution, water pollution, and GHG emissions associated with the estimated 2,000 gallons of gas the taxis would burn *per day* is expected to actually create *more pollution* than if passengers drove their cars. Further, the infrastructure requirements for this ferry project would include larger boat ramps and marinas, more parking lots closer to the lake, and other requirements which would further harm Lake Tahoe's water quality. Finally, the economics of the project are anything but sustainable. The cost of the ferry operations are large, and passing those costs to passengers would likely make use of the ferry too expensive for most commuters. Additional details are provided in the attached comments we submitted on the NOP. This is another example of a unique factor for our area that statewide strategies do not currently account for.

6. The Basin is also subject to development pressures from large corporate resorts, especially ski resorts, which aim to build new 'villages' while relying upon very unsustainable practices for profit (use of water resources for snow-making; high demand for electrical power, etc.).

These 'villages' are unique to the Sierra Nevada – no entity is proposing a ski resort village in downtown LA or Sacramento – such development pressures alone warrant unique consideration. The state's urban smart growth approaches are highly incompatible with the characteristics of these 'tourist destinations' and the pressures they are bringing to our rural communities in and around the Tahoe Basin.

That said, Tahoe Basin communities are currently faced with large, resort developments which will require intensive water use (snow-making) and increases in power demand⁹ (creating more GHG emissions), will further divide our economic demographic (as stated at the meeting – wealthier visitors versus local, part-time minimum wage employees), draw more vehicles to our Region, place more people in fire-prone areas, disturb and build out more natural land, and cause further harm to our Lake Tahoe watershed:

⁸ See attached 9/25/2008 letter from the Tahoe Area Sierra Club discussing the GHG emissions from motorized boats versus on-road vehicles; CARB 2012 EI for CA side of Lake Tahoe Basin: http://www.arb.ca.gov/app/emsinv/2013/emssumcat_query.php?F_YR=2012&F_DIV=-4&F_SEASON=A&SP=2013&F_AREA=AB&F_AB=LT#8

⁹ In fact, a major electrical line project to increase capacity for the growth of primarily ski resorts has been proposed in North Lake Tahoe, further confirming the increased energy needs the resorts will require: <http://friendswestshore.org/other-activities-affecting-the-west-shore/> - see "Calpeco Electrical Line Upgrade Project."

Large Resort Developments in Planning Stages in our Region:

- Homewood Mountain Resort – approved;
- Boulder Bay Resort (North Stateline) – approved;
- Squaw Valley Expansion – proposed;
- Northstar Expansion – proposed;
- New development outside of communities on forested ridgeline – proposed [Martis Valley West Area Plan];
- New resort hotel land use on natural land [Edgewood Mountain] – land use change approved in RPU;
- New resort hotel land use on natural land [Heavenly Valley California base] – land use change approved in RPU;
- Expanded Edgewood Hotel and Golf Course – approved; and
- More land coverage closer to Lake Tahoe, more development of existing open forest lands – land use changes approved in RPU;

Therefore, while OPR is seeking policies to “*prioritize efficient infill development, preservation of the state’s natural and working lands and lands of significant cultural value, and efficient development patterns that take advantage of existing infrastructure and minimize costs to taxpayers*” (p. 1), Tahoe communities are faced with massive new developments approved/promoted by the TRPA (and local jurisdictions following TRPA’s new RPU) which appear to run contrary to the state’s efforts to create more sustainable California communities and use our natural resources efficiently.¹⁰ We do not believe this is what California had in mind when it approved sustainable community grant funds (Rounds 1 and 2) for the TMPO.¹¹ The development pressures combined with the unique residential and visitor demographics of our area provide further evidence of the need for our rural mountain communities to have more engagement with OPR on these policies.

7. Sustainable communities are also considered to be economically-healthy. This is yet another struggle for Tahoe Basin communities as our economy is primarily tourism-driven.

As stated at the meeting by the presenter from the Lake Tahoe Sustainability Collaborative, we can’t base our economy on the hospitality and tourism industry, which tend to provide minimum wage, part time jobs. Yet the 2012 TRPA RPU is focused on drawing more large resort hotels and amenities which will create more minimum wage, part time jobs. This presents yet another struggle for our Basin communities and makes it difficult for communities to have the opportunity to truly evaluate how they can be sustainable.

In essence, Lake Tahoe communities are not only lacking strategies for addressing climate change issues and our own communities’ sustainability (environmentally, economically, and socially), but we are also placed in the position of being regulated by a new Land Use plan (the TRPA RPU) which inappropriately applies the urban model to

¹⁰ “*As the state continues to grow, we must do so in a way that is in harmony with the state’s environment and natural resources.*” (p. 1)

¹¹ http://sgc.ca.gov/planning_grants_archive.html

Lake Tahoe. This has made it difficult for Tahoe communities to have the opportunity and room to engage with California and address the need for unique strategies for individual communities. As noted, the Report is based on urban-focused strategies. Consideration of rural mountain communities is a key component that needs to be reflected throughout the Report.

8. There is clearly a need for metrics and tracking mechanisms tailored to the unique strategies our rural communities have yet to develop to address climate change and population pressures.

Given the limited new growth in most Tahoe communities relative to the rest of the state, perhaps the strategies needed to achieve a 7% per capita reduction in GHG emissions are as simple as providing incentives or other mechanisms for property owners to retrofit existing buildings and improving transit systems around the Lake. For example, one reason transit is helpful for employed commuters in places like the Bay Area is the ability to predict schedules and arrive to work on time. Improved and consistent timing would also likely contribute to increased transit use by visitors. All in all, alternative strategies for reducing per capita GHG emissions in low-growth rural areas have not been explored separate from the urban smart growth model applied by the TRPA RPU. In fact, El Dorado County also identified the need for unique metrics in rural areas in recent comments related to SB 743.¹²

As noted previously, another factor unique to the Lake Tahoe Basin includes a proposed waterborne transit or 'ferry project.' However, as noted in the OPR's Preliminary Evaluation of Transportation Metrics, "...*subdivision (b) of the new Section 21099 requires that the new criteria "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."* And "SB 743 requires that whatever metric is developed, it must promote reductions in greenhouse gas emissions."¹³ However, the report also notes that the proposed metrics and discussion are only focused on on-road motor vehicle trips (e.g. "...*VMT counts only motor vehicle trips, not trips taken by other modes...*" [p. 8]). As the ferry project currently under review by the TMPO, TRPA, and others proposes a waterborne transit system which will use approximately 2,000 gallons of gas per day, it is highly likely that the 'per capita' emissions of ferry passengers will be far higher than those generated by motor vehicle drivers. However, there is no current metric available from OPR, or the TMPO, which allows for this analysis. Further, the ferry project is more likely to encourage recreational use by visitors than to encourage commuting use by residents. Regardless, this is another unique situation that the current state policies do not adequately address. In this case, however, we are able to recommend a metric which may apply to this kind of unique situation: emissions per person per mile or EPPM. We have suggested this metric to the TRPA and TMPO repeatedly for several years, and again noted it in our comments on this ferry project's NOP. We now ask that the state consider this metric (or some iteration thereof which measures the EPPM). Details are provided in

¹² http://www.opr.ca.gov/docs/SB743_PublicComments_INDEX.pdf; see 2/14/14 comments: "... --There needs to be a recognition that rural or growing areas do not function the same way as urban or infill areas. As such, separate rules need to be established to accommodate the differences."

¹³ <http://www.opr.ca.gov/docs/PreliminaryEvaluationTransportationMetrics.pdf>

our attachments, including comments on the GHG emissions from boats, comments on the draft RPU EIS, and comments on the Ferry Project NOP.

Further, as the RPU's strategy is based on placing jobs and residences within ½ mile of each other, assuming there could be some GHG-related benefit to this for our rural communities, we are seeing proposals to locate hotels in Tahoe City's (relatively) more urban 'Town Center' yet the employee and affordable housing would be located in other areas greater than ½ mile away. Further, the hotels would be closer to amenities like grocery stores, while the housing would be farther away. First, this seems contrary to the concepts behind smart growth – which encourages placing new jobs and residences closer together. Second, this is another example of how our tourism-based economy creates unique situations that require unique considerations and metrics for tracking GHG emissions.

Recommendations to OPR:

In summary, we ask that the OPR further engage our rural communities in the Lake Tahoe Basin to consider and address sustainability issues in our communities in light of the many unique issues we are dealing with. Topics include, but are not limited to the following:

- More engagement with rural communities to develop unique strategies for the sustainability of rural areas;
- The inclusion of a Tourism-related Element, which acknowledges the environmental and economic realities in tourism-dependent areas;
- A "Resort" Element to help rural mountain communities deal with unique development pressures not generally found in non-mountain areas of the state(e.g. Ski Resorts);
- A Water Quality Element which addresses snow-making demands and development in light of the unpredictability of the future water supply;
- A metric to assess the emissions from recreational watercraft use and evaluate how we can reduce those emissions;
- A means to assist rural communities with developing appropriate sustainability strategies in light of regulation by an MPO that is subject to follow more urban strategies;
- Metrics for measuring and tracking emissions associated with alternative transit modes unique to our area, including proposed waterborne service (Ferry Project).

Additional comments on the document:

“Invest in climate readiness and adaptation to Safeguard California”

“Even as the state is successfully reducing GHG emissions, some amount of climate change is inevitable. In fact, the state is experiencing effects of climate change today. Therefore, investments and policies must be in place to protect existing high value infrastructure and natural systems and to avoid making investments in high-risk areas. These actions can take many forms, but must include boosting resilience of natural systems to recover from climate impacts, protection of critical infrastructure, and being mindful of future climate change in decisions being made today.” (p. 6)

We believe any investment in fire-prone mountain areas would be ‘high-risk’ so long as it depends on snow (e.g. ski resorts) and/or places more people and property in fire danger. However, it is unclear what California proposes to do or affect to truly make the stated goals above happen in rural mountain communities. As discussed at the meeting, forests up and down the Sierra Nevada are not healthy and face serious threats from climate change. These forests also provide most of California’s drinking water and protection is critical.¹⁴ Yet the Report shows that most population growth is expected to occur in these areas (p. 9).

- Are there actions California can take to prevent more sprawl in these areas?
- Do these estimates reflect plans already approved by state or local governments, or are there opportunities to affect future decisions on development?
- Can California consider new measures to prevent the development outcomes predicted in the Report?

In areas such as the Tahoe Basin, new residential growth is presumed to be limited. Although the 2012 TRPA RPU added an addition 3,200 new units for residential development, this is still minor compared to anticipated growth throughout urban areas in California. In these instances where rural communities are already built out or anticipated to experience very little increased residential population, the Report currently lacks important guidance needed by such rural communities.

In addition, as noted above, the document fails to include strategies related to tourism-dependent areas. As the Report encourages better planning, natural resource protection, and notes the dangers of increased populations in mountain environments, regional and local governments are currently approving large scale projects and plans which do not follow these guidelines.

- What affect can California have on these decisions?

Finally, climate change will mean increased fire danger. Placing more developments in fire-prone areas will place more people in harm’s way.¹⁵ As the document notes “*Alongside [GHG reductions], the state will need to continue taking steps to prepare for the inevitable impacts of climate change.*” (p. 9). More wildfires are already inevitable; preparing for them should, at a minimum, including *not* placing more developments in harm’s way, especially where roadway options are restricted, such as at Lake Tahoe. There will also be even less water available to defend mountain communities from advancing fires – a combination which we expect only increases the public safety threats from wildfires.

¹⁴ “*Nearly two-thirds of the state’s rain falls in the sparsely populated northern and mountain regions of the state, while most of the demand occurs in the more populated coastal and southern parts of the state.*”²⁰ *Preservation of these watersheds, therefore, is a critical component of the state’s water system.*” (p. 11)

¹⁵ See “Dangerous Developments” (attached).

“Envisioning our Choices” and “The Role of Metrics”

We recommend these sections (p. 11-13) be expanded upon to include separate, focused sections which separately address 1) mountain areas subject to extensive new population growth which cannot be limited or prevented (see previous questions), and 2) smaller, rural mountain communities subject to tourism impacts and the strategies they can take to help reduce GHG emissions and adapt to climate change. In fact, the discussions related to small rural communities may be quite extensive when unique local factors are considered.

Just as the climate change-related strategies for rural mountain communities will vary, so should the metrics used to track progress. Metrics need to be clearly tied to the strategies used by individual communities.

“Key Actions to Decarbonize Energy and Transportation:”

As the report notes, *“Increased collaboration, joint planning, and integration across agencies and goals will be required. Furthermore, the water-energy nexus needs to be better incorporated into energy planning.”* (p. 16). As discussed at the meeting, there is a need for better state coordination with local agencies and communities. Members of individual communities will be able to better represent their unique areas in collaboration with local government representatives. For example, Placer County's jurisdiction spans over multiple unique communities, each with different land uses, development patterns, activities, and infrastructure.¹⁶ Engagement with representatives from each community is paramount to determining the most effective strategies for planning energy efficiency.

“4. Develop a strategy for retrofitting and improving the energy efficiency of the existing residential, commercial, and state-owned building stock.”

We strongly support this recommendation and believe it should be afforded more attention in the Report. In many rural mountain communities, homes were built decades ago. Specifically in Lake Tahoe, most residential development is assumed to have already occurred (for this note, we exclude the changes in the RPU which allow new homes beyond envisioned in the 1987 Regional Plan). That said, there are 1,000's of homes in the Basin that are not energy efficient. We suspect this is the case in other, older rural communities as well, and encourage the state to help identify programs to retrofit existing structures.

“Key Actions to Preserve and Steward State Lands and Natural Resources”

“1. Streamline land acquisition and management”

We agree that additional public land acquisition of natural resources will provide environmental benefits. We recommend the Report also include strategies which aim to keep current open space forest land open. For example, local or regional governments should not approve Plan amendments which allow new development on undeveloped forest lands where it is not currently allowed. In addition, as noted by the Sierra Nevada Conservancy's presentation at the meeting, the economic and environmental value of Sierra Nevada watersheds is extremely high; these resources should not be compromised to build unsustainable projects to the benefit of a few, or to generate additional tax dollars for local

¹⁶ The needs and conditions in Auburn or Squaw Valley are quite different, as are communities like Homewood, Tahoe City, or Kings Beach.

counties, at the expense of California's public health and safety. Water supply and healthy forests cannot be built or created elsewhere.¹⁷

However, so long as the actual value of forested lands is not considered (for example, what is the economic value of the water provided by the forest compared to the cost of providing the water in some other way and the carbon sequestration provided by our forests), forest lands will continue to be targeted for new developments such as those involved in the Martis Valley West Area Plan. We recommend the OPR work with other entities, such as the Sierra Nevada Conservancy, to determine more protective measures for our forests which recognize not only the long-term economic savings they provide the entire state, but the irreplaceable nature of forest ecosystem services.

“2. Provide resources for long-term stewardship of lands”

We support state efforts to seek additional funding for long-term stewardship of land. The protection of resource lands is put at risk by lack of ongoing funding, especially when agencies charged with purchasing and protecting lands are proposing to sell them to maintain funding (as is the case with the California Tahoe Conservancy's Asset Lands program).¹⁸

“3. Build resilience in natural systems”

Given the importance of the Sierra Nevada to our water supply, to carbon sequestration, to habitat protection, and the many other important environmental and social services provided by our forests, the threat from increased development in these areas is too great to simply discourage. What measures can California take now to protect these areas from developments proposed by local or regional governments?

“4. Innovative land use planning to balance multiple objectives”

To clarify the information that is and is not in the document, we recommend adding “in urban areas” to the following statement: “*California has already undertaken complex planning processes that may serve as models for innovative land use planning efforts that balance multiple objectives in urban areas.*”

“5. Build a strong, sustainable water system”

Water supply and conservation are clearly of extreme importance to California. We agree that “*Californians must get even smarter about how they use water.*” But, this also means planning now to avoid wasting precious water. For example, new developments which aim to build unsustainable, large resort hotels, luxury accommodations, and other ‘extras’ and rely upon water-intensive snowmaking should be prohibited. We are past simply encouraging or promoting water conservation, let alone denying what we already know about California's

¹⁷ One clear example of a zoning change that will damage an undeveloped forest to benefit private developers is the proposed Martis Valley West Area Plan: <http://friendswestshore.org/other-activities-affecting-the-west-shore/>

¹⁸ <http://tahoe.ca.gov/asset-land-sales-information.aspx>

future water (and snow) supply. As unfortunate as it is for skiers and snowboarders alike, skiing on the Sierra Nevada will likely become a short-lived, sporadic experience (if at all) and only at the highest elevations. In fact, it's already been noted that within just a few decades or less, no California ski resorts would be able to host the winter Olympics because there will not be enough snow.¹⁹ It is not sustainable to now build new projects that we know will rely on unsustainable amounts of water and electricity in the future.

Build Sustainable Regions that Support Healthy and Livable Communities

As the report notes, “*A sustainable community is one that that promotes equity, strengthens the economy, protects the environment, and promotes public health and safety (California Government Code, Section 65041.1).*” What affects each of these factors will vary among different rural communities. As identified by most participants at the meeting, the urban smart growth approach is not appropriate for small rural communities. In addition, the current resort development model plaguing communities in and around Lake Tahoe does not recognize the following as stated in the report: “*For rural areas, these services [that foster sustainable communities] include the ecological benefits provided by intact watersheds, forests, and other natural systems.*” (p. 26). We encourage the OPR to further engage local communities on this issue.

¹⁹ <http://news.nationalgeographic.com/news/2014/02/140221-climate-change-winter-olympics-global-warming-science/>; <http://teamclimate.com/category/uncategorized/>