

Chapter 1. Proposed Action

1.1 Introduction

The Kings Beach Commercial Core Improvement Project (proposed action) is located in the community of Kings Beach, which is situated along the north shore of Lake Tahoe in Placer County, California. The action area is bounded by Chipmunk Street on the east and State Route (SR) 267 on the west, while the northern boundary is located along the edge running diagonally west to east from Rainbow Avenue to Minnow Avenue and the southern boundary is located along the shoreline of Lake Tahoe, south of SR 28.

Specifically, the proposed action is located in portions of the Northeast $\frac{1}{4}$ of Section 13, Township 16 North, Range 17 East, Mount Diablo Baseline and Meridian (MDB&M), and the West $\frac{1}{2}$ of Section 19, Township 16 North, Range 18 East, MDB&M (Figure 1-1). The action area contains both residential and commercial properties and receives high vehicular and pedestrian traffic year-round.

As currently proposed, elements of the proposed action include roadway improvements to SR 28 to accommodate anticipated future transit and pedestrian needs; the installation of sidewalks, curbs, gutters, and storm drain facilities at specific locations; drainage ditch lining and revegetation at specific locations; streetscaping; the designation of specific road sites as on-street parking; and the construction of new, off-street parking lots at specific locations within the action area. The project is included in the 2004–2027 Lake Tahoe Basin Regional Transportation Plan and the 2004 Federal Transportation Improvement Program. There are currently four alternatives being considered for the improvements to SR 28.

This joint environmental document has been prepared to analyze impacts associated with the proposed action in Kings Beach. The document was prepared for the Tahoe Regional Planning Agency (TRPA) to comply with standards contained in the Tahoe Regional Plan, for Placer County and the California Department of Transportation (Caltrans) to comply with standards contained in the California Environmental Quality Act (CEQA),

and for the Federal Highway Administration (FHWA) to comply with standards contained in the National Environmental Policy Act (NEPA).

TRPA is the lead agency responsible for certification of the document pursuant to its regional plan, while Placer County is the lead agency responsible for certification of the document pursuant to CEQA. The FHWA will review the document to ensure NEPA requirements are met in regards to the proposed improvements (four alternatives) to SR 28. Caltrans is working as FHWA's agent for reviewing the document for adequacy in terms of the proposed improvements to SR 28 under both CEQA and NEPA.

1.2 Background

Historically, Kings Beach has been one of the primary commercial and recreational centers in the Lake Tahoe Basin (Basin). SR 28 extends through the Kings Beach commercial area, which is generally defined as extending from the SR 267 intersection at the western boundary to the intersection of SR 28 and Chipmunk Street at the eastern boundary. Land uses are predominantly tourist/recreational and commercial.

Over the years, land use development in Kings Beach has been influenced by the nature of its original subdivision. The 1926 "Brockway Vista" subdivision map laid out rectangular lots in a typical grid system. Many of the lots are small, measuring 7.6 meters (24.934 feet) in width and 38.1 meters (125.0 feet) in depth. This layout has resulted in a large number of small structures confined by parcel width.

Originally constructed as a two-lane Forest Reserve road in the early 1930s, SR 28 cuts somewhat diagonally through the subdivision. Parcels in blocks adjacent to the highway are located perpendicular to the road and slightly askew from parcels and blocks in the remainder of the community. The limited width of the roadway allowed for roadside parking and an adequate setback between the roadway and adjacent buildings. During the 1960s, the roadway was expanded to four lanes through the Kings Beach Commercial Core (KBCC) area. The additional lanes were provided at the expense of the setback between buildings and the road. Roadside parking was also affected. During peak

summer periods, there is a shortage of available parking in portions of the KBCC area. In addition, pedestrian crossing of the highway was made more difficult due to the roadway widening.

Placer County and the TRPA adopted the Kings Beach Community Plan (KBCP) in 1996. The plan presents a vision intended to guide community enhancement activities. Major components of the improved pedestrian and bicyclist facilities, the installation of streetscape improvements, and the KBCP are directed at the KBCC. These include reconstructing SR 28 and providing water quality improvements.

The intent of the proposed action is to address bicycle and pedestrian circulation, parking needs, long-term traffic flow along SR 28, preservation of scenery, and water quality needs within the KBCC area in a manner consistent with the KBCP.

1.3 Environmental Setting

The proposed action is located on SR 28 within the Basin, an intermountain basin formed by the faulting of the rocks of the Sierra Nevada to the west and the Carson Range on the east. Lake Tahoe occupies a down-dropped block, or graben, that is bordered by steeply dipping faults.

SR 28 is the only north shore thoroughfare that runs the course of the north part of the Basin. The highway through Kings Beach includes four travel lanes, a number of driveways, and minor local road intersections with and without left-turn pockets.

The principal natural drainage that occurs within the action area is Griff Creek; several intermittent unnamed stream courses also occur. The dominant plant community in the general action area consists of upper montane coniferous forest with scattered stream environment zones (SEZ).

1.4 Purpose and Need

The purpose of and need for this proposed action are discussed below. Under NEPA, the “purpose of” and “need for” a proposed action are closely linked, but subtly different. Need may be thought of as a specific problem, and the purpose as an intention to solve the problem.

1.4.1 Purpose

The purpose of the proposed action is to improve pedestrian and bicycle mobility and safety, improve water quality, and improve aesthetics of the commercial core through Kings Beach. Specifically, Placer County, in coordination with the TRPA, Caltrans, and FHWA, proposes to make the following improvements on and adjacent to SR 28 within the Kings Beach community.

1.4.1.1 Pedestrian and Bicycle Mobility

Dedicated bike lanes, sidewalks, and enhanced and clearly marked pedestrian crossings would be constructed as part of the proposed action. Through the establishment of these dedicated bike lanes, sidewalks, and enhanced and clearly marked pedestrian crossings, as well as the installation of controlled intersections, the need to improve pedestrian and bicycle mobility and safety within the KBCC would be met.

1.4.1.2 Water Quality

Improve water quality through the construction of new collection and conveyance infrastructure (including new roadway curbs and gutters, storm drains, ditches, man-made channels, collection/detention basins, and other conveyance infrastructure) leading to water treatment facilities, including those identified in the Kings Beach Watershed Improvement Project. The capacity of upstream facilities would be enlarged to allow for the collection and conveyance of both upstream flows and stormwater flows generated by the roadway itself. Facilities will be designed and constructed that they can accommodate stormwater generated in the area, as well as stormwater conveyed into the

area from upstream. Finally, erosion control measures to protect water quality will be incorporated as part of the proposed action.

1.4.1.3 Scenic and Aesthetic Character of the King Beach Community Core

The scenic and aesthetic enhancements would include a strong emphasis on attaining scenic requirements and providing a more attractive pedestrian environment. This would result in improved business revenues and a greater willingness on the part of business and private property owners to invest in building renovations and other additional community improvements. Scenic and aesthetic improvements that would enhance the scenic integrity of the KBCC would include entry statements at the east and west ends of the KBCC; the installation of streetlights, benches, transit facilities, planters, bicycle racks, trash receptacles, organized parking, and additional landscaping.

1.4.1.4 Implementing Tahoe Regional Planning Agency Environmental Improvement Plan and Community Involvement Plan Projects

Currently the KBCC fails to meet traffic, water quality, and scenic thresholds established by agencies with jurisdiction in the action area. Implementing TRPA Environmental Improvement Plan (EIP) projects would help contribute towards achieving planning goals at the community and regional levels.

1.4.2 Need

1.4.2.1 Pedestrian and Bicycle Mobility

Tourists come to Kings Beach to enjoy the area's aesthetic and recreational resources and facilities. At times, the local population swells by as much as 5.5% (Claggett Wolfe Associates 2002) over full-time residents. Convenient pedestrian access is a critical component of commercial and recreational activities in Kings Beach. Currently, sidewalks are present in only some locations. Where sidewalks are not present, pedestrians must walk along the edge of the street or along undeveloped portions of the right-of-way (ROW). Pedestrian and bicycle mobility is currently limited along SR 28

because pedestrians and bicyclists have to compete with vehicles on SR 28 for travel space and/or share unimproved shoulder areas within the KBCC. In addition, there are currently only two signalized (i.e., controlled) intersections within the KBCC, which help facilitate and enhance pedestrian access across SR 28. Because of mobility and safety issues, improved pedestrian access is needed. This includes access along the KBCC, between parking and the KBCC, and between the KBCC and adjacent recreation areas.

Bicycle use is increasing in Kings Beach, as well as in the general Lake Tahoe area, as a result of improvements to bicycle access on the south and west shores. It is reasonable to assume that levels of bicycle use will continue to increase with time. Bicycle facilities are currently not present within the KBCC. Bicyclists are forced to ride in the roadway, competing with automobiles and pedestrians. As a result of these incompatibilities, there is a need to improve bicyclist access along the KBCC. Meeting this need will require that sufficient space be identified and set aside for use by pedestrians and bicyclists. This will include on-highway bike lanes, multiuse sidewalks, curbs, or other barriers intended to protect pedestrians and bike lanes.

Enhancing and facilitating pedestrian access across SR 28 is equally important. Currently, two signalized intersections are present at Coon Street and SR 267; each has pedestrian activated signals. Four striped crosswalks are present at various locations along SR 28 within Kings Beach (SR 267, Bear Street, Coon Street and Fox Street). However, crosswalk markings are visible only between June and November because striping is obliterated by snow removal equipment during the winter months. Even where available and visible, these crossings offer the pedestrian only limited protection when trying to cross the roadway, as some crosswalks lack signals.

The Caltrans *District 3 Traffic Concept Report for SR 28* (California Department of Transportation 1997a) identifies Level-of-Service (LOS) F as the concept objective for Kings Beach in 2016, with no projects proposed to increase capacity. When the concept report was completed in 1997, the LOS for Kings Beach was B. Conflicts between vehicles and pedestrians were cited as a major factor in the degradation of LOS.

Caltrans conducted a warrant analysis on five intersections throughout the action area (Secline, Deer, Fox, Bear, Chipmunk Streets). This study was based on 1999 traffic counts and concluded that only Bear and Coon Streets met signal warrants. The Bear Street intersection meets signal warrants based on interruption of continuous service, pedestrian traffic, 4-hour volume, and peak-hour volume. Of the eight adopted traffic signal warrants, the Fox intersection was found in the 1999 study to meet two warrants: Warrant 1 (the eight-hour volume warrant based upon interruption of traffic on SR 28) and Warrant 2 (Peak-hour warrant). An updated warrant analysis conducted for this environmental analysis has indicated that a signal at Fox Street and Deer Street may be warranted for future years. However, the determination of traffic control devices at these intersections will be considered as a separate roadway improvement project.

Accident data for the period between April 1, 1996, and December 31, 2004, indicate that the rate of injury accidents, the rate of total accidents, and the overall accident rate within the action area are higher than the state average for other similar facilities. Intersections at Secline, Deer, Chipmunk, and Fox Streets have accident rates higher than the average for similar facilities. Accident levels along the action corridor (SR 28) and at corridor intersections within the action area can be expected to increase as traffic, pedestrian, and bicyclist volumes increase.

1.4.2.2 Water Quality

Primary responsibility for the protection of water quality in the action area rests with the California Regional Water Quality Control Board, Lahontan Region (LRWQCB) and the TRPA. The primary controlling documents include Lahontan's *Water Quality Standards and Control Measures for the Lake Tahoe Basin* (Basin Plan) and TRPA's *Goals and Policies, Environmental Thresholds*, and 208 Plan. These documents outline water quality standards for surface- and groundwaters, the beneficial uses of waters and objectives that must be maintained or attained to protect those uses, and other environmental standards that must be achieved and maintained in the Basin. Currently, portions of the Kings Beach action area do not meet the objectives—including treatment

requirements, effluent limits for specified pollutants, and other water quality standards—set by these agencies, which contributes to the pollution of Lake Tahoe and results in greater effects on the greater physical environment of the Basin.

The water quality goals and objectives set by LRWQCB and TRPA are implemented through National Pollution Discharge Elimination System (NPDES) and other project permits and implementation of TRPA’s regional plan. The proposed action lies within the jurisdiction of Placer County’s permit requirements. Additionally, properties lying within the Caltrans ROW are governed by the State Water Resources Control Board (State Water Board) and must meet the requirements of NPDES permit No. 99-06-DWQ. Water Quality objectives and goals are enforceable through effluent limitations, and these must be met to the Maximum Extent Practicable (MEP) for the MS4 requirements and Best Available Technology Economically Achievable/Best Conventional Technology (BAT/BCT) for the construction requirements.

Because most development in the Kings Beach community occurred during the 1920s and 1930s and the late 1940s and 1950s, drainage issues were not addressed from an areawide perspective, and water quality treatment was seldom integrated into local systems. Over the last 20 years, several erosion control projects have been constructed up-gradient (north) of SR 28. At this time, culverts underneath SR 28 do not meet applicable Caltrans and Placer County design standards because they are too small to convey the required design flows; there have been occasions when stormwater sheet flows crossed SR 28, and there have been occasions when localized flooding occurred below SR 28. In addition, very few stormwater treatment facilities are present downstream (south) of SR 28. New facilities are necessary to accommodate and treat stormwater generated in the action corridor, as well as stormwater conveyed into the area from up-gradient. Although the proposed action’s purpose and need will not address the issue of improperly sized culverts, the project will not worsen this issue.

Portions of the existing drainage system constructed in the 1960s are undersized and do not provide water quality treatment. Recent upgrades north of SR 28 have increased

drainage network capacity and improved sediment control. However, the restricted capacity of culverts underneath the roadway limits the extent to which up-gradient waters can be conveyed through the ROW. Also, proximity to Lake Tahoe limits options available for the treatment of stormwater runoff. Because of these limitations, existing areawide stormwater treatment facilities do not meet standards set by local regulatory agencies.

Meeting this need to the maximum extent practicable will involve the consideration of four major factors. First, limited space is available to accommodate treatment facilities that could address areawide stormwater flows. As a result, emphasis needs to be placed on source control and reducing the quantity of runoff reaching stormwater conveyances. Second, stormwater collection facilities will be needed along SR 28, along side streets, and in parking areas. Third, new conveyance facilities would need to be sized to accommodate agreed upon design flows. Of particular concern will be conveyances that extend under SR 28. It should be noted, as previously discussed, the proposed action's purpose and need will not address the issue of improperly sized culverts at the Griff Creek crossing. While overtopping and flooding currently occur sporadically at this location, the proposed action will not change or worsen this condition. However, all culverts, crossings, and drainage facilities affected by the proposed action will be upgraded as part of the proposed action, which will serve to improve flows at these locations and would help to improve runoff and water quality in the action area. Finally, treatment will be required for the collected and conveyed stormwater. Stormwater treatment facilities should be sized to the maximum extent practicable to accommodate design storm treatment volumes as specified in the respective Placer County and Caltrans NPDES permits. Stormwater treatment should focus on removal of fine sediment, nitrogen, and phosphorus to meet surface water discharge standards.

1.4.2.3 Scenic and Aesthetic Character of the King Beach Community Core

Historically, Kings Beach has been one of the primary commercial and recreational centers in the Basin. However, because most of the business infrastructure (motels, businesses, rentals) developed in the 1950s remains unchanged and continues to decline, the area has suffered with respect to scenic quality and aesthetics. The KBCC area is located within TRPA's Scenic Roadway Unit 20. Unit 20 has been defined by the TRPA as being below the scenic threshold value, and therefore Out-Of-Attainment with the Basin's Scenic Threshold. For this reason, this area has been targeted for scenic restoration under the TRPA EIP.

In addition, because of the declining infrastructure, the community has not captured a share of the wealthier clientele who patronize the more updated facilities in neighboring communities. This has resulted in a decline in business revenue and ultimately has had an impact on the community, which has been documented in a strategic business development plan for the area that was prepared by Placer County. This plan documents a steady decline in recreation-related business indicators over the last decade.

For this reason, it is vital that the KBCC be rehabilitated and revitalized to ensure the long-term success of the community. Providing an enhanced sense of community ("main street") can increase the community's ability to accommodate commercial and recreational activity by visitors to the area. This enhancement should include a strong emphasis on attaining scenic requirements and providing a more attractive pedestrian environment. This will result in improved business revenues and a greater willingness on the part of business and private property owners to invest in building renovations and other additional community improvements.

Aesthetic improvements should be included that enhance the scenic integrity of the KBCC. These may include entry statements at the east and west ends of the KBCC; the installation of streetlights, benches, transit facilities, bicycle racks, trash receptacles, organized parking, and planters intended to separate pedestrians from the roadway; and

additional landscaping. The goal of these activities would be to improve the aesthetic character of the commercial core and to approach scenic quality ratings within the action area as measured by TRPA.

1.4.2.4 Implementing Tahoe Regional Planning Agency Environmental Improvement Plan Projects

By meeting the needs (*Section 1.4*) and the performance objectives (*Section 1.5*), some of the projects listed in the EIP can be fully or partially implemented. By doing so, the proposed action will make a substantial contribution toward achieving planning goals at the community and regional level within the areas listed below in Table 1-1.

Table 1-1. Tahoe Regional Planning Agency Environmental Improvement Plan Projects

EIP Number	Project Category	Project Title/Description
787	Air Quality/Traffic	Kings Beach Roadwork—Curb and Gutter
10060	Water Quality	Kings Beach Commercial Area

Notes:

- * The area of implementation for this EIP project extends through, but is not limited, to the Kings Beach Commercial Core Area.
- ** The area of implementation for this EIP project is watershed-wide. Although some improvements associated with this EIP project may be located in the Kings Beach Commercial Core Area, they need not be.

1.5 Performance Objectives/Existing Conditions That Need To Be Maintained

Placer County has identified the following five objectives that need to be recognized and met throughout the planning process.

1. **Minimize adverse effects to private property.** The construction of elements identified as necessary to meeting the proposed action’s needs may require intrusions onto private property. To the extent practicable, such intrusions should be limited.

2. **To the extent practicable, minimize the loss of parking along SR 28 due to the proposed action.** The change in parking availability due to various potential project activities (roadway, water quality, and pedestrian and bicycle access improvements) would vary depending on the proposed action's final configuration. Factors most likely to affect parking include the number and nature of intersections slated for improvement, the width of roadside amenities (sidewalks and landscaping), and the availability of alternate or shared parking facilities.
3. **Improve public safety.** Providing improved pedestrian and bicyclist facilities, parking facilities, and improved intersections will improve public safety substantially. During project design, attention will be directed toward the identification of other measures that might improve public safety even further. To the extent practicable, such measures will be integrated into the project design.
4. **Consider postconstruction operation and maintenance costs associated with water quality improvements.** Once constructed, many water quality improvements will require routine operational expenses and regular maintenance. The project design will attempt to achieve a reasoned blend between functionality and maintainability.
5. **Maintain circulation patterns.** As noted above, SR 28 is a component of the California state highway system, so the project design must maintain an appropriate and adequate circulation pattern on the state highway. The proposed action will need to be designed and implemented in such a manner that traffic circulation is addressed.

1.6 Required Permits and Approvals

1.6.1 Placer County under the California Environmental Quality Act

Discretionary actions required by Placer County as the lead agency under CEQA for project implementation consists of the following:

- Certification of the environmental impact report (EIR),

- Approval of the proposed improvements (the preferred alternative or one of the other alternatives),
- Approval of the engineering designs and advertisement of construction bids for the approved project,
- The County will enter into a Cooperative Agreement with Caltrans for the project. The County will acquire necessary ROW approval for acquisitions for the approved project of parking sites and sidewalks, and will obtain the services of a qualified ROW consultant to perform ROW services subject to the review and approval of Caltrans,
- Approval to award the construction contract for the approved project, and
- Amendment of the Transportation Element of the KBCP for Alternatives 2 or 4, if adopted, to call for a reduction to three travel lanes on SR 28.
- Appraisal of land and approval to make offer to acquire property rights (easements, etc.) needed for project completion. The Cooperative Agreement states that Placer County will perform ROW activities and the Caltrans ROW will provide oversight (California Department of Transportation 1999).

1.6.2 California Department of Transportation

Discretionary actions required by Caltrans for project implementation consists of the following:

- Certification of the EIR,
- Approval of the proposed highway improvements,
- Approval of final engineering designs and advertisement of construction bids for the approved project,
- Approval of ROW Certification for the approved project for SR 28 widening,
- Approval to award the construction contract for the approved project, and

- Granting of encroachment permit.

1.6.3 Other Agencies Approval and Permits Required

The following agencies are expected to use this EA/EIR/EIS for approval of the following actions:

- California Department of Fish and Game (CDFG)—Section 1602 Streambed Alteration Agreement,
- LRWQCB—Clean Water Act (CWA) Section 401 Water Quality Certification,
- U.S. Army Corps of Engineers (USACE)—CWA Section 404 (Nationwide) permit,
- Tahoe Regional Planning Agency Linear Facilities Permit, and
- California Department of Parks and Recreation (DPR) Office of Historic Preservation.

1.6.4 Federal Highway Administration under the National Environmental Policy Act

Discretionary actions required by the FHWA as the lead agency under NEPA for project implementation consists of the following:

- Certification of compliance with NEPA, Section 106 of the National Historic Preservation Act (NHPA), Section 7 of the federal Endangered Species Act (ESA), federal Clean Air Act (CAA), Section 404 of the CWA, and Executive Orders 11988 (floodplain management), 11990 (wetland protection), 12898 (environmental justice), and 13112 (invasive species);
- Approval of the proposed improvements (preferred alternative or one of the other alternatives); and
- Approval of programmed federal funding for the approved project.

1.6.5 California Department of Transportation under the Federal Highway Administration and National Environmental Policy Act

Caltrans is working as FHWA's agent for NEPA compliance. Other agencies are expected to use this environmental document for approval of the proposed action, either in part or in whole. Those agencies and their anticipate actions are as follows:

- Certification of compliance with CEQA,
- USACE—Section 404 permit under the CWA,
- LRWQCB—Section 401 Water Quality Certification, and
- CDFG—1602 Streambed Alteration Agreement.

1.6.6 Tahoe Regional Planning Agency

- An amendment to the Transportation Element of the KBCP for Alternatives 2 or 4, if adopted, to call for a reduction to three travel lanes on SR 28.
- Certification of the environmental impact statement (EIS).
- Approval of the proposed improvements.
- Granting of Tree Removal Permit

1.7 Tahoe Regional Planning Agency Thresholds

Because TRPA is responsible for compliance with TRPA code and discretionary approval, this document addresses TRPA's environmental requirements and is an EIS under TRPA requirements. The objective of the Tahoe EIP is to assist in the achievement of the Environmental Thresholds Carrying Capacity (ETCC), which are standards required by Public Law 96-551 (Tahoe Regional Planning Compact) and adopted for the Tahoe Region in 1982 by TRPA. Thresholds are contained and identified in the TRPA Code of Ordinances (Code). There are nine categories of thresholds programs: 1) Water Quality Program, 2) Scenic Resources Program, 3) Soil Conservation/SEZ Program,

4) Recreation Program, 5) Noise Program, 6) Air Quality/Transportation Program, 7) Fisheries Program, 8) Vegetation Program, and 9) Wildlife Program. Specific thresholds are included in *Chapter 3*. As part of this EIR, studies were carried out to ensure that the proposed action will not adversely affect the ability to meet the thresholds in the Tahoe Basin.

1.8 Areas of Known Controversy

It is anticipated that the selection of the build alternative will result various areas of controversy, depending on the particular alternative selected. Areas of known controversy include the following.

- **Traffic congestion:** The three-lane alternatives would modify SR 28 from a four-lane cross section roadway to a three-lane cross section roadway, which would result in more traffic congestion than the four-lane alternative.
- **Pedestrian mobility:** The traffic congestion associated with the three-lane alternatives would not occur under the four-lane alternative, but this alternative would result in less room for sidewalks due to the extra lane, which could result in less pedestrian mobility along the KBCC.
- **Economic impacts:** Having less pedestrian and bicycle mobility under the four-lane alternative could result in fewer economic benefits to the KBCC area than would occur under the three-lane alternative because less pedestrian and bicycle mobility could result in fewer shoppers in the KBCC area. In addition, disruption to business activities, and the alteration of business properties to include limited access or changes in access could also have economic impacts. In addition, businesses near roundabouts under the three-lane alternative may experience fewer economic benefits than under the four-lane alternative due to access issues that could occur due to the roundabouts.
- **Parking:** The proposed action could result in the removal and relocation of on-street parking to off-site parking lots.

- **Transit:** The potential for increased congestion under the three-lane alternatives could disrupt/degrade the on-time performance of the Tahoe Area Regional Transit (TART) program.
- **Traffic diversion:** The potential for increased congestion under the three-lane alternatives could result in drivers diverting onto parallel local roads.
- **Pedestrian crossing:** The wider lanes associated with the four-lane alternative could make pedestrian crossing across SR 28 more difficult, compared to the three-lane alternative.
- **ROW acquisition:** Areas where projects will have impacts outside the existing Caltrans ROW are also expected to be a controversial part of this action.
- **Drainage/Stormwater Control:** The proposed action would increase stormwater runoff. Existing stormwater drainage facilities are inadequate to carry volumes and do not provide water quality features to meet NPDES permit requirements.