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**Upper Truckee River Restoration – Golf Course Reconfiguration Project PAAEA:
Comments of Mother Lode Chapter Sierra Club**

Thank you for the opportunity to comment on the Preferred Alternative and Additional Environmental Analysis for the proposed Upper Truckee River Restoration and Golf Course Reconfiguration at the Lake Valley Recreation Area and Washoe Meadows State Park.

Introduction

The Sierra Club has been working since 1892 to protect communities, wild places, and the planet itself. It is the oldest, largest, and most influential grassroots environmental organization in the United States, Founder John Muir appears on the back of the California quarter. The Mother Lode Chapter represents 16,500 members all groups in 24 counties of northern and central California.

This important project can achieve a very critical goal-- restoring the Upper Truckee River as much as possible to increase floodplain areas, enhance water quality, raise groundwater elevations, and improve riparian habitats. However, these comments emphasize that 1) how the river is restored and 2) in what manner the golf course is reconstructed will have different, significant impacts on a third essential, but not yet stated, dimension-- preservation of a wild state park. Project conceptualization (reflected in the title) reflects lack of acknowledgement of these three important dimensions valued by multiple communities. This is a fundamental flaw that has run through all the documents and processes since inception almost two decades ago. Win – Win solutions are possible, but have not yet been identified and can't be implemented until preservation of the park is explicitly placed on equal footing with the two project elements reflected in the project title.

In these comments we address:

- Separating the issues of river restoration and golf re-configuration
- TRPA's responsibility to attain and maintain thresholds
- comparative impacts of Alternatives
- economic feasibility report
- access to the Upper Truckee River in Washoe Meadows State Park
- water quality,
- removal of forest habitat,
- threats to wetlands and fens, and
- State Parks' duty to disturbed lands.

We conclude: Sierra Club Mother Lode Chapter opposes Alternative 2B and urges changed circumstances, recent cumulative project impacts and plausible, feasible new alternatives be developed and evaluated with the goal of redesigning the project to 1) restore the river; 2) preserve Washoe Meadows State Park; and 3) reconfigure the golf course.

River restoration and golf course reconfiguration should be separated.

As currently conceptualized, this project has two elements: river restoration and golf course reconfiguration. These should be separated and an equally important third element-- preservation of Washoe Meadows State Park-- should be added.

Mother Lode Chapter unequivocally supports river restoration. A healthy, naturally functioning Upper Truckee River would be good in its own right, good for Washoe Meadows State Park and, if done effectively, good for the clarity of Lake Tahoe.

River restoration requires changes to golf because the golf course encroaches on the river. Lake Valley State Recreation Area (the golf course) has a general plan, as well as a river management plan. We support those plans as written before illegally changed by Parks. They call for river restoration and reduction in the area of the golf course. State Parks should implement those plans.

Alternative 2B is inconsistent with State Parks mission, regulations and California state statutes and case law.

Alternative 2B doesn't comport with the mission of State Parks nor the settlement agreement and statute leading to the acquisition of Washoe Meadows State Park itself. It is inconsistent with the

adopted purpose of the Park, and regulations that preclude permanent commitment of the resources of a state park unit without a general plan.

Washoe Meadows State Park does not have a general plan. Under state regulations, it is impermissible to permanently commit the resources of a state park unit without a general plan. Changing the park boundaries through a land swap, building golf course holes and a bridge permanently commit resources of the Park and is illegal.

A general plan for the park must be completed before any proposal to relocate golf holes or any other use of the park. Because of this, proceeding with Alternative 2B will delay restoration of the river. Alternative 3 can be pursued for the most expeditious river restoration and the best opportunity to contribute to achievement of thresholds for which the TRPA is responsible. Only after a general planning process *for the park* occurs, if the results embrace expanded golf it could proceed legally.

For additional detail on the complex legal dimensions of this project, we by reference herein request you include in the administrative record detailed legal arguments presented in Brief of Amicus Curiae Center for Biological Diversity and Sierra Club in Support of Respondent Washoe Meadows Community (Case No. A145576; March 22, 2017).

TRPA's duty is threshold achievement.

TRPA's responsibilities are to attain a broad range of thresholds. These do not include golf, the economics or politics of golf nor State Parks' or State of California's budget challenges.

The project will affect TRPA thresholds, many of which are currently out of attainment and which will be further harmed by Alternative 2B, e.g., water quality, air quality, vegetation/forestry, and SEZs. TRPA should require a thorough environmental analysis of how the alternatives would affect TRPA thresholds, (e.g., what are the impacts of the expanded fertilizer use in Alternative 2B on nitrogen and phosphorous levels?), then rank the alternatives according to their environmental impact, i.e., their contribution to attainment of TRPA's thresholds.

As described in the EIR, Alternative 5, *full* river restoration with golf course removal and meadow restoration, would contribute most toward meeting thresholds. From a TRPA threshold perspective, the next greatest contribution would emerge from full river restoration with golf area on the east side of the river reduced or relocated on parcels not in the state park.

Alternative 3 is superior to Alternative 2B.

On the merits, Alternative 3 is superior to Alternative 2B, in key dimensions that at least in part relate to the thresholds:

1. Alternative 2B would decrease plant structure and diversity, converting large acreage of forest to the monoculture of non-native golf “habitat”.
2. Alternative 2B would increase activity that could threaten uncommon plant communities including wetlands and Fens.
3. Alternative 2B would increase activity that could impact sensitive species such as the Sand Lily (*Leucocrium montanum*).
4. Alternative 2B would threaten wildlife species of special interest, such as *the* northern goshawk, specifically included in TRPA's threshold requirements.
5. Alternative 3 will achieve adequate revenues from golf, one of the goals stated in the environmental documents.
6. Alternative 2B would preclude much of Washoe Meadows State Park from fulfilling the vision of the settlement agreement and legislation that resulted in the acquisition of the Park. Alternative 3 would preserve the opportunity for Washoe Meadows State Park to be a park of the kind that complements the finest state park system in the country.
7. Drainages in the study area run down slope, roughly perpendicular to the river. The golf course of Alternative 2B would cross them. The environmental documents underestimate the impacts golf course construction and operation would have on the hydrology of the Park, especially its wetlands and fens.
8. If implemented, under Alternative 2B golf would parallel the river on one side or the other for much of the length owned by the state (well over a mile), bracketing the river and severely limiting access to the river corridor by Park users. 100 foot separation between river and golf is patently inadequate to protect river habitat and quiet recreation values. Only limited information is readily available in the EIR regarding the distance from the golf course to the river for Alternative 2B. For example, it notes that approximately 1,300 linear feet of the golf course will be within 50 feet of the river.
9. Fish habitat could be improved under both Alternative 2B and 3, but the fishing experience would be poor in Alternative 2B because of the proximity of golf course visual, noise and aesthetic impacts on the river riparian zone.
10. The impact on water quality would be less under Alternative 3 than Alternative 2B because less area would be managed monoculture grasses, which require pesticides, fertilizers and maintenance activities (*e.g.* mowing) which pollute water and air and generate noise.
11. The golf course of Alternative 2B would generate noise from golf play and golf course maintenance activities such as mowing and sprinkling.

12. Compared with Alternative 2B, Alternative 3 would restore more SEZ and more floodplain/meadow.

The golf course economic feasibility study is flawed.

The economic analysis uses incorrect assumptions and poor methods to reach incorrect conclusions:

- the jobs estimate is for "full and part-time jobs; on a full-time equivalent basis, the actual number of jobs would be less than half that asserted.
- to illustrate revenues, expenses, golf rounds and payments to state parks, the analysis averages data from subject years, rather than looking at specific years that in general reflect a declining trend. A better reflection could be developed by providing data on actual golf play nationally broken down by age group, while providing actual annual data for Lake Tahoe play 1990-2017, with a trend line estimated through 2020.
- the analysis uses a survey of too small a sample (not statistically significant) of the wrong people e.g., current rather than future golf clients.
- despite State Parks pessimistic conclusions and dismissal of a 9-hole course, the record should show there are 170 such courses in California; the PAAEE gives no consideration to 12-hole courses, of which several already exist in California and which have garnered international acclaim and attention. The 12-hole course option, completely ignored in the development of alternatives, is an ideal solution to balancing the multiple goals of river restoration, continues golf recreation and revenue and preservation of the Washoe Meadows State Park. Failure to analyze feasible and potentially optimal alternatives for 1) technical river restoration approaches equivalent to alternative 2B; or, 2) least impact golf hole relocation footprints is a clear inadequacy of the environmental documentation.
- unfathomably, the analysis appears to rely on assertions of some local golfers that they would not play and visiting golfers would disappear if the course were no longer 18 regulation holes. There is little defensible basis in the record or anywhere to make this assumption, particularly in the face of trends of younger generations wanting to do varied and physical activities (day hikes, mountain biking, rock climbing) in short time periods. Indeed, it is these generations that will be in the mainstream of visitation in future decade(s) as the proposed reconstruction is completed.

Access to the river would be reduced under Alternative 2B.

If five holes of the golf course are moved into the park with the configuration proposed in the PAAEE (as is asserted to be necessary without adequate analysis or consultation), virtually the entire river through the Park would be paralleled visually or actually (on one side or the other) by golf, often within distance of 100 yards **or less**. Again it should be noted that because the environmental documents are extremely dated, they do not analyze reasonable, plausible win-win golf configuration options, such as a 12-hole golf course. With rising interest worldwide, handicaps for such a course are being developed and will be available long before ground is broken on this project. This design is clearly a way to achieve and balance among, all three key goals: restoration of the river, continuation of vibrant golf/revenue and protection of the state park (no disruption to the park would be necessary, no boundary change and no irrevocable commitment of state park unit resources without a general plan.

Water Quality will be diminished under Alternative 2B.

Alternatives 2B, 3, and 5 are designed to fully restore the river and reduce the amount of sediment that erodes from the river channel and in the amount of sediment and nutrients deposited on the flood plain in storm events.

The important strides made by golf in general and the Lake Tahoe Golf Course in particular in being better stewards of the land they occupy. The programs of Audubon International have helped golf reduce its environmental impacts. TASC has no doubt that the intentions of State Parks would be to make Alternative 2B more environmentally aware than the current course.

But golf has unavoidable runoff of sediment, nutrients, and chemicals. Alternative layouts with five holes on the western, upslope side of the river would subject the river to this runoff, possibly threatening the trout fingerlings that could be produced if the specific technical approach to restoration of the Upper Truckee River is successful. Success would require 2B to be implemented without major blowouts such as occurred during the USFS restoration of an adjacent stretch of river. Indeed, the net effect of restoration may well help reduce streambank erosion of sediments and other benefits including mid-lake clarity; unfortunately, no certainty exists that the net benefit will actually be positive given the huge quantities of materials to be excavated transported and replaced.

No matter, the addition of more nutrients and other chemicals, as would occur under Alternative 2B, is likely to degrade the nearshore environment of the Lake because nitrogen released by fertilizer is highly soluble and will percolate through the glacial moraine into the river. Increased nitrogen levels in the lake will result in increased growth of invasive plants such as the Eurasian milfoil already taking hold on the river bottom, and will add nutrients to

the lakes nearshore. Given the poorly understood and speed in decline of near-shore, the risk of adding nutrients such as Alternative 2B is high.

Key forest habitat adjacent to river/springs would be removed by Alternative 2B.

Alternative 2B would result in conversion of near-river upland habitat—of which there is a limited quantity in the Tahoe Basin. Lost would be an essential component of a combination of ecosystems, along with riparian corridor and the wet and dry meadows that provide multiple benefits to wildlife. The river, the park and its creatures would be negatively impacted by loss of the forest and complex associated components.

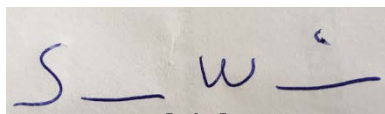
Alternative 2B Would Threaten Wetlands and Could Undermine Unique Fens.

In addition to essential and exceptional riparian habitat, among the principal reasons for the protection of Washoe Meadows State Park in the first place was the presence of fens and wetlands. Alternative 2B is improved but still not adequately analyzed and not an adequate distance from the largest and most important of the fens and encroaches on wetland areas.

Incorrect Characterization-- Locating golf course holes on "disturbed lands"—State Parks duty to rehabilitate disturbed lands.

Land on the west side of the river to be occupied by golf course under Alternative 2B is often described as "disturbed." It is inferred that it would be a benefit to replace this 'disturbed' land with golf, a false comparison. If this land is the source of sediment runoff because it is disturbed, then it should be reclaimed no matter what. State Parks owns and is responsible for that land and its function. Just as any other landowner, it is responsible for meeting schedules and requirements to install Best Management Practices that contribute toward the TRPA and the Basin meeting the thresholds specified in the Compact.

Respectfully submitted,



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