

## 5.12 WATER RECREATION AND SHOREZONE

This section discusses the regulatory guidance for water recreation and shorezone impacts and evaluates potential environmental effects related to those resources associated with implementation of the Beach Club on Lake Tahoe Project. Included in this analysis is a description of existing conditions, followed by a discussion of any changes in or to water recreation and/or shorezone uses in the project area. Planning guidelines established by Tahoe Regional Planning Agency (TRPA) provide the regulatory framework that allow for the assessment of potential environmental effects to these resources.

### 5.12.1 REGULATORY BACKGROUND

#### TAHOE REGIONAL PLANNING AGENCY

The provision of recreation facilities in the Lake Tahoe Basin is governed primarily by the TRPA, which provides basinwide planning and policy direction related to recreation. The Regional Plan, including the Goals and Policies, Code of Ordinances, and Thresholds, is described in Section 5.3, “Land Use.” The TRPA Draft 2006 Threshold Evaluation Report for recreation is described below.

TRPA has established environmental thresholds for nine indicators, including recreation. The threshold standards define levels of (environmental) quality desired for the region. Each indicator is assessed every 5 years to identify the progress made toward achieving threshold attainment. In April 2007 the 2006 Draft Threshold Evaluation Report was released for public and agency review. Impacts discussed in this section use the thresholds proposed in this document for determining significance. The same two recreation thresholds (i.e., indicators) analyzed in the 2001 Threshold Evaluation Report were analyzed in the 2006 evaluation. These thresholds correspond to the two policy statements in the Recreation Element of the Regional Plan:

- ▶ **Recreation Threshold Indicator 1 (R1) - Quality Experience and Additional Access.** It shall be the policy of the TRPA Governing Body in development of the Regional Plan to preserve and enhance the high-quality recreational experience including preservation of high-quality undeveloped shorezone and other natural areas. In developing the Regional Plan, the staff and Governing Body shall consider provisions for additional access, where lawful and feasible, to the shorezone and high-quality undeveloped areas for low density recreational uses.
- ▶ **Recreation Threshold Indicator 2 (R2) - Fair Share of Resource Capacity.** It shall be the policy of the TRPA Governing Body in development of the Regional Plan to establish and ensure a fair share of the total Basin capacity for outdoor recreation is available to the general public.

R1 consists of two parts: (1) preservation and enhancement of a high-quality recreation experience and (2) the provision of additional high-quality, undeveloped lands for recreation, including lake access. The attainment of this threshold standard is evaluated by considering the experience of recreation users and by considering public access to the lake and to other natural features. The Draft 2006 Threshold Evaluation Report considers the R1 indicator to be in attainment based on recreation surveys conducted by TRPA and recreation providers, by the quality of recreation facilities provided, and with consideration given to the increase in the amount of shoreline accessible to the public, as well as to an increase in other land and recreation opportunities – including additional bike trails that are accessible to the public in the basin. The 2006 Draft Threshold Evaluation Report cites an increase of almost 34.0 miles of publicly-owned shoreline since 1971, at a time when only 18% or 13.5 miles of the shoreline were publicly owned. This is a change in the attainment status determination from 2001 which considered the R1 indicator to be in nonattainment, a status given based on the subjective nature of the standard and that TRPA had not been able to successfully acquire the appropriate resources to conduct the required research and planning to accurately rate the status of R1 (TRPA 2002).

R2 is intended to ensure that a fair share of the region's outdoor recreation capacity is available to the general public. The attainment of this threshold standard is considered based on indicator units which are characterized by the cumulative accounts of Persons at One Time (PAOT) disposition (when applicable), the development of non PAOT projects, and land acquisition for recreation purposes. The 2006 Draft Threshold Evaluation Report found the R2 standard to be in attainment. The report states: "Most of the additional recreation capacity which has been added in the last 5 years is available to the general public." The report does raise some concern in relation to meeting the PAOT goals established by the 1986 Regional Plan, as well as concern that recreation facilities may become lost as private land owners convert existing recreation sites (e.g., campgrounds) to more lucrative venues (e.g., timeshares). The R2 threshold was also considered to be in attainment in 2001.

To provide background for the reader, the following paragraphs describe the PAOT allocation process.

As described in Chapter 33 of the TRPA Code of Ordinances, TRPA regulates the expansion of recreational use in the Lake Tahoe region by identifying targets for recreational use and regulating development to maintain them. It has identified targets for outdoor recreation measured in PAOT for overnight facilities, summer day-use facilities, and winter day-use facilities. TRPA regulates the rate and distribution of expanding recreational uses in the Lake Tahoe region through what is referred to as the allocation of PAOTs.

TRPA allocates PAOTs to plan area statements (PAS) and community plans and to a pool where PAOTs are held in reserve for overnight and summer day-use facilities. If a proposed expansion of recreational facilities meets TRPA's criteria, the project will be approved, and the number of PAOTs necessary to accommodate the increased level of activity associated with the project will be permitted to the project from the PAOTs allocated to the relevant plan area statement or community plan or reserve pool. Through this process, TRPA essentially grants permission for the project to increase use of the recreational facility by a particular number of people. PAOT disposition allows agencies to quantitatively measure recreation facility development and to determine how well the development of recreation facilities is keeping pace with other urban development pressures, such as residential and commercial development.

## **TRPA CODE OF ORDINANCES**

Section 7 of the TRPA Code of Ordinances establishes regulations for projects in the shorezone of Lake Tahoe. Chapter 50 sets forth findings that must be made by TRPA prior to approving a project in the shorezone or lakezone. Chapter 51 sets forth the allowable uses and accessory structures in the shorezone and lakezone. Chapter 52 regulates the maintenance, repair and modification of piers and other existing structures in the nearshore and foreshore. Chapter 53 sets forth development standards for the eight tolerance districts; standards for designating shorezone areas as visually modified, visually dominated, naturally dominated, and visually sensitive; design standards; and standards for other related matters. Chapter 54 regulates the placement of new piers, buoys and other structures in the nearshore and foreshore to avoid degradation of fish habitat, creation of navigation hazards, interference with littoral drift, interference with the attainment of scenic thresholds and other relevant concerns. Chapter 55 establishes regulations for construction activity within the backshore. Chapter 56 establishes mitigation fee requirements for various structures, such as new or expanded piers, in the shorezone.

The shorezone of the project site is located within Shorezone Tolerance District 7 (District 7). The project activities that occur within the shorezone would be required to adhere to the applicable requirements in the TRPA Code of Ordinances.

TRPA is proposing a comprehensive package of new Shorezone Ordinance amendments. A proposed program has been crafted that is subject to environmental review, and draft Code language has been prepared. The Final Environmental Impact Statement (FEIS) on the new amendments will be considered for certification and the Proposed Program considered for adoption by the TRPA Governing Board as early as spring 2008. The Beach Club project will be required to adhere to Shorezone Ordinances in place at the time of its approval.

## NEVADA DIVISION OF ENVIRONMENTAL PROTECTION

The Nevada Division of Environmental Protection (NDEP) has been working for more than three decades to improve water quality and develop water protection programs in the Tahoe Basin. In 2001, the State of Nevada, through the NDEP, joined forces with the State of California, through the Lahontan Regional Water Quality Control Board to address Lake Tahoe's declining water clarity. The division issues permits that limit the amount of pollutants which can be discharged to the air and water of the State. The division has a variety of permitting programs that deal with such discharges. Permit compliance is ensured through design reviews, inspections, review of monitoring reports and enforcement actions.

## NEVADA DIVISION OF WILDLIFE

Nevada Division of Wildlife (NDOW) is responsible for boating and safety on navigable waters. NDOW's navigational safety and recreational access program (e.g., angler access along shoreline) is designed to protect boaters from navigational obstacles and provide recreational access along the shoreline. The NDOW is a reviewing and commenting agency that supplies Nevada Division of State Lands with comments recommending approval or denial of shorezone projects within their jurisdiction. However, NDOW does not issue permits for shorezone construction and they issue citations for boating violations and can remove hazards to navigation within the waters of Lake Tahoe.

## NEVADA DIVISION OF STATE LANDS

The Nevada Division of State Lands (NDSL) leads the state's programs to protect Lake Tahoe. The Nevada Tahoe Resource Team is an interagency team coordinated by NDSL and dedicated to preserving and enhancing the natural environment in the Lake Tahoe basin. The team currently consists of eight members: five from NDSL; one from the Nevada Division of Forestry (NDF); one from the NDOW; and one from the Division of State Parks. The NDSL maintains the public trust on the Nevada side of Lake Tahoe for submerged land below 6223 feet Lake Tahoe Datum. The NDSL is a leasing agency that requires applications for structures lakeward of permanent high water, lake elevation 6229.1 feet. The NDSL is not required to make environmental quality findings for projects or lease agreements; the agency does, however, request comments from NDOW regarding any impacts to recreational access and fish habitat.

## DOUGLAS COUNTY MASTER PLAN

The *Draft 2006 Douglas County Master Plan* contains the following applicable recreation policies:

- ▶ **Policy 12.08.01** To protect the natural, cultural, and scenic qualities of Douglas County, including open spaces, public lands, agricultural lands, wetlands, and waterways that are critical to the quality of life in our community. The Department will continue to plan for the needs and preserve the rights of current and future residents, and especially their access to public parks and recreation opportunities, while ensuring high standards of safety and public welfare.
- ▶ **Policy 12.08.02** Continue to make available to county residents and visitors alike a variety of active and passive park facilities and recreation programs that satisfy their needs and enhance their basic quality of life.
- ▶ **Policy 10.08.03** Provide recreation opportunities that enhance the physical and mental well-being of the community.
- ▶ **Policy 12.08.11** Continue to acquire/develop facilities through joint ventures and agreements with other public and/or private entities including, but not limited to: Douglas County School

## **5.11.2 AFFECTED ENVIRONMENT**

### **RECREATION FACILITIES AND OPPORTUNITIES ON THE PROJECT SITE**

#### **Recreation**

The project site provides access to Nevada Beach and Lake Tahoe for residents of the existing mobile home park; no public recreational facilities are available. The project site includes approximately 217 feet of private beach frontage for the existing residents. There is also an existing 109-foot private recreational pier and three existing buoys at the project site. The pier is perpendicular to the shoreline and fixed in place.

#### **Shorezone**

The project site is located in District 7, which allows for water oriented recreation facilities such as beach recreation, buoys, piers, floating docks and platforms, water intake lines, and boat ramps in the backshore, nearshore, and foreshore. The backshore is defined as the area of instability and extends from the high-water level (elevation 6229.1) to stable uplands. The nearshore is defined as the zone extending from the low water elevation of Lake Tahoe (6223.0 feet Lake Tahoe Datum) to a lake bottom elevation of 6193 feet Lake Tahoe Datum, and the foreshore is defined as the zone of lake level fluctuation between the high and low water level. District 7 is relatively level shorezone underlain by morainic and alluvial materials with slopes of zero to nine percent (0-9%) (TRPA Code of Ordinances 51.2).

### **RECREATION FACILITIES AND OPPORTUNITIES IN THE PROJECT VICINITY**

#### **Recreation**

Generally, opportunities for recreation in the Lake Tahoe Basin are associated with the lake's open water (e.g., swimming, boating, personal watercraft use, fishing), shoreline (e.g. sunbathing, camping, bicycling, sightseeing, picnicking), or the terrain surrounding the lake (e.g., hiking, wilderness camping, mountain biking, skiing, snowboarding). Because of the project site's immediate proximity to Lake Tahoe, recreational facilities in the project vicinity primarily provide opportunities for water- and shoreline-based recreation. Nevada Beach Campground, which is located on National Forest lands north of the project site, provides swimming and fishing opportunities. However, this campground does not have a boat ramp. The campground is operated by a private concessionaire, California Land Management. The Nevada State 4-H Camp, which encompasses 33 acres, is located south of the project site. This camp includes a beachfront area and provides swimming, kayaking and canoeing opportunities for camp attendees. South of the 4-H Camp is the Edgewood Golf Course and the casino core of South Lake Tahoe.

#### **Shorezone**

Approximately 0.75 mile north of the project site, the shorezone classification changes from District 7 to Shorezone Tolerance District 2. District 2 generally has the same allowable uses and development standards as District 7. Approximately 0.4 mile south of the project site, the shorezone classification changes from District 7 to Shorezone Tolerance District 1. Allowable uses in District 1 are the generally the same as District 7; however, development standards for District 1 are more restrictive due to the fragile ecology.

## 5.11.3 ENVIRONMENTAL CONSEQUENCES AND RECOMMENDED MITIGATION MEASURES

### TRPA CRITERIA OF SIGNIFICANCE

Based on TRPA's Initial Environmental Checklist, the proposed project would result in a significant impact on water recreation or the shorezone if it would:

- ▶ be inconsistent with the TRPA environmental thresholds related to recreation in the Regional Plan;
- ▶ result in conflicts with regional PAOT objectives;
- ▶ result in conflicts between recreation uses, either existing or proposed; or
- ▶ result in a decrease or loss of public access to any lake, waterway, or public lands.

It should be noted that no PAOTs would be assigned by TRPA for the Beach Club Project because the proposed pier reconstruction and expansion and existing buoys would be private. Therefore, the proposed project would not have an effect on PAOTs, and this topic is not discussed further in this document.

### ALTERNATIVE A – PROPOSED PROJECT

**IMPACT**     **Impacts on Boating Activity.** *The proposed project would include expansion of the existing pier and retention and relocation of the three existing buoys for boat mooring. No additional mooring buoys would be added and boating activity in the area would remain approximately the same. Therefore, the proposed project would have a less-than-significant impact on boating activity.*

5.12.A-1

The proposed project would extend the existing 109-foot private pier 50 feet, for a total length of 159 feet from Lake Tahoe High Water Datum (elevation 6229.1). The reconstructed and expanded pier would follow the current alignment (perpendicular to the shoreline), and the existing fixed section of the pier would be removed and replaced with a 159-foot pier that would include an 80-foot vertically moving fixed pier section, a 20-foot transition section that connects the fixed section to a 59-foot floating pier section (Exhibit 3-10). A 10-foot approach walk would also be constructed on the shoreline to provide stable access from the beach shore to the pier. The floating section of the pier would be constructed in an "L" shape and would include two 10-foot by 20-foot platforms extending to the north intended to provide safer and more stable boat loading and unloading (see pier description in Chapter 3, "Project Description"). At its widest point, the floating pier would be 30 feet wide. The expanded pier would be a private pier with a ramp capable of adapting to boat entry levels.

The three existing buoys would be retained for boat mooring and would be relocated parallel to and north of the reconstructed pier (Exhibit 3-10). This relocation would remove the buoys from the scenic recreational viewshed from Nevada Beach. Motorized boat access would be provided between the pier and the relocated buoys. Expansion of the pier (limited to 50 feet) is not expected to cause an increase in boating access to the project site, and no additional mooring buoys, boat launching facilities, permanent moorings, or marina facilities would be constructed. Because no additional boating facilities would be added, it is expected that boat activity levels in the project area would remain approximately the same. The proposed project would have a **less-than-significant** impact on boating activity levels. For a discussion of water quality impacts related to boat usage, see Section 5.5, "Hydrology and Water Quality."

### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.A-2** **Impacts on Shoreline Access.** *The proposed project would not change the level of public access to the shoreline. There would be no access improvements as part of the project and the extension of the pier is not expected to change boating activity in the project area. Therefore, there would be **no impact** to shoreline access.*

The proposed project would not change the level of shoreline access because there would be no access improvements as part of the project. Under Alternative A, the shoreline would continue to be accessible to residents of the project site and beach and swim club members and their guests.

A swimming area would be roped off along the shore in the project area to protect swimmers from adjacent boating activities. However, no public facilities (e.g., restrooms, parking) would be constructed on the project site. Because the proposed project would not change shoreline access in the project area, there would be **no impact** on shoreline access.

### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.A-3** **Impacts on Fishing Activities.** *Construction of the extended pier would result in temporary, localized substrate and water column disturbance, but would not impair or reduce fish habitat or otherwise impair recreational fishing activities. The project is not expected to cause an increase in boat activity levels. No new mooring buoys or boating facilities would be provided. Because boat activity levels are not expected to noticeably increase, there would be little change to the opportunities and/or quality of fishing in the project area. Therefore, the proposed project would have a **less-than-significant** impact on fishing activities.*

As addressed in Impacts 5.5.A-5, 5.5.A-6, and Impacts 5.9.A-11 through 5.9.A-15, the reconstruction and extension of the existing pier and relocation of the three existing buoys would not be a significant direct source of water pollution and would not result in significant impacts to fisheries habitat. The proposed facilities would not be composed of biostimulatory materials (nutrient causing excessive growths of aquatic plants), and they would be installed without significant disturbance to the lake bottom. The primary activities in the Shorezone that contribute significantly to water quality degradation are dredging, boating activities (including marina operations), and backshore development. Alternative A does not include dredging, marina operations, or backshore development. As described in Impact 5.5.A-5, construction staging for the pier and relocated buoys would be provided by a barge on the lake. In addition, a turbidity curtain would be used at all times during construction of the floating pier and relocation of the three buoys, which would prevent fine and coarse suspended sediment transport away from areas of water-based construction activities, in this case the driving of the pier piles. Therefore, construction of the extended pier and buoy relocation would not result in the degradation of water quality or fisheries habitat.

The boating activity levels are expected to be similar to existing levels because the project would not provide new mooring buoys nor any public parking, boat launch, or marina facilities. Because there would be no substantial change in boating activity, the project would not significantly reduce the opportunities for and/or quality of fishing in the project area.

The area surrounding both the existing pier and the proposed pier expansion and relocated buoys, are not located in prime fish habitat. The nearest fishing hole is Hobart's Hole, which is located approximately 800 feet from the high water datum. Because the expanded pier would be extended to 159 feet from the high water datum, it would not affect the aquatic habitat that supports the localized recreational fishery or otherwise interfere with the fishing experience at Hobart's Hole. Furthermore, because boating activity is not anticipated to increase substantially, fishing pressure would not increase significantly and the quality of fishing activities at this location would not be impaired. Because the proposed project would have a minimal effect on fishing opportunities, this impact would be **less than significant**.

## Mitigation Measures

No mitigation is required.

**IMPACT 5.12.A-4** **Impacts on Recreational Facilities.** *Construction of the proposed project would include improvements to existing on-site recreational facilities and would construct new facilities on the project site. The project would not have any direct impacts on recreational facilities outside the project area and the population at the project site would be roughly equivalent to the existing population, so demand for other local recreational facilities would be approximately the same. This impact is considered **less than significant**.*

Construction of the proposed project would include expansion of the existing private pier, relocation of three boat mooring buoys, and a roped-off swimming area. The project would also include construction of a beach and swim club with two swimming pools, men's and women's locker rooms, a restaurant, and an assembly room. Construction of these project elements would improve the existing recreational facilities on the project site. These facilities would be private, available only to residents and members of the beach and swim club and their guests. No new public recreational facilities would be constructed or expanded as part of the project, and the project would not have any direct impacts on recreational facilities outside of the project site. Increased recreational opportunities on the project site may indirectly reduce usage of other nearby recreational facilities. In addition, because the population on the project site would remain approximately the same, there would be no increased demand for recreational facilities in the project vicinity. Therefore, this impact is considered **less than significant**.

## Mitigation Measures

No mitigation is required.

## ALTERNATIVE B – TWO-LOT ALTERNATIVE, SINGLE-FAMILY ESTATES

**IMPACT 5.12.B-1** **Impacts on Boating Activity.** *Because implementation of Alternative B would include a similar expansion of the existing pier (minus the vertically moving fixed section and the "L" shaped end of the floating section) and the same retention and relocation of the three existing buoys for boat mooring as with Alternative A, this impact would be similar to Impact 5.12.A-1. No additional mooring buoys would be added. There would be fewer residents on the project site under this alternative; therefore, boating activity levels in the project area may decrease compared to existing conditions. However, because the reduction in boating activity would be limited to residents, and there is currently no public access to boating facilities at the project site, this impact would be **less than significant**.*

Under Alternative B, the project site would be developed as two single-family estates on the two realigned parcels. Both estates would share access to the beach and the pier, which would remain private and be extended 50 feet, for a total length of 159 feet. The Alternative B pier would differ from Alternative A in that it would remove and replace the existing fixed section of the pier with a 159-foot pier that would include an 80-foot fixed pier and a 34-foot ramp that would connect the fixed pier to a 45-foot floating pier (Exhibit 4-2). A 10-foot approach walk would also be constructed on the shoreline to provide stable access from the beach shore to the pier. The pier width would be limited to 10 feet and would not include the "L" shaped end section nor would it include the vertically moving fixed section included in Alternative A. The three existing buoys would be retained for boat mooring and would be relocated parallel to and north of the reconstructed pier as with Alternative A.

Expansion of the pier (limited to 50 feet) is not expected to cause an increase in boating access to the project site, and no additional mooring buoys, boat launching facilities, permanent moorings, or marina facilities would be constructed. Because no additional boating facilities would be added, and because fewer residents would have access to the existing facilities, Alternative B would likely cause a decrease in boating activity levels in the

project area. However, because this reduction in boating activity would only affect residents of the site, and the project site does not currently provide public access for boating, this impact would be **less than significant**.

#### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.B-2** **Impacts on Shoreline Access.** *Under Alternative B, access to the shoreline in the project area would not be improved. There is currently no public access to the project site and none would be provided under this alternative. Although access to the shoreline would not change, the reduction in the number of residents in Alternative B would potentially reduce the number of visitors to the shoreline. This impact would be less than significant.*

Under Alternative B, the project site would remain private and the existing pier would be reconstructed and extended similar to Alternative A (minus the vertically moving fixed section and the “L” shaped end of the floating section). Therefore, shoreline access would not be improved under this alternative compared to existing conditions. Because the project site would be developed with two single-family estates, the number of residents that would have access to the shoreline would decrease compared to existing conditions. There is currently no formal public access to the shoreline project area; however, the public may use the shoreline in the project area informally. Implementation of Alternative B would not change public access to the shoreline in the project area; therefore, this impact is considered **less than significant**.

#### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.B-3** **Impacts on Fishing Activities.** *Because implementation of Alternative B would include a similar expansion of the existing pier (minus the vertically moving fixed section and the “L” shaped end of the floating section) and the same retention and relocation of the three existing buoys for boat mooring as with Alternative A, this impact would be similar to Impact 5.12.A-3. Construction of the extended pier would result in temporary, localized substrate and water column disturbance, but would not impair or reduce fish habitat or otherwise impair recreational fishing activities. Alternative B is not expected to cause an increase in boat activity levels. No new mooring buoys or boating facilities would be provided. Fishing activities in the area may decrease with the decrease in number of residents. Because the reduction in fishing activity would only affect residents of the site, this impact would be less than significant.*

This impact would be similar to Impact 5.12.A-3 above in that the construction of the extended pier and buoy relocation would not result in the degradation of water quality or fisheries habitat nor would it reduce the opportunities for and/or quality of fishing the project area.

Because the project site would be developed with two single-family estates under this alternative, the number of residents that would have access to the fishing in the project area would decrease compared to existing conditions. There is currently no formal public access to the project area for fishing; however, the public may use the project area informally for fishing. Implementation of Alternative B would not change public access for fishing in the project area, and any reduction in fishing opportunities for residents would be **less than significant**.

#### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.B-4** **Impacts on Recreational Facilities.** *Under Alternative B, there would be no recreational facility improvements in the project area. Therefore, recreational facilities adjacent to the project site and in the surrounding area would remain unchanged. Alternative B would have **no impact** on recreational facilities.*

Under Alternative B, the existing pier would be extended and the existing buoys would be relocated similar to Alternative A (minus the vertically moving fixed section and the “L” shaped end of the floating section). There would be no changes to recreational facilities in the surrounding area under this alternative. In addition the population on the project site would decrease and may reduce the usage of recreational facilities in the project vicinity. Because there would be no changes to recreational facilities adjacent to the project site or in the surrounding area, and usage of recreational facilities by residents would decrease, this alternative would have **no impact** on recreational facilities.

#### Mitigation Measures

No mitigation is required.

### **ALTERNATIVE C – TWO-LOT ALTERNATIVE, MULTIFAMILY RESIDENTIAL**

**IMPACT 5.12.C-1** **Impacts on Boating Activity.** *Because Alternative C would include the same facility improvements as Alternative A, this impact is the same as Impact 5.12.A-1 described above for Alternative A. Alternative C would include expansion of the existing pier and retention and relocation of the three existing buoys for boat mooring. No additional mooring buoys would be added and boating activity in the area would remain approximately the same. Therefore, Alternative C would have a **less-than-significant** impact on boating activity.*

#### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.C-2** **Impacts on Shoreline Access.** *Because Alternative C would include the same changes to the pier and buoys as Alternative A, this impact is the same as Impact 5.12.A-2 described above for Alternative A. Alternative C would expand the existing private pier and would relocate the existing buoys for boat mooring. Therefore, there would be **no impact** on shoreline access.*

#### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.C-3** **Impacts on Fishing Activities.** *Because Alternative C would include the same pier changes as Alternative A, this impact is the same as Impact 5.12.A-3 described above for Alternative A. Construction of the extended pier would result in temporary, localized substrate and water column disturbance, but would not impair or reduce fish habitat or otherwise impair recreational fishing activities. Alternative C is not expected to cause an increase in boat activity levels. No new mooring buoys or boating facilities would be provided. Because boat activity levels are not expected to noticeably increase, there would be little change to the opportunities and/or quality of fishing in the project area. Therefore, Alternative C would have a **less-than-significant** impact on fishing activities.*

#### Mitigation Measures

No mitigation is required.

**IMPACT 5.12.C-4** **Impacts on Recreational Facilities.** *While Alternative C would include the same pier changes as Alternative A, there would be little change to recreational facilities for Alternative C. In addition, Alternative C would not have any direct impacts on recreational facilities outside the project area. Construction of Alternative C may slightly reduce usage of nearby recreational facilities. Alternative C would have **no impact** on recreational facilities.*

#### Mitigation Measures

No mitigation is required.

#### **ALTERNATIVE D – NO PROJECT – JERE WILLIAMS PLAN**

Under Alternative D, the existing mobile home park would remain on the project site and would continue to operate and site improvements would be made over time per the Jere Williams Plan. The existing 109-foot private pier would remain with no renovation or expansion, and no buoys would be relocated nor would a swimming area be installed. This alternative would not increase boating or shoreline access in the project area. Under Alternative D, fishing levels and recreational facilities adjacent to the project site and in the surrounding area would remain unchanged compared to existing conditions. Therefore, implementation of Alternative D would have **no impact** on water recreation or the shorezone in the project area.

#### **ALTERNATIVE E – NO PROJECT – MANUFACTURED HOUSING**

Under Alternative E, the existing mobile home park would remain on the project site; however, the mobile home park would be closed for a period to allow for all site improvements to be implemented at one time. After the improvements the mobile home park would be reestablished with manufactured housing units. The existing 109-foot private pier would remain with no renovation or expansion, and no buoys would be relocated nor would a swimming area be installed under this alternative. This alternative would not increase boating or shoreline access in the project area. Under Alternative E, there would be a temporary reduction in all water recreation activities at the project site while the mobile home park is closed. However, this reduction in water recreation would be temporary and would not have a substantial effect on water recreation in the project area. Implementation of Alternative E would have a **less-than-significant** impact on water recreation and the shorezone in the project area.