

The EIR/S must include detailed comparisons between the existing and proposed uses, densities, and other requirements, and highlight the changes clearly so the public and decision-makers can easily see the differences.

The NOP also states: “*The project-level analysis of the Tahoe City Lodge Pilot Project will assume that, because of the nature of the project as a hotel/lodge, project effects on employment levels will be minor and issues of population, employment, and housing can be dismissed with minimal discussion.*” (p. 15). A 120-unit hotel with several extra amenities, which aims to draw numerous overnight guests to the area, all of which requires additional employees, will have an impact on population, employment, and housing. In fact, the TC Lodge Project objectives specifically include: “*develop[ing] high quality tourist accommodations and amenities in the Tahoe City Town Center*” and “*...provid[ing] new jobs, increased property and transient occupancy taxes, and other economic benefits.*” (NOP, p. 7). As the objectives specifically call out increased tourist accommodations, jobs, and other economic benefits, the project will affect employment levels, population, traffic, and housing issues.

The EIR/S needs to comprehensively analyze and disclose the TC Lodge Project’s impacts on all of the above listed areas.

11. Adaptation to Climate Change

The NOP and draft Area Plan give very little attention to the need to **adapt** to the impacts of climate change. The document focuses solely on analyzing GHG emissions.⁶⁰ However, available climate change information has for years indicated that our precipitation patterns will shift, meaning we will see more rain, less snow, and heavy rains will often come in large, individual storms. This will result in a lot of rain in a short period of time, and, as noted by meteorologists,⁶¹ we need to prepare for larger episodic storms.⁶² In fact, meteorologists have continued to warn the public of the likelihood of increased 200- to 500-year Megaflood storm events as a result of climate change.⁶³ In terms of protecting our future Lake Tahoe environment, now is the time to plan for accommodating more flood water, especially in areas that have been previously mapped as SEZ.

⁶⁰ “The EIR/EIS will evaluate potential air quality impacts using the latest widely accepted air quality modeling tools. Projected air quality conditions and GHG emissions associated with the Area Plan and the Tahoe City Lodge Pilot Project will be compared against the conditions contemplated in the Regional Plan EIS, RTP/SCS EIR/EIS, and Lake Tahoe Sustainability Action Plan to determine whether they are within the envelope of what has already been analyzed... With regards to Tahoe City Lodge Pilot Project impacts on GHGs and climate change, the EIR/EIS will quantify estimated operational carbon dioxide emissions from both stationary and mobile sources.” (NOP, p. 16)

⁶¹ http://www.waterboards.ca.gov/lahontan/board_info/agenda/2015/jan/item_13.pdf

⁶² Excerpt of Summary Point slide from referenced presentation to the Lahontan Regional Water Quality Control Board, January 2015 included below in document.

⁶³ http://tahoe.ca.gov/wp-content/uploads/2014/06/files/2013_VO/UTR_/Dettinger_Ingram_sciam13.pdf;
<http://www.tahoeculture.com/events/north-shore-events/arkstorm-impacts-at-lake-tahoe-at-terc-jan-31/>;
http://meteora.ucsd.edu/cap/pdffiles/ARKStorm_Summit_Handout_Final.pdf

SUMMARY POINTS

- California's climate is prone to year-to-year and longer term variation in precipitation—drought is an expected part of our climate—present and future.
- Climate warming will broadly affect California hydroclimate and impact water systems across-the-board, but heterogeneously. Expected impacts of climate change: longer “warm” season, loss of spring snow pack, greater winter flood risks.
- Climate changes in annual precipitation remain uncertain in northern California. However, climate change are currently projected to affect precipitation intensities—fewer overall wet days but more intense heavy events.
- Implications:
 - Less snow, more rain
 - Earlier run-off from traditionally snow-fed mountain watersheds
 - Larger floods
 - Potentially, less stored water
 - Water quality implications: warmer surface water, warmer dry spells, .

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The EIR/S must examine the impacts that will result from 200- and 500-year storms, including where the water will go and how it will be managed, under each alternative.

We request Placer County take the opportunity to plan for this now by designing an Area Plan with adequate flood plain protection that accounts for the best available science. The EIR/S must evaluate the impacts of flooding, and identify mechanisms and available land that will be used for flood attenuation.

12. Stream Environment Zones (SEZs)

a) SEZ land and capability changes:

The Tahoe City and Kings Beach Town Centers have been identified as areas with a large amount of SEZ land, as reflected in the following maps from the Existing Conditions Report:⁶⁴

⁶⁴ Existing Conditions Report, Figure 2.6. Land Capability: Existing Conditions and Figure 2.7: SEZ Existing Conditions.
<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUUpdate/Ch-2-Conservation-Pages-21-41.pdf>