

Incline Village/Crystal Bay Citizen Advisory Board

Minutes of the regular meeting of the Incline Village/Crystal Bay Citizen Advisory Board held on February 26, 2024, at 5:30 p.m. at 845 Alder Ave., Incline Village, Nevada 89451

1. CALL TO ORDER/ DETERMINATION OF QUORUM

Kevin Lyons, Diane Becker, Roxanna Dunn, Chris Wood, Carla Werner, Denise Davis (absent)

A quorum was established, and the meeting was brought to order.

2. PLEDGE OF ALLEGIANCE

The pledge of allegiance was recited.

3. GENERAL PUBLIC COMMENT

The first commenter, Margaret Martini from Incline Village, expresses concern about the environmental impact study from 2017 and criticizes Plaster County's proposal. She argues that the proposed plans could result in evacuation challenges, traffic issues, and lack of consideration for fire safety parameters. She urges Washoe County to reconsider such developments and emphasizes the importance of effective and safe evacuation and urban planning.

Following Margaret, Rhonda Tycer raises a question about a statement made by Alexis Hill at a previous meeting regarding the need for large parking lots in the regional transportation plan. Rhonda seeks clarification on TTD's intention to build a large parking lot in Incline Village and expresses concerns about potential impacts on traffic and residential neighborhoods.

Overall, the public comments highlight concerns about environmental impact, traffic issues, and the need for clear safety parameters in proposed developments.

4. ANNOUNCEMENTS FROM COMMISSIONER HILL

Commissioner Alexis Hill provided an update on the Tahoe Connect 3 Zone service, stating that funding has been secured pending public meetings of RSCVA and RTC. The service is expected to remain unchanged, and details can be found on the TMA website. Commissioner Hill expressed excitement about the funding and partnerships to support the service.

During the Q&A session, Tim Delaney, a longtime Incline Village resident, voices concerns about large buses coming into the community and objects to schemes that bring more people into the region. He specifically mentions opposition to bike trails and large parking lots, expressing a desire to preserve the environment and respect Native American communities. Tim questions Commissioner Hill about the need to bring more people into Incline Village and urges the authorities to leave the town alone for the sake of the environment. Commissioner Hill responds by stating they are working to reduce the number of cars in the basin through an improved transit system. She acknowledges Tim's comments and thanks him for sharing his perspective.

5. PUBLIC SAFETY UPDATES

North Lake Tahoe Fire Protection District Chief Ryan Summers provides information about decreased call volumes due to minimal snow and announces the acquisition of equipment through FEMA grants, including self-contained breathing apparatus and a device for performing CPR on patients.

A community member raises concerns about the availability of fire insurance for homeowners' associations (HOAs) in the region.

Lieutenant Joe Colacurcio of the Washoe County Sheriff's Office gives updates on staffing, introduces the new Incline commander, Captain Amelia Galicia, and discusses upcoming initiatives, such as getting Marine 9 back on the water and implementing an e-bike program.

Public comments express gratitude for the efforts of the fire department and raise concerns about fire insurance for HOAs and the impact of increasing development on insurance availability. There's also a request for written statistics to be shared on the CAB website. The discussion concludes with an acknowledgment of the upcoming "State of the Sheriff's Office" report and a suggestion to address e-bike rules at future meetings.

6. TAHOE TRANSPORTATION DISTRICT (TTD)

TTD District Manager Carl Hasty noted that the consultant team, HDR, is evaluating an old elementary school site and alternative locations for a mobility facility. HDR is finalizing a technical report on transit system needs and their relation to land use, with completion expected by June. The report is crucial for satisfying Federal Transit Administration requirements for an alternative site assessment, but additional project exploration beyond the report is ongoing. Discussions with the Federal Transit Administration and Washoe County are planned to explore policies and transportation needs. The district is considering options with property owners, including UR, to address community concerns about visitor parking. The emphasis is on multimodal solutions, seeking alternatives to personal vehicle use and balancing parking needs for the community. The community will be engaged through virtual formats to discuss presented information before any decisions are taken to the TTD Board.

Diane Becker expresses concerns about public transportation and parking around Lake Tahoe, emphasizing the desire for good public transportation without large parking lots.

The district acknowledges community input and highlights the focus on multimodal solutions, aiming to find alternatives to personal vehicle use and balancing parking needs for the community. The district mentions ongoing discussions with the county for improvements, such as bike tie-ins and safety enhancements on the highway, to address internal community needs. The district outlines various

measures being considered, including expanding transit services on Highway 50 and Mount Rose, creating additional parking areas, and pursuing a piece-by-piece approach. The district acknowledges that solutions may be slower than desired but emphasizes the ongoing effort to address transportation challenges in a comprehensive manner.

Diane Becker sought specific actions taken to explore alternatives to the mobility hub, mentioning the possibility of large parking lots in Truckee or bringing people by bus from Carson City.

The district responds, indicating that funding is a key challenge, and there are limitations in transit operating dollars for running services from Reno to Incline Village throughout the summer. The district highlights the need for more buses, drivers, and operating funds to implement a broader transit service, particularly for bringing people from outside the Tahoe Basin into the area. The district notes that the current focus is on addressing internal transportation needs within the Tahoe Basin before expanding services to destinations outside the basin. Concerns are raised about the system's capability to distribute people effectively if brought from outside the basin without a well-established internal network.

CAB member Kevin Lyons expresses concern about the current approach, stating that building parking lots first and then planning for distribution may not be the most effective strategy. The community member suggests looking into successful models in other areas, such as offering frequent and free or low-cost transportation services to reduce reliance on personal vehicles. The question is raised about finding funding to address parking issues in the basin before expanding transportation solutions from Reno and Truckee.

The district acknowledges the challenge of finite land resources, funding limitations, and the need for a comprehensive regional approach to address the issue. The district emphasizes the importance of regional consensus and discussions around establishing revenue sources for larger-scale transit solutions. The discussion mentions ongoing planning processes, such as the master planning for Sand Harbor, and the need for a regional approach to solve the transportation problems. The district acknowledges the complexity of the issue, highlighting the challenge of providing alternatives to personal vehicles due to the inability to restrict people from coming to the area. The cost and scale of proposed solutions are discussed, with mention of the potential need for hundreds of millions of dollars for a comprehensive regional transit system.

Kevin Lyons suggests focusing on specific problems like Sand Harbor and finding cost-effective solutions, such as using existing parking lots at Mount Rose with a shuttle to Sand Harbor.

The district agrees to provide more information and back-of-the-envelope calculations on potential solutions, emphasizing that the consultant is not specifically tasked with solving this problem. Questions are raised about the consultant's role and whether the consultant will provide answers to specific transportation problems, to which the district responds that the consultant's focus is on broader planning aspects.

CAB Member Roxanna Dunn outlines what they believe the primary target ridership for the transit system would be, including tourists and workers who may not need personal vehicles for commuting. Roxanna Dunn raises questions about whether the district provides input at Washoe County Commissioner meetings and TRPA (Tahoe Regional Planning Agency) board meetings to address policies that might conflict with the goal of reducing reliance on cars. Three specific policies are mentioned as potential obstacles to achieving transportation goals: 1. No cap on short-term rentals (STRs) in Washoe County, potentially causing tourists to rely heavily on personal vehicles. 2. Rezoning of special area one to allow luxury condos, which could lead to higher-income residents using personal vehicles. 3. Inclusionary housing policies that might lead to the trading of locations, placing workers away from transit lines and luxury housing next to bus lines.

Roxanna Dunn emphasizes the need for the district to stand up against policies that might subvert its transportation goals and requests the district to look into the mentioned issues.

The district acknowledges that it works with TRPA and the county and expresses awareness of the complexity of affordable housing issues. The district recognizes the importance of urban centers and density for transit effectiveness but acknowledges the specific concerns related to the mentioned zoning decisions in Incline Village.

Margaret Martini strongly opposes the mobility hub, stating that there is no need or want for it in Incline Village. They express dissatisfaction with the county's support for the mobility hub and larger developments, indicating that these projects may lead to problems necessitating the hub. The speaker believes that the village lacks the workforce base required to justify the construction of a mobility hub. The community member accuses the county of not supporting the residents of Incline Village and suggests that the county is backing larger developments, contributing to the perceived need for a mobility hub. They emphasize the need for the county to listen to the residents and address their concerns rather than pushing for the mobility hub. The speaker acknowledges the efforts of the sheriff in addressing parking issues along the east shore of the lake. They express gratitude for improved parking conditions and signs near Sand Harbor, suggesting that continued ticketing will discourage illegal parking. The community member suggests that people may opt for alternative locations with available parking space, such as South Lake Tahoe with casino parking lots or Tahoe City, where a large mobility hub already exists. Margaret further calls for County Commissioner Alexis Hill to respond to the concerns raised by residents regarding the special area one rezoning and high-priced condos.

John Eppolito asked that Commissioner Hill address the concerns brought up by Roxanna Dunn, to which the CAB Chair notes that this can be brought up in General Public Comment, as this is strictly for questions on the TTD Mobility Hub.

A public commenter raised a question about the expansion of parking lots, particularly around Spooner, and whether a bus service will be implemented to move people around the lake and asks if parking bans or crash barriers will be introduced to prevent road-side parking.

The response emphasizes that the parking lot expansion aims to relocate parking off the shoulder rather than increase capacity. Enforcement measures, including banning parking and relocating capacity, are mentioned.

The discussion delves into why the focus is on relocating parking rather than increasing capacity. The speaker explains that dangerous parking on the shoulder and off the highway is a concern. The goal is to provide alternatives and move people through more efficiently, discouraging all-day parking. The speaker mentions challenges related to topography for building large lots.

The discussion shifts to the topic of ticketing for illegal parking. Concerns are raised about the lack of enforcement, and the question is posed regarding ticketing on the route from 28 to 50. The speaker acknowledges the difficulty in providing enforcement consistently due to jurisdictional challenges. There's mention of ongoing efforts and increased synergy to address parking enforcement.

Questions are raised about how residents can engage with authorities to encourage ticketing for illegal parking.

The District suggests that addressing the issue involves engaging with county sheriffs, the State, and relevant authorities. There's an acknowledgment of the dangers associated with illegal parking. The speaker expresses uncertainty about the State's ability to handle ticketing due to resource constraints.

Carole Black noted that as a member of the now-disbanded Incline Village Mobility Hub Committee, Carole expresses confusion about the approach to solving the issues discussed. The concern is raised that building more parking lots in Incline Village may not address the root causes of traffic issues. Carole points out that the majority of traffic issues on Route 28, especially in the summer, are attributed to visitors coming from California or over Mount Rose. The suggestion is made to prioritize intercepting traffic before it reaches Incline Village, potentially at locations like Mount Rose. The speaker recommends providing transit services that people would use to reach their destination rather than focusing solely on building more parking. Carole argues for a different prioritization and a reconsideration of the approach, emphasizing the need for root cause analysis to effectively address the primary drivers of traffic issues.

Tim Delaney advocates for prioritizing enforcement measures, suggesting that raising ticket prices and impounding vehicles could discourage visitors from coming to North Shore and the east shore of Lake Tahoe. The suggestion is made to use the revenue from increased ticket prices to fund police officers in Incline Village. Additionally, he recommends providing affordable housing for local officers. Tim draws a comparison between the enforcement practices of his generation, where individuals faced penalties, such as getting tickets, having cars impounded, and even being thrown in jail, and the perceived leniency in dealing with the current generation. Tim questions the concept of encouraging more people to visit through parking solutions and buses. He emphasizes that the discomfort of crowded beaches may not be desirable and suggests reconsidering the approach. The main question posed is why there isn't a focus on enforcing strict measures first, using the threat of high fines and impounding to discourage unwanted behavior before investing in building parking lots and

transportation infrastructure. Tim expresses concern about the environmental impact, suggesting that the influx of visitors, similar to events like Burning Man, could lead to the destruction of the area.

The District states that they will be back to provide more information before they go to the TTD board in June.

Diane Becker comments on the approach being somewhat backwards and suggests that the consultants need to hear more diverse perspectives and consider alternative solutions beyond the options presented during the meeting. Diane refers to the previous report having factual errors due to a lack of public input. The desire is to avoid similar mistakes and ensure the new recommendations are well-informed and to catalog all the input received during the meeting is mentioned, suggesting that it can be beneficial in providing a comprehensive understanding of public sentiments.

7. EVACUATION RESIDENT INPUT

John Eppolito noted that less is more, staying away from developments bringing in more people and having an amusement park mentality.

Margaret Martini suggested examining alternative evacuation routes and publishing them. However, there is a cautionary note about ensuring these routes are well-established before publicizing them. Concerns were raised about potential traffic bottlenecks, particularly on Route 267, and the impact of alternative routes on traffic flow. The presence of roundabouts in King's Beach is highlighted as a factor affecting access to Route 267. Emphasis was placed on leaving a lane open for emergency vehicles during evacuations. Drawing lessons from the Paradise Fire, issues such as vehicles running out of gas during evacuations are mentioned.

A public commenter asked what happens when cell towers are down? Does the Sheriff's Office drive around with a loudspeaker or go door-to-door? This was affirmed by other residents as being the case.

Carole Black highlighted the potential challenges with relying solely on internet-based communication during emergencies. She shares a personal experience where her internet and cell phone services were unreliable. Carole emphasized the importance of considering and possibly implementing recommendations that Doug Flaherty, a former fire chief, had suggested. Doug Flaherty's suggestion for a street-by-street evacuation plan is mentioned. Carole believes it's essential to carefully examine and assess the potential value of such a plan for Incline Village. Carole mentioned attending an evacuation drill last summer but notes that it was limited to one small area going to another small location. She expresses the need for a more comprehensive demonstration to assess the effectiveness of evacuating Incline Village rapidly during peak summer times.

Tim Delaney emphasized the need to address the overgrown vegetation and dense tree population in Incline Village. He suggests that about 60% of the trees should be removed to create a safer environment. This measure aims to prevent large-scale fires that could pose a threat to the community.

Tim Delaney also expressed concern about the potential release of fluids, toxins, and gasoline stored in residents' homes during a fire. He highlights the risk of such substances harming the water supply and causing environmental damage. Tim advocates for a proactive approach to manage and dispose of these hazardous materials to protect both the community and the lake. Tim criticized the current waste management system, citing difficulties in disposing of hazardous materials such as snow blower gas. He calls for more efficient waste management practices and collaboration with residents to ensure the proper disposal of potentially harmful substances. Tim touched on the issue of population density, suggesting that reducing the number of people in the area could contribute to overall safety.

Rhonda Tycer echoed the importance of a detailed street-by-street evacuation plan to address the unique challenges of different areas. She specifically mentions the concern for streets like Tyner, with a single exit point. She emphasizes the necessity of practicing evacuations on roads with limited access, such as Tyner. The goal is to assess how efficiently residents can evacuate and determine the duration it takes for them to reach designated exit points. Rhonda points out that residents need to be prepared to take care of themselves during evacuations. While firefighting efforts are crucial, residents must also know how to efficiently evacuate and manage their own safety. Proposing neighborhood-specific evacuation exercises, Rhonda suggests focusing on smaller groups to test the efficiency of evacuation plans. This approach allows for a more detailed assessment of evacuation times and challenges.

Both Roxanna Dunn and Doug Flaherty wrote in public comments/ideas that will be part of the record.

Diane Becker asked everyone to think about suggestions that can be included in the written report to Emergency Management.

8. NEIGHBORHOOD DEVELOPMENT HUB

There was no update from staff on this item.

9. APPROVAL OF THE MINUTES FOR THE MEETING(S) OF July 5, 2023, August 7, 2023, November 2, 2023, and December 4, 2023

Members of the Citizen Advisory Board shared concerns about the accuracy and completeness of the current summary format. Members express a preference for detailed transcripts as they find them valuable for referencing discussions. There's a suggestion to use AI-generated transcripts as attachments to the minutes.

Community Outreach Coordinator Alexandra Wilson mentioned that the standard will be the summary of the minutes, but word-for-word transcripts will be available upon request.

Some members expressed frustration with the current summary format, stating that it doesn't accurately capture the substance of discussions. There is also a mention of past edits and updates to minutes, and some members express the need for accurate records.

MOTION

The possibility of accepting current minutes with attached transcripts for historical accuracy is discussed, and a motion is made to accept the minutes with the provision of attaching transcripts for future reference.

Motion and second, 5-0 motion passes.

10. BOARD MEMBER ANNOUNCEMENTS/REQUESTS/DISCUSSION

Diane Becker noted that Washoe County staff will be presenting at the next meeting regarding broadband. No other announcements were made.

11. GENERAL PUBLIC COMMENT

John Eppolito notes that the board was disbanded at one point and questions the county's genuine concern for the community's opinions.

Margaret Martini echoes the sentiment, emphasizing the disrespect felt by board members when the County Commissioner departs before the meeting concludes.

Kathy Julian suggests ensuring that AI-generated transcripts become permanent records and encourages the board to review and modify summaries for accuracy.

Tim Delaney expresses gratitude to the board and addresses concerns about healthcare issues and potential damage to the community.

ADJOURNMENT - Adjourned at 7:26 p.m.

2-26-2024

Meeting date

To: members of the CAB Board of Incline Village/Crystal Bay

From: Margaret Martini, Incline Village

Please add this statement to the minutes of the meeting.

The last adopted environmental impact study was in 2017. A lot of change has happened since then.

The latest blurbs from the governmental regulatory agencies continue to rely on data from these reports and they do not make aggressive moves to update to current status.

Placer County's proposal is poorly thought out and a bad idea. Is Washoe County going to parrot Placer County proposal. Their plan will most likely result in evacuation vehicle increases and not only from wildfire disasters. The TRPA development plans of gross density increases which are in concentrated areas already experiencing roadway over capacities is a travesty.

The basin is already classified as a **very high fire severity zone** as we are now, without all the proposed and approved new developments including in Washoe County.

Please note: none of the development plans include fire safety parameters. TRPA is also oblivious to fire safety issues...among other unsound practices. One can only hope that Washoe County will put some brakes on. Commissioners should not bring unsound development to our county.

Look up the definition of "choke points". The development plans create choke points.

The proposed plans by the agencies and counties are pie in the sky plans that align and therefore create the significant traffic/escape issues NOT addressed by the agencies...resulting in putting people at extreme fire evac danger.

Informed planning decisions which should include evac plans for day/night occurrence, wind direction, emergency vehicle access, road evaluation capabilities and many more important factors.

While we all gratefully appreciate Chief Sommers and staff efforts for defensible space the great possibility of out of control or tree top based wild fire is a very distinct possibility their efforts may not be enough to contain the type of wildfire that seems to be the norm so effective and safe evacuation and urban planning need to be a first consideration and it is clearly NOT...starting with the TRPA.



IVCB CAB discussion on Evacuation (agenda item 7, Feb-2024 meeting)

1 message

Mon, Feb 26, 2024 at 11:38 AM

roxanna dunn <roxanna_dunn@yahoo.com> To: Alexandra Wilson <ALWilson@washoecounty.gov> Cc: diane Heirshberg <dbheirshberg@gmail.com>

Hello Alexandra,

Attached are my ideas regarding evacuation planning for IV/CB. As they are long, I am sending this to you electronically so you can add them to the official minutes.

Roxanna Dunn

A. Plan development, metrics and data collection

1. Include IV/CB representatives on plan review boards. Present segments of draft plan at CAB and Community Forum meetings.

2. Develop population estimates and evacuation metrics for peak season (July-August) and shoulder season (September-November).

3. Identify single road ingress/egress neighborhoods (Upper Tyner, Tyrolia Village, others?) and a) develop a plan for traffic controls of these areas, b) assess evacuation times and use such metrics to limit additional development of density-increasing units like multi-family, ADUs, STRs in these areas (see A.10 below)

4. Test "blue book" assumptions about traffic load on 431 by measuring vehicle movement at 4:00 pm on a Saturday during ski season. Ditto, SR 28W through Kings Beach and SR 28E at Sand Harbor mid-day on July 4 weekend.

5. Identify and develop capacity numbers for shelter-in-place centers (e.g., high school, Rec Center) with forest maintenance requirements and other safeguards specified for each. Factor in parking limits at these locations.

6. Plan for buses/ferries to evacuate hotels and Sand Harbor.

7. Support Tahoe Douglas Fire Department fund raising to provide two local helicopters for use in rescue and firefighting.

8. Remove passive voice from the current plan and avoid it in future write-ups. Replace text with tables, flow charts, and other graphic representations that can be readily referenced.

9. Coordinate plans with Kings Beach.

10. Develop a process to assess the evacuation impact of new development and include this as a required step in the permitting process.

B. Infrastructure and environment improvements

1. Widen shoulders and add turn-outs on SE 28.

2. Design and develop east shore bicycle path for use as an additional vehicle evacuation route. This would need to run all the way to Hwy 50.

3. Establish a reservation system at Sand Harbor with a buffer number of reservations opened the week before reservation date only if fire danger is low. Collect visitor data during reservation to be used a) to issue warrings, and b) to locate the missing after a wildfire event.

4. Run a communication drill without cell phones to simulate cell phone tower failure.

5. Add provisions a) for managing trees that could fall across egress roads and b) for removing them if the / fall during an evacuation.

6. Consider using Mount Rose Ski area for emergency services such as shelter-in-place encampment, clir ic for injured.

7. Identify temporary storage areas (e.g., available school or arena parking lots in Reno and Carson) for s∈ cond cars, boats, RVs, and trailers evacuated during Warning and Optional stages. Think about this one - don't want to encourage people to move these vehicles once evacuation reaches Mandatory stage but do want to encourage early eracuation.

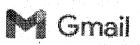
8. Educate residents on the need for additional cell towers. Use towers that do not use the coating that car pollute the lake.

C. Process of evacuation

1. Identify and educate public on evacuation stages (e.g. warning, optional, mandatory) with assigned limits to each, e.g., in mandatory stage encourage one vehicle per household and do not allow boats or trailers on egress roads. Develop criteria for stages based on population and evacuation time estimates.

2. Develop a neighborhood watch system for door-to-door warnings and evacuation of disabled and elderly people. (Note: The average age of victims in Paradise was 72 and 11 were disabled).

3. Educate residents on purpose and use of Perimeter application with an annual drill for testing it and learn ng how to use it.



Feb 26 2024 CAB Public Comment Wildfire Evacuation

1 message

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Doug Flaherty <tahoeblue365@gmail.com> To: CAB@washoecounty.gov Bcc: dbheirshberg@gmail.com

Fri, Feb 23, 2024 at 12:51 PM

Dear IVCB Community Advisory Board (CAB),

Please make this public comment part of the record and the minutes in connection with Agenda Item 7 of the February 26, 2024 IVCB CAB meeting: Evacuation Resident Input.

The chair of the CAB is requesting input from residents related to the evacuation plan including cell connectivity, evacuation routes, alerts, response times, etc.

Background

On August 16, 2022 Washoe County Commissioners adopted the Evacuation, Sheltering, and Mass Care Plan (**the Plan**) set forth by the Washoe County Emergency Management and Homeland Security Program.

https://www.washoecounty.gov/CABS/IVCB_CAB/2023/files/Washoe-County-Evacuation-Sheltering-and-Mass-Care-Plan-2022.pdf

The August 16, 2022 motion was to authorize the then County Commission Chairman to execute a Resolution to promulgate the plan.

Current Plan Status

While the current plan contains useful information, as explained below, the information specifically related to wildfire evacuation planning within the unique geographical area of Washoe Tahoe - Incline Village Crystal Bay falls woefully short of evacuation planning best practices.

The uniqueness of Washoe Tahoe includes extreme 360 degree high hazard wildland urban interface, demonstrated wind and slope environment, daily overcapacity two lane and traffic calming roadways and "F" rated intersections, monumental visitor and parking impacts, short term rental and Picasso type home ownership population impacts as well as significant population and roadway adverse impacts including those resulting from East Shore Trail use. This includes perhaps hundreds or bicycle rental users per day during summer peak hours.

The current Plan makes many controversial assumptions that **lack substantial** best achievable data and best achievable technology evidence OR are completely disregards discussion of the following:

- 1. A comprehensive roadway by roadway evacuation capacity analysis, including all area highway and residential streets including adjoining Placer and Carson County roadways) based on best achievable data and best achievable technology.
- 2. A wide range of worst case scenario modeling based on best achievable (lata and best achievable technology to determine vehicle and population evacuation times. This includes a wide range of scenario modeling within dense Town Center evacuation choke points. *While not specifically discussing Washoe Tahoe*, <u>but to serve as just one example to help explain dense Town Center impacts</u> during a wildfire evacuation, please refer to the attached Fire Professional letter gi /en as part of public comment by non-profits TahoeCleanAir.org, North Tahoe Preservation Alliance, Friends of the West Shore and the Sierra Club in connection with Placer County North Shore Town Center wildfire impacts.
- 3. Identification of actual visitor population capacity significantly impacted by short term rentals, Picasso type shared home ownership, East Shore trail population impacts, Sand Harbor population impacts, increased population impacts from the increases in growth from the Reno, Carson and Truckee Areas. As an example the County, NV State Parks and NDOT fail to monitor precise East Shore Trail usage, which would require simple technology user counts.
- 4 Cumulative analyses of Town Center and population density impacts as a result of Washoe County and TRPA past, present and future project approvals.
- 5. Number of vehicle evacuation claims i.e. Incline Village
 - Population 8,669 Individuals
 - Estimated population without vehicles 754 Individuals
 - Estimated population with vehicles 7,915 Individuals
 - Washoe County Evacuation, Sheltering, and Mass Care Plan
 - o 61
 - Estimated personal vehicles to be evacuated 3,824 Personal vehicles
 - Estimated buses needed 18 Buses
 - Estimated total number of vehicles to be evacuated 3,842 All Vehicles
- Identification of accurate up to date traffic counts under a wide range of worst case scenarios.

As a result of this discussion, in order to provide for a workable best achievable practice, based on best achievable data, utilizing best achievable technology modeling, the Washoe Tahoe portion of the Plan, based on its unique geographical area and circumstances must consider the following:

Going forward, the County must acknowledge and accept the realization that increased development and destination enticing public and private projects within the ur ique Washoe Tahoe fire-prone area increases the likelihood that more destructive fires will ignite, more habitat and people will be put in harm's way or displaced, and more structures will burn. Put simply, bringing more people into or near the flamma le Washoe Tahoe wildlands will lead to more frequent, intense, destructive, cost y, and dangerous wildfires.

Additionally the County must acknowledge that the following resident and visitor populations are not being addressed in the Wildfire portion of the Plan. The County must create a workable comprehensive wildfire evacuation plan that includes best available / achievable technology driven evacuation analyses for those on foot, including those utilizing the plethora of trails including the East Shore trail, bicycle users, TTD drop off passengers to Sand Harbor, vulnerable and underprivileged populations, senior citizens (80% of Paradise fire deaths were senior citizens), stay at home parents while spouses or significant others are utilizing the family vehicle to commute to work, and school attendance populations (wildfire history suggests that some of the worst fires have occured in September, October and November). The County must create a comprehensive wildfire evacuation plan for all residents and visitors based on best available data and best achievable technology.

Therefore, at minimum, the Washoe Tahoe portion of the County wildfire evacuation Plan must include a comprehensive analysis and discussion based on substantial evidence as follows:

A. Comprehensive best achievable data driven, best achievable technology driven wide range scenario modeling evaluation of the capacity of all roadways within and outside the Washoe Tahoe area to identify and accommodate past, present and planned project and community evacuation and simultaneous emergency access. B. Data / technology driven modeling assessment of the timing for evacuation.

C. Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency as identified in comprehensive scenario modeling.

D. Evaluation of cumulative past, present and planned public and private project impact on existing evacuation plans.

E. Consideration of the cumulative impacts of past, present and planned public and private project adequacy of emergency access, including the project's proximity to existing fire services

and the capacity of existing services.

F. Data / technology driven traffic modeling to accurately quantify travel times under various likely scenario modeling.

G. Consider impacts to the current evacuation Plan, but recognize that, depending on the scope of the existing

wildfire evacuation plan, additional data / technology driven analyses or project-specific plans may be needed. The current Plan

identifies roles and responsibilities for emergency personnel and main corridor evacuation routes, but do not

consider the capacity of roadways, provide accurate data / technology driven timing for community evacuation, or identify alternative plans for

evacuation depending upon the location and dynamics of the emergency.

H. Develop data / technology driven thresholds of significance for evacuation times. These thresholds

should reflect any existing planning objectives for evacuation, as well as informed expert analysis and best practices to help achieve safe and

reasonable wildfire evacuation times given the past, current and planned future private

and public projects.

I. Per best available / achievable data / technology driven modeling, consider whether any increase in evacuation times for the local community would

have a significant impact. The conclusion that an increase in evacuation times is a less than significant impact

should be based on a threshold of significance that reflects community-wide goals and standards. Avoid

overreliance on shelter-in-place locations. Sheltering in place, particularly when considered at the community planning stage, can serve as a valuable contingency, but it

should not be relied upon in lieu of analyzing and mitigating past, current and uture private and public project evacuation impact.

Sincerely, Doug Flaherty Incline Village, NV Resident

> 94 23

Attachment A - Fire Dept Retired Professionals Letter.pdf 2155K

ATTACHMENT A

Opposition to Placer County 2023 Tahoe Basin Area Plan (TBAP) and EIR Addendum

Letter From Retired or Former Fire Department Professionals and Volunteers

TBAP = The Placer County Tahoe Basin Area Plan

EIR = the 2016 Certified Environmental Impact Report adopted in 2017

EIR Addendum = the current Placer County proposed EIR addendum to the TBAP made public at the August 10, 2023, Placer County Planning Commission Meeting

EEPEP = Placer County 2015 Eastside Emergency Preparedness and Evacuation Plan (EEPEP) LOS = Loss of Service

Dear Placer County Board of Supervisors,

Based on our individual and combined emergency fire and life safety response experience, we oppose the 2023 TBAP changes and associated EIR addendum for the following reasons:

 The adoption of the amendments and supplemental EIR will most likely result in increased wildfire evacuation impacts throughout the approx. 19.5-mile long TBAP plan area, and most predominantly in "denser" more concentrated town centers and mixed-use areas. This, due to cumulatively proposed concentrated increases in building density, coverage, and planned eventual building height, as well as reduced parking and setbacks. This then, resulting in increases in concentrated human population (residents and visitors, including tourists), within town centers and mixed-use areas, functioning within an already unsafe overcapacity roadway and often LOS F roadway intersection environment.

While there exists an opinion that more concentrated development within town centers vs development outside of town centers may prevent ignitions, the reality is that the <u>entire TBAP geographical area</u>, including dense concentrated town centers and mixed-use areas exist within the **"Wildland Urban Interface Defense Zone**", and per the California State Fire Marshal, <u>the entire geographical area</u> is classified as a **Very High Fire Hazard Severity Zones (VHFHSZ).** Therefore, any ignitions, inside or outside the planning area, especially within our wind and slope environment may become out of control significantly impacting wildfire evacuation and emergency access. This then requires prudent up to date best practice life safety wildfire evacuation planning for all locations within the TBAP area, including dense town center and mixed-use areas.

2. Resident and visitor populations (including tourists) within each of the town centers and mixed-use areas individually and cumulatively represent significant concentrated populations.

Therefore, it is prudent and reasonable that life safety wildfire evacuation planning and conclusions, throughout the 19.5-mile planning area, including separately, within each concentrated town center and mixed-use areas, be analyzed, discussed, and implemented based on substantial evidence, including best achievable data, and the best available wildfire evacuation planning practices and tools.

This, to help determine, based on up-to-date data, whether or not the amendments further contribute to a significant impact on wildfire evacuation and emergency access. This includes conducting an evaluation of potential significant impacts to population safety, under a variety of potential wildfire behavior scenarios.

The current EIR, EIR Addendum and the EEPEP fail to adequately analyze or evaluate the approximate total population capacity, including individually within each concentrated town center and mixed-use area. This includes failure to provide the best achievable data driven reasonable wildfire evacuation scenarios.

This includes the failure to provide evacuation scenarios including discussions regarding the impact of increased population density on senior citizens, disabled persons, visitors who may have relied on public transportation to enter and traverse the Area, those on foot and sleeping in public facilities, all of which place EMS medical demand on emergency resources once injured or debilitated.

Photos of Paradise Fire (Camp Fire) victims and location where each victim died. https://www.kcra.com/article/these-are-the-victims-of-camp-fire/32885128

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Increased concentrations within town center and mixed-use environments will, most likely serve a: wildfire evacuation "**choke points**." This as increased and concentrated town center and mixed-use popula ion vehicles and foot traffic compete in a "**sudden surge**," impacting already over capacity evacuation roadway;, thereby further and significantly impacting the current evacuation assumptions and timing beginning on page 3.1-32 in the EIR addendum including Table 3-4 (**Attachment C**).

The EIR and EIR addendum fail to analyze, identify, and discuss the potential increased wildfire evacuation impacts, caused by these concentrated "choke points" and "sudden surge" conditions, individually and cumulatively. This includes failure to discuss or provide a variety of wildfire evacuation choke point scenarios that may result in loss of evacuation time as discussed on Page 3.1-3 of the supplemental EIR.

This includes the failure to discuss wildfire emergency evacuation scenarios, where traffic surge gr dlock may take place resulting in panic among residents and visitors who feel they have no choice but to flee into nearby Lake Tahoe Waters (Example: Lahaina Town Center).

https://nypost.com/2023/08/11/hawaii-residents-flee-into-dangerous-ocean-to-escape-wildfires- ideo/

4. The EIR, EIR addendum and EEPE fail to provide substantial discussion based on current best pract ces and data driven wildfire evacuation scenarios, throughout the entire 19.5 mile length of the TBAP area, including concentrated town center and mixed-use of which would serve to inform planners, the public and first responders of any potential significant increase in wildfire evacuation impacts within each of the projected more concentrated redevelopment existing town centers and mixed-use areas.

Page 8 and 9 of the EIR Addendum States, "the analysis found that the total development potential would not increase, but it would be more <u>concentrated in Town Centers and mixed-use areas</u> than it is preser tly and would be consistent with the Regional Plan."

Page 11 of the EIR Addendum States: "The amendments would encourage <u>more concentrated</u> redevelopment of existing Town Centers, which could result in a <u>higher proportion of residential, commercial, and to vrist uses</u> <u>being concentrated within Town Centers</u>. While concentrated development <u>could result in site-specific</u> <u>degradation of LOS</u>, the Area Plan EIR already assumed that the TBAP would result in highly concentrated development within Town Centers (See Area Plan EIR pgs. 10-13 through 10-15 and Appendix G-1) Thus, the proposed amendments would result in changes that are consistent with the assumptions underpinning the LOS analysis in Area Plan EIR. For this reason, the proposed amendments would be consistent with the Area Plan EIR LOS analysis.

The EIR, EIR addendum and EEPE fail to discuss or analyze the following significant new and best available, best practice evacuation guidance information (not known to Placer County since the 2015 EEPE and the 2017 EIR but known to Placer County Staff during their construction of the 2023 EIR Addendum). This new information is contained in the 2020 California Attorney General Guidance, under CEQA, "Best Practices for Ana yzing and Mitigating Wildfire impacts of Development Projects" of which can serve to assist planning staff, a mergency services and the public to determine whether or not the currently proposed amendments, EIR and EIR Addendum will have a significant impact more accurately on wildfire evacuation and emergency access:

<u>A List of significantly relevant 2020 Calif Atty General Life Safety Best Practices, which the EIR, 2023 EIR</u> Addendum and 2015 EEPE have failed to discuss, and analyze:

- Development in fire-prone areas increases the likelihood that more destructive fires will ignite, fire-fighting
 resources will be taxed, more habitat and people will be put in harm's way or displaced, and more structures will
 burn.
- This guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project's impacts on wildfire ignition risk, emergency access, and evacuation.
- Put simply, bringing more people into or near flammable wildlands leads to more frequent, intense, destructive, costly, and dangerous wildfires.
- A. Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access.
- B. Assessment of the timing for evacuation.
- C. Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency.
- D. Evaluation of the project's impact on existing evacuation plans.
- E. Consideration of the adequacy of emergency access, including the project's proximity to existing fire services and the capacity of existing services.
- F. Traffic modeling to accurately quantify travel times under various likely scenarios.
- G. Consider impacts to existing evacuation plans, but recognize that, depending on the scope of an existing evacuation plan, <u>additional</u> analyses or project-specific plans may be needed. Community evacuation plans often identify roles and responsibilities for emergency personnel and evacuation routes, but do not necessarily consider the capacity of roadways, assess the timing for community evacuation, or identify alternative plans for evacuation depending upon the location and dynamics of the emergency.
- H. Local jurisdictions are encouraged to develop thresholds of significance for evacuation times. These thresholds should reflect any existing planning objectives for evacuation, as well as informed expert analysis of safe and reasonable evacuation times given the existing and proposed development.
- 1. Local jurisdictions should consider whether any increase in evacuation times for the local community would have a significant impact. The conclusion that an increase in evacuation times is a less than significant impact should be based on a threshold of significance that reflects community-wide goals and standards. Avoid overreliance on community evacuation plans identifying shelter-in-place locations. Sheltering in place, particularly when considered at the community planning stage, can serve as a valuable contingency, but it should not be relied upon in lieu of analyzing and mitigating a project's evacuation impact.
- 6. Additionally, page 3.1-2 of the EIR (Attachment C) states "Emergency evacuation conditions would likely result in traffic demand that exceeds roadway capacities under any scenario and at any hour."

In the interest of prudent life safety wildfire evacuation planning, the above statement should not relieve the County from utilizing the now best available California Attorney General Best Practices for Analyzing and Mitigating Wildfire impacts of Development Projects when it comes to <u>evacuation planning</u> discussed below. This includes the prudent development of a variety of concentrated town center and mixed-use planning scenarios to help inform planners, the public and emergency responders regarding potential options during a wildfire evacuation including identification of significant impacts the amendments will have on wildfire evacuation.

7. The EIR failed to analyze and discuss the significant adverse evacuation impacts and emergency access from planned "road diet" lane reductions and the additionally planned single lane roundabout at the intersection at SR 267 and Hwy 28.

- 8. Section 3.1-32 of the Attached EIR EMERGENCY EVALUATION ANALYSES (Attachment C) stated a planning distance of approx. 15 miles from end to end however, mapping tools indicate the planning distance to be 19.5 miles leaving out 4.5 miles of significant planning area between the Stateline at North Shore and the Placer County line in Tahoma, CA. (Via SR 28 and Hwy 89). This additional 4.5 miles needs to be analyzed since it represents a key distance when it comes to accurately analyzing evacuation times.
- 9. The content of Placer County 2015 Eastside Emergency Preparedness and Evacuation Plan (EEPEP) Attachment
 A) does not provide the best available, best practice evacuation planning elements <u>based on current CA Atty</u> <u>General Best Practices</u>, and was apparently, except for a few geographical comment changes, cut and pasted from the 2008 version. This means that the bulk of the content of this document was created 9 years prior to the 2017 TBAP and 15 years prior to the currently planned TBAP addendum (Attachment B).
- 10. The 2015 EEPE states: The primary roads in the area, Interstate 80 (1-80) and State Highways 28, 8) and 267 comprise the major evacuation routes. Depending on the location and movement of the incident, the Unified Command designates which is or are to be used for evacuation and which for emergency vehicle ir gress and egress. When necessary, surface streets will also be designated for evacuees and for emergency vehicle traffic. A map of the major road networks is at Attachment A.

In this case, the EEPEP, EIR and EIR supplement fail to discuss, list, or clearly indicate the "surface streets" that may potentially be designated "for evacuees and for emergency vehicle ingress." These surface street designations should be identified in advance based on an "evaluation of the capacity of highway and street roadways to accommodate project and community evacuation and simultaneous emergency access." This, as suggested by the CA Attorney General Best Practices.

- 11 Beginning on page 3.1-32, of the Final 2017 EIR EMERGENCY EVACUATION ANALYSIS (Attachment C), the EIR fails to discuss the new, current, and significant best practice planning opportunity information as it relates to wildfire evacuation and fire resource access. Nor does this EIR, EIR Addendum or the EEPEP discus ; variety of reasonable scenarios, the absence of which removes the possibility to discuss life safety evacuation alternatives which may enhance informed planning decisions during a variety of evacuation scenarios. These is clude but are not limited to planning scenarios factoring in various wind speeds, day, or night occurrences, uphi I or downhill wildfire spread, and auto collisions impacting evacuation times.
- 12. Conclusions made in EIR Addendum 3.1-32 "assumes that manual traffic controls within the Plan area provide the necessary capacity to the egress points, and there are no accidents or other factors limiting apacity", under current conditions the area could be evacuated in 3.77 to 4.2 hrs.

Based on our emergency response experience we consider these assumptions to be <u>counter to re ility</u>, and misleading when it comes to providing accurate planning information to assist with resident and visitor life safety planning opportunities in connection with a wildfire evacuation and as related to discussions regarding fire evacuation impacts and emergency access.

This, since it is common knowledge that early "traffic surge", initial and ongoing panic, dense and debilitating smoke, nighttime impacts, loss of cell phone service, as well as downed electrified power lines, of which lines commonly result in power loss and also cause multiple other fires in the area, are common factor : in limiting traffic capacity to egress points. This includes downed energized and non-energized power lines t at are often observed strung across roadways in high wind conditions.

Body Cam Footage – Evacuation from Paradise https://abc7news.com/camp-fire-video-bodycam-of-evacuations/4850913/

All of these factors can cause immediate and long-term auto collisions, of which can cause injury and death within minutes and skew the projected evaluation times as discussed on Page 3.1-34 (Attachment C).

The EIR, EIR Addendum and the EEPEP fail to discuss common alternative scenario assumptions nore closely relating to the **reality** of emergency wildfire evacuations in wind and slope wildfire evacuations. These realities, demonstrated in the following links connected with the Paradise and Caldor wildfire evacuations. **NEXT**

CAPRDIO – July 11, 2019 – Camp Fire Evacuation Notifications – From the ignition source, approx. 7 miles from
Paradise, winds of 40 miles per hour shot embers along the ground and through canyon, and within 90 minutes,
the eastern side of Paradise began to burn, according to Butte County dispatch recordings, which CapRadio
reviewed to better understand how agencies responded that morning.

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https://www.capradio.org/articles/2019/07/11/emergency-alert-will-you-be-notified-if-a-wildfire-is-heading-toward-your-town/

 Caldor Fire Evacuation – Mercury News August 31, 2021 https://www.mercurynews.com/2021/08/30/its-out-of-control-caldor-fire-prompts-south-lake-tahoe-evacuation-traffic-gridlock/

SIGNITURE PAGES TO FOLLOW

Opposition to Placer County 2023 Tahoe Basin Area Plan (TBAP) and EIR Addendum Letter From Retired or Former Fire Department Professionals

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Signed: X **Printed Name:** X Dauchas Frank Lake Tahoe Community: X TAHOMA CA **Retired Fire Professional Title and Agency:** FOSTER CITY FIRE DEPT - FIREFIGHTER X Date: 9-14-23 Signed: X Printed Name: flut J Siegel Lake Tahoe Community: * TAHOMA , Ca Retired Fire Professional Title and Agency: Fire Fighter/Paramedic City of Mountain View Ca. Date: 9-14-23 Signed: Printed Name: Mames Scott Lake Tahoe Community: T-homa CA * Foster CHUy FIRE Dept - Battalion Chief **Retired Fire Professional Title and Agency:** Date: 9-14-23

Opposition to Placer County 2023 Tahoe Basin Area Plan (TBAP) and EIR Addendum Letter From Retired or Former Fire Department Professionals

Signed: X Larry Schluer_

Printed Name: X LARRY SCHLVER

Lake Tahoe Community: XMEEKS RAY

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Retired Fire Professional Title and Agency: x ENGINEER, SHERAMENTO FIRE DEFT.

Date: 9/20/23

Signed: Julie & Hotchinson

Printed Name:

Julie L. Hotchinson

Lake Tahoe Community:

X Jahoma

Retired Fire Professional Title and Agency: Battalion Chief - CAL FIRE X

Date:

October 4, 2023

x Dry they Printed Name: FLAHERTY

Lake Tahoe Community: x INCLINE VILLAGE, NV

Retired Fire Professional Title and Agency: X FIRE MARSHALL LITY OF SAN LUIS OBISPORA AND CITY OF DRANGE, CA BATTALION CHLEF, CITY OF ORANGE, CA Date: OCT, 8, 2023

Opposition to Placer County 2023 Tahoe Basin Area Plan (TBAP) and ElR Addendum Letter From Retired or Former Fire Department Professionals

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Signad:

X Jorold H. Cook Printed Name: X Jervold H. Cook

Lake Tahoe Community: X-Tahoe Pines

Retired Fire Professional Title and Agency: * Apparatus Operator/Sacramento Fire Dept.

Date: 10-8-23

Signed: X **Printed Name:** X Lake Tahoe Community: Х **Retired Fire Professional Title and Agency:** X Date: Signed: X **Printed Name:** X Lake Tahoe Community: X **Retired Fire Professional Title and Agency:** X Date:

[NOTICE: This message originated outside of Washoe County -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Hello Alexandra,

Attached are my ideas regarding evacuation planning for IV/CB. As they are long, I am sending this to you electronically so you can add them to the official minutes.

Roxanna Dunn

<!--[if !supportLists]-->A. <!--[endif]-->Plan development, metrics and data collection

- <!--[if !supportLists]-->1. <!--[endif]-->Include IV/CB representatives on plan review boards. Present segments of draft plan at CAB and Community Forum meetings.
- <!--[if !supportLists]-->2. <!--[endif]-->Develop population estimates and evacuation metrics for peak season (July-August) and shoulder season (September-November).
- <!--[if !supportLists]-->3. <!--[endif]-->Identify single road ingress/egress neighborhoods (Upper Tyner, Tyrolia Village, others?) and a) develop a plan for traffic controls of these areas, b) assess evacuation times and use such metrics to limit additional development of density-increasing units like multi-family, ADUs, STRs in these areas (see A.10 below)
- <!--[if !supportLists]-->4. <!--[endif]-->Test "blue book" assumptions about traffic load on 431 by measuring vehicle movement at 4:00 pm on a Saturday during ski season. Ditto, SR 28W through Kings Beach and SR 28E at Sand Harbor mid-day on July 4 weekend.
- <!--[if !supportLists]-->5. <!--[endif]-->Identify and develop capacity numbers for shelter-in-place centers (e.g., high school, Rec Center) with forest maintenance requirements and other safeguards specified for each. Factor in parking limits at these locations.
- <!--[if !supportLists]-->6. <!--[endif]-->Plan for buses/ferries to evacuate hotels and Sand Harbor.
- <!--[if !supportLists]-->7. <!--[endif]-->Support Tahoe Douglas Fire Department fund raising to provide two local helicopters for use in rescue and firefighting.
- <!--[if !supportLists]-->8. <!--[endif]-->Remove passive voice from the current plan and

avoid it in future write-ups. Replace text with tables, flow charts, and other graphic representations that can be readily referenced.

- <!--[if !supportLists]-->9. <!--[endif]-->Coordinate plans with Kings Beach.
- <!--[if !supportLists]-->10. <!--[endif]-->Develop a process to assess the evacuation impact of new development and include this as a required step in the permitting process.

<!--[if !supportLists]-->B. <!--[endif]-->Infrastructure and environment improvements

- <!--[if !supportLists]-->1. <!--[endif]-->Widen shoulders and add turn-outs on SE 28.
- <!--[if !supportLists]-->2. <!--[endif]-->Design and develop east shore bicycle path for use as an additional vehicle evacuation route. This would need to run all the way to Hwy 50.
- <!--[if !supportLists]-->3. <!--[endif]-->Establish a reservation system at Sand Harbor with a buffer number of reservations opened the week before reservation date only if fire danger is low. Collect visitor data during reservation to be used a) to issue warnings, and b) to locate the missing after a wildfire event.
- <!--[if !supportLists]-->4. <!--[endif]-->Run a communication drill without cell phones to simulate cell phone tower failure.
- <!--[if !supportLists]-->5. <!--[endif]-->Add provisions a) for managing trees that could fall across egress roads and b) for removing them if they fall during an evacuation.
- <!--[if !supportLists]-->6. <!--[endif]-->Consider using Mount Rose Ski area for emergency services such as shelter-in-place encampment, clinic for injured.
- <!--[if !supportLists]-->7. <!--[endif]-->Identify temporary storage areas (e.g., available school or arena parking lots in Reno and Carson) for second cars, boats, RVs, and trailers evacuated during Warning and Optional stages. Think about this one don't want to encourage people to move these vehicles once evacuation reaches Mandatory stage but do want to encourage early evacuation.
- <!--[if !supportLists]-->8. <!--[endif]-->Educate residents on the need for additional cell towers. Use towers that do not use the coating that can pollute the lake.

<!--[if !supportLists]-->C. <!--[endif]-->Process of evacuation

<!--[if !supportLists]-->1. <!--[endif]-->Identify and educate public on evacuation stages (e.g. warning, optional, mandatory) with assigned limits to each, e.g., in mandatory stage encourage one vehicle per household and do not allow boats or trailers on egress roads. Develop criteria for stages based on population and evacuation time estimates.

- <!--[if !supportLists]-->2. <!--[endif]-->Develop a neighborhood watch system for doorto-door warnings and evacuation of disabled and elderly people. (Note: The average age of victims in Paradise was 72 and 11 were disabled).
- <!--[if !supportLists]-->3. <!--[endif]-->Educate residents on purpose and use of Perimeter application with an annual drill for testing it and learning how to use it.