DRAFT DECISION NOTICE

and

FINDING OF NO SIGNIFICANT IMPACT

HISTORIC FACILITIES BMP RETROFIT PROJECT

U.S. FOREST SERVICE

LAKE TAHOE BASIN MANAGEMENT UNIT (LTBMU)

EL DORADO COUNTY, CALIFORNIA

BACKGROUND

The Tallac Historic Site is a publicly owned recreation facility that is managed by the Forest Service, Lake Tahoe Basin Management Unit (LTBMU). For the purposes of this project, the Tallac Historic Site includes the Pope Estate, Baldwin Estate, Valhalla (Heller Estate), and Tallac Point Beach (also known as Kiva Point Beach). The three estates (Pope, Baldwin, and Heller) form a federally designated historic district. The site is bordered by Lake Tahoe on the North and State Route 89 (SR 89) on the South. There are two vehicular entrances to the Tallac Historic Site from SR 89; one entrance is managed with a gate that is operated by a non-profit organization under the terms of a special use permit. The general public essentially accesses the entire site from one entry road that splits into two main drives that lead to the Kiva Beach parking area and Tallac Public Parking lot. There is another entrance on SR 89 that leads to the Taylor Creek Visitor Center. The Taylor Creek Visitor Center structure itself is not considered part of the site; however the visitor center entrance road is considered in this project.

The multiple site entrances on the highway (the Valhalla entrance, the Tallac/Kiva entrance, and the Taylor Creek entrance) often cause confusion for visitors. The configuration of the roadways and parking areas do not make efficient use of paved surfaces. The site attracts a high number of visitors during the summer months. The volume of visitors using the site on a typical summer weekend usually exceeds the managed parking capacity resulting in unmanaged parking, soil and vegetation compaction, and heavy traffic congestion along SR 89. The site is open to cross country skiing and snowshoeing in the winter, but none of the buildings are open for regular viewing or use during winter months.

All facilities proposed for rehabilitation are Forest Service properties located on National Forest System (NFS) lands. Rehabilitation of this facility is an identified need on the Tahoe Regional Planning Agency (TRPA) Environmental Improvement Program (EIP) list.

The desired condition at Tallac Historic Site is to provide a high quality recreation setting and facilities that meet water quality protection best management practices (BMPs) to protect the water quality of Lake Tahoe and to protect the integrity of the historic facilities.

The Environmental Assessment was published for comment on March 7, 2014. Public input during this comment period has informed the preparation of the Environmental Assessment (EA) document and my decision to implement an alternative described in the EA.

DECISION

I have reviewed the Historic Facilities BMP Retrofit Environmental Assessment (EA), the Project Record, and the Response to Comments (DN/FONSI, Appendix C).

I have decided to implement Alternative 4 as described below and in the EA (Section 2.4). Alternative 4 was developed in response to comments received during the 30-day comment period and includes some elements of both Alternative 2 and 3. In summary, the selected alternative will reduce the environmental impacts and improve the recreational opportunities and associated infrastructure in the Tallac Historic Site by retrofitting the area with water quality protection BMPs and upgrading facilities. The selected alternative also upgrades facilities to make them responsive to current and projected recreational demands and to be compliant with legal requirements for accessibility. The selected alternative also improves vehicular and non-motorized traffic patterns within the project area while limiting impacts to historic features.

ALTERNATIVE 4

See **Figure 1** for graphic representation of the selected alternative.

Activities include:

Installation of storm water management structures to infiltrate storm water (based on infiltrating water from the 1-inch in 1-hour and 2-inch in 24-hour storm events) including, but not limited to:

- infiltration basins/trenches
- drip line trenches or other below-ground infiltration system to treat stormwater from building roof lines where problems with erosion or pooling stormwater exist
- planted swales

- Below-ground infiltration features (open-bottom, non-conveyance structures).

Installation of BMPs along the shore zone (A) including:

- Repair/replacement of existing fencing along the beach (approximately 2000 linear feet)
- Slope stabilization where needed along the beach using vegetation or structural means (i.e. boulders, terraces, stairs, etc.).

Installation of BMPs at Tallac Point including:

- Installation of interpretive signage at Tallac Point Beach (also known as Kiva Point Beach) about dog and human waste issues, as well as about the sensitivity of the marsh habitat and presence of Tahoe yellowcress (a candidate species considered under the Endangered Species Act)
- Removal or restoration of select user-created trails (**B1**)
- Installation of a barrier between the Tallac Point Beach area and Taylor Creek Marsh. The barrier may be in the form of a split-rail fence, bollards, posts with signs, etc. approximately 850 feet in length and maximum 60" high. (**B2**)
- Installation of a restroom building (**B3**) that contains 6-8 unisex universally accessible toilet rooms in a design similar to the existing restroom facility at the Tallac public parking area.
- Upgrade the existing pathway from the parking area to the beach to meet accessibility standards (surface is to be either a pervious paving system or a compacted decomposed granite surface) (**B4**)
- Addition of 20 parking spaces in the Kiva Point parking lot and associated circulation routes (**B5**).

Reconfiguration of vehicular circulation patterns including:

- Reduction in the number of SR 89 entrance road intersections on the site from 3 to 2
- Removal of the existing Tallac/Kiva intersection (**C2**) and consolidation of it with the Taylor Creek intersection (**C4**)
- Relocation of the Valhalla intersection to align with the Camp Richardson Corral entrance road (**C1**)
- Rerouting of the roadways to create a loop connecting all parking areas (**C3**). The loop would be located to the south of the existing historic roadway (the gravel road that runs diagonally through the site from northwest to southeast and is known as Yank Clements road).

- Repair/widening of the roads to prevent off-pavement traffic
- Replacement of entry gates and pathways to meet accessibility standards
- Installation of a turn-around on each end of the loop road, as well as at the entrance to the Valhalla parking lot.

Construction of 90 parking spaces at the Tallac parking area (to include parking for up to 24 extended-length vehicles) in a new parking lot along the new circulation road (D) or incorporated into a re-design of the existing parking area. Related features include:

- Construction of a sidewalk to connect the new parking lot to the existing pedestrian circulation paths.
- Removal of small sections of curbing (curb cuts) in the Tallac parking lot to allow the storm water to flow off the pavement into infiltration basins.

Construction of 45 additional parking spaces at the Valhalla parking area. (E)

Reconfiguration of the volunteer RV campground at the Baldwin Trailer Site (F)including:

- Construct 15 additional campsite spurs (maximum 60' long x 20' wide) and associated circulation routes
- Upgrade existing campsite spurs to meet accessibility standards
- Provide sewer, water, and electrical hookups to each campsite
- Renovate/replace the existing campground support building and needed support facilities
- The existing RV campground area within the Historic Site would remain unimproved with the exception of stormwater BMPs.

Installation/repair of vehicle and pedestrian barriers where appropriate.

Formalize and pave the existing unimproved parking area near the Valhalla entrance on SR 89 to complement the proposed Caltrans improvements (G) including:

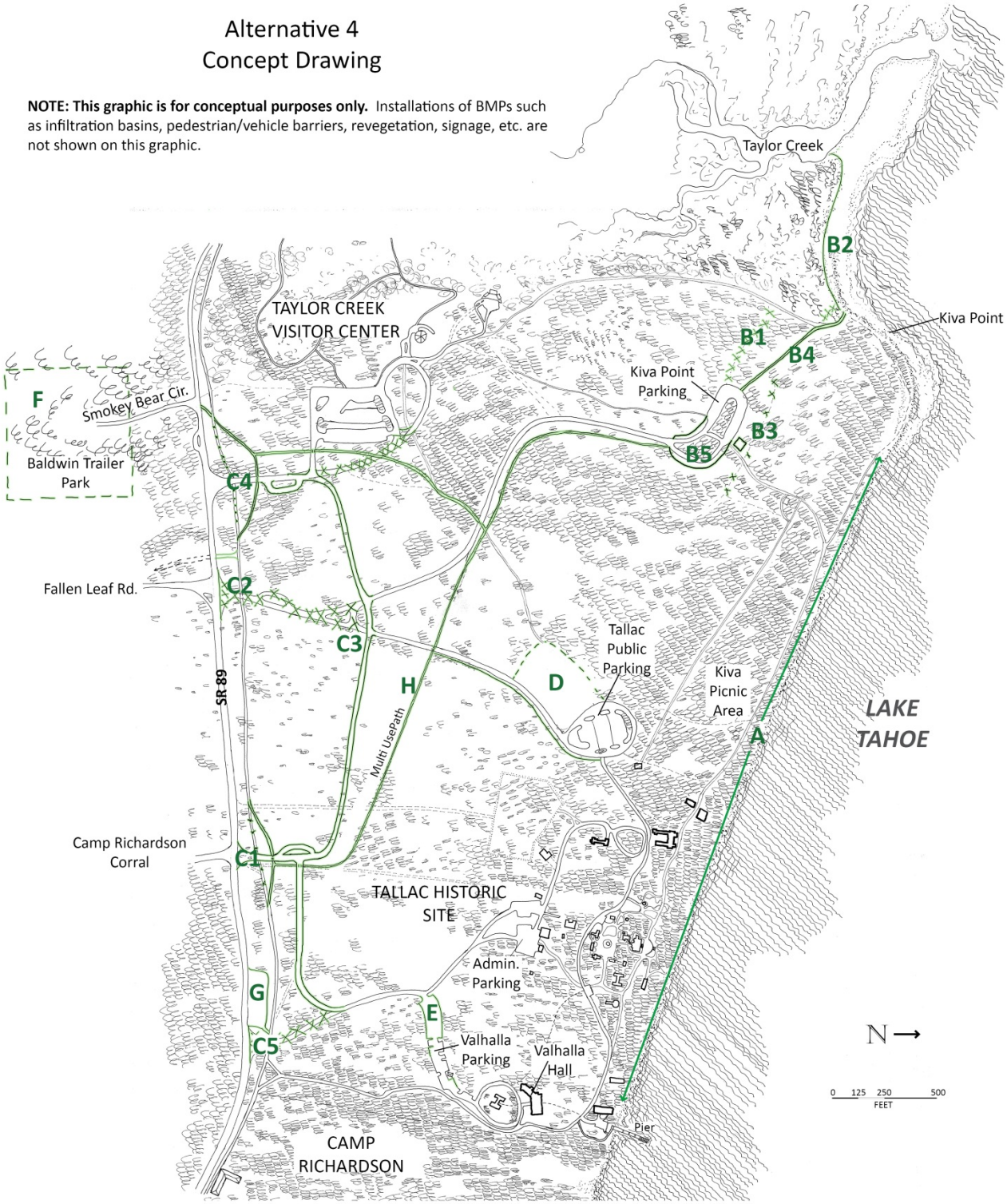
- Connecting the parking area to the existing bike path via a paved walkway.

Installation of Class I multi-use trails adjacent (but along a separate alignment) to the new loop road and parking lot access roads. The trails would utilize portions of historic road footprints.

Reconfiguration/renovation of existing pedestrian pathways to meet accessibility guidelines and existing use levels.

Removal of trees associated with implementation of the project elements described above.

Revegetation of project-related disturbance areas with seeds of native plant species


Alternative 4
Concept Drawing
NOTE: This graphic is for conceptual purposes only. Installations of BMPs such as infiltration basins, pedestrian/vehicle barriers, revegetation, signage, etc. are not shown on this graphic.
Taylor Creek
B2
Kiva Point
TAYLOR CREEK
VISITOR CENTER
B1
B4
Kiva Point
Parking
F
Smokey Bear Cir.
B3
B5
Baldwin Trailer
Park
C4
Fallen Leaf Rd.
C2
C3
Tallac
Public
Parking
D
H
Kiva
Picnic
Area
SR 89
Multi UsePath
A
LAKE
TAHOE
Camp Richardson
Corral
C1
TALLAC HISTORIC
SITE
Admin.
Parking
G
E
C5
Valhalla
Parking
Valhalla
Hall
N
0 125 250 500
FEET
Pier
CAMP
RICHARDSON

DECISION RATIONALE

I have decided to implement Alternative 4 for the following reasons:

1. **It is fully responsive to the Purpose and Need (EA, Section 1.5).**
2. **The selected alternative meets the desired conditions (EA, Section 1.4).**
3. **The selected alternative provides a comprehensive, rigorous, and thorough set of project design features and Best Management Practices (see Appendix A) that are specifically designed to minimize adverse environmental effects.** These measures have been demonstrated to be effective in mitigating effects. The selected alternative and the design features and BMPs reflect a cooperative effort by the Forest Service, other public agencies, and interested publics as to the appropriate actions to be taken in order to meet the need for action.
4. **The selected alternative best balances the social and environmental concerns regarding the public's concerns with the Proposed Action and the need to upgrade facilities.**

   I heard concerns regarding historic resource management; circulation, traffic flow and congestion; managed parking; winter parking and restroom facilities; the appropriate location for volunteer camping, and issues relating to appropriate uses within the historic site. Below these issues have been grouped and the decision rationale regarding each issue follows.

ISSUE: NEED FOR CIRCULATION CHANGES

I received many comments questioning the need for circulation changes within the THS. One of the goals of the project is to improve circulation and connectivity within the site, as well as to reduce congestion on SR 89. Preliminary traffic analysis indicated that the removal of one of the entrances on SR 89 would reduce congestion along the highway corridor. Alternatives that did not remove one of the entrances along SR 89 did not provide a measurable improvement in congestion on the highway. Reducing the entrances from 3 to 2 may increase the relative wait times of the vehicles exiting the site, however this was outweighed by the reduction in congestion along the highway corridor, the flexibility of the loop road for management of the site, the ability of vehicles to utilize an alternate exit if one is obstructed, improvement in circulation and connectivity within the site, as well as improving the traffic Level Of Service (LOS) at Fallen Leaf Road. The overall result of Alternative 4 will be a more unified site that allows visitors to enter and visit all of the site elements without the need to re-enter SR 89. Alternative 3 only provided a few of these benefits (reduced congestion along SR 89 and a small improvement in connectivity within the site) at a much more significant cost to LOS level within the site.

Suggestions to better utilize the existing entrances also did not meet the goal of increasing the unification of the site (see the analysis of Alternative 1 in section 3.3.2). Other suggestions

included creating short connecting roads from the Administrative parking lot to the Tallac Public Parking Lot (immediately adjacent to the volunteer RV lot) and from the Kiva Point Parking lot road to the Visitor Center parking lot (Section 2.7 Alternatives not analyzed in further detail). While these connecting roads would require a smaller amount of new road, the proposed roads would adversely affect the historic character of the site due to the immediate proximity to historic buildings, require significant changes to the management of the site (visitors would now be traveling through an area that was previously used primarily by employees and volunteers only), would not result in improved travel along SR 89, and would not meet the goal of providing intuitive circulation within the site.

ISSUE: IMPACTS TO THE HISTORIC CHARACTER FROM THE LOOP ROAD

There was considerable public comment regarding the impact of the proposed loop road in Alternative 2 on the historic character of the site. As a result of these comments, additional visual, noise, and heritage impacts from the loop road were analyzed. Although the analysis still indicated that the loop road would not have an adverse effect on the character and eligibility of the site on the National Register of Historic Places, I understand that there is a deeply personal connection to this historic site by visitors and locals alike that is not easily characterized through these metrics. As such, I directed the creation of a fourth alternative that moves the loop road closer to SR89. Alternative 4 increases the buffer to the historic buildings over Alternative 2, but still provides the connectivity and circulation improvements that could be achieved by the loop road in that alternative.

ISSUE: IMPACTS TO THE HISTORIC CHARACTER FROM IMPROVING THE VOLUNTEER RV LOT WITHIN HISTORIC SITE

Issues regarding upgrading the volunteer RV lot within the historic site were raised, both in regards to the appropriateness of the activity in the proposed location, as well as to its possible impact to the historic character of the site. Of all the project elements, this feature provided the most concern for the historic architect that completed additional heritage analysis, the Pacific Southwest Regional Office heritage representative (Forest Service Region 5), and LTBMU staff. Given that the Baldwin Trailer Park is located directly across SR 89, provides a “private” camping opportunity for the volunteers, already has considerable existing infrastructure, would require less work to upgrade, and would not affect the historic character of the THS, I made the decision to complete volunteer camping upgrades at the Baldwin Trailer Park area and not to improve the volunteer RV lot within the historic site. The improved non-vehicular circulation routes in Alternative 4 will provide an easier and safer route for volunteers from the Baldwin Trailer Park to the THS compared to the existing condition.

ISSUE: SUGGESTIONS REGARDING REDUCING ACCESS AND PARKING AS A WAY TO MANAGE IMPACTS TO THE SITE

I received several comments questioning the need to provide vehicular access for visitors to the site, as well as suggestions that reducing access could be a way to manage impacts to the site. While it is a goal of the LTBMU to encourage alternative transportation, eliminating vehicular access and parking without first having a functioning public transportation or shuttle system would further encourage "creative" parking by visitors that often results in parking on non-paved surfaces (creating dust and fine particles which impact air quality and the water quality of Lake Tahoe), as well as trampling of vegetation and general confusion amongst visitors. Reducing managed access to the site also raises concerns regarding social justice and access to public lands. Improving the alternative transportation system is outside the scope of this project. Therefore alternatives that further reduced access and parking over existing were not analyzed further. As a result of these comments, however, the proposed additional parking at the Tallac Public Parking lot was reduced to 90 additional spaces (Alternative 2 proposed 120 additional, Alternative 3 proposed 100 additional). The loop road also provides the most flexibility and efficiency for alternative transportation options in the future, as well. For example, the loop facilitates a very limited stop transportation system (i.e. one stop along the loop road where everyone exits and accesses the individual areas of the site on pedestrian pathways), but it also facilitates a system where Valhalla, the THS, and the Visitor Center all have their own stop (i.e. doesn't require the vehicle to enter and exit SR 89 multiple times in order to access each area of the site).

Changing the "preferred management clientele" of areas such as Tallac Point Beach (aka Kiva Point Beach) and Kiva Beach as a way to manage impacts to the site was also suggested during the comment period. The Forest Service does not manage its sites for a "preferred management clientele". All people (visitors and locals alike) have equal rights of access to public lands managed by the Forest Service. Therefore suggestions to keep the site separated by use and client type were not analyzed further.

ISSUE: WINTER USE OF THE THS

There were public comments regarding winter use at of the THS. In general, plowing of roads for winter access is considered a management decision. The document addresses impacts related to winter access. Since there were public comments regarding this subject, I would like to further elaborate here. Within the Lake Tahoe Basin, TRPA has ordinances related to snow removal and storage (TRPA Code of Ordinances 60.1.4). Any snow removal activities in the future would meet these requirements. As a general statement, any surface that is paved can be plowed for snow removal activities. So while the EA does not describe snow removal, any paved surface could be considered in the future for snow removal activities, as long as BMPs are in place to manage storm water runoff. In making my decision about the roadway configuration, I did take into consideration the flexibility of the different alternatives for snow removal activities in the winter months. Alternatives with a loop road (Alt 2 and 4) offer the greatest flexibility for snow removal operations in the future. It is my goal to develop a snow removal plan that better serves the recreating public in the future.

Similar to snow removal activities, the use of a restroom during winter months is considered. The main issue with the use of restrooms during winter months is freezing of the pipes and maintenance of the facility. Design and programming to address these issues are driven by budgetary limitations and not by environmental effects. Decisions regarding the need for winter use of the building will be made at the time when funding for the restroom facility becomes available. I will take into consideration the public comment received on this issue at that time.

ALTERNATIVES CONSIDERED

In addition to the selected alternative (Alternative 4), I also considered the following alternatives in detail:

No Action: Under this alternative, no improvements would be made and the existing facilities and management would remain unchanged.

Alternative 2: the Proposed Action: This alternative was circulated during project scoping and includes water quality and circulation improvements.

Alternative 3: This alternative is designed to respond to public concerns identified during project scoping.

ALTERNATIVES CONSIDERED BUT NOT IN DETAIL

In addition to those alternatives considered in detail, commenters had several suggestions for alternatives to the Proposed Action. Several of these suggestions were considered but not developed for detailed analysis. Section 2.7 of the EA describes these alternatives.

PUBLIC INVOLVEMENT

During preliminary review of the project with Forest Service personnel and with other interested agencies and stakeholders, several concerns were identified and were addressed in the final Proposed Action that was part of the formal scoping process. These preliminary concerns included:

- **The presence of noxious weeds within the project area.** Design features will be implemented to prevent the spread of these plants during project construction.
- **Known locations of heritage resource sites should be protected.** While working with the setting of the site's National Register of Historic Properties listing, retrofit improvements will avoid the degradation of features that contribute to the site's recognized historic values.
- **The need for water quality protection BMPs to address fine particles that could affect Lake Tahoe's water clarity.** The final Proposed Action provides extensive BMPs that apply to the design, implementation, and operational phases of the project in order

to ensure that benefits to water quality continue to accrue over time.

This project was first listed on the LTBMU's Schedule of Proposed Actions (SOPA) in January 2011, providing internet notice to the public and interested stakeholders of general project intent and schedule. The formal NEPA scoping occurred in September 2012, with letters being sent to interested and affected stakeholders describing the Need for Change and Proposed Action. These letters, along with postings on the LTBMU website requested input on the Proposed Action and identification of concerns or information the LTBMU may not be aware of that would affect project development. Additionally, a display that included the proposed action was placed at the Baldwin Museum (inside the Tallac Historic Site) during the scoping period, and comment cards were available for visitors to provide comments on the project. During the project scoping period 28 letters or messages were received.

The proposed action was refined (see Section 2.2) and a new alternative 3 was added in response to public comment. The EA was released for the 30-day public comment period on March 7, 2014 with a legal notice in the Tahoe Daily Tribune. Additionally, the public comment period was highlighted in the following news outlets:

> "Input on Tallac Historic Site changes sought" *Mountain News* March 2014 issue.
> "Forest Service seeks comments on Tallac Historic Site Project" *Tahoechamber.org* March 7, 2014
> "Project designed to improve flow at Tallac Site" *Lake Tahoe News* March 17, 2014
> "Forest Service seeks comments on Tallac Historic site project" *Tahoe Daily Tribune* March 14, 2014

Individual letters were sent to all of the individuals on the original scoping list, as well as any individuals who provided comments during scoping to notify them of the EA comment period. A total of 41 comment letters were received during the public comment period that ended April 7, 2014. These comments helped to inform the refinement of the EA analysis and the development of Alternative 4. The comments and responses to them are included in Appendix C of this document.

FINDING OF NO SIGNIFICANT IMPACT

After considering the environmental effects described in the EA, I have determined that these actions will not have a significant effect on the quality of the human environment considering the context and intensity of impacts (40 CFR 1508.27). Thus, an environmental impact statement will not be prepared. I base my finding on the following:

1. **Beneficial and adverse impacts –** My finding of no significant environmental effects is not biased by the beneficial effects of the action (EA, Chapter 3). Design features and BMPs implemented will mitigate effects to less than significant levels (Appendix A and B of this document).

2. **The degree to which the proposed action affects public health or safety –** There will be no significant effects on public health and safety, and design features address public health and safety. The project involves routine work that has occurred and continues to occur within and near the project area. Signs will be used warning public users of project activities such as vehicles using the road, vegetation cutting, and equipment usage. A short-term Forest Order closing a portion of the project area during implementation could occur depending upon visitor use and the timing of implementation activities.
3. **Unique characteristics of the geographic area –** The project area includes forested areas and shore zone areas which are considered common characteristics of the geographic area adjacent to Lake Tahoe. There will be no significant effects on the forest and shore zone environments or on Lake Tahoe (EA, Chapter 3).
4. **The degree of controversy over environmental effects –** Public involvement with interested and affected individuals and agencies throughout the environmental analysis identified concerns regarding the environmental effects of implementing the proposed actions, particularly with regard to preserving the site's historic values. The EA adequately addresses these concerns and discloses the environmental effects.
5. **The degree to which the possible effects on the human environment are highly uncertain or involves unique or unknown risks –** The LTBMU has considerable experience and success with the types of activities to be implemented. The effects analysis in the EA shows the effects are not uncertain, and do not involve unique or unknown risk (EA, Chapter 3).
6. **The degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration.** The action will not establish a precedent for future actions with significant effects. No significant effects are identified (EA, Chapter 3), nor does this action influence a decision in principle about any future considerations.
7. **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts –** There are no known significant cumulative effects between this project and other ongoing or planned projects in or adjacent to this project. The effects of other foreseeable future actions as well as past actions and ongoing actions were included in the analysis (EA, Chapter 3).
8. **The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places, or may cause loss or destruction of significant scientific, cultural, or historical resources** – Although the project area encompasses the Tallac Historic Site, which includes properties eligible for listing on the National Register of Historic Properties, the action will have no adverse effect on districts, sites, highways,

structures, or objects listed in or eligible for listing in the National Register of Historic Properties. Consultation with the California State Historic Preservation Officer regarding the determination of effects will be concluded with formal concurrence prior to a final decision on the project and Project.

9. **The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973** – The action will have no negative effect on any endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973. No federally-listed endangered or proposed species or critical habitat were identified by the US Fish and Wildlife Service (FWS) within the analysis area. The project BE/BAs determined no proposed or designated critical habitat exists in or near the project action area (EA, Sections 3.4 and 3.5).
10. **Whether the action threatens a violation of Federal, State, or local law or other requirements imposed for the protection of the environment** – The action will not violate Federal, State, and local laws or requirements for the protection of the environment. Applicable laws and regulations were considered in the EA (EA, Section 1.10). The action was designed to be consistent with the LTBMU LRMP (EA Section 1.10; Project Record Document A-1).

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

National Forest Management Act

This Act requires the development of long-range land and resource management plans. The LTBMU LRMP was approved in 1988 as required by this Act. It has been amended several times, including the Sierra Nevada Forest Plan Amendment, (2004). The LRMP provides guidance for all natural resource management activities on National Forest System lands in the Lake Tahoe Basin. The Act requires all projects and activities are consistent with the LRMP. The LRMP has been reviewed in consideration of this project. I find that this decision is consistent with the Lake Tahoe Basin LTBMU Land and Resource Management Plan (LRMP). The consistency check is documented in the project planning record (Project Record Document A-1).

Endangered Species Act

I find that this decision is consistent with Section 7(c) of the Endangered Species Act, the United States Fish and Wildlife Service list of "endangered and threatened species that may be affected by Projects in the Lake Tahoe Basin Management Area" (updated on September 18, 2011). The list was reviewed and verified (Project Record Document G-1 and G-4). The action will have a "no effect" on any endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

National Historic Preservation Act

I find that this decision is consistent with Section 106 of the National Historic Preservation Act, which requires federal agencies to take into account the effect of a project on any district, site, building, structure, or object that is included in, or eligible for inclusion in the National Register. Section 106 of the National Historic Preservation Act (NHPA) requires federal agencies to take into account the effect of a project on any district, site, building, structure, or object that is included in, or eligible for inclusion in, the National Register of Historic Places. Section 106 of the NHPA (Public Law 89.665, as amended) also requires federal agencies to afford the State Historic Preservation Officer a reasonable opportunity to comment. Consultation with the State Historic Preservation Officer will be complete prior to a final decision regarding the determination that there would be no adverse effect on the eligible properties from the project. No other cultural sites or archaeological sites outside of the project area would be affected.

Clean Water Act (Public Law 92-500)

I find that this decision is consistent with the Clean Water Act, which requires all Federal agencies to comply with the provisions of the Clean Water Act. The Clean Water Act regulates forest management activities near federal waters and riparian areas. I find that the Best Management Practices (Appendix B) and project design features (Appendix A) associated with this decision will ensure that the terms of the Clean Water Act are met.

Clean Air Act (Public Law 84-159)

I find that this decision is consistent with the Clean Air Act. The project area lies within the Lake Tahoe Air Basin and the El Dorado Air Quality Management District. The project is not expected to generate additional vehicle trips to the Lake Tahoe Basin. In addition, project design features (Appendix A) provide for the control of fugitive dust associated with the implementation of the project.

Environmental Justice (Executive Order 12898)

I find that this decision is consistent with Executive Order 12898, which requires that all federal actions consider potentially disproportionate effects on minority and low-income communities, especially if adverse effects to environmental or human health conditions are identified. Analysis determined that there would be no adverse environmental or human health conditions created by any of the alternatives considered that would affect any minority or low-income neighborhood disproportionately.

The activities proposed in all alternatives were based solely on the existing and desired conditions of the project site, sensitivity of the environment, and practical treatment access in response to the purpose and need. In no cases were the proposed activities based on the demographic makeup, occupancy, property value, income level, or any other criteria reflecting the status of adjacent non-federal land. Reviewing the location of the proposed treatments in any of the alternatives in relationship to non-federal land, there is no

evidence to suggest that any minority or low-income neighborhood would be affected disproportionately. Conversely, there is no evidence that any individual, group, or portion of the community would benefit unequally from any of the actions in the proposed alternatives.

Migratory Bird Treaty Act of 1918 as amended (16 USC 703-712)

I find that this decision is consistent with the Migratory Bird Treaty Act. The original 1918 statute implemented the 1916 Convention between the United States and Great Britain (for Canada) for the protection of migratory birds. Later amendments implemented treaties between the United States and Mexico, Japan, and the Soviet Union (now Russia). Specific provisions in the statute include the establishment of a federal prohibition, unless permitted by regulations, to "pursue, hunt, take, capture, kill, attempt to take, capture or kill, possess, offer for sale, sell, offer to purchase, purchase, deliver for shipment, ship, cause to be shipped, deliver for transportation, transport, cause to be transported, carry, or cause to be carried by any means whatever, receive for shipment, transportation or carriage, or export, at any time, or in any manner, any migratory bird, included in the terms of this Convention…for the protection of migratory birds…or any part, nest, or egg of any such bird." Because forestlands provide a substantial portion of breeding habitat, land management activities within the LTBMU can have an impact on local populations. The project would not adversely impact any populations or habitat of migratory birds (Project Record Documents G-5).

Invasive Species, Executive Order 13112 of February 3, 1999

I find that this decision is consistent with Executive Order 13112. The EA covers botanical resources and noxious weeds. The project's design features are designed to minimize risk of new weed introductions (Project Record Document G-3).

Recreational Fisheries, Executive Order 12962 of June 6, 1995

I find that this decision is consistent with Executive Oder 12962. The effects to fish habitat from the project are expected to be positive, as reductions in potential sedimentation and impervious surfaces will reduce the current impacts to the project site and to the adjacent streamside environment zone (Project Record Document G-4).

Architectural Barriers Act

I find that this decision is consistent with the Architectural Barriers Act (ABA), which requires that facilities designed, built, altered, or leased with funds supplied by the United States federal government be accessible to the public. The ABA provides uniform standards for the design, construction, and alteration of buildings so that persons with disabilities will have ready access to and use of them. These standards have been incorporated into the design of this project.

Floodplain Management, Executive Order 11988 of May 24, 1977, and Protection of

Wetlands, Executive Order 11990 of May 24, 1977

I find that this decision is consistent with Executive Orders 11988 and 11990.These executive orders provide for protection and management of floodplains and wetlands. Compliance with these orders will be ensured by adhering to the project design features, including the implementation of BMPs (Appendix A).

Special Area Designations

There are no specially designated areas that would be affected by the Project (e.g., Research Natural Areas, Inventoried Roadless Areas, Wilderness Areas, and Wild and Scenic Rivers).

Tahoe Regional Planning Agency

I find that this project will be consistent with requirements associated with TRPA. This project will be reviewed by TRPA consistent with the terms of the 1989 MOU between TRPA and the Forest Service. Depending on the extent of implementation phases, project permits may be required.

Local Agency Permitting Requirements and Coordination

I find that this project will comply with all local agency permitting requirements. This finding is based upon the past record of the LTBMU working closely with all local agencies to ensure proper permitting of projects. There would be no planned ground-disturbing project activities that occur between October 15 and May 1. In the event that circumstances require resource protection work during this period a grading exemption from TRPA and Lahontan Water Board would be required. In addition, any required permits will be obtained from TRPA and/or the Lahontan Water Board prior to project implementation. Appropriate permits will be obtained with Caltrans prior to implementation affecting the right-of-way along Highway 89.

Implementation Date

If an objection to this draft decision is filed, implementation may occur on, but not before fifteen business days from the date of objection resolution and issuance of a final decision. If no objection is filed, implementation may begin five business days from the close of the objection period and issuance of a final decision.

Administrative Review or Objection Opportunities

This proposed decision is subject to objection pursuant to 36 CFR 218, Subparts A and B. Objections will only be accepted from those who submitted project-specific written comments during scoping or other designated comment period. Issues raised in objections must be based on previously submitted comments unless based on new information arising after the designated

comment period(s).

Objections must be submitted within 45 days following the publication of this legal notice in the *Tahoe Daily Tribune*. The date of this legal notice is the exclusive means for calculating the time to file an objection. Those wishing to object should not rely upon dates or timeframes provided by any other source. It is the objector's responsibility to ensure evidence of timely receipt (36 CFR 218.9).

Objections must be submitted to the reviewing officer: Randy Moore, Regional Forester, USDA Forest Service; Attn: Historic Facilities BMP Retrofit; 1323 Club Drive, Vallejo, CA 94592. Phone (707) 562-8737. Objections may be submitted via mail, FAX (707-562-9229), or delivered during business hours (M-F 8:00am to 4:00pm). Electronic objections, in common (.doc, .pdf, .rtf, .txt) formats, may be submitted to: objections-pacificsouthwest-regional-office@fs.fed.us with Subject: Historic Facilities BMP Retrofit. In cases where no identifiable name is attached to an electronic message, a verification of identity will be required. A scanned signature is one way to provide verification.

Objections must include (36 CFR 218.8(d)): 1) name, address and telephone; 2) signature or other verification of authorship; 3) identify a single lead objector when applicable; 4) project name, Responsible Official name and title, and name of affected National Forest(s) and/or Ranger District(s); 5) reasons for, and suggested remedies to resolve, your objections; and, 6) description of the connection between your objections and your prior comments. Incorporate documents by reference only as provided for at 36 CFR 218.8(b).

CONTACT

For additional information concerning this draft decision or the Forest Service objection process, contact:

Ashley Sommer, Lake Tahoe Basin Management Unit
35 College Drive
South Lake Tahoe, CA 96150
Phone (530)543-2600, Fax (530)543-2693

_____ _____

NANCY J. GIBSON **DATE**

Forest Supervisor
Lake Tahoe Basin Management Unit

Appendices:

Appendix A – Project Design Features

Appendix B – BMP's

Appendix C – Response to Comments

The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs and activities on the basis of race, color, national origin, age, disability, and where applicable, sex, marital status, familial status, parental status, religion, sexual orientation, genetic information, political beliefs, reprisal, or because all or part of an individual's income is derived from any public assistance program. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at (202) 720-2600 (voice and TDD). To file a complaint of discrimination, write to USDA, Director, Office of Civil Rights, 1400 Independence Avenue, S.W., Washington, D.C. 20250-9410, or call (800) 795-3272 (voice) or (202) 720-6382 (TDD). USDA is an equal opportunity provider and employer.

APPENDIX A: PROJECT DESIGN FEATURES

The project direction from the Forest Supervisor was for the interdisciplinary team to prevent negative effects up-front, rather than include mitigation measures to correct effects after they occur. These prevention measures are termed "design features" because they are part of the design of the project to minimize or prevent negative environmental effects.

Project design features were also developed in response to community input during scoping and interdisciplinary team discussion and analysis. Project design features are elements of the project design that ensure consistency with the Forest Plan. These features are included as part of the selected alternative based upon past experience with similar projects in the Lake Tahoe Basin area and have been proven to be effective based on monitoring and professional observations.

In addition to the following design features, applicable BMPs are identified in *Water Quality Management for Forest System Lands in California* (USDA Forest Service 2000a). Adherence to these BMPs ensures compliance with the Clean Water Act. These specific BMPs are listed in Appendix A. Detailed specification for these BMPs would be incorporated into the final design plans and SWPPP (Storm Water Pollution Prevention Plan) which would be approved by the Lahontan Regional Water Quality Control Board prior to issuance of a project permit.

Air Quality

AIR-1 The project would include standard dust control measures as part of its compliance with local air quality protection regulations.

AIR-2 Water all exposed stockpiled materials (soils, mulch) during construction to avoid dry material conditions that may be prone to wind erosion during storage. Cover exposed stockpiled materials between periods of active construction to prevent wind and water erosion.

AIR-3 Prohibit vegetative slash and construction burning.

Botany

Special Status Species

BOT-1 ***ERIOGONUM LUTEOLUM VAR. SALTUARIUM (GOLDENCARPET BUCKWHEAT)*** No plants were found during botanical surveys for the proposed project. If any plants are found prior to or during project implementation, resource protection measures will be implemented to ensure their full protection. Measures may include, but are not limited to, flagging, buffering, and avoiding the populations. There will be

an amendment to the project file documenting any new Threatened, Endangered, Sensitive, or Proposed (TESP) plant occurrences.

BOT-2 ***RORIPPA SUBUMBELLATA (TAHOE YELLOW CRESS)*** No plants were found during botanical surveys for the proposed project. If any plants are found prior to or during project implementation, resource protection measures will be implemented to ensure their full protection. Measures may include, but are not limited to, flagging, buffering, and avoiding the populations. There will be an amendment to the project file documenting any new TESP plant occurrences.

INVASIVE PLANTS

BOT-3 The project would include standard protection measures in accordance with the USDA Invasive Species Management direction (FSM 2900), the USDA Forest Service Pacific Southwest Region Noxious Weed Management Strategy (August 4, 2000), and the Lake Tahoe Basin Weed Coordinating Group (LTBWCG) Strategic Plan (*March 13, 2003; amended March 22, 2006*).

BOT-4 Noxious weed surveys for the proposed project were completed, and several noxious weed infestations were identified (as defined in the Sierra Nevada Forest Plan Amendment, part 3.6). The following species require control or treatment within the project area:

Cheatgrass (*Bromus tectorum*): Several areas within the project area are infested with cheatgrass. Due to the large distribution of cheatgrass, an inventory of occurrences cannot be reasonably maintained. Therefore, cheatgrass mitigations are provided on an infestation-by-infestation basis. At least two weeks prior to implementation, the project leader will discuss site-specific cheatgrass mitigation options with the Forest Botanist or their appointed representative. In general, infestations less than 50 square feet in size will be treated; treatment options include, but are not limited to, hand pulling and bagging the plants. Larger cheat grass infestations (> ~50 square feet) will be avoided as much as feasible. When working in cheatgrass-infested areas, vehicles, equipment, and clothing/shoes will be cleaned before moving to non-infested areas.

Bull thistle (*Cirsium vulgare*): Bull thistle is known to occur at ten sites within the project area (CIVU 136C, 137A, 201, 202, 203A, 216, 313B, 362A, 814, and 820). Bull thistle will be treated at least one week prior to project implementation. Treatment options include, but are not limited to, manual removal by a) digging out as much of the root as possible and either bagging the plant or laying it out where the roots will not be in contact with the ground; and b) if in bud or flowering, clipping and bagging all buds and flowers.

Scotch broom (*Cytisus scoparius*): Scotch broom is known to occur at one site within the project area (CYSC 748). This site will be treated at least one week

prior to project implementation. Treatment options include, but are not limited to, manual removal by a) digging out as much of the root as possible and either bagging the plant or laying it out where the roots will not be in contact with the ground; and b) if fruiting or seeding, clipping and bagging all fruits.

Perennial pepperweed (*Lepidium latifolium*): Perennial pepperweed is known to occur at one site within the project area (LELA 136A). Perennial pepperweed will be treated at least one week prior to project implementation. Treatment options include but are not limited to chemical treatment, where feasible, and manual treatment. If treatment is not feasible, the infestation will be flagged and all project activities will be prohibited within the control area. At least one month prior to implementation, the project leader will discuss site-specific mitigation options with the Forest Botanist or their appointed representative.

Oxeye daisy (*Leucanthemum vulgare*): Oxeye daisy is known to occur at five sites within the project area (LEVU 136B, 137B, 203B, 362B, and 610). These sites will be treated at least one week prior to project implementation. Treatment options include but are not limited to chemical treatment, where feasible, and manual treatment. If treatment is not feasible, the infestation will be flagged and all project activities will be prohibited within the control area. At least one month prior to implementation, the project leader will discuss site-specific mitigation options with the Forest Botanist or their appointed representative.

Yellow toadflax (*Linaria vulgaris*): Yellow toadflax is known to occur at three sites within the project area (LIVU 281, 365, and 434). These sites will be treated at least one week prior to project implementation. Treatment options include but are not limited to chemical treatment, where feasible, and manual treatment. If treatment is not feasible, the infestation will be flagged and all project activities will be prohibited within the control area. At least one month prior to implementation, the project leader will discuss site-specific mitigation options with the Forest Botanist or their appointed representative.

Heritage Resources

The project would include requirements outlined in Section 106 of the National Historic Preservation Act of 1966 (NHPA) (36 CFR Part 800). In addition:

HR-1 Flag and avoid known Washoe heritage sites.

HR-2 Provide advanced notice to Washoe Tribal site monitors to observe ground disturbing activities, including trenching and tree stump removal at specified locations.

HR-3 If previously unidentified archeological deposits are discovered during project implementation, ground disturbing activities will stop and the LTBMU

archaeologist will be notified. Project activities will not proceed until 36 CFR 800 requirements have been fulfilled.

HR-4 Protect historic landscape features including horticultural features during project activities. If implementation of needed BMPs cannot avoid these features, they will be replaced following implementation.

Recreation

REC-1 Prepare a traffic safety and control plan prior to commencing project implementation. The plan will provide for public safety on Forest Service controlled roads and trails open to public travel.

REC-2 Provide advanced notice to the public and area permittees to ensure that they are aware of proposed project activity, including tree removal. Post signs in project areas near public access points to highlight the proposed action and impacts to public access.

REC-3 Maintain recreational facilities in a usable condition to the extent possible as long as human health and safety is not compromised and project implementation is unimpeded.

REC-4 Initiate temporary forest closure only during the project activity period to ensure public safety. Closure should be as limited as possible to reduce restrictions to public access.

REC-5 Include design parameters for the Camp Richardson Corral vehicles (horse-drawn sleigh and wagon) along their permitted route. This may include curb cuts, removal of barriers within the needed vehicle turning radii, or other design features to allow for safe and clear passage of approved vehicles during all seasons.

Soil and Water

The project would include standard protection measures in accordance with the Forest Service publication Water Quality Management for National Forest System Lands in California (USDA Forest Service 2011). In addition:

SOI-1 During and after periods of inclement weather, consult with an LTBMU hydrologist to determine if soil conditions are sufficiently dry and stable to allow construction to continue without the threat of substantial erosion, sedimentation, or offsite sediment transport.

SOI-2 Restore areas disturbed during construction activities after construction has ended (such as staging areas and access road footprints). Restoration could include decompacting soil and/or mulching (BMP 2-2).

SOI-3 Staging of materials and equipment will be limited to existing disturbed areas (where soils are already compacted and vegetation has been cleared). No new disturbance will be created for staging and stockpile areas.

Wildlife

The project would include standard protection measures in accordance with Section 7(c) of the Endangered Species Act. In addition:

WILD-1 Limited operating periods (LOPs) restrict the type, spatial extent, and timing of project activities to minimize disturbance to breeding pairs. If special status species are detected in the project vicinity, LOPs would be implemented as determined by the project biologist. LOPs are based on habitat suitability or the most current wildlife data. (LTBMU LRMP S&G page IV-26, IV-27, Forest Order 19-86-99; SNFPA 2004 S&G 57, 62, 75, 76, 77, 78, 79, 83, 85, 88; TRPA Code chapter 78).

WILD-2 Any sightings of threatened, endangered, candidate, proposed, or sensitive species would be reported to the project biologist. Nests and dens would be protected with flagging, fencing, or LOPs in accordance with management direction. Species identification, known locations, and protection procedures would be addressed with implementation crews during a pre-construction tailgate meeting.

WILD-3 Snags would be retained for wildlife unless deemed a hazard tree (LTBMU LRMP IV26, SNFPA ROD 51.11, TRPA Code 78.2D).

WILD-4 Existing downed logs greater than 20 inches dbh would be retained. Logs moved during construction would be repositioned. Preference would be given to snags that have to be felled for public safety, then to the largest logs available in a variety of decay stages for wildlife habitat (LTBMU LRMP IV-26, SNFPA ROD 51.10, 51.11, TRPA Code 78.2D).

WILD-5 Bear proof garbage dumpsters would be temporarily installed during implementation, or food related trash would be removed daily to avoid attracting wildlife to the project area.

WILD-6 Removal of larger trees, as required for installation of BMPs, would be minimized. Tree health, vigor, and evidence of disease and insect infestation would be factors for determining tree retention, followed by species preference. Species retention preference would be given to large cedars, then pines, and then firs.

Monitoring

The following is a preliminary list of monitoring items that would be carried forward as a part of the project implementation.

- The Historic Facilities BMP Retrofit project would be included in the pool of projects for random BMP evaluations under the Best Management Practices Evaluation Program (BMPEP) program. Each year the LTBMU completes evaluations for the BMPEP as part of the Pacific Southwest Region's effort to evaluate the implementation and effectiveness of BMPs created for protecting soil and water resources associated with Forest Service management activities.

- Monitoring to ensure that all contract items including temporary BMPs, design features, and permit requirements are being followed, will be provided by the Forest Service Contracting Officer's Representative following protocols established for public works contract administration.

APPENDIX B: BEST MANAGEMENT PRACTICES

This document discusses the applicable best management practices (BMPs) for the proposed action's design features. Details are provided for application of the BMPs. These BMPs are designed to reduce or eliminate direct, indirect, and cumulative impacts to soil and hydrologic conditions and to reduce potential impacts (nutrient and sediment loads, affecting lake clarity) to Lake Tahoe, a unique national feature. Actual application of these BMPs are based on the proposed action and integration (further refinement) with project design features (EA, Section 2.3.2). All applicable water quality BMPs would be implemented.

Note: The USFS recently updated the Water Quality Management Handbook (Region 5 FSH 2509.22, Chapter 10), and in turn updated several of the Regional BMPs listed below. These changes primarily affected the Road Building and Site Construction BMPs (BMP numbers 2-1 through 2-26 below) and did not change the intent of the practices, but only revised the numbering system and the descriptions. The new Water Quality Management Handbook will be used for this project and protective measures will be taken to ensure project work complies with required permit conditions including RWQCB Board Order No. R6T-2011-0019, Updated Waste Discharge Requirements and NPDES General Permit No.CAG616002 for Discharges of Storm Water Runoff Associated with Construction Activity Involving Land Disturbance in the Lake Tahoe Hydrologic unit.

Summary of revised BMPs for Road Building and Site Construction from December 2011 Water Quality Management Handbook that apply to this project

PSW Region BMPs	Best Management Practice Description
BMP 2.2: General Guidelines for Location and Design of Roads Replaces former BMP 2-1 and 2-7 National BMP Road-2	Location, design and construction of campground roads will be agreed upon by the IDT in order to result in minimal resource damage. This includes design and location of drainage features and road surfacing.
BMP 2.3: Road Construction and Reconstruction Replaces former BMP 2-3, 2-4, 2-5, 2-6, 2-9, 2-10, 2-11, and 2-13 National BMP Road-2	Temporary road construction and road re-construction activities will be conducted during the dry season, when rain and runoff are unlikely and weather and ground conditions are such that impacts to soils and water quality will be minimal. This also includes construction of drainage structures, erosion control measures on incomplete roads prior to precipitation events, and providing groundcover or mulch on disturbed areas. The contractor shall limit the amount of disturbed area at a site at any one time, and shall minimize the time that an area is left bare.

PSW Region BMPs	Best Management Practice Description
BMP 2.4: Road Maintenance and Operations Replaces former BMP 2-7, 2-22, 2-23, and 2-24 National BMP Road-2	Assess campground road maintenance needs periodically as it relates to water quality effects. Provide the basic maintenance required to protect the road and to ensure that damage to adjacent land and resources is prevented. At a minimum, maintenance must protect drainage structures and runoff patterns. This also includes road surface treatments and drainage structure improvements as needed based on road use.
BMP 2.7: Road Decommissioning National BMP Road-6	Campground roads that are not needed will be stabilized, restored and revegetated in order to protect and enhance NFS lands, resources, and water quality.
BMP 2.8: Stream Crossings Replaces former BMP 2-13, 2-15, 2-17, and 2-20 National BMP Road-2	Crossing locations shall be identified by the IDT to limit the number of crossings to minimize disturbance to the waterbody. During crossing installation, minimize streambank and riparian area excavation, ensure imported fill materials are free of toxins and invasive species, divert streamflow around work site, dewater work areas, and stabilize streambanks and other disturbed surfaces following crossing installation or maintenance. The diverted flows are returned to their natural stream course as soon as possible after construction or prior to seasonal closures. Restore the original surface of the streambed upon completing the crossing construction or maintenance. Provide soil cover on exposed surfaces and revegetate disturbed areas. Remove temporary crossing and restore waterbody profile and substrate when the need for the crossing no longer exists.
BMP 2.10: Parking and Staging Areas New BMP, no former BMP equivalent National BMP Road-9	Construct and maintain an appropriate level of drainage and runoff treatment for parking and staging areas to protect water, aquatic and riparian resources. Infiltrate as much runoff as possible using permeable surfaces and infiltration ditches or basins and limit the size of temporary parking or staging areas. Rehabilitate temporary parking or staging areas immediately following use, including preventing continued access to these areas.
BMP 2.11: Equipment Refueling and Servicing Replaces former BMP 2-12 National BMP Road-10	Service and refueling sites shall be located away from wet areas and surface water. If the volume of stored fuel at a site exceeds 1,320 gallons, project Spill Prevention, Containment, and Counter Measures (SPCC) plans are required. Contractors are required to remove service residues, waste oil, and other materials from National Forest land following completion of the project, and be prepared to take responsive actions in case of a hazardous substance spill, according to the Forest SPCC plan.

PSW Region BMPs	Best Management Practice Description
BMP 2.13: Erosion Control Plan Replaces former BMP 2-2, 2-9, and 2-18 National BMP Fac-2	Effectively plan for erosion control to control or prevent sedimentation. Prior to initiation of construction activities, prepare a general erosion control plan for limiting and mitigating erosion and sedimentation from land disturbing activities. For this project, a Stormwater Pollution Prevention Plan (SWPPP) will be used in place of an Erosion Control Plan per Regional Water Quality Control Board permit requirements. Protective measures will be taken to ensure project work complies with required permit conditions including RWQCB Board Order No. R6T-2011-0019, Updated Waste Discharge Requirements and NPDES General Permit No.CAG616002 for Discharges of Storm Water Runoff Associated with Construction Activity Involving Land Disturbance in the Lake Tahoe Hydrologic unit.
BMP 4.2: Provide Safe Drinking Water Supplies Same National BMP Fac-3	Location, design, sampling and sanitary surveys will be performed by qualified individuals who are familiar with drinking water supply systems and guidelines. Coordination and cooperation will be pursued with State or local Health Department representatives in all phases of drinking water system management. Sampling and testing frequencies vary depending on the water source, the number and type of user, and the type of test. If State or local Health Departments do not perform the water sample analysis, State Certified laboratories must be used.
BMP 4.4: Control of Sanitation Facilities Same National BMP Fac-4	State and local authorities will be consulted prior to the installation of new sanitation facilities, or modifications of existing facilities to assure compliance with all applicable State and local regulations. All phases of sanitation management (planning, design, inspection, operation, and maintenance) will be coordinated with State and local Health Departments and RWQCB representatives.
BMP 4.5: Control of Solid Waste Disposal Same National BMP Fac-5	A public education effort to control refuse disposal will be a continuing process accomplished through the use of signs, printed information, mass media, and personal contact. Solid waste disposal methods, which define and describe collection, removal, and final disposal methods are described in the operating plan. Garbage containers are planned in areas that are convenient for recreationists.
BMP 4.8: Sanitation at Hydrants and Water Faucets Within Developed Recreation Sites Same National BMP Fac-3	The public will be informed of their sanitary responsibilities by posting signs, on recreation site bulletin boards and at hydrants or faucets, and by personal contact.
BMP 4.9: Protection of Water Quality Within Developed Recreation Areas Same LTBMU Practice	In the campground, the public is encouraged through the use of signs, pamphlets, and public contact to conduct their activities in a manner that will not degrade water quality.

Appendix C
Response to Comments
From 30 Day Comment Period (March 2014)
Historic Sites BMP Retrofit Project

In response to the legal notice for the 30 day comment period for the Environmental Assessment (EA), 41 comment letters were received.

All references to the EA in this document refer to the Final EA unless otherwise noted. In the event that commenters reiterate comments made to and responded to earlier in this document, these duplicated comments are noted and reference to previous responses are provided. The comments and the Forest Service (FS) responses are as follows:

Comment Letter 1 – John and Judy Shilling
Comment 1-1: We ask that you accept the No-Action Alternative of the traffic circulation and modify it to create an Alternative 4.
Forest Service Response: *Comments that state a position for or against a specific alternative are appreciated as this gives the Forest Service a sense of the public's feeling and beliefs about a proposed course of action. Such information can only be used by the decision maker(s) in arriving at a decision and not for improving the environmental analysis or documentation. Alternative 4 was created and responds to public input.*

Comment 1-2: We ask that you reject the Proposed Action/Alterative 2 due to the creation of the loop road in the circulation plan. The loop road will have a detrimental effect on the visual and historic values of the site within the project area. The loop road would create difficult intersections, particularly for entrance to the Taylor Creek Visitor Center parking lot.
Forest Service Response*: As a result of these comments, additional visual, noise, and heritage impacts from the loop road were analyzed. Although the analysis still indicated that the loop road would not have an adverse effect on the character and eligibility of the site on the National Register of Historic Places, there is a deeply personal connection to this historic site by visitors and locals alike that is not easily characterized through these metrics. As such, a fourth alternative was created that moves the loop road closer to SR89. Alternative 4 increases the buffer to the historic buildings over Alternative 2, but still provides the connectivity and circulation improvements that could be achieved by the loop road in that alternative. The effects of the loop road, along with other alternative elements are discussed and analyzed in Chapter 3 of the EA and no significant impacts were identified.*

Comment 1-3. We ask that you reject Alternative 3; there are many things wrong with the proposed circulation patterns in Alternative 3. We disagree with adding 2 left turns on Heritage Way, adding parking and creating left turn cross traffic exiting Kiva and Tallac.
Forest Service Response: *See response to Comment 1-1 and 1-2.*

Comment 1-4: Combine the best elements of the No-Action, Alternative 2 and Alternative 3

into a new Alternative 4:
1. Retain current ingress and egress roads as they are.
2. Construct Restroom at Kiva parking (Alt 2 and 3) with a foot washing station. Add a kayak/paddle board washing station as well. We want to change the Tahoe "dog beach" to a paddle sport site. Change your "PMC" (preferred management clientele) by changing what you offer.
3. Increase parking at Kiva (20) and Tallac (120) (Alt 2). 120 new spaces at Tallac is scary. Tallac is the "free" beach. Use will increase with more free parking but it is impossible to know how many new visits we will see versus the walk-ins who cannot park there now. Many bicyclists also use the restroom at Tallac. The current 8-unit restroom, opened in 2004 is too small for this additional use from tripling the parking. I have done parking studies and learned we get 2.6 people per vehicle and one dog per 4 vehicles. Only 20 new parking spaces are proposed at Kiva. With a new restroom, more of the 140 total increase should be shifted to Kiva. First, consider an approximate 50/50 split subject to terrain and design limitations.
4. Increase Valhalla parking by 45 (Alt 2). Move the gate back to vicinity of the well. Provide a turn-around in front of the gate.
5. Construct 15 additional RV volunteer sites at Baldwin. Replace the facilities building. As recreation appropriations shrink, more volunteers are needed.
6. Pave the parking on SR 89 at G on the map (Alt 2). Create a paved path to bike trail from the lot to the mainline trail and Valhalla.
7. Polo Field parking (Alt 3). The polo field is 1, 4 as long and as wide as a regulation field. It is slightly more than 2.6 acres. Do not limit it to 100 vehicles. Construct a perimeter ditch to capture runoff and to depict what the field looked like. Clear cut, brush-hog and surface it with wood chips. Access apron should be behind the Valhalla gate. On peak event days HA and THE could staff, charge for parking and split the take. Management would be by "field parking" practices with attendants directing drivers. Many vehicles would be accommodated.
8. Add a paved bike trail parallel to Heritage Way to the approximate location of the existing Tallac kiosk at the entrance to Baldwin. Objective is to get bikes and pedestrians off of Heritage Way.

Forest Service Response: *Alternative 4 was created and responds to public input. Additionally, in response to each item:*

1. *See response to Comment 1-1*
2. *A foot washing station is proposed in Alt 2 and 3. A kayak washing station is not an identified need for this type of facility. The Forest Service does not manage its sites for a "preferred management clientele". All people (visitors and locals alike) have equal rights of access to public lands managed by the Forest Service. The site currently provides access for paddle sports.*
3. *All alternatives propose an addition of 20 spaces at the Kiva Point parking lot. This decision does not preclude the construction of additional parking spaces in the future. Parking additions were concentrated at the Tallac public parking lot because the location serves multiple uses and is centrally located, which more fully meets the purpose and need.*
4. *Alt 2 and 4 propose 45 additional parking spaces in the Valhalla lot. Maintaining the existing intersections (regardless of gate location and turn-around opportunities) does not reduce congestion along SR 89, or provide for improved circulation and connectivity within the site. See Chapter 3 for additional details.*
5. *See Alt 2 and 4.*

6. *See Alt 2 and 4.*
7. *Alt 3 proposes 100 event parking spaces on the Polo Field. Operational considerations are outside of the scope of this EA. The addition of more than 100 parking spaces on the Polo Field is not precluded as a future activity.*
8. *See Alt 2 and 4.*

Comment 1-5: BIKE AND DUAL-USE TRAILS
1. All new trails should be at least 10 feet wide. Experience has shown that 2 people walking side by side, meeting 2 people, need 10-12 feet to comfortably pass. Recognizing this, the 8 foot width of the existing main-line trail is going to be widened to 10 feet (12 would be better) under the Access Travel Management plan.
2. The traffic consultant had a good suggestion for the three road/bike trail intersections (Valhalla, Heritage Way and Visitor Center road.) Also consider for Baldwin Beach. Move the bike trail, only at these crossing locations, slightly north to give vehicles more room to get off the highway and decelerate. This is well depicted at C1 on Proposed Action/Alternative 2 Concept Drawing. The signage should be changed so that vehicles are directed to stop, not the bikes. This is the practice that has developed at these crossings. Bike riders generally do not stop and drivers do not expect them too.
3. Drop the proposed bike trail stub ending at Smokey Bear Circle. It would miss-lead people to thinking it is the way to Fallen Leaf Campground through the RV trailer park.
4. Work with CalTrans on SR 89. Road agencies everywhere have devised traffic lane designs to handle the types of left turn and merge issues we have in the South Shore Corridor.
a. Create left turn pockets on SR 89 for Fallen Leaf Lake Road and Heritage Way.
b. For VC create an acceleration lane (I do not know the correct term) for cars turning east so they can exit VC driveway and merge with east bound traffic.
c. Do the same for Valhalla. Needed to handle the additional parking.
d. At Heritage Way and SR 89 this turn pocket might be a 2-way center lane going east.
e. There is ample land adjacent to the existing pavement to in essence add a middle lane for stretches along SR 89.

Forest Service Response:
1. *See Alt 2 and 4. Bike trails are proposed to meet AASHTO Class I bike path standards (10 feet wide with 2 foot shoulder).*
2. *See Alt 2 and 4. Requiring vehicles to stop at the bike path crossing is not consistent with common design standards (AASHTO) and would pose a safety risk. Changes to the bike path at Baldwin Beach are outside the scope of this project.*
3. *Stakeholder input indicated a need for pedestrian connectivity between the Baldwin Trailer Park and the main bike trail system to facilitate safe non-motorized access for volunteers between the facilities.*
4. *Work on SR 89 is outside the scope of this project. The LTBMU is continuing to work with Caltrans to improve the highway corridor.*

Comment 1-6: The plan is driven to eliminate one highway intersection. But this need is never satisfactorily proven. There are statements throughout the EA made as facts that are not substantiated with data. Data is sorely lacking.
Forest Service Response: *A reduction in the number of highway intersections accomplishes the*

purpose and need for the project. See Section 3.3 Circulation. No specific deficiency in data is identified by commenter.
Comment 1-7: There is no over-arching vision for the area — the South Shore Corridor Project planning is fragmented. While they are mentioned, there are at least 4 other project plans in the area. These include a new visitor center, the Fallen Leaf ATM, Camp Richardson BMPs and CalTrans work on SR 89 - which is rumored to eliminate all street-side parking and add 4 foot bike lanes on both sides of the highway.
Forest Service Response: *The LTBMU is aware of a number of complex issues within the South Shore Corridor along Highway 89. While the Forest Plan provides overall direction for the LTBMU's management of public lands within the Lake Tahoe Basin, including the facilities within the South Shore Corridor, additional planning and investment is needed to address these complex issues. The scope of the current project is geographically bound as described in Section 1.2 of the EA. This EA, while consistent with law, regulation, and policy, does not preclude future efforts to address other issues in other locations within the larger recreation context of the South Shore Corridor.*

Comment Letter 2 – Perry R. Obray
Comment 2-1: Consider passive solar energy for pathways and structures.
Forest Service Response: *The comment does not take issue with any specifics of the alternatives or environmental analysis.*

Comment Letter 3 – Robert and Charlotte Probst
Comment 3-1: We feel that for the best coverage of all items that Alternative #2 would be our choice.
Forest Service Response: *See response to Comment 1-1.*

Comment Letter 4 – Holden Brink
Comment 4-1: Believes project will improve area. Would like to know if measure will be introduced to reduce dog waste. Will dogs be allowed to use the area as they are now?
Forest Service Response*: Current regulations regarding dogs will remain in place and are unaffected by this project. See Section 1.9.*

Comment Letter 5 – Bob Rowen
Comment 5-1: Minimize the improvements in the Kiva Beach area, doesn't want paved trails or human barriers.
Forest Service Response: *Improvements in the Kiva Beach area are proposed to manage recreation use and limit resource impacts consistent with the project Purpose and Need.*

Comment 5-2: Consolidate parking into fewer parking areas located further from the lakeshore. The elimination of the existing Kiva parking area should be considered in connection with the increase in parking capacity at the Tallac Historic Site.
Forest Service Response: *Consolidating all parking into a centralized lot further from lakeshore destinations would limit access for persons with disabilities, as well as reduce the quality of recreation opportunities. The environmental effects of the parking areas are analyzed in Chapter 3.*

Comment 5-3: Restore natural habitat by elimination of volunteer camping areas. Consider

using camping facilities at Camp Richardson for volunteers.
Forest Service Response: *Elimination of volunteer camping areas would reduce the effectiveness of the volunteer program and the site maintenance and operation that it provides. Environmental effects from volunteer camping areas are described in Chapter 3.*

Comment 5-4: Would like Forest Service to address winter parking in this area.
Forest Service Response: *The concern regarding provision of plowed winter parking is discussed in Section 1.9 of the EA.*

Comment Letter 6 – Morgan Hwy88
Comment 6-1: Moving the RV area for volunteers to site across highway is a good idea.
Forest Service Response: *See response to Comment 1-1.*

Comment 6-2: Closing the loop to connect the Visitor Center/Stream Profile Chamber area to the Tallac hall and theater area is unnecessary and ill advised.
Forest Service Response: *See response to Comment 1-1. Comment does not identify a specific environmental effect from any project element.*

Comment Letter 7 – John Bryden
Comment 7-1: I would like you to reject Alternative 2 and 3 and create an Alternative 4.
Forest Service Response: *See response to Comment 1-1.*

Comment 7-2: The project will increase traffic with the additional parking and reducing the number of exits from 3 to 2 will increase wait times resulting in wasting gas, more exhaust pollution and road rage.
Forest Service Response: *Effects related to transportation and circulation are discussed and analyzed in Section 3.3 of the EA.*

Comment 7-3: The loop road will divide the historic estates and obliterate what is left of Yank Clements road.
Forest Service Response: *Effects related to Heritage Resources are discussed and analyzed in Section 3.2 of the EA. Alt 4 was developed in response to public comment.*

Comment 7-4: The loop road will increase the vulnerability of the historic site to fire.
Forest Service Response: *Based on conversation with agency fire management staff, the risk of site vulnerability to fire is not increased as a result of the loop road.*

Comment 7-5: The project area should have included the visitor center parking lot and the visitor center. A short road between the visitor parking lot and the start of Kiva Point road needs to be considered. Which would allow visitors to go between Tallac, Kiva Point and the visitor center without going on Hwy 89.
Forest Service Response: *The Taylor Creek Visitor Center and Visitor Center parking lot are outside the scope of the project. See section 2.6, which discusses alternatives considered but not analyzed in further detail.*

Comment 7-6: The EA should have addressed the human and dog waste on the beaches and sites during the period between November and May.

Forest Service Response: See Section 1.9.

Comment 7-7: The bigger new parking lot needs to be at Kiva Point instead of Tallac and needs to be plowed with paid permit parking like the Snow Park. The new bathroom should have 8 units and not 6 and it should be winterized for use year round. Service should be maintained year round.
Forest Service Response: See response to Comment 1-4. The description of the restroom in Alt 4 includes a 6-8 unit restroom in response to comments. See Section 1.9 for information regarding winter use of the facility. The decision to charge for parking is outside of the scope of this project.

Comment Letter 8 – John Long
Comment 8-1: Alternative 1, No Action, should be taken off of the table.
Forest Service Response: *See response to Comment 1-1.*

Comment 8-2: The Tallac Point restroom and 20 additional parking spaces should be the number one priority along with pathway upgrade.
Forest Service Response: *Thank you for your comment. See response to comment 1-1. Comments relating to prioritization of project implementation are outside of the scope of the EA.*

Comment 8-3: The Alternative 3 road configuration is better. If Alternative 2 loop road is built would like it built closer to Hwy 89 to be further from the historic buildings
Forest Service Response: *See response to Comment 1-1. Alt 4 was developed in response to comments.*

Comment 8-4: The added parking spots and extended parking spot at Tallac, and added parking at Valhalla are important additions.
Forest Service Response: *See response to Comment 1-1.*

Comment 8-5: Adding 15 new RV sites at Tallac is unnecessary. 4-6 sites would be better.
Forest Service Response: *The number of proposed volunteer campsites was developed through coordination with THF and FS employees and is based on the number of sites necessary for a viable volunteer program. Alt 2 and 4 propose improvements to the volunteer camping outside of the Tallac Historic Site at Baldwin Trailer Park.*

Comment 8-6: Would like to see sewer hookup installed for the 6 existing RV sites at Tallac.
Forest Service Response: *Alt 3 proposes full utility hookups at the volunteer RV lot, including sewer.*

Comment 8-7: I am against the reconfiguring the Tallac site campground to 15 improved spots due to visual impacts and the need for additional showers.
Forest Service Response: *See response to comment 8-5.*

Comment 8-8: I do not feel the Polo Field parking is needed with the addition of other parking spaces being added in the various site locations.
Forest Service Response: *See response to Comment 1-1. Alt 2 and 4 do not propose parking on the Polo Field.*

Comment Letter 9 – John Roos
Comment 9-1: I am concerned that the proposed loop road would severely cut into this somewhat pristine area between the highway and the historic buildings. I feel there needs to be a buffer between the modern traffic and the world of long ago, provided by the open space currently existing. Pushing the traffic further into the historic area would only ruin one's experience of yesteryear that is so unique to that area.
Forest Service Response: *Effects related to Heritage Resources are discussed and analyzed in Section 3.2 of the EA, and Recreation effects are discussed and Analyzed in Section 3.1 of the EA, and no significant effects were identified. Alt 4 was developed in response to public comment.*

Comment 9-2: I agree that there needs to be some adjustments to the traffic flow, but option #2 is too extreme in my opinion. Perhaps parking lot between Valhalla and the Pope Estate, closer to the highway would make sense, or even a road parallel to the highway to a parking area would work. I just think we could come up with a better option.
Forest Service Response: *See response to Comment 1-1 and 9-1.*

Comment 9-3: I have not been pleased with the somewhat permanent closure of the Valhalla driveway with only a dirt lot on the highway. A paved parking area just inside the gate where there is a big open disturbed area would make sense, as I know how quickly the parking can fill up near the estate.
Forest Service Response: *See response to comment 1-4. See section 1.9 of the EA.*

Comment Letter 10 – John LoBuono
Comment 9-3: The proposed plan is waste of time and resources. Building a road through the middle of forest is a bad idea. Yes, more parking is desirable, but this plan is not worthy - wildlife will perish crossing one more needless road.
Forest Service Response: See response to Comment 1-1. Effects to wildlife are discussed and analyzed in Section 3.5 of the EA and no significant effects were identified. Alt 4 was developed in response to public comment.

Comment Letter 11 – Linda M. Cole
Comment 11-1: There is no mention of winter activity at Valhalla, i.e. Winter Trek, weddings, or Boathouse Theater productions. These activities, if they still occur, could have an impact on the west end of the properties. The same is true of fall/autumn activities at the Baldwin Estate.
Forest Service Response: *This project does not propose any new activities. Operational decisions regarding activities and opportunities are outside of the scope of this project, see section 1.9 of the EA.*

Comment 11-2: Many of the proposals will require maintenance. How will the LTBMU allocate funding for additional personnel?
Forest Service Response: *LTBMU allocation of funding for personnel and for facility maintenance is outside of the scope of this project.*

Comment 11-3: When proposing fencing along the 2000 linear feet of shore line, what mitigation is in place to protect the historic remains of the hotel, casino, boathouse and pier in the "resort complex" area and the grinding stones at Kiva Point?

Forest Service Response: *The fencing proposed in all alternatives is a replacement of existing fencing. Project design features are included in Chapter 2 of the EA and include measures to protect heritage resources.*

Comment 11-4: I am not a big fan of expecting the public to obey signing. I wish I had a good solution to offer for the Taylor Creek Marsh, but unfortunately I don't. Fencing it off is worse because the public will just go over, under or around the fencing creating even more environmental damage. The only real solution is more personnel to monitor the area. Perhaps watershed would be willing to pay for a temporary employee during the height of the 'use period'. Recreation (Interpretation) has never had the funding and ultimately it is a Watershed issue.
Forest Service Response: *See response to Comments 1-1 and 11-2. Environmental effects of the proposed fence are discussed in Chapter 3 of the EA and no significant impacts were identified.*

Comment 11-5: The vehicular circulation pattern: There are so many activities at the Tallac site that need to be addressed individually: Valhalla programs and parking, Fire personnel and parking, volunteer RV park and parking, and public access to the historic site. Historically there have been a number of problems in these areas that need solutions.

a. As proposed, the Tahoe Tallac Association (TTA) needs to have a larger parking lot that can be gated and monitored to keep persons and vehicles off unpaved areas.

b. RV Volunteers need their own parking area separate from Fire personnel to insure their safety and privacy. They have a difficult time with temporary fire personnel "invading" the "park". Solution: As proposed, make the RV spaces wide enough for their rigs and vehicles. On the proposed plan, Figure 4, gate the entry drive with a 'card' system so only the volunteers can enter. See item 'c'.

c. Fire personnel needs their own parking area where they can feel comfortable sleeping in their vehicle overnight (as some of them do) and available to them without having to compete with overflow parking from TTA events. Solution: Slightly enlarge (10 additional spaces) the 'admin' lot to accommodate Fire and Tallac administrative personnel. And, on the proposed plan, Figure 4, gate the east drive to the admin lot off the Valhalla entry.

d. As proposed, enlarge the public parking lot and mark spaces or over-sized vehicles. Create a paved path from the parking lots to picnic area. This is difficult due to the amount of historic remains in that particular area including the Tallac Hotel and the Promenade AND (most importantly for this report) the old growth trees (the largest grove left in the Tahoe Basin). If you don't create one, the public will. When they are carrying picnic food and drinks, the visitors will not take the 'long way around'. Find the shortest path between point A and point B, define it and sign it. Most of all address it in this report and define the mitigation proposed.
Forest Service Response:

a. *See response to comment 1-1. See Alt 2 and 4.*
b. *Operational considerations are outside of the scope of this project; see Section 1.9 of the EA. Alt 2 and 4 provide volunteer camping opportunities outside of the Tallac Historic Site*

at the Baldwin Trailer Park and would alleviate many of the operational issues identified in the comment.

c. *See response above.*

d. *All alternatives allow for improvements to pedestrian pathways, including hardening of surfaces for accessibility. Project design features protect Historic features (see Chapter 2 of the EA). No old growth trees are proposed to be removed for creation of pedestrian pathways in this location.*

Comment 11-6: Create a walking/biking path between the new parking lot and the Visitor Center (VC). The old one is there but is not clearly defined or signed so the public just wanders any which way to get from the VC to the Historic Site and vice versa causing further damage to the environment.
Forest Service Response: *Under all alternatives, pedestrian pathways may be upgraded, including signing and delineation.*

Comment 11-7: There is no mention whatsoever of the Promenade. Surely it will be as protected as the environmental concerns. It is probably not noted for this report, but I would like to see it mentioned and the assurance that it will be restored and preserved.
Forest Service Response: *Protection of historic features within the project area is part of the project Purpose and Need. Restoration of the Promenade is not proposed and this time, but is not precluded from occurring in the future.*

Comment Letter 12- Frances Alling
Comment 12-1: I think this is a real danger to all the plants and trees in this area, and I would like to recommend no roadway through the estates!
Forest Service Response: *See response to Comment 1-1. Effects plants and trees are discussed and analyzed in Section 3.4 of the EA.*

Comment Letter 13- Carol Bridges
Comment 13-1: The area is home to plantings and trees that date back in our history and as such, should be preserved as the way of life was back then. This area is a learning center for our children and visitor's to our area. I don't see how we can bring it into the 21st century without destroying a lot of what makes it special.
Forest Service Response: *Effects to heritage resources are discussed and analyzed in Section 3.2 of the EA.*

Comment Letter 14- Ann Rasmussen
Comment 14-1: Exhaust fumes from cars on a new Loop Road, as well as digging ditches close to estate buildings will disrupt many old plants and trees in this historical area.
Forest Service Response: *Effects from the project elements are described in Chapter 3 of the EA. The gardens and other horticultural species will not be displaced as a result of the project. Project Design Feature HR-4 was added to clarify this aspect of the project.*

Comment Letter 15- Jeanne Benin
Comment 15-1: I am concerned that there may be plans to renovate the Tallac Site, including a

loop road and moving gardens to put in BMPs.
Forest Service Response: *Chapter 2 of the EA describes the alternatives being considered and Chapter 3 discusses and analyzes the effects of the alternatives. See response to comment 14-1.*

Comment Letter 16- Sherie Brubaker and Randy Matthews
Comment 16-1: We are in favor of Alternative 2.
Forest Service Response: *See response to Comment 1-1.*

Comment Letter 17- Patti Acri
Comment 17-1: Do not change our beautiful historic areas in the basin. I am extremely opposed to the loop road. It would uproot habitat and create a fire hazard.
Forest Service Response: *Please see response to Comment 1-1. Environmental effects from circulation alternatives are analyzed in Chapter 3 and no significant effects were identified. See response to Comment 7-4.*

Comment Letter 18- Larry Van Sant
Comment 18-1: I believe the proposed road would greatly diminish the aesthetic and environmental conditions of this historically significant and tranquil area.
Forest Service Response: *Scenic effects of the alternatives are discussed and analyzed in Section 3.1 of the EA. Effects to other resources are also discussed and analyzed in Chapter 3 of the EA and no significant effects were identified.*

Comment Letter 19- Joe Tillson, President Tahoe Heritage Foundation
Comment 19-1: The THF is in favor of additional parking; polo field that can serve for event parking; the improvements to the Kiva beach area; addition restrooms; improved beach access with shore stabilization; volunteer camping within the site as stated in "F" of Alternative 3; bike trails as outlined in Alternative 2.
Forest Service Response: *See response to Comment 1-1.*

Comment 19-2: We consider negative points of the alternatives and matters that could be improved:
• Entrances from Highway 89 should remain as they are now
• Additional restrooms
• Availability of the restrooms in the winter months especially in the areas used by the public
• The road should remain as is or in Alternative #3
• We believe the loop road is not needed.
Forest Service Response: *See response to Comment 1-1. See response to Comment 1-4. Concerns related to management of winter operations are described in Section 1.9 of the EA.*

Comment 19-3: Our recommendations for improving the plans are as follows:
• instead of spending resources on the loop road, use the funds to improve the existing infrastructure.
• consider a Welcome Center, winter parking area at "C 2" entrance. This would offer the visitor the opportunity to ask questions, get directions and use bathroom facilities at the center.
• year around use of the bathrooms.

Forest Service Response: *Comments relating to prioritization of project implementation are outside of the scope of the EA. Consideration of a Welcome Center is outside of the scope of this project. Concerns related to management of winter operations are described in Section 1.9 of the EA. The Forest Service will continue to work with THF as project planning and implementation occurs.*

Comment Letter 20- David and Lynne Briscoe
Comment 20-1: We urge you to reject the new loop road and instead add ingress and turn lanes to the existing road. A new road would have negative impacts on this beautiful site.
Forest Service Response: *See response to Comment 1-1 and 1-4. Effects of project alternatives are discussed and analyzed in Chapter 3 of the EA and no significant effects were identified.*

Comment Letter 21- Kathryn Bricker
Comment 21-1: I oppose the addition of a loop road, favoring instead addition of turn and merge lanes to the existing roadway. Doing so would protect scenic quality and reduce the risk to wildlife who cross roadways.
Forest Service Response: *See response to Comment 20-1.*

Comment Letter 22- Kelly Ross, Camp Richardson Corral
Comment 22-1: A few concerns we have with this project are:
- To maintain continual open communication throughout this project, so we may continue our summer wagon ride operations in a safe manner
- To maintain open access into our only driveway to the Corral for our customers and employees during the construction phase of the c1 road into the Tallac site
- The proposed multi use path "H" on the map of alternative 2 , does not state specifically Wagon/ equestrian use. We want to clarify that this is the path we currently use on our permitted wagon loop and that there would not be a use conflict with us running our wagon rides in the evenings through the Tallac site
- During the design and construction of the new vehicular reconfiguration circulation, please consider appropriate curb brakes to allow our wagon and horses to travel safely without any curb interruption.

Forest Service Response: *Design features were added after scoping to address these concerns, see Chapter 2. The Forest Service will continue to work with the Camp Richardson Corral as project planning and implementation occurs.*

Comment Letter 23- Jane Mitchell
Comment 23-1: When we are talking about an unusual, irreplaceable, historic site, then maintaining the historic nature of the site should be a higher criterion than ease of use. Who is it to say that convenience is more important than preservation? Once the site is altered, it will never have the same historic quality.
Forest Service Response: *Protection of the site's historic values is part of the project's Purpose and Need. Effects to heritage resources are discussed and analyzed in Section 3.2 of the EA and no significant effects were identified. The Forest Service is required by law to comply with accessibility requirements (ABAAS, FSORAG). The project seeks to strike a balance between improved access, resource protection, and maintaining the historic character of the site.*

Comment 23-2: Were the concerns of the persons who work directly with the historic elements of the site (those who volunteer, those who garden, those who regularly interact with the visitors) brought to the attention of the SHPO officer such that he/she would know that there are two sides to this story? How was the determination that "the project is consistent with the Programmatic Agreement..." reached? Who made that determination, SHPO or USFS? Did SHPO actually determine that the loop road would not have a detrimental impact on the Historic Site, especially the gardens that are visited even when the buildings are closed?
Forest Service Response: *Following coordination with a SHPO representative and a representative from the Forest Service Pacific Southwest Regional Office (Region 5) onsite, project analysis has been updated and clarified. Formal consultation regarding effects of project activities to heritage resources consistent with Section 106 of the National Historic Preservation Act will occur outside of the programmatic agreement. This consultation will be complete prior to a final decision. Section 3.2 of the EA has been updated to reflect this.*

Comment 23-3: Heritage Resources - HR-1 through HR-3 reference the Washoe heritage site. Are the Estates not considered heritage sites? Why are they not considered at this point?
Forest Service Response: *Protection of the site's historic values, including the Estates, is part of the project's Purpose and Need. The project is consistent with Section 106 of the National Historic Preservation Act of 1966 (see Heritage Design Features in Chapter 2).*

Comment 23-4: EA Page 23 — "The visual and noise impact of the loop road was further analyzed The Baldwin Trailer Park site was added to the analysis-area ....as an alternative to the RV volunteer lot…"

As this is in the noise section of the report, the implication is that the RV volunteer lot is being moved because of noise. Why move the volunteers away because the noise of the loop road might bother them and then conclude that the noise is minimal, not significant? It is believed by many that the presence of volunteers on the site around the clock is a deterrent to mischief when the site is closed at night. Maybe a better solution is to leave the volunteers where they are and remove the loop road and the noise from the plan instead of moving the volunteers?
Forest Service Response*: Improvement to the Baldwin Trailer Park was included as an alternative not as a consequence of the loop road, but rather from public comment during scoping. The range of alternatives is described in Chapter 2. None of the action alternatives preclude the use of the existing Volunteer RV lot for security purposes.*

Comment 23-5: It does not seem logical that it will be easier to get more cars out of fewer exits.
Forest Service Response: *Effects related to transportation and circulation are discussed and analyzed in Section 3.3 of the EA. The project seeks to improve overall circulation, not just waiting times of vehicles exiting the site. Reducing the entrances from 3 to 2 in Alt 2 and 4 may increase the relative wait times of the vehicles exiting the site, however these alternatives provided other benefits, including the reduction in congestion along the highway corridor, the flexibility of the loop road for management of the site, the ability of vehicles to utilize an alternate exit if one is congested, improvement in circulation and connectivity within the site, as well as improving the Level of Service (LOS) at Fallen Leaf Road.*

Comment 23-6: Page 28 — Alternatives considered, but not in further detail — "Under this alternative ...the loop road was proposed to be smaller in size and didn't extend as far into the site as the loop road in Alternative 2." Response — "The alignment of the smaller loop road did not utilize existing disturbance."

The verbal explanation of the Alternative 2 loop road said that it used the gravel road behind the barn in order to use existing disturbance, but the map in the proposal shows it much further away in what appears to be undisturbed area. I may have misunderstood. What was at that location before? But more importantly, it is not clear how the queue lengths could be so much longer if the loop were shorter with the same number of cars? Wait time is generally based on the number of cars waiting and the conditions of the road that they are entering, not on the length of the road that they are leaving. Please explain in more detail.
Forest Service Response*: The comment references only a portion of the rationale for dismissing the alternative. See section 2.6 for the full explanation. The alignment of the loop road in Alternative 2 follows portions of the historic road alignment as shown on the project maps. Effects related to transportation and circulation are discussed and analyzed in Section 3.3 of the EA. See response to Comment 23-5. Additionally, Alt 4 was developed in response to public comment and realizes the benefits of the loop road while providing a greater buffer to the estates.*

Comment 23-7: Page 35 — "...the entirety of the site is open to the public for pedestrian use and pathways connect each of the site elements. Currently it is not immediately apparent to the public that this this is possible ....."

This could be addressed with better signage, which would be much cheaper than new roads and would not forever change the historic nature of the site.
Forest Service Response: *All alternatives propose improved signage. Please see response to Comment 1-4. Effects from circulation changes are described in Chapter 3 of the EA and no significant effects were identified.*

Comment 23-8: Page 37 — "Implementing this alternative [3] would have the direct effect of enhancing the quality of recreation opportunities within the project area.

"Enhanced" is in the eyes of the beholder. Many come to an historic site to experience life as it was in historic time. Those would believe that the encroachment of automobiles would detract from rather than enhance the experience. Those who wander the grounds in the summer or cross country ski and snowshoe there in the winter are looking to escape the development of South Lake Tahoe and enter into the quiet of historic times.
Forest Service Response: Please see response to Comment 23-1.

Comment 23-9: Page 40 — "Implementing this alternative would have the direct effect of enhancing the quality of recreation opportunities within the project area."

The only way that this statement can be true is if "recreational opportunity" is meant to focus beaching, biking etc. If it is meant to be the opportunity to enjoy the historic nature of this site, then it will not be enhanced. As I think about this, I reflect on the fact that the BLM study monies were specifically for historic sites. To that end it seems that the opportunity that should be enhanced should be the opportunity to experience the historic nature of the site.

Forest Service Response: *The Forest Service manages its recreation sites for all visitors. While many people enjoy visiting the historic buildings, others enjoy the natural setting and access to Lake Tahoe. The project seeks to strike a balance between improved access, resource protection, and maintaining the historic character of the site. Project funding comes from the Southern Nevada Public Lands Management Act and is specifically identified for water quality improvements.*

Comment 23-10: Page 42 — Analytical Conclusions — "The overall recreation opportunity and experience is improved to the greatest extent under Alternative 2 It also allows for the greatest flexibility for site management in the future."

I take great exception to the idea that Alternative 2 allows for the greatest flexibility .. .in the future. Once these news roads are built, they will be the framework for any changes that need to be made or are desired in the future. One is not going to put in new roads and then tear them out to develop the best plan for dealing with changed needs at the visitor center and the winter use of the area. The greatest flexibility for the future would be to leave the roads as they are in Alternative 1 and delay any road changes until a long-range plan is established with roads, parking, buildings where they work together best.

Forest Service Response: *Alternate 1 proposes leaving the site in its existing configuration. Chapter 3 identifies the effects from all alternatives.*

Comment 23-11: Page 44 — Heritage Resources "An impact is considered significant when prehistoric or historic archaeological sites, structures, or objects listed in or eligible for listing in the National Register of Historic Places (NRHP) are subjected to the following effects: Introduction of visual, atmospheric, or audible elements that diminish the integrity of the property's significant historic features."

I don't see how they can conclude that the loop will not introduce visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features. First of all, "audible"... at times from the gardens the traffic on SH 89 is already heard, quiet but discernable; how can they determine that the noise from moving the traffic closer to the gardens will not be greater and therefore diminish the integrity..." Second, and more important, "atmospheric" ... anyone who has driven down Hwy 50 can see that the exhaust from automobiles has a detrimental effect on the health of the trees—those trees closest to the road are failing. Tallac Historic Site has one of the primer stands of oldgrowth timber in the Tahoe Basin, protected by Lucky Baldwin when he purchased the land that is now the Tallac Historic Site. Do we really want to have more traffic and therefore more exhaust in closer proximity to the old-growth trees? And lastly, "visual" ...it might be possible to locate the loop road and protective planting so that it could not be seen today, but as vegetative growth changes, we cannot protect the historic site visitor from the visual impact of the ever encroaching cars. The loop road is significant according to NRHP terms; it has audible, atmospheric and visual impacts. It should not be built.

Forest Service Response: *See response to Comments 1-2, 23-1, and 23-2. Chapter 3 discusses the effects from all alternatives in the EA and no significant effects were identified.*

Comment 23-12: Page 52 — Queue Lengths — with current roads and intersections for each intersection "no queuing issues are identified....however pedestrian/biker/vehicular conflicts frequently arise when vehicles exit the highway onto the access roads..."

First, the queue lengths indicate that there is no need to change the current road configuration to address queue problems. However I personally experience regularly and pedestrian/biker/vehicular conflict that can be easily solved without new roads or moved intersections. The gate to Valhalla is too close to the bike bath. It should be moved in far enough that a driver who mistakenly approaches that gate has room to turn around and exit without backing back toward the bike path. This can be accomplished without a major study and without new roads.
Forest Service Response: *Please see Section 3.4 Circulation in the EA. See response to Comment 1-4.*

Comment 23-13 Page 56 — Circulation Impacts — "Currently the Valhalla intersection, the Heritage Way intersection, and the Taylor Creek Visitor Center intersection have worst-scenario waiting times and LOS level of (respectively-24 seconds, LOS C; 73.3 seconds, LOS F and 29.9 seconds LOS D. Under Alternative 2 the new Corral intersection and of and Visitor Center intersection would have waiting times and LOS level of (respectively) 92.8 seconds, LOS F; and 30.0 seconds, LOS D.

First, the worst case wait under the current road plan is 73.3 seconds LOS F and the worst case wait under proposed Alternative 2 is 92.8 seconds, also LOS F—19.5 seconds longer than existing. How can that be called an improvement? Just because it is at a different place? And it appears that neither of these analyses takes into account that the number of cars exiting will be significantly greater as the new parking lots are added.
Forest Service Response: *See response to Comment 23-5. All analysis of effects to traffic included the impact from additional parking spaces.*

Comment 23-14 Page 57 — Noise Impacts — "The new loop road would be located (on average) less than halfway between SR 89 and the Estates." And from Table 3-6 doubling of the distance results in a 4.5 dBA reduction in noise. (explained on Page 54) And add 2dBA for the impact from two roads. "The expected total noise impact in the Estates from the loop road and SR 89 combined is estimated to be 46 dBA"

So you start with 41 dBA now, add 4.5 dBA for halving the distance and add 2 dBA for compounded effect of two roads and you get 48.5 dBA. While 41 dBA and 46 (or 48.5) dBA both fall in the quiet range for most individuals; persons seeking the quiet of the historic gardens will experience more noise at a level of 46 dBA than at a level of 41 dBA.
Forest Service Response: *Noise impacts are analyzed in Section 3.4 of the EA and the identified noise increase is not a significant effect, as defined in that section. Additionally, Alt 4 was developed in response to public comment and increases the buffer to the historic estates.*

Comment 23-14 Page 60 — Circulation Alternative 3 — "results in an increase in worst-scenario waiting time at Heritage Way/Fallen Leaf Rd to 279 seconds"

It is clear that this is an unacceptable alternative as the wait times are more than 4 time as long as for Alternative 1 no change and/or for Alternative 2 loop road. While having talked to the team I know it is not true, but Alternative 3 almost feels like it is presented in order to be able to say that Alternative 3 responds to scoping comments, but to be so bad as to throw support to

Alternative 2. It does not feel like a viable alternative to removing the loop road...something that many believed important during the scoping last summer. At the THF presentation of the 3 current alternatives, we had not seen the traffic study but were told that the traffic study supported changing the intersections. We asked that, if the intersections had to be changed, why not just add a frontage road next to SR 89 rather than a loop road that intruded into the site. That is still a very good question and should be addressed during a long-range plan for the total site...not as part of this BMP.
Forest Service Response: *See response to comment 23-5. Alt 4 was developed in response to public comment and increases the buffer to the historic buildings over Alternative 2, but still provides the connectivity and circulation improvements that could be achieved by the loop road in that alternative.*

Comment Letter 24- Lynne Bajuk
Comment 24-1: I object to the Loop Road. The serenity and beauty of the site will not be enhanced by bringing in more exhaust spewing cars.
Forest Service Response: *See response to Comment 1-1. Effects to air quality are described in Section 3.4 of the EA.*

Comment 24-2: The mention of BMPs is upsetting. Placing drainage at the foundations of the historic buildings would be criminal!
Forest Service Response: *See response to comment 14-1.*

Comment 24-3: Additional parking is necessary. Improvements at Kiva Beach look good, but name should be changed.
Forest Service Response: *See response to Comment 1-1. Changing of site names is outside of the scope of this project.*

Comment Letter 25- Alan Miller and Pamela Shaw-Miller
Comment 25-1: We believe the EA contains significant deficiencies, erroneous assumptions and conclusions, and does not disclose all significant potentially significant effects of the proposed Alternatives 2 and 3. We believe an Environmental Impact Statement may be warranted.
Forest Service Response: *No specific deficiencies are identified in this specific comment. The EA is consistent with law, regulation and policy.*

Comment 25-2: The erosion and drainage problems that the proposed project purports to address are, in general, minor and insignificant to lake water quality.
Forest Service Response: *See section 1.3 Existing Condition in the EA for a description of existing impacts to water quality. The Forest Service attempts to address all impacts to water quality wherever possible, regardless of scale.*

Comment 25-3: The proposal to add more paved roads for heavy traffic use while tearing out existing roads that generally serve the area very well seems to be a waste of taxpayer dollars to achieve questionable outcomes.
Forest Service Response: *Comment does not identify a specific environmental effect of any alternatives.*

Comment 25-3: There is nothing in the EA to preclude use of pesticides.
Forest Service Response: *The use of pesticides is not proposed under this project. Herbicide use for the control of noxious weeds is already an approved method, analyzed under a previous NEPA decision. See design feature BOT-3 in Chapter 2 of the EA for a full citation.*

Comment 25-4: The new paving would increase peak storm flow rates and increase the erosive power of flows during storm events exceeding the design storm (cited as one inch per hour and two inches per 24 hours) and thereby may deliver additional sediment and pollutants to Lake Tahoe in such events.
Forest Service Response: *Project storm water Best Management Practices would be designed consistent with relevant standards.*

Comment 25-5: The EA does not discuss or disclose the potential impacts to visitor access, or noise, pollution, or traffic related to project construction.
Forest Service Response*: Section 3.1 describes temporary impacts during construction. Additionally, design features were included to minimize impacts from construction.*

Comment 25-6: Visitor conflicts, such as between bikes and cars, may increase with the proposal, as serious adult bicyclists will tend to use the auto routes rather than the bike path to avoid interference by walkers, baby strollers, and slower little children on bikes.
Forest Service Response: *The circulation pattern for vehicles and non-motorized users are expected to reduce use conflicts in Alt 2 and 4.*

Comment 25-7: The proposal falls far short of meeting the desired condition.
Forest Service Response: *The project is intended to incrementally meet the desired condition.*

Comment 25-8: We think the proposal would detract from the atmosphere of tranquility, the resonance with the history of the site, and would emphasize motorized access rather than maintaining a feeling of timelessness.
Forest Service Response: *Alt 4 was developed in response to public comment. Alternative 4 increases the buffer to the historic buildings over Alternative 2, but still provides the connectivity and circulation improvements that could be achieved by the loop road in that alternative. The effects of the loop road, along with other alternative elements are discussed and analyzed in Chapter 3 of the EA and no significant impacts were identified.*

Comment 25-9: We seriously question the need for new "office and conference space" for the LTBMU at the THS.
Forest Service Response: *The project does not propose new office and conference space. The commenter is referencing a citation from the 1980 Tallac Historic Site EIS. This citation was removed to reduce confusion.*

Comment 25-10: Proposed increases in managed parking are not needed because there is currently not a shortage during early morning, late afternoon, and evening periods during summer months.
Forest Service Response: *The purpose and need for the project describes the need to provide managed parking and vehicle circulation facilities to support peak use periods. The commenter is*

correct in stating that the parking areas are not full during non-peak use periods.

Comment 25-11: The EA does not discuss or recognize the anticipated traffic flow improvements related to future project work within the Camp Richardson Resort area.
Forest Service Response: *Cumulative impacts from projects within the Camp Richardson area are described in Chapter 3 of the EA.*

Comment 25-12: The LTBMU should prioritize funding a pedestrian overcrossing, and additional water quality BMPs at Camp Richardson rather than investing in proposed improvements at the Tallac Historic Site.
Forest Service Response: *Prioritization of funding for projects at Camp Richardson Resort is outside of the scope of this project.*

Comment 25-13: We support paving the existing unimproved lot adjacent to highway 89 near the entrance to parking lot F at Valhalla. Permeable paving should be considered for all the new parking areas together with other BMPs.
Forest Service Response: *See response to Comment 1-1. Use of permeable paving will be considered during project design phases.*

Comment 25-14: We suggest that maintaining an open gate a the Valhalla parking lot F should be made a condition in an amended Special Use Permit fort the Tallac Association. Management of this gate is not fully discussed in the EA and presents a serious deficiency of the EA.
Forest Service Response: *Operation and management of the gate at Valhalla parking lot is outside of the scope of this EA. See Section 1.9 in the EA.*

Comment 25-15: An alternative should be considered (and is provided) to connect the various existing roadways by short connecting roadway segments and adequate signage.
Forest Service Response: *See section 2.6 in the EA.*

Comment 25-16: The proposed barrier between Kiva Point and Taylor Creek Marsh would prevent rather than discourage human or canine entry to the meadow, which only occurs on an occasional basis and is an insignificant cause of disturbance. The main disturbances we've seen to the meadow have been due to beavers, flooding, fluctuating lake levels, and fire. A fence would block access for coyotes and other small animals and birds. It represents a human intrusion in a largely natural landscape.
Forest Service Response: *The effects to wildlife are discussed in Section 3.5 of the EA. As stated in Chapter 2, the proposed fence will not be a solid barrier and would not block passage of wildlife. See section 3.1 in the EA for analysis to scenic resources.*

Comment Letter 26 – Dan Currier
Comment 26-1: There is no evidence of erosion or water quality issues at the site.
Forest Service Response: *See response to comment 25-2.*

Comment 26-2: Parking on off-pavement surfaces occurs rarely. There should be better enforcement of off-pavement parking instead of installing new asphalt to accommodate the cars.

Forest Service Response: *See Section 1.3 for a description of existing condition. Parking currently occurs along almost the entire length of SR 89 within the project boundary. Enforcement of parking regulations is outside the scope of this project.*

Comment 26-3: There should be less development within the THS (Tallac Historic Site), not more.
Forest Service Response: *See response to Comment 1-1.*

Comment 26-4: There should be a public transportation system that allows visitors to park at a location distant from the site and take a bus in. Therefore improvements to the roadways and new parking/asphalt surfaces would not be needed.
Forest Service Response: *Development of a public transportation system is outside of the scope of this project.*

Comment 26-5: Camping and motorhomes inside the THS for volunteers is inappropriate and should not be subsidized using taxpayer money. The Baldwin Trailer Park should also not be provided for the volunteers. The volunteers should stay in Camp Richardson and walk to the site.
Forest Service Response: *See response to Comment 5-3.*

Comment 26-6: Any pedestrian pathways should be on native surface and should not have an impervious surface. People can travel just fine on dirt pathways.
Forest Service Response: *See response to comment 23-1.*

Comment 26-7: The quiet serene nature of the historic site should be preserved. The Forest Service is trying to do what it did when it acquired the property and develop the site into a campground that makes money.
Forest Service Response: *See response to Comment 1-1. Improvements to the volunteer campground facilities are intended to support a viable volunteer program which provides important benefits for operation and maintenance of the historic site.*

Comment Letter 27 – Lachlan Richards
Comment 27-1: Why is the Jameson Beach Property Owner's Association or any of its members not listed in Section 4.5 of the EA? Why were these interested parties not a part of this process?
Forest Service Response: *Public notice occurred in accordance with law, regulation, and policy. See section 1.8 of the EA for a description of the public involvement process.*

Comment 27-2: The EA represents faulty piecemeal planning. The "Project Area" could potentially solve many of the problematic issues related to parking and traffic at Camp Richardson Resort and Jameson Beach Road, and I feel it is negligent that the USFS is attempting to run two completely separate and unrelated EA's on two adjacent properties that for all intents and purposes function as one. There appears to be no attempt by the USFS to develop viable comprehensive solutions for the area as a whole. This is unacceptable and represents old-school unsustainable planning and poor environmental policy and stewardship. I ask that you draft a new replacement EA that broadens the Project Area to also include the Camp Richardson Project Area.

Forest Service Response: *See response to Comment 37-1. The EA is consistent with law, regulation, and policy.*

Comment Letter 28 – Alice Grulich-Jones
Comment 28-1: It seems making more parking for the short peak season is not only a waste of resources but is contrary to the Forest Service's role in maintaining forests and natural recreation areas.
Forest Service Response: *See response to Comment 25-10.*

Comment 28-2: The proposed fence around Taylor Creek Marsh would be an eyesore and would disturb a necessary wildlife corridor. Why not put those resources into enforcing the existing rule and issue tickets to violators?
Forest Service Response: *See response to Comment 25-16. The environmental effects of project alternatives, including the proposed barrier at Taylor Creek Marsh, are discussed and analyzed in Chapter 3 of the EA. Issues related to enforcement of current regulations are outside of the scope of this EA.*

Comment Letter 29 – Ken McNutt
Comment 29-1: I concur with the letter submitted by Alan Miller and Pam Shaw-Miller.
Forest Service Response: *Comment noted.*

Comment Letter 30 – Robert G. Isenhart
Comment 30-1: Both Alternatives 2 and 3 will result in tremendous additional traffic overload when accessing and exiting the site because all traffic is being funneled to one entrance/exit. The "no adverse effect" on exiting traffic on both Alternative 2 and 3 is absurd.
Forest Service Response: *Effects related to Transportation and Circulation are discussed and analyzed in Section 3.3 of the EA and no significant effects were identified. See response to comment 23-5.*

Comment 30-2: BMP improvements within the volunteer RV site are necessary to prevent storm water runoff from the fire crew parking area and the volunteer RV site from gaining access to the paved road and Baldwin circle drive thus directly to the lake. This runoff has to be stopped on site.
Forest Service Response: *BMPs are proposed in all alternatives.*

Comment 30-3: I do not believe the Baldwin museum courtyard surface is impervious to drainage from storm water.
Forest Service Response: *Comment noted.*

Comment 30-4: I agree with: upgrades to the Baldwin RV park and facilities, the addition of twenty parking spaces and restrooms at the Kiva parking lot, additional parking spaces at the Tallac public parking lot, BMP's at the Tallac Historic site, Kiva point, and the beach trail from the Tallac site along the shoreline to Kiva point.
Forest Service Response: *See response to Comment 1-1.*

Comment Letter 31 – Laurie Scribe, Lahontan Regional Water Quality Control Board
Comment 31-1: Given that improved water quality is a listed as a primary goal of the project, it

is unclear why the EA does not include a specific section dedicated to analysis of water quality or hydrology related impacts. Information on water quality BMPs is included in the following sections: recreation, circulation, heritage resources, and botanical resources.
Forest Service Response: *The EA is consistent with law, regulation, and policy. Information on water quality BMPs is included in the following sections: recreation, circulation, heritage resources, and botanical resources.*

Comment 31-2: Inadequate analysis of water quality impacts from slope stabilization. Water Board staff support the objective of the Project to reduce erosion from the site, however the potential impacts of proposed slope stabilization activities along the shoreline are not adequately analyzed in the EA. Very limited information is provided regarding the scope and extent of stabilization other than designating a 2000-3000 linear foot area along the shoreline of Lake Tahoe that may be subject to "slope stabilization activities where needed along the beach using vegetation or structural means (i.e. boulders, terraces, stairs, etc.)". The following information and analyses should be included in the EA:

a. The EA states that water quality BMPs are necessary, in part, to reduce the amount of sediment and pollutants reaching Lake Tahoe; yet the EA does not attempt to quantify or further describe the severity of the erosion issues occurring or the amount of pollution currently reaching Lake Tahoe. Such an analysis would help support the need for stabilization of the shoreline.

b. The EA states that because the fence is in disrepair, unmanaged access to the beach has caused loss of vegetation and subsequent erosion. If this is the case, the EA should analyze the degree to which the erosion problems at the shoreline will be addressed by simply repairing the fence, designating access points, and revegetating the upland areas adjacent to the shoreline.

c. The EA should describe the proximity of shoreline stabilization activities relative to the Lake Tahoe high water mark, and whether or not activities will occur within the area subject to wave run-up under high lake water conditions.

d. The EA could also describe how equipment will be managed to prevent disturbance when accessing the shoreline areas for fence repair and placement of stabilization measures.
Forest Service Response:

a. *In response to comments, additional information regarding the existing condition and impact to water quality was added to Section 1.3 in the EA.*
b. *Repair of fencing to make it an effective barrier is anticipated to reduce unmanaged circulation within the shorezone.*
c. *Project activities will occur above the ordinary high water mark of Lake Tahoe. BMP measures to provide access to Lake Tahoe may occur within areas subject to wave run-up under high lake water conditions.*
d. *BMPs will be utilized to prevent any sediment discharge to Lake Tahoe during construction and limit disturbance to the slope in accordance with the Forest Service*

publication Water Quality Management for National Forest System Lands in California (USDA Forest Service 2011). See section 2.2.1 design features.

Comment Letter 32 – Judith Hildinger
Comment 32-1: I oppose Alternative 2. Adding a paved loop road in this area of undeveloped forest and spending time and money is unnecessary, wasteful, and potentially harmful to Lake Tahoe.
Forest Service Response: *See response to Comment 1-1. Effects from project activities are analyzed in Chapter 3 of the EA and no significant impacts were identified.*

Comment 32-2: I support the suggested alternative provided by Alan Miller and Pamela Shaw-Miller.
Forest Service Response: *Comment noted.*

Comment Letter 33 – Ginger Nicolay-Davis, Tahoe Tallac Association
Comment 33-1: It is in the best interests of the public and the stakeholders at this site to pursue either Alternative 2 or 3 to improve the visitor experience and to preserve the site.
Forest Service Response: *See response to Comment 1-1.*

Comment 33-2: TTA supports Alternative 2 in its entirety and prefer it to Alternative 3 for its inclusion on the Loop Road. With the Loop Road and increased parking we would be able to more easily manage parking at the Valhalla Parking Lot. We could easily place a sign on a closed gate at the parking entrance that says "Gates open at 6pm for tonight's event, please continue to the Tallac Public Parking or Kiva Point Parking". The Loop Road would keep our visitors on the site and give them different parking, biking, and walking options. Additional accessible parking spaces would also be available with better access to the site's facilities and to Lake Tahoe. With the loop road a visitor would never be turned away by a closed gate until they got further into the site and would not have to go back onto Highway 89 to then access another entrance.
Forest Service Response: *See response to Comment 1-1.*

Comment 33-3: Alternative 3 would not solve the entrance problem for TTA and would essentially worsen the situation with the inclusion of the Polo Field Parking. We support the Polo Field as a parking lot but only if included in Alternative 2 with the Loop Road.
Forest Service Response: *See response to Comment 1-1.*

Comment Letter 34 – Jim and Gloria Hildinger
Comment 34-1: Make the area from the Pope Beach entrance to the Fallen Leaf Road intersection a well marked "High Use Recreation Area" with a 25 MPH speed limit enforced with flashing yellow lights, radar warnings, and maybe even camera enforcement. Then widen the highway in that section to allow parallel parking on both sides with marked pedestrian crossings every 100 feet with center post signs provided during the summer months only. With the weather providing the date-of-change the speed limit could be raised to 35 MPH during the winter and spring months.
Forest Service Response: *Alterations to Hwy 89 are outside of the scope of this EA. The Forest Service continues to work with Caltrans to improve the highway corridor.*

Comment 34-2: Knowing beyond a reasonable doubt that "people pollute and the more people the more pollution" why are we constantly increasing the recreational opportunities? Why not reduce the need for what is already available?
Forest Service Response: *No points of concern related to the alternative or the analysis of their effects is identified. Reducing recreation opportunity and access would not be consistent with the purpose and need for the project.*

Comment Letter 35 – James Weber
Comment 35-1: The expansion and updating of the Baldwin RV site sounds good. That way more volunteers would be able to spend time at the site, at any of the four sessions. I am not in favor of improving the campground near the lower Tallac site because I feel that any more RV down near the water would not be hidden from the public that are visiting the site.
Forest Service Response: *See response to Comment 1-1.*

Comment 35-2: I am happy to read that a bathroom is going to be installed at the Kiva parking lot. I would like to think that the bathroom project would be one of the first priorities.
Forest Service Response: *See response to Comment 1-1. Comments relating to prioritization of project implementation are outside of the scope of the EA.*

Comment 35-3: I was also glad to see that parking improvements have been proposed for RVs. The Tallac and Kiva lots have no provisions for people who are traveling through our area. It does not present a friendly image to travelers with RVs that they are subject to ticketing do "illegal parking". Adding the large spots will help that situation.
Forest Service Response: *See response to Comment 1-1.*

Comment 35-4: Having larger parking lots at the sites will help somewhat during the peak months and especially during the holidays, ie. 4th of July. However, I am not sure what, if any, help they will provide to those folks who choose to park along Highway 89 all year, to avoid paying the parking fees at Pope Beach, etc.
Forest Service Response: *Comment noted. Parking impacts related to Pope Beach or other fee sites are outside of the scope of the project.*

Comment Letter 36 – David Gottfredson
Comment 36-1: I would like to add my support in favor of the Proposed Action (Alternative 2). I would suggest that the parking proposed for the former Polo Field under Alternative 3 be added to the proposed action.
Forest Service Response: *See response to Comment 1-1.*

Comment 36-2: I am concerned that the visual character of the historic setting would be substantially altered as a result of formalizing and expanding the volunteer RV campground at the Tallac Site. Improvements at the Baldwin Trailer Park are a much better solution.
Forest Service Response: *See response to Comment 1-1. Effects of project alternatives are discussed and analyzed in Chapter 3 of the EA and no significant effects were identified.*

Comment 36-3: The bathroom proposed for Tallac Point (Kiva parking area) should be implemented as soon as possible.
Forest Service Response: *Comment noted.*

Comment Letter 37 – Ron Saxon

Comment 37-1: If the area for this project "…is part of a larger recreation complex…", then aren't you required by law, or at least by common sense, to have a plan or vision that encompasses the larger recreation complex? This project, along with the Camp Richardson Resort Campground and Vehicle Circulation BMP Retrofit both ignore a major issue that has been raised at another component: the Camp Richardson Resort. In recent years, the Forest Service and its permittees began parking cars along the side of Jameson Beach Road. The result is a traffic nightmare and a significant safety risk.

Forest Service Response*: The LTBMU is aware of a number of complex issues within the South Shore Corridor along Highway 89, including the management of day use parking at Camp Richardson Resort. While the Forest Plan provides overall direction for the LTBMU's management of public lands within the Lake Tahoe Basin, including the facilities within the South Shore Corridor, additional planning and investment is needed to address these complex issues. The scope of the current project does not include activities at Camp Richardson Resort and is geographically bound as described in Section 1.2 of the EA. This EA, while consistent with law, regulation, and policy, does not preclude future and on-going efforts to address other issues in other locations within the larger recreation context of the South Shore Corridor.*

Comment 37-2: If this project adds 45 parking spaces to the Valhalla Parking lot, this will take parking pressure off of Jameson Beach Road, and 45 spaces should then be eliminated from Jameson Beach Road.

Forest Service Response: *See response to Comment 37-1. No specific concerns regarding the alternatives being considered, or to the analysis of their effects are identified.*

Comment 37-3: Consider adding the Polo Field parking to Alternative 2, and make it available for beachgoers.

Forest Service Response: *The project alternatives each increase the amount of managed parking within the project area that would be available for beachgoers and those utilizing other areas of the site. The proposed Polo Field parking is analyzed under Alternative 3 and would provide parking for special events, when demand for parking often exceeds available managed day use parking opportunities. This project does not preclude future projects which might consider additional day use parking in support of activities that occur in other areas of the South Shore Corridor.*

Comment 37-4: I think the Loop Road in Alternative 2 is smart, but I strongly feel that addressing solutions for the parking nightmare on Jameson Beach Road must be included in this project.

Forest Service Response: *See response to Comment 1-1. Issues related to parking within Camp Richardson Resort are outside of the scope of this EA.*

Comment 37-4: The USFS must notify the public and interested parties. The USFS failure to notify any of the [Jameson Beach] homeowners is yet a further illustration of the USFS efforts to "hide the ball" rather than comply with the mandates of NEPA.

Forest Service Response: *See response to Comment 27-1.*

Comment Letter 38 – Dawn Armstrong

Comment 38-1: I believe the proposed changes will negatively affect the ambience of the area for locals and visitors alike. I also believe they will diminish the preservation mission and role of the US Forest Service as protector of Tahoe history.
Forest Service Response: *See response to Comment 7-3.*

Comment 38-2: The site is officially open to the public a very short period during each year, not warranting the extensive paving and permanent site disturbances described in the alternatives. Congestion can be addressed in conjunction with the described Cal Trans scheduled activity and pedestrian safety issues also can be enacted.
Forest Service Response: The site is open to the public year-round, but the historic buildings are only open during summer months. *The purpose and need for the project describes the need to provide managed parking and vehicle circulation facilities to support peak use periods. See response to comment 34-1.*

Comment 38-3: I suggest adding another pedestrian activated signal light at the volunteer RV site adjacent to Camp Richardson Stables. This can allay your reported fears of crossing as well as set the tone for driver and pedestrian that the entire area is multi-use and slow/relaxed go.
Forest Service Response: *See response to Comment 34-1.*

Comment 38-4: I suggest ask Cal Trans to cooperate by creating a middle lane the length of the congested Highway 89 area from the first campground entrance(s) to Taylor Creek. Cars turning into Camp Richardson Resort, the campgrounds, the RV entrances, the Valhalla complex, the Visitor Center can be taken out of the traffic lanes by using this middle lane for turning into the multiple facilities.
Forest Service Response: *See response to Comment 34-1.*

Comment 38-5: I suggest eliminating the volunteer RV parking on the lake side of the site and save that money for non invasive improvements, including pedestrian crossing safety elements and better signing.
Forest Service Response: *Comment noted. Alt 2 and 4 analyze improvements to the volunteer camping opportunity at the Baldwin Trailer Park.*

Comment 38-6: I do not support the paving of the Polo Field for parking, or the creation of new paved roadways. I do not support additional parking for sun-reflecting vehicles which will steal the view and kill the spirit of the site.
Forest Service Response: *See response to Comment 1-1. Alt 2 and 4 do not propose parking on the Polo Field.*

Comment 38-7: Create on and off site signing which addresses the listed concerns regarding visitor confusion about the extent and linking of the site elements, Valhalla to beach to museum to galleries to Visitor Center. In my opinion, any confusion is due to the lack of direction and lack of effective - or any - description of what is at the site. Major roads still will not solve that. Simple signing could. Engage the Disney professionals who help others with crowd control solutions.
Forest Service Response: *Improved signage is proposed under all alternatives.*

Comment 38-8: The site is so special. It has been preserved for so long without harm. I believe that less is more in making improvements for crowd and traffic control without changing what cannot be changed back.
Forest Service Response: *See response to comment 7-3.*

Comment Letter 39 – Reynolds Duncan
Comment 39-1: I am supportive of the proposed stormwater BMPs, fencing/slope stabilization along Kiva Beach, Kiva Point parking, and parking area near Hwy 89 under Alternatives 2 and 3.
Forest Service Response: *See response to Comment 1-1.*

Comment 39-2: I am supportive of the Kiva Point BMPs, Tallac public parking lot, Valhalla parking lot, and volunteer campground as described under Alternatives 2.
Forest Service Response: *See response to Comment 1-1.*

Comment 39-3: I believe the vehicular circulation is better under Alternative 3 that Alternative 2 because it does not destroy the old road used to take guests to the Tallac Hotel complex and leaves most of the site as it is, however it may be better to leave the entrance to the Visitor Center as it is. I also support the non-vehicular circulation described under Alternative 3 but suggest including the movement of bike path crossings as shown in C1 and C4 of Alternative 2.
Forest Service Response: *See response to Comment 1-1. The deciding official has the option to combine some combination of components of the proposed action and alternatives as described in Section 1.7.*

Comment 39-4: I support the Polo Field parking as described in Alternative 3, but recommend using porous pavers – when done correctly the parking area is invisible.
Forest Service Response: *See response to Comment 1-1. Alt 3 includes the option to use porous pavers as a surface material for the Polo Field.*

Comment Letter 40 – Catherine Whelan, Lake Tahoe Historical Society
Comment 40-1: The LTHS prefers Alternative 3 as this alternative continues to concentrate visitor vehicular access to the west of the Tallac Historic Site and does not encourage additional foot traffic through the site. BMP's are limited to the beach area north of the historic site and to our knowledge are not to be installed in or about the historic gardens and buildings. The LTHS encourages the addition of a bicycle path through the forested area to the south of the historic site.
Forest Service Response: *See response to Comment 1-1 and 14-1.*

Comment 40-2: The routing of a new road through the heart of the Tallac Historic Site as proposed by Alternative 2 will harm the "atmosphere of tranquility", "sense of timelessness", and eliminate the "emphasis on non-motorized access" by introducing motor vehicle traffic to the heart of the historic site. The LTHS understands there is already motor vehicle traffic to the heart of the site but this traffic is minimal, being only service, employee, and volunteer vehicles, and the occasional event traffic at Valhalla.
Forest Service Response: *See response to comment 7-3.*

Comment 40-3: The loop road proposed in Alternative 2 will redirect ALL visitor vehicular traffic very close to the historic site running through the forested area south of the site. Noise and exhaust pollution will increase as visitors repeatedly circle the loop looking for a parking spot and idle as passengers are offloaded in the previously isolated area. These passengers will likely create new user defined pathways and damage the forest floor as they drag their beach and picnic supplies to the lake. Additionally, foot traffic to the lake through the historic site will increase putting the historic gardens at increased risk.
Forest Service Response: *See response to comment 1-2 and 7-3. Concern regarding creation of new user trails is not supported by evidence. All alternatives propose improved pedestrian pathways and barriers to prevent user-created trails where necessary.*
Comment 40-4: The singular benefit of Alternative 2 is the bicycle path that parallels the loop road. The paved path through the historic site currently serves as the primary bicycle path along the lake. Large groups of cyclists frequently ride through the site ignoring the signs asking that the bicycles be walked. Additionally, bicyclists travel through the site at high rates of speed as they "commute" to the beach or drift off the bike path near the highway. The installation of a bicycle "thoroughfare" around the historic gardens and buildings as proposed in Alternative 2 would be a welcome addition to Alternative 3.
Forest Service Response: *See response to Comment 1-1 and 39-3.*

Comment 40-5: The LTHS understands BMP work will occur along the beach edge to the north of the historic site and that no BMP work is to be performed within the historic gardens, grounds, or around the historic buildings. Even so, the transport of BMP materials and construction equipment should be restricted from the garden and grounds area.
Forest Service Response: *Chapter 2 of the EA describes the alternatives including project design features. See response to comment 14-1.*

Comment Letter 41 – Jaqueline Mittelstadt, Jameson Beach Property Owner's Association
Comment 41-1: Public participation was not sufficient. Although the Tallac EA alleges that it sent letters to interested and affected stakeholders, it failed to provide notification to a major stakeholder, namely the JBPOA.
Forest Service Response: *See response to comment 27-1.*

Comment 41-2: An Environmental Assessment is insufficient. An EIS or Programmatic EIS is required. A proposal for a site-specific project triggers the need for a site-specific EIS.
Forest Service Response: *See response to comment 1-7. Chapter 3 describes the environmental effects from project elements in the EA and no significant effects were identified, therefore the development of an EIS is not required.*

Comment 41-3: NEPA requires a programmatic EIS relating to the South Shore Corridor.
Forest Service Response: *See response to comment 41-2.*

Comment 41-4: Despite the Forest Service acknowledgement of the proper definition of cumulative effects, it fails to actually analyze the cumulative effects of this project combined with the Camp Rich project.
Forest Service Response: *Cumulative effects are discussed and analyzed in Chapter 3 of the EA, including cumulative effects from the Camp Richardson Resort Campground and Vehicle Circulation BMP Retrofit.*

Comment 41-5: By committing to project elements in the Tallac EA, the USFS is necessarily eliminating solutions to the existing problems at Camp Rich.
Forest Service Response: *See response to Comment 37-1. Activities within the project area described and analyzed in this EA do not eliminate opportunities to resolve management issues in other areas of the South Shore Corridor, including Camp Richardson Resort.*

Comment 41-6: The effects of this project are highly uncertain, and require the preparation of an EIS and more likely a programmatic EIS.
Forest Service Response: *The effects of activities proposed in this EA are not uncertain. See response to comment 41-2.*

Comment 41-7: The failure of the Forest Service consultants to accurately understand the project area (i.e. the South Shore corridor as a whole) and the existing conditions, as well as evaluate all of the alternatives being considered globally, undercuts the agencies' [sic] reliance on these opinions. The opinions do not contain substantial data, nor reasonable opinions. Consequently, the agencies' [sic] reliance thereon for its conclusions is insufficient to satisfy the requirements of NEPA.
Forest Service Response: *See response to Comment 37-1. The EA is consistent with law, regulation, and policy, including reliance on consultant reports and the conclusions of those reports.*