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STAFF REPORT

Date: April 21, 2021  
To: TRPA Governing Board  
From: TRPA Staff  
Subject: Adoption of the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy

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Summary and Staff Recommendations:

Staff recommends Governing Board approval of the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy and associated Initial Environmental Checklist.

Tahoe Transportation Commission (TTC) Recommendation:

At its April 2021 meeting, the TTC of the Governing Board recommended approval of the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy.

Environmental Improvement Transportation and Public Outreach Committee (EITPO) Recommendation:

This item is scheduled for EITPO recommendation of the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy prior to Governing Board in April.

Required Motions:

In order to approve the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy, Attachment A, the Board must make the following motions as the Tahoe Regional Planning Agency (TRPA), the Tahoe Metropolitan Planning Organization (TMPO), and the Regional Transportation Planning Agency (RTPA) in California.

TRPA Governing Board Actions:

- I. A motion to make the finding of no significant effect, for the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy, as provided in Attachment D.
- II. A motion to adopt TRPA Resolution 2021-\_\_, adopting 2020 Linking Tahoe: Regional Transportation Plan/ Sustainable Communities Strategy in Attachment F1.

In order for motions to pass, an affirmative vote of at least four Board members from each state is required.

TRPA Governing Board Actions, acting as the Regional Transportation Planning Agency in California:

- I. A motion to make a Negative Declaration based on an Initial Study prepared under the California Environmental Quality Act (CEQA) for the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy, as provided in Attachment B .
- II. A motion to approve TRPA Resolution 2021-\_\_, adopting 2020 Linking Tahoe: Regional Transportation Plan/ Sustainable Communities Strategy acting as the Regional Transportation Planning Agency for the Lake Tahoe Region as provided in Attachment F2.

In order for motions to pass, an affirmative vote of any eight Board members is required.

Background:

On September 11, 2020, TRPA/TMPO released the Draft Linking Tahoe: 2020 Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS), and the associated environmental analysis in accordance with Article VII of the Tahoe Regional Planning Compact, Chapter 3 of the TRPA Code of Ordinances, and the California Environmental Quality Act (CEQA). The [Final Draft 2020 RTP/SCS](#) is online and all relevant comments have been incorporated. On April 9, 2021, the TRPA TTC recommended the full Plan approval of the RTP/SCS and on April 14, 2021, TRPA APC followed with a recommendation of approval to Governing Board on the RTP/SCS Goals and Policies. The EITPO Committee will review the RTP at the April 28, 2021 meeting prior to Governing Board and TRPA/Tahoe Metropolitan Planning Organization Governing Board final action.

Plan Description:

The 2020 RTP/SCS sets forth the blueprint for a comprehensive transportation system to serve resident, employee and visitor needs of the Lake Tahoe Region and meet regional goals over the next 25 years. The plan identifies a long-term vision; regional transportation goals; and supportive projects, policies, and programs designed to meet these goals. The 2020 RTP/SCS is designed to reduce mobile source greenhouse gas (GHG) emissions and reduce dependency on the automobile and associated vehicle miles travelled (VMT). This RTP/SCS goes beyond the California Air Resources Board (CARB) GHG reduction target for the Tahoe Region and delivers additional GHG and VMT improvements. The 2020 RTP/SCS strategies are oriented on Transit, Trails, Technology and our Communities.

The 2020 RTP/SCS integrates and satisfies TRPA Compact, State, and Federal transportation planning requirements. The plan implements the TRPA Regional Plan and includes an update to the Transportation Element of the TRPA Goals and Policies. Acting as the federally recognized Metropolitan Planning Organization (MPO), this plan satisfies federal planning requirements identified in 23 CFR 450. As an MPO in California, the plan also serves as the updated Regional Transportation Plan/Sustainable Communities Strategy aimed at reducing mobile sources of greenhouse gas emissions in accordance with California SB 375. It also satisfies the MPO requirement in Nevada and responds to and informs emerging Nevada GHG reduction and climate change policy.

The 2020 RTP/SCS continues to refine and improve upon previous RTPs and transportation policies established for the Lake Tahoe Region. It builds on the 2012 TRPA Regional Plan that focused on making town centers more transit friendly and walkable/bikeable by enabling higher density, mixed-use development and redevelopment. The 2020 RTP/SCS adds emphasis on achieving seamless region-wide connectivity between neighborhoods, town centers, and recreation destinations. The plan includes a framework of transportation strategies, financial element, monitoring and project list that was developed

through several committee meetings, public meetings and webinars, stakeholder meetings and one-on-one meetings with the public.

Public Outreach and Collaboration:

Public outreach and partner collaboration is essential for the development of a supported and coordinated Plan. Public outreach for the Plan started in the summer of 2020 and has continued through this month. The plan was formally out for public comment for 45 days, closing on October 25, 2020. To date over 53 public meetings (both in person and virtual), online webinars drawing over 500 participants, and outreach videos reaching 2,383 people all provided valuable input to help shape the Final Draft Plan. The plan was developed to reflect an envisioned regional system that represents the priorities of local and regional implementors, state interests, environmental and NGO groups, and public feedback.

This Plan advances project and funding recommendations from the Bi-State Consultation on Transportation convened over the last two years by California and Nevada state leaders. The Plan also provides a foundation to establish new sustainable funding for transportation. In addition to the public, several standing and ad hoc committees helped shape the plan including, Tahoe Transportation Commission; Environmental Improvement Program, Transportation, and Public Outreach Committee of the TRPA Governing Board; Transportation Technical Advisory Committee; and Tahoe Transportation Implementation Committee, among others.

Over 55 comments have been received and incorporated into the final draft. A table of all public comments received is included in **Attachment C**. Several comments received expressed the need for getting projects completed faster, the need for more data and evaluation of day user impacts, support for more bike and pedestrian improvements, support for exploring on-demand transit shuttles, and the need for evacuation planning. The majority of changes in response to comments to the document were made in the following sections:

- Chapter 3: The Plan, adding details about Day Visitors and expanding details on mobility hubs;
- Chapter 4: Funding the Plan, adding more details about the development of new transportation funding with the Bi-State Partnership;
- Appendix A: Goals and Policies, additions to ensure collaboration with federal and tribal partners, considerations to neighborhood compatibility and creating safe transportation options and overall system.
- Appendix B: Project List, defining and identifying regionally significant projects and making updates to project costs and implementation timeframes;
- Appendix C: Revenue Narrative, worked with our funding partners to provide the most up to date information on revenues, now including new federal relief funding and recent tax measures;
- Appendix G: Data and Forecasting now includes a more robust section on Trip Reduction Impact Analysis 2.0;
- Appendix I: Performance Measures now includes more details on Federal Performance Measures

### The Plan Summary:

Lake Tahoe's transportation system serves a variety of users that fall into three distinct groups: residents, commuters, and visitors. In order to plan for different user groups, it is necessary to know "who" is using the system, when and how they are traveling, the purpose of their trip, and where they are traveling to and from. This informs the design of a transportation system that can respond to diverse needs and can scale with the variability of visitation in different seasons. The strategies for serving all users include managing demand on the system through both traditional and non-traditional mechanisms including changing densities and the mix of land uses; improving transit, trails, and technology; and as a result, creating sustainable walkable, bikeable, and transit-oriented communities. RTP/SCS strategies include the following:

Travel Demand Management to shift travel choices away from the private automobile through enhanced transit access in neighborhoods, employer trip reduction programs, real time travel information, parking management and paid parking, and the marketing of travel options. This also includes TRPA using its unique and complementary regional land use planning role to enable higher densities and mixed uses to reduce the demand for automobile travel.

Transit services added strategically over the next 25 years to provide 15-minute service between town centers and popular recreation destinations; 30- to 60-minute service between neighborhoods and town centers; and inter-regional service for commuters and visitors from neighboring regions. Starting with foundational services that meet daily needs, including those of transit-dependent riders and employees, makes it easier for recreational travelers to use transit to travel around the Tahoe Region, and assures visitors to Tahoe that they can do so without their personal automobiles. The Plan also includes the use of technology and expanded partnerships to supply on demand shuttles serving town centers and recreation areas.

Trail network enhancements including completion of the Tahoe Trail and filling community gaps in the system. This includes shared-use paths, sidewalks, bicycle lanes, crosswalks, and Americans with Disabilities Act facilities. Completing the network is critical in order to increase trips by foot and bike in the Region by providing a connected system of walking and biking routes. Between 2018 and 2019, bike paths and sidewalks at Tahoe have recorded a 15 percent increase in summertime use. Completing the Tahoe Trail through tough terrain in Incline and Emerald Bay are included in the plan as well as adding more local trails connecting neighborhoods like the greenway across the south shore.

Technology creates opportunities to better connect people with information about the many ways to travel around the Region, expands the availability of charging facilities for electric vehicles throughout the Region, and provides better data for decision-making by TRPA and its many partners. The plan identifies real-time travel information, parking availability, and other online interactive travel tools aimed at reducing transportation's impact on the environment by helping people make more informed travel decisions. The plan also includes the need for better technology infrastructure to support these improvements.

Communities are where elements of transit, trails, and technology converge with land use to improve quality of life and experience. TRPA and partners utilize a corridor planning framework to focus on specific issues and needs in defined areas around the region and develop a comprehensive and coordinated management plan. This includes enhancing the Region's economic vitality by more efficiently connecting workers to jobs, visitors to recreation hot spots, residents to town centers,

and freight to businesses. The SR89 and SR28 Corridor Management Plans have moved into implementation, and new plans recently approved include the Resort Triangle Transportation Plan in North Lake Tahoe, and Main Street Management Plan associated with the South Shore Community Revitalization Project. In addition, the planning for the US50 East Corridor Management Plan in Nevada is now also underway.

#### Priorities and Funding:

The region's transportation challenges, and the solutions needed to address them have been long understood, though without reliable funding to achieve the highest priority goals. The plan acknowledges the momentum around establishment of new regional funding sources and provides a unified transportation vision and analysis of the benefits of such revenues. The Bi-State Consultation on Transportation reconvened in 2019, led by the CA Natural Resources Secretary and NV Department of Conservation and Natural Resources Director, following the adoption of the 2017 RTP/SCS. The Sustainable Funding Initiative is looking at new ways of funding RTP projects that will make the biggest difference to reduce VMT and meet other required challenges. This renewed collaboration to fund the delivery of key projects identified by the Bi-State Consultation includes TRPA, Tahoe Transportation District, local and regional partners, and non-profits to establish sustainable revenue across a multi-sector partnership. With the Sustainable Funding Initiative, a comprehensive workplan has been activated and is guiding the regional consensus process driving toward a funding proposal in 2021. The proposal will recommend appropriate federal, state, and local legislative and administrative actions. The Sustainable Funding Initiative will identify priority investments from the RTP to demonstrate the sustained funding need, and will evaluate various funding mechanisms, including review of the findings from previous funding studies.

The plan also reflects recent local government and private transportation investments in some areas around Tahoe as transportation continues to be an important priority. This is in response to federal and state grants that are now requiring higher and higher local matching funds. Large federal and state infrastructure grants (BUILD, INFRA, AHSC, SB1, etc.) often require a minimum of 50% or more in matching funds to be competitive. This currently limits the Region in how proactive it can be in going after the multitude of federal and state transportation grant programs.

The revenue forecasted in the plan is a reasonable estimate from all sectors; local, private, regional, state and federal, of what the region is likely to receive from anticipated funding sources during the life of the plan. The forecast reflects historically available funding levels, a reasonable expectation of success with discretionary grants, and a new regional revenue estimate being actively pursued as part of the Sustainable Funding Initiative.

#### Environmental Review:

On September 10, 2020, TRPA/TMPO issued a Notice of Intent and Notice of Availability (NOI/NOA) and a joint environmental document consisting of an Initial Study/Mitigated Negative Declaration and Initial Environmental Checklist/Finding of No Significant Effect, referred to hereafter as the Initial Study/Initial Environmental Checklist (IS/IEC), for the proposed 2020 RTP/SCS. The IS/IEC was developed in compliance with the California Environmental Quality Act (CEQA, Public Resources Code Section 21000 et seq.), CEQA Guidelines, and TRPA Compact, Code of Ordinances and Rules of Procedures. The Final [IS/IEC](#) is available online and copies by request.

The IS/IEC examines updates to the policies and project list from the 2017 RTP/SCS and incorporates mitigation from the 2012 RTP/SCS EIR/EIS and new VMT per capita Threshold Standard. For the majority

of impact topic areas, the changes in policy and the project list create no impacts beyond those already disclosed by the 2017 and 2012 environmental review. Environmental impact topic areas where regulations have changed, and therefore more detailed discussion is included, are: Transportation, Greenhouse Gases, Air Quality, and Recreation. The IS/IEC discloses no unmitigated significant impact and TRPA therefore relies on the IS/IEC to support a Mitigated Negative Declaration/Finding of No Significant Effect.

Threshold Findings:

TRPA Code Chapter 3 and 4 required findings are included in Attachment D, and the Threshold Indicators and Compliance Measures Tables are included in Attachment E.

Contact Information:

For questions regarding this agenda item, please contact Michelle Glickert, Principal Transportation Planner, at (775) 589-5204 or [mglickert@trpa.gov](mailto:mglickert@trpa.gov).

Attachments/Hyperlinks:

- A. [2020 Linking Tahoe: RTP/SCS and IEC](#)
- B. [2020 RTP/SCS IS/IEC](#)
- C. 2020 RTP/SCS Comment Summary Matrix
- D. 2020 RTP/SCS Findings
- E. Threshold Indicators and Compliance Measures Checklist (Governing Board Agenda Item VII.A VMT – Attachment B)
- F. Resolutions
  - F1. TRPA
  - F2. RTPA

Attachment A

[2020 Linking Tahoe: RTP/SCS and IEC](#)

Attachment B

[2020 RTP/SCS IS/IEC](#)



Attachment C

2020 RTP/SCS Comment Summary Matrix

| Draft 2020 Regional Transportation Plan Public Comment Record |                       |  |               |  |                  |
|---|-----------------------|--|---------------|--|------------------|
| Number  | Name                  | Organization Type                            | Date Received | Summary of Comment   | Date of Response |
| 1   | Jacque Chandler       | Sustainable Tahoe                            | 3/11/2020     | Webinar - 1000% support TRANSIT  | 3/17/2020        |
| 2   | Dale Roberts          | Resident                                     | 9/14/2020     | more transit - Meyers via Pioneer Trail  | 9/21/2020        |
| 3   | Gary Himes            | Resident                                     | 9/15/2020     | more transit - to Carson City  | 9/21/2020        |
| 4   | Eric C Paine          | Resident                                     | 9/14/2020     | more transit - Meyers before 2036  | 9/18/2020        |
| 5   | Carole Black          | Resident                                     | 10/25/2020    | Include short term rental data and trends, address impacts of day trippers, only include project specificity if a comprehensive review and process is complete, Evacuation plan needed; apposed Incline mobility hub as TTD proposed | 10/14/2020       |
| 6   | Ed Hancock            | Resident                                     | 9/11/2020     | Meyers hub and transit needed  | 9/11/2020        |
| 7   | TTD Hearing Comments  | Various                                      |               |  |                  |
| 8   | Pete Todoroff         | Resident                                     | 9/11/2020     | Evacuation plan needed   | 9/11/2020        |
| 9   | Andy Chapman          | Incline Village/Crystal Bay Visitor's Bureau | 10/21/2020    | Questions about prioritizing Tahoe Trail segment between Kings Beach and Incline Village through Crystal Bay   | 10/21/2020       |
| 10  | Jack Hubbard          | Resident                                     | 10/19/2020    | opposed Incline mobility hub as proposed by TTD  | 10/19/2020       |
| 11  | Niobe Burden          | Resident                                     | 10/21/2020    | supports charging at recreation sites, paid parking and reservation systems  | 10/21/2020       |
| 12  | Ronda Tycer           | Resident                                     | 10/9/2020     | opposed Incline mobility hub as proposed by TTD  | 10/9/2020        |
| 13  | Chris McNamara        | Resident                                     | 9/12/2020     | supports increasing bike and walk trips  | 9/12/2020        |
| 14  | Kathie Julian         | Resident                                     | 10/12/2020    | opposed Incline mobility hub as proposed by TTD; work force housing needed there   | 10/21/2020       |
| 15  | Jennifer Quashnick    | Friends of West Shore                        | 10/21/2020    | RTP doesn't meet VMT capacity standard; doesn't adequately address visitor traffic (day use); fails to ID adequate funding; Checklist fails to incorporate new significant information   | 10/21/2020       |
| 15a   |                       | Friends of West Shore                        | 10/21/2020    | concerned with elimination of absolute VMT standard  |                  |
| 15b   |                       | Friends of West Shore                        | 10/21/2020    | IS/IEC is unclear regarding VMT impacts  |                  |
| 15c   |                       | Friends of West Shore                        | 10/21/2020    | Day visitor VMT is underestimated and no adequate mitigation provided to address this  |                  |
| 15d   |                       | Friends of West Shore                        | 10/21/2020    | Support GHG metric but this does not replace capacity based standard   |                  |
| 15e   |                       | Friends of West Shore                        | 10/21/2020    | Uncapped VMT affects water quality, noise, and public safety   |                  |
| 15f   |                       | Friends of West Shore                        | 10/21/2020    | RTP funding is inadequate  |                  |
| 15g   |                       | Friends of West Shore                        | 10/21/2020    | residents should not bare cost of visitor induced impacts  |                  |
| 15h   |                       | Friends of West Shore                        | 10/21/2020    | IEC fails to consider new relevant info re: climate change, visitation, gps app based travel, increased demand for recreation, short term rentals. Should not rely on previous analysis.   |                  |
| 15i   |                       | Friends of West Shore                        | 10/21/2020    | Peak congestion should be used instead of averages   |                  |
| 16  | Jay Buelton           | Resident                                     | 10/12/2020    | supports Incline mobility hub as proposed by TTD   | 10/21/2020       |
| 17  | Doug Flaherty         | Resident                                     | 10/12/2020    | opposed Incline mobility hub as proposed by TTD; work force housing needed there   | 10/21/2020       |
| 18  | Karen Johnson         | Resident                                     | 10/15/2020    | opposed Incline mobility hub as proposed by TTD  | 10/15/2020       |
| 19  | Patricia Moser Morris | Resident                                     | 10/12/2020    | opposed Incline mobility hub as proposed by TTD  | 10/12/2020       |
| 20  | Carina Cutler         | Resident                                     | 10/15/2020    | supports water transit sooner, supports toll stations, prioritize safety   | 10/15/2020       |
| 21  | Emily Setzer          | Resident                                     | 10/15/2020    | Kings Beach Brockway Trail to be built by 2025; North Tahoe Regional Trail pushed up to be built by 2035   | 10/15/2020       |
| 22  | Tobi Tyler            | Resident                                     | 10/23/2020    | concerned about development increases conflicting with transportation challenges   | 10/15/2020       |
| 23  | Sarah Miller          | Resident                                     | 10/19/2020    | opposed to: charging resident fees, new parking lots along shoreline for tourists, Incline mobility hub  | 10/23/2020       |
| 24  | Ian Gover             | Resident                                     | 10/20/2020    | favors trail connections and bike paths, more crossings on SR28 near Cedar Flats are needed  | 10/22/2020       |
| 25  | Kathryn Kelly         | Resident                                     | 10/20/2020    | Supports: free and frequent transit, ferry, bikeshare, trail connections, Incline hub as proposed by TTD, charging fees at rec sites and for cars entering the region  | 10/22/2020       |
| 26  | Teri Thuma            | Resident                                     | 10/21/2020    | evacuation plan needed w/ associated corridor parking management; programs needed for responsible tourism  | 10/22/2020       |
| 27  | Jerry Winters         | Resident                                     | 10/22/2020    | concerned with VMT standard and proposed change; RTP does not adequately address visitors and day use (FOWS Form letter)   | 10/22/2020       |
| 28  | Alex Padilla          | Caltrans                                     | 10/22/2020    | Make sure performance measures section references MPO requirements (23 CFR Parts 450 and 771 and 49 CFR Part 613). Needs a system performance report evaluating performance targets  | 10/22/2020       |
| 28a   |                       | Caltrans                                     |               | Include description of TRPA coordination efforts with Caltrans and NDOT in Chapter 5   |                  |
| 28b   |                       | Caltrans                                     |               | Include summary of requirements for PM1, PM2, and PM3 - Look at Amendment 1 to Caltrans/NDOT/TRPA MOU. Include descriptions and explanation of all 18 of the PMs listed in the MOU   |                  |
| 28c   |                       | Caltrans                                     |               | Need discussion on how TRPA will plan and program projects to achieve CA performance targets. Should be done for each PM   |                  |
| 28d   |                       | Caltrans                                     |               | Need discussion on Transit Asset Management in Chapter 5. TRPA TAM requirements, local/state targets for TAM, discussion on how TRPA incorporates TAM into planning  |                  |
| 28e   |                       | Caltrans                                     |               | Chapter 5 needs section summarizing PTASP PM requirements including timeline, links to investment priorities, etc.   |                  |
| 28f   |                       | Caltrans                                     |               | Clarify new local/regional funding sources in financial section and how they are reasonably foreseeable  |                  |

| Draft 2020 Regional Transportation Plan Public Comment Record |                      |                             |               |   |                      |
|---|----------------------|-----------------------------|---------------|---|----------------------|
| Number  | Name                 | Organization Type           | Date Received | Summary of Comment  | Date of Response     |
| 28g   |                      | Caltrans                    |               | Need more clarity on what the regional revenue source will be - One Tahoe or something else (i.e. user fee, basin entry fee, etc.). Also concerned these are listed as "constrained"  |                      |
| 28h   |                      | Caltrans                    |               | List which projects are "regionally significant" based on p. 136 in Regional Transportation Plan guidelines   |                      |
| 28i   |                      | Caltrans                    |               | Explain how federal land management agencies participated in development of RTP   |                      |
| 28j   |                      | Caltrans                    |               | Checklist should be updated to capture full discussion on highways and interregional connectivity   |                      |
| 28k   |                      | Caltrans                    |               | Add RTP checklist as new appendix J in RTP. Appendix I should also be included in RTP checklist   |                      |
| 28l   |                      | Caltrans                    |               | Cite new CA Freight Mobility Plan on page 194   |                      |
| 28m   |                      | Caltrans                    |               | Provide model files to Caltrans for review  |                      |
| 28n   |                      | Caltrans                    |               | Double check page numbers on RTP w/ and w/o appendices to make sure they match  |                      |
| 28o   |                      | Caltrans                    |               | Add list of Caltrans projects to the project list (US 50 safety project, SR89/Fanny Bridge, SR 28 RSA at Grove Street, SR28 Gateway to Kings Beach)   |                      |
| 29  | Alex Padilla         | Caltrans                    | 10/22/2020    | Add US 50 and Fanny Bridge projects to list and financial plan appendices   | 10/22/2020           |
| 30  | Lori Cress           | Resident                    | 10/23/2020    | concerned with VMT standard and proposed change; RTP does not adequately address visitors and day use (FOWS Form letter)  | 10/22/2020           |
| 31  | Sue Gaskill          | NV Dept. of Water Resources | 10/23/2020    | Comply with all NV water laws; water used for construction shall be provided by a utility or under permit   | 10/23/2020           |
| 32  | Dana Schneider       | Resident                    | 10/23/2020    | concerned with VMT standard and proposed change; RTP does not adequately address visitors and day use (FOWS Form letter)  | 10/23/2020           |
| 33  | Ellie Waller         | Resident                    | 10/23/2020    | Opposed to Elimination of VMT cap; plan gives up on controlling visitor traffic; need real solutions for parking and transit; outcomes and goals must be practical; day use analysis needed; carrying capacity is an issue; need to revisit RPU and correlation to Goals and Policies; recreation can be a double-edged sword | 10/23/2020           |
| 34  | Tom Mooers           | Sierra Watch                | 10/23/2020    | Adopt an RTP that complies with the absolute VMT standard   | 10/23/2020           |
| 35  | Mark Costa           | NDOT                        | 10/23/2020    | Specific comments on NV projects and revenue assumptions. Asking for clarification on certain goals, policies, projects, and funding assumptions.   | 10/23/2020           |
| 36  | Nicole Rinke         | Cal AG                      | 10/23/2020    | AG claims the RTP has separated VMT generated by visitor/population growth  | Several Mtgs         |
| 36a   |                      | Cal AG                      | 10/24/2020    | the RTP/SCS does not meet or achieve TRPA's existing environmental threshold for VMT  |                      |
| 36b   |                      | Cal AG                      | 10/25/2020    | IS/IEC does not appropriately analyze the RTP/SCS's VMT impacts   |                      |
| 36c   |                      | Cal AG                      | 10/26/2020    | IS/IEC inappropriately tiers off of the 2012 RTP/SCS Regional Plan Update EIR/EIS   |                      |
| 36d   |                      | Cal AG                      | 10/27/2020    | IS/IEC fails to conclude that VMT is a significant impact that requires mitigation  |                      |
| 36e   |                      | Cal AG                      | 10/28/2020    | IS/IEC fails to substantiate the RTP/SCS's compliance with CARB's required GHG reductions   |                      |
| 36f   |                      | Cal AG                      | 10/29/2020    | IS/IEC's VMT analysis relies on reductions calculated through the Trip Reduction Impact Analysis (TRIA) tool,3 but these reductions are not adequately explained, quantified, or substantiated.   |                      |
| 37  | Steve Teshera        | Tahoe Chamber               | 10/23/2020    | Recognize substantial funding shortfall and need for regional revenue work plan. Would like to see transit improvements accelerated beyond incremental timeline outlined in RTP. Need clarity on travel behavior and a call out on day-visitors.  | 10/23/2020 & 2/21/21 |
| 38  | Kelly Beede          | Town of Truckee             | 10/23/2020    | transit distinction between Truckee and Tart, clarification on mobility hubs and intercept lots, clarification on 267/28 managed lane project   | 10/23/2020           |
| 39  | Doug & Valerie Welch | Resident                    | 10/23/2020    | concerned w/VMT standard and day visitor impacts  | 10/23/2020           |
| 40  | Mimi Morris          | Resident                    | 10/23/2020    | VMT Standard (FOWS Form Letter)   | 10/26/2020           |
| 41  | Ron Grassi           | Resident                    | 10/24/2020    | VMT Standard  | 10/26/2020           |
| 42  | Gavin Feiger         | Bicycle Coalition           | 10/25/2020    | Add Caltrans SHOPP project 4210 to project list ( <a href="https://www.laketahoeinfo.org/Project/Detail/4210">https://www.laketahoeinfo.org/Project/Detail/4210</a> )   | 10/21/2020           |
| 42a   |                      | Bicycle Coalition           | 10/25/2020    | Enhance discussion on SRTS projects and planning. Need more focus on this beyond South Shore  |                      |
| 42b   |                      | Bicycle Coalition           | 10/25/2020    | Would like to see more bicycle and pedestrian counters proposed for pre and post project monitoring   |                      |
| 43  | Gavin Feiger         | League to Save Lake Tahoe   | 10/25/2020    | Constrained vs Unconstrained project lists hard to follow in RTP App. B   | Several Mtgs         |
| 43a   |                      | League to Save Lake Tahoe   | 10/25/2020    | would like to see schedule, work plan, and progress reports for Commute Tahoe   |                      |
| 43b   |                      | League to Save Lake Tahoe   | 10/25/2020    | Would like to see specific parking management strategies, including code changes for parking maximums   |                      |
| 43c   |                      | League to Save Lake Tahoe   | 10/25/2020    | Plan should contain flexibility/adaptive management to prioritize transit projects based on performance based measures using TDA authority  |                      |
| 43d   |                      | League to Save Lake Tahoe   | 10/25/2020    | micro-transit should be priority. Recommends Camp Rich/Emerald Bay pilot be implemented as part of SR 89 or stand alone project as it is not in the RTP   |                      |

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|---|-----------------------|---|---------------|--|------------------|
| Number  | Name                  | Organization Type   | Date Received | Summary of Comment   | Date of Response |
| 43e   |                       | League to Save Lake Tahoe   | 10/25/2020    | Wants to add project to move bus stop near new housing project-Sugar Pine Village in CSLT  |                  |
| 43f   |                       | League to Save Lake Tahoe   | 10/25/2020    | TRPA should play regional role to promote implementation of trails projects  |                  |
| 43g   |                       | League to Save Lake Tahoe   | 10/25/2020    | TRPA should play lead role and prioritize developing technology such as trip planning tools  |                  |
| 43h   |                       | League to Save Lake Tahoe   | 10/25/2020    | smaller mobility hubs may be better approach to ensure implementation and funding  |                  |
| 43i   |                       | League to Save Lake Tahoe   | 10/25/2020    | strongly support community priority zones concept. Would like to see how unmet transit needs are reflected and overlap with town centers. Update maps to show community priority zones more closely  |                  |
| 43j   |                       | League to Save Lake Tahoe   | 10/25/2020    | Wants clarification on funding sources (local, regional); prioritize unconstrained projects based on VMT cost-effectiveness and mode share goals; include flexibility on phasing/timing based on performance measures  |                  |
| 43k   |                       | League to Save Lake Tahoe   | 10/25/2020    | focus fundraising to address \$3M deficit for active transportation projects   |                  |
| 43l   |                       | League to Save Lake Tahoe   | 10/25/2020    | clarify farebox revenue is from ferries and regional transit, not in Basin transit   |                  |
| 43m   |                       | League to Save Lake Tahoe   | 10/25/2020    | clarify revenue generated from rental car mitigation fee and if fees are collected from rideshare services   |                  |
| 43n   |                       | League to Save Lake Tahoe   | 10/25/2020    | clarify TIP update schedule and how it incorporates bi-state consultation or other priorities  |                  |
| 43o   |                       | League to Save Lake Tahoe   | 10/25/2020    | TRPA should enhance monitoring protocols (provides specific suggestions)   |                  |
| 43p   |                       | League to Save Lake Tahoe   | 10/25/2020    | League wants to be involved in developing schedule and integrating performance measures for tracking VMT generation by user type   |                  |
| 43q   |                       | League to Save Lake Tahoe   | 10/25/2020    | Would like to see more of App. D recommendations in plan   |                  |
| 43r   |                       | League to Save Lake Tahoe   | 10/25/2020    | Emphasize environmental justice more in plan. Supportive of adopting definition for DAC specific to Tahoe  |                  |
| 43s   |                       | League to Save Lake Tahoe   | 10/25/2020    | Stalene Community Priority Zone missing from Table 23  |                  |
| 43t   |                       | League to Save Lake Tahoe   | 10/25/2020    | Clarify how TRIA RTP trip rates compare to Placer County and interim project level guidance  |                  |
| 43u   |                       | League to Save Lake Tahoe   | 10/25/2020    | Clarify TRIA GHG benefits, how intercept lots/parking mgmt. applies; conduct sensitivity analysis  |                  |
| 43v   | IS/IEC Comments       | League to Save Lake Tahoe   | 10/25/2020    | Need to acknowledge if degree of water quality benefits will be reduced due to road maintenance being deferred in 2020 plan vs 2017. Additional mitigation may be required   |                  |
| 43w   |                       | League to Save Lake Tahoe   | 10/25/2020    | Impacts of displacement of housing units from US 50 project should be disclosed  |                  |
| 43x   |                       | League to Save Lake Tahoe   | 10/25/2020    | Additional mitigation needed to offset VMT impacts   |                  |
| 43y   |                       | League to Save Lake Tahoe   | 10/25/2020    | VMT threshold is pre-determined and has not been adequately vetted   |                  |
| 43z   |                       | League to Save Lake Tahoe   | 10/25/2020    | Concerned that allocations are not withheld when VMT exceeded - propose early triggers and gradual responses   |                  |
| 44  | Sierra Club           | Organization  | 10/25/2020    | VMT Standard; Support GHG standard only if doesn't increase VMT; support AG & FOWS position  | 10/26/2020       |
| 45  | Christine Maley-Grubl | Truckee North Tahoe Transportation Management Association (TNT/TMA) | 10/26/2020    | Supports regional revenue momentum, including One Tahoe for funding shortfall and inclusion of Truckee and out of basin ski resorts; suggestion to use resident, commuter and visitor for user groups; need more intercity transit improvements; supports one-stop communication tool; emphasized importance of collaboration with Placer Co., Town of Truckee, Placer Co. Transportation Planning Agency and Nevada Co. Transportation Commission | 10/26/2020       |
| 46  | Julie Hutchinson      | Resident  | 10/25/2020    | VMT threshold standard should not be based on per capita   | 10/26/2020       |
| 47  | Steve Teshera         | Fire Chiefs   | 10/26/2020    | Emergency Evacuation enhanced in RTP and future  | 2/26/2021        |
| 48  | Stephanie Holloway    | Placer PW   | 10/24/2020    | Update mobility hub map, regional transit service, add parking management to map @ Kings Beach and Tahoe City; updates needed to project list  | 10/15/2020       |
| 49  | Ann Nichols           | North Tahoe Preservation Alliance                                   | 10/24/2020    | concerned with new funding proposal that includes "one Tahoe" and connections with "2020 Prosperity Center Report" tax increases; ineffectively addresses visitor travel and day only users; safety concerns with unrestricted VMT;  | 10/28/2020       |
| 50  | Layne McAvoy          | Resident  | 10/25/2020    | opposed to Incline bus hub as proposed by TTD; make better plans for the old elementary school than a bus hub  | 10/28/2020       |
| 51  | Carl Hasty            | Tahoe Transportation District                                       | 10/28/2020    | Policies need to include importance of technology to emergency management; suggests prioritizing policies and developing crosswalk that connects projects to policies  | Several Mtgs     |
| 51a   |                       | Tahoe Transportation District                                       | 10/28/2020    | project list missing TTD technology projects, specifically broadband and emergency management/evacuation projects  |                  |
| 51b   |                       | Tahoe Transportation District                                       | 10/28/2020    | Technology needs to reflect TTD goals and projects   |                  |
| 51c   |                       | Tahoe Transportation District                                       | 10/28/2020    | RTP should include entirety of Long Range Transit Master Plan to achieve transit goals   |                  |
| 51d   |                       | Tahoe Transportation District                                       | 10/28/2020    | Need better explanation of Microtransit services - how will they be funded so that they are free? What are performance measures for Microtransit? How can TRPA encourage private investment in transportation?   |                  |
| 51e   |                       | Tahoe Transportation District                                       | 10/28/2020    | Crosslake ferry should be public/private partnership - could not operate with private funding alone  |                  |

| Draft 2020 Regional Transportation Plan Public Comment Record |                   |                               |               |   |                  |
|---|-------------------|-------------------------------|---------------|---|------------------|
| Number  | Name              | Organization Type             | Date Received | Summary of Comment  | Date of Response |
| 51f   |                   | Tahoe Transportation District | 10/28/2020    | Enhance discussion on transit capital investments. Need to build transit capital before increasing transit service  |                  |
| 51g   |                   | Tahoe Transportation District | 10/28/2020    | Correct US 50 SSCR cost from \$100 million to \$156 million   |                  |
| 51h   |                   | Tahoe Transportation District | 10/28/2020    | Want regional revenue included in first five years of plan  |                  |
| 51i   |                   | Tahoe Transportation District | 10/28/2020    | Want clear association of fund source to specific projects and services. Need more robust discussion on required match funds for discretionary sources  |                  |
| 51j   |                   | Tahoe Transportation District | 10/28/2020    | Enhance explanation of farebox revenue - distinguish free local services from regional services that will collect fares   |                  |
| 51k   |                   | Tahoe Transportation District | 10/28/2020    | Enhance revenue section: explain assumptions on expected discretionary sources (Nevada, FLAP, USFS, BUILD, ARB, CA Energy Commission). Discuss these assumptions more broadly with TTIC partners  |                  |
| 51l   |                   | Tahoe Transportation District | 10/28/2020    | Environmental Justice appendix: include Tahoe Verde stops, clarify driving limits due to age  |                  |
| 51m   |                   | Tahoe Transportation District | 10/28/2020    | Reconcile shifts in Everyday, Discover, Visit Tahoe trips from 2017 plan to 2020 plan (discuss updated data source, refined/more accurate data)   |                  |
| 51n   |                   | Tahoe Transportation District | 10/28/2020    | Want explanation of population growth assumptions as they do not link up with AirSage assumptions on growth   |                  |
| 51o   |                   | Tahoe Transportation District | 10/28/2020    | Provide clear link between goals and objectives in RTP with VMT threshold update. Concerned the VMT mitigation for SB375 and SB743 will not capture visitor impacts. Also concerned that VMT update is focused on new development, rather than redevelopment. Suggests developing VMT fee structure and data system through Smart Cities approach |                  |
| 51p   |                   | Tahoe Transportation District | 10/28/2020    | Expand congestion management section to reflect shrinking shoulder system and typical seasonal congestion in winter and summer  |                  |
| 51q   |                   | Tahoe Transportation District | 10/28/2020    | Suggest future RTP development include chapter review by TTIC partners prior to public release of draft   |                  |
| 52  | Joe Shaefer       | Resident                      | 10/25/2020    | opposed to bus hub as proposed by TTD   | 10/28/2020       |
| 53  | Denise Davis      | Resident                      | 10/25/2020    | Get the visitor authorities involved to help promote transportation options; important that buses are frequent and reliable, won't work otherwise; commuters from Reno/Carson need transit options; evacuation concerns; opposed Incline mobility hub as proposed by TTD  | 2/5/2020         |
| 54  | Jon Davidson      | Resident                      | 10/25/2020    | opposed to bus hub as proposed by TTD; including using the site for Sr28 Corridor staging   | 10/28/2020       |
| 55  | Indra S. Winquest | IVGID GM                      | 10/25/2020    | opposed to transit ferry stop in Incline  | 10/28/2020       |
| 56  | Michele Koch      | Resident                      |               | opposed to bus hub as proposed by TTD   | 10/26/2020       |

## Kira Smith

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**From:** Devin Middlebrook  
**Sent:** Tuesday, March 17, 2020 10:59 AM  
**To:** Kira Smith; Michelle Glickert  
**Subject:** FW: SR-89 April 2 Webinar RSVP

Transit comment for RTP

Devin Middlebrook  
Sustainability Program Manager  
Long Range and Transportation Planning  
775-589-5230  
[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)



[trpa.org](http://trpa.org) | [facebook](https://www.facebook.com/trpa) | [twitter](https://twitter.com/trpa) | [instagram](https://www.instagram.com/trpa)



[takecaretahoe.org](http://takecaretahoe.org)

**From:** jacquie chandler <[sustaintahoe@gmail.com](mailto:sustaintahoe@gmail.com)>  
**Sent:** Wednesday, March 11, 2020 12:04 PM  
**To:** Devin Middlebrook <[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)>  
**Subject:** SR-89 April 2 Webinar RSVP

hey Devin,

I would like to RSVP for Digital Webinar and also apologize for my response at the IV Friday Community meeting.

I think you know my support for transit is 1000%. Just have *meeting fatigue* from going over the *same issues for 20 years* with minimal results, esp given the clarity of the lake.

*of the few I attended in reverence:*

Incline Village Vision  
TRPA Pathways 2007  
2010 Prosperity Plan

... consensus was always 100% for: "**Free Frequent and Fun Chicken train buses**" (public words) Transit, paid for by not only Property, Business tax, but also the Tourism industry driving the people into the basin, without taking responsibility for the cost of that 30M annual visitor carbon footprint!

And what happened to the \$7M in funding for a Solar Ferry (\$8M with interest)? Ask Hasty, as it seemed to go to studying the ability to park and dock, vs just buy 1 or 2 ferries that *land in sand*.

OK, so ***it is surely beyond obvious that transit is #1 key for increasing clarity*** and now that buses are FREE, we only have a few route gaps to fill:

1. Sand Harbor to Chimney beach and Kingsbury Transit Center
2. SLT to Homewood (bring Trolley back)
3. Frequency: 10 to 15 min stops for transit circling the Lake

Ridership increases? responsibility of tourism industry to promote.  
basically...

Step 1. Circle the Lake

Step 2. Rec Transit that carries bikes, SUP, strollers, etc

Step 3. Water transit connected to road transit

Since public feedback has supported, blessed and requested this since before 2000, what could possibly be missing except Political Will?

Please use the funds you have for more public meetings to fund the Sand Harbor to Stateline/Kingsbury Transit Center route before summer, as that would do so much to alleviate what is coming, (if we survive the Pandemic)

*with gratitude,  
Jacquie*

Jacquie Chandler  
Executive Director  
Sustainable Tahoe



PO 3206, Incline Village, NV 89450

775 413-9211

[www.sustaintahoe.org](http://www.sustaintahoe.org)

***...Walk Softly...Respect Wildlife...Share Gratitude***

## Michelle Glickert

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**From:** Dale Roberts <worldcycle@yahoo.com>  
**Sent:** Monday, September 14, 2020 11:21 AM  
**To:** Michelle Glickert  
**Subject:** TRPA Transportation Master Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi, a comment on the plan. There is a glaring lack of transportation along Pioneer Trail to Meyers and the North Upper Truckee area. For the life of me I cannot figure out why. People live there, people have VHR's there not affected by city rules (county). They also complete a natural ready made transit loop which would put more people within a 1/4 mile walking access area of a transit stop. Think about it. Stateline to Meyers via Pioneer Trail. Meyers to the "Y" via North Upper Truckee. The "Y" to Stateline via Highway 50. Buses run both directions. More access from Ski Run, Al Tahoe and Black Bart along Pioneer. There is very little residential other than Elks Club on Highway 50. Seems to me you are neglecting what could be a very efficient use of existing roadways to service the entire South Tahoe, Meyers and Stateline area.

Thanks  
Dale Roberts



## Kira Smith

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**From:** Gary Himes <himesgary@yahoo.com>  
**Sent:** Tuesday, September 15, 2020 5:44 AM  
**To:** Michelle Glickert  
**Subject:** busses

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

I used to ride from carson city to Stateline/Southlake Tahoe but, it was discontinued for a lack of funds... now, I would like to see it re-started once again- there are quite a number of people who use the bus and who either live there or work there. I, for one, used the bus to conduct business in both Stateline and Southlake and have not been able to do so since it was discontinued...there are a number of residents who live in Carson City and work in one of the two cities and vice-versa.

Please consider re-establishing a bus system between the above mentioned towns. Thank you.

## Kira Smith

---

**From:** Michelle Glickert  
**Sent:** Friday, September 18, 2020 4:06 PM  
**To:** Eric C Paine  
**Subject:** RE: Transit Plan

Thank you Eric for the comment. It is identified to start in 2036 although I know that feels just as far away as 2045. The thing about the project list is that if funds and desire come sooner, the project can certainly move ahead. The identification of the project in the RTP makes it eligible for funding. I am going to forward your comment, if this is o.k. with you, to the Tahoe Transportation District. They are likely going to be updating their short range transit plan soon so this feedback is just what they need.

Thank you again,  
Michelle  
p.s. love your tag line.

-----Original Message-----

From: Eric C Paine <epaine72@yahoo.com>  
Sent: Monday, September 14, 2020 10:15 AM  
To: Michelle Glickert <mglickert@trpa.org>  
Subject: Transit Plan

Good Morning,

Is there any way for Meyers community to get busing into City of South Lake and Stateline immediately? Wait for a plan for 2045 completion is crazy. We have young men and women eager to enter the work force that are paying as much as \$40 each time they Uber home on the weekend evenings. Let's start with transit from Meyers ASAP!

Thank you,

Eric C Paine  
You must be the change you wish to see in the world.

My comments below are focused on Incline Village/Washoe County Tahoe Area. TRPA addresses a broader geography, yet there may be comparable questions and concerns elsewhere. I recently read a scary article about a near miss escape from wildfire in a vacation community in Oregon where residents and firefighters trapped by a rapidly advancing wildfire near a reservoir mounted what was called a “last stand, hoping for a miracle”.\* It is a smaller lake than Tahoe. But, the evacuating crowd with roads blocked was also much smaller than we could see with our limited escape roads. I thus plead with you to:

**1. Address/limit total area occupancy during busy seasons as you develop TRPA/TTD’s Transportation proposals & consider revised WC proposed STR Regs & Tahoe Area Plan.** Even ignoring direct STR safety risks and neighborhood compatibility concerns (fires on decks, hot tubs over-heating, noise, trash, etc.), STRs contribute to a significant seasonal occupancy increase in IV. Evacuation capacity was viewed as marginal several years ago & the situation is not likely to have improved. Tax revenue is nice & I think you all may be lobbied by realtors, property managers, etc. with rationales I suspect mostly related to revenue. (Interestingly IV business owners that I have spoken to or heard second hand about haven't been as supportive.) Nonetheless, public safety has a value, & the current situation potentially places residents/visitors & thus WC & TRPA at increased risk.

**2. Sponsor comprehensive tourism management regulations in addition to added STR Neighborhood Compatibility regs to limit adverse area occupancy impacts.** IV’s adverse parking/traffic situation has multiplied with day visit influx for SLTT/Sand Harbor creating more risk. Despite efforts, failure to successfully manage traffic/parking on Rte 28 & nearby IV has worsened an already difficult situation. TRPA/TTD have some proposals but as best I can tell, like some of the recent adverse collateral experience along Rte 28, they may not be founded on comprehensive scenario planning which is essential to developing successful plans for complex problems. The proposed 2020 Transportation Plan appears based on assumptions which I believe may underestimate the current actual traffic volumes/issues & thus may not reliably deliver air quality or public safety results. I have listed some examples of data questions in the addendum below. Also wondering about the recently news article re potential TRPA vehicle fees which failed to address multiple components – for example, were the reported fee plan to be enacted as described, where would occasional owner visitor vehicle or more critically the STR vehicle avalanche fit in the fee mix? Will the proposal sufficiently and effectively impact the current situation?

Personally, I have spent >1 hr to go 3 mi. Kings Beach to IV. Others report similarly in feedback to WC recently re the STR Ordinance draft. **If a major wildfire erupts with urgent evacuation requirement, what is the potential public safety impact?** Please help your constituents & the tourism industry (which also won’t benefit from a catastrophe) with responsible, data-based regs to manage area occupancy & tourists/vehicles to safe overall levels & safe performance attributes for everyone's benefit.

**3. Get Public Input to proposals** in open presentation/discussion meetings before formal hearings. Input was obtained earlier and the plan development process has been extensive, but no open public discussion of the several current massive proposals has occurred via TRPA or WC. Interestingly the focused WC zoning changes for Emergency Communication Tower siting in remote areas and for abutting Industrial/Residential uses have had more public discussion than the sweeping implications of the massive zoning change embedded in the proposed STR regs or the substantive, potentially adverse IV impacts of proposed TRPA/TTD Transportation plans, particularly the apparently envisioned substantive IV “Mobility Hub.” Consider an evacuation situation – urgent exit required from Sand Harbor/ELTT area >> traffic jam of vehicles leaving those parking lots and nearby on street parking, plus bus loads of people to be moved to many, many vehicles parked at a transportation bus hub in IV with connecting buses incoming ... that plus residents, folks at local beaches all trying to leave on a very few roads ...!!!

Please provide comprehensive constituent input discussion opportunities. Perhaps we are misunderstanding the data/planning models or the recommendations? Current proposals appear based on potentially incomplete data/possibly insufficient assessment of current reality thus potentially leading to problematic conclusions. Good faith next steps should include public information sessions at both TRPA and Washoe County:

- TRPA should provide an education session on the Transportation data models, threshold estimates and evacuation plan impacts followed by presentation/open discussion of the Transportation plan with adjustment for any needed data updates/community input;
- and
- WC should offer information/open discussion sessions re the updated STR ordinance and Zoning elements as well as the proposed Tahoe Area Plan which will also impact area occupancy.

Thank you, Carole Black, MD (retired), Incline Village resident

\* [https://www.nytimes.com/2020/09/17/us/fires-oregon-detroit.html?campaign\\_id=9&emc=edit\\_nn\\_20200917&instance\\_id=22266&nl=the-morning&regi\\_id=138285706&section\\_index=2&section\\_name=three more big stories&segment\\_id=38344&te=1&user\\_id=f7ff7e3cf7124e0bca531ed98ff5904e](https://www.nytimes.com/2020/09/17/us/fires-oregon-detroit.html?campaign_id=9&emc=edit_nn_20200917&instance_id=22266&nl=the-morning&regi_id=138285706&section_index=2&section_name=three%20more%20big%20stories&segment_id=38344&te=1&user_id=f7ff7e3cf7124e0bca531ed98ff5904e)

## **Addendum: Sample TRPA Data/Assumption Questions**

**I. The Transportation Volume Measurement model** aims to understand travel behavior patterns. This is a terrific concept and a foundation essential to future model development. There are, however some important questions:

**A. “Everyday Travel”** - this section appears designed to capture and address travel volumes related to commutes and trips for errands, groceries, entertainment, etc and focuses on residents. It appears to rely on Population estimates based on census alone and focuses on local in area trips – mostly around town and allegedly mostly  $\leq 2$  miles.

What’s missing? This element may (or may not?) omit visitor/tourist trips for groceries, gas, ATM, restaurants, shopping, visiting friends, a park, taking a sight-seeing drive, etc - i.e., any trip, and there are many, that isn’t to/from home/work or considered elsewhere (e.g., to a designated recreation destination or to/from the Basin). This gap is particularly important with the recent locally documented significant increases in STRs/2019 STR occupancy! Interestingly the TRPA model, while including some factors related to STRs, does not seem to consider the significant increases that have been felt in Incline Village. Also where are trips by residents around/near the basin or Truckee for errands, shopping, medical/lab/pharmacy visits, etc captured?

And the plan? Unless I am misunderstanding the parameters of the planned “micro-transit” concept, the proposed program map in the report can’t possibly be correct if there is any interest in decreasing auto trips in town. The majority of the town area isn’t touched by other transit options and the transport service doesn’t touch entrance areas to several major stores. For example, if I understand this correctly, as an elder resident needing groceries in winter from my condo using this program, I would need to drag a cart down a long driveway, across a busy road, and then up or down a hill on an often poorly plowed icy, but paved, path to a bus stop, ride for a short distance, then drag my cart up another hill, this time either along a road or through a busy parking lot to the grocery store. After shopping, I would then repeat this process in reverse with the added challenge of maneuvering a loaded, now heavy cart and needing to travel down the hill often on an icy surface to the bus. Somehow, this sounds like a hip fracture or worse waiting to happen. Were getting me and others like me to

forego this short two-way car trip to be a serious goal within the village what might be helpful would be frequent shuttles/micro-transit around town or, even better, sponsoring grocery delivery services!

Similarly, for most STR visitors/residents going to a playground or beach or library or hairdresser or post office or bank, this plan offers no service. There are also 2 “dead end” spurs which travel along residential streets, don’t connect to any stores/businesses and ends in spots where there is no turnaround space for a bus – not clear what the plan for these is?? And the shading for ¼ mile to transit stops is pure fantasy at least currently; what’s more, ¼ mile on icy paths/streets in winter is overly optimistic and potentially unsafe!

Further organizing bus stops to the ELTT terminus and/or Sand Harbor along Rt 28 in IV so far has seemed to encourage visitor parking at commercial areas and further preclude resident access.

**B. “Discover Tahoe”** - this section intends to capture trips by residents and visitors who are “making longer trips to recreation areas around the region.” I am confused – how exactly were these trips counted? Were trips from IV residence/STR/Hotel/Motel/Timeshares to IV beach, golf, tennis, rec center, ELTT start or Diamond Peak parking counted? What about trips to the sledding areas in IV or along Mt Rose? What about a trip to an informal sledding or cross country skiing site along Rte 28 or Mt Rose Highway, etc, etc? How was IV winter ski shuttle addressed? Also in summer, if on the map from Kings beach to IV is red and from IV to rte 28 ELTT is red, yet the connecting IV segment is not, the IV beaches are private so where did the traffic go in the IV segment?

**C. “Visit Tahoe”:** Linking Tahoe segment intends to capture volumes entering and leaving the Basin, residents and tourists. Yet, this appears to be incomplete data on which to base a plan. What are the actual numbers vs % ages? Where did visitors go by arrival route? And how long were their Tahoe basin trips? Where else did they stop? And then there’s those all important evacuation plan considerations???

## II. Examples of questions in other sections include:

**A. Land Use and Transportation Connection:** Though the concept is mentioned, there is no adjustment that I can see for the use of residential properties as STRs, eroding actual residential availability. IV has >2000 STRs per an online website and about 7000 residences. If these properties are offered for rental an average of 50% of the year (and many are offered much more), then the equivalent of 1000/7000 residences evaporate as potentially available. Was this considered? The report mentions actual STR occupancy estimates (which seem low) but not offered for rental % ages – and on days when units are offered for rental, they cannot be available as residences.

The residential density map, while difficult to read is confusing. My condo building and adjacent building alone have a total of 6 units and I don’t think occupy an acre yet this map appears yellow in that area possibly reflecting an incorrect density??

## B. Greenhouse Gas Emissions Planning Approach:

With growth capped and development metered in the Tahoe Region, population growth within the Region is not anticipated to significantly increase its portion of GHG emissions.

This statement seems incorrect – tourism impact on residential property occupancy (“population equivalent”) is addressed particularly by STR growth which brings more vehicles and people to the area independent of “development growth caps/metered development” and the appendix includes some estimates of impacts. The

growth in tourism de facto adds significant population to the area – people and vehicles – adding to GHG emissions and other environmental pollution. In addition, the conclusions about actual pollutant data are confusing in that I have been unable to identify many permanent EPA certified sensors – where is the data obtained and how representative is it of “what actually is” around the lake?

I also question the VMT numbers reported in the plan document and have been unable to reconcile with the numbers in previous reports even considering methodology changes. Perhaps they, and the conclusions they drive, are all correct – however, this is another area where a data/methodology session to clarify tracking/results trajectory over time would be helpful. One very basic question: if VMT has increased from 1981, not great ... but what has been the trajectory curve over the last 5 and 10 years? i.e., did it improve and then worsen, and if so, have all contributing factors been fully considered and addressed?? Another: Shuttling day visitors from Reno for ELTT/Sand Harbor starting at Mt Rose Ski Area would result in a 3-4 fold greater reduction in total vehicle miles traveled > lower emissions in the Basin in addition to reduced impact on IV & Rte 28 parking/traffic! This concept is minimally considered with a bus service trial concept for Rte 431 but not at all that I see for Rte 50 access. And, though the concept of an intercept hub on Mt Rose is mentioned in one earlier TTD document, I have not seeing anything recently???

### **C. Transportation Demand Management**

The whole concept of an apparently significant transportation hub for Incline Village is most worrisome. The area is already congested and doesn't have sites/access comparable to the areas used in SLT or Tahoe City for larger transport hubs. There appear to be off-Basin transportation Hubs planned for the Truckee and Meyers area presumably to potentially capture some arriving vehicles for off-Basin parking when destination parking capacity is full. Yet I don't see such arrangements on the east side of the lake for traffic coming over Mt Rose Highway, Rte 50 or Kingsbury Grade?? These routes account for a significant % of arrivals and likely contribute significantly to the current Rte 28 challenges. There is mention of a planned bus service from Reno but no details which could help. However, careful detailed planning with local off-Basin “intercept lots/options” also should be considered and robust community input obtained.

Discover Tahoe section omits some of the most useful options used elsewhere, e.g.: No entry to area when legal parking in Basin full for cars headed to popular recreation sites with requirement to pre-book off Basin parking and shuttle as the only entry option. Need officers to move offenders along and block entry to area and address illegal parking with tow, boot and/or huge fines. Need off basin parking option with shuttles for day visitors. For example, on busy days, once legal parking at bus hub is full, stop all cars entering IV at rotaries on Rte 431/28 and Rte 50/28 > if they are going to Sand Harbor or ELTT, no entry unless they can show pre- paid bus pass with allocated parking spot once the venue legal parking lots have filled. Otherwise direct to off basin option. Actively patrol Rte 28 and tow/boot any illegally parked cars.

A plan is also needed for IV resident parking overflow, resident visitors and transient renters - there is likely a need for designated overflow resident/resident visitors/renter parking (cars, trucks, RV's, boats, etc) in or near IV in order to eliminate illegal and sometimes dangerous parking – was this considered?

**D. Protecting Natural Resources:** description raises an interesting thought: Should we be considering IV permanent residents an endangered species? The section states:

Protecting the environmental health of Lake Tahoe and the surrounding natural resources includes discouraging development in open space, flood zones, and natural habitats where rare, threatened, or endangered species live. This is a fundamental responsibility for TRPA and many of the Region's other public agencies.

**E. EIC:** Given that this is a multiple decade planning document, I was surprised with the report indicating that a simple checklist qualitative assessment was felt to be sufficient. Can we assume that there will be detailed environmental assessments of interventions as they are comprehensively planned, executed and monitored under the guidance of this broad planning document? Sadly the example which comes to mind for me is the lovely ELTT which I bicycled once when it first opened – truly beautiful .... However, the adverse impacts to date on the local community, the environment (including vehicle emissions and evacuation challenges) and unfortunately recently potentially on the visiting public during this admittedly unanticipated pandemic (with over-crowding, poor distancing/masking and some unsanitary situations) were not effectively anticipated and mitigated.

**Written Public Comment Draft TRPA Regional Transportation Plan (RTP)  
Submitted 10/25/2020 to TRPA Administration/Governing Board via Michelle Glickert**

My comments below are focused on Incline Village/Washoe County Tahoe Area. TRPA addresses a broader geography, yet there may be comparable questions and concerns elsewhere. I have previously provided public comment related to the RTP document and programs it describes at August and September, 2020 TRPA Governing Board and in separate emails to Ms Glickert/staff during October, 2020. I have also appreciated the opportunity to discuss my questions and concerns with Ms. Glickert and members of the involved TRPA staff team. In this process I have clarified several concerns and received answers to some specific questions.

From an over-arching perspective, my biggest concern regarding the Draft RTP is that, though I understand this is fundamentally a transportation plan, **I believe that there is a significant conceptual planning gap as follows:**

**Multiple inextricably interwoven elements impact transportation planning and associated environmental threats/mitigations including: Total Area Occupancy – Residents, Visitors, Vehicles – and Safe Area Capacity; Visitor types/ and their Usage & Travel Patterns; Parking, Traffic Patterns and Available/Projected Capacity; Transportation Options; and Evacuation Capability. And planning, including this Transportation Plan, must comprehensively consider and address the impacts, interactions and interfaces among these elements to deliver a sustainable, effective program.**

**At a minimum, the RTP document should recognize and mandate the need for comprehensive, integrated planning across all of the dimensions listed above.** However, unfortunately the current approaches to transportation planning, even in this extensive draft RTP, appear to share elements with the childhood arcade game of “whack-a-mole” - where as soon as one mole is put (“whacked”) into place, another pops up. So, for example, the RTP is developed to comprehensively address transportation but the issues of what to do about parking (resident and visitors) related to transportation initiatives are not comprehensively considered. History has shown us that the result is predictable > often the vehicles simply “pop up” in new, unacceptable, and sometimes dangerous spots!

**In addition, the following list represents specific, substantive concerns which I also plead with you to address within the RTP and going forward as implementation proceeds:**

**1. Formally address total area occupancy with limitations during busy seasons to ensure community safety and as you develop/review detailed TRPA/TTD Transportation proposals & consider revised WC proposed STR Regs & Tahoe Area Plan.** I have previously submitted data showing significant growth in the Washoe County Tahoe Area area occupancy related to growth in Short Term Rental volumes over the time period from approximately 2012 through 2019. I have attached examples below along with a new graph adding Washoe County RSCVA Vacation Rental data from 2019 and 2020 ytd.

During the listed time period resident occupancy has apparently tracked as noted in the draft RTP plan based on best currently available (census) data. In addition, the RTP includes a somewhat bluntly projected “guess-timate” of STR impacts. However, dramatic STR number and usage increases seen in 2019 and apparently maintained in 2020 despite transient drop-offs in late spring re Covid have not been considered. In addition, how comprehensively the usage rise from 2012-2018 was assessed is unclear. **At a minimum, the RTP should acknowledge this data and trends and commit to frequent (every 1-2 years) measurement and reassessment of actual area occupancy estimates/impacts with adjustment as indicated of projections and interventions.**

Even ignoring direct STR safety risks and neighborhood compatibility concerns (fires on decks, hot tubs over-heating, noise, trash, etc.), **STRs contribute to a significant seasonal occupancy increase in IV with dramatic impacts on population safety from traffic congestion, illegal and dangerous parking, beach/waterfront**



**over-crowding and inadequate evacuation capability.** I understand that there has been some thinking that in years past (pre-2010), overall Tahoe area occupancy was actually higher than is seen currently – however, I also understand that the **tourist demographic historically was apparently much different than today with higher concentration of casino/gaming tourists compared with the more recent shift toward recreation venue users. The resulting usage shift between these two groupings (“gamers” vs. “recreators”) has been palpably felt in day-to-day community life with different environmental/venue demands and stressors which should be explicitly considered in the RTP and future program development.**

**2. Sponsor comprehensive tourism management regulations (in addition to added STR Neighborhood Compatibility regs) to limit adverse area occupancy impacts. This includes addressing not only impacts of overnight visitors but also “day trippers” from outside of the Basin and from around the lake to various “tourist hot spots.”** In addition, as noted above, multiple dimensions must be considered and addressed simultaneously in order to achieve sustainable impacts – specifically in this case area occupancy, parking, traffic and transportation programs.

For example, Incline Village has inadequate local parking currently for resident/local business vehicles which clog local street-sides creating visibility, cross-walk safety and snow clearance challenges – this needs to be addressed before plans are made for how many/where added STR overnight and/or day visitor vehicles can be accommodated. STR visitors dramatically compound the parking situation which has been further multiplied in recent years with day visit influx for SLTT/Sand Harbor creating more risk. Even the well-intentioned Sand Harbor Express created issues with folks appearing to clog retail parking lots along Rte 28 to catch the buses. Despite efforts, failure to successfully manage traffic/parking on Rte 28 & nearby IV has worsened an already difficult situation. And there really is no clear plan for accompanying RVs, campers or boat, sea-doo, snowmobile trailers or business vehicles which need to be restricted throughout the village from on street parking and from all non-permitted, unsafe parking locations in residential areas.

I provided staff with an example of a comprehensive parking, traffic, transportation plan for a similarly located mountain/lake/tourist destination town Hallstatt, Austria (Addendum 2 below) which includes some added interesting concepts that could be extremely helpful if applied in Incline Village and possibly elsewhere in the Tahoe Basin.

**3. Do not assume as a “given’ but rather formally review and address current TTD proposals: In particular, the current TTD proposal for a transport hub at the old Incline Village Elementary School property has not been openly processed; appears based on flawed assumptions and incomplete site assessment; is actively opposed by many Incline Village residents as inappropriate for the site; and is being considered by an agency whose staff apparently failed to meet previous commitments re site contamination mitigation and permitting for a prior temporary use.** (See Addendum 3 below)

**It is my understanding that the RTP took this proposal as a “given” and I respectfully submit that instead a comprehensive review and planning process is indicated** – including careful planning re overall traffic, parking and transit needs for the community/visitors fitting size and impact of solution/solutions to the local environment. I respectfully suggest that the proposed site might be better used for overflow resident and some STR parking with perhaps a small transfer hub elsewhere along Rte 28 for commuters to/from Incline Village and locals wishing to visit the ELTT or Sand Harbor. And the RTP process should also consider a variety of intercept/transit options for out of Incline Village arrivals from different directions including multiple parking/shuttle options located outside of the village.

**I am also wondering about the recently news article re potential TDD managed vehicle fees which failed to address multiple components.** For example, were the reported fee plan to be enacted as described, where would occasional owner visitor vehicles or more critically the STR vehicle avalanche fit in the fee mix? Will the proposal sufficiently and effectively impact the current situation or make it worse?

**4. Please actively coordinate RTP and Area Occupancy controls with Evacuation Planning for the area: If a major wildfire erupts with urgent evacuation requirement, what is the potential public safety impact?**

Personally, I have spent >1 hr to go 3 mi. Kings Beach to IV. Others report similarly in feedback to WC recently re the STR Ordinance draft. Consider an evacuation situation – urgent exit required from Sand Harbor/ELTT area >> traffic jam of vehicles leaving those parking lots and nearby on street parking, plus bus loads of people to be moved to many, many vehicles parked at a transportation bus hub/other bus stops in Incline Village with connecting buses incoming .... And all this is occurring while residents, visitors in town, folks at local beaches are all trying to leave on a very few roads ...!!!

Please help your constituents & the tourism industry (which also won't benefit from a catastrophe) with responsible, data-based regs to manage area occupancy & tourists/vehicles to safe overall levels & safe performance attributes for everyone's benefit. Evacuation capacity was viewed as marginal several years ago & the situation is not likely to have improved. Tax revenue is nice & I think there may be lobbying by realtors, property managers, etc. with rationales I suspect mostly related to revenue. (Interestingly IV business owners that I have spoken to or heard second hand about haven't been as supportive.) Nonetheless, public safety has a value, & the existing and projected situation potentially places residents/visitors & thus WC & TRPA at ever increasing risk.

**5. Get On-going Public Input to proposals in open presentation/discussion meetings before formal hearings.** The recent webinar was a start, initial input was obtained previously, and the plan development process has been extensive, but no extensive open public discussion of the several current massive proposals has occurred via TRPA or WC. Interestingly the focused WC zoning changes for Emergency Communication Tower siting in remote areas and for abutting Industrial/Residential uses have had more public discussion than the sweeping implications of the massive zoning change embedded in the proposed STR regs or the substantive, potentially adverse Incline Village impacts of proposed Transportation plans/programs, particularly the apparently envisioned substantive IV “hub.”

**Please provide/facilitate/require at TRPA and of TRPA participating entities on-going comprehensive constituent input discussion opportunities.** Current proposals which appear based on “best available” but potentially incomplete data and/or possibly insufficient assessment of current reality can potentially lead to problematic conclusions. On-going updating and reassessment is indicated over time as data is refined, trends emerge and particularly as specific program proposals develop.

**6. Please review and consider the additional list of data concerns in Attachment 4 below including the specific concern that, for a 25 year planning document, a simple checklist environmental review with little actual listed data measurement seems completely inadequate.**

Thank you for your consideration, Carole Black, MD (retired), Incline Village resident

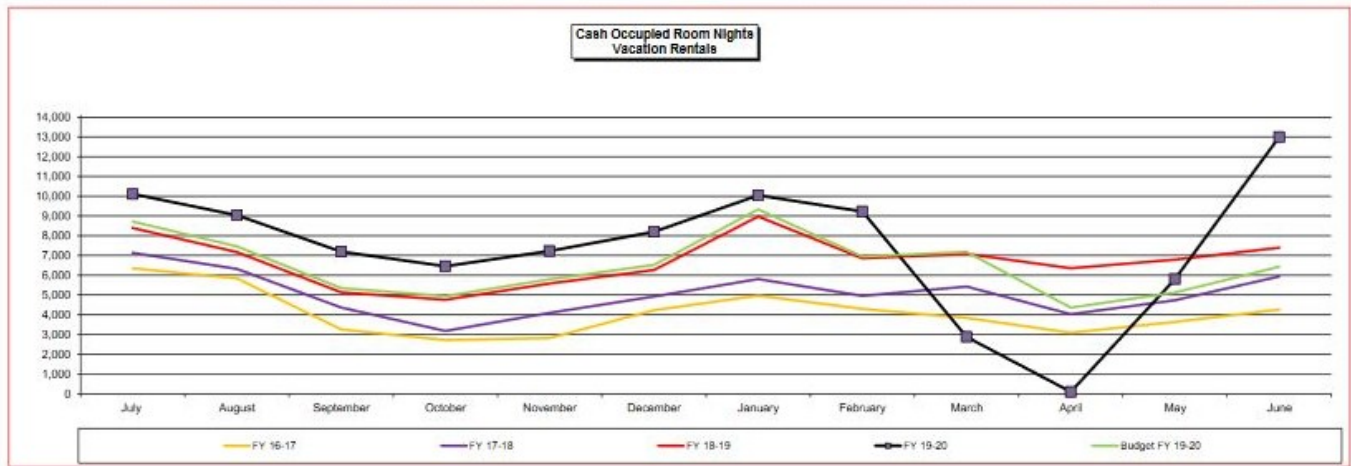
**Addendum 1: Examples of available occupancy data which apparently hasn't been comprehensively reflected in the RTP** (Please note that, with the exception of item 1a, all of the examples in this section were also submitted separately to Ms. Glickert):

**1a. Recent Washoe County RSCVA Vacation Rental Data:**

90% of Washoe county volume is Incline Village/Crystal Bay; see steady increase year over year and dramatic increases 2018 > 2019 and even 2019 >2020 (despite Covid impact) which is **not** included in RTP modeling.

Reno-Sparks Convention and Visitors Authority  
Cash Occupied Rooms-Vacation Rentals  
Trend

| Month     | Actual   |          |          |          |          |          | Budget   | Variance from Budget |         | Variance from FY 18-19 |         |        |
|-----------|----------|----------|----------|----------|----------|----------|----------|----------------------|---------|------------------------|---------|--------|
|           | FY 13-14 | FY 14-15 | FY 15-16 | FY 16-17 | FY 17-18 | FY 18-19 | FY 19-20 | Amount               | %       | Amount                 | %       |        |
| July      | 4,787    | 4,261    | 3,999    | 6,351    | 7,135    | 8,383    | 10,105   | 8,718                | 1,387   | 15.9%                  | 1,722   | 20.5%  |
| August    | 4,338    | 4,322    | 4,024    | 5,844    | 6,325    | 7,174    | 9,037    | 7,461                | 1,576   | 21.1%                  | 1,863   | 26.0%  |
| September | 1,311    | 992      | 1,418    | 3,257    | 4,365    | 5,141    | 7,197    | 5,347                | 1,850   | 34.6%                  | 2,056   | 40.0%  |
| October   | 427      | 467      | 530      | 2,720    | 3,181    | 4,781    | 6,455    | 4,951                | 1,504   | 30.4%                  | 1,694   | 35.6%  |
| November  | 406      | 401      | 613      | 2,824    | 4,093    | 5,578    | 7,227    | 5,901                | 1,426   | 24.6%                  | 1,649   | 29.6%  |
| December  | 1,643    | 1,770    | 1,885    | 4,236    | 4,929    | 6,266    | 8,202    | 6,517                | 1,685   | 25.9%                  | 1,936   | 30.9%  |
| January   | 1,113    | 1,301    | 1,522    | 4,969    | 5,803    | 8,972    | 10,040   | 9,331                | 709     | 7.6%                   | 1,068   | 11.9%  |
| February  | 935      | 1,100    | 1,812    | 4,304    | 4,960    | 6,861    | 9,223    | 6,946                | 2,277   | 32.8%                  | 2,362   | 34.4%  |
| March     | 512      | 465      | 2,632    | 3,839    | 5,431    | 7,086    | 2,881    | 7,187                | (4,306) | -59.9%                 | (4,205) | -59.3% |
| April     | 351      | 506      | 2,201    | 3,094    | 4,031    | 6,352    | 101      | 4,360                | (4,259) | -97.7%                 | (6,251) | -88.4% |
| May       | 625      | 498      | 3,288    | 3,641    | 4,734    | 6,795    | 5,803    | 5,120                | 683     | 13.3%                  | (992)   | -14.6% |
| June      | 1,332    | 1,429    | 4,477    | 6,268    | 5,944    | 7,396    | 12,996   | 6,429                | 6,567   | 102.1%                 | 5,600   | 75.7%  |
| Totals    | 17,780   | 17,512   | 28,401   | 49,347   | 60,931   | 80,765   | 89,267   | 78,168               | 11,099  | 14.2%                  | 8,502   | 10.5%  |



**1b. And Prior Incline Village STR Impact Estimates using RSCVA and IVGID data:**

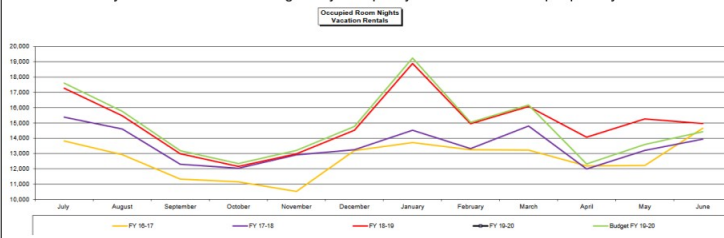
2012 – 2018 data:

Add in some early 2019 info:

**In IV, ~12% Rent Their Homes >>> Increased Area Occupancy: Avg 9%, Peak 17%**

RSCVA Occupied Room Nights for Vacation Rentals (VRs) Increased 61% over the 5yrs ending in FY 18-19\*; Approx. 90% of VR days are in IV/CB\*\*

- In FY 18-19 there were 179,589 VR occupied room nights, approximately 90% in IV/CB = 161,630 compared with 99,579 5 years earlier
- Average rental occupancy of 4.5, implies 279,230 added people days/year or increased average daily census by 745 people/day or about 9% average increase, more during peak periods:
- January 2014 vs 2019: the average daily occupancy increase was 1500 people/day or ~ 17%.



Sources: \*RSCVA Statistics Trend FY 10-11 through 2019; 2010 US Census; \*\*WC staff representations about % of Vrs in IV/CB vs WC total

**ZONING COLLATERAL DAMAGE: STR Area Occupancy Increase is a Major Risk & Requires a Long-Term Strategy**

STRs had already generated Added Area Occupancy in WC Tahoe Area:

- 750 People avg/day; 1500 People/peak day (4yrs)\*
- 188-300 Vehicles avg/day; 375-600 Vehicles/peak day\*\*
- > 200 Vehicle Trips/day almost every day; ~ 1200 Vehicle Trips/peak day^
- 116 Beach Visits/day; 94% Increase in July/Aug (3yrs)^

Summer 2019 vs 2018 brought Further Massive Occupancy Increase:

- 27,000 added Airbnb arrivals
- 23% additional increase RSCVA Vacation Rental Days

With new Ordinance/Zoning Changes STR numbers/density will likely continue to grow > Recommendations:

- Add STR Density and Intensity Restrictions - needed now!
- Urgent comprehensive STR impact assessment/plan with EIS is necessary
- Emergency services capacity and capability must be managed to match risk & area occupancy

Notes: Estimates derived from RSCVA & Census data, IVGID surveys & reports, WC staff, Airbnb press release; \* 2018 vs 2014; \*\* avg. 2.5 occupants/vehicle winter, 4/vehicle summer; ^ assumes 2 trips/vehicle/day; ^^ 2019 vs 2016

**1c: Analysis of some SLT data found on line:**

**Example I: South Lake Tahoe** > Is the growth in Hotel Room Rentals included in ‘Population’ for Transportation Plan projections – e.g., VMT trips, evacuation? Impact of SIR decrease from SIR ordinance change has not yet been fully realized yet increases in rentals are significant and well above earlier Plan predictions – each rental includes several people, likely > average resident occupancy of property (which might otherwise be vacant) and often >1 vehicle – has this increment been fully considered in addition to resident population in current projections?  
 (Data Source: online monthly SLT TOT reports)

**2a. Growth in SLT Hotel/Motel Room Occupancy:** In every month 2018-19 rooms rented were at least 17% higher in compared with 2012-13; only 3 months showed < 25% increase; the largest increase was > 90% with several months showing > 40% increase

**2b) SLT Vacation Home Rentals:** Detailed month by month TOT data is available on line. For purposes of this document, comparison was made between July, Dec 2012, July, Dec 2018 and July, Dec 2019:

|           | VHR Total Revenue & Estimated Rentals* |                     |  | VHR Subset Managed by Rental Agents: |        |                           |
|-----------|--|---------------------|--|--------------------------------------|--------|---------------------------|
|           | Total Revenue                          | % Change \$ vs 2012 | Est. % Change Total # Rented vs 2012** | Number Available                     | Rented | % Change # Rented vs 2012 |
| July 2012 | \$225,906                              |                     |  | 25854                                | 12088  |                           |
| July 2018 | \$474,963                              | 110%                |  | 29450                                | 18638  | 54%                       |
| July 2019 | \$416,794                              | 85%                 | 61%                                    | 27249                                | 16722  | 38%                       |
| Dec 2012  | \$305,160                              |                     |  | 25761                                | 6519   |                           |
| Dec 2018  | \$661,846                              | 117%                |  | 27993                                | 8851   | 36%                       |
| Dec 2019  | \$634,346                              | 108%                | 76%                                    | 27342                                | 9076   | 39%                       |

\* Sum of VHR by Rental Agents, Individual property owners and Shared VHR;  
 \*\* Pro-rated by % change in avg rental rate >> Avg Rental Rate for Rental Agent Managed increased: July 2012 = \$316 >> July 2019 = \$440; Dec 2012 = \$336 >> Dec 2019 = \$509.

**Addendum 2: Hallstatt Austria Example:**

Hallstatt, Austria is a small, hilly town, popular tourist destination on the shore of a lake with adjacent mountains so somewhat similar to Incline Village which has developed a comprehensive traffic, parking, transport approach. The area has put in place significant traffic, transportation and tourism management interventions to manage tourist volume and impacts. Some of the interventions are similar to those proposed for Tahoe in the RTP. However, some of the apparently more successful interventions used there are more comprehensive and utilize more intensive intervention coordinating parking, traffic and transportation approaches.

Some key components that I noticed include:

- No visitor vehicles or parking in the central area of town, only residents; and no traffic during daytime hours in some areas. Visitor parking/vehicle restrictions include overnight visitors (e.g., hotels/STRs) except for a few, very limited parking spots at certain hotels. Visitors park in lots on the outskirts with van shuttles for people and luggage. [I believe that the comparable section of Incline Village could be the currently designated Town Center and Tourist areas plus the entire Northwood/Southwood loop area, plus the congested sections between Rte 28 and the lake from the Rte 431 intersection to the southern edge of town.]
- Direct across the lake water shuttle to the town with timing linked to train arrivals from adjacent cities (Salzburg, Vienna) and parking at the water shuttle terminal across the lake
- Limited tourist shuttle/bus arrival parking slots and carefully staggered arrival times with booking, ticketing requirement
- It appears that RV type parking is limited to one camping area. I couldn't find anything about boats/boat trailers

Useful web sites:

<https://www.hallstatt.net/about-hallstatt/?source=nav>

<https://www.hallstatt.net/parking-in-hallstatt/?source=nav>

### **Addendum 3: List of some concerns re apparent TTD Property Purchase/Plan for Transport Hub in Incline Village**

- No direct access for buses from Rte 28; requires transit on small local, busy road with adjacent apartments/kids
- Site is apparently significantly contaminated – mentioned list includes asbestos and potential fuel contamination from nearby service station
- My opinion is that the site might be better used for resident/visitor overflow parking/STR parking (see Hallstat Austria example)
- Some have advocated for workforce housing and like this site near shops
- Nowhere in Incline Village is there enough space for a large transit hub like Tahoe City or SLT – planned size for this site is not clear
- Better (small) transit hub alternatives exist with other for sale property along Rte 28 and other sites for intercept lots for ELTT/Sand Harbor outside of Incline Village would be preferable
- Promised mitigation and permitting appears not to have occurred with prior temporary use
- Earthquake impact is reportedly visible on the property – may make parking structure/bus ramp construction concerning
- Buses may exceed allowable weight on adjacent residential streets

### **Addendum 4: Sample TRPA Data/Assumption Questions, Some Discussed with Staff in calls last week:**

**I. The RTP appears to approach modeling with significant reliance on serially building upon prior reviews with a relative dearth of actual data measurements/trends presented.** Unfortunately this type of approach can result in compounding of any prior inaccurate or erroneous assumptions/projections. I am particularly worried about listed "results" which are at variance with our actual on the ground experience. For example, using population estimates rather than total area occupancy in other projections (e.g., evacuation capability) without addressing tourism capacity management could significantly underestimate requirements and overestimate capability. Plans may thus insufficiently address actual root causes and therefore risk being

incomplete, misdirected and sometimes potentially dangerous. As an aside VMT projections are incorrectly represented as data in one table.

**II. The Transportation Volume Measurement model** aims to understand travel behavior patterns. This is a terrific concept and a foundation essential to future model development. There are, however some important questions:

I understand that every effort has been made to capture estimates for travel by residents and visitors. However, efforts are on-going to refine the models. What's missing? Including visitor trips is particularly important re the massive growth impact of STRs and the added day visitors to popular spots (e.g., ELTT). Interestingly the TRPA model, while including some factors related to STRs, does not seem to fully reflect the significant increases that have been felt in Incline Village, particularly in the last couple of years.

And the plan? While understanding that every trip won't be addressed, I do note some potential significant gaps:

Though the future "micro-transit" program may help, the majority of the Incline Village area isn't touched by other transit options and the transport service doesn't obviously reach entrance areas to several major stores. For example, an elderly resident needing groceries in winter from my condo using this program would need to drag a cart down a long driveway, across a busy road, and then up or down a hill on an often poorly plowed icy path to a bus stop, ride for a short distance, then drag cart up another hill, this time either along a road or through a busy parking lot to the grocery store. After shopping, then repeat this process in reverse with the added challenge of maneuvering a loaded, now heavy cart and needing to travel downhill on an icy surface to/from bus. Somehow, this sounds like a hip fracture or worse waiting to happen. If getting me and others like me to forego this short two-way car trip is a serious, safe goal, sponsoring a grocery delivery service might be a better plan!

Similarly, for most STR visitors/residents going to a playground or beach or library or hairdresser or post office or bank, this plan offers little or no service. There are also 2 "dead end" spurs which travel along residential streets, don't connect to any stores/businesses and ends in spots where there is no turnaround space for a bus – not clear what the plan for these is?? The map shading for ¼ mile to transit stops appears inaccurate at least currently; and for "old folks" ¼ mile on icy paths/streets in winter seems overly optimistic, potentially unsafe!

### **III. Examples of questions in other sections include:**

**A. Land Use and Transportation Connection:** Though the concept is mentioned, there is no adjustment that I can see for the use of residential properties as STRs, eroding actual residential availability. If properties are offered for rental an average of 50% of the year (and many are offered much more), then the equivalent of 500-1000/7000 residences evaporate as potentially available residences. Was this considered? The report mentions actual STR occupancy estimates (which seem low) but not "offered for rental" % ages.

The residential density map was confusing. My condo building and adjacent building alone have a total of 6 units and I don't think occupy an acre yet there this map appears yellow possibly reflecting incorrect density??

### **B. Greenhouse Gas Emissions Planning Approach:**

The summary statement in this section seems incorrect – tourism impact on residential property occupancy is driven particularly by STR growth which brings more vehicles and people to the area independent of "development growth caps/metered development." The growth in STR tourism de facto adds significant population to the area – people and vehicles – adding to GHG emissions and other environmental pollution.

I also question the VMT numbers reported in the plan document and have been unable to reconcile with the numbers in previous reports even considering methodology changes. One very basic question: if VMT has increased from 1981, not great ... but what has been the trajectory curve over the last 5 and 10 years? i.e., did it improve and then worsen, and if so, why?? How are alternative intervention proposals factored into VMT projections?

**C. Transportation Demand Management:** As noted above the whole concept of an apparently significant transportation hub for Incline Village is worrisome and alternative approaches are requested. Similarly the transportation plan creates parking considerations but a clear, comprehensive overall parking approach is lacking – is this planned as a next step?

**D. Protecting Natural Resources:** The description raises an interesting thought: Should we be considering IV permanent residents an endangered species in need of protection? I am reassured that there are apparently more air quality measuring sensors scattered around the lake than is apparent on public web sites (e.g. Airnow.gov) and that an effort is in process to make this data more contemporaneously available.

**E. EIC:** Given that this is a multiple decade planning document, I was surprised with the report indicating that a simple checklist qualitative assessment was felt to be sufficient. Actual study based on data collection and modeling is needed for such a complicated and long-range plan which should not rely on complex layering of estimates one upon the other which have not apparently been validated by recent available actual data as appears to be the situation in the RTP. Can we at least assume that there will be detailed environmental assessments of interventions with measurement/data as they are comprehensively planned, executed and monitored under the guidance of this broad planning document?

Sadly the example which comes to mind for me is the lovely ELTT which I bicycled once when it first opened – truly beautiful .... However, the adverse impacts to date on the local community, the environment (including vehicle emissions and evacuation challenges) and unfortunately recently potentially on the visiting public during this admittedly unanticipated pandemic (with over-crowding, poor distancing/masking and some unsanitary situations) were not effectively anticipated and mitigated.

## Public Comment RPIC 3.24.2021 Agenda Item Re TRPA RTP Goals and Policies

Submitted by Carole Black, Incline Village resident

The following comments are submitted as Public Comment based on review of RTP Goals and Policies. In general the themes focus on:

- Safety and neighborhood compatibility re transit in communities
- Balancing/optimizing Quality of Life in communities and neighborhoods with business objectives
- Maintaining flexibility in planned interventions, e.g., mobility hubs, to match the community situation
- Managing development to meet community/neighborhood needs within the context of preserving the environment
- Maximizing access to all potentially available recreational areas to distribute demand

1. RTP Projects diagram: Water Shuttle route did not match the diagram shown in APC Policies and Goals Presentation last week (copy attached at the end of this document). The service and stops shown in the latter diagram would provide a valuable service for the north shore and should be added to these sections and diagrams as well.

2. Goals: Suggest two edits:

- Safety > Goal: Increase safety and security for all users of Tahoe's transportation system **and maintain or enhance transit related safety elements in the communities served.**

- Economic vitality and Quality of Life > Goal: Support the **economic vitality success** of the Tahoe Region **to enabling economic vitality with** a diverse workforce; **a sustainable environment;** and **a quality experience for both residents and visitors.**

3. Policies: Suggest edits as follows:

- Policy 2.8 Ensure all transportation projects, programs, and policies meet the transportation needs and minimize negative impacts for **communities served and their residents including** disadvantaged communities and people with special needs

- Policy 2.22 Coordinate and include in area plans, intermodal transportation facilities ("Mobility Hubs") that serve major activity centers **in and outside of the basin connecting applicable transportation modalities including** transit, pedestrian/bicycle **trails/facilities, car/ride shares and, where appropriate and feasible, providing** park and ride facilities

- Policy 4.12 (also pg 297): Maintain monitoring programs for all modes that assess the effectiveness of the long-term implementation of local and regional mobility strategies on a publicly accessible reporting platform. **Require a congestion impact/management assessment and plan for all transit program proposals**

- Policy 5.1 Encourage community revitalization and transit-oriented development projects that comprehensively support regional and local transportation, housing, land use, environment, **neighborhood compatibility and other local priority community goals.** Note: significant concern re development proposals and how it will relate to Incline Village – maps seem to expose much of the Village to significant Town Center - like development which will be inconsistent with the area character

- Policy 5.2 (Policy Highlight Policy 5.2: Ensure access to public transit in



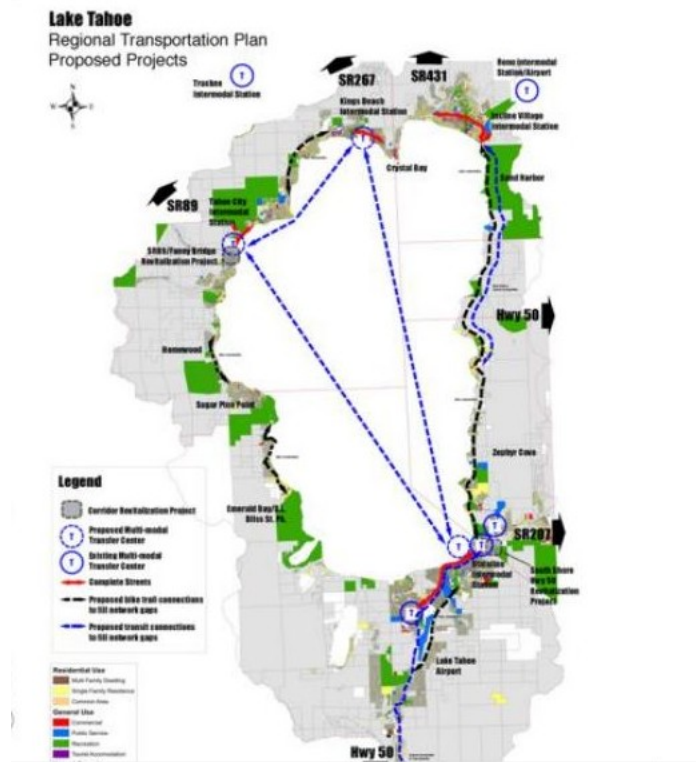
identified Community Priority Zones) and diagram showing transit service every 15 min 20 hr/day for the highlighted area in Incline Village. **Suggest adding wording to address residential neighborhood impact**, maybe something like “... matching type and size of vehicles used on local streets during off-hours (10 pm – 7am) to meet anticipated demand and to minimize adverse neighborhood intrusion”.

*Rationale: No concern about the overarching concept. However, the concern is the thought for practical implementation – the flagged area and adjacent small streets are very densely populated, narrow and congested. Currently TART buses wander through/near these areas which is already a challenge – extending service frequency and hours with these vehicles will potentially create a huge disturbance for all residents during what should be “calm, dark, peaceful & quiet hours”. See also modified wording recommended in Policy #2.8 above.*

Projects list:

- 03.02.01.0017 SR 28 Central Corridor Improvements – Sand Harbor to Spooner State Park; Est cost \$68M: **Recommend review of planned added parking to ensure maximal possible capacity is included**

Diagram referenced in item #1 from APC Policies and Goals Staff Report to TRPA APC 3.10.2021:



## Kira Smith

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**From:** Hancock, Ed@Waterboards <Ed.Hancock@waterboards.ca.gov>  
**Sent:** Friday, September 11, 2020 2:47 PM  
**To:** Michelle Glickert  
**Subject:** Meyers bus service in the Transportation Plan

Good afternoon,

I was reviewing the Regional Transportation Plan and I notice that a mobility hub is planned for Meyers, with a ~30 min bus service to town. Great! What I could not immediately see is the schedule for implementing such a service – perhaps you could help me answer that question? Apologies if that info is in the document, I did a quick skim and could not find it.

Kind regards,

-Ed

Ed Hancock, M.S.  
Environmental Scientist | Planning and Assessment Unit  
Lahontan Regional Water Quality Control Board  
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[Ed.Hancock@waterboards.ca.gov](mailto:Ed.Hancock@waterboards.ca.gov)



*“Water is a precious resource in California, and maintaining its quality is of the utmost importance to safeguard the health of the public and the environment.”*

TTD/TTC Hearing 10/9/20, staff notes.

Sue: high level plan, see in the long run, specific plans,

Lucia: a lot to be worked through, fed regs say it is ' reasonably foreseeable ' ; a lot more to do

Cody: look at 2045, 4% .... Really have to think about **rail** – how do projects get brought forward; doesn't show what you get

Andy: 2045 project horizon, Incline bike path moved up; uncertainty in federal funds – optimistic but not unreasonable

Clarifying questions now – Capital Corridor bus now with local transit, Cody; dif creative things could be done.

Tracking chat: Sondra - I think assuming a long term regional fund source in general terms for a long range plan is not quite the same as specific funding assumptions for a project. We are working on how to be as flexible as possible, but on the project basis there is a specific financial risk involved if the rest of the funding does not come to fruition.

11:01 AM: Sorry all - that was in response to a specific question from Carl and I meant to reply to him

**VISION – isn't quite there,**

**Data sources: lots out there**

**PUBLIC: none at this time**

**Steve T. – three things converging, reasonably expected funds, then reg rev**

**How long does it take to get there?**

**VMT and data and big business in data**

**3 – restructuring the plan, what is in – second part of the plan to get to day visitor**

**More revenue is needed to get to B, Analysis if we had an entry fee, how much could that reduce VMT and GHG – regional approach could be an entry fee**

**Day use – needs to be identified**

**Cody, gain the confidence of our community now, with our transit service**

**ONE TAHOE Item:**

**Revenue program should be more developed**



**Steve T – what we do need to is get to how the questions will be answered, each local jurisdiction gets with the RTP with these funds, infrastructure is critical too – no operations and maintenance facility**

**Bill: alignment and agreement is needed – we do need timelines, we have a year, we need to move forward**

**Cody: not ready**

**Sue: strongly before prez. Come to Co. , we need to know exactly where we can, cannot go.**

**Kyle: clear to me that there is NOT support right now, what is this going to be spent on, no trust for TTD – polling data sounds good but haven't seen it. Public support, political support is still needed, appropriate conversations – business groups, non profits. B4 legislature**

## Kira Smith

---

**From:** Devin Middlebrook  
**Sent:** Friday, September 11, 2020 3:40 PM  
**To:** ptodoroff1@sbcglobal.net  
**Cc:** Jeff Cowen; Michelle Glickert  
**Subject:** RE: Draft 2020 Regional Transportation Plan Available Now

Pete, you have valuable insights in the needs of Incline Village and we look forward to incorporating your input in a final version of the RTP. Emergency evacuation is a critical component of transportation planning and we will be sure to better highlight those aspects as we continue developing the plan.

Devin Middlebrook  
Sustainability Program Manager  
Long Range and Transportation Planning  
775-589-5230  
[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)



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**From:** Pete Todoroff <ptodoroff1@sbcglobal.net>  
**Sent:** Friday, September 11, 2020 3:28 PM  
**To:** Devin Middlebrook <dmiddlebrook@trpa.org>  
**Subject:** Re: Draft 2020 Regional Transportation Plan Available Now

That is Great. I guess this leaves TRPA off the Hook for some people but when it comes to SAFETY THAT IS MY PRIORITY PERIOD. !!!!!!!!!!!!!!! Pete Todoroff

iMac 2.5 GHz  
Pete Todoroff  
[ptodoroff1@sbcglobal.net](mailto:ptodoroff1@sbcglobal.net)

On Sep 11, 2020, at 3:25 PM, Devin Middlebrook <[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)> wrote:

Sorry Pete. I didn't think you were referring to the webinar.

During the webinar we received more questions than we had time for and multiple questions on the same topic that I summarized to get more questions answered in our short time period.

Devin Middlebrook  
Sustainability Program Manager

Long Range and Transportation Planning

775-589-5230

[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)



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**From:** Pete Todoroff <[ptodoroff1@sbcglobal.net](mailto:ptodoroff1@sbcglobal.net)>

**Sent:** Friday, September 11, 2020 3:23 PM

**To:** Devin Middlebrook <[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)>

**Subject:** Re: Draft 2020 Regional Transportation Plan Available Now

Mr. Middlebrook:

The last meeting I attended on line was put on by the TRPA and it was about Transportation. TTD has to go through the TRPA and that is the one I attended which was a waste of time because I didn't see any updates or my question about safety to the Community or Visitors evacuation plan from TRPA OR TDD. My question wasn't even announced. Pete Todoroff

iMac 2.5 GHz

Pete Todoroff

[ptodoroff1@sbcglobal.net](mailto:ptodoroff1@sbcglobal.net)

On Sep 11, 2020, at 3:15 PM, Devin Middlebrook <[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)> wrote:

Thank you for the email Pete.

At the last community meeting we heard a need for a transit route connecting to Reno over Mount Rose. TRPA and Washoe RTC partnered to make that happen and it is included in the plan.

For wildfire and evacuation, Tahoe Living With Fire is a great resource <https://www.tahoelivingwithfire.com/>. Evacuation planning and emergency response is at the forefront of everyone's minds right now.

On the TTD comment, I can't speak for them. Marsha Berkbigler is the Washoe County Representative on their board.

For TRPA Tim Callicrate is the Washoe County Lay Member on our Advisory Planning Commission.

Thank you,

Devin Middlebrook  
Sustainability Program Manager  
Long Range and Transportation Planning  
775-589-5230  
[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)



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**From:** Pete Todoroff <[ptodoroff1@sbcglobal.net](mailto:ptodoroff1@sbcglobal.net)>  
**Sent:** Friday, September 11, 2020 3:07 PM  
**To:** Devin Middlebrook <[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)>  
**Subject:** Re: Draft 2020 Regional Transportation Plan Available Now

Mr. Middlebrook:

The last time I attended you presentation it was a waste of time. I knew what you had to say in your presentation over 5 Years ago. There were NO UPDATES, NOTHING WAS SAID ABOUT EVACUATION IF THERE WAS A FIRE COMING FROM WEST SHORE. I WASN'T EVEN GIVEN THE OPPORTUNITY TO BE RECOGNIZED of my concerns about that subject. The very least you could of done was mention my concerns. TO ME THE MOST IMPORTANT THING A GOVERNMENT Agency is to PROTECT THEIR CITIZENS!!!!!!!!!!!!!! I did not hear anything about this today in this TTD Meeting. I would of thought that someone who is a Government Agency would of mentioned it but it did not happen. I was the only one and no one responded to my concerns. I feel that all of the people you have on what is going on with the TTD the Community that has a BIG IMPACT on their Community should have a say about what the TTD in their Community. Do you have anyone from Incline Village? Not that I am aware of. So if you think you really want to know what the Community of Incline Village and Crystal Bay that Community Needs to have a Representative or Representatives from Incline Village and Crystal Bay. Pete Todoroff

iMac 2.5 GHz  
Pete Todoroff  
[ptodoroff1@sbcglobal.net](mailto:ptodoroff1@sbcglobal.net)

On Sep 11, 2020, at 2:39 PM, Devin Middlebrook  
<[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)> wrote:

## Michelle Glickert

---

**From:** Michelle Glickert  
**Sent:** Wednesday, October 21, 2020 4:47 PM  
**To:** Andy Chapman  
**Subject:** FW: Andy Chapman Q - TTD Hearing Follow Up

Andy, my apologies for the incorrect link; our software developer made upgrades and all EIP #s changed, the timing couldn't be worse for us and others. Here you go, [03.02.02.0062](#).

Yes, the proposal for that segment is completely separated Class 1 bike path. It will be a challenging segment like Incline to Sand Harbor, but the goal will be to build a separated Class 1 path from Crystal Bay to Incline. Depending on issues with property acquisition, the path may need to be routed behind the homes through the forest, rather than along the lake. The language from page 59 of the plan refers primarily to proposals by Washoe County to expand bike and ped infrastructure within Incline Village.

Please let me know if you have any other questions,

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



---

**From:** Andy Chapman <[andy@gotahoe.com](mailto:andy@gotahoe.com)>  
**Sent:** Wednesday, October 21, 2020 1:54 PM  
**To:** Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)>  
**Subject:** RE: TTD Hearing Follow Up

Hi Michelle

The EIP number linked below goes to the Kahle Complete Street project. Can you send me the Crystal Bay to Incline Bikeway project link.

On page 59 of the plan there is this comment

*By 2035, bike lanes will be in place along the new Main Street in the South Lake Tahoe - Stateline corridor and Washoe County will significantly expand their on-street bike infrastructure with new bike lanes and bike routes in Incline Village*

Does this refer specifically to the CB to IV bike path? Do you know if the plan for that segment is a Class 1 or other class.

Thanks much

andy

---

**From:** Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)>  
**Sent:** Friday, October 09, 2020 1:34 PM



**To:** Andy Chapman <[andy@gotahoe.com](mailto:andy@gotahoe.com)>

**Subject:** TTD Hearing Follow Up

Andy, wanted to make sure I understand the comment received at the TTD Board hearing.

[03.01.02.0055](#) Nevada Stateline to Stateline Bikeway  
- Crystal Bay to Incline

Is this the correct project? If so, we do have it in the 2026-2035 bucket, I did however notice I have the wrong EIP number listed in the Draft. The project does not currently show any secured funding which is why it is in the midrange. It was a strong performer when it came to ridership, so rather than pushing out to 2036-2045, seeing it doesn't have funding right now, I did want to keep it in the mid-range. I hope that helps.

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



## Michelle Glickert

---

**From:** Michelle Glickert  
**Sent:** Monday, October 19, 2020 4:10 PM  
**To:** Jack Hubbard  
**Cc:** schmitz61@gmail.com; mberkbigler@washoecounty.us  
**Subject:** RE: Public Input on the Regional Transportation Plan

Thank you Jack for taking time to comment on the Regional Transportation Plan. Your comment will be noted in the comment log. All comments will be summarized and the formal log will be shared at future meetings. Please stay up to date with the plan at [trpa.org/rtp](http://trpa.org/rtp).

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



---

**From:** Jack Hubbard <jhubbard@pacbell.net>  
**Sent:** Monday, October 19, 2020 3:39 PM  
**To:** Michelle Glickert <mglickert@trpa.org>  
**Cc:** schmitz61@gmail.com; mberkbigler@washoecounty.us  
**Subject:** Public Input on the Regional Transportation Plan

Incline Village is a terrible idea for a transportation hub. The street is too narrow and frequented by small children playin

## Michelle Glickert

---

**From:** Michelle Glickert  
**Sent:** Wednesday, October 21, 2020 9:06 AM  
**To:** niobe.burden@gmail.com  
**Subject:** RE: RTP Input - Funding source

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Thank you for taking the time to share your thoughts on the RTP. I will save your comments to the record.

As for charging fees, that is absolutely in the RTP. We just completed a full plan for the [SR89 Corridor](#) that details how to better manage the corridor with paid parking and transit options.

State Parks does control collecting a fee at the park, that is not up to us however they were on the steering committee for the 89 Plan to ensure they had ample input and agreed with the recommendations for charging variable rates based on occupancy and consideration of a reservation system for Emerald Bay. The plan is for the entire Tahoe region which means it includes everything from regulatory items like airports to how we want to manage daily commuters and our recreations sites, making it challenging to find everything.

Thanks again,

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



---

**From:** Niobe Burden Austere <niobe.burden@gmail.com>  
**Sent:** Wednesday, October 21, 2020 5:10 AM  
**To:** Michelle Glickert <mglickert@trpa.org>  
**Subject:** RTP Input - Funding source

Great Plan but Need to Identify Funding sources - " shortfall of approximately \$1 billion to fully fund the plan. With time, strategies will be identified to close the funding shortfall. "

Isn't this always the case? The one **key funding stream** that doesn't seem to be identified anywhere is the ability to charge an **entrance fee to Emerald Bay**. Why is this??

Living in Europe and having lived and traveled in a multitude of places (including resort communities) throughout the world....it baffles me that Emerald Bay "**one of the most beautiful destinations in the world**" as quoted in the TRPA

Draft report, **free for all to come and go as they please** without any regard for supporting the build and maintain necessary infrastructure for it to be available to the public.

What other iconic tourist attraction is totally free for all? **The income stream collected from visitation could not only be a viable sustainable source of funds but also sustainable directly related to usage on a maintenance point.**

I really would like to know the reasoning **why this is not a viable consideration** ?

Is it that it is a multiple jurisdiction issue?

California State Parks?

Is it a California Highway issue - apparently an archaic thinking agency to deal with?

**Fund the Vision.** *These fees can also be one sustainable funding source to build, operate, maintain, and renew the transportation system as well as fund parking management and enforcement. A \$15-20 fee per vehicle by reservation system isn't unreasonable for entering a gem of a sight as Emerald Bay is. **Public entrance fees for entering high usage areas in most of Europe range between 10€ and 30€ per person and include the public transport.***

If TRPA can take the lead and put this great transportation plan together across so many agencies, why can't this very vital issue be addressed with the same fortitude?

***Other Corridor wide Tools and Strategies in the study met and simplified***

- Leverage paid parking to fund transit and the operations and maintenance of new trail and parking facilities
- Utilize strategies such as reservations, congestion-based pricing, time limits, & progressive pricing - ***seems complicated??***

**\* Create a sense of entry to the corridor - *with an entry gate where reservation confirmed and entry granted during high season***

A suggested Mobile app developer for parking reservation system -

<https://bluestoneapps.com/>

I hope this is helpful. Thanks for your consideration and I would really value a response if possible.

*Niobe Burden Austere*

-----  
*Homeowner in Tahoe community*

*Fine Art Photographer - Instructor*

*Former board member TCDA*

*Committed to contributing from afar with ideas from other resort communities worldwide*

*Instagram: @niobesphotos*

*+33 662094968*

## Michelle Glickert

---

**From:** Michelle Glickert  
**Sent:** Wednesday, October 21, 2020 9:14 AM  
**To:** niobe.burden@gmail.com  
**Subject:** RE: RTP Input - Completion of the Tahoe Trail along west shore

Thanks again Niobe for providing valued feedback on the plan. You will be interested to know that we are kicking off an update to the Active Transportation Plan early next year. This is where you can find those fine details about trails widths and approach to managing demand. For the first time we will also be including dirt paths to ensure we can connect our other bikeway networks and transit to these places. Please if you have not already sign up for our e-news so you can stay up to date on this plan as well as other transportation projects including transportation funding. On the [RTP site](#) under "Get Involved" at the bottom of the page is the sign up link.

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



---

**From:** Niobe Burden Austere <niobe.burden@gmail.com>  
**Sent:** Wednesday, October 21, 2020 5:10 AM  
**To:** Michelle Glickert <mglickert@trpa.org>  
**Subject:** RTP Input - Completion of the Tahoe Trail along west shore

Completion of the Tahoe Trail along West shore

"Overall, participants expressed support for a more car-free experience for recreation access and desire for completion of the Tahoe Trail."

**\* Create a separated, shared use path to promote active transportation**

**\* Encourage active transportation**

*\*\* Note this path will also become very busy, as it already is in areas such as the bike bath between Squaw and Tahoe City and on the East shore between Incline and Sand Harbor as I'm sure it must be in south shore as well? Consult with Tahoe Bicycle Coalition*

***Those areas of the trail which may become congested with bikes and pedestrians need to be identified NOW for planning and construction and two separate paths should be considered - one for bicyclists (each direction) and the other a footpath. If one of the main objectives is to promote active transport, then future increased usage issues***

***should be planned for to avoid obvious growth issues.*** Perhaps they are the same areas already identified for the Recreation Zone Speed Limit During Peak Season

- Provide a coordinated transit system that includes both regional and corridor park once strategies.
  - Plan for emerging e-bike technology and shared mobility services.
- \*\* At Transit Center (north and south lake) - provide free parking IF public transit system is used, develop concessionaires providing bike and e-bike rentals**

*Where I have lived in Europe, bike lanes have been made a priority and in Munich, for instance, people ride to work on even in winter before considering gridlock auto traffic through the city. It's made convenient for them, pedestrians have a separate lane - and it is safe! Car lanes have been overtaken by wider bike lanes. Granted, road edges are much narrower here in Europe than in the US....road shoulders are pretty much non existent.*

Hope some of these ideas help. Thanks for the consideration

## *Niobe Burden Austere*

-----  
*Homeowner in Tahoe community*

*Fine Art Photographer - Instructor*

*Former board member TCDA*

*Committed to contributing from afar with ideas from other resort communities worldwide*

*Instagram: @niobesphotos*

*+33 662094968*

## Kira Smith

---

**From:** rondatycer@aol.com  
**Sent:** Sunday, October 25, 2020 4:24 PM  
**To:** Michelle Glickert  
**Cc:** lisa.krasner@asm.state.nv.us; ben.kieckhefer@sen.state.nv.us  
**Subject:** Tahoe Transportation Solutions Should Not Become Incline's Problems  
**Attachments:** 2007VisionSummaryFinalReport.pdf; CornerProperty.pdf

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

Dear Michelle,

We Incline Village residents understand that TRPA Regional Transportation Seminar spokespeople Melanie Sloan and Sara Schmidt were unable to address Incline's most important transportation concern during your recent webinar because "Specific projects aren't part of the Plan." However, we are hopeful you will forward all our correspondence to whoever at TRPA will be responsible for giving approval to Tahoe Transportation District's plans to build a bus hub at the Old Incline Elementary School property (OES).

### **PROBLEMS WITH LOCATING A HUB AT THE SCHOOL PROPERTY**

For years we citizens have expressed our concerns about TTD's use of the OES property as a bus hub and suggested numerous other locations (see attached), TRPA already knows the reasons Incline residents are against the hub in that location.

1. The hub will snarl traffic even while it's being built. Buses/trolleys will—as in the past—create traffic jams on our main thoroughfare of Southwood Boulevard.
2. The hub will bring more tourists to central Incline. The town is already suffering from overtourism. Until TRPA and TTD limit the number of cars in the Basin, tourists will continue to drive to and park in Incline Village to access all East Shore recreation attractions. Bikers will not bike to Spooner, ride a bus, and get off in Incline to ride to the Flume Trail, the East Shore Path, the Tahoe Rim Trail or the Tyrolean trail. They will bring their bikes on their cars and park near the bike trails.
3. It will increase parking problems throughout Incline neighborhoods. As seen before, "build it and they will come." The East Shore Path is full by 8am and tourist cars park throughout Incline's residential areas, especially in the Mill Creek area. Once the new bus hub parking lot is full, parking will overflow into other neighborhoods. Incline has one of the most severe parking problems around the lake because of our narrow sloped streets.
4. The hope for a Village Center comprising the OES property will be dashed. Incline will forever remain a town without a center.

### **PUBLIC SUPPORT IS AT STAKE**

Your mandate for public support is repeated throughout your publications:

"No transportation plan, regardless of how well conceived, can be successfully implemented without broad public support. **Public support will be crucial** to provide the financial resources necessary for implementation, as well as enactment of critical legislative and regulatory tools."

"The TMPO's public participation process aims to give the public ample opportunities for early, meaningful, and continued involvement. Collecting diverse public input is important for determining **the types of projects that meet public desire**, and ensures that public funds are directed to the areas of highest need. Transparency increases levels of participation, ensuring well-prepared and publicly supported planning documents."

p. 10 - Stakeholder Meetings –

p. 11 - "The only meeting involving Incline Village and Crystal Bay is an "Ad Hoc" IVCB Visitors Bureau Meeting." [FYI - The IVCB Visitor's Bureau is a Washoe County tourist facility located in Incline. It does not in any way represent Incline Village residents.]

"Description: There is broad consensus that the Tahoe Region needs a transportation system transformation. Improvements are needed to help people travel to, from, and around the Region more efficiently. But they are also needed to strengthen initiatives underway to conserve and restore Tahoe's environment; **revitalize communities;**

**improve quality of life for residents** and quality of experience for visitors; improve mobility and safety for people walking and biking; improve recreation access and sustainability; and reduce emissions of greenhouse gases and build a resilient system in response to climate change."

I believe I can speak for most of our residents when I say this project will never have "broad public support." If such support is a criterion for consideration of project approval, TRPA should never approve this project. The project directly conflicts with the goals set out in Incline's community vision seminars and resulting publications of 2007 and 2012 (see attached), and it still conflicts with our vision of a town center today. We have no other place for a center. It will in no way improve—and will in fact deteriorate—the quality of life of Incline residents.

This project will, in fact, be one more example we cite when we request our legislators to permit Incline Village to become our own township so we can control what happens in our town. Washoe County, TTD, and TRPA continue to use our village for their own purposes no matter what Incline Village residents want. We do not elect anyone at TTD or TRPA, and we're a minority 20% of Washoe's District One, which elects 1 member on a 5-member commission. Basically, we have government regulation without representation. People who do not live here and whom we do not elect govern us, and we have no influence over their decisions.

If TRPA wants Incline Village residents' future support, it must act in our best interests, not at our expense. TTD's contention that Incline's reaction to the proposed bus hub "is mixed" is patently false. TRPA must understand we residents are united against this project. We will heartily support a mobility hub in a different Incline location to satisfy TRPA's and TTD's mandates.

Sincerely,

Ronda Tycer  
Incline Village Resident of 29 years

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## Devin Middlebrook

---

**From:** Chris McNamara <chrismcn7@gmail.com>  
**Sent:** Saturday, September 12, 2020 8:50 AM  
**To:** Devin Middlebrook  
**Subject:** Re: Draft 2020 Regional Transportation Plan Available Now

- Trails: Increasing trips by foot and bike by providing walking and biking routes.

love it!!

- Chris McNamara

On Fri, Sep 11, 2020 at 2:39 PM Devin Middlebrook <[dmiddlebrook@trpa.org](mailto:dmiddlebrook@trpa.org)> wrote:

[View this email in your browser](#)



## Linking Tahoe: Draft Regional Transportation Plan Update Released

The Regional Transportation Plan will improve water quality, air quality, scenic resources, noise levels, and recreation resources across the Tahoe Region. According to TRPA, Tahoe's transportation system should meet the daily needs of transit-dependent riders and employees, make it easier for recreational travelers to use transit, and assure visitors they can get around without their cars.

## Michelle Glickert

---

**From:** kathie julian <kathiejulian@gmail.com>  
**Sent:** Monday, October 12, 2020 10:18 AM  
**To:** Michelle Glickert  
**Subject:** Comment from Incline Village Resident on use of IES for Transport Hub

Hi Michelle

I am writing to express my opposition to the use of this site, the old Incline Elementary School (IES), as a transport hub.

This would be a poor location for a number of reasons. Fundamentally, it does not serve the purposes of our broader community. It appears to be a larger part of regional tourist infrastructure that would be more appropriately sited along Hwy 28. The project appears to serve tourism to Lake Tahoe, not the people who live, work and vote here.

The proposed location is in an extremely congested area as is as it is a main access point from Hwy 28 to our Post Office, small commercial complex, and apartments where many of our lower income/immigrant families reside. There is a lot of foot traffic between 786 Southwood apartments and the small commercial area that houses two "Tiendas" and two thrift shops, among others. The bus hub would adversely impact this already challenged community of workers, so necessary for Incline Village. There is also considerable on street parking along Southwood across from the old IES, and this community of workers needs that parking. During the winter, issues of congestion worsen as the road becomes narrower with snow. The street is sloped, so icy conditions are also an issue in the winter.

This site would be more appropriately used for workforce housing (with parking) and some green space for the immediate community families.

Please consider to put this transport hub at another location—perhaps further down Hwy 28 closer to Sand Harbor or by the round about where the Sheriff's Dept has a facility.

Thanks

Kathie M. Julian  
PO Box 5477  
Incline Village, NV 89450  
Cell: 1 (415) 646 5413  
E-mail: kathiejulian@gmail.com



Tahoe Regional Planning Agency  
PO Box 5310  
Stateline, NV 89449

October 21, 2020

**Subject: Draft 2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy**

Dear Ms. Cremeen:

The Friends of the West Shore appreciates this opportunity to provide comments on the draft **2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy** (RTP). The Friends of the West Shore (FOWS) works toward the preservation, protection, and conservation of the West Shore, our watersheds, wildlife, and rural quality of life, for today and future generations. FOWS represents community interests from Emerald Bay to Tahoe City.

FOWS believes the RTP contains many projects and plans that have the potential to provide transportation benefits, if funded and implemented appropriately, however we are extremely concerned with many elements of the plan and associated environmental documentation. Our detailed comments are attached, however concerns include:

- The RTP does not meet the existing capacity-based TRPA standard for VMT.
  - o In fact, the RTP relies on the adoption of a new VMT standard that focuses only on GHG-based per-capita *literally minutes before* the adoption of the RTP in order to remedy this.
- The proposed GHG-based VMT standard would allow traffic in the Basin to increase *without any capacity limits*.
  - o Uncapped VMT growth would result in negative impacts to other thresholds, including water quality.
  - o Uncapped VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation).
- The RTP does not adequately address traffic associated with visitors, especially day-only visitors.
- The RTP fails to identify adequate funding and continues to place the heaviest burden on residents despite the greatest impacts coming from visitors.
- The environmental checklist fails to incorporate new significant information, as required by CEQA.
- It is unclear how standards of significance are being judged for VMT impacts.
- Use of “Annual Averages” fails to account for significant impacts of traffic during peak periods, resulting in potentially fatal consequences associated with emergency evacuation and access.

We are also concerned with the lack of adequate public disclosure regarding the significance of the proposal to remove the existing “absolute” VMT standard, which places a maximum cap on total daily VMT, with a standard that includes no such limit. This is a significant change affecting the environment, public health and safety, and reflecting a major shift in how TRPA views its responsibilities. As noted in our 8/27/2020 comments to the Tahoe Transportation Advisory Committee (TTAC), elimination of the capacity-based VMT standard runs contrary to the TRPA Compact’s directive that TRPA establish environmental threshold *carrying capacities* for the basin. The ongoing trend to move away from

regional, Tahoe-specific regulation to relying on local and state regulations that are not tailored to Tahoe's unique conditions flies in the face of the very reason the TRPA was created. These larger issues have not been disclosed nor discussed in the many public webinars/workshops, committee meetings, APC and GB hearings, and so on, and often are only talked about when members of the public raise questions (even then, these issues are given little 'air time' or not answered directly, as occurred during the recent 10/12/2020 webinar).

We also find it discouraging that significant efforts have been put into emphasizing collaboration with public stakeholders regarding the VMT standard update, while at the same time, TRPA is already planning to adopt the staff-recommended GHG-based VMT standard and eliminate the existing "absolute"/capacity-based VMT standard at the December 2020 GB hearing, as noted in the Initial Environmental Checklist. This sends a message to stakeholders that TRPA's decision has already been made, creating a disincentive for stakeholders to continue to put significant time and energy into participating in these "collaborative" discussions.

**We recommend against adoption of the proposed 2020 RTP until and unless these issues have been addressed. We also request TRPA clearly disclose the significance of the proposed changes to VMT, the relationship to the proposed 2020 RTP, and to engage stakeholders and decision-makers in a transparent discussion of the agency's role and what these changes will mean.**

Please feel free to contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) if you have any questions about these comments.

Sincerely,



Judith Tornese,  
*President*

## Contents

|  |    |
|--|----|
| Existing capacity-based VMT standard and TRPA’s Role ..... | 3  |
| Day-visitor impacts .....                                  | 4  |
| Proposed VMT standard allows uncapped VMT growth .....     | 5  |
| Uncapped VMT growth: Other Environmental Impacts .....     | 5  |
| Uncapped VMT growth: Public Health and Safety .....        | 6  |
| Inadequate funding sources:.....                           | 7  |
| Failure to consider new relevant information in IEC:.....  | 8  |
| Peak visitation and “Annual Averages”: .....               | 9  |
| Impacts to beneficial redevelopment projects: .....        | 10 |

## Existing capacity-based VMT standard and TRPA’s Role

As noted in our attached 8/27/2020 comments to the Transportation Technical Advisory Committee (TTAC), FOWS is extremely concerned with the proposal to eliminate the existing capacity-based or “absolute” regional VMT standard. Further, while we appreciate the extensive work of staff and other stakeholders with regards to the TTAC, the last two meetings have barely addressed this issue. References to “regional VMT” have generally been related to whether to include all regional *per-capita* VMT in the baseline and targets for the new GHG-based standard. The response to our 8/27 comments appeared to be a brief acknowledgement that the TTAC was not the appropriate venue to discuss TRPA’s role, yet there was no acknowledgement of how the elimination of the absolute VMT standard conflicts with the agency’s Compact-mandated role.

At the same time, the Initial Study/Initial Environmental Checklist (IS/IEC) for the 2020 RTP has already assumed the absolute VMT standard will be eliminated – literally minutes before the 2020 RTP is considered for adoption. In fact, the TRPA would not be able to make the findings necessary to adopt the RTP *unless* it eliminates the existing absolute VMT standard because current absolute VMT violates the existing standard and the 2020 RTP will increase absolute VMT:

“The threshold standard established a VMT target in the Plan Area of 10 percent less than 1981 VMT levels. TRPA currently estimates this to be a daily VMT for the modelled day below 1,298,987. The existing (2018) VMT in the Plan Area for the modelled day is 1,393,994, exceeding the VMT threshold by 95,007 miles travelled. As discussed below, VMT in the Plan Area will continue to exceed the 1981 threshold but will increase only 1.2 percent by 2045 over current levels. Because the 1982 nitrate objectives of the standard have not only been accomplished but also radically exceeded and the principal drivers of absolute VMT growth are outside TRPA’s effective control, TRPA has commenced a process to update the VMT threshold. The update will align the standard with current concerns including GHG reduction, increased mobility, and reduced reliance on the automobile. Under direction of the Regional Plan Implementation Committee, TRPA is developing a metric promoting VMT reduction per capita to meet the GHG objectives of both California and Nevada that will also increase mobility options and decrease reliance on autos. TRPA anticipates updating the VMT threshold at the same meeting it adopts the 2020 RTP/SCS. Nevertheless, this document analyzes any VMT related impacts as set forth in TRPA’s 2019 Interim Guidance for assessing the impact of development projects and plans. Under the Interim Guidance, a project or plan would not cause a significant impact if the

action does not produce any unmitigated VMT. VMT was evaluated for the 2020 RTP/SCS as included in the methods and guidance for assessing VMT for residents, employees, and visitors (Appendix G).” (IEC, p. 197) [Emphasis added]

This approach to adoption of the 2020 RTP also raises legal and public policy questions. TRPA has prepared an environmental review document that clearly states a plan does not meet the existing TRPA standards but prefaces a Mitigated Finding of No Significant Effect on a new future VMT standard. The document has been circulated for public review with this disparity. It is also unclear how standards of significance are being judged for VMT impacts. Further, as it appears impacts are not being judged based on the existing TRPA VMT threshold (a capacity-based standard), adequate mitigation for the increases in “absolute” VMT have not been analyzed.

In addition, the lack of public disclosure regarding what this means, as noted previously, is concerning. We have seen no clear attempt to reach out to the general public regarding the proposal to eliminate a VMT standard which places a regional cap on VMT and replace it with one which does not, and as mentioned, very little discussion with the TTAC.

## Day-visitor impacts

The RTP does not adequately address traffic associated with day-only visitors (e.g. those who drive into the Basin and drive back out on the same day), although they make up a significant amount of the visitor impacts.

“Consistent with the AirSage analysis, the findings of the North Lake Tahoe Resort Association (NLTRA) visitation study estimated that 42% of visitors to the region were day visitors (NLTRA 2018). Importantly, this does not mean that on an individual day that 42% of visitors in the region are day trippers (DRA 2017). The report also calculated the total number of visitor days, defined as, “The total number of days of all adult visitors who stayed in the North Lake Tahoe Area during the calendar year.” When looking at total visitor days, the report found only 14% of visitors days were day visitors (DRA 2017). The 14% of all visitor days is also consistent with the AirSage data presented in Corridor Connection Plan, which suggested that day visitors were responsible for about 15% of all visitor days in the Region.” (TTAC 10/5 packet, p. 245). [Emphasis added]

This statement appears to minimize the VMT impacts of day-only visitors by aggregating them as relative to total “visitor days.” According to the RTP, the average daily VMT a visitor drives is 7.9 VMT/day per day.<sup>1</sup> This appears to be based on an average of ‘all’ visitors, including those who stay in the basin overnight (and therefore are more likely to park once and drive less while here). However, day-only visitors generate substantial VMT driving in/out and around the Basin in just one day; 7.9 VMT/day is far less than the in-Basin distance that would be driven from most basin entry points to typical destinations around the Basin. Therefore, treating the VMT impacts of day-only visitors based on their proportion of visitor days or applying the ‘average’ daily VMT from this aggregated group of “total visitors” is comparing apples to oranges.

The RTP also suggests that if day visitors increased by 10%, there would be a 1.8% increase in regional VMT.<sup>2</sup> However, this is based on the 7.9 VMT/day average of all visitors, and does not account for the longer distances traveled in one day by day-only visitors. If overnight visitor populations remained the

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<sup>1</sup> RTP, p. 245

<sup>2</sup> RTP, p. 245

same, but day-visitor populations increased, the increase in VMT would not be linear as the RTP suggests.

The overall fact is that 42% of the visitors to the North Tahoe region were day-only visitors. This impact is not reflected by the RTP, nor do the RTP programs illustrate how the impacts of day-only visitors will be adequately reduced. Contrary to TRPA's belief that the agency has no ability to control visitor traffic,<sup>3</sup> we believe there are measures available that can be employed to further disincentivize passenger vehicle travel into the basin (especially day-only use) and to provide adequate funding for necessary transportation projects and transit, including but not limited to a basin entry fee (if developed and implemented appropriately and fairly), Congestion-Management Pricing<sup>4</sup>, and significant improvements in transit access to recreation in the Basin. This would also allow roadways users to pay their fair share toward mitigating vehicle impacts in the Basin, a burden which is now borne primarily by the basin's 55,000 residents (see additional discussion of funding below).

### **Proposed VMT standard allows uncapped VMT growth**

The proposed GHG-based VMT standard would allow traffic in the Basin to increase *without any capacity limits*. For example, even if the per-capita VMT reductions were achieved by reducing the distance driven by each driver, the total number of vehicles driving in the basin could increase, resulting in a net increase in absolute VMT, congestion issues, and the associated environmental and public health and safety impacts that increase.

While we support the adoption of a GHG-based metric, this should be *in addition to, not in lieu of*, a capacity-based standard. Further, if there is no maximum capacity on VMT in the region, then there will be little political will to address absolute VMT – a fact already evident by the statements made by the agency in the 8/27/2020 TTAC packet.<sup>5</sup>

### **Uncapped VMT growth: Other Environmental Impacts**

#### **Water Quality:**

We understand the original absolute VMT standard was based primarily on reducing NOx emissions, which have significantly declined due to improvements in technology. However, VMT also results in other environmental impacts, including water quality and clarity and noise:

#### **“Water Quality**

Policies and strategies to support attainment of water quality thresholds that are relevant to the SR 89 Corridor include the following:

Reducing private automobile use through improvements to public transit and alternative transportation modes with the goal of reducing air pollution and the subsequent deposition of nitrogen and fine sediment.

Ongoing allocation of water quality mitigation funds to support erosion control and stormwater pollution control projects.

Ensuring road conditions are consistent with the road operations plan and road operations scenarios for reduction of pollutants.” (SR 89 Corridor Management Plan; Appendices, p. 109). [Emphasis added]

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<sup>3</sup> See 8/27/2020 FOWS comments to TTAC.

<sup>4</sup> Seattle Congestion Pricing Study. Phase 1 Summary Report. Seattle Department of Transportation. May 2019.

<sup>5</sup> See attached FOWS comment letter dated 8/27/2020.

It does not make sense to spend over a billion dollars to improve water quality, only to then allow uncapped growth of VMT, thereby creating additional water pollution. While the Tahoe Maximum Daily Load (TMDL) program will help to reduce pollutant loading from roadways, it cannot not eliminate 100% of the pollution associated with VMT (including resuspended roadway dust, particulates from wear and tear of vehicles and asphalt,<sup>6</sup> etc.). Further, even if the NOx from vehicles contributed minimal nitrogen loading to the lake, the particulate pollution remains a factor.

**Noise:**

Vehicle use is one of the predominant noise sources in the basin.

**“Noise**

Vehicular travel is one of the predominant noise sources in the basin...Reducing private automobile use and improving public transit and access to bike trails will further reduce noise impacts from personal vehicles.” (SR 89 Corridor Management Plan; Appendices, p. 109). [Emphasis added]

A net increase in overall absolute VMT will increase vehicle-related noise. The impacts of VMT on TRPA’s noise thresholds are also neglected by a per-capita VMT standard that would allow for uncapped increases in absolute VMT.

**Uncapped VMT growth: Public Health and Safety**

The elimination of a maximum VMT capacity-based standard also poses threats to public health and safety in multiple ways, which runs contrary to mandates of the TRPA Compact to adopt environmental threshold carrying capacities **“that maintain public health and safety within the region.”**<sup>7</sup>

**Emergency Evacuations:**

More vehicles on the roadway will create problems for emergency evacuations. The likelihood of catastrophic wildfires increases each year as the impacts of climate change and unhealthy forests result in more wildfire events. As was unfortunately seen with the Camp Fire in Paradise, CA in 2018, even roadways that aren’t already full of vehicles will quickly become gridlocked, preventing evacuations and subjecting people to the threat of dying in a wildfire they can’t outrun. In the Basin, roadways are often already at capacity, especially during peak days. If a wildfire were to break out, especially during these times, there is a significant threat to the lives of residents and visitors in the Basin. Uncontrolled absolute VMT growth will only make matters worse at a time when TRPA should be focusing on how to address existing traffic levels. In addition, relying on local jurisdictions to address a situation that crosses multiple jurisdictional boundaries, as suggested in the IEC,<sup>8</sup> is not sufficient *regional* land use planning.

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<sup>6</sup> E.g. Hyun-Min Hwang, Matthew Fiala, Russell Wigart, Raph Townsend, and Veronica Edirveerasingam. Sources of fine sediment particles (< 20 µm) in roadway runoff in the Lake Tahoe Basin. Prepared for Pacific Southwest Research Station United States Department of Agriculture Forest Service. January, 2017.

<sup>7</sup> “(i) Environmental threshold carrying capacity” means an environmental standard necessary to maintain a significant scenic, recreational, educational, scientific or natural value of the region or to maintain public health and safety within the region.” (Article II) [Emphasis added]

<sup>8</sup> “In addition, individual projects would be required to complete project specific environmental review and comply with local jurisdictional standards, which would further reduce impacts.” (RTP IEC, p. 135)



The IEC appears to ignore the impact of increasing visitor traffic by focusing only on the increases in residential population for its analysis of significance:

“The increase in population anticipated under the land use scenario for the 2020 RTP/SCS is within the anticipated growth forecasts for the 2012 RTP/SCS and 2017 RTP/SCS and is therefore accounted for with existing fire and emergency response services. Therefore, the population increase projected under the 2020 RTP/SCS land use scenario would not impair adopted emergency response and emergency evacuation plans, as it is within the growth projections of adopted plans.”<sup>9</sup>

As most issues involving significant congestion occur during periods of peak visitation, the environmental analysis must address visitor impacts when evaluating the significance of the hazards from wildfire.

#### **Emergency Response/Access:**

More vehicles and absolute VMT will impede emergency responses to both aid people, address traffic accidents, etc., as well as to respond to wildfires. For example, the SR 89 Corridor Management Plan notes: *“Traffic congestion seriously impacts emergency response times in the corridor, with an estimated average of 12 minutes of delay for trips through the corridor and a maximum delay of 30 minutes.”*(Final SR 89 Appendices, p. 16). This impact must also be adequately analyzed and disclosed along with the inclusion of additional measures to reduce visitor traffic.

#### **Inadequate funding sources:**

##### **Historic funding levels are inadequate and uncertain:**

The RTP’s list of funding sources does not provide confidence that these strategies will be funded; insufficient funding for transportation projects and transit has been an ongoing problem for decades. As more investment in transportation is needed if we are to avoid the chronic budget shortfall that has plagued all previous transportation plans, simply relying on funding that is similar to historic levels, as most projects in Appendix C do, will not suffice. Not only do we need more funding to address current transportation needs, but more funding is also needed to significantly expand transportation programs to address the existing and anticipated future increases in visitor traffic.

The RTP also provides no evidence to suggest that historic funding levels will continue. Political landscapes and changing economic conditions, as well as the current COVID pandemic, have all affected federal, state, and local budgets and are anticipated to continue to do so.

##### **Funding from fuel taxes will decrease:**

The RTP also relies on funding from sales and fuel tax (California) and fuel tax (Nevada).<sup>10</sup> However, with improved technology and anticipated increases in use of electric vehicles, taxes collected on fuel will decline. We do not believe it is realistic to rely on historic funding levels from these taxes.

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<sup>9</sup> P. 223

<sup>10</sup> Appendix C, p. 154

### **Excess cost burden placed on residents:**

The greatest transportation impacts are associated with visitors,<sup>11</sup> especially during peak times, yet the current funding system places most of the cost on residents. The RTP's proposed funding strategy does not remedy this situation.

While we understand the Bi-State Transportation Consultation Group has reconvened to examine funding options, unless progressive actions are taken to identify significant increases in funding, the RTP is likely to continue to remain underfunded, as has been the case for decades. In fact, the RTP notes a \$1 billion shortfall in funding.<sup>12</sup> Multiple groups have been convened to come up with solutions to fill this shortfall over the last several decades without success, and we are concerned that this cycle will continue.

It is also unclear whether public funding will be required to improve/develop the infrastructure needed to support the anticipated private funding sources. This needs to be clarified in the documentation.

### **Failure to consider new relevant information in IEC:**

The IEC completed for the project includes the following questions for all resource impacts, per CEQA and TRPA:

**"Any New Information Resulting in New or Substantially More Severe Significant Impacts?  
Do IS/IEC Mitigation Measures Address and/or Resolve Impacts?"**

In responses throughout the IEC, the response identifies the impact as having been analyzed in the 2012 RTP/SCS and answers "no." We do not believe this is correct. The RTP/SCS used 2010 as the base year for the impact analysis. There have been substantial changes in the basin since 2010, as well as advances in scientific understanding, therefore there is "New Information Resulting in New or Substantially More Severe Significant Impacts." Examples include:

**1. Climate Change – impacts all environmental resource areas and public health and safety**

Climate change has been increasing at a faster rate than scientists originally predicted.<sup>13</sup> This is leading to warmer lake temperatures (which negatively impacts lake clarity), increased wildfire danger, increase flooding, more rain and rain-on-snow events, a smaller snowpack that melts sooner, changes in water supply, increased incidence of invasive species, and other negative impacts.<sup>14</sup>

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<sup>11</sup> [https://cbf674e7-b8cd-47a2-883f-3f9e0b2e80de.filesusr.com/ugd/4e7b4c\\_f8a0668d25ac4e2f94f21b3b8a69476a.pptx?dn=ListeningSessionPresentationTier3\\_Final](https://cbf674e7-b8cd-47a2-883f-3f9e0b2e80de.filesusr.com/ugd/4e7b4c_f8a0668d25ac4e2f94f21b3b8a69476a.pptx?dn=ListeningSessionPresentationTier3_Final)

<sup>12</sup> "Overall, TRPA has forecasted \$2.2 billion in revenues over the course of the 25-year plan. The total transportation project costs included are estimated at \$3.2 billion leaving an approximate funding gap of \$1 billion." (p. 151).

<sup>13</sup> E.g. <https://blogs.scientificamerican.com/observations/scientists-have-been-underestimating-the-pace-of-climate-change/>; <https://www.nytimes.com/2019/12/04/climate/climate-change-acceleration.html>; <https://www.climate.gov/news-features/understanding-climate/climate-change-global-temperature>

<sup>14</sup> <https://tahoe.ucdavis.edu/climate-change>; <https://www.nationalforests.org/assets/files/Lake-Tahoe-West-Landscape-Resilience-Assessment-V1-FINAL-11Dec2017.pdf>

**2. Visitation – impacts all environmental resource areas and public health and safety with emphasis on transportation impacts**

As has been frequently discussed among decision-makers and stakeholders, visitation has been steadily increasing over the past few years, and even more substantial increases occurred this year as a result of the COVID pandemic. The most recent VMT estimate violates the TRPA standard,<sup>15</sup> whereas the VMT standard was in attainment in the 2012 RTP/SCS based on the 2010 baseline.<sup>16</sup>

**3. Popularity of GPS applications for travel – impacts to transportation, water quality, and public health and safety**

The popularity of GPS-based Apps has exploded since the 2010 Base Year, resulting in significant impacts to traffic and emergency access during peak periods. Less-known routes once available for residents and emergency responders have become regularly clogged with visitor traffic, creating extensive gridlock and blocking emergency access. This has also placed far more vehicles on non-state or federal roads that were designed primarily for residential use, leading to faster breakdown of roadway materials that contribute to particulate pollution.

**4. Increased demand for recreation – impacts to all resource areas**

As noted in the recent SR 89 Corridor Management Plan,<sup>17</sup> “the demand for visitation has risen to a level that is not sustainable for the current infrastructure and operational capacity.” Although that statement is in reference to the SR CMP plan area, it is common knowledge that in general, all popular areas of the Basin have experienced increased demand for recreation. When visitation demand exceeds existing infrastructure, there is “increased environmental disturbance and stormwater run-off resulting in degraded lake clarity.” Increased demand/over-use also leads to resource impacts as the environment is degraded (i.e. when too many visitors use a hiking trail, it will lead to negative environmental impacts).

**5. Increased popularity of short-term rentals and App-based platforms – impacts to transportation and public health and safety**

The increased popularity of vacation-rental platforms such as VRBO and AirBnB have resulted in significant increases in the use of homes as short-term rentals (STRs) in more recent years.<sup>18</sup> Often, the STRs are not within the town centers where TRPA’s Regional Plan (and 2012 RTP) planned to locate them, therefore the transportation strategies that rely on placing tourists in town centers to reduce their driving once they are here do not provide the benefits that were assumed in the 2012 RTP. In addition, STRs often have far more guests/unit than the hotel/motel rooms that used to be the primary tourist units in the Basin.

## Peak visitation and “Annual Averages”:

The use of annual averages when examining vehicle impacts fails to account for the impacts of peak periods, therefore we are concerned with the proposed VMT standard that is based on an annual average.

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<sup>15</sup> IEC, p. 200

<sup>16</sup> 2011 Threshold Evaluation Report, p. 3-59

<sup>17</sup> SR 89 Corridor Management Plan, p. 18

<sup>18</sup> [https://mountainhousingcouncil.files.wordpress.com/2019/03/mhcstrwhitepaper\\_final.pdf](https://mountainhousingcouncil.files.wordpress.com/2019/03/mhcstrwhitepaper_final.pdf)

One of the greatest concerns associated with peak period congestion is related to emergency evacuations and access. As noted previously, the TRPA Compact requires TRPA to protect public health and safety. The RTP must evaluate and identify mitigation measures to reduce peak period congestion and provide for improved emergency access. As proposed, the RTP will allow for *more* traffic during peak periods.

### **Impacts to beneficial redevelopment projects:**

We understand that restrictions posed by the existing VMT standard may have created barriers to the approval of beneficial redevelopment projects by placing a significant burden on local developers to address VMT from their projects although a significant portion of the absolute VMT comes from visitors, including day visitors. However, as noted elsewhere in these comments, we believe there are actions the agency *can and should* take to address the impacts of visitor traffic, and that doing so would in fact aid in allowing for the approval of beneficial redevelopment projects while still achieving and maintaining TRPA's environmental thresholds and protecting public health and safety.



Tahoe Regional Planning Agency  
Attn: Dan Segan  
PO Box 5310  
Stateline, NV 89449

August 27, 2020

**Subject: Vehicle Miles Traveled Threshold Update Baseline and Project Level Assessment Approach**

Dear Dan:

We appreciate the opportunity to serve on the Transportation Technical Advisory Committee (TTAC) and provide input on such important topics. As we relayed previously, schedule conflicts prevent us from attending today's meeting, however we want to provide you with feedback for consideration. We also ask that you distribute this to other TTAC members.

## VMT "Absolute" vs. "Efficiency" Standard

The staff report states that the TTAC is being asked to provide recommendations related to four threshold update topics and two topics on the project level assessment approach. However, the recommendations appear to make the assumption that the VMT standard will be measured with a per capita (or what the report terms "efficiency") standard, rather than the existing capacity-based regional VMT standard (or "absolute" standard). As we have expressed for years, we do not support the elimination of an 'absolute' VMT standard. While the original standard was tied to NOx emissions that have substantially improved, VMT still affects several air quality standards and other thresholds including but not limited to water quality (i.e. through particulate emissions, resuspension of roadway materials, faster degradation of roads which reduces the efficiency of street sweeping and can lead to more particulates from wear and tear), noise, scenic resources, and recreation. VMT is also a public health and safety issue, even more so given climate change and the anticipated increases in wildfires, flooding, and other events where major evacuations may be required.

The TRPA Compact specifically requires *carrying capacities* be established. The proposed per-capita standard includes no maximum cap on VMT. Even if per-capita VMT decreases, the population could increase, creating a net increase in overall VMT and its accompanying environmental impacts. FOWS supports the inclusion of a per-capita VMT standard, but it should not be in lieu of an "absolute" VMT metric; it should be *in addition to*. Further, the assumed elimination of the absolute VMT metric, combined with other statements in the staff report, suggest a notable change in how TRPA views its role that appears to conflict with the purpose of the TRPA Compact, which requires that TRPA ensure the environmental **carrying capacity** of the Lake Tahoe Basin not be exceeded.

For example, the report states: *"To protect and preserve the national treasure that is Lake Tahoe for future generations, the Regional Plan places strict controls on the pace of and total amount of development allowed in the region (TRPA 2012). It does not, nor does TRPA have the power to, limit the total number of individuals that choose to reside in Tahoe or visit Tahoe."* (p. 11) and *"The proposed use of an efficiency based VMT target for the region is consistent with the California statewide approach to promoting more sustainable development patterns that provide residents with options other than driving, while not limiting*

*population or visitation.*" (p. 13) [Emphasis added]. In fact, the Compact requires TRPA to ensure the environmental carrying capacity of the basin is not exceeded. The abrogation of any role in addressing overpopulation when it is damaging the very environmental resources that TRPA was formed to protect is contrary to the intent of the TRPA Compact.

The report also states that TRPA wants to be in alignment with state policy. We support this, **so long as it does not reduce the environmental protection that the Compact requires.** Lake Tahoe is a National Treasure, an Outstanding National Resource Water, and is world-renowned for its beauty. State policies may be appropriate in larger urban centers throughout the state, but they are not focused on protecting the unique environmental sensitivity of the Tahoe Basin. The insufficient protection provided by state laws that are not tailored to the basin is why the TRPA was formed in the first place.

In sum, there is a much larger discussion to be had about this proposed change to the VMT standard. **The TTAC is not the appropriate venue to consider such changes to TRPA's role and responsibilities.** We request any recommendations that assume elimination of the absolute VMT standard be tabled for further discussion until adequate discourse about TRPA's role and responsibilities has occurred.

## Policy Considerations and Recommendations

### *VMT Standard*

1. VMT to be included – We support the staff recommendation. All VMT has an impact to Tahoe's environment and therefore all VMT must be included.
2. Types of travel to be included – We support the staff recommendation for the same reason as number 1.
3. Time period – There are two items here: first, the length of time that will be used to assess the standard, and second, the timeline used for establishing the baseline.
  - a. Time period of standard: We do not support the staff recommendation to change the VMT metric to an annual average. The impacts of VMT occur on far shorter time scales (e.g. air quality pollution is regulated on timelines as short as by the hour and/or day, water pollution can have a greater impact depending on the season, and public health and safety impacts may be greater during periods of high fire danger). In fact, as we have suggested in the past, we believe there should be a distinct VMT standard for peak periods in both winter and summer.
  - b. Timeline used for establishing baseline: We support the staff recommendation to rely on 2016-2018 data to establish the baseline, however do not support the use of an annual average, as noted above. Also, recognizing that the impacts of 2020 cannot be included, the new trends resulting from the COVID pandemic (e.g. increased full-time residents, increased visitation, etc.) will need to be incorporated into future modeling and adequately accounted for in all future traffic analyses and plans. In addition, establishing the baseline is different from establishing what the target VMT will be in the future, which should be determined based on the environmental carrying capacity of the basin and time period of the impacts, as noted previously.

4. Baseline VMT for standard establishment – The recommendation related to use of the Activity-Based (AB) Tahoe model versus the Streetlight and other data throughout the staff report is unclear. Is staff proposing to rely solely on Streetlight data, and/or NDOT and Caltrans data for the VMT standard? How will this relate to the AB model? We request further clarification.

### *Project-level Transportation Impact Assessment*

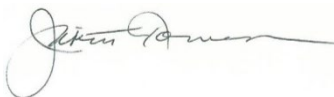
1. Dynamic Testing – It is unclear what the proposed ‘case studies’ would be. For example, are these approved projects, and/or projects currently being planned? Would this entail some level of model ‘calibration,’ or would it be more focused on providing future inputs to the model?
2. VMT Metrics – The VMT metrics will need to be directly correlated with the VMT standard(s). As noted, we do not support staff’s recommendation to eliminate the absolute VMT standard. We would support metrics that include both absolute and per-capita VMT outputs that can be evaluated in a way that is meaningful and correlates with the VMT standard(s).

### Time for meeting preparation

The TTAC agenda and materials cover an extensive amount of important and very detailed information that needs to be reviewed, digested, and carefully assessed in order to provide informed feedback and recommendations. In addition, there are many committee members who will need to take this information ‘up the ladder’ before recommendations can be made on behalf of any organization or entity. The materials were emailed out last Wednesday evening, leaving five business days for members to review materials, contemplate proposals, and speak with organizational board members and superiors about the content and recommendations. As noted above, the proposals include significant policy changes that have the potential to affect TRPA’s role and responsibilities; these require far more extensive discussion and collaboration. In addition, there are numerous technical details that have a direct effect on the policy questions and therefore require extensive study and review. Five business days is not sufficient time to review and address this information (nor do TTAC members have the entirety of those five days to focus on this one project). We urge TRPA to provide members at least twelve business days to review materials in the future, preferably more (especially when there are larger implications as there are with the current agenda).

We look forward to continued participation in this process. Please contact Jennifer Quashnick at [jqtahoe@sbcglobal.net](mailto:jqtahoe@sbcglobal.net) or (530) 573-8929 if you have any questions.

Sincerely,



Judith Tornese,  
President



Jennifer Quashnick,  
Conservation Consultant

## Michelle Glickert

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**From:** jaybuel@usa.com  
**Sent:** Monday, October 12, 2020 10:55 AM  
**To:** Michelle Glickert  
**Subject:** Bus Hub at Incline

Hello

I would like to express my support for a full and fair review of the TTD proposal.

The hysterical NIMBY reaction of a few voices in Incline are premature and prejudge the merits.

Thank you

Jay Buellton

Sent using the mobile mail app



## Michelle Glickert

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**From:** Doug Flaherty <tahoebblue365@gmail.com>  
**Sent:** Monday, October 12, 2020 11:41 AM  
**To:** Michelle Glickert  
**Subject:** Protest Converting Old Incline Village School Property To a Bus Hub

Greetings Michelle,

As a full time resident of Incline Village, NV I would like to protest conversion of the Old Incline Village Elementary School property being converted to a bus transportation hub for the following reasons:

1. Direct and indirect environmental and quality of life impacts on the local Incline Village community have not been adequately identified, discussed or considered including traffic congestion, large vehicle egress and entry life safety hazards, including what is currently a high use child and family pedestrian area, high level noise and dust pollution impacts on close by adjacent businesses and high level noise and dust pollution impacts on close by and adjacent multi family residents. These impacts will have a significant negative impact on daytime and nighttime quality of life in and around the center of Incline Village.
2. With the short construction season window in the Lake Tahoe Basin, direct and indirect environmental and other impacts on the local Incline Village community as described above, during what could surely be **years of grading and construction until the hub is eventually completed** have not been adequately identified, discussed or considered. These impacts will have a significant negative impact on daytime and nighttime quality of life in and around the center of Incline Village.
3. Ample consideration, discussion and identification of alternative land use, including much needed affordable housing has not taken place.

Please move to prevent the use of this property for a bus hub location and what will surely be a significant impact on Incline Village air, noise, daily enjoyment of life as well as increasing winter dust, dirt and mud runoff accumulations/sediment from increased heavy bus traffic, which will eventually find its way into adjacent creeks and Lake Tahoe itself.

Sincerely,

Doug Flaherty

Resident

Incline Village, NV

[TahoeBlue365@gmail.com](mailto:TahoeBlue365@gmail.com)

## Michelle Glickert

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**From:** Karen Johnson <karen@BKRgo.com>  
**Sent:** Monday, October 12, 2020 1:10 PM  
**To:** Michelle Glickert  
**Subject:** Bus Hub in Incline Village

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

I protest the old elementary school being used for a bus hub.

Regards,

Karen Johnson  
707-696-4196

## Michelle Glickert

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**From:** pmosermorris@gmail.com  
**Sent:** Monday, October 12, 2020 7:02 PM  
**To:** Michelle Glickert  
**Subject:** I oppose the project being proposed by the Tahoe Transportation District to purchase the old school at 777 Southwood Boulevard in Incline Village, Nevada, demolish the school, and replace it with a regional transportation hub.

**Importance:** High

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

*Patricia Moser Morris*  
*330 Ski Way #11*  
*Incline Village NV 89451*  
*[pmosermorris@gmail.com](mailto:pmosermorris@gmail.com)*  
*775-434-4155*

October 12, 2020

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
VIA: [mglickert@trpa.org](mailto:mglickert@trpa.org)

Dear Ms. Glickert:

I oppose the project being proposed by the Tahoe Transportation District to purchase the old school at 777 Southwood Boulevard in Incline Village, demolish the school, and replace it with a regional transportation hub, for several reasons.

The site proposed for the regional transportation hub – smack-dab in the middle of a residential area -- is spectacularly inappropriate because it is literally across the street from an apartment complex where more than 100 children live.

Furthermore, the process followed in implementing this proposed project seems highly irregular, if not outright illegal. According to our County Commissioner Marsha Berkgigler:

1) The Tahoe Transportation District board did not vote to support this project; and did not vote to obtain the grants that are being used to purchase this property. As a former manager of the federal Community Development Block Grant program in the Fourth Supervisorial District of Riverside County, California, I do not understand how a grant can be applied for by a public agency without the governing board of said agency taking official action to approve the grant application.

2) The decision to apply for these grants was made at a meeting to which County Commissioner Berkbigler was neither invited nor even advised that it was taking place, even though Commissioner Berkbigler is a member of the governing board of the Tahoe Transportation District. In other words, said meeting was not noticed publicly in compliance with applicable law. Thus, it was illegal and could not bind the Tahoe Transportation District.

3) NO public hearings were held regarding this proposed project.

4) Apparently, this proposed regional transportation hub is planned to serve an expanded public transportation system linking the Lake Tahoe area to Reno and Carson City, but funding for such an expanded regional transportation system has not been obtained, or even planned. How does it make sense to build a regional transportation hub when the system it would serve has not been funded?

For all these reasons, I urge you to find another, more appropriate site for the proposed regional transportation hub or, failing that, cancel the proposed project altogether. In any case, you should not proceed with the project unless and until you have obtained funding for the expanded regional transportation system that it would serve.

Sincerely,

*Patricia J. Moser Morris*

## Michelle Glickert

---

**From:** Carina Cutler <carina@cutlerteam.com>  
**Sent:** Tuesday, October 13, 2020 5:12 PM  
**To:** Michelle Glickert  
**Subject:** Regional Transport Plan Feedback

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hello M. Glickert,  
Thanks for taking Tahoe transportation plan input. Full disclosure: I did not read the entire plan.

Comments:

A. Love the water transit, the micro on-demand zones, the charging stations, the out-of-basin parking zones, and the walking/bike paths!

B. Needed now in 2021, not in 2045 (**for fire safety**):

1- Water ferries that can be diverted in case of wildfire to shuttle people to safety. All public and shared private piers should be used in case of emergency. (Gates on private community piers to open in case of emergency evacuation.)

2- RFID enforced basin limits on traffic during wildfire season. Start with RFID toll stations to reduce traffic counts. Clearly local residents and workers would need some sort of inexpensive summer pass. (Winter regulation is less important due to reduced fire danger.) Day and weekend recreational trips should be relatively expensive and cancellable in the case of extreme fire danger. The proceeds for the tolls should go towards 1) upkeeping the toll system and 2) paying for the emergency ferry evacuation system.

Thanks for prioritizing our safety and our freeway-less way of life.

Kind regards,



**Carina Cutler**  
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## Michelle Glickert

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**From:** Emily Setzer <setzerem@gmail.com>  
**Sent:** Thursday, October 15, 2020 11:47 AM  
**To:** Michelle Glickert  
**Subject:** Regional Transportation Plan comments

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

Hi,

I'd like to provide comments on the Regional Transportation Plan.

- Regarding Appendix B Project List, the Kings Beach/Brockway community would like the Brockway Vista Multi-Use Trail to be built much earlier than the proposed timeline. We would like this timeline pushed to 2021-2025. This is an unsafe section of road with many cars speeding and is a key connection between Kings Beach and the Crystal Bay entertainment core. A local worker just got hit badly by a car while he was on bicycle trying to commute this section of road. Visitors and residents are regularly seen walking along the shoulder. Another option temporarily would be to open up Brockway Road to pedestrians and bicycles. It is currently gated but provides a safer alternative to Hwy 28.

- North Tahoe Regional Bike Trail - I would like to suggest this timeline be pushed up to a 2026-2035 timeframe. This is a key section between Placer's two town centers of Kings Beach and Tahoe City, and would allow many workers in the area to commute safely off the road. Waiting until after 2035 to build this section is really unacceptable and substantially delays benefits to our residents and tourists.

Thank you,

--

Emily Setzer

## Michelle Glickert

---

**From:** Michelle Glickert  
**Sent:** Thursday, October 15, 2020 7:38 PM  
**To:** Tobi Tyler  
**Subject:** FW: TRPA's RTP webinar

Evening Tobi, thanks again for tuning in to the 2045 Regional Transportation Plan (RTP) webinar Monday. Sorry we could not get to your question about development impacts to transportation.

The Lake Tahoe Regional Plan sets growth caps for the Tahoe Basin and is very clear about how much growth can occur and where. Lake Tahoe is unique in the United States in that development is limited and managed at the watershed level across multiple jurisdictions. The Regional Plan also requires all development projects to meet environmental threshold standards in nine categories ranging from water quality to scenic resources. The RTP is the transportation element of the Regional Plan and supports achievement of many environmental thresholds.

I would like to highlight two policies, specifically, one that addresses growth outside the Region and one that focuses on trips within the Region:

**Policy 2.4** - Collaborate with nearby communities that share transportation to and from the Tahoe Basin, including but not limited to; the Town of Truckee, Placer County Resort Triangle, Sacramento, Bay Area, Reno, and the Carson/Minden valley. *This is to address growth outside of the region*

**Policy 1.1** - Support mixed-use, transit-oriented development, and community revitalization projects that encourages walking, bicycling, and easy access to existing and planned transit stops. *This is to ensure we do not increase trips with development.*

The RTP relied on an updated land use forecast, which included development anticipated within the next 25 years. That forecast provided a baseline for identifying the future transportation system needs. That forecast modeled growth in residents and visitors ([Appendix G](#)), transportation projects ([Appendix B](#)), and the effectiveness of transportation programs and projects that were not in the modeled forecast (see TRIA 2.0 in [Appendix G](#)) to understand how the plan performs with growth.

The RTP is updated every four years, and each update continually improves the data used to forecast, track performance, and align transportation projects to identified needs. For example, we are currently working with members of the Tahoe Science Council, the University of Nevada, Reno, and the University of California, Davis to refine visitation numbers basin-wide including origin and destination data. This will help us plan transportation improvements for the future.

That being said, development and redevelopment is estimated to account for approximately 2 – 3 % of future vehicle miles travelled (VMT) because Lake Tahoe is approaching build out. Roughly 96% of all possible development in the Tahoe basin is already in place and redevelopment will only be responsible for its net increase in VMT.

However, it is still important that development and redevelopment does not negatively impact the transportation system. TRPA is currently developing project level tools to assess and mitigate impacts of development to transportation, in collaboration with Placer County, California. Information on this work has been shared with the Transportation Technical Advisory Committee (TTAC), and can be found in Other Meeting Materials, here: <https://www.trpa.org/category/other-meeting-materials/>.

In addition to the above, the Communities section of the RTP includes very detailed strategies to ensure that Tahoe's corridors, including those that function as our main streets, like SR 28 in Kings Beach and US 50 in South Lake Tahoe, are



planned in a holistic manner: trails are connected, transit service is robust, and programs to provide incentives to employee to get them to work car free are in place, so that everyone, from visitors to residents and employees have transportation options other than their personal automobile. Additionally, the plan includes parking management strategies that include paid parking, pricing differentials that spread the peak out, and all encourage getting their car free.

Please let me know if you have any further questions.

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



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**From:** Michelle Glickert  
**Sent:** Thursday, October 15, 2020 1:54 PM  
**To:** Tobi Tyler <[tylertahoe1@gmail.com](mailto:tylertahoe1@gmail.com)>  
**Subject:** RE: TRPA's RTP webinar

Afternoon Tobi, see [if this link](#) works for you. Once open, use the control (CTRL) F function to pull up a search window. Let me know if this doesn't work otherwise I can send pdfs via emails, it will be about 8 or so individual emails due to size. Fingers crossed the first options works. Sorry for the delay on your response, several of my colleagues wanted to chime in and its taking longer than I expected.

Can't thank you enough for taking time to read and comment on the plan,

Michelle

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**From:** Tobi Tyler <[tylertahoe1@gmail.com](mailto:tylertahoe1@gmail.com)>  
**Sent:** Thursday, October 15, 2020 1:48 PM  
**To:** Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)>  
**Subject:** Re: TRPA's RTP webinar

Hi Michelle,  
Could you provide me with a pdf version that can search for words? The one on the website doesn't appear to be able to do that and this would be extremely helpful in reviewing the document.  
Thanks  
Tobi

On Mon, Oct 12, 2020 at 4:06 PM Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)> wrote:

Sure thing Tobi, I am drafting up an email now but want to fold in other colleagues from Long Range and Research and Analysis to make sure we hit everything. Unfortunately today we did not have enough time and some key individuals couldn't make it. I will get right back to you.

Thanks for tuning in today,

Michelle

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**From:** Tobi Tyler <[tylertahoe1@gmail.com](mailto:tylertahoe1@gmail.com)>  
**Sent:** Monday, October 12, 2020 1:09 PM  
**To:** Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)>  
**Subject:** TRPA's RTP webinar

Hello,

During the Q&A, I asked the last question cited about development increases conflicting with transportation challenges. Please send me more information about this as discussed.

Thank you

Tobi

## Michelle Glickert

---

**From:** Sarah Miller <tryanything3@icloud.com>  
**Sent:** Monday, October 19, 2020 3:56 PM  
**To:** Michelle Glickert  
**Cc:** schmitz61@gmail.com  
**Subject:** Public Input on the Regional Transportation Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

I am writing as the wife of a now deceased member of the Tahoe Regional Planning Board. I share his concern for the preservation of Lake Tahoe's unique clarity and the ecology. "Don't it always seem to go, that you don't know what you've got till it's gone. They pave paradise and put up a parking lot." (by the Counting Crows). The lyrics perfectly describe what is happening here.

As a 40 year resident of Incline Village I have seen many things change for the better, but your aggressive plan to force people to use buses to get around goes too far, in my opinion. You are attacking the rural quality of life here, and charging residents to pay another "fee" to use our roads is unconscionable. We already pay the county and state to maintain roads here.

There has always been a distinct difference between South Lake Tahoe and the communities of the North Shore, but with your plan, that distinction will be erased. More of the land around the road will be developed and parking lots built in many places to accommodate tourists. We already see what disruption the East Shore Path has brought to Incline, as beautiful as that path is. I do not want it extended so that the entire East Shore is overused.

If you want visitors to use the service you propose, you have to make the schedule more robust. That will mean a traffic mess around the proposed hub at the old elementary school. It will cause even greater traffic jams on 28 and interruptions to traffic flow on side streets where buses pick up passengers.

You are trying to impose an infrastructure where there is not room! ( or is your next requirement the addition of lanes to our accommodate the tourist economy?) This is a place of limited capacity due to the mountains rimming the lake. Only so much land can be used without damaging the ecosystem. TRPA has always stood against overuse, but the transportation district seems to have a plan to make it more likely

Please reconsider this plan and take into consideration that those who are moving here from the congestion of the cities do not want to see Incline (and Tahoe) citified!

Sarah E. Miller  
568 Ponderosa Ave.  
Incline Village, NV. 89451  
tryanything3@icloud.com

## Michelle Glickert

---

**From:** Michelle Glickert  
**Sent:** Thursday, October 22, 2020 8:49 AM  
**To:** ian gover  
**Subject:** RE: TRPA Transportation Plan

Morning Ian, thanks for taking time to express your support and concerns. There is additional consideration for crossings and intersection improvements along our state routes, which as you know our are "Main Streets" as well. In 2019 we developed a [Safety Strategy Plan](#) that identified these needed projects. Placer County has also just completed a focused transportation plan for your area. It is plans like the Safety Strategy and the [Resort Triangle Transportation Plan](#) that feed into the RTP. The RTP identified some funds to start implementation of projects identified in the Safety Strategy. It does not however identify secure funding for all locations identified, as you will see in the plan there are numerous locations. The identification of the general project in the RTP will allow implementing agencies like Caltrans and Placer County to move forward on improvements, making them eligible for state and federal dollars. I am going to pass along your email to my colleagues at Placer County to make sure your voice is heard for improvements needed around Cedar Flats.

My apologies for the long winded response. Thanks again for your valued input and time.

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



---

**From:** ian gover <[ian.gover@gmail.com](mailto:ian.gover@gmail.com)>  
**Sent:** Monday, October 19, 2020 8:20 PM  
**To:** Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)>  
**Subject:** TRPA Transportation Plan

Hi Michelle - Very excited about the trails and bike paths. Quick question - Is there additional consideration for crosswalks and reduced speed limits for major thoroughfares in residential areas. We live in Cedar Flat and crossing route 28 to get to the lake side is absolutely terrifying... It seems like you've done a nice on reducing the speed limit and installing flashing crosswalks on west shore blvd in Tahoe city...

Thanks in advance,

--

Ian Gover  
+1 415 819 1944

## Michelle Glickert

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**From:** Kathryn Kelly <kkelly@schools.us>  
**Sent:** Monday, October 19, 2020 9:33 PM  
**To:** Michelle Glickert  
**Subject:** FW: Comments for the transportation plan

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

As a former member of the federal Lake Tahoe Basin Federal Advisory Commission, here are the briefest of comments I would like to submit on the basin transportation plan:

I am strongly in support of most of these initiatives including in particular anything that improves:

- Mass transit connections from Tahoe to RNO
- Mass transit connections from Tahoe to SMF. Both are long overdue.
- Ferries across and around the lake such as the systems they have in Sydney, Australia, and elsewhere
- Extension of bike paths around and near the lake
- Availability of day-use bikes in flat, congested areas (SLT)
- Extension of walking/hiking trails
- Enhanced forest management to help all these activities, especially trails
- More free-to-rider buses to help encourage people to get out of their cars and integration with an app to tell us when the next bus is coming
- A new bus transit center at the site of the old elementary school in Incline Village, about a block from where I work
- Imposing fees on cars traveling into the basin, just as we do for national parks

I would ask you to de-emphasize the following two distractions to the overall mission:

1. Any discussion of greenhouse gas emissions. You could eliminate every person, car, and bus from Tahoe and we will still have the very same climate change.
2. Discussion of “environmental justice” issues, which is or should be the domain of some entity other than TRPA, such as community health services. Your making the buses free to riders is the best accommodation you could give to environmental justice, period.

Thank you.

Kathryn Kelly

Kathryn E Kelly, DrPH, MEd  
Executive Director



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[I-School on Channel 2 News](#)  
[I-School in Flynn's Harp](#)



## Michelle Glickert

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**From:** T Thuma <terithuma@gmail.com>  
**Sent:** Wednesday, October 21, 2020 2:41 PM  
**To:** Michelle Glickert  
**Subject:** Grave Emergency Evacuation Problem in North Tahoe

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good afternoon-

My name is Teri Thuma and my family of 5 (including 3 children in the public school system) moved to Incline Village 2 years ago full-time. We love living in Nevada and cherish our small community.

This Summer compared to the previous, was an eye opener in our area that brought a huge concern to the forefront - **evacuation congestion** and **traffic safety** on Highway 28 from Incline Village to the 50. Covid contributed as many travelers pursued every available STR to rent, however I think one of the bigger issues is the new bike/walking path that attracts an exorbitant amount of visitors now that seem to think they can just park anywhere they'd like along 28 and pull out in front of moving vehicles without any regard.

So the grave concern is how can residents quickly and safely evacuate the area if a massive fire breaks out? Firemen have advised for us not to go Kings Beach way as it is already over congested, so our exits are 28 to 50 or 431/Mt. Rose. Well look at the scene from this summer from July all the way past Labor Day week-end (1st photo attached below). People parking on both sides of the highway with stop and go traffic and many times at a stand still because of Sand Harbor. No one would be able to get out quickly with a fast moving fire. This is a HUGE problem that needs immediate attention. In addition, we saw 3 separate near misses of cars colliding and going down the hillside off the 28, not to mention the hundreds of pedestrians that seem to think it ok to walk actually on the 28 highway as cars are trying to pass. I thought I would include another photo of the obscene amounts of trash that these visitors are leaving at Hidden Beach and beyond. They don't even think to bring their trash with them, they just leave it. This photo was on a Sunday... bears easily were going to tear through this trash because trash pick up I believe at this site was on a Monday. STR renters just really don't have Incline Village and the beaches welfare in mind, they swoop in and take over the area driving fast, leaving trash, being loud and bringing more vehicles to our one lane highways.

I am not writing to discourage visitors from coming to the area, but something has to be done about the capacity of visitors, as the highway patrol is obviously unable to control it or ticket the violators fast enough. It would be an utmost tragedy if our community experienced a Paradise like fire and unable to evacuate or under extreme smoke, because we had to wait in bumper to bumper traffic on the 28 because of all the cars parked on both sides of visitors. Several times this summer we had doctor appointments and had to literally turn off our ignition and wait sitting idly on highway 28 because of the back up traffic waiting to enter Sand Harbor in the morning. Every morning was like this, so eventually we avoided it... but this leads to my point again... what about an emergency? Fire, Medical emergencies? Highway 28 needs to be free flowing and parking limited.

I would appreciate you passing on my concern to anyone who cares about the well being of our community.

My best,

-Teri Thuma

Incline Village (FULL-TIME) Resident





## Kira Smith

---

**From:** wintmobile@aol.com  
**Sent:** Thursday, October 22, 2020 1:48 AM  
**To:** Rebecca Cremeen  
**Subject:** Regional Transportation Plan (RTP) and Vehicle Miles Traveled

Dear Ms. Rebecca Cremeen & Members of TRPA Board,

I am very concerned about TRPA's proposal to eliminate the existing VMT standard, which places a total cap on VMT in the basin, and replace it with a different standard that is based on the VMT driven per person ("per capita"). If this change is approved, VMT could continue to increase in the basin along with the number of vehicles, even if each person drives less such that the per capita standard is met. Not only does increased VMT mean more uncontrolled traffic and additional environmental impacts, but it also further threatens public health and safety.

- The proposed replacement of the existing capacity-based VMT standard with only a GHG-based VMT standard would allow traffic in the Basin to increase *without any capacity limits*.
  - o Uncapped VMT growth would result in negative impacts to other thresholds, including water quality.
  - o Uncapped VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation).
- The RTP does not adequately address traffic associated with visitors, especially day-only visitors.
- The RTP and its relationship to the existing TRPA VMT standard is confusing and it is unclear how the Initial Study is judging the significance of the VMT impacts.
- The RTP policies and TRPA statements indicate that TRPA is "giving up" on controlling visitor traffic in the region, but isn't that what a regional planning agency is supposed to do?

Please do not approve the change in the VMT standard and the RTP, as currently proposed.

Thank you,

Jerry Winters

Tahoma, Calif.

**DEPARTMENT OF TRANSPORTATION**

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*Making Conservation  
a California Way of Life.*

October 22, 2020

Michelle Glickert  
Principle Transportation Planner  
Tahoe Regional Planning Agency (TRPA)  
P.O. Box 5310  
Stateline, NV 89449

**Draft Tahoe 2020 Regional Transportation Plan/Sustainable Community Strategies –  
Caltrans Comments**

Dear Ms. Glickert:

Thank you for the opportunity to review and comment on the Tahoe Regional Planning Agency's (TRPA) Draft Linking Tahoe 2020 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). Our review concluded that the plan will require additional elements and clarifications to meet state and federal requirements. We would like to offer the comments below to assist in the development of the plan.

General Comments:

- Caltrans commends TRPA for providing a vivid description of how the region will change over time when the goals and policies of the RTP are realized.
- TRPA should ensure that the RTP Checklist encompasses all pages and sections of the RTP that meet that specific requirement.
- The maps/figures on pages 10, 20, 21, 29, 72, 81, 83, 85, 87, 89, & 91 (Figures 10-13; 11-14; 22; 54-55; 59-64) are difficult to read and should be enlarged.
- On page 39, figure 33 should identify the names of the highways and routes shown on the map.
- The Trails Results Chain figure on page 103 is not legible.

Metropolitan Transportation Planning Rule – Performance Measures

- TRPA as the designated Metropolitan Planning Organization (MPO) for the Tahoe region is subject to the Metropolitan Transportation Planning rule (23 CFR Parts 450 and 771 and 49 CFR Part 613), jointly released by FHWA and FTA. This rule guides how performance measures will be incorporated into the planning and programming processes.
- The regional transportation planning process "shall provide for the establishment and use of a performance-based approach to transportation decision making to support the national goals described in 23 U.S.C. § 150(b) and the general purposes described in 49 U.S.C. § 5301(c)." (23 CFR 450.306)

28

- The Regional Transportation Plan “shall, at a minimum, include: A system performance report and subsequent updates evaluating the condition and performance of the transportation system with respect to the performance targets described in § 450.306(d) (23 CFR 450.324)
- Chapter 5 and the Executive Summary should include a discussion about the overall required MPO Transportation Performance Management process and Performance Based Planning and Programming in the Final RTP.
- Chapter 5 should include a description of TRPA’s coordination efforts with both Caltrans and the Nevada Department of Transportation (NDOT), as well as coordination with local jurisdictions and transit operators in the region to meet or make progress towards achieving targets in the Final RTP.

28a

FHWA’s Required Performance Measures – PM 1, PM 2, and PM 3

- Chapter 5 needs to have a section summarizing the FHWA performance rule requirements for PM 1, PM 2, and PM 3. There is a total of 18 performance measures and the list of performance measures is included in Amendment 1 to the Memo of Understanding of Comprehensive Federal and State Transportation Planning and Programming, dated May 23<sup>rd</sup>, 2018, signed by TRPA, NDOT, and Caltrans.
- In the Draft 2020 RTP, TRPA is missing most of FHWA’s required performance measures. These missing performance measures and targets need to be identified and a description and explanation of all 18-performance measure must be provided in Chapter 5 or Appendix I in the Final RTP.
- The Draft RTP is also missing a discussion as to how TRPA will be planning and programming projects to make significant progress in achieving California performance targets in Lake Tahoe Basin region. This needs to be done for each performance measure. The Final RTP should include some analysis as to how TRPA will move the needle on meeting the performance targets in the region.

28b

28c

FTA’s Transit Asset Management (TAM) Performance Measures

- Chapter 5 needs to have section summarizing the TAM performance rule requirements for TRPA and the RTP.
- A description and explanation of all the federally required TAM performance measures needs to be included in the Final RTP. These performance measures are listed in Appendix I, but no discussion is provided in the Draft RTP.
- The Draft RTP is missing the local or regional or State performance targets for each federally required TAM performance measure.
- The Draft RTP is also missing a discussion as to how TRPA will be planning and programming projects to make significant progress in achieving TAM performance targets. This needs to be done for each performance measure. The Final RTP needs to include some analysis within their Final RTP as to how TRPA will move the needle on meeting the TAM targets in the region.

28d

## FTA's Required Public Transit Agency Safety Plan (PTASP) Performance Measures

- Chapter 5 needs to have section summarizing the PTASP performance rule requirements for TRPA and the RTP.
- The timeline requirements for MPO's to include the PTASP performance measures was recently pushed farther back by the FTA because of COVID-19. MPOs are required to reference the safety performance targets and Agency Safety Plans in their TIPs and RTPs updated or amended after July 20, 2021.
- Is TRPA going to add the PTASP performance measure and performance targets into the Final RTP?
- The PTASP performance measures should also include a description of the anticipated effect towards achieving the performance targets identified in the RTP, linking investment priorities to those performance targets.

28e

## Local/Regional Constrained Funding Sources and Revenues:

- The local/regional funding sources in the Draft RTP account for 49% of the total revenues in the Draft RTP as depicted in Page 97/Figure 67. There is confusion on what the local/regional funding sources are and how much revenue they will be generating as part of the RTP Financial Plan.
- There is no explanation in the Draft RTP for the Other Local funding sources and the Regional Revenues. There is also no mention if the local/regional funding sources are new or existing funding sources.
- In Chapter 4 or Appendix C, there needs a thorough discussion and explanation on what all the local and regional revenue funding sources are and how much revenue they will be generating.
- For example, the One Tahoe Initiative has recently recommended prioritizing new regional Transportation User Fees. Chapter 4 or Appendix C does not mention the new transportation user fees and no details are discussed about the new regional revenues. However, listening to TRPA staff presentations on the Draft RTP, they have mentioned the new transportation user fees are included in the Draft RTP Financial Plan and that the new transportation user fees anticipates collecting revenues starting in 2026 in the Draft RTP.
- We are concerned that the "regional revenue sources" in Appendix C are listed as a constrained funding sources but might not be "reasonably expected to be available" since there is no explanation on what these funding sources are and why they are reasonably expected to be available.
- Are there any new Federal, State, local, and regional revenue funding sources in the Draft RTP Financial Plan that have not been collected/received in the past? If so TRPA needs a thorough discussion on what these new funding sources are and why they are "reasonably expected to be available."

28f

28g

## Financial

- If applicable, TRPA must clearly identify any regionally significant projects in their project list or include a statement that there are no regionally significant projects during this planning period. More information, including the definition of regionally significant projects, can be found on page 136 of the Regional Transportation Plan Guidelines.

28h

## Regionally Significant Projects:

- Please reference the U.S. 50 South Shore Community Revitalization Project-03.01.02.0024 in the Final RTP.
- Section 6.17 of the RTP Guidelines for MPOs has a description/definition of regionally significant projects.

## Consultation/Cooperation:

- TRPA includes a brief discussion on the federal land management agencies within its jurisdictional boundary, but it is unclear how these federal agencies participated in the preparation of the Draft RTP, especially US Forest Service-Tahoe and the Bureau of Land Management. Please include an additional discussion.

28i

## Modal Discussion

- The Draft RTP includes several discussions around highways and interregional connectivity, however the RTP Checklist does not encompass all these discussions. The RTP Checklist should be updated to ensure it captures the full discussion around highways and interregional connectivity.

28j

## RTP Checklist

- Please add the Final RTP Checklist to the Appendices of the Final RTP preferably Appendix J.

28k

## Programming/Operations

- Appendix I – Performance Measures should also be identified in the RTP Checklist as meeting the requirement for identifying the objective criteria used for measuring the performance of the transportation system.

### Freight Comments

- On page 194 in the references section you have cited the older California Freight Mobility Plan from 2014. Can you please site the newest March 2020 California Freight Mobility Plan (CFMP) in the Final RTP?  
<https://dot.ca.gov/programs/transportation-planning/freight-planning/ca-freight-advisory-committee/cfmp-2020>

28l

### Travel Demand Model

- Please provide the current TRPA Travel Demand Modeling files to Alex Padilla at District 3 for review.

28m

### RTP Page Numbers

- The RTP without appendices and RTP with appendices has differences in the page numbers. This makes reviewing the RTP Plan Checklist challenging since there is not a consistency in the page numbers between the two documents. Please make the page numbers consistent.

28n

### Missing Caltrans & State Highway Projects - RTP Project List - Appendix B

Caltrans would like to ensure all the programmed projects in the region are included in the RTP and the RTP's Financial Plan. We have included a list of projects that need to be added into the Final RTP's project list in Appendix B and the Financial Plan.

28o

- Please add the US 50 South Lake Tahoe Safety Project into the Final RTP project list in Appendix B and the Financial Plan. This Caltrans project was approved into the 2020 SHOPP program and approved into the 2019 FTIP amendment #8 in July 2020.
  - US 50 In South Lake Tahoe from SR 89 to Park Avenue. Install lighting, pedestrian signals at mid-block crossings, signs, and green bike lane treatment to improve safety for pedestrian and bicyclists.
- Please add the SR 89/Fanny Bridge Community Revitalization Project Phase 2 into the Final RTP project list in Appendix B and Financial Plan. This project is included in the Interactive Project Map on the RTP website but should also be included in the Final RTP project list and Financial Plan especially with the with issues the Central Federal Lands Division has been having with their current contractor.
- Please add Placer County's SR 28 Roadway Safety Audit-Grove Street Project into the Final RTP project list and Financial Plan. This project is a programmed project undergoing Caltrans review.
  - SR 28 pedestrian and bicycling project at Grove Street in Tahoe City.

- Please add Placer County's SR 28 Gateway to Kings Beach Project into the Final RTP Project list and Financial Plan. This project is a programmed project undergoing Caltrans review.
  - SR 28 in Kings Beach from SR 267 to Chipmunk St. Install curb, gutters, sidewalk, signal and drain.

If you are interested, we can schedule a meeting with District 3 and Headquarters to review and discuss any of our comments. Please contact Alex Padilla for any specific questions regarding these comments or require additional information via email to [alex.padilla@dot.ca.gov](mailto:alex.padilla@dot.ca.gov).

Sincerely,

*Alexander Fong*

*For*

Sukhvinder Takhar, Deputy District Director  
Division of Planning, Local Assistance, & Sustainability  
California Department of Transportation - District 3

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 3  
703 B STREET  
MARYSVILLE, CA 95901  
PHONE (530) 741-4286  
TTY 711  
www.dot.ca.gov/dist3



*Making Conservation  
a California Way of Life.*

October 22, 2020

Rebecca Cremeen  
Acting Senior Planner  
Tahoe Regional Planning Agency (TRPA)  
P.O. Box 5310  
Stateline, NV 89449

**Draft Tahoe 2020 Regional Transportation Plan/Sustainable Community Strategies – Initial Study/Mitigated Negative Declaration Document – Caltrans Comments**

Dear Ms. Cremeen:

Thank you for allowing the California Department of Transportation the opportunity to review and comment on the Draft Tahoe 2020 Initial Study and Mitigated Negative Declaration document. Our review concluded that the document will require additional elements and clarifications to meet state and federal requirements. We would like to offer the comments below to assist in the development of the document.

- Caltrans sent a Comment Letter dated October 22 to TRPA on the Draft Tahoe 2020 RTP/SCS. Caltrans requested TRPA to add 4 new transportation projects into the Final 2040 RTP. These projects are either Caltrans lead agency projects or are local agency projects on the State Highway.
- Please add the following programmed new 2040 RTP Projects in the Final RTP MND document. It is important the RTP environmental document is consistent with the Final 2040 RTP project list in Appendix B.
- Please add the SR 50 South Lake Tahoe Safety Project into the Final RTP project list in Appendix B and the Financial Plan. This Caltrans project was approved into the 2020 SHOPP program and approved into the 2019 FTIP amendment #8 in July 2020.
  - SR 50 In South Lake Tahoe from SR 89 to Park Avenue. Install lighting, pedestrian signals at mid-block crossings, signs, and green bike lane treatment to improve safety for pedestrian and bicyclists.
- Please add the SR 89/Fanny Bridge Community Revitalization Project Phase 2 into the Final RTP project list in Appendix B and Financial Plan. This project is included in the Interactive Project Map on the RTP website but should also be included in the Final RTP project list and Financial Plan especially with the with issues the Central Federal Lands Division has been having with their current contractor.



- Please add Placer County's SR 28 Roadway Safety Audit-Grove Street Project into the Final RTP project list and Financial Plan. This project is a programmed project undergoing Caltrans review.
  - SR 28 pedestrian and bicycling project at Grove Street in Tahoe City.
- Please add Placer County's SR 28 Gateway to Kings Beach Project into the Final RTP Project list and Financial Plan. This project is a programmed project undergoing Caltrans review.
  - SR 28 in Kings Beach from SR 267 to Chipmunk St. Install curb, gutters, sidewalk, signal and drain.
- Please ensure all the new transportation projects not included in Draft RTP but are added into the Final RTP are also included and analyzed in the Final RTP IS/MND document.

If you have any questions regarding these comments or require additional information, please contact Alex Padilla, via email to [alex.padilla@dot.ca.gov](mailto:alex.padilla@dot.ca.gov).

Sincerely,



KEVIN YOUNT, Branch Chief  
Office of Transportation Planning  
Regional Planning Branch—East

**TO: TRPA - Attention Rebecca Cremeen**

**FROM: Lorie & Paul Cress 5250 West Lake Blvd, Homewood, Ca**

**We are homeowners on the west shore of Lake Tahoe. We have been advised and are very concerned with TRPA's proposal to eliminate the existing VMT standard, which places a total cap on VMT in the basin, and replace it with a different standard that is based on the VMT driven per person ("per capita"). If this change is approved, VMT could continue to increase in the basin as the number of vehicles in the basin increases, even if each person drives less such that the per capita standard is met. Not only does increased VMT mean more uncontrolled traffic and additional environmental impacts, but it also further threatens public health and safety.**

- **The proposed replacement of the existing capacity-based VMT standard with only a GHG-based VMT standard would allow traffic in the Basin to increase *without any capacity limits*.**
  - o **Uncapped VMT growth would result in negative impacts to other thresholds, including water quality.**
  - o **Uncapped VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation).**
- **The RTP does not adequately address traffic associated with visitors, especially day-only visitors.**
- **The RTP fails to identify adequate funding and continues to place the heaviest burden on residents despite the greatest impacts coming from visitors.**
- **The environmental checklist fails to incorporate the most recent information about environmental, economic, and public health and safety conditions, as required by California law (CEQA).**
- **The proposal to rely on "Annual Average" VMT rather than a maximum daily VMT fails to account for significant impacts of traffic during peak periods, resulting in potentially fatal consequences associated with emergency evacuation and access.**
- **Allowing more cars into the basin will result in less evacuation solutions. This past summer with the thousands of more people coming into the basin, the likelihood of all of us escaping a horrific fire, like we have seen throughout California, would be impossible. The forests both state and federal are in terrible condition. Walking behind our homes in Homewood is shocking. One bolt of lightening would explode with all the dead trees, fallen branches and fallen trees that cover the ground. A match from a campfire, cigarette or bolt of lightening would be uncontrollable. We all would perish and you want more people on the roads? What happened to TRPA's vision to Save Lake Tahoe?**

## Scott Carey

---

**From:** NevadaClearinghouse  
**To:** Sue Gaskill  
**Subject:** RE: Nevada State Clearinghouse Notice E2021-062 (E2021-062 NOTICE TRPA 2020 Linking Tahoe RTP SCS - Carson City, Washoe, and Douglas Counties)

**From:** Sue Gaskill <sgaskill@water.nv.gov>  
**Sent:** Wednesday, September 30, 2020 12:34 PM  
**To:** Amanda Brownlee <abrownlee@water.nv.gov>; NevadaClearinghouse <NevadaClearinghouse@lands.nv.gov>  
**Cc:** Chris Thorson <cthorsen@water.nv.gov>; Thomas Pyeatte <tpyeatte@water.nv.gov>  
**Subject:** RE: Nevada State Clearinghouse Notice E2021-062 (E2021-062 NOTICE TRPA 2020 Linking Tahoe RTP SCS - Carson City, Washoe, and Douglas Counties)

### NEVADA STATE CLEARINGHOUSE

Department of Conservation and Natural Resources, Division of State Lands  
901 S. Stewart St., Ste. 5003, Carson City, Nevada 89701-5246  
(775) 684-2723 Fax (775) 684-2721

TRANSMISSION DATE: 09/10/2020

Tahoe Regional Planning Agency

### Nevada State Clearinghouse Notice E2021-062

#### **Project: E2021-062 NOTICE TRPA 2020 Linking Tahoe RTP SCS - Carson City, Washoe, and Douglas Counties**

The 2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy (RTP/SCS) is the transportation element of the Lake Tahoe Regional Plan. Every four years, TRPA prepares a regional transportation plan that outlines the overall vision for developing, operating, and maintaining the Lake Tahoe Region transportation system. This 2020 RTP/SCS builds from the 2017 RTP/SCS to offer creative strategies that offset transportation impacts, including micro-mobility strategies such as e-bikes and e-scooters and new or enhanced inter-regional transit service.

The 2020 RTP/SCS goals carry over from the 2017 RTP/SCS and are organized around addressing the local community and Tahoe visitor's transportation needs while they meet state and federal planning and reporting requirements. In addition, the 2020 RTP/SCS transportation improvements project list is an update of the 2017 RTP/SCS project list. As such it removes projects completed since 2017, modifies some projects that remain on the list, and adds approximately 45 new minor projects to the list. For additional information and to view project documents please visit <https://www.trpa.org/document/projects-plans/>. Comments due to the Clearinghouse on October 23, 2020.

Follow the link below to find information concerning the above-mentioned project for your review and comment.

[E2021-062 - http://clearinghouse.nv.gov/public/Notice/2021/E2021-062.pdf](http://clearinghouse.nv.gov/public/Notice/2021/E2021-062.pdf)

- **Please evaluate this project's effects on your agency's plans and programs and any other issues that you are aware of that might be pertinent to applicable laws and regulations.**
- **Please reply directly from this e-mail and attach your comments.**

- **Please submit your comments no later than Friday October 23rd, 2020.**

[Clearinghouse project archive](#)

Questions? Scott Carey, Program Manager, (775) 684-2723 or [nevadaclearinghouse@state.nv.us](mailto:nevadaclearinghouse@state.nv.us)

No comment on this project  Proposal supported as written

AGENCY COMMENTS:

**Nevada State Clearinghouse**

*Department of Conservation and Natural Resources*

*901 South Stewart Street, Suite 5003*

*Carson City, NV 89701*

*775-684-2723*

<http://clearinghouse.nv.gov>

[www.lands.nv.gov](http://www.lands.nv.gov)

DATE: September 30, 2020

Division of Water Resources

**Nevada SAI # E2021-062**

**Project: E2021-062 NOTICE TRPA 2020 Linking Tahoe RTP SCS - Carson City, Washoe, and Douglas Counties**

No comment on this project  Proposal supported as written

AGENCY COMMENTS:

**General:**

All Nevada water laws must receive full compliance.

No use of any water required in support of this project, from any source, is allowed without the benefit of a permit or waiver issued by the Nevada Division of Water Resources.

**Water for Construction Projects**

Ensure that any water used on a project for any use shall be provided by an established utility or under permit or temporary change application or waiver issued by the State Engineer's Office with a manner of use acceptable for suggested projects water needs.

## Kira Smith

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**From:** Dana Schneider <danafschneider@gmail.com>  
**Sent:** Friday, October 23, 2020 9:05 AM  
**To:** Rebecca Cremeen  
**Subject:** TRPA - Attn: Rebecca Cremeen

Dear Ms. Cremeen,

I am very concerned with TRPA's proposal to eliminate the existing VMT standard, which places a total cap on VMT in the basin, and replace it with a different standard that is based on the VMT driven per person ("per capita"). If this change is approved, VMT could continue to increase in the basin as the number of vehicles in the basin increases, even if each person drives less such that the per capita standard is met. Not only does increased VMT mean more uncontrolled traffic and additional environmental impacts, but it also further threatens public health and safety.

- The proposed replacement of the existing capacity-based VMT standard with only a GHG-based VMT standard would allow traffic in the Basin to increase *without any capacity limits*.
  - o Uncapped VMT growth would result in negative impacts to other thresholds, including water quality.
  - o Uncapped VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation).
- The RTP does not adequately address traffic associated with visitors, especially day-only visitors.
- The RTP fails to identify adequate funding and continues to place the heaviest burden on residents despite the greatest impacts coming from visitors.
- The environmental checklist fails to incorporate the most recent information about environmental, economic, and public health and safety conditions, as required by California law (CEQA).
- The proposal to rely on "Annual Average" VMT rather than a maximum daily VMT fails to account for significant impacts of traffic during peak periods, resulting in potentially fatal consequences associated with emergency evacuation and access.

It is also important to make the following points to be included in the record:

- The RTP and its relationship to the existing TRPA VMT standard is confusing and it is unclear how the Initial Study is judging the significance of the VMT impacts.
- The RTP policies and TRPA statements indicate that TRPA is "giving up" on controlling visitor traffic in the region, but isn't that what a regional planning agency is supposed to do?

Thank you for your attention to this matter,

Dana Schneider

482 Sweetwater Drive

Tahoma, Ca.

707-696-0635

--

Dana Schneider LMFT  
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Mailing address  
125 South Main Street #194  
Sebastopol, CA. 95472

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408 Broad Street, Suite 12  
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530.265.2849  
[www.sierrawatch.org](http://www.sierrawatch.org)

October 22, 2020

Rebecca Cremeen  
Tahoe Regional Planning Agency  
PO Box 5310  
Stateline, NV 89449

Subject: Draft 2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy

Dear Ms. Cremeen:

Sierra Watch works to protect the natural resources and the timeless values of our mountains. Specifically, we are engaged in long-term commitments to ensure sound planning for places like Martis Valley and Squaw Valley – on the edge of the Tahoe Basin – so that land use decision-making outside of Tahoe does not threaten the Basin itself.

We write today to encourage TRPA to maintain a robust capacity-based “absolute” standard for Vehicle Miles Travelled (VMT) and develop a Regional Transportation Plan that meets the standard. Such a standard can help TRPA protect lake clarity, promote public safety, and acknowledge the real-world impacts of traffic generated outside of the Basin.

As TRPA acknowledges, traffic in the Basin is not the culprit it once was yet is still a threat to lake clarity, mostly due to deposition of nitrogen and fine sediment. And the best way to measure that impact is VMT.

As TRPA acknowledges, traffic in the Basin is not the culprit it once was yet is still a threat to lake clarity, mostly due to fine sediment. And the best way to measure vehicular cause is VMT.

VMT can also be an important tool in measuring the growing threat of wildfire and its challenge to public safety. Because, when it's time to evacuate the Basin, what will matter is the total number of cars that need to get out – not where they came from.

Maintaining a capacity-based standard for VMT can also help TRPA better understand impacts of trips generated outside of the Basin. Although TRPA lacks land-use decision-making authority past the rim of the Basin, traffic knows no such boundaries. The better we can understand how much VMT are being added to the Basin's limited capacity, the better job TRPA can do protect lake clarity and public safety – as well as inform its own land use decisions. Ignoring those trips would be like a restaurant owner planning to feed only the customers who already in the restaurant – without planning for the crowds that will come through the doors.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tom Mooers", written over a horizontal line.

Tom Mooers  
Executive Director



## Michelle Glickert

---

**From:** Costa, Mark <mcosta@dot.nv.gov>  
**Sent:** Friday, October 23, 2020 3:29 PM  
**To:** Michelle Glickert  
**Cc:** Rosenberg, Sondra; Verre, Kevin; Story, William; Hobdy, Guinevere  
**Subject:** Resent NDOT TRPA RTP Comments  
**Attachments:** Draftlist\_NDOT\_Review\_10-15-2020.xlsx

**Importance:** High

Good Afternoon Michelle,

Below are NDOT's comments concerning the TRPA RTP. We would also like to discuss them with TMPO and TTD as a follow up to our previous discussion of October 12<sup>th</sup>.

Attached is a draft of NDOT's review of the projects and there are concerns about years associated with the funding which should be discussed with TRPA. Specific NDOT comments to the projects are in the far-right column.

The SR 28 project financial plan provided by TTD does not align with the TIP. Nor does the construction schedule in either the SR 28 project financial plan or the TIP extend the period to align with expected revenues. This issue was discussed at the October 12<sup>th</sup> meeting with NDOT, TMPO and TTD. Illustrating the longer construction period, approximately 10 to 20 years beyond the STIP time frame, is needed to get PE funding for this project to be approved. This topic may be included in the follow up meeting mentioned at the top of this email.

The RTP has six goals with many policies for each one with various focus areas. It would be helpful for ease of reference and to trace the efforts to reach goals to cross reference the long project list of Appendix B with a column listing the goal(s) being addressed and a second column with the goal policy number. The relationship between the many projects undertaken by different entities and how they complement or detract from each other would be more evident.

Revenue projects are generally based on a 2% increase per year or a historical apportionment or distributions. Showing at least some of the calculations on how future revenues would be helpful, instead of just stating the numbers. The intent is not to make the plan narrative overly complicated but show how the projected funding is estimated. Or perhaps, charts showing the slope of the funding by year would make the calculations more transparent.

On page 159 the local source of Farebox Bus Revenue is at a much higher increase with \$95,583,109 generated during 2036-2045 but only \$5,985,310 received during 2026-2035, the prior ten-year period. The increase is more than fifteen-fold and needs an explanation or a correction. The other local sources appear to be much closer to the expected amount. But if the Farebox Bus Revenue is incorrect than the Total Local Sources will also need to be changed.

Thank you for the opportunity to comment and NDOT is looking forward to resolving these remaining questions.

Mark Costa  
Multi-modal Program Development Chief  
Nevada Department of Transportation  
1263 S. Stewart Street  
Carson City, NV 89712

Office: 775-888-7120

[mcosta@dot.nv.gov](mailto:mcosta@dot.nv.gov)

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October 23, 2020

Rebecca Cremeen  
Acting Senior Planner  
Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, Nevada 89449  
(Via email to [rcremeen@trpa.org](mailto:rcremeen@trpa.org))

**RE: Comments on the IS/IEC for the 2020 RTP/SCS**

Dear Rebecca:

The California Attorney Generals' Office, with the assistance of transportation planners at Fehr & Peers, has reviewed the 2020 Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS" or "Plan") and the corresponding Initial Study/Mitigated Negative Declaration and Initial Environmental Checklist/Mitigated Finding of No Significant Effect ("IS/IEC") and respectfully submits the following comments. The Attorney General submits these comments pursuant to his independent authority under the California Constitution, common law, and statutes to represent the public interest. Along with other State agencies, the Attorney General has the power to protect the natural resources of the State from pollution, impairment, or destruction. (See CAL. CONST. art. V, § 13; Cal. Gov. Code, §§ 12511, 12600-12; *D'Amico v. Bd. of Medical Examiners*, 11 Cal. 3d 1, 14-15 (1974)). These comments are made on behalf of the Attorney General and not on behalf of any other California agency or office.

The California Attorney General has a longstanding interest in the protection of Lake Tahoe as a state and national treasure. The Attorney General's interest in Lake Tahoe matters dates back over four decades,<sup>1</sup> and is as recent as our involvement in the Tahoe Regional Planning Agency's ("TRPA") shoreline plan amendments, the US 50/South Shore Community Revitalization Project, the Tahoe South Events Center Project, and current planning efforts regarding the region's vehicle miles traveled ("VMT") threshold and updates to TRPA's transportation model.

Here, our comments focus on the adequacy of the VMT and GHG impact analyses in the IS/IEC for the 2020 RTP/SCS (released for public review on September 10, 2020). At the outset,

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<sup>1</sup> See, e.g., *People of State of Cal. ex Rel. Younger v. Tahoe Regional Planning Agency*, 516 F.2d 215 (9th Cir. 1975).

and as will be detailed below, it must be underscored that the IS/IEC's analysis of VMT is convoluted, confusing, and internally inconsistent.<sup>2</sup> The IS/IEC provides data indicating that with implementation of the Plan, VMT will increase. (See e.g., IS/IEC, p. 200 [noting that with the Plan VMT increases by 16,208 over existing]). At the same time, the IS/IEC concludes that the 2020 RTP/SCS will generate no new net VMT in the Tahoe Basin and that it will actually decrease VMT. (See e.g., IS/IEC, p. 201). On this basis, the IS/IEC concludes that the RTP/SCS has a less than significant impact on VMT and does not require any mitigation. (IS/IEC, p. 202). This conclusion is inconsistent with the data provided.

At the heart of this inconsistency, appears to be an attempt to distinguish the Plan's impact on VMT from the VMT that will be generated, not by the Plan itself, but by visitor and population growth over the RTP/SCS's planning horizon (2045). (See IS/IEC, p. 200 ["[i]n other words, the beneficial effects of the 2020 RTP would not completely offset VMT generated by anticipated population and visitation growth"]). While this distinction may be meaningful in the context of evaluating a particular project, it is not meaningful in the context of the regional transportation plan. The RTP/SCS is the precise place where TRPA should and must plan for and address the travel behaviors that will impact the region over the course of the planning horizon. The RTP, is the *Regional Transportation Plan* – it is required to account for travel in the region! (See 2017 Regional Transportation Plan Guidelines for Metropolitan Planning Organizations, CTC, 2017, p. 4). If, with implementation of the Plan, VMT increases in the region, the Plan is not excused from responsibility for that increase.

The IS/IEC's conclusion that the VMT and GHG impacts of the Plan are less than significant is not supported by substantial evidence and flawed in many additional respects. First, the RTP/SCS does not meet or achieve TRPA's existing environmental threshold for VMT. Second, the IS/IEC does not appropriately analyze the RTP/SCS's VMT impacts. Third, the IS/IEC fails to conclude that VMT is a significant impact that requires mitigation. In addition, the IS/IEC fails to substantiate the RTP/SCS's compliance with CARB's required GHG reductions. Last, the IS/IEC's VMT analysis relies on reductions calculated through the Trip Reduction Impact Analysis (TRIA) tool,<sup>3</sup> but these reductions are not adequately explained, quantified, or substantiated. We appreciate your consideration of our comments and respectfully request that TRPA address the issues outlined herein before the RTP/SCS is considered for adoption.

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<sup>2</sup> The IS/IEC contains internal inconsistencies that undermine its analytical integrity, such as contradictory statements about the VMT impact of the RTP/SCS and inconsistent values for the basinwide VMT threshold. Some sections of the IS/IEC are so difficult to read and comprehend that the document cannot reasonably be said to satisfy CEQA's public disclosure requirements (see, e.g., pp. 200-202).

<sup>3</sup> The TRIA tool is a spreadsheet tool that calculates vehicle trip and VMT reductions for various transportation policies, projects, and programs that were not fully accounted for in the TRPA travel demand model.

**I. The RTP/SCS does not meet or achieve TRPA’s existing environmental threshold for VMT.**

The Regional Plan establishes a VMT threshold of 10 percent below 1981 levels. (TRPA Threshold Standards, p. 10; see also TRPA Resolution 82-11, p. B-10). TRPA presently estimates the numeric value of that limit to be 1,298,987 daily VMT. (IS/IEC, p. 200).<sup>4</sup> The RTPS/SCS and the IS/IEC confirm that the basin is currently in exceedance of the threshold limit with daily VMT of 1,393,994 in 2018. (*Ibid.*).<sup>5</sup> The RTP/SCS will not reduce existing basinwide VMT to below the threshold. Rather, with implementation of the RTP, basinwide daily VMT is forecasted to increase by 1.2% by 2045 and to exceed the threshold standard. (IS/IEC, p. 200). Importantly, VMT is forecasted to have a much greater increase absent the reductions that have been modeled using the Trip Reduction Impact Analysis (“TRIA”) tool. Without these reductions, daily basinwide VMT would increase 8% above existing levels and 15% above the threshold—to 1,505,533 daily basinwide VMT—in 2045. (IS/IEC, p. 200). As discussed in detail below, the TRIA reductions are unsubstantiated and likely over-stated.

A summary of the relevant VMT values as reported in the IS/IEC is as follows:

|  |           |
|--|-----------|
| VMT Threshold:                               | 1,298,987 |
| Existing VMT:                                | 1,393,994 |
| VMT forecast for 2035 with RTP:              | 1,388,320 |
| VMT forecast for 2045 with RTP and TRIA:     | 1,410,202 |
| VMT forecast for 2045 with RTP without TRIA: | 1,505,533 |

Acknowledging that the RTP/SCS will not achieve and maintain the existing VMT threshold and therefore cannot be approved by TRPA because TRPA would not be able to make the required findings, the IS/IEC explains that TRPA intends to amend the existing threshold at the same meeting where it considers approving the RTP/SCS. (IS/IEC, p. 197).<sup>6</sup> In other words,

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<sup>4</sup> The Executive Summary of the RTP/SCS sets forth a different threshold value, (RTP/SCS, p. ES-19 [stating the threshold is 1,303,301]), but later uses a figure consistent with the IS/IEC. (RTP/SCS, p. 109 [stating the threshold is 1,298,987]).

<sup>5</sup> The RTP/SCS again sets forth different values for existing VMT in 2018. (RTP/SCS, p. ES-19 and 109 [stating existing (2018) VMT is 1,398,994]).

<sup>6</sup> As the IS/MND explains, “TRPA is developing a metric promoting VMT reductions per capita to meet the GHG objectives of both California and Nevada.” (IS/IEC, p. 197). While we appreciate the ongoing effort to update the threshold and support utilization of a VMT per capita standard for GHG purposes, in line with what has been implemented in California, we remain hopeful that TRPA will retain an absolute basinwide VMT limit to address the broader range of

the IS/IEC assumes that TRPA will move the goalposts: the RTP/SCS at present does not meet the requirements for VMT in the region, so TRPA plans to weaken those requirements so that the Plan can be approved. While a threshold amendment may be forthcoming,<sup>7</sup> the proposed RTP/SCS does not meet the environmental objectives for the basin as they exist today. This is particularly concerning given the important nexus between VMT and other environmental impacts (e.g., noise, dust, pedestrian safety, etc.). It is even more concerning, given the reliance on the TRIA reductions, which are unsubstantiated and rely on unfunded projects, for which there is no guarantee of, or requirement for, implementation.

## II. The IS/IEC's VMT impact analysis is flawed.

### A. *The IS/IEC erroneously concludes that the RTP does not have a significant VMT impact.*

The IS/IEC appears to analyze the VMT impact of the RTP/SCS pursuant to a net zero VMT standard. The IS/IEC states that it “analyzes any VMT related impacts as set forth in TRPA’s 2019 Interim Guidance for assessing the impact of development projects and plans,” and that, “[u]nder the Interim Guidance, a project or plan would not cause a significant impact if the action does not produce any unmitigated VMT.” (IS/IEC, p. 197). The document appears to use this standard to evaluate the RTP/SCS’s VMT impact for purposes of environmental review under both CEQA and the Compact.

Applying this standard, the IS/IEC mistakenly concludes that the RTP/SCS results in a net reduction in VMT and thus has a less than significant impact. It claims that “strategies included in the 2020 RTP/SCS result in a net reduction in VMT by approximately six percent.” (IS/IEC, p. 200). This claim is inconsistent with the data presented in the IS/IEC. According to the IS/IEC, existing VMT in the basin is 1,393,994. The IS/IEC forecasts that VMT in the basin will increase to 1,410,202 by 2045 with the implementation of the RTP (after TRIA reductions).<sup>8</sup> This change constitutes a 1.2 percent increase in VMT from existing levels. This increase in VMT is not mitigated. Given this net increase in VMT, it is plainly false to conclude, as the IS/IEC does, that

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environmental impacts associated with VMT. Indeed, the Regional Plan Implementation Committee’s (RPIC) direction in March, 2020, directed staff to update the threshold so as to define “the level of regional VMT and VMT reductions that TRPA is then committed to managing and planning for at both the regional and project level.” (RPIC, VMT Threshold Update Staff Report (March 18, 2020), p. 1 [motion]). A VMT per capita standard alone, particularly if only applied prospectively, would not meet this defined objective.

<sup>7</sup> We note that TRPA has convened a group of stakeholders, the Technical Transportation Advisory Committee (TTAC), to develop recommendations for an amended threshold. The work of the TTAC is not yet complete—there is another TTAC meeting planned for November—so the outcome of that process is not yet known, nor has the Governing Board considered or approved an amended threshold.

<sup>8</sup> As noted, the TRIA reductions are likely overstated in the IS/IEC.

the RTP/SCS does not produce any unmitigated VMT. Under the IS/IEC's own net zero standard, this net increase in VMT constitutes a significant impact that has not been identified or mitigated. The environmental document should be revised to correct this analytical error, identify this significant impact, and add mitigation measures to address this impact. Once this occurs, TRPA will need to recirculate the document for another round of review and comment. (See 14 Cal. Code Regs., § 15073.5 [noting that "[a] lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has previously been given"]).<sup>9</sup>

Our analysis of the data presented in the IS/IEC indicates that TRPA likely derived the claimed six percent reduction in VMT by comparing the VMT impact of the RTP/SCS before accounting for TRIA reductions with the VMT impact of the RTP/SCS after accounting for TRIA reductions. Before accounting for TRIA reductions, basinwide VMT is forecasted to be 1,505,533 in 2045 with the implementation of the RTP/SCS. After accounting for TRIA reductions, basinwide VMT is forecasted to be 1,410,202 in 2045 with the implementation of the RTP/SCS. As such, application of the TRIA reductions is expected to lead to approximately a six percent reduction in the VMT forecasted to exist in the basin in 2045 under the RTP/SCS compared to the pre-TRIA level. The reduction achieved under the Plan as a result of TRIA is conceptually distinct from a *net reduction in VMT*, which would describe a circumstance where the VMT forecasted to exist in the basin in 2045 would be *lower than existing conditions*. The fact that the TRIA reductions lessen the severity of the VMT impact does not mean that the RTP/SCS itself results in net zero VMT or has a beneficial impact on VMT. As discussed above, with implementation of the RTP/SCS, there will plainly be unmitigated net positive VMT, which constitutes a significant impact under the IS/IEC's own standard of significance.

*B. The IS/IEC's use of the net zero standard as the standard of significance is inappropriate.*

In addition to the IS/IEC's faulty application of the net zero standard of significance, its use of net zero as a threshold of significance in the first instance likely violates CEQA. While lead agencies have the discretion to select thresholds of significance, "[t]hresholds of significance to be adopted for general use as part of the lead agency's environmental review process must be adopted by ordinance, resolution, rule, or regulation, and developed through a public review process and be supported by substantial evidence." (14 Cal. Code Regs., § 15064.7(b)). The net zero standard purportedly set forth in the interim guidance and then used in the IS/IEC does not meet any of these criteria.<sup>10</sup>

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<sup>9</sup> We note that other impact analyses in the IS/IEC are premised on the flawed VMT analysis (e.g., the GHG, energy, and air quality sections) and likewise need to be revised.

<sup>10</sup> Thresholds of significance can also be established on a case by case basis, but here it appears the threshold, purportedly established through the interim guidance, is one of general use.

First, the net zero standard has not been adopted by formal action pursuant to a public process. The guidance document that TRPA relies upon to establish the net zero standard was developed solely at a staff level and has not been formally adopted by the Governing Board. TRPA nonetheless relies on this guidance document to generally guide VMT impact analysis for proposed projects while it updates the basin's VMT threshold standard. (TRPA, Guidance for Assessment of Vehicle Miles Traveled (VMT) Impacts of Projects in the Tahoe Basin (April 14, 2020), p.1 [“[t]his guidance is the required methodology for project- and plan-level analysis during the period in which TRPA is updating and validating its transportation model and updating the VMT Threshold Standard”]). Second, the guidance document does not indicate that the net zero standard will be used as a standard of significance for environmental review. As a result, even those who commented on the guidance document, including our office, were not commenting on the propriety of using net zero as the standard of significance for transportation impacts in environmental review. Rather, we understood the interim guidance to be providing direction to project proponents on the appropriate methodologies for quantifying VMT while the model and threshold updates are pending. Third, the guidance document does not clearly establish the net zero standard, let alone indicate that it will be used in lieu of the existing threshold for determining significant impacts for purposes of environmental review. While use of a net zero standard for purposes of determining significant impacts is a rigorous standard, it is not as rigorous as applying the existing VMT threshold, which would result in a significant impact if the Plan failed to *reduce* VMT to meet the threshold. Given the existence of the long-standing basinwide threshold carrying capacity for VMT that was adopted pursuant to a public process, it is unclear why TRPA is using, in lieu of that standard, an unofficial threshold of significance that has not been appropriately adopted, nor established as an adequate substitute for the existing threshold carrying capacity TRPA has adopted for the basin.

*C. The IS/IEC inappropriately tiers off of the 2012 RTP/SCS Regional Plan Update EIR/EIS.*

The 2020 RTP/SCS IS/IEC tiers off of the 2012 RTP/SCS Regional Plan Update EIR/EIS (IS/IEC, p. 5), but that analysis utilized the existing VMT threshold standard as the standard of significance and a different base year for calculating the threshold (2010 versus 2018) (2012 Regional Plan Update Draft EIS, 3.3-19 and 3.3-39).<sup>11</sup> As a result, reliance on that analysis is of limited utility. In addition, the IS/IEC plainly discloses for the first time that the mitigation relied upon in 2012 (and 2017)—limiting the release of new allocations—“would not be enough to reduce VMT below the TRPA threshold.” (IS/IEC, p. 201). This is new information that meets CEQA's standard for requiring preparation of a new EIR and accordingly, prevents TRPA from tiering from the prior 2012 EIR/EIS. (See Public Resources Code § 21094(b)(3) and § 21166(c); 14 Cal. Code of Regulations § 15162(a)(3)). Further, the 2020 RTP includes a different project list than was adopted in 2012. In particular, the 2020 RTP removes certain projects that had been on the constrained (meaning funded) project list and includes them on the unconstrained (meaning unfunded) project list. Because of these differences in the actions that will be completed under

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<sup>11</sup> The links to the 2012 EIS for the RPU/RTP are disabled on TRPA's 2020 RTP/SCS webpage. (<https://www.trpa.org/regional-plan/regional-transportation-plan/>).



the Plan, the IS/IEC for the 2020 RTP may not be able to rely on the analysis that was done for the 2012 RTP. (Pub. Res. Code § 21094(b)(1)).

**III. The IS/IEC should conclude that VMT is a significant impact and include appropriate mitigation measures.**

Under either the net zero standard or the existing VMT Threshold standard, the RTP/SCS's impact on VMT, based on TRPA's own analysis, is significant. The IS/IEC should identify the impact as such and provide appropriate mitigation.

In 2012 and 2017, TRPA concluded that the RTP's impact on VMT would be significant. The RTP/SCS therefore included mitigation to reduce those impacts to less than significant. The mitigation included in the 2012 and 2017 RTP/SCS— limiting the release of new allocations— has not proven adequate as the threshold standard is still not in attainment. (IS/IEC, p. 201). The IS/IEC also indicates that these measures have only a nominal impact on VMT. (*Ibid.* [explaining that the savings associated with the withholding of residential allocations between now and 2045 would be 40,000-50,000 VMT, and that the withholding of Commercial Floor Area and Tourist Accommodation Units would reduce another 25,000-35,000 VMT]). Because of this, as well as the other challenges TRPA would face in limiting visitors to or population within the basin, the IS/IEC concludes that TRPA “has limited levers to control the exogenous VMT generation that primarily drives the nonattainment status of the threshold.” (IS/IEC, p. 201).<sup>12</sup>

The IS/IEC fails, however, to explain why TRPA is not using the levers it does have to influence these exogenous variables. The IS/IEC should discuss the options that TRPA could utilize to influence travel behaviors related to driving in the basin including measures like parking pricing and increased transit. TRPA could also consider the development of a VMT retrofit program akin to its BMP retrofit program or wood strove retrofit program, whereby existing developments would be required to demonstrate some level of contribution to VMT reducing strategies (e.g., enhanced accessibility of non-auto mode options for travel or charges for paid parking). Without a more thorough investigation and disclosure of methods that TRPA could employ to manage VMT in the basin, the IS/IEC's conclusion that increases in VMT are unavoidable should not be accepted.

**IV. The IS/IEC does not substantiate the RTP/SCS's compliance with CARB's required GHG reductions.**

The IS/IEC appropriately considers the Plan's compliance with CARB's GHG reduction targets to be achieved from passenger vehicles by 2020 and 2035 in order to meet California's climate goals per SB 375 and AB 32. (IS/IEC, p. 117). The applicable targets for the basin are an

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<sup>12</sup> This is a departure from the views TRPA expressed in 2012. (2012 Regional Plan Update Draft EIS, 3.3-19 [“It [VMT] is relatively easy to measure, bears a direct relationship to vehicle emissions, is generally correlated with congestion, and can be influenced by policymakers in a number of different ways”]).

8 percent reduction in GHG emissions from per capita passenger vehicles by 2020 and a 5 percent reduction in GHG emissions from per capita passenger vehicles by 2035, relative to 2005 emission levels (*Ibid.*). The IS/IEC indicates that “the 2020 RTP/SCS would result in an approximately 12 percent reduction in per capita CO<sub>2</sub> emissions from passenger vehicles by 2035, which would achieve the mandated five percent reduction under SB 375.” (IS/IEC, p. 125).

While we are pleased to see that the GHG reduction targets are anticipated to be met, documentation supporting that conclusion is inconclusive. For example, Table 25 of the RTP/SCS, which sets forth the Plan’s conformance with the GHG targets, does not contain any details supporting the 8 percent reduction in 2020, nor does Appendix D, the 2020 Regional Transportation Plan Regional Forecast Report, include information substantiating the VMT and GHG reductions forecasted for SB 375 compliance. This lack of substantiation is particularly concerning given that the analysis required for SB 375 compliance is not coextensive with the analysis required for CEQA’s transportation analysis or, historically, for TRPA threshold conformity. For example, SB 375 excludes commercial vehicles and external trips traveling through the basin without stopping. The VMT estimate used for TRPA’s VMT threshold is total VMT in the basin inclusive of trucks and external trips while the VMT estimate used for CEQA’s air quality, energy, and GHG impacts analysis should include total VMT from all vehicles and not truncate trips at the regional boundary. The IS/IEC does not provide data or evidence to demonstrate that appropriate VMT metrics were used in the analysis of CEQA or TRPA impacts. In addition, to the extent there are issues with the underlying VMT analysis, as described in the other sections of this letter, the conclusions of the GHG analysis, as well as the conclusions in the other sections of the IS/IEC that rely upon the VMT analysis (air quality and energy), would likewise be undermined.

Further, the 2020 Draft RTP/SCS and IS/IEC should also discuss the implications of the *2018 Progress Report, California’s Sustainable Communities and Climate Protection Act*, CARB, November 2018, on the VMT/GHG forecasts. This CARB report demonstrates how the RTP/SCS forecasts statewide have consistently overestimated VMT/GHG reductions. We submit that in the context of TRPA’s 2020 RTP/SCS, this is evidence that must also be considered in determining the anticipated significance of VMT and GHG impacts under the 2020 RTP/SCS. (14 Cal. Code of Regulations § 15064(b)(2)).

**V. The IS/IEC’s TRIA reductions are not appropriately explained, guaranteed, or substantiated.**

As explained above, absent the TRIA reductions, the RTP/SCS will have a much greater impact on basinwide VMT—increasing daily VMT by 15% above existing (2018) VMT levels by 2045—than the IS/IEC otherwise predicts. Given the importance of the TRIA reductions to the IS/IEC’s conclusions regarding VMT, it is critical that the TRIA reductions are appropriately disclosed, accurately accounted for and substantiated, and associated with projects that are guaranteed to be implemented. At present, the IS/IEC does not adequately fulfil these functions.

First, the VMT analysis and the TRIA reductions are not described with sufficient clarity to satisfy the disclosure requirements of the IS/IEC. TRPA’s model is used to forecast the Plan’s impact on VMT, while the TRIA tool is used to model reductions associated with aspects of the Plan “that were not directly represented in the model.” (IS/IEC, p. 200). Why some aspects of the plan were included in the model and others were not, is not explained. Is it because some aspects of the Plan are considered mitigation? Even if that is the case, the analysis should use the same methodology for evaluating both the impacts of the Plan and the mitigation. (See *Technical Advisory on Evaluating Transportation Impacts in CEQA*, California Governor’s Office of Planning and Research (December 2018), p. 16). The IS/IEC could and should run the TRIA reductions through the model to provide an apples to apples comparison of the Plan’s impacts with and without the “mitigations” claimed through TRIA. In addition, as a result of the bifurcated analysis, it is unclear what has been addressed via the model versus through the TRIA reductions and it is unclear how specifically the two analyses have been cross walked. For example, in some instances, it appears that ‘trip reduction factors’ derived from research were applied to the TRPA model outputs, but the exact steps and technical details are not disclosed. By further example, the model produces a total VMT estimate inclusive of autos and trucks,<sup>13</sup> but the TRIA adjustments, in most cases by their nature, would only function to reduce auto VMT. The challenges with understanding how these two analyses fit together is further compounded because the results of the analyses are set forth in disparate parts of the IS/IEC and RTP. For example, Table 15 of the IS/IEC summarizes the Plan’s impact on VMT, and reports VMT values that include the TRIA reductions, while the TRIA reductions are only detailed in an appendix to the RTP.

Second, the TRIA reductions appear to be taken across the board regardless of the particular analytical question being asked and answered. As highlighted above, the IS/IEC is required to analyze VMT in several different contexts—for purposes of ensuring compliance with TRPA’s threshold, evaluating air quality, energy, GHG, and transportation impacts under CEQA, and informing the GHG analysis required for SB 375 in California. Each of these requires slightly different inputs—i.e., in basin versus full trip lengths, passenger versus commercial vehicles, and different analysis days (typical weekday versus TRPA’s model that uses a unique combination of summer/early fall days). It is not clear how these differences are accounted for in the IS/IEC and its blanket application of the TRIA reductions across the various analyses.

Third, several of the TRIA reductions assumed in the IS/IEC appear to be associated with projects that are not listed in the constrained 2020 Draft RTP/SCS project list—meaning they are unfunded—nor are they required as mitigation—meaning there is no guarantee they will be implemented. (See 2020 RTP/SCS, p. 99 [‘Unfunded Parts of the Vision’] and Appendix B; 2020

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<sup>13</sup> Note that the model does not separate out freight, which means those trips are assigned incorrectly to other categories (e.g., residents, workers, visitors), but are captured in the total volumes.

IS/IEC, p. 18, Table 1 – New Financially Constrained 2020 RTP/SCS Projects). For example, intercept lots are not listed on the constrained project list and are specifically identified as unfunded (see RTP/SCS, p. 99 and Appendix B), yet they are included as TRIA reductions (see RTP/SCS, p. 252). The same is true for transit projects (see RTP/SCS, pp. 251-252). Other examples are listed below. This is a key concern for the IS/IEC’s significance conclusions regarding VMT.

Fourth, in addition to in some instances being unfunded or not required, many of the TRIA adjustments do not appear to be accurately accounted for or substantiated. The specific research citations for reductions claimed through TRIA are often not provided. Specific issues include the following [see RTP/SCS, pp. 249-259]:

- E-Bikes – Vehicle trip reductions are taken based on e-bike research indicating that riders travel twice as far using an e-bike than a regular bicycle. What evidence is available to substantiate this statement? Further, the TRIA tool increased the bicycle mode split instead of just increasing the length of bicycle trips. No evidence was provided to establish that mode split increases due to e-bike use.
- Shared Micromobility – Vehicle trip reductions are taken for shared mobility services including shared e-scooters and e-bikes. Did the reductions account for e-bike vehicle trip reductions noted above to avoid double counting? Also, are the vehicle trip reductions limited to only the areas where these shared micromobility services are offered? The 2020 Draft RTP/SCS discussion on page 251 states that “[t]he resulting trip reduction factor... is applied to all trips in the Region.”
- 2035 and 2045 Transit Service – Vehicle trip reductions are taken for fixed route transit services that extend outside the basin (2045) and for transit projects not included in the 2020 Draft RTP/SCS constrained project list. Did associated VMT reductions for transit projects extending outside the basin include trip lengths outside the basin?
- Intercept Lots – Vehicle trip reductions are taken for intercept lots that are not directly listed in the 2020 Draft RTP/SCS constrained project list. What evidence substantiates the trip reduction percentages and was the evidence based on a recreational area similar to Tahoe and/or the specific projects contained in the 2020 Draft RTP/SCS?
- Microtransit – Vehicle trip reductions are taken for microtransit service. What evidence substantiates the trip reduction percentages and was the evidence based on a recreational area and the specific projects contained in the 2020 Draft RTP/SCS? Microtransit services are described as being offered in select areas such

as Tahoe City, Kings Beach, and South Lake Tahoe, but the vehicle trip reduction is described on page 252 as “applied to all trips in the Region.” Are the vehicle trip reductions applied to all trips in the Region or limited to the service areas?

- ITS – Vehicle trip reductions are taken from ITS strategies related to improved transit information and coordination. What evidence substantiates the trip reduction percentages and was the evidence based on a recreational area and the specific projects contained in the 2020 Draft RTP/SCS? Were these applied so as to avoid double counting with other reductions already claimed for specific transit projects in the basin?
- TDM – Vehicle trip reductions are taken for ‘assumed’ increases in TDM participation. What evidence was collected about the daily VMT effect of existing TDM strategies? Was it clear that TDM strategies produced a net VMT reduction across the full analysis day? What evidence supports an ‘assumed’ increase in TDM participation rates up to fifty percent? What specific actions will TRPA take to increase participation? Since TDM effectiveness is based on the behavior of future workers and cannot be guaranteed, is it reasonable to take any VMT reduction beyond what can be supported by current VMT reduction evidence for the analysis day?
- Parking Management – Vehicle trip reductions are taken for parking pricing and parking management strategies that are not included in the constrained 2020 Draft RTP/SCS project list. The only parking related projects in the constrained list (Appendix B of the 2020 Draft RTP/SCS) appear to be focused on wayfinding and information. No strategies are listed that would increase the cost of parking or otherwise discourage vehicle travel. What evidence substantiates the trip reduction percentages and was the evidence based on a recreational area and the specific projects contained in the 2020 Draft RTP/SCS? Are the vehicle trip reductions limited to only the areas where new parking management will occur? The 2020 Draft RTP/SCS discussion on page 252 states that “[t]hese trip reductions were then recalculated as a trip reduction factor that is applied to all regional trips (1.2%).” Why would the trip reduction factor be applied to all regional trips? Parking pricing affects one end of a trip. As such, the effect should be limited to travel choices associated with that particular trip end (i.e., destination).

We appreciate your consideration of our comments and respectfully request that these issues be addressed before the RTP/SCS is considered for adoption.

Sincerely,



NICOLE U. RINKE  
SOPHIE A. WENZLAU  
Deputy Attorneys General

For XAVIER BECERRA  
Attorney General

cc: Bill Yeates, TRPA Governing Board Chair  
Joanne Marchetta, TRPA Executive Director  
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Arsenio Mataka, Special Assistant to the Attorney General

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October 23, 2020

Mr. Nick Haven, Long Range Planning & Transportation Division Manager  
Ms. Michelle Glickert, Principal Transportation Planner  
Tahoe Regional Planning Agency  
PO Box 5310  
Stateline, NV 89449

**Re: 2045 Linking Tahoe: Draft Regional Transportation Plan (RTP)**

Dear Nick and Michelle:

We at Tahoe Chamber hope the release of this draft plan propels a true and meaningful public-private partnership to advance to *"needed funding and funding sources to implement transformative projects at Tahoe"* as stated on page ES-4.

As you prepare a final RTP based on comments received, it would be helpful to include a list of the *"Seventeen agencies committed to collaboratively advocate for funds to implement these catalytic projects, including working together to develop new regional revenue sources that are critical to delivery of the Regional Transportation Plan."* (Page ES-4)

The RTP Vision (page 8) is laudable: *"Tahoe's transportation system is interconnected, inter-regional, and sustainable, connecting people and places in ways that reduce reliance on the private automobile."*

**However, the Plan candidly acknowledges there is a significant shortfall in funds available to build and maintain the Vision:**

*"An estimated \$2.2 billion in revenue is anticipated to be available over the 25-year planning period. TRPA forecasts needed investments totaling nearly \$3.2 billion to implement the*



*plan's project list (Appendix B). With this funding shortfall, the Region cannot afford to build and maintain all the transportation infrastructure and services that it needs ..."* (page 96).

Respectfully, we must add that the project list in Appendix B is missing a number of key projects we believe are fundamental to achieving the stated Vision. We are also concerned that assumptions in the Revenue Narrative (Appendix C) are overly optimistic, particularly with regard to the availability of federal funding.

**That being said, the key point is that the Plan acknowledges that the Plan and Vision are unfunded by an estimated \$1 billion.** We believe this is a conservative estimate.

### **Can We Afford to Wait 25 Years?**

The Plan states, "There is broad consensus that to meet the growing travel demand the Tahoe Region needs a transportation system transformation." We wholeheartedly agree. However, given the constraints on the "reasonably foreseeable forecast of future revenues:" (page 95) a number of vital projects are scheduled well into the future. Frankly, in our view, some key projects are scheduled too far into the future.

Some examples:

• **TTD Maintenance & Administration Facility**                      **2035 (TTD)**

The TTD's current fleet storage and maintenance facility is "third world." It is wholly inadequate to support the proposed increase in South Shore-based transit services identified in the Plan: "*By 2025, strengthening the existing transportation system to ensure foundational transit services and trails infrastructure are in place for all travelers in Tahoe ...*"

There can be no strengthening to ensure foundational transit services based on the South Shore are **in place** without a new TTD maintenance facility as soon as possible. There is a critical need for larger maintenance bays, safety and security improvements, proper facilities for employees, and storage for a larger fleet of transit vehicles.

• **Tahoe Valley Greenbelt**    **2035 (City of South Lake Tahoe)**





This project is a cornerstone of the City's adopted Tahoe Valley Area Plan (TVAP). It is envisioned to include pedestrian and bicycle improvements, SEZ and stormwater water quality improvements, and new recreation amenities. Why should we wait 15 years?

• **Pope Beach Bike Path** **2035 (US Forest Service)**

This project is described as a non-motorized path to beach amenities. The cost estimate is \$500,000, yet according to the RTP, is anticipated for construction 15 years from now.

• **Class 1 Bike Trail from City limits to Sawmill Road** **2045 (El Dorado County)**

The trail is to be along US Highway 50. This is a vital segment for expanding and connecting the South Shore's Class 1 trail network. Why must we wait 25 years?

• **South Shore Greenway Shared Use Trail Planning and Future Phases (beyond phases 1b and 2)** **2045 (CA Tahoe Conservancy)**

This is planning for the segments that connect the Sierra Tract, Van Sickle Bi-State Park in the core of South Lake Tahoe. To be realized 25 years from now?

• **Trail and Intersection Improvements - City Recreation and Swim Center Renovation/Replacement Tahoe)** **2045 (City of South Lake)**

This project incorporates additional trail improvements as well as a 4th leg at the intersection of Tallac and US 50, an important safety upgrade. Why wait 25 years?

• **California Multi-Modal Signal Control Optimization** **2045 (Caltrans)**

The public has been clamoring for this type of project for many years. Clearly, it is an essential project for managing traffic flow and congestion. We are being asked to wait another 25 years?

These are just South Shore area examples. Based on our conversations with colleagues on the North Shore, we know they have similar concerns.



### **Transit Service Improvements/Expansion**

The phasing of transit service improvements and expansions is described in primarily general terms, e.g., Phase 2025, Phase 2035, and Phase 2045. The statement is made:

*"Transit services will be added incrementally over the next 25 years to provide 15-minute service between town centers and recreation destinations; 30- to 60-minute service between neighborhoods and town centers; and inter-regional service for commuters and visitors from neighboring regions."*

**Based on what we have heard, we believe the general public, the business community, many local elected officials, along with many Tahoe visitors want transit service improvements accelerated beyond the incremental improvements described in this Plan. For some the word "want" is more properly described as "demand."**

**Note:** A total of six projects listed in the Transit category are on the "Unconstrained List" meaning no funding has been identified to make them a reality. Interestingly, five of the six identify the "Private" sector as the potential source of money. There is no indication or where or how the private sector will fund these projects. There are more unfunded transit projects on the project list than in any other category.

**And yet, transit is repeatedly touted as a cornerstone of the RTP. In published statements describing the RTP, there are TRPA quotes that underscore the importance of transit:**

*"The plan focuses on transit, trails and technology to relieve traffic congestion, better manage parking, and reduce local greenhouse gas emissions to meet or exceed the targets of California and Nevada. "*

*"The plan calls for expanded transit services and a robust network of trails, sidewalks, and bike lanes. TRPA believes every Tahoe resident should have safe, reliable, and convenient ways to get around without having to drive."*



There is no mention in these quotes that the plan is underfunded and that without additional funding sources, the RTP update, as described, will not be fully realized.

### **Understanding Travel Behavior Patterns** (Chapter 3, The Plan)

In recognizing Lake Tahoe's transportation system must serve everyone, the draft RTP identifies and builds strategies around three travel groups:

- **Everyday Tahoe – Residential and Workforce Travel**
- **Discover Tahoe - Recreation Travel**
- **Visit Tahoe - Regional Entry and Exit Travel**

**Note:** The percentages attributed to user types on page 36 appear inconsistent with other population and visitation pattern data we have seen.

In our view, these groupings obscure the level of day use, defined as the number of visitors driving in and out of the Tahoe region on a daily basis. Currently, day use data appears blended between Visit Tahoe and Discover Tahoe. Typically, day users contribute little if anything to the Tahoe economy or transportation solutions, yet are responsible for significant transportation and environmental impacts.

**We encourage the final RTP to quantify the current and projected level of day use impacting the Tahoe Region and to support opportunities for day-use visitors to pay their share for the essential transportation solutions necessary to meet the mandates of the Compact and goals of the Regional Transportation Plan.**

### **Technology** (pages 63-66)

Yes, "Transportation technologies are rapidly advancing ..." Yes, Policy 6.4 to make the "dig once" the basin-wide standard, requiring public and private roadway projects to accommodate the installation of conduit to support community needs (e.g.: broadband fiber optics) is important.



**The question is: Are we doing enough as a region to convince broadband private service providers that the Tahoe Region is a market ripe for their infrastructure and service investments? The RTP should do a better job of helping to make this case.**

**The RTP should adequately address the technology infrastructure required to support a regional traffic operations center** (ITS, fiber, cellular and radio infrastructure). We believe a regional traffic operations center is essential as a management tool to reduce congestion, ensure the coordination and dissemination of information about transit services and other non-auto mobility modes of travel. The operations center would also be critical in providing public information in event of the need for guidance and directions for roadway-based evacuations.

#### **Funding the Plan** (pages 95-100)

The draft RTP clearly acknowledges the shortfall in funding necessary to fully implement the plan. **TRPA's estimate of the shortfall is \$1 billion.**

Text on page 99 (Unfunded Parts of the Vision) states:

- By 2025, \$97 million is needed, \$3 million for active transportation projects and \$94 million in deferred operations and maintenance.
- By 2035, \$240 million is needed to address shortfalls of \$22 million for transit and \$218 million for deferred operations and maintenance.
- By 2045, \$674 million is needed, \$9 million for technology improvements, \$266 for deferred operations and maintenance, and \$399 million for transit.

The draft RTP also acknowledges "*Resort destinations like Lake Tahoe, which see high visitation and seasonal travel demand, require funding sources for transportation services that reach beyond the basic needs of residents and nearby commuters.*" (page 95)

#### **One Tahoe Initiative**

Text on page 95 states, "*The Bi-State Consultation on Transportation, TRPA, and its regional partners have agreed to collaborate to identify dedicated regional revenue sources to fill the*



*funding gap. The TTD is advancing regional revenue through the One Tahoe Initiative, which will require bi-state legislative changes. That work has been integrated into the Bi-State funding discussion."*

**To be credible, it is our view that the new RTP must include a work plan that moves the Bi-State Consultation, TRPA, and "its regional partners" to consensus on an approach to "regional revenue" within one year or less.**

### **The One Tahoe Executive Summary**

**"Lack of funding keeps the community's transportation vision from becoming reality."**

(This is an excerpt from the One Tahoe Executive Summary)

"Although the solutions to Tahoe's transportation problems have been known for decades, progress towards implementing the planning transportation system has been slow because the existing transportation funding sources have never provided enough money to make the community's vision a reality. After several revenue studies, two attempts were made in the 1980s to gain public approval for a sales tax dedicated to transportation. Under the (TTD) legislative authority in-place at that time, two-thirds of the voters in each of the portions of the five counties having transportation facilities in the Basin were required for approval. This proved to be an insurmountable bar and both attempts failed."

"Tahoe visitation and traffic have continued to increase and create ever worsening conditions and negative impacts on the 'Tahoe Experience.' In 2018, the TTD engaged Morse Associates Consulting, LLC to examine the transportation funding shortfall and make recommendations regarding the most appropriate revenue mechanisms for addressing the Basin's ongoing shortfall in transportation funding. This initiative has been tagged as the "One Tahoe Transportation funding initiative." The major items of work in the ONE TAHOE process were:

- Review and refine the magnitude of the transportation funding shortfall.
- Conduct a robust communication process with the public, stakeholders, public agencies, and



elected decision-makers on the funding shortfall and solicit ideas on funding mechanisms to address it.

- Develop a screening process and evaluation criteria for assessing proposed funding mechanisms.
- Identify next steps for pursuing the proposed mechanisms.”

**Fundamental to the next steps is the Regional Revenue Work Plan we referenced above. We respectfully suggest this work plan be developed and be included in the RTP as an Appendix. Without this roadmap forward and timely commitment to secure regional revenue, in our view, the 2045 Linking Tahoe Regional Transportation Plan lacks adequate credibility.**

#### **Additional RTP and Regional Revenue Synergy**

Currently, TRPA is working with a Transportation Technical Advisory Committee (TTAC) to update its Vehicle Miles Traveled (VMT) Threshold. We understand the purpose of this work is to transition the Agency’s VMT threshold from one “rooted in concerns about nitrogen loading to the Lake, to one designed to promote mobility, reduce dependence on the private automobile, and support the attainment of the GHG reductions goals of California and Nevada.” (Excerpt from TRPA staff memorandum to members of the TTAC dated September 25, 2020).

We know TRPA has traditionally applied mitigation fees on new development and redevelopment projects. We understand the Agency intends to continue this practice with the new fee structure developed for the updated VMT Threshold. However, we believe broad agreement on a regional revenue source will not only accelerate implementation of the comprehensive RTP, including the full range of transit services identified in the Plan, but also, by virtue of doing so, significantly accelerate the region’s ability to reduce VMT and support the attainment of the GHG reduction goals of California and Nevada. Simply assessing VMT fees on the limited amount of new development and redevelopment projects will not achieve what full RTP implementation will achieve. And Tahoe can’t wait for 2045 to do so.



Thank you for the opportunity to submit these comments on the **draft 2045 Linking Tahoe Regional Transportation Plan**. We sincerely hope to see our input reflected in the final version of the Plan.

Let's ensure this RTP update is the one that finally moves us forward in a meaningful way toward not just vision, but implementation and the achievement of our environmental and economic goals.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Bob Anderson", is positioned above a light blue horizontal line.

Bob Anderson  
Chair, Board of Directors

A handwritten signature in black ink, appearing to read "Steve Teshara", is positioned above a light blue horizontal line.

Steve Teshara  
Chief Executive Officer

## Michelle Glickert

---

**From:** Kelly Beede <KBeede@townoftruckee.com>  
**Sent:** Friday, October 23, 2020 3:51 PM  
**To:** Michelle Glickert; Kira Smith  
**Cc:** Becky Bucar  
**Subject:** Truckee Comments-TRPA RTP  
**Attachments:** Town of Truckee Comments on TRPA RTP.pdf

Hi Michelle and Kira,

We appreciate you meeting with us today to discuss our comments on the September 2020 Draft TRPA RTP. Attached is the Town of Truckee's comments on the plan. Below are a few additional comments.

- Page 64 mentions that TART has purchased EV/ZE vehicles and are in the process of creating mobility hubs around the region. Truckee TART has not purchased electric vehicles and the Town is not in the process of creating mobility hubs at this time. It's my understanding (based on a recent conversation with Jaime Wright) that Placer TART has not purchased EV/ZE vehicles.
- Page 74 mentions that freight is moved by the Burlington Northern Santa Fe Railway. I'm not sure if this should state Union Pacific Railroad as they are the owners of the rail line through Truckee.
- Page 189 states that the Town of Truckee funds TART services on the North Shore, which is not correct. The Town funds Regional TART operated by Placer County for the portion of service that operates within Truckee.
- The report makes general statements about improvements TART will make and about TART ridership, demographics, etc., but does not differentiate between Placer TART and Truckee TART; operated by two different entities in two different counties. Page 171 also mentions TART on several line items without stating whether it's Placer TART or Truckee TART. To be clear in the document, it would be helpful to distinguish between Truckee TART and Placer TART

Here's the link to the Truckee Transit Center Relocation Feasibility Study project website where you can download the study document and attachments from the front page. <https://www.truckeetransitcenter.com/>

Again, we appreciate the opportunity to participate in the development of this important regional planning document.

Have a great weekend!



*Kelly Beede*

Administrative Analyst II

Transit | Special Events

Town of Truckee

desk: 530.582.2489

cell: 530.214.7044

Town Council

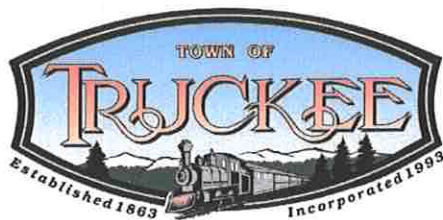
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Andy Morris, Town Attorney

Randall Billingsley, Acting Chief of Police

Kim Szczurek, Administrative Services Director

Judy Price, Communications Director/Town Clerk

Daniel Wilkins, Public Works Director/Town Engineer

Denyelle Nishimori, Community Development Director

October 22, 2020

Ms. Michelle Glickert  
Principal Transportation Planner  
Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, NV 89449

Re: Draft TRPA RTP Comments

Dear Michelle:

The Town of Truckee appreciates the opportunity to review the *September 2020 Draft Tahoe Regional Planning Agency Regional Transportation Plan*. Based on our review, below are the Town's comments.

- Throughout the document, park-and-ride and intercept lots are discussed. For Truckee specifically, the Plan identifies park-and-ride lots on State Routes 89 and 267 within Truckee. The Town is not interested in large areas of land being consumed by surface parking, especially if the sole purpose is to mitigate traffic congestion within the Tahoe Basin. Structured parking that has multiple uses may be more realistic from a land compatibility standpoint. The Town respectfully requests that this be reflected in the TRPA RTP document.
- The Plan makes the following statements related to potential expansion of State Routes 89 and 267:
  - Enhance transit operations on SR 89 and SR 267 corridors by providing a transit-only lane and/or high occupancy vehicle (HOV) lane.
  - Support implementation of adaptive corridor management, including a transit priority lane within the Resort Triangle between Truckee and the North Shore in Placer County, California on State Routes 267 and 89.
  - By 2035, SR-89 and SR-267 on the North Shore will have modified lane configurations that allow for bus only lanes during peak congestion periods to improve transit reliability and boost its competitiveness with the personal automobile.
  - By 2035, Placer County, California will implement transit signal prioritization at intersections along State routes 89 and 267 in the Resort Triangle to provide better travel options during congested travel times and the Nevada Department of Transportation will invest in AV and vehicle to everything communication infrastructure along its state routes in the Region.

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AGENDA ITEM NO. VII.B & IX.A

The Town of Truckee General Plan Circulation Element includes the following policies related to roadway widening beyond two lanes:

- Policy 6.4: Maintain Highway 267 between Interstate 80 and the Brockway Road/Soaring Way intersection at two lanes.
- Policy 6.5: Maintain roadways in Truckee at a maximum of two travel lanes. Exceptions to this policy include Interstate 80, Highway 89 South, Highway 267 from Truckee Airport Road/Shaffer Mill Road to Brockway Road/Soaring Way, and Coldstream Road.
- Policy 9.3: Oppose any development in the Planning Area that would necessitate widening of Highway 267 north of Brockway Road to four lanes.

The Town respectfully requests that this policy information be included in the TRPA RTP document.

As a key regional stakeholder, the Town of Truckee appreciates the opportunity to participate in the development of this important regional planning document. As the TRPA moves forward with developing projects outlined in the RTP, communication and collaboration with the Town is essential to the success of projects that impact the Truckee community.

Should you have any questions or need clarification of Town comments outlined in this letter, please contact Kelly Beede ([kbeede@townoftruckee.com](mailto:kbeede@townoftruckee.com); 530-582-2489).

Sincerely,



Daniel P. Wilkins  
Acting Town Manager

## **Kira Smith**

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**From:** doug welch <dw7230q@sbcglobal.net>  
**Sent:** Friday, October 23, 2020 4:03 PM  
**To:** Rebecca Cremeen  
**Subject:** 2020 Draft RTP

Rebecca,

My wife and I understand that the 2020 draft RTP proposes an elimination of the existing Vehicle Miles Traveled standard which will then permit a significant increase in the number of vehicles miles traveled in the basin. With no attempt to cap the numbers of visitor vehicles to the basin there will be permitted an accompanying significant increase in the number of vehicle miles traveled in the basin. This new standard would then be used for studies and analyses of future traffic with no thought of reducing the number of vehicles or the total number of vehicle miles traveled in the basin. If there is no cap on the total number of vehicles in the basin there is no cap on the number of total miles traveled in the basin. Even a brief visit to the Emerald Bay area in the summer will demonstrate the need for vehicle reduction not a significant increase of vehicles. In other words under the 2020 draft the total number of miles traveled will continue to increase as the number of vehicles increases even if each vehicle drives fewer miles.

We believe that the basin should be studied with regard to a limit of the total number of miles that the basin can accommodate. Once the basin's total capacity is understood then the study can reflect that fact and plan for ways to address those limits in a sensible manner. Instead the proposal disregards the capability of the basin and sets in motion unlimited growth and traffic that will threaten the public health and safety. For example it is well understood that an emergency evacuation of the basin would be difficult at best under present conditions but a significant increase in traffic would greatly complicate matters such that a fire could take the lives of many of the very persons you should be attempting to protect. We urge you to consult a well respected traffic expert to determine whether this proposed modification will cause an increase in traffic and whether it will cause an emergency evacuation to become more difficult and threaten the lives of those in the basin. The proposed draft also fails to take into account the impact of peak traffic periods at which times H89 is in gridlock under present conditions.

Other impacts to the Tahoe region include environmental degradation including air and water quality as required by the California Environmental Quality Act. What is TRPA doing to address additional impact of visitors to the basin, such as day visitors? Has TRPA just thrown in the towel and decided there is no point in trying to control visitor traffic in the basin and allow unlimited traffic?

We urge a reconsideration and rejection of the 2020 draft proposal.

Doug and Valerie Welch  
Meeks Bay, California

## Kira Smith

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**From:** Mimi Morris <mimimorris1217@gmail.com>  
**Sent:** Friday, October 23, 2020 6:17 PM  
**To:** Rebecca Cremeen  
**Subject:** Change to VMT standard

To the TRPA—

We are very concerned with TRPA's proposal to eliminate the existing VMT standard, which places a total cap on VMT in the basin, and replace it with a different standard that is based on the VMT driven per person (“per capita”). If this change is approved, VMT could continue to increase in the basin as the number of vehicles in the basin increases, even if each person drives less such that the per capita standard is met. Not only does increased VMT mean more uncontrolled traffic and additional environmental impacts, but it also further threatens public health and safety.

- The proposed replacement of the existing capacity-based VMT standard with only a GHG-based VMT standard would allow traffic in the Basin to increase *without any capacity limits*.

\* Uncapped VMT growth would result in negative impacts to other thresholds, including water quality.

\*Uncapped VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation).

\* The RTP does not adequately address traffic associated with visitors, especially day-only visitors.

\* The RTP fails to identify adequate funding and continues to place the heaviest burden on residents despite the greatest impacts coming from visitors.

\* The environmental checklist fails to incorporate the most recent information about environmental, economic, and public health and safety conditions, as required by California law (CEQA).

\* The proposal to rely on “Annual Average” VMT rather than a maximum daily VMT fails to account for significant impacts of traffic during peak periods, resulting in potentially fatal consequences associated with emergency evacuation and access.

\* The RTP and its relationship to the existing TRPA VMT standard is confusing and it is unclear how the Initial Study is judging the significance of the VMT impacts.

\*The RTP policies and TRPA statements indicate that TRPA is “giving up” on controlling visitor traffic in the region, but isn’t that what a regional planning agency is supposed to do?

Mimi and Mike Morris

## Kira Smith

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**From:** Ron Grassi <ronsallygrassi@mac.com>  
**Sent:** Saturday, October 24, 2020 7:22 AM  
**To:** Rebecca Cremeen  
**Subject:** TRPA's proposed change of VMT Threshold

Dear Ms. Cremeen: I wanted to voice my objection and concern with TRPA's proposed change of how we should measure VMT in the Basin. I have recently reviewed the letter from the California Attorney General's office and I agree with them and their concerns. I want to especially draw your attention to this portion of their letter:

"I. The RTP/SCS does not meet or achieve TRPA's existing environmental threshold for VMT.

The Regional Plan establishes a VMT threshold of 10 percent below 1981 levels. (TRPA Threshold Standards, p. 10; see also TRPA Resolution 82-11, p. B-10). TRPA presently estimates the numeric value of that limit to be 1,298,987 daily VMT. (IS/IEC, p. 200).<sup>4</sup> The RTPS/SCS and the IS/IEC confirm that the basin is currently in exceedance of the threshold limit with daily VMT of 1,393,994 in 2018. (Ibid.).<sup>5</sup> The RTP/SCS will not reduce existing basinwide VMT to below the threshold. Rather, with implementation of the RTP, basinwide daily VMT is forecasted to increase by 1.2% by 2045 and to exceed the threshold standard. (IS/IEC, p. 200). Importantly, VMT is forecasted to have a much greater increase absent the reductions that have been modeled using the Trip Reduction Impact Analysis ("TRIA") tool. Without these reductions, daily basinwide VMT would increase 8% above existing levels and 15% above the threshold—to 1,505,533 daily basinwide VMT—in 2045. (IS/IEC, p. 200). As discussed in detail below, the TRIA reductions are unsubstantiated and likely over-stated.

A summary of the relevant VMT values as reported in the IS/IEC is as follows:

VMT Threshold: 1,298,987

Existing VMT: 1,393,994

VMT forecast for 2035 with RTP: 1,388,320

VMT forecast for 2045 with RTP and TRIA: 1,410,202

VMT forecast for 2045 with RTP without TRIA: 1,505,533

Acknowledging that the RTP/SCS will not achieve and maintain the existing VMT threshold and therefore cannot be approved by TRPA because TRPA would not be able to make the required findings, the IS/IEC explains that TRPA intends to amend the existing threshold at the same meeting where it considers approving the RTP/SCS. (IS/IEC, p. 197).<sup>6</sup> In other words,

<sup>4</sup> The Executive Summary of the RTP/SCS sets forth a different threshold value, (RTP/SCS, p. ES-19 [stating the threshold is 1,303,301]), but later uses a figure consistent with the IS/IEC. (RTP/SCS, p. 109 [stating the threshold is 1,298,987]).

<sup>5</sup> The RTP/SCS again sets forth different values for existing VMT in 2018. (RTP/SCS, p. ES-19 and 109 [stating existing (2018) VMT is 1,398,994]).

<sup>6</sup> As the IS/MND explains, "TRPA is developing a metric promoting VMT reductions per capita to meet the GHG objectives of both California and Nevada." (IS/IEC, p. 197). While we appreciate the ongoing effort to update the threshold and support utilization of a VMT per capita standard for GHG purposes, in line with what has been implemented in California, we remain hopeful that TRPA will retain an absolute basinwide VMT limit to address the broader range of  
October 23, 2020

Page 4

the IS/IEC assumes that TRPA will move the goalposts: the RTP/SCS at present does not meet the requirements for VMT in the region, so TRPA plans to weaken those requirements so that the Plan can be approved. While a threshold amendment may be forthcoming,<sup>7</sup> the proposed RTP/SCS does not meet the environmental objectives for the basin as they exist today. This is particularly concerning given the important nexus between VMT and other environmental impacts (e.g., noise,

dust, pedestrian safety, etc.). It is even more concerning, given the reliance on the TRIA reductions, which are unsubstantiated and rely on unfunded projects, for which there is no guarantee of, or requirement for, implementation.

II. The IS/IEC's VMT impact analysis is flawed.

A. The IS/IEC erroneously concludes that the RTP does not have a significant VMT impact.

The IS/IEC appears to analyze the VMT impact of the RTP/SCS pursuant to a net zero VMT standard. The IS/IEC states that it "analyzes any VMT related impacts as set forth in TRPA's 2019 Interim Guidance for assessing the impact of development projects and plans," and that, "[u]nder the Interim Guidance, a project or plan would not cause a significant impact if the action does not produce any unmitigated VMT." (IS/IEC, p. 197). The document appears to use this standard to evaluate the RTP/SCS's VMT impact for purposes of environmental review under both CEQA and the Compact.

Applying this standard, the IS/IEC mistakenly concludes that the RTP/SCS results in a net reduction in VMT and thus has a less than significant impact. It claims that "strategies included in the 2020 RTP/SCS result in a net reduction in VMT by approximately six percent." (IS/IEC, p. 200). This claim is inconsistent with the data presented in the IS/IEC. According to the IS/IEC, existing VMT in the basin is 1,393,994. The IS/IEC forecasts that VMT in the basin will increase to 1,410,202 by 2045 with the implementation of the RTP (after TRIA reductions).<sup>8</sup> This change constitutes a 1.2 percent increase in VMT from existing levels. This increase in VMT is not mitigated. Given this net increase in VMT, it is plainly false to conclude, as the IS/IEC does, that environmental impacts associated with VMT. Indeed, the Regional Plan Implementation Committee's (RPIC) direction in March, 2020, directed staff to update the threshold so as to define "the level of regional VMT and VMT reductions that TRPA is then committed to managing and planning for at both the regional and project level." (RPIC, VMT Threshold Update Staff Report (March 18, 2020), p. 1 [motion]). A VMT per capita standard alone, particularly if only applied prospectively, would not meet this defined objective.

<sup>7</sup> We note that TRPA has convened a group of stakeholders, the Technical Transportation Advisory Committee (TTAC), to develop recommendations for an amended threshold. The work of the TTAC is not yet complete—there is another TTAC meeting planned for November—so the outcome of that process is not yet known, nor has the Governing Board considered or approved an amended threshold.

<sup>8</sup> As

I believe their analysis with which TRPA does not disagree is to the effect that the Basin is already not meeting the VMT threshold. And that your new measure will not assist TRPA in meeting the current threshold.

So what's going on here? It appears that TRPA is, as the Attorney General's office states, moving the goal post. You can move the goal post only if you're able to prove flaws in the existing VMT measure (which you've been using for years) and that your new proposed threshold will clearly, not speculatively, improve projects and the environmental health in the Basin. So let me ask you: can you provide the numbers on say the Squaw Valley project using both the current VMT numbers (both by TRPA and the plaintiffs in the present litigation) and the numbers that would apply if your change were approved.

I think there are dozens of examples at the appellate level, both Federal and State, demonstrating that the Courts look dimly on environmental government agencies that seek to lower the bar to allow them to continue over-building an area.

Finally, I suggest TRPA consider a different approach: Use and exceed the current VMT standard AND at the same time meet a new and more global standard: **Carrying Capacity**: Will the proposed project exceed the overall carrying capacity

of the area in question. And then spend some time defining that carrying capacity threshold. So for example if the subject area is already over-run with traffic jams even without an emergency evacuation occurring, then stop worsening the problem by routinely allowing the project to go forward.

Sincerely, Ron Grassi  
Tahoe City





# LAKE TAHOE BICYCLE COALITION

PO Box 1147 | Zephyr Cove, NV 89448 | tahoebike.org

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*Attorney at Law*

Nick Speal  
*Software Engineer*

October 25, 2020

Tahoe Regional Planning Agency  
Rebecca Cremeen, Acting Senior Planner  
Michelle Glickert, Senior Transportation Planner  
Via email

Re: 2020 Regional Transportation Plan Comments

Dear Ms. Cremeen and Ms. Glickert,

We are writing to support the adoption of the Draft 2020 Linking Tahoe: Regional Transportation Plan (RTP) and provide a few suggestions. We appreciate the opportunity to comment on this important plan.

The Lake Tahoe Bicycle Coalition (Bicycle Coalition) is a member-supported, all-volunteer nonprofit organization with a mission to help Tahoe become more bicycle friendly. We promote opportunities for more people to ride bikes in Tahoe, including providing free valet parking for bicycles at community events, co-hosting the annual Lake Tahoe Bicycle Challenge, and producing the Lake Tahoe Bikeways Map.

We worked closely with the Tahoe Regional Planning Agency (TRPA) to develop and adopt the 2017 RTP and we are more than encouraged by the successful implementation of the active transportation projects proposed in that plan. Almost all the projects under the Trails category on the constrained list have been completed or are in progress.

We applaud Ms. Glickert, Ms. Smith, and the staff at TRPA for the development of the 2020 RTP, in particular for their thoughtful and forward-thinking approach to making it safer and easier for people riding bicycles in Tahoe. We are happy to see progress and the new, more focused priorities in each RTP update.

The Bicycle Coalition strongly supports the following aspects of the 2020 RTP and we believe they are necessary to achieve use and safety goals:

- Better connections to neighborhoods, including completing the south shore Greenway and regional Tahoe Trail.
- The focus on equity through Priority Communities consisting of the elderly, individuals with a disability, and those without access to a car.
- Maintaining building infrastructure for year-round use.
- Employing education, outreach, and wayfinding tools.

The Bicycle Coalition will continue to collaborate with TRPA to help advertise winter trail plowing, implement the annual Bike Challenge, provide the free regional Tahoe Bikeways Map, promote safety, and support in-class education.

The RTP would not be as visionary and achievable as it is without the extensive opportunities for input that TRPA has provided to the Bicycle Coalition and to the public in general. We commend TRPA on the interactive map which has provided an easy, coherent way to share feedback.

We feel that our feedback has been heard and incorporated, but we want to take this opportunity to suggest some additions and changes:

- The Bicycle Coalition continually advocates for safety improvements to the 5-lane highways that generally serve as main streets in our communities around the Lake. Progress has finally been made on the south shore as Caltrans programmed SHOPP funds for collision reduction. The project (CTIPS ID 220-0000-0156, EIP project: <https://www.laketahoeinfo.org/Project/Detail/4210>) is described “In South Lake Tahoe, on US50 from Route 89 to Park Avenue. Install lighting, pedestrian signals at mid-block crossings, signs, and green bike lane treatment to improve safety for pedestrian and bicyclists.” This project is a key priority for us and is kicking off in November 2020. It is in the TMPO’s FTIP, but we do not see it mentioned in the RTP and we want to make sure it is a priority.
- We supported the development and adoption of the Safe Routes to School (SRTS) Plan on the south shore which was incorporated into the 2017 RTP. The 2020 RTP shows that “Everyday Tahoe” travelers account for 51% of trips which suggests that school-related trips must drive a lot of the trips. This provides opportunities to promote alternatives to cars for families and we would like to see more of a focus on prioritizing SRTS planning and implementation on a regional scale, beyond the south shore.
- TRPA’s monitoring project has provided much needed data for our region. We have seen a 15% increase in trail use between 2018 and 2019 which demonstrates how important infrastructure is and makes our region and individual communities more competitive for many funding sources. We would like to recommend the addition of more bicycle and pedestrian counters, especially temporary ones that can be used for 2-3 years for pre- and post-project monitoring.

Improving Tahoe’s network of bike routes and trails contributes to our status as a world class tourism destination for outdoor activities. This boosts our economy, while making life more safe and convenient for residents wishing to ride bicycles to work, to school, or for fun. More people riding bikes can also mean fewer people driving cars, which helps with Tahoe’s peak traffic congestion. By emphasizing

improvements for bicycle infrastructure through the RTP, the plan lays the groundwork for many projects that will greatly benefit all of us. The Bicycle Coalition is excited to keep working with TRPA and its implementing partners to get the Trails projects in the 2020 RTP funded and built.

Thank you for the opportunity to provide these comments.

Sincerely,  
Lake Tahoe Bicycle Coalition Board of Directors

October 25, 2020

Rebecca Cremeen, Acting Senior Planner  
Michelle Glickert, Senior Transportation Planner  
Tahoe Regional Planning Agency  
Stateline, NV 89449  
*Submitted via email*

**Re: 2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy: Plan and Initial Study – Mitigated Negative Declaration/ Initial Environmental Checklist – Mitigated Finding of No Significant Effect**

Dear Ms. Cremeen, Ms. Glickert, TRPA staff and Governing Board –

**Introduction**

The League to Save Lake Tahoe (League) appreciates the opportunity to provide input on the draft 2020 Linking Tahoe: Regional Transportation Plan (RTP or Plan) prepared by the Tahoe Regional Planning Agency (TRPA). We support and recognize the RTP as an essential step in implementing sustainable, long-term transportation solutions in the Lake Tahoe Basin. The Plan demonstrates TRPA's commitment to adopting forward-thinking policies, endorsing critical transit improvements, and collaborating with local jurisdictions and stakeholders. This is reflected in the approach to further implement the goals and policies laid out in the 2017 RTP by focusing on four critical areas (trails, transit, technology, and communities) with a more realistic funding plan. The constrained projects accurately reflect the needs and shortfalls of Tahoe's current transportation climate and anticipated future demand. The League appreciates the flexibility built into the plan which may allow for accelerated implementation of some priority projects, at least as pilots or proof-of-concept.

The League agrees that it will take a combination of public and private players, and changes to how Tahoe approaches both existing and future development, to implement the ambitious and achievable 2020 RTP. As the Plan states (page 115), "Addressing demand for travel begins at the project level with private development helping to improve mobility in Tahoe, reduce regional VMT to attain and maintain TRPA's VMT threshold, reduce mobile source GHG emissions, and reduce roadway congestion. TRPA and its many partners will further reduce demand on Tahoe's roadways by creating travel options that are more attractive than the personal automobile." If carried out successfully, this 2020 Plan will represent real, tangible progress for the entire Tahoe region. We support the general concepts presented in the RTP but suggest bolstering certain policies and including additional solutions to further strengthen the Plan and ensure its successful implementation. While we support the RTP and understand that the VMT threshold update is a separate process, they are inextricably linked and we need to be comfortable with the VMT update before we can support adopting the RTP.

### **Performance Measures and Adaptive Management**

The League was involved with the development of the 2017 RTP and we would like to see an analysis or summary of how we performed as a region in terms of implementation. We are envisioning a high-level summary that is not the performance measures required by the State and Federal governments, but one that identifies the number or percentage of projects completed in each category and progress toward plan goals. Beyond the absolute number or percentage, metrics like transit ridership, miles of trails built and roads rehabilitated, amount of money actually raised for each category, etc. can be used by partners and decision makers to help identify where we thrived and where we struggled as a region. It would be ideal to have this the year before each RTP update, or along with TRPA's threshold update schedule, and used as a basis for an ongoing performance evaluation that is part of adaptive management, allowing us to achieve even more success with the 2020 RTP and future updates.

### **Overview**

We have three high-level concerns with the RTP and corresponding environmental documents.

- **Plan alignment.** TRPA relies on local governments and agencies to implement the RTP, with the Tahoe Transportation District (TTD) and Tahoe Truckee Area Regional Transit (TART) responsible for transit. TRPA staff did a great job working with transit implementers to create the constrained project list and funding plan. In order to align goals, policies, projects, and timelines, the transit providers will need to update their respective plans – Transit Master Plan (TMP), Short Range Transit Plan (SRTP), and Corridor Connection Plan. The League would like to see a schedule for transit providers to bring their plans into alignment included in the final adopted RTP.
- **Revenue projections and project prioritization.** While we believe that the 2020 RTP is a reasonably fundable plan, this year's pandemic and associated challenges are a reminder that even well-laid plans can be derailed. We also understand that project prioritization is not always explicit in an RTP. In line with a theme of the 2020 RTP, we would like to see options and flexibility in funding. This could be a subjective discussion of a worst-case scenario such as no additional local funding becoming available.

The League would also like the Plan to prioritize within the unconstrained project list. For example, it is concerning that the cross-lake ferry and intercept lots appear to be considered at the same level of importance or necessity, as we believe that intercept lots achieve more RTP goals than ferries. The prioritization could start with the tradeoffs between vehicle miles traveled (VMT) reduction and non-auto mode increase based on cost effectiveness.

Finally, we recommend more consistency in language around transit project prioritization. The Plan can be more consistent by describing a flexible approach to reflect the statement on page 43 that "The plan and its phases are built to flex and adapt, such as for the accelerated implementation envisioned in the Bi-State Consultation or to accommodate pilot projects that advance the plan to its goals" instead of the more prescriptive language on page 45 calling for local and community routes and then recreation and seasonal services.

- Levels of significance, thresholds, and mitigation measures in the Initial Study – Mitigated Negative Declaration/ Initial Environmental Checklist – Mitigated Finding of No Significant Effect (IS/IEC). The League is very concerned about the use of the currently-under-development VMT threshold update, project-level guidance, and air quality mitigation fee (VMT Workplan) as mitigation for the RTP. The League continues to support intelligent, collaborative transportation planning within the Lake Tahoe Basin, and it is certainly not our intention to take any action which might interfere with federal funding. However, the RTP policy and implementation relies on other documents that have yet to be released even though they are repeatedly referenced throughout the RTP. Specifically, the RTP is contingent upon the completion of the VMT Workplan which still has some contentious issues to address – the removal of the “absolute” regional VMT threshold and replacement with an “efficiency” standard for the Basin in particular. It is also unclear how the Transportation Technical Advisory Committee’s (TTAC) work and RTP are connected. It is safe to assume that with the exact same December 2020 RTP and VMT Workplan package approval date, there is no opportunity to incorporate the TTAC’s important efforts to evaluate VMT and other metrics for traffic impacts into the RTP.

We provide detailed comments in the Environmental Analysis section of this letter, but the timing of the release of the RTP in relation to other referenced documents, as well as the metric review processes mentioned above, has made it difficult for the League to adequately review and comment on the RTP as it stands today. We don’t want to change the threshold to *adopt* the RTP, we need to change it to *implement* the RTP. The League needs to be comfortable that the VMT threshold update fulfills that intent before we can support the RTP.

We also have issues with the analysis around water quality and population and housing impacts. The League must hold its full support of the RTP until consideration of the below recommendations.

### **Plan Details**

Our comments provide additional detail on the big picture issues raised above, request additional information, and provide more detailed recommendations in the following areas:

1. Overarching Comments on Projects
2. Transit Projects
3. Trails Projects
4. Technology Projects
5. Community Projects
6. Funding the Plan
7. Measuring and Managing for Success
8. Moving Forward/Implementation
9. Comments on Appendices
10. Environmental Analysis
11. Conclusion

## **1. Overarching Comments on Projects**

### *Constrained Versus Unconstrained Projects*

The narrative and the project list in Appendix B are difficult to track in some cases. We recommend improving consistency by creating separate lists for constrained and unconstrained projects. For example, some projects are listed as both constrained and unconstrained (e.g. Appendix B “Regional Bicycle and Pedestrian Improvements from the Active Transportation Plan 2026-2035” is both constrained and unconstrained for 2035). This is further confused by the “Summary of all Projects by Strategy” table in Appendix B which indicates that there are not any unconstrained active transportation projects projected for 2035 or beyond. League staff also noted some inconsistencies in the narrative sections regarding unconstrained projects and between the narrative and the project lists. The Plan states that additional unconstrained project funding will result in mobility hubs and transit centers coupled with park and ride and intercept lots, and a cross lake passenger ferry. The mobility hubs and cross-lake ferry are on the project list but the intercept lots are not on the list, even though intercept lots are planned for implementation in 2045 on page 49. We believe intercept lots are an integral piece of the RTP and encourage TRPA to include them on the project list – either constrained (potentially by replacing some Operations & Maintenance funding) or unconstrained.

### *Employer-Based Trip Reduction Program*

On page 41, the Plan asserts that the Commute Tahoe employee trip reduction program “will be widely launched throughout the Region in 2021 and monitored annually by TRPA.” This was identified as an implementation measure for the 1992 RTP, is codified in TRPA’s ordinances, and it has never been enforced. The League sits on the Board of the South Shore Transportation Management Association (SS/TMA) and we are excited to help bring awareness to and provide resources for this program. Education and outreach only go so far - does this mean that TRPA will begin enforcing its Code of Ordinances Section 65.5? We would like to see a schedule and workplan for that enforcement and look forward to annual status reports on progress including Level 2 employers’ designated Employee Transportation Coordinator and Employer Transportation Plan.

### *Parking Management*

As with our comments on the 2017 RTP, we would like to see more of a focus on regional parking management. As a region, we need to get ahead of potential opposition to the change and explain to the public what it is and why it is good for Tahoe. The 2020 RTP could help start this paradigm shift. There are no parking management projects or programs specified in the RTP beyond the existing SR 28 pilot program and already-planned efforts in Tahoe City-Resort Triangle and potentially Meeks Bay. Local jurisdictions and specific projects are already beginning to implement parking management but a regional approach is needed, as recommended in ICF’s 2019 report “Exploring Emerging and Innovative Transportation Solutions for Tahoe” (White Paper) and TDM workshop (Appendix D) and by the Bi-State Consultation (page ES-4). Additionally, as per our 2017 RTP comments, TRPA can implement parking management strategies such as replacing parking minimums with parking maximums and creating regional consistency through minor changes to its Code of Ordinances (Section 34.2).

## **2. Transit Projects**

Reiterating our overarching comments on revenue projections and project prioritization, we would like to see more general language throughout the Plan that explains how flexible timing and phasing can be used to achieve performance measures through an adaptive management approach to decide which projects to pursue over the 25 year planning horizon. We are especially fond of the Bi-state Consultation’s goal for transit enhancements “to double transit ridership in town centers and at popular recreation areas” (page ES-4) and would like that to be one of the specific goals of the 2020 RTP, using adaptive management and project prioritization to achieve it. This is a realistic priority focus. We also expect that this performance measure and approach will be reflected in partner agencies’ updated TMPs and SRTPs. This performance measure- based adaptive management structure can be implemented by TRPA for transit with their authority under TDA Public Utilities Code (PUC) Section 99244.

Based on initial successes and lessons learned from microtransit in Tahoe, the League would like a stronger emphasis on early implementation of microtransit and private service providers in line with the Bi-state Consultation’s priorities. We were encouraged to see some indication of early microtransit implementation on page 51 – “Private transit operators will provide service every 20-30 minutes along the SR-89 recreation corridor between Pope Beach and Emerald Bay for South Shore Riders” by 2025. The League is very supportive of this aspect of the SR 89 Corridor Plan and this RTP, but we were disheartened to see the Emerald Bay pilot project from the 2017 RTP not implemented and not carried forward to the 2020 RTP. To help accelerate implementation of transit service between Camp Richardson and Emerald Bay, it would be helpful if this were a standalone project or separate sub-project of SR 89 Corridor Plan implementation in the RTP.

Finally, we have one very specific recommendation that we hope is in the purview of the RTP. We would like the bus stop on eastbound Lake Tahoe Boulevard between Julie Lane and Tata Lane in South Lake Tahoe moved. With the completion of a “complete streets” project for this section of Lake Tahoe Blvd. in 2021 – which will reduce the vehicle lanes to one in each direction – and the anticipated construction of the 240-unit Sugar Pine Village, this bus stop will see more use and will create more user conflicts. We recommend moving the bus stop from the soon to be busy and narrow road to Julie Ln or Tata Ln, where the bus route circles the block anyway.

## **3. Trails Projects**

Creation and rehabilitation of trails has been a great success in Tahoe over recent years and we are encouraged that the trend will continue with 2020 RTP implementation. The League supports the focus on completing the South Shore Greenway and the Tahoe Trail around the Lake - especially the bike path connections along the North Shore. We encourage TRPA to play a regional role in outreach and education to help local implementers build their trail projects. TRPA’s leadership and resources can help proactively address issues like visitor management (e.g. trash and graffiti, enforcement) and public misconceptions (e.g. effects of bike paths on residential neighborhoods).



#### **4. Technology Projects**

The League strongly supports “Making Travel Options More Attractive with Technology” and encourages TRPA to provide more discussion and improvement recommendations. As with regional leadership and support for trails projects, TRPA can support and provide resources and collaboration to accelerate technology improvements which improve our regional transportation system - such as coordinating message feedback signs. TRPA can also provide resources for, and/or require as a condition of funding to transit providers, automatic rider counting and stop number boarding, which the League believes is one of the most important and incomplete datasets. Technology is one area where TRPA does not have to rely on implementing partners. TRPA can directly implement technology improvements like a regional trip planning tool and regional parking management. Even though this is a new RTP focus for 2020, the League encourages TRPA to accelerate the technology goals and actions as possible, and queue the rest of them up to be a priority in the next RTP update. For the 2020 RTP, the League’s priorities for accelerated projects are a regional trip planning tool in place by 2025 and other “technology for the user” improvements as near-term priorities.

#### **5. Community Projects**

This is another new focus area for the 2020 RTP that the League strongly supports, especially the mobility hubs, Community Priority Zones, and detailed Corridor Plan discussions.

##### *Mobility Hubs*

The League sees mobility hubs as a necessary piece of the transportation system and is concerned that the high price tag will be a barrier to implementation. As noted above, we are also unsure if the mobility hubs are constrained or unconstrained. Regardless, there is an opportunity to make progress by building on the existing transit centers and TTD’s recent purchase of a potential site in Incline Village. Mobility hubs do not require a large footprint or a lot of amenities to integrate multimodal services and make journeys across several modes convenient. Smaller mobility hubs may be placed behind commercial areas or integrated into mixed-use development in Town Centers. These mini mobility hubs can still include amenities such as a bike share, e-charging, PMD, TNCs, microtransit, real-time transportation info, and more - with room for full size transit as that service expands. Any number of these amenities can also be added to enhance existing transit centers. This approach could be especially effective and lower cost if large mobility hubs are on the unconstrained list.

##### *Community Priority Zones*

This was a fantastic idea to include in the 2020 RTP. Based on the narrative and data, the areas identified seem to include our most dense populations of the elderly, individuals with a disability, and those without access to a car. To ensure they are comprehensive and align with Regional plan goals, the League would like to see how the annual Unmet Transit Needs meeting results are reflected and how much overlap there is with Town Centers. We would also like to see more closely zoomed in maps of each Community Priority Zone. It is difficult to tell, for example, how much of the Rocky Point neighborhood is included, or the exact extent of the Kings Beach Priority Zone.

## **6. Funding the Plan**

Reiterating our overarching comments, the League would like the Plan to 1) at least roughly identify which funding sources go to which projects, programs and plans (i.e. what gets cut if the local share or regional revenue source projections are not realized?); 2) prioritize the unconstrained projects based on cost-effectiveness for reaching VMT and mode share goals; and 3) make the language around timing/phasing more consistent and include flexibility based on performance measures and adaptive management.

Identifying reasonably foreseeable funding and reconciling that number with the nearly endless list of potential transportation projects is one of the most difficult, and most important, pieces of the RTP. The League commends TRPA staff for performing an incredible balancing act resulting in what we believe is a more realistically fundable RTP than the 2017 RTP. After a detailed review, League staff provides the following recommendations for your consideration, and some questions we would like answered.

- The table at the beginning of Appendix B projects a revenue shortfall of \$97 million by 2025 – \$3 million for active transportation projects and \$94 million for deferred operations and maintenance. We recommend focusing on raising the \$3 million for specifically identified active transportation projects which are historically easier to fund in Tahoe and would eliminate the entire active transportation deficit, ensuring full build out of the Trails focus area.
- Free-to-the-user transit is a transformative change that has been a long time coming in Tahoe. We would like to see it highlighted as a success to continue and build upon. It would be helpful if the Plan clarified that the farebox revenue in the projections are from the ferries and regional transit, not from in-Basin transit.
- How much revenue does the rental car mitigation fee provide annually, when was the last time it was updated, and is there an opportunity there? What about fees on TNCs like Uber and Lyft to offset their well-documented congestion increasing effects?
- What is the Transportation Improvement Program (TIP) update schedule? Can it be used to incorporate Bi-state Consultation or other priorities based on performance measures and adaptive management?

## **7. Measuring and Managing for Success**

Performance tracking and monitoring is of course integral to successful plan implementation. TRPA has made great advancements over the last four years with additional bike and pedestrian counters, better tracking of transit ridership, and accessing “big data” sources. The League commends TRPA staff on this and encourages the agency to require and/or provide affordable methods of before-and-after trip and mode share tracking for all significant projects. We also provide a few specific suggestions here to enhance the monitoring protocols.

- Break out e-scooters and other private transportation providers. This would help better estimate the effects on VMT, GHG, and mode share if private providers do not become as prevalent as planned or if existing providers, such as Lime, were to leave the Tahoe market.
- We greatly support verifying non-auto mode share through real-time data and enhanced travel surveys due to its status as a primary Bi-State Compact (Compact) goal and one

of the only two overall performance measures for the RTP, the other being a threshold which rises to a similar level of importance as Compact goals.

- It is well known that accidents involving bikes and pedestrians are underreported, nationally and in Tahoe.<sup>1</sup> The League encourages TRPA staff to work with local law enforcement agencies to better track incidents, not just accidents. One method that the advocacy community made some initial progress toward is creating or activating specific incident and accident codes for bike, pedestrian, and car crashes (bike-car, bike-pedestrian, pedestrian-car, etc.). This would help better track the performance measures, prioritize or create projects and programs in response, and apply for funding to implement the RTP.
- As part of this Plan, pavement condition should be tracked to correlate with the water quality threshold impacts from Plan implementation. This could also help ensure implementation with water quality and stormwater funding sources.
- The League encourages TRPA to use their authority under TDA Public Utilities Code (PUC) Section 99244 to “annually identify, analyze, and recommend potential productivity improvements, which could lower the operating costs of those operators who operate at least 50 percent of their vehicle service miles, as defined by subdivision (i) of PUC Section 99247, within the area under its jurisdiction.” Based on this annual assessment and resulting recommendations, TRPA should use its authority to allocate funding based on the operator implementing recommended improvements and meeting established performance measure targets. The performance measures should be those in the Plan (with the addition of the Bi-State Consultation goal to double transit ridership) and the recommendations should be part of the adaptive management approach to implementing projects.

## **8. Moving Forward/Implementation**

The 2025, 2035, and 2045 visions are thoughtful and inspiring, but we continue to ask that some flexibility be incorporated. The League is encouraged to see that “TRPA will establish methods for understanding and reporting on Everyday, Discover, and Visit Tahoe travelers to better understand each user, their travel needs, and how much VMT each produces.” When TRPA establishes this schedule, we would like it to be integrated with the performance measure based adaptive management implementation structure which we are recommending.

## **9. Comments on Appendices**

### *Appendix D: Innovation in Transportation*

The League was excited to see the 2019 White Paper and take part in the TDM workshop that same year. We support all of the recommendations summarized for each section in Appendix D. We would like to see more of these recommendations reflected in the Plan, especially microtransit, micro mobility, seasonal shuttles, and incentives and marketing (which is notably absent, especially with the TMAs recently increasing their capacities and TTD getting \$250,000

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<sup>1</sup> Lake Tahoe Region Safety Strategy (2019): <http://www.trpa.org/wp-content/uploads/Tahoe-Safety-Plan-Final-02-20-2019-reduced-size.pdf>

for two years of marketing). The recommendations and this new information, for example, could be put under TDM – “marketing and information” – on page 40.

#### *Appendix F: Environmental Justice*

The League appreciates this addition to the 2020 RTP and would like to see it emphasized more in the Plan narrative, including a section in the Executive Summary.

We are very supportive of the recommendation at the end of this appendix for TRPA, acting as the MPO, to adopt a new definition for disadvantaged communities (DAC) that is specific to Tahoe. This could make Tahoe more competitive, or even just eligible to apply, for many California funding sources. One recommendation is to base the DAC definition on the environmental justice demographic analysis used to define priority communities in this appendix. The League has additional ideas for criteria, and we would be excited to work with TRPA on this action.

League staff noted that the Stateline Community Priority Zone seems to be missing from Table 23: Priority Communities Transportation Access.

#### *Appendix G: Data and Forecasting*

The League appreciates TRPA’s time to update the TRIA tool, making it more realistic than the past TRIA runs associated with the 2017 RTP and some specific projects. The description of TRIA 2.0 asserts that the update was based on current conditions in the Tahoe Basin, or existing trip reduction estimates developed locally. This appendix also mentions that Placer County updated its vehicle trip generation (VTG) rates. We would like to know how the trip rates built into TRIA 2.0 compare to trip rates developed by Placer County and the trip rates in TRPA’s latest interim project-level guidance.

Because TRIA will be used throughout the Basin for all land use projects, it must be as accurate as possible. We have two specific questions and a request that will help build our confidence in this tool:

- How are intercept lots included when they are not on the constrained project list? Same question for parking management.
- How are GHG benefits from PMDs established? The League has received feedback that is critical of the GHG reductions claimed by Lime.
- We would like TRPA to conduct a sensitivity analysis to see how projects analyzed using TRIA 1.0 in the past compare to a TRIA 2.0 analysis (the Highway 50 Revitalization Project is a good candidate).

### **10. Environmental Analysis**

The Initial Study – Mitigated Negative Declaration/ Initial Environmental Checklist – Mitigated Finding of No Significant Effect (IS/IEC) is very detailed and thorough. The League is providing specific concerns about the water quality, population and housing, and VMT metrics, assumptions, and findings.

### *Water Quality*

In the TRPA checklist section 14.e “Maintenance of public facilities, including roads” (page 184), it is stated that “ Because projects included in the 2020 RTP/SCS would be similar in nature, scale, and location as under the 2012 RTP/SCS, and would incorporate site specific design and mitigation, no new significant impacts or substantially more severe impacts would occur beyond those previously analyzed in the 2012 RTP/SCS EIR/EIS and 2017 RTP/SCS IS/IEC.” The difference between 2020 and the past two RTPs is that deferred maintenance appears to be on the constrained project list in 2012 and 2017 but largely unconstrained in 2020. The League agrees with this change because we think it will help accelerate funding for implementing projects with more VMT reduction and mode share diversification benefits. The unintended consequence of this change is that there may be fewer water quality benefits than assumed in 2012 and 2017 as road maintenance reduces sediment delivery to the Lake. The link between pavement condition and water quality is expressed in System Preservation Goal 6.2: “Maintain and preserve pavement condition to a level that supports the safety of the traveling public and protects water quality.” The League would like to know if the 2020 RTP’s effects on water quality are substantially different than those based on the 2012 and 2017 assumptions. If there are more negative water quality impacts, we would be happy to discuss potential additional mitigation measures such as funding deferred maintenance projects through EIP plus other funding sources that are not traditionally transportation-focused.

### *Population and Housing*

In the CEQA Environmental Checklist section b. “Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?” (page 176), it is stated that “Similar to the 2017 RTP/SCS, new and modified transportation and land use projects included in the 2020 RTP/SCS are not anticipated to cause the displacement of existing housing or people...”. Between 2017 and now, the Highway 50 Revitalization Project (Loop Road) has progressed to the point of having a preferred alignment. That preferred alignment would temporarily and permanently displace residents and businesses. The alignment would also affect TRPA checklist sections 11.b and 12 regarding temporary housing and changes in affordable housing. It is possible that the environmental review for the Loop Road covers this issue. Nonetheless, the issue should be directly addressed, especially considering a much smaller project is specifically addressed in the 2020 RTP IEC/IS (Caltrans Tahoe City Maintenance Station).

### *Vehicle Miles Traveled*

The League has four main areas of concern related to vehicle miles traveled: 1) the absolute increase in VMT is not necessary or acceptable, 2) the outcomes of the in-progress VMT Workplan seem pre-determined and RTP adoption is based on those outcomes, 3) RTP adoption must be based on the current thresholds, and 4) it is unclear if the current mitigation measures will continue even though more are needed.

The IEC/IS finds (page 200) that “Notwithstanding the beneficial impact of implementing the 2020 RTP/SCS, the Plan Area in the 2045 condition would exceed the VMT threshold value (as the region does today) by an additional 1.2 percent even though the RTP strategies are VMT reducing strategies...Thus, while implementation of the 2020 RTP/SCS would be beneficial

regarding VMT (and therefore not cause an adverse impact under CEQA), it would not be beneficial enough to reduce VMT by an additional 8 percent (or 111,215 vehicle miles) to meet the current VMT threshold.” On the next page, this is qualified with the statement that “In order to adopt the 2045 RTP/SCS, TRPA’s Compact and Code require the Governing Board to find that the entire Regional Plan (including the RTP), will eventually achieve and maintain the VMT threshold. TRPA, however, has limited levers to control the exogenous VMT generation that primarily drives the nonattainment status of the threshold.” The League does not believe that all feasible mitigation measures have been considered and takes issue with the assertion that TRPA cannot control “exogenous VMT generation”. If a project (or plan in this case) results in an increase in VMT, it must look to mitigate those impacts. The only mitigation measure offered beyond the project aspects themselves is the current phased release of allocations, which we will discuss more below. While TRPA may not be able to control mega-region population growth and increased interest in outdoor recreation, it absolutely can – and is charged by the Compact to – influence how people get around after they arrive. The external or “Visit Tahoe” trips that are allegedly out of TRPA’s control only constitute 11% of the regional VMT. TRPA can and must find incentives and regulatory tools to reduce VMT from trips within the Basin, which are absolutely in TRPA’s control. Identifying these tools and how to incorporate them into the RTP and TRPA Code of Ordinances should be the focus between now and December. The League is more than willing to be a partner in that effort.

The League, TRPA and many partners have invested considerable time into the VMT Workplan through the TTAC and Governing Board meetings over the last few months. After reviewing the RTP and IEC/IS, we are disappointed in how pre-determined the results of the VMT Workplan seem to be. As discussed above, in order to adopt the RTP, the TRPA Governing Board must find that it will not cause a threshold to be out of attainment. TRPA is clearly assuming the RTP will be adopted in December which means the existing VMT threshold will have to change to allow adoption. This assumption is clear on page 202: “As discussed above, TRPA commenced a process to update the VMT threshold to reflect concerns more directly measured by VMT, including GHG reduction, increased mobility, and reduced reliance on the automobile. Under direction of the Regional Plan Implementation Committee, TRPA is developing a metric promoting VMT reduction per capita to meet the GHG objectives of both California and Nevada that will also drive increases in mobility and decrease reliance on autos. Because the 2020 RTP/SCS limits VMT growth to nominal levels that exceed state standards, TRPA will likely be able to make the necessary findings to adopt the 2020 RTP/SCS.” The League interprets this to mean that TRPA plans to change the VMT threshold to be in attainment so the Plan can be adopted.

The League feels it is premature to assume what the new standard will be, and we also have a “process issue”. The TTAC has not reached consensus on the type of threshold (i.e. absolute or efficiency), let alone what the threshold standard will be. The Plan and IEC/IS repeatedly refer to a per capita VMT as a performance measure and an outcome of the results chain, insinuating that a per capita threshold will be adopted in order to adopt the Plan. Even without TTAC input, TRPA should not assume that a per capita VMT threshold is appropriate to measure transportation impacts in Tahoe. TRPA started analyzing per capita VMT in 2012 as a requirement of SB 375’s GHG requirements. In both the EIS/EIR for the 2012 RTP and the

IEC/IS for the 2017 RTP, TRPA clearly states that “VMT per capita is a valid metric for helping to address greenhouse gas analysis, but it is not a transportation standard under TRPA regulations or CEQA requirements, and is not a strong measure of transportation impacts because overall traffic could still increase under this measure. The 2012 RTP/SCS EIR/EIS referenced the appropriate standard of significance for transportation impacts, which was the VMT Threshold Standard, as analyzed in the 2012 Regional Plan Update EIS (RPU EIS), which was in process at the same time as the 2012 RTP/SCS EIR/EIS, and recently reported on in the 2015 Threshold Evaluation Report.”<sup>2</sup> The 2017 RTP was adopted based on the projection that the Basin would be in attainment of the absolute VMT standard in 2020. This is not the case with the 2020 RTP. We are currently out of attainment and need to be comfortable with a replacement. We are open to the idea of an efficiency standard but it will need to have triggers and response mechanisms to make sure we do not have uncontrolled VMT growth.

Beyond the projects in the Plan, the only mitigation measure for VMT is the same mitigation measure that the 2012 RPU, 2012 and 2017 RTPs, and projects included in those plans rely on: Mitigation Measure 3.3-3 from the 2012 RPU EIS which addresses impacts to the Vehicle Miles Traveled Threshold Standard. The mitigation required to maintain VMT threshold attainment is “the phased release of land use allocations followed by monitoring and forecasting of actual roadway traffic counts and VMT. New CFA, TAUs, and residential allocations will be authorized for release by the TRPA Governing Board every four years, beginning with the approval of the Regional Plan.” On page 201 the IEC/IS explains that “TRPA Code Section 50.4.3 requires TRPA to stop issuing residential allocations if the agency cannot conclude the VMT threshold will be maintained over the next four years. As the current VMT threshold is presently out of attainment and is not anticipated to come back into attainment by 2045, no residential allocations will be distributed.” Consistent with our VMT comments, the League is concerned that TRPA will change the VMT threshold at the same meeting that the RTP is up for adoption which would allow the release of residential allocations, which would not be allowed with the current threshold. The phased release of residential allocations is an example of the type of mitigation that may be required to compel TRPA and implementing partners to prioritize investment in transportation. While the phased release of the small number of remaining residential allocations will itself not have a huge impact on regional VMT, the intent is that the loss of allocations will motivate implementation agencies to prioritize RTP projects in their jurisdiction. To our knowledge, TRPA has never actually withheld allocations even when the code required that action. Due to this history, we have reservations that TRPA will implement or enforce responses to threshold exceedances. This is why we regularly propose early triggers and gradual responses so a drastic and unpopular response is not needed. The League would like to work with TRPA to identify feasible mitigation measures in addition to the phased release of allocation that motivate RTP implementation.

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<sup>2</sup> 2017 RTP IEC/IS, Page 3-53. <http://www.trpa.org/wp-content/uploads/2017-RTP-SCS-IS-IEC-All-Attachments.pdf>

## **11. Conclusion**

The League is generally supportive of the Plan itself, with the specific recommendations contained in this letter. Big picture, we would like to see better alignment with implementers' plans, a discussion of a "worst case scenario" for funding projections, prioritization of unconstrained projects, and a performance measure-based adaptive management implementation structure which we are recommending TRPA clearly articulate and commit to in the Plan.

The League's main concern with the IEC/IS is that it is inappropriately reliant on a yet-to-be-determined VMT threshold update and it cannot be adopted without a fundamentally "lower" VMT threshold because we are not in attainment of the current threshold. It is not appropriate to change the threshold in order to achieve attainment and adopt the RTP. We need to take this opportunity to figure out ways to compel partners around the Basin to help implement the RTP. This means that the threshold needs to have triggers and responses that TRPA will enforce.

Tahoe needs to aim for higher standards than either Nevada or California. The burden of making up for the environmental impacts of past development should not fall solely on new development, which requires TRPA to find ways to use its resources and authority to also reduce the impact of existing development. The League would like to work with TRPA staff and the TTAC to identify additional feasible mitigation measures that will encourage and accelerate RTP implementation.

Thank you for considering and incorporating our comments and suggestions. Please do not hesitate to reach out to me directly with any questions.

Sincerely,



Gavin Feiger  
Senior Policy Analyst





## Tahoe Area Group

October 25, 2020

Rebecca Cremeen  
Tahoe Regional Planning Agency  
Regional Plan Implementation Committee  
(Via email to [rcremeen@trpa.org](mailto:rcremeen@trpa.org))

Dear Ms. Cremeen:

The Tahoe Area Group objects to the 2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy (RTP) and its plan to eliminate the current Vehicle Miles Travelled (VMT) standards. We also object to the conclusions drawn in the corresponding Initial Study/Mitigated Negative Declaration and Initial Environmental Checklist/Mitigated Finding of No Significant Effect (IS/MND) that the RTP would have less than significant impact on VMT and does not require mitigation. This conclusion is not supported by the data.

The RTP does not achieve TRPA's existing environmental threshold for VMT and the IS/MND does not appropriately analyze the RTP's VMT impacts or substantiate compliance with California's required Greenhouse Gas (GHG) reductions. The VMT standard is not being met, but to simply remove the standard and replace it with a GHG-based per-capita standard that would allow traffic in the Basin to increase without any capacity limits is contrary to the TRPA compact and to the purpose of the RTP. This would be inappropriate and will lead to increased VMT in the Basin. We support the addition of a GHG standard provided that it does not lead to increased uncapped VMT growth, which is what the proposed RTP would do.

The proposed abolishment of the VMT standard is unacceptable. Elimination of the VMT standard in the Basin paves the way for major changes to the health and safety of the environment and the residents. The TRPA compact requires that environmental carrying capacity of the basin is not exceeded. It must live up to that commitment. Using "annual averages" does not take into account the high season periods that puts emergency response at risk and gridlocks our roads.

For the TRPA to change the environmental standards it has in place to push through the RTP plan without adequate environmental protections is disingenuous and contrary to its mission. We recommend against adoption of the currently proposed RTP. Furthermore, we incorporate by reference into this comment letter the comments provided by Friends of the West Shore and California's Attorney General Office (see attached).

Carolyn Willette  
Chair of the Tahoe Area Group of the Sierra Club



October 25, 2020

Mr. Nick Haven, Long Range Planning and Transportation Division Manager  
Ms. Michelle Glickert, Principal Transportation Planner, TRPA  
Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, NV 89449

RE: TNT-TMA Comments on Draft Regional Transportation Plan

Dear Nick and Michelle:

Thank you for providing the Truckee-North Tahoe Transportation Management Association (TNT-TMA) the opportunity to provide comments on the draft Regional Transportation Plan 2045.

On behalf of the TNT-TMA Board of Directors, and recognizing that this is a 25-year transportation plan for the Lake Tahoe region, we are providing general, overall comments.

Understanding that there is more than a \$1 billion funding shortfall in order to complete the transportation projects included in the plan, the TNT-TMA supports the concept of One Tahoe as an additional funding source for transportation projects. As there are many details that need to be worked out (such as specific rates, the gateway locations, etc.) the TNT-TMA supports ongoing coordination in the short-term to capitalize on the momentum to provide this additional funding source for the long-term.

As the TNT-TMA represents both Truckee and North Lake Tahoe (including ski resorts such as Squaw Valley and Northstar), we also recommend including the entire Lake Tahoe region in this discussion of a One Tahoe funding source. The entire area then can benefit from the funding source over the next 25-years to complete critical transportation projects. This approach recognizes the vision of the RTP 2045 as a "transportation system that is interconnected, inter-regional, and sustainable, connecting people and places in ways that reduce reliance on the private automobile".

Other overall comments relate to the characteristics of the different types of travelers to the Lake Tahoe region and we appreciate your indicating this in the plan to distinguish these travelers (residents, commuters and visitors). All of these travelers have different travel behavior and as such need to be

addressed in ways to maximize the number of people who will switch modes from driving, when possible, to other commute alternatives.

In order to achieve commute mode shift from driving, we recommend that there should be more emphasis on intercity transit improvements, with the understanding that one of the key factors driving the auto dominance of our resort area (compared with other mountain resorts) is that it is difficult to get here without a car from other areas of California.

In addition, one of the commute alternatives, bicycling, can be an excellent alternative to driving for not only visitors but also for residents. The RTP 2045 includes completion of the Tahoe Trail by 2045. One shorter-term priority that the TNT-TMA encourages the TRPA to support, for example, is a multi-purpose bicycle path between Kings Beach and Incline Village. During high seasons, in particular, this area has high traffic congestion. Providing residents as well as visitors with a bicycle path not only promotes an alternative to driving but also provides an enjoyable, healthy alternative for the user and for the environment.

For all travelers, there should also be recognition in the RTP 2045 that many visitors now coming to the Lake Tahoe region from other areas are utilizing technology (mostly app-based) to make their transportation choices. The TNT-TMA encourages a one-stop, region-wide communications tool to provide traveler information. This only encourages more mode shift from driving to other alternatives.

Finally, the TNT-TMA encourages the importance of coordinating with Placer County, the Town of Truckee, Placer County Transportation Planning Agency and the Nevada County Transportation Commission when pursuing funding and implementation of projects that benefit not only the TRPA boundary but the entire Lake Tahoe region. As we are all aware, both commuters and visitors are traveling to Lake Tahoe to work and recreate throughout the entire Lake Tahoe region.

Thank you for the opportunity to provide comments. Please contact the TNT-TMA if you have any questions. On behalf of the TNT-TMA, we look forward to engaging with the Lake Tahoe region stakeholders to implement transportation solutions for residents, commuters and visitors alike, and strongly encourage an additional funding source, such as the One Tahoe concept, to fulfill the vision of the Regional Transportation Plan 2045.

Sincerely,



Christine Maley-Grubl, CAE  
Executive Director

cc: TNT-TMA Board of Directors

October 25, 2020

Julie Hutchinson  
P.O. Box 223  
Tahoma, CA 96142

Tahoe Regional Planning Agency  
P.O. Box 5310  
Stateline, Nevada 8944.

***Sent via Email to: rcremeen@trpa.org***

Re: Public Comment  
Draft 2020 Regional Transportation Plan  
Vehicle Miles Travelled Threshold Standard.

Dear Ms. Cremeen,

I am very concerned with TRPA's proposal to eliminate the existing Vehicle Miles Travelled (VMT) standard, which places a total cap on VMT in the basin, and replace it with a different standard that is based on the VMT driven per person ("per capita"). If this change is approved, VMT could continue to increase in the basin as the number of vehicles in the basin increases, even if each person drives less such that the per capita standard is met. Not only does increased VMT mean more uncontrolled traffic and additional environmental impacts, but it also further threatens public health and safety. Have we learned nothing from the impacts of too many people and vehicles in the Tahoe basin this year due to the pandemic? Sustainability of the environment, the lake, and the communities should be the priority not increasing traffic and visitors.

The draft 2020 Regional Transportation Plan (RTP) relies on the elimination of the existing VMT standard and its replacement with the per capita standard which has yet to be fully explained and vetted appropriately. This is another example of TRPA fast-tracking multiple changes and projects without the public even having a full understanding of what is being proposed. The outreach being done for the draft RTP does not even emphasize the change in the VMT or what that means. How is possible to determine the VMT change and then at the same meeting consider the RTP? Is TRPA already sure the proposed VMT change will pass? What is the rush? Why is the VMT information and its impacts not being disclosed with the public and elected officials? These efforts by TRPA are disingenuous, purposely confusing and very concerning as to the motive.

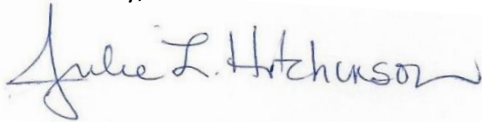
It is also important to make the following points which must be included in the record:

- The proposed replacement of the existing capacity-based VMT standard with only a GHG-based VMT standard would allow traffic in the Basin to increase without any capacity limits.
- Uncapped VMT growth would result in negative impacts to other thresholds, including water quality, sustainable recreation and forest health.
- Uncapped VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation).

- The RTP does not adequately address traffic associated with visitors, especially day-only visitors.
- The RTP fails to identify adequate funding and continues to place the heaviest burden on residents despite the greatest impacts coming from visitors.
- The environmental checklist fails to incorporate the most recent information about environmental, economic, and public health and safety conditions, as required by California law (CEQA).
- The proposal to rely on “Annual Average” VMT rather than a maximum daily VMT fails to account for significant impacts of traffic during peak periods, resulting in potentially fatal consequences associated with emergency evacuation and access.
- The RTP and its relationship to the existing TRPA VMT standard is confusing and it is unclear how the Initial Study is judging the significance of the VMT impacts.
- The RTP policies and TRPA statements indicate that TRPA is “giving up” on controlling visitor traffic in the region, but isn’t that what a regional planning agency is supposed to do?”

I am concerned with the TRPA’s continued focus on increasing visitors to the Tahoe area without consideration of residents, the environment, water quality, forest health, traffic, pollution, trash, and public safety. The fast-tracking of projects to rush them through leaves the public out of the process as too many things to take in at one time. The TRPA needs to reevaluate its purpose and charter and reconsider how it is doing business as the public has lost trust in this agency. Please provide more information on the proposed change in VMT and allow public to understand what is proposed and the true impacts. The Draft RTP should not even be considered until the VMT matter has been explained and vetted by the public. I will be reaching out to our state elected officials to discuss my concerns as it is clear that TRPA has its own agenda and it is not protecting the Tahoe Basin, but overcrowding it, over developing it, and creating an environmental and safety burden. We all will lose with that agenda.

Sincerely,

A handwritten signature in blue ink that reads "Julie L. Hutchinson". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Julie Hutchinson

**Tahoe Basin Fire Chiefs  
Lake Tahoe Regional Fire Chiefs Association**

October 25, 2020

Ms. Michelle Glickert, Principal Transportation Planner

Tahoe Regional Planning Agency

PO Box 5310

Stateline, NV 89449

cc: Mr. Nick Haven, Long Range Planning & Transportation Division Manager

Re: Comments on the 2045 Linking Tahoe Regional Transportation Plan  
Regarding Emergency Evacuation Planning for Emergency Response and Public  
Safety

Dear Ms. Glickert:

The Lake Tahoe Regional Fire Chiefs have reviewed the Draft Regional Transportation Plan prepared and published by the Tahoe Regional Planning Agency (TRPA).

It is our collective desire that evacuation planning that involves highways, transit, and other transportation network systems be incorporated into the plan. This would include emergencies related to wildfire, earthquakes, the release of hazardous materials, avalanches, and other natural or human-caused incidents and disasters.

We recognize that our comments are being submitted near the close of the 30-day comment period, but we nonetheless urge your consideration of our professional perspectives. This being the case, we respectfully urge your Agency to take the following two actions:


- Add language in the Final Plan recognizing the importance of emergency evacuation planning that involves Tahoe's highway and transportation network as a matter of public safety.
- Organize and work with a multi-jurisdictional group of emergency evacuation planners and first responders to assist TRPA with the development of language and provisions for

emergency evacuation planning that can be incorporated into the Agency's Regional Transportation Plan at a future date.

We firmly believe that a regional approach to evacuation planning and traffic management is essential to support effective emergency response as we work to protect and ensure public safety during any major emergency incident or natural disaster. It is not a question of if but rather when such an emergency occurs.

Thank you for your consideration and actions as requested.

Respectfully,

A handwritten signature in black ink, appearing to read "Scott Baker". The signature is fluid and cursive, with the first name "Scott" written in a larger, more prominent script than the last name "Baker".

Chief Scott Baker, Tahoe Douglas Fire Protection District  
*on behalf of the Tahoe Basin and Regional Fire Chiefs*



October 26, 2020

Mr. Nick Haven  
Tahoe Regional Planning Agency  
128 Market Street  
Stateline, NV 89410

**Re: Regional Transportation Plan (RTP)**

Dear Mr. Haven:

Thank you for the opportunity to review and comment on the Tahoe Basin Regional Transportation Plan. Placer County continues to be a committed regional partner for transportation improvements and reform in the region and supports the vision identified in the proposed update to the RTP.

We would like to provide the following constructive comments on the Draft RTP for your consideration. As always, we are open to additional dialogue that may be needed to address these comments.

General Comments:

- Update Figure viii, Figure ix, Figure x and Figure xi on pages ES-12, ES-13, ES-14 for change in mobility hubs from edits made to page ES-5.
- Add Regional Transit Service to maps along the I-80 corridor
- Modify Figure 39 to include Regional Transit Service along I-80 corridor. Also, mirror edits made for mobility hubs on page ES-5.
- Modify Figure 46 to include a "stub" for the Martis Valley trail connection in Placer County to the north.
- Modify Figures 51 and 57 to add Parking Management (P) to Town Center areas of Kings Beach and Tahoe City to the map
- On Page 64 of the draft plan it states that both TTD and TART have purchased electric buses. Placer County has not yet purchased electric buses for the TART operation as of October, 2020. To be certain there is no confusion, we confirmed with the Town of Truckee that they have not purchased electric buses either for their TART operation. That statement could be corrected by stating that Placer County has plans to deploy electric buses beginning in 2023.

The following comments are focused on the RTP project list, Appendix B:



- **Active Transportation**

- Class 1 Bike Trail along SR 28 – Preston Field to Northwood Blvd. should be identified for Incline Village not Placer County.
- The Lead Implementer for the Upper Truckee River Class 1 Trail widening and Class 1 Bike Trail – sunny side to Lower Sequoia should be identified as Placer County. The reality is that TCPUD may construct the trail widening but the for the RTP, this should simply identify Placer County.
- Should mobility improvements for sidewalks and Class II bike lanes be included? These are identified in the Tahoe Basin Area Plan for Kings Beach and Tahoe City.

- **Corridors**

- The current estimate for the Kings Beach Western Approach project is \$ 8,329,000. This amount is based on the numbers as required for the ATP grant application, so it differs slightly from earlier estimates. This breaks down as follows:
  - PA&ED and PS&E of \$1,279,000
  - R/W costs of \$1,260,000
  - construction phase cost of \$5,790,000
- The Tahoe City Complete Streets Highway Improvements are identified as "unfunded". However, this project is further identified in the 2025 constrained category. Please clarify.
- The SR 89/Fanny Bridge Project has a description of the RTP implementation. Please update the description.
- Should the Tahoe City Downtown Access Improvements be lumped in with the Tahoe City Complete Streets project above? Both recommendations came out of the TC Mobility Study.
- Does the link item cost for TDM Programs include funding for local jurisdiction coordinators (i.e. TMAs or DPW work tasks)? I believe there is potential for funding of a coordinator via TDA and/or CMAQ.

- **O&M**

- Please modify the Lead Implementor for the Bike and Ped Facilities (06.01.03.0007) to be Placer County

- **Technology**

- Please update the description for the Adaptive Traffic Management on SR 89 and SR 267 project to remove the reference to Truckee and replace with Placer County/Caltrans/CHP. The \$10,000,000 identified was for the Bus on Shoulder strategy which has been replaced with a 3 lane, center running BUS only lane. The cost identified can stay as is but please identify unconstrained funding needed (TBD), total implementation funding.

- Include Parking Management for Tahoe City and Kings Beach as well as Recreational sites (consistent with RTPP recommendations). Preliminary costs are identified in the Final RTPP. The description for project 06.01.03.0036 should be modified to reflect RTPP not, Tahoe City Access improvements.
- Please update the description for the Intelligent Mobile Observation (Highway) project to remove the reference to Truckee and replace with Placer County/Caltrans/CHP
- **Transit**
  - We would suggest that the lead implementer for Supplemental Transit Services 2025, 2035, 2045 be identified as local agencies instead of PRIVATE. Local agencies would be the entity to apply for State/Federal funds, if available, not private operators.
  - We would suggest that the reference to "Truckee" for projects 03.01.02.0120 and .0123 be removed. Please add Kings Beach to the list. Also, should these two projects identify local agencies or "Various" instead of TRPA?

Sincerely,

A handwritten signature in black ink, appearing to read "Peter Kraatz".

Peter Kraatz, Assistant Director  
Department of Public Works

Cc:

Erin Casey, County Executive Office  
Crystal Jacobson, Community Development Resource Agency  
Michelle Glickert, TRPA  
Devin Middlebrook, TRPA

## Michelle Glickert

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**From:** Ann Nichols <preserve@ntpac.com>  
**Sent:** Saturday, October 24, 2020 3:43 PM  
**To:** Michelle Glickert; John Marshall  
**Cc:** ann@annnichols.com  
**Subject:** Comments 2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

Dear Ms. Glickert:

The North Tahoe Preservation Alliance appreciates this opportunity to provide comments for the record on the draft **2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy** (RTP). The North Tahoe Preservation Alliance (NTPA) works toward the preserving the natural beauty and rural character of the North Shore of North Shore. For the last 13 years NTPA has been addressing the need for growth to be in sync with our infrastructure.

NTPA believes while the RTP contains projects and plans that may be beneficial to transportation at Lake Tahoe if actually completed and funded, we are extremely concerned with the actual basis of the report and its connection to other disturbing new funding proposals such as “One Tahoe” and the “2020 Prosperity Center Report”.

Our concerns include:

- The RTP with TRPA’s blessing and in advance of the actual RTP report changes the historical Vehicle Miles Traveled (VMT) standard. The RTP report would not meet the existing capacity-based TRPA standard for VMT, so TRPA’s solution is to CHANGE the VMT standard. Although environmental thresholds are the baseline standard which projects are compared to, changing environmental thresholds have become TRPA’s de facto solution to its inability to improve Lake Tahoe’s actual environment. Manipulating the numbers is not the solution.
- The new proposed GHG-based VMT standard would allow traffic in the Basin to increase without any capacity limits. Uncapped VMT growth would result in negative impacts to other thresholds, including water quality. We have begged TRPA for decades to determine a capacity that our existing infrastructure can handle. TRPA’s response has been “crickets”. TRPA refuses to provide a lake resident and visitor population capacity maximum citing VMT as a restricting determination. Now TRPA is changing VMT to fit their narrative.

The RTP fails to address the underlying problem at Lake Tahoe which is overdevelopment. Lake Tahoe is clearly at maximum capacity NOW in advance of the unbridled growth projected for the Reno area and surging population increase in the Tahoe basin since COVID. 2020 New Tahoe school student applications are unprecedented. We are over the capacity tipping point without the completion of TRPA promoted Community Enhancement Projects of Homewood, Boulder Bay, Ferrari Crown, and Kings Beach Projects. Don’t forget the Martis Valley West project and Nevada County’s promotion of crushing new Truckee development.

In the last 15 years none of TRPA’s development solutions to traffic problems have worked. To be realistic, even the East Shore Bike Trail didn’t get people out of their cars as much as create a new ATTRACTION drawing more visitors to Lake Tahoe.

The RTP ineffectively addresses issues associated with all Lake Tahoe visitors. The RTP does not adequately address traffic associated with visitors, especially day-only visitors. Lake Tahoe requires a limit on visitor capacity NOW. Residents are currently prisoners confined to their homes due to existing traffic with no respite during off season.

- Unrestricted VMT growth also poses threats to public health and safety (i.e. in the event of an emergency evacuation). Shelter in place is a sad and terrifying cop out.
- The RTP fails to identify adequate funding and continues to place the heaviest burden on residents despite the greatest impacts coming from visitors. "One Tahoe" is another attempt to change TRPA's bistate compact and is represented as the solution to the RTP's \$1.5b financial shortfall. One Tahoe wants to generate \$60m+ per year from visitors, residents and the Truckee area by charging tolls or creating a special use district. In addition, the 2020 Prosperity Center Report proposes increasing resident's property taxes. The proposed money grabs are unrelenting and there will never be enough money. It's the same old thinking, the same players and it has led to bigger problems.

The solution is to determine capacity and then shut down access to Tahoe visitors once the maximum has been reached; much as Yosemite does. Our local ski areas often shut down. This could be accomplished with a required visitor "Reservation America" type internet permitting in conjunction with Lake Tahoe entrance toll stations. Let's do the hard work and really fix the problem. We need a major adjustment in thinking about the problem...densifying development is not the solution.

Thank you,

Ann Nichols  
President



North Tahoe Preservation Alliance  
P.O. Box 4  
Crystal Bay, Nv. 89402  
775-831-0625  
[www.ntpac.com](http://www.ntpac.com)

"Helping preserve the natural beauty and rural character of North Lake Tahoe"

## Michelle Glickert

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**From:** McAvoy Layne <mcavoylayne@gmail.com>  
**Sent:** Sunday, October 25, 2020 9:31 AM  
**To:** Michelle Glickert  
**Subject:** This morning's news from the North Shore...  
**Attachments:** My Huckleberry Friend.WMA

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

Dear Ms. Glickert,  
Thanks for all you do for...  
"The Fairest Picture the Whole Earth Affords and The Air That Angels Breathe."  
I'll attach this morning's news from the North Shore...  
Your friend in Tahoe history where facts are not essential,  
McAvoy 😊  
PS: We could make better plans for the old elementary school  
than a bus hub, it would seem to me...

--

McAvoy Layne  
<http://www.ghostoftwain.com>  
Email: [McAvoyLayne@gmail.com](mailto:McAvoyLayne@gmail.com)



"Always do right, this will gratify some  
and astonish the rest." -Mark Twain



## MEMORANDUM

**Date:** October 28, 2020  
**To:** Nick Haven, Michelle Glickert, Tahoe Metropolitan Planning Organization  
**From:** Carl Hasty, District Manager  
**Subject:** TTD Comments Regarding Draft 2020 Regional Transportation Plan

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Nick and Michelle, here are our comments for the draft 2020 RTP. As you will see, we have chosen to focus on the appendices to organize and focus our thoughts and understanding. These perceptions and comments are intended to be constructive, with an eye to the future as we continue to work together on achieving big things in transportation.

### **Appendix A. Transit Goals and Policies**

Six goals and sixty-nine policies are briefly described. The goal headings make sense, yet the goals themselves are general with no identifiable objectives defining the path to success or outcomes to be achieved with the plan. Sixty-nine policies are large in number and are also generalized. Unlike the time and focus that has been given to prioritizing projects, it does not appear that any has been given to prioritizing policy achievements. And unlike projects and services, no party has been identified as lead for policy achievement nor has there been identified measurable results for policy achievement over the life of the RTP. While goals create a vision with a wide range, objectives focus on the individual, achievable outcomes. Without this type of prioritization and objective exercise, it makes it difficult to understand the relevance of the policy to implementation and operation of the regional transportation system. An added benefit to a prioritization and measurable goal exercise would be refinement of the policies themselves, that would better support implementation of the transportation system improvements.

**Recommendation:** For the goals, TTD would like to see objectives that are the concrete deliverables that make the goals come to life. Progress towards them helps measure advancement to reaching the larger end goals over the life of the plan. For the policies, TTD would like to see prioritization for the policies focusing on a scheme that addresses the building block approach needed to have a fully functioning regional multi-modal system in place by 2045. Within the policy priorities, TTD would like to see identified lead and support organizations, as well as measurable results to be targeted for achievement. This work and inclusion in the RTP would help implementers justify revenue needs for new capital and operations to achieve the goals, as well as assist in educating the public on needs and their value. Please also tie transit goals, policies, and projects to the respective planning document for reference.

## Appendix B. Project List

TTD is concerned that several projects submitted by TTD staff for the RTP have not been included. For example, under the heading of technology, most of what TTD submitted related to a number of systemic needs to operate proposed transportation solutions is absent. Basic to any technology use is the need for a robust broadband and wireless system that has the reach and capacity to be used when and where it is needed most, i.e. when visitation is heavy and at recreation destination areas and urban centers. That foundational infrastructure is woefully inadequate at Tahoe. The possible closest related policy in the RTP is about the dig once policy. While that policy will help within the Basin, it does not address getting broadband to the Basin. There is no technology policy identified relevant to emergency management, evacuation, or public safety. The only description focused on safety in the document is on page 10 which speaks to road, trail, and transit safety. *Policy 3.4: Support emergency preparedness and response planning, including the development of regional evacuation plans (page 73)* provides a generalized statement, yet projects that have been ongoing or for which funding has been sought have been ignored. Communications for emergency and transit systems are woefully inadequate and a threat to safe operations and the public. It is unclear what an Intelligent Mobile Observation System is that is mentioned on page 67 of the plan, and the only mention of it in Appendix B looks very different than what is described relative to the Department of Homeland Security on page 67. When the TTD Board adopted its transit master plan in 2017, it also adopted a goal of creating a traffic control center at Tahoe. TRPA staff, along with TTD, have had ongoing conversations with Caltrans during the SR89 Corridor Plan, clearly identifying the need. TTD also recognized our communication difficulty with the Swiftly transit application and the Park Tahoe mobile payment system given the poor rural network the region has. When the fires in California amplified the danger that Tahoe presents for a similar scenario, it led to greater collaboration between TTD and emergency management services, because we recognized our common communication system vulnerabilities. This led to a number of conclusions and new partnerships with emergency services in the two states, with the broadband efforts, and the smart cities efforts of the two states and federal government. With TTD facilitation, DHS did a feasibility analysis for a co-located emergency dispatch and traffic control center now moving into the preliminary project planning phase. TTD has also partnered with local fire agencies to secure funds to achieve improved wireless network for emergency and other communications. Lastly, TTD has been working with the two states to get broadband fiber into the basin and into the conduit that the dig once policy is supporting. It should be noted that dig once does not always mean fiber optic is installed, it may only mean that conduit is installed. It is critical for regional partners to identify linear projects that align with the needed fiber optic network needed, as a nebulous dig once policy without funding and planning the appropriate network solution will not support the transportation, public safety, telehealth, tele-education, and telework needs of the region. The Bay Area's Metropolitan Transportation Commission recently approved a long-term vision that large employers — defined as any company with more than 25 employees — would be required to have at least 60 percent of their employees telecommuting on any given work day in an effort to curb greenhouse gas emissions and reduce traffic congestion by 2035. As continues to be evident under COVID-19, remote working opportunities by Bay Area workforce has and will continue to influence visitation patterns in the Tahoe Basin and an adequate, broadband, cellular, and radio communications infrastructure is required.

**Recommendation on Technology:** The technology section of the RTP needs to be revised to include TTD's goals and projects. It is important to recognize that broadband, wireless, and radio infrastructure is a transportation system need; and that coordination with first responders, tele-health, tele-education, and tele-work is critical for public safety, the economic vitality of the region, and the visitor experience. These are a cost effective and environmentally sound policy. Waiting for others to address this long-standing issue will continue to ensure that technology based solutions will have significant limitations. Please include a discussion on TRPA's strategy for electrification of transit fleets and also the electrical grid infrastructure necessary to meet ambitious California mandates.

The safety section on page 10 needs to be modified to recognize emergency management needs as they relate to the transportation system utility and role in emergency management. This can be further reinforced on page 72 within policy 3.4 which focuses primarily on the use of the airports. Accordingly, the finance plan should include non-traditional transportation funding sources that can help achieve technology project goals, such as FEMA, DHS, EDA, and USDA for rural broadband.

Another area that does not include all of TTD goals, projects and operations is transit. Page 45 only generalizes consideration of TTD's plans and does not name its transit master plan as is done in other sections. This observation is further supported by the absence of TTD's Linking Tahoe: Lake Tahoe Basin Transit Master Plan in the resource section of the RTP, beginning on page 121. To reach the 2045 goal articulated on page 50 of the draft document, the entirety of TTD's transit master plan will need to be included. TTD supports including the transit master plan and the revenue plan should be amended to reflect the need. Also, we discussed with TRPA/TMPO staff that TTD could reach the 7 to 8% transit mode split by 2035, if revenue like the One Tahoe proposal is enacted and could also reach TTD's 20% transit mode split by 2040, if there was a fully funded program. This would achieve the goal on page 50.

TTD notes that the stated goal on page 51 is that all micro-transit will be free to the rider, yet the finance plan identifies that service as unconstrained, so how will it be achieved? What are the performance measures for micro-transit? TTD sees in the transit project list that TRPA is identified as the lead for mobility hub capital and operations. Staff would like to have further discussions in what that means and how that will be achieved; as TTD is already underway with a second mobility hub by acquiring the school site in Incline, and is being asked of its interest in Meyers. Also, TTD's US 50 SSCR project is addressing Tahoe's largest potential mobility hub and that project can use all the financial assistance it can get. The cross-lake ferry project should be a public/private partnership and could utilize other funding sources, such as California Air Resources Board and California Energy Commission funding which should be identified in the funding plan.

There was no discussion on phasing of transit services and associated capital investments. These are not ad hoc projects. They are sequential investments that must occur in order for success. Please note that capital improvements are required prior to delivering service improvements. Without the additional fleet and facilities, the service cannot be delivered.

In the bi-state 10-year list, the cost for the US 50 SSCR is listed as \$156 million, not \$100 million. This was discussed in the bi-state process, so why is that not reflected in the list? Regarding the last project on the Operations and Maintenance list where over \$578 million of



unconstrained regional deferred O&M is attributed to NDOT...Is that accurate or is it a regional road catch-all for local maintenance?

**Recommendation:** TTD and TRPA transportation staff meet to discuss the project list, transit, etc. to understand and make amendments.

### **Appendix C. Revenue Narrative**

It would be helpful to include a brief description under the federal section describing how USDOT is encouraging regions to develop their own funding sources and to monetize the transportation system for revenue for further transportation investment. TTD applauds and supports the inclusion of a regional revenue source. TTD encourages that a game plan and revenue be included in the first five years, as the momentum exists to act now, knowing that it will take time to put in place.

As noted in Financial Planning and Fiscal Constraint for Transportation Plans and Programs Questions & Answers prepared by FHWA, revenue forecasts that support a Statewide Transportation Improvement Program (STIP), metropolitan transportation plan, or a metropolitan Transportation Improvement Program (TIP) may take into account new funding sources and levels of funding not currently in place, but which are "reasonably expected to be available" [see 23 CFR 450.216(m), 23 CFR 450.322(f)(10)(ii), and 23 CFR 450.324(h), respectively]. In addition, future revenues may be projected based on historic trends, including consideration of past legislative or executive actions. New funding sources are revenues that do not currently exist or that may require additional actions before the State DOT, MPO, or public transportation operator can commit such funding to transportation projects. To be considered "reasonable," the financial information and financial plans that accompany the TIP, STIP, and metropolitan transportation plan must identify strategies for ensuring the availability of these new revenue sources in the years when they are needed for project development and implementation [see 23 CFR 450.216(m)].

Determining whether a future funding source is "reasonable" requires a judgment decision. Two important considerations in determining whether an assumption is "reasonable" are:

- (a) evidence of review and support of the new revenue assumption by State and local officials; and
- (b) documentation of the rationale and procedural steps to be taken with milestone dates for securing the funds.

This section should clearly identify the regional revenue consistent with requirements under the CFR referenced above.

It is unclear between the revenue section and the project/service list what these funds are attributed too. It would be helpful to have a clear association of fund source to project/service type. And with the dollar amounts cited for the next periods, it appears that only some transit operations will be achieved. In the table of sources, it would be helpful to include the historical assumption amount TRPA is expecting to be annualized, based on its analysis for this section. A number of funding sources identified in the table on pages 153-156 identify TRPA as the recipient. Shouldn't Basin Entities be listed as the recipients? This is especially true for the discretionary sources that TRPA is not eligible for and does not typically apply for those funds.

Complicating the fiscal forecasting is a lack of discussion regarding required local support for formula and competitive grant sources. The vast majority of government funding programs require robust local matching funds that simply are not available. Even if there are formula or competitive funds available, the ability of the region to actually use those funds is dependent on local revenue support, which is largely absent. Without discussing the matching requirements necessary to leverage the various funding sources, the revenue narrative misleads the reader by presenting “available funds” synonymously to “useable funds.”

On page 157, the assumption that private funds will operate a ferry is wrong. It will require subsidy and, likely, fares. If it could function profitably as a private enterprise, it would. It is a candidate for a public private partnership.

Please note whether public funds are anticipated for use on non-publicly managed contracted services. For example, the North Shore micro-transit pilots. Is TART expected to fund these as contracts using public dollars, or will these be managed and funded by private/non-profits? Please add some discussion as to why TRPA anticipates private investment in transit shuttles will increase in the RTP period and how TRPA is planning to encourage new, privately funded, non-publicly subsidized transit services.

Please explain the farebox bus revenue projection on page 159, when the plan is calling for free to the rider transit service. How does this work and why should over \$103 million in farebox recovery be included in the finance plan?

Under state sources, TTD did not see any identified Nevada state sources of funds. Is nothing expected of Nevada over the next twenty-five years? To what can the \$60 plus million of prior state funds be attributed? Furthermore, funding sources from the Air Resources Board and California Energy Commission should be identified.

Under federal funds based on past practice, TTD would like to understand the basis of expectation for \$22 million from the Federal Lands Transportation Program. The Federal Lands Access Program (FLAP) funding projection is unrealistic, at least in terms of timing as California’s call for projects will be in the beginning of fiscal year 2026, beyond the first period of the plan, and Nevada’s call for projects will begin in fiscal year 2025. Assuming FLAP continues to be funded, it is possible that over the life of the balance of the plan, \$40 million may be won for Tahoe, but it will not be arriving soon and certainly not in time to support the short list of priorities. What is the realistic source of \$25 million in USFS funds within the next five years? Given the match requirements to successfully compete for BUILD, what is the assumption for match and for what project does TRPA think this will realistically apply? TTD is concerned that the picture for the first five years is not as obtainable as projected in this plan. This is critical to answering the public questions on what is the vision and how long will it take to be delivered, as well as what will be delivered.

**Recommendation:** TTD and TRPA staff meet and discuss to understand and amend. Also recommend a robust discussion with the TTIC, since this is a key strategic component of addressing the future, including the regional revenue discussion.

## **Appendix F. Environmental Justice**

General observations:

- Page 218- Missing period after age; there is no age limit on driving; older adults usually stop driving due to a medical condition.
- Page 220- There have been two transit stops (450 ft and 1,000 ft) near Tahoe Verde since 11/1/2018

## **Appendix G. Data and Forecasting**

For more than forty years, the transportation needs in the Tahoe Basin have been a response to annual visitation, what has been termed in Tahoe as recreation travel. TTD is confused with significant shifts in descriptions of resident, visitor, and commuter trends used to model the RTP and the lack of clarity between travel types identified in the RTP and the VMT analysis. For example, in the 2017 RTP, daily trip accounting for the descriptors of Everyday Tahoe, Discover Tahoe, and Visit Tahoe were 20%, 55%, and 25% respectively. In the 2020 RTP, the accounting is 51%, 38%, and 11% respectively. That is a big shift without any reconciliation. Also, day use assumptions do not seem reasonable. TTD is also puzzled by such different entry point percentage data from the work done for the last RTP. While TTD realizes that the VMT threshold work has been on its own track and that the current RTP draft does acknowledge now that both are proceeding to adoption at the same time, it would be helpful if there was a clear linkage between the goals, objectives, and outcomes identified in the RTP, the metrics used in the VMT mitigation, and fee structures proposed, because it is difficult to see how all of these items work together.

Using the 2014 population data sets for the Northern California Megaregion (NCRM), the weighted annualized population growth rate 2014 to 2035 was about 1.0% in many previous planning efforts (2016 RTP, The Corridor Connection Plan, TTD's long and short range transit plan, the Trans Sierra Transportation Plan). According to the AirSage data, a bit more than 75% of the Tahoe visitors came from the NCRM, so using the 1% annual growth in visitation at that time was reasonable.

Based on the most recent California Department of Finance population projections from January 2020 and the Nevada State demographer projections from 2019, there have been some pretty dramatic downward revisions to the California projections since 2014 and also in Nevada. If we look at the growth for the NCRM from these data sets, the weighted annualized growth rate for 2020 to 2045 is about 0.62%. This is a significant decrease from the annualized rate derived from the 2014 AirSage data.

The annualized visitation growth rate for the 2020-2045 RTP update appears to be 0.32%, which is about 1/2 of the 0.62% cited above.

Local government population forecasts are typically higher than the state forecasts in both Nevada and California, and the local forecasts are typically more accurate. Previous population trends of Tahoe were on that downward trajectory and current trends proposed over the life of the plan are forecasted as a 12.4% increase in population. Recent school enrollments and a booming housing market have surely shifted population forecasts on a more upward trajectory than has historically occurred given efforts in housing, tele-work, tele-education opportunities; however, local jurisdictions should confirm this value.

Perhaps more important is this: It is typically not a question of “if” we will reach these population/visitation numbers but “when”. We know the megaregion is growing, even if we see shifts in local population, commuter, and visitation, Tahoe will still continue to be a popular place to visit from a readily drive-up market. If you plan a transportation system to accommodate a population and/or visitation number by some future year, you will reach this number sooner or later. If sooner, this might be a 2040 plan; if later, maybe a 2050 plan. What doesn’t change is the system necessary to service the future projected level of population/visitation and developing a means to obtain the necessary funding, monitor the system and adapt to the demand. Similarly, if things happen sooner or later, the amount of revenue (constant dollars) doesn’t change, just the timing of when you need it. What is changing is the amount available through discretionary sources is decreasing dramatically and Tahoe doesn’t compete well with the urban areas, because Recreation Travel is not accounted for in State or Federal priorities.

Furthermore, TTD is concerned that the approach developed to comply with SB375 and SB743 proposed to mitigate VMT within the Tahoe Basin through a per capita basis on projects does not capture the tremendous visitor impact on the transportation system and only further hinders revitalization of our communities and successful implementation of transportation solutions in a timely manner. The policy behind this is clearly intended for new development and assumes a growth in population; however, projects in the Tahoe Basin are almost entirely redevelopment and recreation based day use is growing, due to megaregional population and development outside of the Tahoe Basin. The concern is that the focus on project and per capita VMT reduction undercuts the argument to address the visitation demand. The VMT impact should be captured directly from the source vehicle. That way, the full system can be implemented more effectively, mitigating the full built environment in place since the ‘80’s and the new project mitigation can be proportional to support the fuller system if needed.

A goal could be a more modernized approach to develop the VMT fee structure and data system through a Smart Cities or a Smart Region approach. A smart region is not only a set of technological tools and solutions, but also a live network communication system that can aggregate almost real-time data through sensors that create efficiencies in governance, infrastructure, transport, economy, science, technology, and data. A recent study prepared by the City of Seattle analyzed VMT reduction of cordon pricing or congestion pricing systems around the world and found that VMT was reduced anywhere from 12 to 55% through adequate reinvestment into a multi-modal transportation system within and around the instituted cordon systems. A Smart Regional cordon/congestion pricing system has the ability to provide accurate data driven planning and decision making; flatten the peak demand and distribute use; optimize infrastructure, recreation, and business access; increase carpooling rate and reduce VMT from source; improve emergency response and evacuation; increase broadband and communications; provide an affordable, accessible, and good visitor experience; decrease vehicle hours travelled due to reduced traffic congestion; increase vehicle fuel efficiencies due to better management of system; decrease accidents due to reduced traffic congestion and fewer secondary incidents; and decrease the need for roadway capital improvements, due to more efficient traffic management.

Tahoe’s resident population and businesses are too small to pay for the types of improvements needed to address the millions of visitors who arrive mostly by personal vehicles. A cordon pricing system could help fund the vision of the RTP and assure that the actual value of the VMT is accounted for efficiently and effectively.

**Recommendation:** TTD and TRPA staff meet and discuss the cost benefit of the VMT per capita project approach versus a Smart Region Cordon/Congestion Pricing approach to VMT and data collection. It would be helpful to understand what proportion of a multi-modal system implementation is expected to be provided by project mitigation versus public investment in a full system establishment. Include a robust discussion and recommendations from the TTIC since this is a key strategic component of addressing VMT, future investments, and assuring there is adequate regional revenue and a sustainable economy. This discussion can fit into the other benefits of establishing a cordon fee and how the picture can evolve even between this RTP and the next, given the push on climate actions anticipated from the Caltrans 2050 Plan draft.

## **Appendix H: Congestion Management Process**

In this section, congestion is highlighted as occurring on busy skier weekends and particularly when skiers are exiting the Basin on a Sunday.

**Recommendation:** Expand the periods of congestion to reflect the shrinking shoulder seasons. The Sunday exodus is an extreme gridlock situation and exhibits a recurring extremity. As it reads, it seems to downplay the congestion typical during the summer and winter seasons.

## **Appendix I: Performance Measures**

These comments relate to Appendix A as well and are general in nature. As a reader and an implementer, it is difficult to ascertain what both policy goals and performance measures tell us about a multi-modal system operation achievement, and implementation impact systemically. It seems that what is addressed by both are pieces, but are they representative of the whole? It is unclear, and, as an implementing agency, TTD sees little in them that helps tell the story about what foundational system pieces need to be in place to achieve the goals and performance measures. This in turn limits the collective ability to make the case for certain improvements and operations.

To illustrate, in one calculation, Daily Trips includes scooter use. From a trip perspective, is that calculated and equated to vehicle trips in the same way as transit and autos? Does it remove users who do not drive from the tally because they would not have been in a car. Does it account for what would have been a pedestrian trip into a shared micro-mobility trip? The non-auto mode share shows growth of 6.5% since 2016 which is great news, and now 24.5% non-auto mode share, yet we still have tremendous auto use. So how much non-auto mode share do we need to achieve to make a difference? Systemically, what components need to do more to make better progress?

**Recommendation:** Beginning with TTD and TRPA, a discussion of how policy goals and performance measures could be more useful in advancing system success. If agreeable, TTD suggests it is worth having discussions with the TTAC and TTIC in thinking about the next RTP update, discussions on new data and analysis to advance program implementation, and how we may be able to collectively speak to performance measures and policy goals in a more knowledgeable way.

## **RTP Development and Review Process**

TTD appreciates the fact that putting together an updated RTP is not an easy process. Nor is the review of a fully drafted RTP. Now that the TTIC is in place, and with an eye to the future, TTD feels it would be more productive for TRPA and transportation stakeholders, if the draft RTP were prepared in pieces where both the scope, strategy, and write ups are reviewed and critiqued with the TTIC, in advance of a draft for general public release and comment. The draft would be more reflective of the community, with less comment or changes, and perhaps a better product that can be more enthusiastically endorsed.

**Recommendation:** The next update process uses the technical group as a working group in the outline scope, draft review, and strategy development in advance of a full draft release to the public.

Thank you

## Michelle Glickert

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**From:** Michelle Glickert  
**Sent:** Wednesday, October 28, 2020 1:18 PM  
**To:** Joe Shaefer  
**Subject:** RE: Seriously, a transportation hub HERE?

Thank you Joe for taking time to express your opposition to a transportation hub at the Incline Elementary school site. I will record this comment and share with the Tahoe Transportation District as well.

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



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**From:** Joe Shaefer <joe@jlshaefer.com>  
**Sent:** Sunday, October 25, 2020 12:21 PM  
**To:** Michelle Glickert <mglickert@trpa.org>  
**Subject:** Seriously, a transportation hub HERE?

Re the TTD plan to ignore Incline Village residents -- owners and renters -- rights in favor of attracting more tourists to the basin:

Dear Ms. Glickert:

The property TTD purchased from WCSD is the only piece of property left in Incline upon which to build subsidized housing for teachers, police, caregivers and fire personnel currently commuting from Reno.

The property TTD purchased from WCSD is the only piece of property left in Incline upon which to create an expanded community center (to which it is contiguous.)

The property TTD purchased from WCSD is at the hub of one of the 2 busiest intersections in Incline Village. It can barely sustain

the traffic that already visits our small community center, but it cannot sustain further tourist traffic and most certainly cannot sustain bus traffic at that intersection.

There is another property in Incline where there is a defunct restaurant. If TRPA is going to permit (and issue a permit for) the abomination of inviting even more pollution and runoff into the lake from increased automobile traffic, trash and raw sewage, I request that TRPA seriously consider the environmental and congestion problems this ill-conceived "plan" the TTD is attempting to push through by using the confined space they are currently pursuing versus other options.

This village is not a Disney theme park. I have no doubt our residents will pursue all legal means to prevent it from becoming one.

With best regards,  
Joseph L. Shaefer  
Brigadier General, USAF, Ret.



## Michelle Glickert

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**From:** Denise Davis <ddavis\_remote@hotmail.com>  
**Sent:** Sunday, October 25, 2020 5:49 PM  
**To:** Michelle Glickert  
**Subject:** Comments regarding the TRPA Regional Transportation Plan

**Follow Up Flag:** FollowUp  
**Flag Status:** Flagged

Denise Davis  
PO Box 3876  
Incline Village, NV 89450

Comments regarding the TRPA Regional Transportation Plan

I'm a full-time resident of Incline Village since 1995. The home I own and have lived in for the past 16 years is located across the highway from the parking lots for the East shore shared-use path; most of my house faces SR 28, so I experience the highway 24 hours a day.

I attended the Tahoe transportation webinars held in April and May of this year and have also read through the Regional Transportation Plan Draft.

My first comment concerns all of the visitor authorities. Since they are involved with bringing visitors in, they need to be involved with dealing with those visitors when they're here. Because the majority of visitors to the Tahoe basin are more likely to interact with one of these agencies than with the TRPA, the majority of making the public aware needs to come from the visitor authorities. Visitor authority info can add transportation info and URL/QR codes for more detailed information. Also, there needs to be as much emphasis on keeping cars out of the basin as there is what to do with the cars that are in the basin.

Second, while encouraged by the promise of buses for day trippers from the Reno and Carson City areas, I fear it will operate as poorly as previous efforts and end. I understand the TRPA is asking for comments regarding the Plan draft, but there is a lot of frustration in the Incline area with TTD and we don't know where to turn for help. It has been extremely disappointing to hear Mr. Hasty report year after year that there are no funds available for buses to run between Reno/Incline and Carson City/Incline. (Meanwhile, he's located millions for the proposed mobility hub in Incline.) We are also told it's been tried and it failed. I believe a large part of that failure can be attributed to the unreliability of the service. In previous years, a bus

ran in the summer from Carson City to the lake; two complaints I heard about it were it often didn't run and it only made limited trips. (I believe it left Carson at 8 or 9 am and didn't make return trips to Carson until 4 pm.) If people know they can come and go more frequently than once or twice a day, they may be willing to give up the hassles of driving. Providing parking lot security (for personal safety as well as property) would also increase confidence in using public transportation services.

Third, I've seen no effort to address the needs of work commuters, either between Reno/Incline or Carson City/Incline. The traffic starts picking up soon after 6 am behind my house; it varies little throughout the year. When I drove from Reno just after 5 pm on 10/23/2020, the traffic headed to Reno was bumper to bumper all the way from Reno to Incline. If incentives made it cheaper to ride the bus than drive, and bus service started early enough to get them to work on time, I'm guessing many would be happy to give up the driving. Ask people who drive to work at the lake what they would use, instead of deciding on a service schedule and then expecting everyone to alter their day to fit it. Help businesses be able to offer it as part of, or in addition to, employee compensation.

Fourth, in regards to the "Discover Tahoe" and "Visit Tahoe" visitors, there needs to be frequent, reliable public transportation around the lake. Visitors would be more willing to use public transportation if there was a "hop on / hop off" option around the lake and the buses ran frequently. I've personally heard Mr. Hasty state he is NOT interested in any hop on/hop off system. Why not? My husband and I have used that option many times while traveling and it seems to work well for visitors and communities alike. The only frustrations I've encountered are when the service is unreliable or doesn't run often enough. If multiple short segments were organized so as to keep riders waiting less than 15 minutes, I believe it would prove successful. The current bus routes don't connect and the wait times are too long. Microtransit solutions may prove to be a better option than full-size buses.

Fifth, while 'Safety' is one of the Plan's Regional Goals, it does not address the general safety of all residents of the basin. Maybe that's not TRPA's duty or objective, but it seems a glaring omission. Our roads are already clogged with traffic on the roads and blocked by parked vehicles on the sides of roads – people will not be able to evacuate the basin in the event of fire or natural disaster. I speak from first-hand experience in a wildfire. When it takes an hour to creep the 2 miles between Incline's Lakeshore Boulevard and Sand Harbor or over an hour to crawl from Safeway in Kings Beach to the Crystal Bay Club (both of which I personally experienced in 2019), how is there any reasonable expectation of being able to evacuate the

basin? I've talked with emergency personnel from different agencies and they can't get around any faster than the rest of us. This means there are delays getting help to emergency situations because we don't address our problems with traffic.

Sixth, I will add my voice to those who oppose the proposed mobility hub at the former Incline Elementary School site. I lived one block north of the school for many years while it was still in operation and can detail what a mess the area was with the school traffic. I can't imagine traffic for the mobility hub would have a much different result. I'm not opposed to a mobility hub – I'm opposed to the old school location. A question I continue to ask is why the former Orbit gas station site on the west side of Incline will not be considered for this purpose. It has environmental issues that likely only TRPA and its resources would be able to address. There is currently a large parking lot in existence; while it would have to be reconstructed, it is an area that is already affected by contaminants from parked vehicles. Prevent contamination of a new spot by using an existing area. The site is large and relatively flat, close to the roundabout for Mount Rose Highway and at the end of the walking path for Lakeshore Boulevard. While there is still residential housing in the area, it is far less dense and overcrowded with vehicles than the old school location. This could be a win for everyone involved – environmental cleanup and a traffic solution. Again, I understand that this issue is not directly in regards to the Plan draft, but Incline finds itself in the position of having the old school location forced on us and we're reaching out for help. We already deal with the results of some of the short-sighted decision making used for the East Shore shared-use path; we'd like to avoid living with more of those short-sighted decisions.

Lastly, I would comment that public transportation will not solve every resident need. In the case of Incline, we generally need to travel out of the basin for medical services beyond routine doctor visits or immediate emergency care. Not everything we need to purchase can be shipped to us.

## Michelle Glickert

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**From:** Michelle Glickert  
**Sent:** Wednesday, October 28, 2020 2:30 PM  
**To:** Jon Davidson  
**Subject:** RE: Transportation Hub at old elementary school in Incline Village

Thank you Jon and Beth for taking the time to express your opposition to the Incline transit hub as proposed by TTD. I will record your comment and share with the Tahoe Transportation District. If you have not already, please sign up for TRPA e-news ( <https://www.trpa.org/about-trpa/press-room/> ) to keep up to date on transportation and other agency initiatives.

Michelle Glickert  
Principal Transportation Planner  
(775) 589.5204  
mglickert@trpa.org

-----Original Message-----

From: Jon Davidson <jonpauldavidson@gmail.com>  
Sent: Sunday, October 25, 2020 6:35 PM  
To: Michelle Glickert <mglickert@trpa.org>  
Subject: Transportation Hub at old elementary school in Incline Village

Please DENY a TRPA Permit for the above use. My wife and I have lived in Incline Village since 1981 and have seen the incredible growth of traffic coming to and through Incline.

We applaud the attention being given by various agencies to try to manage this growth. However, it seems that the current head of the Washoe County Transportation District has chosen to completely ignore the reasonable requests of Incline community members who have not only requested that the school site in the center of a busy neighborhood (primarily Hispanic with many young families) and shopping area NOT be located there BUT have also suggested far better alternatives such as the the long vacant large area on the main street (route 28) at the edge of town going toward Sand Harbor that has undergone remediation for leaking gas tanks from an old gas station. Another similar site exists on the west end of town which formerly held another gas station and restaurant. Either or both of those sites make better sense for the type of park and ride operation being proposed by the Washoe County Transportation District rater than in the center of town which already sees a lot of Post Office, shopping, grocery and restaurant traffic, as well as neighborhood traffic from the many apartments there.

Please do not allow the county to callously ignore the reasonable requests of individuals from Incline, so vehicles can be parked at the old school site during construction or the next phase of the bike path to Crystal Bay. This,apparently,is at least part of the reason for the rushed approach to buying the old school site.

Thank you for considering our request for denial of a TRPA permit.

Jon and Beth Davidson

## Michelle Glickert

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**From:** Michelle Glickert  
**Sent:** Wednesday, October 28, 2020 3:25 PM  
**To:** Winqest, Indra S.  
**Subject:** RE: Public Input on the Regional Transportation Plan

Indra, thanks for taking time prepare a comment and express your opposition to a transit ferry stop in Incline. I would like to take you up on your offer to learn more about IVGID to ensure the RTP is portraying Incline projects and IVGID accurately.

How does 10 am next Tue 11/3 or Thr 11/5 work for you?

Thanks again,

**Michelle Glickert**  
**Principal Transportation Planner**  
**(775) 589.5204**  
[mglickert@trpa.org](mailto:mglickert@trpa.org)



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**From:** Winqest, Indra S. <ISW@ivgid.org>  
**Sent:** Sunday, October 25, 2020 8:29 PM  
**To:** Michelle Glickert <mglickert@trpa.org>  
**Subject:** Public Input on the Regional Transportation Plan

Hi Michelle –

I am writing because I have had an opportunity to read through the draft Regional Transportation Plan. I applaud the effort to evaluate and provide solutions to the Transportation issues in the basin as although I live in Reno now, I lived in the basin for 21 years including Meyers, South Lake Tahoe, Round Hill, Cave Rock, and Incline. I have seen so much change over the years and as we all know the Basin is now overwhelmed so solutions are crucial and IVGID is happy to be part of the discussion and collaboration. This being said, I want to point out that we are a General Improvement District and not a glorified HOA as some seem to think. I will also remind you that the IVGID beaches are restricted access to Incline Parcel Owners and their guests. We would not be able to accommodate a Transit Ferry as we do not have the infrastructure and more importantly, as mentioned the IVGID beaches are deed restricted.

I would happy to meet with you and your respected team if you feel it would be beneficial to get a better understanding of IVGID and get some insight on our end. Thanks again for working to improve the overall health of the basin.

Cheers, Indra

**Indra Winqest**

General Manager

Incline Village General Improvement District

893 Southwood Blvd, Incline Village NV 89451

P: 775-832-1323

F: 775-832-1380

[isw@ivgid.org](mailto:isw@ivgid.org)

<http://www.yourtahoeplace.com>



## Michelle Glickert

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**From:** Michelle Glickert  
**Sent:** Monday, October 26, 2020 8:04 AM  
**To:** Michele Koch  
**Subject:** RE: Old Incline Elementary School property

Good morning Michele, thanks for taking time to share your valuable insights into the needs of Incline residents. I will incorporate these into the comment log. Please stay up to date on the Final 2020 Plan timeline at our project web page - <https://gis.trpa.org/rtp/>. You can also sign up for transportation e-news at this site as well.

Thank you,

Michelle Glickert  
Principal Transportation Planner  
(775) 589.5204  
[mglickert@trpa.org](mailto:mglickert@trpa.org)

-----Original Message-----

**From:** Michele Koch <[michelejbk7@gmail.com](mailto:michelejbk7@gmail.com)>  
**Sent:** Sunday, October 25, 2020 10:16 PM  
**To:** Michelle Glickert <[mglickert@trpa.org](mailto:mglickert@trpa.org)>  
**Subject:** Old Incline Elementary School property

Ms. Glickert,

As an Incline resident for over 24 years and a business owner in the Village, I would like to let you know that I'm opposed to the Tahoe Transportation District's plans to turn the Old Elementary School property into a bus hub to transport tourists to Sand Harbor. I'm aware that I have the privilege of living and working here and welcome sharing God's gift with others. However, there are other options for a transport station that won't gravely effect the function of our little community which DOES NOT have the infrastructure to support what will happen if this permit is passed. Please do not allow TRPA to provide a permit for this use of land.

Respectfully,  
Michele Koch

Sent from my iPad

Attachment D  
2020 RTP/SCS Findings



# REGIONAL TRANSPORTATION PLAN AND SUSTAINABLE COMMUNITIES STRATEGY: LINKING TAHOE

## APPROVAL FINDINGS

### SECTION A. CHAPTER 3 -- REQUIRED FINDINGS:

1. Finding: The proposed project could have a significant effect on the environment, but due to the listed mitigation measures which have been added to the project, could have no significant effect on the environment and a mitigated finding of no significant effect shall be prepared in accordance with TRPA's Rules of Procedure.

Rationale: Based on the completed California Environmental Quality Act Initial Study/Negative Declaration and TRPA Initial Environmental Checklist/Finding of No Significant Effect (IS/IEC), no significant environmental impacts have been identified as a result of the proposed Regional Transportation Plan/Sustainable Communities Strategy (2020 RTP/SCS). The IS/IEC evaluated the potential environmental impacts of the 2020 RTP/SCS and tiers from the TRPA/Tahoe Metropolitan Planning Organization (TMPO), *Mobility 2035: Regional Transportation Plan/Sustainable Communities Strategy EIR/EIS*, certified by the TMPO Board and the TRPA Governing Board on December 12, 2012 (RTP EIR/EIS).

The 2020 RTP/SCS evaluated by the IS/IEC makes some changes to the constrained project list, the vision, goals, policies, and programs of the 2017 RTP and includes the 2012 RPU land use strategy. The IS/IEC therefore analyzed the environmental impacts arising from changes over the existing 2012 and 2017 RTPs.

The IS/IEC is a program-level environmental document. All future projects identified in the IS/IEC are subject to the appropriate project-level environmental review and permitting. Project-level environmental documents will require identification of, and mitigation for, any potentially significant environmental impacts.

**SECTION B: TRPA CODE CHAPTER 4/COMPACT ARTICLE V(G) – REQUIRED FINDINGS:**

**TRPA Code Section 4.4 – Findings to Amend the Regional Plan, Including Goals and Policies, Code of Ordinances or Other Implementing Plans:**

1. Finding: The 2020 Regional Transportation Plan/Sustainable Communities Strategy is consistent with and will not adversely affect implementation of the Regional Plan, including all applicable Goals and Policies, Plan Area Statements and maps, the Code and other TRPA plans and programs.

Rationale: Based on the analysis in the TRPA Staff Reports for the 2012 and 2017 Regional Transportation Plans, the 2020 RTP/SCS IS/IEC, and the 2015 Threshold Evaluation (November 2016) the Governing Board finds the amendments to the Linking Tahoe: Regional Transportation Plan(RTP), are consistent with, and will not adversely affect implementation of the Regional Plan, including all applicable Goals and Policies, Plan Area Statements and maps, the Code, and other TRPA plans and programs (as amended).

As described in the accompanying Staff Report and the IS/IEC, the RTP amendments to TRPA’s Transportation Goals and Policies, and the RTP itself complement and accelerate implementation of the Regional Plan and its objectives: achievement and maintenance of Thresholds while planning for reasonable growth. As explained in the approval consistency findings below and in the IS/IEC, the 2020 RTP/SCS is consistent with the Regional Plan, including all applicable Goals and Policies, plan area statements and maps, the Code and other TRPA plans and programs with the mitigation measures included in the project. The approval findings relating to consistency and IS/IEC consistency analysis are incorporated herein by reference.

The Goals and Policies amendments and the 2020 RTP/SCS are otherwise consistent with and will not adversely affect all applicable compliance measures, indicators, additional factors and supplemental compliance measures and attainment of target dates as identified in the 2015 Threshold Evaluation.

For the 2020 RTP/SCS and the amendments’ specific mitigation measures, TRPA has identified in the IS/IEC an adequate means by which the mitigation measure’s effectiveness will be

evaluated. To the extent that the amendments or the 2020 RTP/SCS would result in direct or indirect physical environmental effects, the IS/IEC addressed all such effects. Therefore, no further mitigation is required.

Based on the foregoing and findings 2, 3 and 4 below, the Governing Board finds that adopting the 2020 RTP/SCS and RTP amendments will not adversely affect implementation of the entire Regional Plan, including all applicable Goals and Policies, Plan Area Statements and maps, the Code and other TRPA plans and programs (as amended).

2. Finding: The Goals and Policies amendments and the project itself will not cause the environmental threshold carrying capacities to be exceeded.

Rationale: Based on the rationale for the foregoing finding, the analysis in the IS/IEC, the Staff Report, and TRPA Compact V(g) Findings below, and the 2015 Threshold Evaluation, the Governing Board finds Goals and Policies amendments and the 2020 RTP/SCS will not cause the environmental threshold carrying capacities to be exceeded.

This conclusion is based on the status review of the Threshold Standards in the 2015 Threshold Evaluation including target dates, interim targets, and compliance measures needed to achieve and maintain thresholds and the IS/IEC.

As discussed in the IS/IEC, there are no unmitigated adverse impacts to the Thresholds. The IS/IEC evaluated the proposed Goals and Policies amendments' potential impacts on environmental threshold carrying capacities. As explained in the Compact Article VII(d) and Chapter 3 Findings, which are incorporated herein by reference, changes or alterations have been required in or incorporated into the proposed amendments and project which avoid or reduce any significant adverse environmental effects of proposed amendments to a less than significant level.

3. Finding: Wherever stricter federal, state or local air and water quality standards apply for the Region, pursuant to Article V(d) of the TRPA Compact, the Goals and Policies amendments and the project itself meets or exceed such standards.

Rationale: Based on the rationale for the foregoing findings, the analysis in the IS/IEC and TRPA Compact V(g) Findings below, and the 2015 Threshold Evaluation, the Governing Board finds the Goals and Policies amendments and the 2020 RTP/SCS will not cause the federal, state and local air and water quality standards applicable for the Region to be exceeded.

Neither the Goals and Policies amendments, nor the RTP, themselves, affect or change the federal, state or local air and water quality standards applicable for the Region. As disclosed in the IS/IEC, these standards were used as criteria of significance where applicable and no unmitigable impacts were found.

4. Finding: The Regional Plan, as amended, achieves and maintains the thresholds.

Rationale: **I. Introduction**

In 1980, Congress amended the Compact to accelerate the pace of environmental progress in the Tahoe Region by tasking TRPA with adopting a regional plan and implementing regulations that protect the unique national treasure that is Lake Tahoe. First, Article V (b) required that TRPA, in collaboration with Tahoe’s other regulatory agencies, adopt “environmental threshold carrying capacities” (thresholds or standards) establishing goals for a wide array of environmental criteria, including water quality, air quality, and wildlife. Second, Article V(c) directed TRPA to adopt a regional plan to “achieve and maintain” these thresholds, and to “continuously review and maintain” implementation of the plan.

The 1980 Compact instated an era of establishing and enforcing rigorous controls on new development. In 1982, TRPA adopted the necessary thresholds for the Tahoe Region. These thresholds are a mix of both long- and short-term goals for the Tahoe Region. The Region was in attainment of a number of these thresholds shortly after the adoption of the Regional Plan and remains in attainment today. Other thresholds address more intractable issues; for example, TRPA established numeric water quality standards that, even under best-case conditions, could not be attained for decades. *See, e.g., League to Save Lake Tahoe v. Tahoe Reg’l Planning Agency*, 739 F. Supp. 2d 1260, 1265 (E.D. Cal. 2010).

The second phase in this process was establishing a regional plan that, when implemented through rules and regulations, would ultimately achieve and maintain these thresholds over time. In 1987, following years of negotiation and litigation, TRPA adopted its Regional Plan. The 1987 plan employed a three-pronged approach to achieve and maintain the adopted environmental standards. First, the plan established a ceiling on development in the Region and restricted the placement, timing, and extent of new development. Second, the plan sought to prevent new harm to the environment as well as repair the environmental damage caused by existing development, particularly for projects that pre-dated TRPA's existence. To this end, the plan created incentives to redevelop urbanized sites under more protective regulations and to transfer development out of sensitive areas that would then be restored. Third, TRPA adopted a capital investment program that was largely but not exclusively publicly funded to achieve and maintain thresholds by improving infrastructure and repairing environmental damage. In 1997, TRPA replaced this program with its Environmental Improvement Program (EIP). In subsequent years, TRPA generated investments of well over \$1 billion in public and private money to restore ecosystems and improve infrastructure under the EIP. Recent litigation confirmed that the Regional Plan as established in 1987 and subsequently amended over time will achieve and maintain the adopted environmental thresholds. *Sierra Club v. Tahoe Reg'l Planning Agency*, 916 F.Supp.2d 1098 (E.D. Cal. 2013).

### **(1) Regional Plan Update Process**

Even though implementation of the 1987 Regional Plan would achieve and maintain the thresholds, in 2004 TRPA began public outreach and analysis of the latest science and monitoring results to identify priority areas in which the Regional Plan could be comprehensively strengthened to accelerate the rate of threshold attainment. TRPA's policymakers realized that the challenges facing the region differed from those confronting the agency when it adopted its original Regional Plan in 1987. Uncontrolled new growth that had been the primary threat decades earlier had been brought into check by the strict growth limitations in the 1987 Plan. Contemporary problems differed, resulting from the continuing deterioration and lack of upgrades to existing legacy development. In essence, to make the greatest

environmental difference, the Tahoe Basin needed to fix what was already in place. In addition, TRPA realized some existing land-use controls could be improved to remove barriers to redevelopment that would address ongoing environmental degradation caused by sub-standard development constructed before TRPA had an adopted Regional Plan or even came into existence. Land use regulations and public and private investment remain essential to attaining the thresholds for Lake Tahoe.

Furthermore, TRPA recognized that the social and economic fabric of the Tahoe Region could not support the level of environmental investment needed. The economic foundation of gaming had fallen away, and the level of environmental investment needed could not be supported solely by an enclave of second homes for the wealthy. Businesses and the tourism sector were faltering. Affordable housing and year-round jobs were scarce. Local schools were closing, and unemployment was unusually high. In light of these realities, TRPA sponsored an ongoing outreach program to obtain input on how to advance TRPA's environmental goals. Between 2004 and 2010, TRPA conducted over 100 public meetings, workshops, and additional outreach. More than 5,000 people provided input regarding their vision for TRPA's updated Regional Plan. Based on this input, TRPA identified a number of priorities to be addressed by the updated Regional Plan, including:

1. Accelerating water quality restoration and other ecological benefits by supporting environmental redevelopment opportunities and EIP investments.
2. Changing land-use patterns by focusing development in compact, walkable communities with increased alternative transportation options.
3. Transitioning to more permitting by local governments to create one-stop and one permit for small to medium sized projects, where local government wanted to assume these duties.

On December 12, 2012, TRPA's nine-year effort culminated with the approval of the Regional Plan Update.

## **(2) Regional Plan Update Amendments**

The Regional Plan Update (RPU) uses multiple strategies targeting environmental improvements to accelerate achieving and maintaining threshold standards in the Region. First, the

RPU maintained both regulatory and implementation programs that have proven effective in protecting Lake Tahoe's environment. TRPA's regional growth control regulatory system, strict environmental development standards, and inter-agency partnerships for capital investment and implementation (e.g., EIP) remain in place.

Second, the RPU promotes sensitive land restoration, redevelopment, and increases the availability of multi-modal transportation facilities. The implementation of the RPU facilitates transferring existing development from outlying, environmentally-sensitive areas into existing developed community centers. The RPU provides incentives so that private capital can be deployed to speed this transformation.

Third, the RPU authorizes the Area Plan process, pursuant to Chapter 13: *Area Plans* of the TRPA Code of Ordinances, for local jurisdictions in the Lake Tahoe Region in order to address the local issues and opportunities of unique communities in the Region, and to eliminate duplicative and unpredictable land use regulations that deterred improvement projects.

### **(3) The 2020 Regional Transportation Plan**

Every four years TRPA prepares a regional transportation plan that outlines the overall vision for developing, operating, and maintaining the Lake Tahoe Region's transportation system. The 2020 Regional Transportation Plan offers strategies to address the routine travel demands of residents and commuters, as well as the recreational travel demands of visitors that during peak periods stress and cause congestion on Lake Tahoe's transportation system. Strategies focus on projects and programs that dynamically meet the needs of all roadway users by offering better travel mode options, creating incentives that spread out the times, places, and ways people travel to improve traffic flow, and by providing safe and equitable access to all the places people want to go.

The plan in its implementation is a threshold attainment program that delivers increments of improvement to many threshold categories. The plan also serves as the Region's Sustainable Communities Strategy, describing the land-use scenarios and transportation investments that allow the Tahoe

Region to meet its mobile source greenhouse gas emissions reductions targets.

As noted above, a variety of strategies in the Regional Plan and RTP work together to accelerate needed environmental gains in the categories where threshold benefits are most needed – water quality, restoration of sensitive lands, scenic quality advances in developed roadway units, and efforts to continue maintenance and attainment of air quality standards.

#### **(4) The 2015 Threshold Evaluation**

In 2016, TRPA completed the 2015 Threshold Evaluation Report. This report considers conditions relative to 178 standards in nine threshold categories. In general, compared to 2011, more standards showed improvement with attainment moving from 63 percent (58 standards) to 70 percent (77 standards). Status continued to improve for water clarity, air quality, scenic and soil conservation. Areas needing continued focus include removal of land coverage on sensitive lands, new threats to forest vegetation, deepwater plant communities, and the need for continued emphasis on water quality conditions (macroinvertebrates, periphyton (algae) and AIS control).

The next section of this finding establishes how implementation of the 2020 RTP is expected to result in further threshold gain.

## **II. RTP and Threshold Gain**

The RTP accelerates threshold gain, including water quality restoration and other ecological benefits, by supporting environmental redevelopment opportunities and EIP investments. The 2020 RTP does not alter the Regional Plan's established growth control system, the incentives for property owners to hasten the transfer of development rights from sensitive lands or from outlying areas to the Town Center where redevelopment is better suited and will have beneficial or reduced adverse environmental impacts, or any of the EIP restoration program. The RTP will help to promote a sustainable and more efficient transportation system connecting communities and recreation sites.

As described in more specific detail below, the RTP beneficially affects multiple threshold areas.



## A. Water Quality

Lake clarity has continued to improve in recent years. The five-year running average from 2010 to 2015 was 22.3 meters (73.2 feet), 18 feet better than forecasted in 2000. The continued improvement is a strong indication that the actions of partners in the Region are contributing to improved clarity and helping TRPA attain one of its signature goals.

The success of the aquatic invasive species (AIS) prevention program is another notable achievement. Thanks to the inspection of more than 200,000 watercraft prior to launch and the decontamination of more than 44,000 boats, no new AIS have been discovered in Lake Tahoe since the program's inception in 2007.

Signals of improving environmental health are also visible in other water quality parameters. The Threshold Evaluation report shows for the first time that pollutant loads from the non-urban uplands are likely decreasing as the watersheds recover from past disturbance.

The 2020 RTP/SCS benefits water quality thresholds by implementation of projects that will prevent sediment and other pollutant deposition into waterways. The 2020 RTP/SCS includes several operations and maintenance improvement policies and projects aimed at improving water quality in the region. The Tahoe Valley Greenbelt includes water quality enhancements such as improving existing drainage systems to spread, treat, infiltrate, and retain flows from roadways, commercial areas, and other high priority or urbanized areas. Additionally, several shared use and complete streets projects included in the 2020 RTP/SCS include source control, conveyance, and treatment facilities for stormwater runoff as well as improvements to address urban stormwater quality and flooding. Similar to the 2012 and 2017 RTP/SCS, any new development or redevelopment project would be required to comply with existing TRPA, federal, and state regulations pertaining to the protection of surface and ground water quality. In addition, individual projects would be required to complete project specific environmental review and comply with local jurisdictional standards, which would further reduce impacts.

Therefore, the Regional Plan, as amended, will achieve and maintain the water quality thresholds.

## B. Air Quality

The Tahoe Basin has made significant air quality gains. The majority of air quality indicators in the Lake Tahoe Basin were at or better than attainment with adopted thresholds and standards. In total 15 of 16 indicators were in attainment with almost all having improving trends. Two indicators had insufficient data to make a determination (2015 Threshold Evaluation Report, Chapter 3, *Air Quality*). Federal and state tailpipe and industrial emission standards have likely contributed to this achievement along with local projects which delivered walkable, transit-friendly improvements such as the Heavenly Gondola (See 2011 Threshold Evaluation Report at pages 3-14, 3-16, and 3-18; Yang et al. 2010, Park Avenue/U.S. 50 Redevelopment Phase 1, Case Study, available at: <http://lafoundation.org/myos/my-uploads/2012/10/31/park-ave-methodology.pdf>). The Regional Plan and Regional Transportation Plan include a suite of strategies to help the Region meet air quality threshold standards (TRPA Goals and Policies: Air Quality Sub element at pages 2-33 to 2-35; 2020 RTP/SCS Chapter 3, *The Plan*, Appendix B, *Project List and Appendix C, Revenue Narrative*). While there are many programs and policies that contribute to air quality threshold attainment, the two primary regional strategies are:

- 1) Supporting environmental redevelopment. Land Use policies outlined in the Regional Plan support clustering population and employment in compact Town Centers that are well served by transit, pedestrian, and bicycle infrastructure. The Regional Plan achieves this by incentivizing redevelopment and transfers of development from outlying and sensitive areas into existing Town Center areas. (TRPA Goals and Policies: Chapter 2, *Land Use*.)
- 2) Creating walkable communities and increased alternative transportation options. The Regional Plan and the 2020 RTP/SCS, outlines the policies, programs and projects that provide a transportation system that supports this compact form of development and that will help to

create an environment where walking, biking, and transit are convenient modes of transportation.

The 2020 RTP/SCS would implement VMT-reducing projects and programs that are designed to reduce associated air pollutant emissions by promoting more efficient travel patterns, facilitating the use of active transportation, and enhancing and expanding transit service. The combination of compact land-uses and convenient, diverse transportation options is intended to allow more travel to be conducted on foot, by bike, or by transit, resulting in fewer and shorter vehicle trips per person and reducing negative impacts to air quality associated with motor vehicle travel. The benefits of these strategies are further articulated in the 2020 RTP/SCS.

Additionally, the RPU EIS and 2020 RTP/SCS IS/IEC demonstrated that the combination of improvements would allow the Region to achieve and maintain air quality thresholds (see Regional Plan Update Draft EIS, Chapter 3.3: *Transportation*, and Chapter 3.4: 2017 RTP/SCS IS/IEC, Chapter 3.4.5: *Transportation* and Chapter 3.4.2: *Air Quality*).

The 2020 RTP/SCS policies are focused on making connections to recreational access areas, prioritizing public and active transit, making efficient use of the existing system through technology, monitoring, and transportation demand management, increasing safety and security, and supporting economic vitality and high quality of life for residents and experience for visitors. These policies build from the 2017 RTP/SCS which focused on bikeable and walkable town centers and now focuses on connections between town centers, neighborhoods, and recreation sites.

As described above, the 2020 RTP/SCS includes new provisions that will build upon existing provisions of the Regional Plan and will support accelerated attainment and maintenance of air quality thresholds.

#### C. Soil Conservation

The Soil Conservation environmental thresholds include standards for each Land Capability District (LCD) and a standard for SEZs. The LCD standards are all in attainment (at or better than target, i.e. Bailey LCD limitations) with the exception of LCD 1b, which is considerably worse than target with a trend toward

moderate improvement, and LCD 2, which is somewhat worse than target with little to no change. The SEZ standard, “Preserve and Restore Stream Environment Zones” is described as Considerably Worse than Target with a trend toward moderate improvement. The threshold for SEZs is as follows:

Preserve existing naturally functioning SEZ lands in their natural hydrologic condition, restore all disturbed SEZ lands in undeveloped, unsubdivided lands, and restore 25 percent of the SEZ lands that have been identified as disturbed, developed or subdivided, to attain a 5 percent total increase in the area of naturally functioning SEZ lands.

The Goals and Policies in the Regional Plan that provide direction for attainment of the SEZ Threshold are contained in the SEZ, Soils, and Land Use Sub elements. (TRPA Goals and Policies: Chapter 4: *Conservation* at pages 4-14 to 4-16 and 4-24 to 4-27; TRPA Goals and Policies Chapter 2: *Land Use* at pages 2-2 to 2-19.) The SEZ Sub element currently contains one goal and eight associated policies. The goal calls for the long-term preservation, enhancement, and restoration of SEZ lands as a means of achieving various environmental thresholds. The policy statements direct the restoration, preservation, and management of SEZ lands by setting numeric goals for restoration of degraded/developed SEZ lands and requiring their protection and management for natural functions and values. The TPRA Code implements this policy and includes regulatory strategies and measures to achieve the goals listed in the SEZ Sub element of the Regional Plan.

The IS/IEC analyzed potential impacts to soils and found that the impacts would be less than significant as a result of implementation of the plan (Chapter 4.7, *Geology and Soils*). The 2020 RTP/SCS does not include provisions to alter or revise regulations pertaining to grading and soil disturbance or requirements related to coverage and protection of SEZ lands. Furthermore, implementation of transportation infrastructure projects would include drainage and soil retention infrastructure on project sites which could result in improved SEZ function.

Therefore, the Regional Plan, as amended by the 2020 RTP/SCS, will achieve and maintain the soils thresholds.

#### D. Scenic Quality

The Tahoe Basin continues to make gains in scenic quality (2015 Threshold Evaluation Report: Chapter 9: *Scenic Resources*.) All six of the scenic threshold categories are overall in attainment, with two categories showing an improving trend (2015 Threshold Evaluation Report, page ES-3). As described in the RPU EIS (at page 3.9-17), the increasing trend in scenic quality is primarily due to redevelopment activities that replace old structures with updated, more scenically compatible design and the undergrounding of utilities. Examples of documented scenic improvement from redevelopment activities include the Heavenly Village/Gondola, the Chateau, and South Lake Tahoe Safeway projects.

The IS/IEC analyzed potential impacts to scenic resources and found the impacts would be less than significant (Chapter 4.1, *Aesthetics*). The 2020 RTP/SCS maintains provisions related to design standards and scenic attainment. Furthermore, the 2015 Threshold Evaluation found that scenic resources at a regional scale were shown to improve as a result of development of recreation and bike trails. Construction and operation of new transportation projects would be required to comply with design, shielding, and lighting standards.

Therefore, the Regional Plan, as amended by the 2020 RTP/SCS, will achieve and maintain the scenic thresholds.

#### E. Vegetation

The Regional Plan and partner agencies have successfully protected sensitive plant species and kept those thresholds in attainment (2015 Threshold Evaluation Report: Chapter 6, *Vegetation Preservation*). A few uncommon plant communities fell short of attainment primarily because of non-native species. Aquatic invasive species, noxious weeds, and beaver were identified as potential threats to the integrity of uncommon plant communities. Progress is being made on fuels reduction and forest ecosystem restoration. (2015 Threshold Evaluation Report: Chapter 6, *Vegetation Preservation*; Environmental Improvement Program Accomplishments 1997-2012 available at: [http://www.trpa.org/wp-content/uploads/EIP\\_1pager\\_Summit2013\\_FINAL2.pdf](http://www.trpa.org/wp-content/uploads/EIP_1pager_Summit2013_FINAL2.pdf)).

The 2020 RTP/SCS IS/IEC analyzed potential impacts to vegetation and found that the impacts would be less than significant (Chapter 4.4, *Biological Resources*). The RTP/SCS does not include provisions to alter or revise regulations pertaining to native vegetation protection during construction, vegetation removal or groundwater management, new vegetation, unique, rare, or endangered species of plants, stream bank or backshore vegetation, or tree removal.

Therefore, the Regional Plan as amended by the 2020 RTP/SCS, will achieve and maintain the vegetation thresholds.

#### F. Recreation

Both Recreation Thresholds have been implemented and are in attainment. (2015 Threshold Evaluation Report: Chapter 11, *Recreation*.) TRPA partners have made substantial progress in upgrading recreational facilities through the EIP. (2015 Threshold Evaluation Report at pages 11-11 to 11-16.)

The 2020 RTP/SCS IS/IEC analyzed potential impacts to recreation and found the impacts would be less than significant for some impact areas, and beneficial to others (Chapter 4.16, *Recreation*). Projects in the 2020 RTP/SCS would further result in improved capacity of the recreational system through more frequent transit, traffic management and information technology, as well as pedestrian and bicycle amenities that will enable residents and visitors to more easily access and connect to recreation locations and experiences.

Therefore, the Regional Plan as amended by the 2020 RTP/SCS, will achieve and maintain the recreation thresholds.

#### G. Fisheries

TRPA and partner agencies have implemented a robust aquatic invasive species control and prevention program; however, aquatic invasive species continue to be a major area of concern because of their threat to fisheries and other aquatic biota (2015 Threshold Evaluation Report: Chapter 7, *Fisheries*).

The 2020 RTP/SCS will not alter the resource management and protection regulations, Chapters 60 through 68, or shorezone regulations, Chapters 80 through 85, of the TRPA Code of Ordinances. Chapter 63: *Fish Resources*, of the Code of

Ordinances includes the provisions to ensure the protection of fish habitat and provide for the enhancement of degraded habitat.

The 2020 RTP/SCS IS/IEC analyzed potential impacts to biological resources, including fisheries, and found impacts to be less than significant (Chapter 4.4, *Biological Resources*). Projects contained within the 2020 RTP/SCS would not affect fisheries, and for sites where infrastructure projects include stormwater retention improvements, the water quality would be improved for receiving water bodies that provide fish habitat.

Therefore, the Regional Plan as amended by the 2020 RTP/SCS, will achieve and maintain the fisheries thresholds.

#### H. Wildlife

Indicators for special interest wildlife species show stable or improving conditions (2015 Threshold Evaluation Report: Chapter 8, *Wildlife*). TRPA's development regulations have protected riparian wildlife habitats, and partner agencies are making progress restoring these valuable habitats (2015 Threshold Evaluation Report at pages 8-34 to 8-36).

The 2020 RTP/SCS will not alter the resource management and protection regulations, Chapters 60 through 68, of the TRPA Code of Ordinances. In addition, any future projects contemplated by the 2020 RTP/SCS would be subject to additional project-level environmental review and permitting. Consistent with existing conditions, permit applicants would be required to demonstrate that any proposals would occur consistent with TRPA Code provisions related to resource management, including specifically the provisions of Chapters 62 and 63 that address protection of wildlife and fish resources, respectively.

The IS/IEC analyzed potential impacts to biological resources, including wildlife, and found the impacts would be less than significant. The RTP/SCS does not include provisions to alter or revise regulations related to wildlife habitat, monitoring and disturbance during construction.

Therefore, the Regional Plan as amended by the 2020 RTP/SCS, will achieve and maintain the wildlife thresholds.

#### I. Noise

TRPA has adopted noise standards for the Tahoe Basin. The noise thresholds are Community Noise Equivalent Level (CNEL) values for the various land use categories and single event (Lmax) standards for specific noise sources. CNEL is the metric used by TRPA for determining land use compatibility. No one activity, nor combination of activities, can exceed the applicable CNEL level. CNELs are calculated pursuant to Chapter 68 of the TRPA Code of Ordinances.

The IS/IEC analyzed potential impacts related to noise and found the impacts to be less than significant, although the noise models in the IS/IEC estimated minor increases in traffic noise levels. Because implementation of the 2020 RTP/SCS would not result in substantially louder traffic noise levels in 2045 than the baseline levels and 2040 levels presented in the 2017 RTP/SCS EIR/EIS, this would not be a significantly more severe impact.

Therefore, the Regional Plan, as amended by the 2020 RTP/SCS will achieve and maintain the noise thresholds.

#### III. Conclusion

Based on the rationale described above, the 2020 RTP/SCS IS/IEC, the attached Compliance Measures and Threshold Status spreadsheets, the previously certified RPU EIS and RTP EIR/EIS's, and the findings made on December 12, 2012 for the RPU and RTP; TRPA finds the Regional Plan and all its elements, as amended by the 2020 RTP/SCS, will achieve and maintain the thresholds. The 2020/SCS RTP would maintain existing Regional Plan policies and programs and would result in no significant impacts to thresholds. The 2020 RTP/SCS also includes specific policies and implementation measures that would accelerate attainment and maintenance of thresholds. Thus, the Regional Plan, as amended by the 2020 RTP/SCS, will continue to achieve and maintain the thresholds.





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**STATEMENT OF NO SIGNIFICANT EFFECT**

Project Description: 2020 Regional Transportation Plan / Sustainable Communities Strategy

Staff Analysis: In accordance with Article IV of the Tahoe Regional Planning Compact, as amended, and Section 6.6 of the TRPA Rules of Procedure, TRPA staff reviewed the information submitted with the subject project.

Determination: Based on the Initial Environmental Checklist, Agency staff found that the subject project will not have a significant effect on the environment.

\_\_\_\_\_  
TRPA Executive Director/Designee

\_\_\_\_\_  
Date

Attachment E

Threshold Indicators and Compliance Measures Checklist  
(Governing Board Agenda Item VII.A VMT- Attachment B)

**2020 REGIONAL TRANSPORTATION PLAN/SUSTAINABLE**

|  |          |                 |  |
|--|----------|-----------------|--|
| <b>Impact of Project on Air Quality Indicators/Targets/Other Factors (Y/N)</b>       | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to Air Quality and found impacts to be less than significant. The analysis found that the plan is in conformance with federal and state air quality regulations. Furthermore, the 2020 RTP/SCS implements projects and programs that are designed to reduce air pollutant emissions. Greenhouse gas emissions were also analyzed and impacts were found to be less than significant. The combination of improved vehicle fuel efficiency, which would reduce per vehicle GHG emissions and the travel efficiency offered by the transportation projects included in the RTP would result in an overall reduction in GHG emissions. AQ 14, below, has been removed and will be replaced with Transportation and Sustainable Communities indicator TSCI. If adopted, this change would be reflected in the 2023 Threshold Evaluation. |
| <b>Impact of Project on Water Quality Indicators/Targets/Other Factors (Y/N)</b>     | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to Water Quality and found that majority of impacts would be less than significant as a result of implementation of the Plan. Beneficial water quality impacts would also result due to the upgraded stormwater infrastructure and other site specific improvements.  |
| <b>Impact of Project on Soil Conservation Indicators/Targets/Other Factors (Y/N)</b> | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to soils and found that the impacts would be less than significant as a result of implementation of the plan. The RTP does not include provisions to alter or revise regulations pertaining to grading and soil disturbance. Furthermore, implementation of transportation infrastructure projects would improve conditions related to soil retention on project site.  |
| <b>Impact of Project on Vegetation Indicators/Targets/Other Factors (Y/N)</b>        | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to vegetation and found that the impacts would be less than significant. The RTP/SCS does not include provisions to alter or revise regulations pertaining to native vegetation protection during construction, vegetation removal or groundwater management, new vegetation, unique, rare, or endangered species of plants, stream bank or backshore vegetation, or tree removal.  |
| <b>Impact of Project on Fisheries Indicators/Targets/Other Factors (Y/N)</b>         | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to biological resources, including fisheries, and found impacts to be less than significant. Projects contained within the 2020 RTP/SCS would not affect fisheries, and for sites where infrastructure projects include stormwater retention improvements, the water quality would be improved for receiving water bodies that provide fish habitat.  |
| <b>Impact of Project on Wildlife Indicators/Targets/Other Factors (Y/N)</b>          | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to biological resources, including wildlife, and found the impacts would be less than significant. The RTP/SCS does not include provisions to alter or revise regulations related to wildlife habitat, monitoring and disturbance during construction.  |
| <b>Impact of Project on Recreation Indicators/Targets/Other Factors (Y/N)</b>        | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to recreation and found the impacts would be less than significant. Projects in the 2020 RTP/SCS would further result in improved capacity of the recreational system through more frequent transit, traffic management and information technology, as well as pedestrian and bicycle amenities that will enable residents and visitors to more easily access and connect to recreation locations and experiences.  |
| <b>Impact of Project on Scenic Resources Indicators/Targets/Other Factors (Y/N)</b>  | <b>N</b> | <b>Comments</b> | The 2020 RTP/SCS IS/IEC analyzed potential impacts to scenic resources and found the impacts would be less than significant. The RTP/SCS does not include provisions to alter or revise regulations related to design standards and scenic attainment. Furthermore, the 2015 Threshold Evaluation found that scenic resources at a regional scale were shown to improve as a result of development of recreation and bike trails. Construction and operation of new transportation projects would be required to comply with design, shielding, and lighting standards.  |

|   |   |          |  |
|---|---|----------|--|
| Impact of Project on Noise Indicators/Targets/Other Factors (Y/N) | N | Comments | The 2020 RTP/SCS IS/IEC analyzed potential impacts related to noise and found the impacts to be less than significant, although the IS/IEC estimated minor increases in traffic noise levels. Because implementation of the 2020 RTP/SCS would not result in substantially louder traffic noise levels in 2045 than the baseline levels and 2035 levels presented in the 2012 RTP/SCS EIR/EIS, this would not be a significantly more severe impact. |
|---|---|----------|--|

**UPDATE TO AIR QUALITY THRESHOLD STANDARD (AQ14) AND ASSOCIATED**

|   |   |          |   |
|---|---|----------|---|
| Impact of Project on Air Quality Indicators/Targets/Other Factors (Y/N)       | N | Comments | The Threshold Standard (AQ14) Update IEC analyzed potential impacts to Air Quality and found impacts to be less than significant. The analysis found that the proposed changes are consistent with best practice and in conformance with federal and state air quality regulations. Furthermore, the 2020 RTP/SCS implements projects and programs that are designed to reduce air pollutant emissions. Greenhouse gas emissions were also analyzed and impacts were found to be less than significant. The combination of improved vehicle fuel efficiency, which would reduce per vehicle GHG emissions and the travel efficiency offered by the transportation projects included in the RTP would result in an overall reduction in GHG emissions. AQ 14, below, has been removed and will be replaced with Transportation and Sustainable Communities indicator TSCI, which will be reflected in the 2021 Threshold Evaluation. |
| Impact of Project on Water Quality Indicators/Targets/Other Factors (Y/N)     | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to Water Quality and found that the impacts would be less than significant, and would not impact the Regions ability to achieve the Lake Tahoe Total Mximum Daily Load targets.  |
| Impact of Project on Soil Conservation Indicators/Targets/Other Factors (Y/N) | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to soils and found that the impacts would be less than significant as a result of implementation of the plan. Niether the updated standard nor implementation framework would alter or revise regulations pertaining to grading and soil disturbance.  |
| Impact of Project on Vegetation Indicators/Targets/Other Factors (Y/N)        | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to vegetation and found that the impacts would be less than significant. Niether the updated standard nor implementation framework include provisions to alter or revise regulations pertaining to native vegetation protection during construction, vegetation removal or groundwater management, new vegetation, unique, rare, or endangered species of plants, stream bank or backshore vegetation, or tree removal.  |
| Impact of Project on Fisheries Indicators/Targets/Other Factors (Y/N)         | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to biological resources, including fisheries, and found impacts to be less than significant. Niether the updated standard nor implementation framework would affect fisheries or biological resources.   |
| Impact of Project on Wildlife Indicators/Targets/Other Factors (Y/N)          | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to biological resources, including wildlife, and found the impacts would be less than significant. Niether the updated standard nor implementation framework include provisions that alter or revise regulations related to wildlife habitat, monitoring and disturbance during construction.  |
| Impact of Project on Recreation Indicators/Targets/Other Factors (Y/N)        | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to recreation and found the impacts would be less than significant. The updated standard and implementation framework emphasize greater locational efficiency in the placement of new development, that coupled with the projects in the 2020 RTP/SCS would further result in improved modal access to the region's recreational amenities.  |
| Impact of Project on Scenic Resources Indicators/Targets/Other Factors (Y/N)  | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts to scenic resources and found the impacts would be less than significant. Niether the updated standard nor implementation framework include provisions that alter or revise regulations related to design standards and scenic attainment.   |
| Impact of Project on Noise Indicators/Targets/Other Factors (Y/N)             | N | Comments | The Threshold Standard (AQ14) Update IS/IEC analyzed potential impacts related to noise and found the impacts to be less than significant, although the IS/IEC estimated minor increases in traffic noise levels. Niether the updated standard nor implementation framework include provisions that alter or revise regulations related to noise.   |

**THRESHOLD ATTAINMENT STATUS**

| Category             | Reporting Category | Standard Type | Name of Standard | Adopted Standard | 2015 Status | Status (2015) | Trend (2015) | Confidence (2015) |
|----------------------|--------------------|---------------|------------------|------------------|-------------|---------------|--------------|-------------------|
| <b>WATER QUALITY</b> |                    |               |                  |                  |             |               |              |                   |

|               |                                 |      |                     |   |   |                         |                                   |                                      |          |
|---------------|---------------------------------|------|---------------------|---|---|-------------------------|-----------------------------------|--------------------------------------|----------|
| WATER QUALITY | DEEP WATER (PELAGIC) LAKE TAHOE | WQ1  | NUMERICAL STANDARD  | Annual Average Secchi Disk                  | The annual average deep water transparency as measured by Secchi disk shall not be decreased below 29.7 meters (97.4 feet), the average levels recorded between 1967 and 1971 by the University of California, Davis. | Non-Attainment          | Somewhat Worse Than Target        | Little or No Change                  | Moderate |
| WATER QUALITY | DEEP WATER (PELAGIC) LAKE TAHOE | WQ2  | NUMERICAL STANDARD  | Primary Productivity                        | Maintain annual mean phytoplankton primary productivity at or below 52gmC/m2/yr   | Non-Attainment          | Considerably Worse Than Target    | Rapid Decline                        | High     |
| WATER QUALITY | LITTORAL LAKE TAHOE             | WQ3  | NUMERICAL STANDARD  | Littoral Turbidity                          | Attain turbidity values not to exceed three NTU.  | Attainment              | At or Somewhat Better Than Target | Insufficient Data to Determine Trend | Moderate |
| WATER QUALITY | LITTORAL LAKE TAHOE             | WQ4  | NUMERICAL STANDARD  | Littoral Turbidity - non-stream zone        | Turbidity shall not exceed one NTU in shallow waters of the Lake not directly influenced by stream discharges.  | Attainment              | At or Somewhat Better Than Target | Insufficient Data to Determine Trend | Moderate |
| WATER QUALITY | LITTORAL LAKE TAHOE             | WQ5  | NUMERICAL STANDARD  | Littoral phytoplankton primary productivity | Attain 1967-71 mean values for phytoplankton primary productivity in the littoral zone.   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | LITTORAL LAKE TAHOE             | WQ6  | NUMERICAL STANDARD  | Littoral periphyton                         | Attain 1967-71 mean values for periphyton biomass in the littoral zone.   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | LITTORAL LAKE TAHOE             | WQ7  | MANAGEMENT STANDARD | Attached Algae                              | Support actions to reduce the extent and distribution of excessive periphyton (attached) algae in the nearshore (littoral zone) of Lake Tahoe   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ8  | MANAGEMENT STANDARD | AIS Prevention                              | Prevent the introduction of new aquatic invasive species into the region's waters.  | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ9  | MANAGEMENT STANDARD | AIS Abundance                               | Reduce the abundance of known aquatic invasive species.   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ10 | MANAGEMENT STANDARD | AIS Distribution                            | Reduce the distribution of known aquatic invasive species.  | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ11 | MANAGEMENT STANDARD | AIS ecological impacts                      | Abate harmful ecological impacts resulting from aquatic invasive species.   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ12 | MANAGEMENT STANDARD | AIS economic impacts                        | Abate harmful economic impacts resulting from aquatic invasive species.   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ13 | MANAGEMENT STANDARD | AIS social impacts                          | Abate harmful social impacts resulting from aquatic invasive species.   | No Status Determination | No status determination           | N/A                                  | N/A      |
| WATER QUALITY | AQUATIC INVASIVE SPECIES        | WQ14 | MANAGEMENT STANDARD | AIS public health impacts                   | Abate harmful public health impacts resulting from aquatic invasive species   | No Status Determination | No status determination           | N/A                                  | N/A      |

|               |                |      |                     |  |  |                                  |                            |                     |          |
|---------------|----------------|------|---------------------|--|--|----------------------------------|----------------------------|---------------------|----------|
| WATER QUALITY | TRIBUTARIES    | WQ15 | NUMERICAL STANDARD  | Nitrogen Concentration - streams                         | Attain applicable state standards for concentrations of dissolved inorganic nitrogen   | 3 of 7 tributaries in attainment | Somewhat Worse Than Target | Little or No Change | Moderate |
| WATER QUALITY | TRIBUTARIES    | WQ16 | NUMERICAL STANDARD  | Phosphorus concentration - streams                       | Attain applicable state standards for concentrations of dissolved phosphorus.  | 3 of 7 tributaries in attainment | Somewhat Worse Than Target | Little or No Change | Moderate |
| WATER QUALITY | TRIBUTARIES    | WQ17 | NUMERICAL STANDARD  | Iron concentration streams                               | Attain applicable state standards for dissolved iron.  | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | TRIBUTARIES    | WQ18 | NUMERICAL STANDARD  | Suspended Sediment concentration streams                 | Attain a 90 percentile value for suspended sediment concentration of 60 mg/1.  | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | SURFACE RUNOFF | WQ19 | NUMERICAL STANDARD  | Dissolved inorganic nitrogen concentrations - stormwater | Achieve a 90 percentile concentration value for dissolved inorganic nitrogen of 0.5 mg/1 in surface runoff directly discharged to a surface water body in the Basin. | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | SURFACE RUNOFF | WQ20 | NUMERICAL STANDARD  | concentration - stormwater                               | concentration value for dissolved phosphorus of 0.1 mg/1 in surface  | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | SURFACE RUNOFF | WQ21 | NUMERICAL STANDARD  | Iron concentration - stormwater                          | Achieve a 90 percentile concentration value for dissolved iron of 0.5 mg/1 in surface runoff directly discharged to a surface water body in the Basin.               | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | SURFACE RUNOFF | WQ22 | NUMERICAL STANDARD  | Suspended Sediment concentration - stormwater            | Achieve a 90 percentile concentration value for suspended sediment of 250 mg/1 in surface runoff directly discharged to a surface water body in the Basin.           | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | GROUNDWATER    | WQ23 | MANAGEMENT STANDARD | Surface Discharge - nitrogen                             | Surface Discharge: Total Nitrogen Maximum concentration 0.5 mg/l.  | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | GROUNDWATER    | WQ24 | MANAGEMENT STANDARD | Surface Discharge - phosphorus                           | Surface Discharge: Total phosphate Maximum concentration 0.1 mg/l.   | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | GROUNDWATER    | WQ25 | MANAGEMENT STANDARD | Surface Discharge - iron                                 | Surface Discharge: Total iron Maximum concentration 0.5 mg/l.  | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | GROUNDWATER    | WQ26 | MANAGEMENT STANDARD | Surface Discharge - turbidity                            | Surface Discharge: Turbidity Maximum concentration 20 JTU.   | No Status Determination          | No status determination    | N/A                 | N/A      |
| WATER QUALITY | GROUNDWATER    | WQ27 | MANAGEMENT STANDARD | Surface Discharge - grease and oil                       | Surface Discharge: Grease and Oil Maximum concentration 2.0 mg/l.  | No Status Determination          | No status determination    | N/A                 | N/A      |

|               |                 |      |                     |  |   |                         |                         |     |     |
|---------------|-----------------|------|---------------------|--|---|-------------------------|-------------------------|-----|-----|
| WATER QUALITY | GROUNDWATER     | WQ28 | MANAGEMENT STANDARD | Discharge to groundwater - nitrogen      | Runoff Discharged to Groundwater: Total Nitrogen Maximum concentration 0.5 mg/l.  | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | GROUNDWATER     | WQ29 | MANAGEMENT STANDARD | Discharge to groundwater - phosphorus    | Runoff Discharged to Groundwater: Total Phosphate Maximum concentration 1 mg/l.   | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | GROUNDWATER     | WQ30 | MANAGEMENT STANDARD | Discharge to groundwater - iron          | Runoff Discharged to Groundwater: Total iron Maximum concentration 4.0 mg/  | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | GROUNDWATER     | WQ31 | MANAGEMENT STANDARD | Discharge to groundwater - turbidity     | Runoff Discharged to Groundwater: Turbidity Maximum concentration 200 JTU.  | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | GROUNDWATER     | WQ32 | MANAGEMENT STANDARD | Discharge to groundwater- grease and oil | Runoff Discharged to Groundwater: Grease and Oil Maximum concentration 40.0 mg/l.   | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | OTHER LAKES     | WQ33 | NUMERICAL STANDARD  | Attain existing water quality standards. | Attain existing water quality standards.  | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | LOAD REDUCTIONS | WQ34 | MANAGEMENT STANDARD | Load - Fine Sediment Particles           | Reduce fine sediment particle (inorganic particle size < 16 micrometers in diameter) load to achieve long-term pelagic water quality standards (WQ1 and WQ2). | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | LOAD REDUCTIONS | WQ35 | MANAGEMENT STANDARD | Load - total annual phosphorus           | Reduce total annual phosphorus load to achieve long-term pelagic water quality standards (WQ1 and WQ2) and littoral quality standards (WQ5 and WQ6).          | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | LOAD REDUCTIONS | WQ36 | MANAGEMENT STANDARD | Load - total annual nitrogen             | Reduce total annual nitrogen load to achieve long-term pelagic water quality standards (WQ1 and WQ2) and littoral quality standards (WQ5 and WQ6).            | No Status Determination | No status determination | N/A | N/A |
| WATER QUALITY | LOAD REDUCTIONS | WQ37 | MANAGEMENT STANDARD | Load - total annual suspended sediment   | Decrease total annual suspended sediment load to achieve littoral turbidity standards (WQ3 and WQ4).  | No Status Determination | No status determination | N/A | N/A |

|                          |                  |      |                     |                               |   |                         |                                   |                      |          |
|--------------------------|------------------|------|---------------------|-------------------------------|---|-------------------------|-----------------------------------|----------------------|----------|
| WATER QUALITY            | LOAD REDUCTIONS  | WQ38 | MANAGEMENT STANDARD | Load - dissolved phosphorus   | Reduce the loading of dissolved phosphorus to achieve pelagic water standards (WQ1 and WQ2) and littoral quality standards (WQ5 and WQ6).   | No Status Determination | No status determination           | N/A                  | N/A      |
| WATER QUALITY            | LOAD REDUCTIONS  | WQ39 | MANAGEMENT STANDARD | Load - iron                   | Reduce the loading of iron to achieve pelagic water standards (WQ1 and WQ2) and littoral quality standards (WQ5 and WQ6).   | No Status Determination | No status determination           | N/A                  | N/A      |
| WATER QUALITY            | LOAD REDUCTIONS  | WQ40 | MANAGEMENT STANDARD | Load - other algal nutrients  | Reduce the loading of other algal nutrients to achieve pelagic water standards (WQ1 and WQ2) and littoral quality standards (WQ5 and WQ6).  | No Status Determination | No status determination           | N/A                  | N/A      |
| WATER QUALITY            | LOAD REDUCTIONS  | WQ41 | MANAGEMENT STANDARD | Load - dissolved nitrogen     | The most stringent of the three dissolved inorganic nitrogen load reduction targets shall apply: i. Reduce dissolved inorganic nitrogen loads to pelagic and littoral Lake Tahoe from: a) surface runoff by approximately 50 percent of the 1973-81 annual average, b) groundwater approximately 30 percent of the 1973-81 annual average, and c) atmospheric sources approximately 20 percent of the 1973-81 annual average. ii. Reduce dissolved inorganic nitrogen loading to Lake Tahoe from all sources by 25 percent of the 1973-81 annual average. iii. To achieve littoral water quality standards (WQ5 and WQ6). | No Status Determination | No status determination           | N/A                  | N/A      |
| <b>SOIL CONSERVATION</b> |                  |      |                     |                               |   |                         |                                   |                      |          |
| SOIL CONSERVATION        | IMPERVIOUS COVER | SC1  | MANAGEMENT STANDARD | Bailey Land Coverage Class 1a | Allowable percent of impervious cover in Land Capability subclass 1a - 1%.  | Attainment              | Considerably Better Than Target   | Little or No Change  | Moderate |
| SOIL CONSERVATION        | IMPERVIOUS COVER | SC2  | MANAGEMENT STANDARD | Bailey Land Coverage Class 1b | Allowable percent of impervious cover in Land Capability subclass 1b - 1%.  | Non-Attainment          | Considerably Worse Than Target    | Moderate Improvement | Moderate |
| SOIL CONSERVATION        | IMPERVIOUS COVER | SC3  | MANAGEMENT STANDARD | Bailey Land Coverage Class 1c | Allowable percent of impervious cover in Land Capability subclass 1c - 1%.  | Attainment              | At or Somewhat Better Than Target | Little or No Change  | Moderate |



|                    |                          |      |                     |                              |   |                |                                   |                                      |          |
|--------------------|--------------------------|------|---------------------|------------------------------|---|----------------|-----------------------------------|--------------------------------------|----------|
| SOIL CONSERVATION  | IMPERVIOUS COVER         | SC4  | MANAGEMENT STANDARD | Bailey Land Coverage Class 2 | Allowable percent of impervious cover in Land Capability class 2 - 1%.  | Non-Attainment | Somewhat Worse Than Target        | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | IMPERVIOUS COVER         | SC5  | MANAGEMENT STANDARD | Bailey Land Coverage Class 3 | Allowable percent of impervious cover in Land Capability class 3 - 5%.  | Attainment     | Considerably Better Than Target   | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | IMPERVIOUS COVER         | SC6  | MANAGEMENT STANDARD | Bailey Land Coverage Class 4 | Allowable percent of impervious cover in Land Capability class 4 - 20%.   | Attainment     | Considerably Better Than Target   | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | IMPERVIOUS COVER         | SC7  | MANAGEMENT STANDARD | Bailey Land Coverage Class 5 | Allowable percent of impervious cover in Land Capability class 5 - 25%.   | Attainment     | Considerably Better Than Target   | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | IMPERVIOUS COVER         | SC8  | MANAGEMENT STANDARD | Bailey Land Coverage Class 6 | Allowable percent of impervious cover in Land Capability class 6 - 30%.   | Attainment     | Considerably Better Than Target   | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | IMPERVIOUS COVER         | SC9  | MANAGEMENT STANDARD | Bailey Land Coverage Class 7 | Allowable percent of impervious cover in Land Capability class 7 - 30%.   | Attainment     | Considerably Better Than Target   | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | STREAM ENVIRONMENT ZONES | SC10 | NUMERICAL STANDARD  | Preserve SEZ function        | Preserve existing naturally functioning SEZ lands in their natural hydrologic condition.  | Non-Attainment | Implemented                       | Little or No Change                  | Moderate |
| SOIL CONSERVATION  | STREAM ENVIRONMENT ZONES | SC11 | NUMERICAL STANDARD  | Restore undeveloped SEZ      | Restore all disturbed SEZ lands in undeveloped, unsubdivided lands.   | Non-Attainment | No status determination           | Insufficient Data to Determine Trend | N/A      |
| SOIL CONSERVATION  | STREAM ENVIRONMENT ZONES | SC12 | NUMERICAL STANDARD  | Restore 25% disturbed SEZ    | Restore 25 percent of the SEZ lands that have been identified as disturbed, developed or subdivided.  | Non-Attainment | Considerably Worse Than Target    | Moderate Improvement                 | Moderate |
| SOIL CONSERVATION  | STREAM ENVIRONMENT ZONES | SC13 | NUMERICAL STANDARD  | 5% increase SEZ function     | Attain a 5 percent total increase in the area of naturally functioning SEZ lands.   | Non-Attainment | At or Somewhat Better Than Target | Moderate Improvement                 | Moderate |
| <b>AIR QUALITY</b> |                          |      |                     |                              |   |                |                                   |                                      |          |
| AIR QUALITY        | CARBON MONOXIDE          | AQ1  | NUMERICAL STANDARD  | 8-hour Carbon Monoxide       | Maintain carbon monoxide concentrations at or below 6 parts per million (7 mg/m3) averaged over 8 hours.  | Attainment     | Considerably Better Than Target   | Moderate Improvement                 | Moderate |
| AIR QUALITY        | CARBON MONOXIDE          | AQ2  | MANAGEMENT STANDARD | Winter Traffic Volume        | Reduce traffic volumes on the U.S. 50 Corridor by 7 percent during the winter from the 1981 base year between 4:00 p.m. and 12:00 midnight, provided that those traffic volumes shall be amended as necessary to meet the respective state standards. | Attainment     | Considerably Better Than Target   | Moderate Improvement                 | Moderate |
| AIR QUALITY        | OZONE                    | AQ3  | NUMERICAL STANDARD  | 1-hour Ozone                 | Maintain ozone concentrations at or below 0.08 parts per million averaged over 1 hour.  | Attainment     | At or Somewhat Better Than Target | Moderate Improvement                 | High     |

|             |                         |     |                    |                      |   |                         |
|-------------|-------------------------|-----|--------------------|----------------------|---|-------------------------|
| AIR QUALITY | OZONE                   | AQ4 | NUMERICAL STANDARD | Oxides of Nitrogen   | Maintain oxides of nitrogen (NOx) emissions at or below the 1981 level.   | Attainment              |
| AIR QUALITY | REGIONAL VISIBILITY4    | AQ5 | NUMERICAL STANDARD | Bliss State Park 50% | Achieve an extinction coefficient of 25 Mm-1 at least 50 percent of the time as calculated from aerosol species concentrations measured at the Bliss State Park monitoring site (visual range of 156 kilometer, 97 miles).  | Attainment              |
| AIR QUALITY | REGIONAL VISIBILITY4    | AQ6 | NUMERICAL STANDARD | Bliss State Park 90% | Achieve an extinction coefficient of 34 Mm-1 at least 90 percent of the time as calculated from aerosol species concentrations measured at the Bliss State Park monitoring site (visual range of 115 kilometers, 71 miles). | Attainment              |
| AIR QUALITY | SUBREGIONAL VISIBILITY5 | AQ7 | NUMERICAL STANDARD | South Lake 50%       | Achieve an extinction coefficient of 50 Mm-1 at least 50 percent of the time as calculated from aerosol species concentrations measured at the South Lake Tahoe monitoring site (visual range of 78 kilometers, 48 miles).  | No Status Determination |
| AIR QUALITY | SUBREGIONAL VISIBILITY5 | AQ8 | NUMERICAL STANDARD | South Lake 90%       | Achieve an extinction coefficient of 125 Mm-1 at least 90 percent of the time as calculated from aerosol species concentrations measured at the South Lake Tahoe monitoring site (visual range of 31 kilometers, 19 miles). | No Status Determination |

|                                   |                      |          |
|-----------------------------------|----------------------|----------|
| Considerably Better Than Target   | Moderate Improvement | Moderate |
| At or Somewhat Better Than Target | Little or No Change  | Moderate |
| At or Somewhat Better Than Target | Little or No Change  | Moderate |
| No status determination           | N/A                  | N/A      |
| No status determination           | N/A                  | N/A      |

AIR QUALITY      RESPIRABLE AND FINE PARTICULATE MATTER      AQ9      NUMERICAL STANDARD      PM10 24-hour      Particulate Matter<sub>10</sub> 24-hour Standard: Maintain Particulate Matter<sub>10</sub> at or below 50µg/m<sup>3</sup> measured over a 24-hour period in the portion of the Region within California, and maintain Particulate Matter<sub>10</sub> at or below 150 µg/m<sup>3</sup> measured over a 24-hour period in the portion of the Region within Nevada. Particulate Matter<sub>10</sub> measurements shall be made using gravimetric or beta attenuation methods or any equivalent procedure which can be shown to provide equivalent results at or near the level of air quality standard.      Non-Attainment

AIR QUALITY      RESPIRABLE AND FINE PARTICULATE MATTER      AQ10      NUMERICAL STANDARD      PM10 Annual Average      Particulate Matter<sub>10</sub> Annual Arithmetic Average - Maintain Particulate Matter<sub>10</sub> at or below annual arithmetic average of 20µg/m<sup>3</sup> in the portion of the Region within California, and maintain Particulate Matter<sub>10</sub> at or below annual arithmetic average in the portion of the Region within Nevada. Particulate Matter<sub>10</sub> measurements shall be made using gravimetric or beta attenuation methods or any equivalent procedure which can be shown to provide equivalent results at or near the level of air quality standard.      Attainment

AIR QUALITY      RESPIRABLE AND FINE PARTICULATE MATTER      AQ11      NUMERICAL STANDARD      PM2.5 24-hour      Particulate Matter<sub>2.5</sub> 24-hour Standard - Maintain Particulate Matter<sub>2.5</sub> at or below 35µg/m<sup>3</sup> measured over a 24-hour period using gravimetric or beta attenuation methods or any equivalent procedure which can be shown to provide equivalent results at or near the level of air quality standard.      Attainment

|                                   |                      |          |
|-----------------------------------|----------------------|----------|
| Somewhat Worse Than Target        | Little or No Change  | Moderate |
| Considerably Better Than Target   | Moderate Improvement | Moderate |
| At or Somewhat Better Than Target | Little or No Change  | Moderate |

|                                |  |      |                     |   |  |            |                                   |                      |           |
|--------------------------------|--|------|---------------------|---|--|------------|-----------------------------------|----------------------|-----------|
| AIR QUALITY                    | RESPIRABLE AND FINE PARTICULATE MATTER | AQ12 | NUMERICAL STANDARD  | PM2.5 Annual Average                                  | Particulate Matter <sup>2.5</sup> Annual Arithmetic Average - Maintain Particulate Matter <sup>2.5</sup> at or below annual arithmetic average of 12µg/m <sup>3</sup> in the portion of the Region within California and maintain Particulate Matter <sup>2.5</sup> at or below annual arithmetic average of 15µg/m <sup>3</sup> in the portion of the Region within Nevada. Particulate Matter <sup>2.5</sup> measurements shall be made using gravimetric or beta attenuation methods or any equivalent procedure which can be shown to provide equivalent results at or near the level of air quality standard. | Attainment | Considerably Better Than Target   | Little or No Change  | Moderate  |
| AIR QUALITY                    | NITRATE DEPOSITION                     | AQ13 | MANAGEMENT STANDARD | Nitrate Deposition                                    | Reduce the transport of nitrates into the Basin and reduce oxides of nitrogen (NO <sub>x</sub> ) produced in the Basin consistent with the water quality thresholds.   | Attainment | Implemented                       | N/A                  | N/A       |
| AIR QUALITY                    | NITRATE DEPOSITION                     | AQ14 | MANAGEMENT STANDARD | Vehicle Miles Traveled                                | Reduce vehicle miles of travel in the Basin by 10 percent of the 1981 base year values.  | Attainment | At or Somewhat Better Than Target | Moderate-Improvement | Moderate- |
| <b>VEGETATION PRESERVATION</b> |  |      |                     |   |  |            |                                   |                      |           |
| VEGETATION PRESERVATION        | COMMON VEGETATION                      | VP1  | MANAGEMENT STANDARD | SEZ non-degradation                                   | A non-degradation standard shall apply to native deciduous trees, wetlands, and meadows to preserve plant communities and significant wildlife habitat, while providing for opportunities to increase the acreage of such riparian associations to be consistent with the SEZ threshold.   | Attainment | Implemented                       | N/A                  | N/A       |
| VEGETATION PRESERVATION        | COMMON VEGETATION                      | VP2  | MANAGEMENT STANDARD | Vegetation Community Richness, Abundance, and Pattern | Increase plant and structural diversity of forest communities through appropriate management practices as measured by diversity indices of species richness, relative abundance, and pattern.  | Attainment | At or Somewhat Better Than Target | Little or No Change  | Moderate  |

|                         |                   |     |                     |  |                         |
|-------------------------|-------------------|-----|---------------------|--|-------------------------|
| VEGETATION PRESERVATION | COMMON VEGETATION | VP3 | MANAGEMENT STANDARD | Vegetation Community Richness<br>maintain the existing species richness of the Basin by providing for the perpetuation of the following plant associations:<br>Yellow Pine Forest: Jeffrey pine, White fir, Incense cedar, Sugar pine. Red Fir Forest: Red fir, Jeffrey pine, Lodgepole pine, Western white pine, Mountain hemlock, Western juniper. Subalpine Forest: Whitebark pine, Mountain hemlock, Mountain mahogany. Shrub Association: Greenleaf and Pinemat manzanita, Tobacco brush, Sierra chinquapin, Huckleberry oak, Mountain whitethorn. Sagebrush Scrub Vegetation: Basin sagebrush, Bitterbrush, Douglas chaenactis. Deciduous Riparian: Quaking aspen, Mountain alder, Black cotton-wood, Willow. Meadow Associations (Wet and Dry Meadow): Mountain squirrel tail, Alpine gentian, Whorled penstemon, Asters, Fescues, Mountain brome, Corn lilies, Mountain bentgrass, Hairgrass, Marsh marigold, Elephant heads, Tinker's penney, Mountain Timothy, Sedges, Rushes, Buttercups. Wetland Associations (Marsh Vegetation): Pond lilies, | No Status Determination |
| VEGETATION PRESERVATION | COMMON VEGETATION | VP4 | MANAGEMENT STANDARD | Abundance of Meadow and Wetlands<br>Relative Abundance - Of the total amount of undisturbed vegetation in the Tahoe Basin: Maintain at least four percent meadow and wetland vegetation.   | Non-Attainment          |
| VEGETATION PRESERVATION | COMMON VEGETATION | VP5 | MANAGEMENT STANDARD | Abundance of Riparian Deciduous<br>Relative Abundance - Of the total amount of undisturbed vegetation in the Tahoe Basin: Maintain at least four percent deciduous riparian vegetation   | Non-Attainment          |
| VEGETATION PRESERVATION | COMMON VEGETATION | VP6 | MANAGEMENT STANDARD | Abundance of Shrubs<br>Relative Abundance - Of the total amount of undisturbed vegetation in the Tahoe Basin: Maintain no more than 25 percent dominant shrub association vegetation   | Attainment              |

|                                 |                                      |          |
|---------------------------------|--------------------------------------|----------|
| No status determination         | N/A                                  | N/A      |
| Somewhat Worse Than Target      | Little or No Change                  | Moderate |
| Considerably Worse Than Target  | Little or No Change                  | Low      |
| Considerably Better Than Target | Insufficient Data to Determine Trend | Low      |

VEGETATION PRESERVATION COMMON VEGETATION VP7 MANAGEMENT STANDARD Abundance of Yellow Pine Forest in Seral Stages  
 Relative Abundance - Of the total amount of undisturbed vegetation in the Tahoe Basin: Maintain 15-25 percent of the Yellow Pine Forest in seral stages other than mature. Non-Attainment

VEGETATION PRESERVATION COMMON VEGETATION VP8 MANAGEMENT STANDARD Abundance of Red Fir Forest in Seral Stages  
 Relative Abundance - Of the total amount of undisturbed vegetation in the Tahoe Basin: Maintain 15-25 percent of the Red Fir Forest in seral stages other than mature. Non-Attainment

VEGETATION PRESERVATION COMMON VEGETATION VP9 MANAGEMENT STANDARD Size of New Forest Openings  
 Pattern - Provide for the proper juxtaposition of vegetation communities and age classes by; 1. Limiting acreage size of new forest openings to no more than eight acres. Attainment

VEGETATION PRESERVATION COMMON VEGETATION VP10 MANAGEMENT STANDARD Stand composition and age  
 Pattern - Provide for the proper juxtaposition of vegetation communities and age classes by; 2. Adjacent openings shall not be of the same relative age class or successional stage to avoid uniformity in stand composition and age. Attainment

VEGETATION PRESERVATION COMMON VEGETATION VP11 MANAGEMENT STANDARD Bailey Capability  
 Native vegetation shall be maintained at a maximum level to be consistent with the limits defined in the Land-Capability Classification of the Lake Tahoe Basin, California-Nevada, A Guide For Planning, Bailey, 19746, for allowable impervious cover and permanent site disturbance. Attainment

VEGETATION PRESERVATION LATE SERAL AND OLD GROWTH FOREST ECOSYSTEMS7 VP12 NUMERICAL STANDARD Total Old growth  
 Attain and maintain a minimum percentage of 55 percent by area of forested lands within the Tahoe Region in a late seral or old growth condition, and distributed across elevation zones. Standards VP 13, VP14, and VP15 must be attained to achieve this threshold. Non-Attainment

|                                |                                      |          |
|--------------------------------|--------------------------------------|----------|
| Considerably Worse Than Target | Little or No Change                  | Moderate |
| Considerably Worse Than Target | Little or No Change                  | Moderate |
| Implemented                    | N/A                                  | N/A      |
| Implemented                    | N/A                                  | N/A      |
| Implemented                    | N/A                                  | N/A      |
| Considerably Worse Than Target | Insufficient Data to Determine Trend | Low      |

|                         |   |      |                    |  |  |                |                                 |                                      |          |
|-------------------------|---|------|--------------------|--|--|----------------|---------------------------------|--------------------------------------|----------|
| VEGETATION PRESERVATION | LATE SERAL AND OLD GROWTH FOREST ECOSYSTEMS8  | VP13 | NUMERICAL STANDARD | Sub-Alpine old growth                              | 61 percent of the Subalpine zone (greater than 8,500 feet elevation) must be in a late seral or old growth condition. The Subalpine zone will contribute 5 percent (7,600 acres) of forested lands towards VP13.   | Non-Attainment | Considerably Worse Than Target  | Insufficient Data to Determine Trend | Low      |
| VEGETATION PRESERVATION | LATE SERAL AND OLD GROWTH FOREST ECOSYSTEMS9  | VP14 | NUMERICAL STANDARD | Upper Montane old growth                           | 60 percent of the Upper Montane zone (between 7,000 and 8,500 feet elevation) must be in a late seral or old growth condition. The Upper Montane zone will contribute 30 percent (45,900 acres) of forested lands towards VP13.                                    | Non-Attainment | Considerably Worse Than Target  | Insufficient Data to Determine Trend | Low      |
| VEGETATION PRESERVATION | LATE SERAL AND OLD GROWTH FOREST ECOSYSTEMS10 | VP15 | NUMERICAL STANDARD | Montane old growth                                 | 48 percent of the Montane zone (lower than 7,000 feet elevation) must be in a late seral or old growth condition; the Montane zone will contribute 20 percent (30,600 acres) of forested lands towards VP13.   | Non-Attainment | Considerably Worse Than Target  | Insufficient Data to Determine Trend | Low      |
| VEGETATION PRESERVATION | UNCOMMON PLANT COMMUNITIES                    | VP16 | NUMERICAL STANDARD | Deepwater plants                                   | Provide for the non-degradation of the natural qualities of any plant community that is uncommon to the Basin or of exceptional scientific, ecological, or scenic value. This threshold shall apply but not be limited to: The deep-water plants of Lake Tahoe.    | Non-Attainment | Considerably Worse Than Target  | Insufficient Data to Determine Trend | Low      |
| VEGETATION PRESERVATION | UNCOMMON PLANT COMMUNITIES                    | VP17 | NUMERICAL STANDARD | Freel Peak   | Provide for the non-degradation of the natural qualities of any plant community that is uncommon to the Basin or of exceptional scientific, ecological, or scenic value. This threshold shall apply but not be limited to: The Freel Peak Cushion Plant community. | Non-Attainment | Somewhat Worse Than Target      | Rapid Decline                        | Low      |
| VEGETATION PRESERVATION | SENSITIVE PLANTS                              | VP18 | NUMERICAL STANDARD | Long-petaled Lewisia - Lewisia pygmaea longipetala | Maintain a minimum of 2 Lewisia pygmaea longipetala population sites.  | Attainment     | Considerably Better Than Target | Little or No Change                  | Moderate |
| VEGETATION PRESERVATION | SENSITIVE PLANTS                              | VP19 | NUMERICAL STANDARD | Cup Lake Drabe - Draba asterophora v. macrocarpa   | Maintain a minimum of 2 Draba asterophora v. macrocarpa population sites   | Attainment     | Considerably Better Than Target | Little or No Change                  | Moderate |

|                         |                          |      |                    |  |  |                         |                                   |                                      |          |
|-------------------------|--------------------------|------|--------------------|--|--|-------------------------|-----------------------------------|--------------------------------------|----------|
| VEGETATION PRESERVATION | SENSITIVE PLANTS         | VP20 | NUMERICAL STANDARD | Tahoe Draba - Draba asterophora v. asterophora   | Maintain a minimum of 5 Draba asterophora v. asterophora macrocarpa population sites.  | Attainment              | Considerably Better Than Target   | Little or No Change                  | Moderate |
| VEGETATION PRESERVATION | SENSITIVE PLANTS         | VP21 | NUMERICAL STANDARD | Tahoe Yellow Cress - Rorippa subumbellata        | Maintain a minimum of 26 Rorippa subumbellata population sites   | Attainment              | Considerably Better Than Target   | Moderate Improvement                 | High     |
| VEGETATION PRESERVATION | SENSITIVE PLANTS         | VP22 | NUMERICAL STANDARD | Galena Rock Cress - Arabis rigidissima v. demote | Maintain a minimum of 7 Arabis rigidissima v. demote population sites.   | Non-Attainment          | Considerably Worse Than Target    | Little or No Change                  | Low      |
| <b>WILDLIFE</b>         |                          |      |                    |  |  |                         |                                   |                                      |          |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W1   | NUMERICAL STANDARD | Goshawk population sites                         | Provide a minimum of 12 Goshawk population sites.  | No Status Determination | No status determination           | Insufficient Data to Determine Trend | Low      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W2   | NUMERICAL STANDARD | Osprey population sites                          | Provide a minimum of 4 Osprey population sites.  | Attainment              | Considerably Better Than Target   | Rapid Improvement                    | Moderate |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W3   | NUMERICAL STANDARD | Bald Eagle Wintering population sites            | Provide a minimum of 2 Bald Eagle (Winter) population sites.   | Attainment              | Considerably Better Than Target   | Rapid Improvement                    | Low      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W4   | NUMERICAL STANDARD | Bald Eagle Nesting population sits               | Provide a minimum of 1 Bald Eagle (Nesting) population sites   | Attainment              | At or Somewhat Better Than Target | Little or No Change                  | Moderate |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W5   | NUMERICAL STANDARD | Golden Eagle population sites                    | Provide a minimum of 4 Golden Eagle population sites   | No Status Determination | No status determination           | Insufficient Data to Determine Trend | Low      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W6   | NUMERICAL STANDARD | Peregrine population sites                       | Provide a minimum of 2 Peregrine population sites.   | Attainment              | Considerably Better Than Target   | Rapid Improvement                    | Moderate |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W7   | NUMERICAL STANDARD | Waterfowl population sites                       | Provide a minimum of 18 Waterfowl population sites.  | Non-Attainment          | Somewhat Worse Than Target        | Little or No Change                  | Low      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W8   | NUMERICAL STANDARD | Goshawk disturbance zone                         | Provide disturbance zones in the most suitable 500 acres surrounding nest site including a 0.25 mile buffer centered on nest sites, and influence zones in 3.5 mi for Goshawk. | Attainment              | Implemented                       | N/A                                  | N/A      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W9   | NUMERICAL STANDARD | Osprey disturbance zone                          | Provide 0.25 mi disturbance zones and 0.6 mi influence zones for Osprey.   | Attainment              | Implemented                       | N/A                                  | N/A      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W10  | NUMERICAL STANDARD | Bald Eagle Wintering disturbance zone            | Provide disturbance zones in mapped areas and influence zones in mapped areas for Bald Eagle (Winter).   | Attainment              | Implemented                       | N/A                                  | N/A      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W11  | NUMERICAL STANDARD | Bald Eagle Nesting disturbance zone              | Provide 0.5 mi disturbance zones and variable influence zones for Bald Eagle (Nesting).  | Attainment              | Implemented                       | N/A                                  | N/A      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W12  | NUMERICAL STANDARD | Golden Eagle disturbance zone                    | Provide 0.25 mi disturbance zones and 9.0 mi influence zones for Golden Eagle.   | Attainment              | Implemented                       | N/A                                  | N/A      |
| WILDLIFE                | SPECIAL INTEREST SPECIES | W13  | NUMERICAL STANDARD | Peregrine disturbance zone                       | Provide 0.25 mi disturbance zones and 7.6 mi influence zones for Peregrine.  | Attainment              | Implemented                       | N/A                                  | N/A      |



|                  |                          |     |                     |                            |  |                |                                   |                                      |     |
|------------------|--------------------------|-----|---------------------|----------------------------|--|----------------|-----------------------------------|--------------------------------------|-----|
| WILDLIFE         | SPECIAL INTEREST SPECIES | W14 | NUMERICAL STANDARD  | Waterfowl disturbance zone | Provide disturbance zones in mapped areas and influence zones in mapped areas for Waterfowl.   | Attainment     | Implemented                       | N/A                                  | N/A |
| WILDLIFE         | SPECIAL INTEREST SPECIES | W15 | NUMERICAL STANDARD  | Deer disturbance zone      | Provide disturbance zones in meadows and influence zones in mapped areas for Deer.   | Attainment     | Implemented                       | N/A                                  | N/A |
| <b>FISHERIES</b> |                          |     |                     |                            |  |                |                                   |                                      |     |
| FISHERIES        | STREAM HABITAT           | F1  | NUMERICAL STANDARD  | Excellent Stream Habitat   | As indicated by the Stream Habitat Quality GIS data, amended May 1997, based upon the re-rated stream scores set forth in Appendix C-1 of the 1996 Evaluation Report, maintain: 75 miles of excellent stream habitat                       | Attainment     | Considerably Better Than Target   | Insufficient Data to Determine Trend | Low |
| FISHERIES        | STREAM HABITAT           | F2  | NUMERICAL STANDARD  | Good Stream Habitat        | As indicated by the Stream Habitat Quality GIS data, amended May 1997, based upon the re-rated stream scores set forth in Appendix C-1 of the 1996 Evaluation Report, maintain: 105 miles of good stream habitat.                          | Non-Attainment | Considerably Worse Than Target    | Insufficient Data to Determine Trend | Low |
| FISHERIES        | STREAM HABITAT           | F3  | NUMERICAL STANDARD  | Marginal Stream Habitat    | As indicated by the Stream Habitat Quality GIS data, amended May 1997, based upon the re-rated stream scores set forth in Appendix C-1 of the 1996 Evaluation Report, maintain: 38 miles of marginal stream habitat.                       | Non-Attainment | Considerably Worse Than Target    | Insufficient Data to Determine Trend | Low |
| FISHERIES        | INSTREAM FLOWS           | F4  | MANAGEMENT STANDARC | Instream Flow              | Until instream flow standards are established in the Regional Plan to protect fishery values, a non-degradation standard shall apply to instream flows.  | Attainment     | Implemented                       | N/A                                  | N/A |
| FISHERIES        | LAKE HABITAT             | F7  | MANAGEMENT STANDARC | Lake Habitat               | A non-degradation standard shall apply to fish habitat in Lake Tahoe. Achieve the equivalent of 5,948 total acres of excellent habitat as indicated by the Prime Fish Habitat GIS Layer as may be amended based on best available science. | Attainment     | At or Somewhat Better Than Target | Insufficient Data to Determine Trend | Low |
| <b>NOISE</b>     |                          |     |                     |                            |  |                |                                   |                                      |     |

|       |                     |    |                    |   |  |                         |
|-------|---------------------|----|--------------------|---|--|-------------------------|
| NOISE | SINGLE NOISE EVENTS | N1 | NUMERICAL STANDARD | Aircraft Noise Departure/Arrival (8am to 8pm)                     | The following maximum noise levels are allowed. All values are in decibels. Aircraft measured 6,500 m-start of takeoff roll 2,000 m-runway threshold approach: 80 dBA - between the hours of 8am and 8pm8  | Non-Attainment          |
| NOISE | SINGLE NOISE EVENTS | N2 | NUMERICAL STANDARD | Aircraft Noise Departure/Arrival (8pm to 8am)                     | The following maximum noise levels are allowed. All values are in decibels. Aircraft measured 6,500 m-start of takeoff roll 2,000 m-runway threshold approach: 77.1 dBA - between the hours of 8pm and 8am | Non-Attainment          |
| NOISE | SINGLE NOISE EVENTS | N3 | NUMERICAL STANDARD | Watercraft-Pass By Test   | Watercraft: Pass-By Test - 82 Lmax - measured 50ft from engine at 3,000rpm.  | No Status Determination |
| NOISE | SINGLE NOISE EVENTS | N4 | NUMERICAL STANDARD | Watercraft-Shoreline Test   | Watercraft: Shoreline test - 75 Lmax - measured with microphone 5 ft. above water, 2 ft., above curve of shore, dock or platform. Watercraft in Lake, no minimum distance.                                 | Non-Attainment          |
| NOISE | SINGLE NOISE EVENTS | N5 | NUMERICAL STANDARD | Pre-1993 Watercraft-Stationary Test                               | Watercraft: Stationary Test - 88 dBA Lmax for boats manufactured before January 1, 1993; Microphone 3.3 feet from exhaust outlet - 5 feet above water.   | No Status Determination |
| NOISE | SINGLE NOISE EVENTS | N6 | NUMERICAL STANDARD | Post 1992 Watercraft-Stationary Test                              | Watercraft: Stationary Test - 90 dBA Lmax for boats manufactured after January 1, 1993; Microphone 3.3 feet from exhaust outlet - 5 feet above water.  | No Status Determination |
| NOISE | SINGLE NOISE EVENTS | N7 | NUMERICAL STANDARD | Motor Vehicles Less than 6,000 GV for speeds less than 35 mph     | Motor Vehicles Less Than 6,000 GVW: 76 dBA – Travelling at speeds less than 35 MPH at a monitoring distance of 50f   | No Status Determination |
| NOISE | SINGLE NOISE EVENTS | N8 | NUMERICAL STANDARD | Motor Vehicles Less Than 6,000 GVW for speeds greater than 35 mph | Motor Vehicles Less Than 6,000 GVW: 82 dBA – Travelling at speeds greater than 35 MPH at a monitoring distance of 50ft.  | No Status Determination |
| NOISE | SINGLE NOISE EVENTS | N9 | NUMERICAL STANDARD | Motor Vehicles Greater than 6,000 GVW for speeds less than 35 mph | Motor Vehicles Greater Than 6,000 GVW: 82 dBA – Travelling at speeds less than 35 MPH at a monitoring distance of 50ft.  | No Status Determination |

|                            |                                      |     |
|----------------------------|--------------------------------------|-----|
| Somewhat Worse Than Target | Insufficient Data to Determine Trend | Low |
| No status determination    | Insufficient Data to Determine Trend | Low |
| No status determination    | N/A                                  | N/A |
| Somewhat Worse Than Target | Little or No Change                  | Low |
| No status determination    | N/A                                  | N/A |
| No status determination    | N/A                                  | N/A |
| No status determination    | N/A                                  | N/A |
| No status determination    | N/A                                  | N/A |
| No status determination    | N/A                                  | N/A |

|       |                         |     |                    |  |   |                         |                                   |                     |          |
|-------|-------------------------|-----|--------------------|--|---|-------------------------|-----------------------------------|---------------------|----------|
| NOISE | SINGLE NOISE EVENTS     | N10 | NUMERICAL STANDARD | Motor Vehicles Greater than 6,000 GVW for speeds greater than 35 mph | Motor Vehicles Greater Than 6,000 GVW: 86 dBA – Travelling at speeds greater than 35 MPH at a monitoring distance of 50ft.                                | No Status Determination | No status determination           | N/A                 | N/A      |
| NOISE | SINGLE NOISE EVENTS     | N11 | NUMERICAL STANDARD | Motorcycles for speeds less than 35 mph                              | Motorcycles: 77 dBA – Travelling at speeds less than 35 MPH at a monitoring distance of 50ft.   | No Status Determination | No status determination           | N/A                 | N/A      |
| NOISE | SINGLE NOISE EVENTS     | N12 | NUMERICAL STANDARD | Motorcycles for speeds greater than 35 mph                           | Motorcycles: 86 dBA – Travelling at speeds greater than 35 MPH at a monitoring distance of 50ft.  | No Status Determination | No status determination           | N/A                 | N/A      |
| NOISE | SINGLE NOISE EVENTS     | N13 | NUMERICAL STANDARD | Off-Road Vehicles for speeds less than 35 mph                        | Off-Road Vehicles: 72 dBA – Travelling at speeds less than 35 MPH at a monitoring distance of 50ft.   | No Status Determination | No status determination           | N/A                 | N/A      |
| NOISE | SINGLE NOISE EVENTS     | N14 | NUMERICAL STANDARD | Off-Road Vehicles for speeds greater than 35 mph                     | Off-Road Vehicles: 86 dBA – Travelling at speeds greater than 35 MPH at a monitoring distance of 50ft.  | No Status Determination | No status determination           | N/A                 | N/A      |
| NOISE | SINGLE NOISE EVENTS     | N15 | NUMERICAL STANDARD | Snowmobiles  | Snowmobiles: 82 dBA – Travelling at speeds less than 35 MPH at a monitoring distance of 50ft.   | No Status Determination | No status determination           | N/A                 | N/A      |
| NOISE | CUMULATIVE NOISE EVENTS | N16 | NUMERICAL STANDARD | High Density Residential Areas                                       | Background noise levels shall not exceed the following levels: 55 dBA CNEL (Average Noise Level) in the High Density Residential Areas Land Use Category. | Non-Attainment          | Somewhat Worse Than Target        | Little or No Change | Moderate |
| NOISE | CUMULATIVE NOISE EVENTS | N17 | NUMERICAL STANDARD | Low Density Residential Areas  | Background noise levels shall not exceed the following levels: 50 dBA CNEL (Average Noise Level) in the Low Density Residential Areas Land Use Category.  | Attainment              | At or Somewhat Better Than Target | Little or No Change | Moderate |
| NOISE | CUMULATIVE NOISE EVENTS | N18 | NUMERICAL STANDARD | Hotel/Motel Areas  | Background noise levels shall not exceed the following levels: 60 dBA CNEL (Average Noise Level) in the Hotel/Motel Areas Land Use Category.              | Attainment              | At or Somewhat Better Than Target | Little or No Change | Moderate |
| NOISE | CUMULATIVE NOISE EVENTS | N19 | NUMERICAL STANDARD | Commercial Areas   | Background noise levels shall not exceed the following levels: 60 dBA CNEL (Average Noise Level) in the Commercial Areas Land Use Category.               | Attainment              | At or Somewhat Better Than Target | Little or No Change | Moderate |
| NOISE | CUMULATIVE NOISE EVENTS | N20 | NUMERICAL STANDARD | Industrial Areas   | Background noise levels shall not exceed the following levels: 65 dBA CNEL (Average Noise Level) in the Industrial Areas Land Use Category.               | Attainment              | At or Somewhat Better Than Target | Little or No Change | Moderate |

|       |                         |     |                    |                                 |  |                |                                   |                                      |          |
|-------|-------------------------|-----|--------------------|---------------------------------|--|----------------|-----------------------------------|--------------------------------------|----------|
| NOISE | CUMULATIVE NOISE EVENTS | N21 | NUMERICAL STANDARD | Urban Outdoor Recreation Areas  | Background noise levels shall not exceed the following levels: 55 dBA CNEL (Average Noise Level) in the Urban Outdoor Recreation Areas Land Use Category.  | Attainment     | At or Somewhat Better Than Target | Little or No Change                  | Moderate |
| NOISE | CUMULATIVE NOISE EVENTS | N22 | NUMERICAL STANDARD | Rural Outdoor Recreation Areas  | Background noise levels shall not exceed the following levels: 50 dBA CNEL (Average Noise Level) in the Rural Outdoor Recreation Areas Land Use Category.  | Attainment     | At or Somewhat Better Than Target | Little or No Change                  | Low      |
| NOISE | CUMULATIVE NOISE EVENTS | N23 | NUMERICAL STANDARD | Wilderness and Roadless Areas   | Background noise levels shall not exceed the following levels: 45 dBA CNEL (Average Noise Level) in the Wilderness and Roadless Areas Land Use Category.   | Attainment     | At or Somewhat Better Than Target | Moderate Improvement                 | Moderate |
| NOISE | CUMULATIVE NOISE EVENTS | N24 | NUMERICAL STANDARD | Critical Wildlife Habitat Areas | Background noise levels shall not exceed the following levels: 45 dBA CNEL (Average Noise Level) in the Critical Wildlife Habitat Areas Land Use Category. | Non-Attainment | Considerably Worse Than Target    | Insufficient Data to Determine Trend | Low      |

**RECREATION**

|            |                                      |    |                  |                            |   |            |             |     |     |
|------------|--------------------------------------|----|------------------|----------------------------|---|------------|-------------|-----|-----|
| RECREATION | HIGH QUALITY RECREATIONAL EXPERIENCE | R1 | POLICY STATEMENT | Recreation Experience      | 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. | Attainment | Implemented | N/A | N/A |
| RECREATION | FAIR SHARE                           | R2 | POLICY STATEMENT | Distribution of Recreation | 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.   | Attainment | Implemented | N/A | N/A |

**SCENIC RESOURCES**

|                  |                             |    |                    |  |  |                            |                                   |                      |      |
|------------------|-----------------------------|----|--------------------|--|--|----------------------------|-----------------------------------|----------------------|------|
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S1 | NUMERICAL STANDARD | Scenic Quality Ratings for Roadway Units   | Maintain or improve the numerical rating assigned each unit, including the scenic quality rating of the individual resources within each unit, as recorded in the Scenic Resources Inventory and shown in: Table 13-3 of the Draft Study Report9   | 63% of units in attainment | At or Somewhat Better Than Target | Little or No Change  | High |
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S2 | NUMERICAL STANDARD | Scenic Quality Ratings for Shoreline Units | Maintain or improve the numerical rating assigned each unit, including the scenic quality rating of the individual resources within each unit, as recorded in the Scenic Resources Inventory and shown in: Table 13-5 of the Draft Study Report10. | 67% of units in attainment | At or Somewhat Better Than Target | Moderate Improvement | High |
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S3 | NUMERICAL STANDARD | Roadway Scenic Resources                   | Maintain or improve the numerical rating assigned each unit, including the scenic quality rating of the individual resources within each unit, as recorded in the Scenic Resources Inventory and shown in: Table 13-8 of the Draft Study Report11. | 98% of units in attainment | At or Somewhat Better Than Target | Little or No Change  | High |
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S4 | NUMERICAL STANDARD | Shoreline Scenic Resources                 | Maintain or improve the numerical rating assigned each unit, including the scenic quality rating of the individual resources within each unit, as recorded in the Scenic Resources Inventory and shown in: Table 13-9 of the Draft Study Report12. | 92% of units in attainment | At or Somewhat Better Than Target | Moderate Improvement | High |
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S5 | NUMERICAL STANDARD | Roadway Travel Route Ratings               | Maintain the 1982 ratings for all roadway and shoreline units as shown in: Table 13-6 of the Draft Study Report13.   | 63% of units in attainment | At or Somewhat Better Than Target | Little or No Change  | High |
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S6 | NUMERICAL STANDARD | Shoreline Travel Route Ratings             | Maintain the 1982 ratings for all roadway and shoreline units as shown in: Table 13-7 of the Draft Study Report14.   | 67% of units in attainment | At or Somewhat Better Than Target | Moderate Improvement | High |

|                  |                             |     |                    |  |   |                              |                                   |                      |      |
|------------------|-----------------------------|-----|--------------------|--|---|------------------------------|-----------------------------------|----------------------|------|
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S7  | NUMERICAL STANDARD | Restore Roadway Scenic Quality                                   | Maintain the 1982 ratings for all roadway and shoreline units as shown in: Restore scenic quality in roadway units rated 15 or below  | 98% of units in attainment   | At or Somewhat Better Than Target | Little or No Change  | High |
| SCENIC RESOURCES | ROADWAY AND SHORELINE UNITS | S8  | NUMERICAL STANDARD | Restore Shoreline Scenic Quality                                 | Maintain the 1982 ratings for all roadway and shoreline units as shown in: Restore scenic quality in shoreline units rated 7 or below.  | 92% of units in attainment   | At or Somewhat Better Than Target | Moderate Improvement | High |
| SCENIC RESOURCES | OTHER AREAS                 | S9  | NUMERICAL STANDARD | Scenic Quality of Other Areas (Recreation Sites and Bike Trails) | Maintain or improve the numerical rating assigned to each identified scenic resource, including individual subcomponent numerical ratings, for views from bike paths and other recreation areas open to the general public as recorded in the 1993 Lake Tahoe Basin Scenic Resource Evaluation. It shall be the policy of the TRPA Governing Body in development of the Regional Plan, in cooperation with local jurisdictions, to insure the height, bulk, texture, form, materials, colors, lighting, signing and other design elements of new, remodeled and | 97.5% of units in attainment | At or Somewhat Better Than Target | Little or No Change  | High |
| SCENIC RESOURCES | BUILT ENVIRONMENT           | S10 | POLICY STATEMENT   | Built Environment  |   | Attainment                   | Implemented                       | N/A                  | N/A  |

Attachment F

Resolutions

F1. TRPA

TAHOE REGIONAL PLANNING AGENCY  
TRPA RESOLUTION NO. 2021- \_\_

RESOLUTION OF THE GOVERNING BOARD OF THE TAHOE REGIONAL PLANNING AGENCY  
TO ADOPT THE 2020 LINKING TAHOE: LAKE TAHOE REGIONAL TRANSPORTATION PLAN  
AND SUSTAINABLE COMMUNITIES STRATEGY

WHEREAS, Article V of the Tahoe Regional Planning Compact (P. L. 96-551, 94 Stat. 3233, 1980) requires that the Tahoe Regional Planning Agency (TRPA) establish a transportation plan for the integrated development of a regional system of transportation as part of the Regional Plan; and

WHEREAS, 2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy was developed in coordination with the updates to the TRPA Regional Plan; and

WHEREAS, both TRPA’s Advisory Planning Commission and TRPA’s Governing Board have conducted noticed public hearings and received public comment on the proposed adoption of 2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy, and at those hearings, oral and written testimony was received and considered; and

WHEREAS, “2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy” (2020 RTP / SCS) has been prepared in accordance with state regulations and requirements, and 2020 RTP / SCS identifies all transportation facilities and assesses capital investment and other measures necessary to preserve the existing transportation system and make the most efficient use of existing transportation facilities to relieve congestion, improve public mobility and address environmental impacts of the transportation system; and

NOW, THEREFORE, BE IT RESOLVED, that the Governing Board of the Tahoe Regional Planning Agency hereby adopts 2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy.

PASSED AND ADOPTED by the Governing Board of the Regional Transportation Planning Agency at its regular meeting held on \_\_\_\_\_, by the following vote:

Ayes:

Nays:

Abstain:

---

Mark Bruce, Chair  
Tahoe Regional Planning Agency  
Governing Board



Attachment F

Resolutions

F2. RTPA

TAHOE REGIONAL PLANNING AGENCY  
ACTING AS REGIONAL TRANSPORTATION PLANNING AGENCY  
(RTPA) RESOLUTION 2021-\_\_

RTPA ADOPTION OF THE 2020 LINKING TAHOE:  
REGIONAL TRANSPORTATION PLAN / SUSTAINABLE COMMUNITIES STRATEGY

WHEREAS, the Tahoe Regional Planning Agency (TRPA) is designated under California Government Code Section 29532.1(b) as a Regional Transportation Planning Agency (RTPA) for the portion of the Tahoe Basin in the State of California; and

WHEREAS, as an RTPA under California Government Code Section 65080, the TRPA has certain responsibilities associated with transportation planning and programming, including the requirement to prepare and adopt a regional transportation plan directed at achieving a coordinated and balanced regional transportation system, including but not limited to mass transportation, highway, railroad, maritime, bicycle, pedestrian, goods movement and aviation facilities and services; and

WHEREAS, “2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy” (2020 RTP / SCS) has been prepared in accordance with state regulations and requirements, and 2020 RTP/ SCS identifies all transportation facilities and assesses capital investment and other measures necessary to preserve the existing transportation system and make the most efficient use of existing transportation facilities to relieve congestion, improve public mobility and address environmental impacts of the transportation system; and

WHEREAS, a Regional Transportation Plan Checklist has been prepared and is incorporated into 2020 RTP / SCS as an Appendix as required by Caltrans and the California Transportation Commission.

NOW, THEREFORE, BE IT RESOLVED, that the TRPA Governing Board, sitting as the Regional Transportation Planning Agency, adopts 2020 Linking Tahoe: Regional Transportation Plan and Sustainable Communities Strategy in compliance with California regulations.

PASSED AND ADOPTED by the Governing Board of the Regional Transportation Planning Agency at its regular meeting held on April 28, 2021, by the following vote:

Ayes:

Nays:

Abstain:

\_\_\_\_\_  
Mark Bruce, Chair  
Tahoe Regional Planning Agency  
Governing Board