

April 26, 2021

To: TRPA Governing Board

Re: Delayed Release of the 2021 Allocations

Agenda Item VIIC

This is to address the upcoming disaster for the hard working tax paying residents of South Lake Tahoe in reference to the upcoming construction season beginning in May of this year. So many contractors, residents, local suppliers, hard working painters, carpenters, cement workers, electrical workers, plumbers along with lumber yards, cement companies, all whose livelihood depends upon the construction industry opening up and breaking ground in May. Needless financial hardship can be eliminated simply by the TRPA governing board's sensitivity and concern for the needs of all of those mentioned above by not delaying the release of the 2021 allocations.

Thank you in advance for your dedication and compassion for the loyal citizens of our great city.

Louise Wigart

2178 Lindenwood Drive

South Lake Tahoe, CA 96150

wigfam@aol.com

From: [rwigart](#)
To: [Marja Ambler](#)
Subject: Allocations for county 2021 building season.
Date: Monday, April 26, 2021 3:11:19 PM

I am a General contractor in South Lake Tahoe

I have been planning all winter to start building a residential home in the county. The planning process is very difficult blueprints,submitting, organizing all my sub contractors and having all my loan payments in order.

Our building season is very short so time lines and exact dates from start to finish is crucial. Myself and my employees depend on the may beginning of the season as our work runs out by spring.

It has been brought to my attention that no allocations will be distributed till the end of June.

This will devastate the season for me my employees and many contractors in the south lake Tahoe area.

Please understand that this action will have a big effect on many in our community.

We as contractors and community members would really like to have a good relationship with the trpa.

Randall wigart

Rwigart construction

Lic. 802266.

Sent from my Verizon, Samsung Galaxy smartphone

From: [Matthew Mapes](#)
To: [Marja Ambler](#)
Subject: 2021 allocations
Date: Monday, April 26, 2021 11:28:48 AM

Matthew Mapes
Mapes Construction
Lic# 1016382
P.O. Box 13796
South Lake Tahoe, CA 96151
530-307-5034

Re: Comments to Governing Board on Agenda item VIIC “2021-2022 release and distribution of residential allocations to El Dorado County, City of South Lake Tahoe, Placer County, Washoe County, and Douglas County”

TRPA Staff and Board,

It is our understanding that TRPA may not release 2021 allocations until July because of a required code amendment triggering a 60 day delay from the date of Board approval anticipated on April 28, 2021. The implications this has on our local workforce, economy and staff that are required to carry out needed work will have compounding consequences. The construction season in Tahoe is already very short and by delaying an early start will force work later into the wet season and could result in unintended environmental consequences. Not allowing a timely construction start contradicts the TRPA mission of “The Tahoe Regional Planning Agency leads the cooperative effort to preserve, restore, and enhance the unique natural and human environment of the Lake Tahoe Region, while improving local communities, and people’s interactions with our irreplaceable environment.” With the less than average winter and rapid snowmelt the conditions, we have before us ideal conditions to start construction.

Economy and environment are two of the key components to a successful program and it simply cannot be sacrificed due to a technicality within an agency compact. Below find impacts directly related to us as community members.

- 1.) Short construction season – Having a limited construction season will not allow ample time to complete projects therefore creating massive loss of revenues to the community and causing environmental harm from those constructing into the wet season / Fall.
- 2.) Grading deadline –
October 15
is the deadline complete grading / winterization. With this delay many variances will be needed causing inadvertent environmental and economic harm
- 3.) Loss of work - Delaying the allocation release will not allow ample time to complete construction forcing many contractors out of work or having massive loss of revenues. Already struggling contractors will suffer losses and work will not be able to be completed in a single field season.
- 4.) Loans / Penalties – Many of the hard money loans individuals’ work with require hard money loans in which are tied to strict construction timelines and the needing of a certificate of occupancy prior to sell or habitation. Much of these require monthly payments in advance which will be made without completing any work on the project. This could bankrupt or send local struggling owners bankrupt or suffering massive losses.
- 5.) Scheduling - Not having any idea when construction will take place makes scheduling a project nearly impossible. This will create a massive rush of disorganized construction leading to failure of the program and its intended purpose.
- 6.) Flow of work – If every contractor is initiating construction at the same time in a rush to complete work, it will make the owner / builder suffer and not allow timely construction sequencing to take place in an already short building window. This is the case for tree removal, grading, foundation, framing, finish work etc.... This will put every project months behind schedule and create massive loss to the community. And at who’s cost?
- 7.) Allocations – Agencies completed great work to secure these and land owners spent a large amount of time navigating a cumbersome and expensive process in anticipation of award.
- 8.) Building Costs – The cost of construction is going up monthly. Delaying project initiation will create elevated cost to the community and unneeded debt.

With the allocation process it is already difficult enough to navigate. Getting on the list, applying for permits, completing engineering/design/architecture, paying the elevated fees, dealing with permit constraints and having no responsive point of contact that responds in an efficient time manner is frustrating enough. And now being a responsible landowner and not having the ability to schedule / complete a project in a building season will cripple those already struggling in this community. The process needs to have more transparency and accountability to the community. Delaying this due to what appears to be negligence of government process is unacceptable. If allocations are anticipated / awarded they must be delivered by the date that grading can be initiated. This can't be held hostage by bureaucratic process and there must be equitable, equal, transparent and accountable guidelines for how / when this occurs.

Please do not withhold this release for an additional 60 days past Governing Board approval, due to a government technicality and oversight. These allocation are due to the community for doing great work in water quality and should be released immediately to avoid losses to the community and environment.

Sent from my iPhone



April 26, 2021

To the Tahoe Regional Planning Agency (TRPA) Governing Board

Mark Bruce – Chair

Cindy Gustafson -Vice Chair

James Lawrence

Shelly Aldean

Alexis Hill

Casey Beyer

A.J. Bud Hicks

Belinda Faustinos

A.J. Bud Hicks

John Friedrich

Wesley Rice

Barbara Cegavske

Sue Novasel

Bill Yeates

CC: Joanne Marchetta TRPA Executive Director, John Marshall TRPA General Counsel, Marja Ambler Clerk to the Board

RE: 4/26/28 TRPA Governing Board Meeting, Agenda Item XII.C. – Release and Distribution of 2021 and 2022 Residential Allocations

Chair Bruce and Members of the Governing Board:

Thank you for this opportunity to comment on the proposed release of the 2021 and 2022 Residential Allocations. The Contractors Association of Truckee Tahoe (CATT) is composed of 400 member companies - builders, specialty contractors, engineers, designers, professional services, and suppliers.

We strongly support your release of both the 2021 and 2022 residential allocations as recommended in the staff report and the Performance Review Committee findings regarding: 1)

residential permit review and code compliance; 2) Lake Tahoe Total Maximum Daily Load (TMDL) implementation; and 3) short-term rental neighborhood compatibility (TRPA Code, Section 50.5).

As was discovered last week, the unexpected required waiting period after passage of a code amendment to update the vehicle miles traveled (VMT) threshold will result in an unanticipated 60 day delay of release of allocations (TRPA Code, Section 50.5.3). This delay will result in upending the building season and will negatively affect the construction and related industries in the Tahoe region. New construction directly provides hundreds of jobs, generates sales tax, and supports the Tahoe economy and workforce. With an already short building season limited by regulatory timeframes and dependent upon weather, cutting it in half makes it difficult and in some cases impossible for planned projects to move forward this summer.

Waiting until early July is far too late in the building season and impacts the construction industry operations and investments. This delay will result in negative impacts including:

- Insecurity in workforce staffing and furloughed or laid off employees
- Building material ordering considerations: cancellations, uncertainty in pricing, storage and shipping, volatile demand
- Loan and funding costs borne by the homeowner
- Overhead on carrying costs for stymied building sites
- Overall uncertainty for construction and related industries
- Impacts to construction related businesses income
- Interruption of businesses ability to provide services and execute carefully planned timeframes

Because of this unseen delay, CATT requests that TRPA staff continue to work with local staff and the public in order to find an emergency solution that will allow for construction to break ground in a timely manner for the 2021 building season. Currently, the demand and waiting lists are within the El Dorado County and City of South Lake Tahoe jurisdictions.

There has been some discussion as to if the jurisdictions in need can “borrow” allocations from other jurisdictions or their existing pools in order to release allocations for projects that are ready to go. Those allocations could then be returned once the code amendment timeframe has passed and allocations are released. We encourage the TRPA to facilitate those conversations and the brainstorming of a timely

process, so that property owners are not waiting two more months to build - which is a costly and harmful impediment.

CATT continues to be an interested stakeholder and community organization that advocates for the vitality of the Lake Tahoe Region. We appreciate your time in reviewing our comments and hope to be included in policy making that affects the real estate and construction related industry.

Respectfully Submitted,



Natalie Yanish
South Lake Tahoe Government Affairs Manager
Contractors Association of Truckee Tahoe
(c) 775.843.7142
<mailto:natalie@ca-tt.com>
www.ca-tt.com



Our Mission: "To promote a positive business environment for the building and housing industry and enhance opportunities for its members and the community"

12313 Soaring Way, Suite 1G, Truckee CA 96161 * 530.550.9999 * info@ca-tt.com * www.ca-tt.com

From: [Russell Wigart](#)
To: [Marja Ambler](#)
Subject: Comments to Governing Board Agenda item VIIC - Allocations
Date: Monday, April 26, 2021 5:27:26 PM

To: TRPA Governing Board
From: Russell Wigart
Re: Public Comment, Agenda Item VIIC, 2021 Allocations

Dear TRPA Governing Board,

The Governing Board needs to release the 2021 allocations and find some way to create an emergency authorization / fix to allow residential construction starting in May 2021. It is my understanding that an oversight from TRPA on a VMT threshold required an amendment and according to the compact requires a 60 day appeal delay. With the already short building season this will push construction projects out 2-3 months, promoting land grading longer into the fall and having impacts on water quality, construction timing and economic hardships. With the cost of material increasing daily and the short window to complete construction this will have a massive negative impact on many facets of the community including owners, contractors, suppliers, materials, realtors etc. The allocations should not be held hostage due to an Air Quality Threshold as they are separate and rely on TMDL implementation and permit monitoring / compliance.

For over 20 years I have been working on pollutant load reduction strategies, research and compliance with the TMDL and the Lake Tahoe clarity program... my entire life and careers work is dedicated to Tahoe, pollutant load reductions and meeting compliance with regulatory objectives. My program in my professional career is not only critical to the health and clarity of Lake Tahoe but also serves as one of the main items to acquiring residential allocations through its compliance.

Unless an administrative fix is made, we could have hundreds of contractors out of jobs, losing work and money, as a result of some executive oversight. And this doesn't just apply to contractors, it is suppliers, manufacturers, people producing products, and realtors. And we are talking millions of dollars from production, contracting, supply, materials, and not to mention housing sales and marketing. The survival of our community depends on it! We absolutely need a public comment period for contractors who are not able to participate in online forums. And yes many of our contractors are not technologically savvy people. Most of our contractors are not zoom and goto meeting friendly individuals. This makes it such that most have no voice. Something to consider for future... That said, we have to have the allocations released immediately. The survival of our community depends on it.

Thank you,

Russell Wigart
[2520 Cold Creek Trail](#)

[South Lake Tahoe, CA 96150](#)

Sent from my iPhone

From: [Abel & Frances Caro](#)
To: [Marja Ambler](#)
Subject: Comments to Governing Board on Agenda item VIIC "2021-2022 release and distribution of residential allocations to El Dorado County, City of South Lake Tahoe, Placer County, Washoe County, and Douglas County"
Date: Monday, April 26, 2021 8:00:29 PM

Abel Caro – A Caro Construction Company
License Number: 628646
1388 Pine Valley Road, South Lake Tahoe Ca, 96150
530-318-0793

TRPA Staff and Board,

It is our understanding that TRPA may not release 2021 allocations until July because of a required code amendment triggering a 60 day delay from the date of Board approval anticipated on April 28, 2021. The implications this has on our local workforce, economy and staff that are required to carry out needed work will have compounding consequences. The construction season in Tahoe is already very short and by delaying an early start will force work later into the wet season and could result in unintended environmental consequences. Not allowing a timely construction start contradicts the TRPA mission of "The Tahoe Regional Planning Agency leads the cooperative effort to preserve, restore, and enhance the unique natural and human environment of the Lake Tahoe Region, while improving local communities, and people's interactions with our irreplaceable environment." With the less than average winter and rapid snowmelt the conditions, we have before us ideal conditions to start construction.

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Alice Schlick
721 Lassen Way, Gardnerville NV 89460
760.379.6833

Re: Comments to Governing Board on Agenda item VIIC "2021-2022 release and distribution of residential allocations to El Dorado County, City of South Lake Tahoe, Placer County, Washoe County, and Douglas County"

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From: [Michaela Mattson](#)
To: [Marja Ambler](#)
Subject: Allocations Agenda Item VII.C
Date: Tuesday, April 27, 2021 7:31:41 AM

Dear TRPA Governing Board,

It has been brought to my attention, that 2021 allocations will not be available until July 2021. As a hardworking and productive community member I have saved my entire live savings to build a home for myself and I have contractors lined up to begin construction in May 2021.

Just getting to the point I am now in this process has taken a long time and this being what feels to be my last chance at home ownership, it is very sad that the TRPA could do this to our community. Aren't our local residents and the economy we produce a valuable asset? What are we to do as building cost climb and are being delayed to construct our home. These allocations have been earned by local governments and we have navigated a very difficult process.

The TRPA board needs to do whatever it can to ensure we don't lose 2-3 months of an already short building window. If I can't construct my home on time I will personally lose 10's of thousands of dollars, not only through building costs increasing but the fact I have a hard money loan that I pay monthly on with high interest required to be paid back by March 2022. I know this is the case for many owners and contractors in this community. This is beyond concerning....

Please release these allocations immediately to avoid damage to our community and the environment.

Sincerely,
Michaela Mattson

April 27, 2021

Tahoe Regional Planning Agency
Regional Plan Implementation Committee & Governing Board
128 Market St., Stateline, NV, 89410
Submitted via email

RE: Vehicle Miles Traveled Threshold Update and Project Level Analysis Assessment

Regional Plan Implementation Committee & Governing Board Chair, Members and TRPA Staff,

The League to Save Lake Tahoe (League) appreciates the opportunity to provide our support for the Vehicle Miles Traveled Threshold Update and Project Level Analysis Assessment (VMT Threshold Update).

The League is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we support transportation solutions for Tahoe and advocate for the implementation of projects and policies contained within regional land use and planning documents that reduce dependence on the private automobile, including the Bi-State Compact (Compact), the 2012 Regional Plan Update (RPU) and the Regional Transportation Plan/Sustainable Communities Strategy (RTP). **The League supports the VMT package included in the RPIC and Governing Board agenda packets and encourages the Committee and Board to adopt the VMT Threshold Update Package.**

The League appreciates being part of the vehicle miles traveled (VMT) working and technical groups. This threshold update and associated tasks are a top priority for the League, and we are happy to see the same level of focus from TRPA. We continue to share the vision expressed at the March 25, 2020 RPIC meeting where staff received direction to "update the current VMT threshold to address greenhouse gas (GHG) emissions, mobility, and other concerns related to vehicle travel (e.g., compact mixed-use development in town centers to reduce reliance on the automobile) so that the updated standard(s) can be applied at both the regional and project levels." With that vision in mind, our goal for the VMT threshold update was **to make sure that the VMT threshold helps ensure Regional Plan and RTP/SCS implementation, and that any VMT increases resulting from these plans include sufficient mitigation.**

For over a year, the League's policy, advocacy, and transportation experts have been deeply involved in updating the VMT threshold. The proposed VMT Threshold Update strikes a good balance between adaptive and prescriptive approaches. The prescriptive approach makes the VMT target and the milestones (triggers) result in repercussions if milestones are not met (responses) clear to everyone involved. The complementary adaptive approach to the VMT Threshold Update (monitoring and advisory body recommendations) is needed in the future as new information becomes available. We would like to thank TRPA staff – especially Dan, Melanie, Michelle, and John Marshall – for spending so much time with us and other

stakeholders to collaboratively address the past deficiencies and current and future needs related to the VMT threshold. The proposed VMT Threshold Update in front of you today demonstrates the success of that collaborative effort. **Some specific aspects of the VMT Threshold Update that the League supports include:**

- New and updated goals and policies which support the objective of the update.
- The VMT per capita metric is appropriate for Tahoe based on dynamics of traveler types and patterns.
- The ability to revisit the target on a regular basis and make the VMT reduction target more ambitious, especially as we begin to implement RTP and RPU in concert.
- Automatic triggers and responses. The proposal includes two sets of automatic triggers and responses. The League consistently advocates for these automatic triggers and responses because they reduce uncertainty and create policies and plans that are more resilient to external factors like changes in leadership, politics, and the economy.
- The advisory body to guide adaptive management. This, along with monitoring, is the cornerstone of the long-term, ongoing adaptive approach.
- Project-level screening criteria that incentivizes development in Town and Regional Centers and provides allowances for affordable housing.
- The mitigation fee update to incentivize development in Town and Regional Centers, prioritize VMT reduction project design and mitigation, and directly support projects included in the RTP.

The redline versions of changes to the materials between meetings allow League staff and the public to evaluate how input and suggestions were addressed. **The League appreciates that our remaining concerns have been addressed, as can be seen in the redline versions since the March RPIC meeting:**

- More details are provided describing the advisory body's composition, role, and types of recommendations. The advisory body will provide accountability and more effectively guide implementation of projects and programs to achieve and maintain the VMT threshold with the requirement for the Governing Board to act on or provide written justification for not acting on advisory body recommendations. The timing of reports are better aligned with RTP updates and VMT reduction target years.
- Specificity is provided on the regional revenue source. For the 2024 revenue target and automatic response, the revenue source must raise at least the amount of money identified in the RTP which ensures that enough money is raised to implement projects and programs that will meet the VMT per capita reduction target.
- The small project screen is reduced from 1,300 VMT to 715 VMT outside of Town Centers.
- The mitigation fee is tied to the RTP constrained project list, and includes annual inflation.
- The additional automatic response to not meeting VMT reduction targets at the 8-year intervals.
- The milestones have been moved up one year to better align with RTP and advisory body and data availability.

We believe the final VMT Package as proposed today meets our goals, and includes most of our general and specific input and suggestions. For these reasons, **we support the VMT package included in the RPIC and Governing Board agenda packets and encourage the Committee and Board to adopt the VMT Threshold Update Package.**

The long process undertaken to update the VMT threshold has proven that we all share the same goals. As the RPIC discussed in March, implementing the RTP, in concert with the RPU, is how we will achieve and maintain the new threshold. Adopting the VMT Threshold Update today is a big step and worthy of celebration. It is one of the early steps towards achieving our shared vision. Going forward, we need to always keep in mind how to achieve the vision most effectively and efficiently. **We ask that the RPIC and Governing Board continuously look for ways to ensure implementation of our regional plans.**

On our end, **the League is committed and looking forward to continuing our work with TRPA staff and other partners to use our new threshold and tools to:**

- Determine the Mobility Mitigation Fee schedule. This fee needs to be high enough for projects in high-VMT areas to incentivize developing in low-VMT areas and include effective mitigation measures. Paying the fee needs to be more expensive than the mitigation to be effective.
- Finalize the project assessment tool. The League has had valid concerns with the previously used tool – TRIA. The tool's structure and the underlying data and assumptions have resulted in questionable outputs. We are encouraged by the ideas we have heard for the new tool that TRPA staff is currently developing, and we look forward to providing input before it is finalized.
- Assist in developing the project impact assessment VMT mitigation monitoring continuously over time. Moving to a per capita VMT efficiency standard is a big change from the absolute VMT standard that the Basin has been operating under since the 1982 adoption of threshold standards. Therefore, it is vital that a monitoring system is created to measure progress toward threshold attainment on the regional and project levels.
- Help ensure effective adaptive management through the new advisory body. This adaptive approach will only be successful if it is guided by robust monitoring data, not only measuring progress toward the VMT reduction target, but also monitoring the effectiveness of implementation actions and ground truthing of project-level assumptions.

Thank you again for your work tackling one of Tahoe's most impactful and persistent environmental problems. We look forward to working with TRPA and stakeholders to achieve what we believe are our common goals.

Sincerely,



Gavin Feiger
Senior Land Use Policy Analyst

966 S凡ver ct
CARSON CITY NV
89705



FOREVER / USA

Tahoe Regional Planning Agency.
Po Box 5310
Stateline NV

894469

To: Tahoe Regional Planning agency

From: Gene Robinson

966 Sunview ct Carson City NV

8970

Dear Sir,

This letter is to serve both the TRPA and the TTD as public comment regarding transportation plans in the Lake Tahoe Basin.

1. Vehicle user fees

The public is not amenable to funding super-sized plans of either un-elected agency with fees that will suppress and gentrify it's own access to our national forest lands in the basin. The notion that residents will pay a pittance whilst non-Basin residents will be fleeced beyond measure for each entry into the basin is both insulting, abhorrent, and shows contempt for the public.

Douglas County commission has already slam-dunked the notion of county residents to pay vehicle fees to access it's own library at Zephyr Cove.

Douglas County residents are every bit as "local" as Basin residents and will have access parity with basin residents.

The TTD has cried "\$2 Billion dollar shortfall" from the rooftops as if entitled to have the public "pony up", but the public is not interested in over-the-top plans.

Discreetive attractions like like the new multi-use trail that have added multi-tier scarring on the eastshore is a perfect example. Is there any terrain not under consideration for recontouring by the TTD agency?

With regard to fees the non-resident public will not tolerate any fee(s), apart from a possible annual pass for the Tahoe Basin paid to the USFS.

Typical single forest passes are \$40 dollars per year. The funds can be shared for "needed" projects in the Basin.

I have briefed both members of Congress on the vehicle fee plan, and both were appalled, just as Douglas County was.

Please cease and desist from attempts to enact fee which will gentrify the visiting public.

2. St Rte 28 east shore of Tahoe

State Rte 28 is designated a National Forest Scenic Byway; and like US Hwy 50 is already publicly funded.

The problems that have evolved are the direct result of hyper-development of the lake which has pushed the public onto the "natural" fragments that are left. The urbanized zones at Lake Tahoe are a nuisance and impediment to the public accessing their National Forest lands. They do not wish to have their access micro-managed or usurped away because of The TRPA's ruinous march to urbanization.

The public I interface with desires no further development(s) on the eastshore apart from widening the hwy for proper parking space. A more than adequate bike trail already exists between the northshore and spooner environs with the Flume Trail. What's more, the visually disturbed corridor is hidden high above in the trees.

Do we need more disturbance of last and best natural segment ~~of~~ of vehicle byway at Lake Tahoe.

I don't think so.

With respect to discretionary parking on Hwy 28 there are segments far from the water's edge that need to be ~~kept~~ retained for low-key discerning visitors just looking for solitude fragments. The area near Skunk Harbor and environs comes to mind. Development incursions into the woods here would be considered as vandalism by the visiting public.

I believe an open-ended ban on parking has advocated by the TRPA Director is not publicly supported. The beautiful woods which line Hwy 28 between Sand Harbor and Spooner need to be left alone.

On access the public is not going to be gentrified by license plate readers or the need for a "smart phone" to access thru public lands.

We cannot violate civil rights with respect to access. Unelected agencies will not be calling all the shots.

3. Closing Comment

The public has watched helplessly while most of Lake Tahoe has been decimated by development. Yes there are some ~~UNSAVORY~~ aspects of visitation by the public, but it pales in comparison to the appalling degradation brought by development.

The plans I am seeing seem to say that to mitigate the aforementioned the public must be ~~suppressed~~ suppressed or even gentrified with respect to access. Your plans speak of "local" contempt for the owning public and their access to public lands in the Basin. Also assertions that members of Congress are irrelevant are in serious error, and I'll be keeping them briefed on any further outlandish plans regarding public access at Lake Tahoe.

Cordially yours,

Gene Robinson
Carson Valley NV

From: [Karen Bender](#)
To: [Marja Ambler](#)
Subject: Residential allocations
Date: Tuesday, April 27, 2021 10:13:42 AM

From: Karen Bender, Resident of South Lake Tahoe

Address: 1168 Early Dawn Trail, South Lake Tahoe, CA 96150
Phone #: 530-318-6425

Re: Comments to Governing Board on Agenda item VIIC “2021-2022 release and distribution of residential allocations to El Dorado County, City of South Lake Tahoe, Placer County, Washoe County, and Douglas County”

TRPA Staff and Board,

I am getting ready to build a new house this year in South Lake Tahoe, CA and I recently found out that TRPA may not release 2021 allocations until July because of a required code amendment triggering a 60 day delay from the date of Board approval anticipated on April 28, 2021.

I plan to live in my new house. It will not be a VHR. I really want to start building as soon as I can. If there is a 60 day delay that could hold up all my contractors. Could you please waive or shorten the 60 day window of approval? Our economy in South Lake Tahoe thrives on a short building season already, so delays of this nature could really hurt us all.

Sincerely,

Karen Bender

From: [Matt Jones](#)
To: [Marja Ambler](#)
Subject: ALLOCATIONS
Date: Tuesday, April 27, 2021 1:15:49 PM

Hello, My Name is Matt Jones. I am a 21yr resident of South Lake Tahoe and owner of Matt Jones Construction. I have heard that trpa will not be releasing allocations until July. The implications of this on our local community will be astronomical. I personally have 3 New residential projects in the county that are waiting for allocations. If TRPA does not release the allocations on weds our whole building season will be in jeopardy, literally taking food out of my children's mouths. TRPA already does not have a good image in the eyes of our local community and this will severely damage it even more. RELEASE THE ALLOCATIONS IMMEDIATELY. Please respond to me as soon as possible.

Matt Jones

From: [SHEMSS Inc.](#)
To: [Marja Ambler](#)
Subject: comments for the April 28th Board Meeting - about ALLOCATIONS
Date: Tuesday, April 27, 2021 11:42:13 AM

To whom it may concern

Hi, My name is Nataliya Shemyakin and I am a local Builder. We are building in Tahoe Basin from 5-10 homes per year. And each year we have an issue with ALLOCATIONS.

For the last several years the TRPA has been issuing allocations later than expected. Especially this year we have received a note from the Building department that the allocations will not be released until the end of June.

This is ridiculous, we have a very short building season in Tahoe basin, that starts May 1 and Ends October 15th, and if allocations release is delayed then it delays the start of construction and puts a big stress on the whole building process. When Allocations are released late a lot of time by the time the building permits are approved it's already the end of building season. We want to submit a complaint about it and a request of Allocations to be released earlier.

Also our question is WHY does TRPA wait till summer to release allocations, WHY can't it be set up that the release of allocations occurs in January- this way it will give people enough time to submit plans and get permits right by the Start of Season on May 1. and not to miss the whole building season.

Please take this in consideration when discussing this issue. We are all here to make our community better and we would like to work together with TRPA to make this process easier.

Thank you,

SHEMSS,
www.shemss.com
Nataliya: 916-370-3267
Serg: 916-240-9823

From: [Doug Flaherty](#)
To: [Marja Ambler](#); [Alexis Hill](#)
Subject: Correction to Public Comment April 28, 2021 - Tahoe Regional Planning Agency Governing Board and Agendized Committee Meetings
Date: Thursday, April 29, 2021 10:48:33 AM

This written public comment request is amended to reflect one typo notated in red below, previously identifying the TRPA Regional Plan Implementation Committee agenda item #3 as Agenda Item #23, now corrected to reflect Agenda Item #3:

RE:

TRPA Regional Plan Implementation Committee (Agenda Item #3, #5 and #6))

TRPA Environmental Improvement, Transportation, & Public Outreach Committee (Agenda Item #2)

TRPA Operations & Governance Committee (Agenda Item #4 and #5)

Please see now my complete and corrected written public comment item in my email below:

Doug Flaherty
Resident
Incline Village NV
TahoeBlue365@gmail.com

On Wed, Apr 28, 2021 at 5:33 AM Doug Flaherty <tahodblue365@gmail.com> wrote:

TO:

TRPA Governing Board Regarding the April 28, 2021 TRPA TAHOE REGIONAL PLANNING AGENCY (TRPA) TAHOE METROPOLITAN PLANNING AGENCY (TMPO)AND TRPA COMMITTEE MEETINGS

RE:

TRPA Regional Plan Implementation Committee (Agenda Item #3, #5 and #6))

TRPA Environmental Improvement, Transportation, & Public Outreach Committee (Agenda Item #2)

TRPA Operations & Governance Committee (Agenda Item #4 and #5)

Public Comment on the Agenda Items Above:

TRPA must not accept nor link the Washoe County Area Plan or the 2020 Tahoe Regional Transportation Plan without a full Environmental Impact Statement including a requirement to include findings that address any potential **significant and adverse cumulative environmental effect impact.**

I want to preface the discussion below with some information on what significant and adverse **cumulative** effect impact means.

Significant and adverse cumulative effect impact occurs from the incremental impact of the action when added to other past, present, or reasonably foreseeable future actions. The cumulative impact National Environmental Protection Act (NEPA) analysis requirement **ensures agencies do not “impermissibly subject the decision making process under NEPA to the tyranny of small decisions.”**

Since it's inception, the TRPA and it's government "partners" have enjoyed the luxury of the tyranny of small decisions at Lake Tahoe Basin's expense. This by not including a **cumulative** adverse effect impact environmental analyses in the TRPA Code of Ordinance Rules of Procedures thereby avoiding the preparation of the same. This includes incremental changes in TRPA Code Sections to satisfy their government "partners" and special interest groups without any requirement whatsoever to identify and discuss adverse **cumulative** effect impacts.

While they may be insignificant by themselves, cumulative impacts accumulate over time, from one or more sources, and can result in the degradation of important resources.

If there ever was a more coveted important environmental resource that deserved the protection of a mandatory "adverse **cumulative** environment effect impact rule, the now threatened to be overrun Jewel of the Sierra, including the entire Basin certainly qualifies. This is common sense.

The TRPA April 2021 "Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy" supporting document is flawed in it's justification to daisy chain the 2020 Transportation Plan based on dated environmental information as far back as the 2012 RTP/SCSEIR/EIS and

the 2017 RTP/SCS IS/IEC documents. **This daisy chaining was arbitrary and capricious and failed to address the cumulative environmental adverse affects** the many projects described in the 2012, 2017 or the proposed 2020 Transportation Plan, especially those concerning road construction and trail projects.

If the 2012 RTP/SCSEIR/EIS and 2017 RTP/SCS IS/IEC (12 years of implementation) have been working so well, where is the data to support any fact whatsoever that the TRPA and the TRT have reduced traffic, air pollution, sediment run off and increased or protected lake clarity in anyway whatsoever.

The answer, as usual, is that the TRPA by design, falls short on any real success data (nor data suggesting failure) and continues to remain unaccountable for the failure to provide ongoing monitoring of close to a thousand or more projects over the last 15 years that have been approved **by TRPA without a cumulative adverse environmental effect analyses.**

This includes the TRPA's failure to provide even one adequate state of the art EBAM monitor, to monitor each and every pollutant listed in TRPA's air monitoring standard language including the failure to provide adequate real time and transparent 365 degree lake basin air monitoring of PM2.5, PM10 and OZONE. This represents an abysmal failure of responsibility on the part of TRPA to monitor and protect Lake Tahoe Basin air quality. Yet TRPA continues to approve cumulative impact projects that adversely effect Lake Tahoe Basin air quality on a daily basis without adequate and accurate air monitoring.

In fact, it could be reasonably argued that the proposed 2020 Transportation Plan may actually serve to build significantly more public capacity making it much more convenient for untold thousands and thousands of vehicle trips a year to occur from outside the Tahoe Basin. This of course resulting in increasing air pollution, dust and sediment run off, human and animal deposits of urine, feces and trash, impacts on sewer treatment facilities, huge increases in garbage removal trips and increased service demands on our public safety, degradation and population endangerment as a result of gridlocked fire escape routes as

well as a significant adverse effect on other local, county and state resources serving and assigned to the Tahoe Basin.

One only needs to look at the results of increasing capacity via the concept of widening of freeways and adding commuter lanes in California to validate the well demonstrated adage "build it and they will come" Eventually gridlock happens.

Increased visitor capacity and convenience will have a significant adverse environmental and adverse cumulative environmental effect on the Lake Tahoe Basin and serve as just one more example of the TTD, TRPA and their government and special interest "partners" failure to adequately address, under NEPA, the adverse **cumulative** effect of what could be close to one thousand or more Lake Tahoe Basin **cumulative** impact projects over the last 15 years.

As far as the Washoe County Area plan is concerned, the significantly modified plan contains a plethora of projects and policies that will have a significant and **cumulative** adverse environmental impact and effect on not only Incline Village, NV but all of the Lake Tahoe Basin. These impacts will undoubtedly include 1000's of increased trips a year just based on it's reckless short term rental policies alone.

These adverse **cumulative** environmental effect projects and policies will result in adding capacity within the Lake Tahoe Basin, thereby increasing air pollution, dust and sediment run off, human and animal deposits of urine, feces and trash, impacts on sewer treatment facilities, significant increases in garbage removal trips and increased service demands on our public safety resources, population endangerment as a result of gridlocked fire escape routes as well as a significant adverse **cumulative** effects on other local, county and state resources serving and assigned to the Tahoe Basin.

I urge the Governing Board and Committees to vote no on accepting nor linking the Washoe County Area the 2020 Tahoe Transportation Plan nor the Washoe County Area plan without a full Environmental Impact Statement including a requirement to include findings to identify and address **all associated cumulative environmental effect impacts**.

Doug Flaherty
Resident

Incline Village NV
TahoeBlue365@gmail.com

Public Comment RPIC 4.28.2021 Agenda Item VII 4, 5, 6 and Governing Board Agenda Item VII A, B re RTP and related items

Submitted by Carole Black, Incline Village resident

I have previously submitted recommendations re the TRPA RTP to various TRPA committees. Themes include:

- Safety and neighborhood compatibility re transit in communities
- Balancing/optimizing Quality of Life in communities/neighborhoods with business objectives
- Maintaining flexibility in planned interventions, e.g., re mobility hubs, to match 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

In my view, these themes are important guideposts and I have appreciated staff's willingness to address with important edits particularly related to maintaining flexibility in design considerations, robust planning and data monitoring/analysis, interfaces with neighborhoods/communities and rigorous attention to environmental impacts. I remain concerned about ensuring that initial planning and environmental impact review is robust, comprehensive, data/measurement-based and coupled with ongoing measurement and mitigation as indicated.

Especially for projects, the role of the EIC for initial review vs. more detailed data-based, quantitative assessment needs further exploration and clarification. An example is actually included in the Tahoe Area Plan EIC – some air quality metrics (e.g., ozone) are drifting slightly adversely though EIC was still able to make a favorable finding. Nonetheless, this is, and should be, an indicator to follow closely with prompt intervention as indicated.

A few more detailed questions/comments for today:

I. Appendix B: Regional Plan Amendments

- Goal 2: Connectivity 2. 4 Policy: Collaborate with nearby communities that share transportation to and from the Tahoe Basin, including the Town of Truckee, the Placer County/Resort Triangle, Sacramento, Bay Area, Reno, and the Carson/Minden Valley. *Why is Reno omitted?*
- GOAL DP-5 TRPA SHALL USE A SERIES OF MILESTONES TO ADAPTIVELY MANAGE REGIONAL LAND USE AND THE TRANSPORTATION SYSTEM TO ACHIEVE AND MAINTAIN THE PER CAPITA VMT TRANSPORTATION AND SUSTAINABLE ???
Some wording may be missing?
- Goal DP 5.2 Technical Advisory Body > suggest consider adding evaluation of project performance vs projected environmental impacts to understand expected vs actual and iteratively improve/ optimize the initial environmental EIC assessment process. I am also confused re prior mention made of 2yr measurement cycle with adjustments yet I am seeing mentions of 4 year cycles – more frequent checks helpful with course adjustment as indicated.

II. Appendix C: Code of Ordinance changes:

2.2 Project Review ... Projects requiring GB or Hearing Officer Review - are the same standards and levels of required review applied to public and private projects? How is EIC vs EIS determined? How is effectiveness of EI review type's performance measured and how are indications chosen?

2.3 Exempt activities ...What retrospective analysis of outcomes is performed? To assess accuracy of estimated impacts

65.2 Recent wording adjustment recognizing that Mobility Hubs may require additional review is helpful and important. There may be other types of examples to also consider for example the East Tahoe Trail impacts on traffic and parking in Incline which were not adequately predicted and mitigated. We previously mentioned the recent adverse event near the OES site where within the last few weeks a 5 year old child was struck by a vehicle and helicoptered to Reno hospital. This sort of accident could also easily occur in other very congested settings with illegally parked vehicles as occurred following the opening of the EST. Is there a plan for follow-up analysis of impacts of various projects with measurements to inform both mitigation and potential future assessments?

III. Appendix D Project Impact Analysis

Fig 1 pg 3-7:

- A. where do public projects fit on the diagrams and in the following tables?
- B. We hope that the planned review for Hubs will include qualitative/quantitative projections and follow-up measurement and mitigation as indicated
- C. Where would the East Shore Trail impact on traffic, VMT, added vehicle volume in Incline fit?
- D. VMT calculation appears very theoretical – how is this model verified by actual measurement? For example, how would a residence used as an STR full-time be calculated vs the same residence used as a non-rented vacation home 35% of the year

Public Comment for TRPA 4.28.2021: RPIC agenda item #3 Washoe County Tahoe Area Plan

Good-day. These comments are submitted by Carole Black, Incline Village, NV resident:

Comment regarding Washoe County Tahoe Area Plan. I and others have previously submitted related written comments to WC and TRPA. The currently proposed WC Tahoe Area Plan represents an intense effort and envisions broad change with impacts anticipated for many years to come. Unfortunately, there are significant concerns in two major categories: process and content.

PROCESS: Plan is long, complex and has undergone major revision over several years. For a document of this size, complexity and import, the level of public explanation/discussion opportunity to date has been infrequent and insufficient. As well documented in the staff report, there were a few sessions years ago but nothing since recent revisions over last two years. By comparison, where I own another property, a comparable process included chapter by chapter review in working sessions with extensive public discussion.

CONTENT: There are also priority content concerns: The single public Area Plan presentation two years ago was inaccurate obscuring major proposed changes. Specifically, though there are in fact major changes in zoning approach, an inaccurate statement was repeatedly made at public meeting and remains: "there are no zoning changes [except a few related to Fairway and Ponderosa areas]." This is simply incorrect and misleading!

In addition, the proposal includes content which is misleading and/or incomplete:

1. Major Plan changes result from de facto adoption of TRPA zoning even though WC classification may be more restrictive and therefore historically “compatible with TRPA.”

Curiously the statement that more restrictive approaches are allowed seems to have disappeared? And resident concerns about the impacts of imposed Town Center design and density in this small area have largely been ignored

2. Incomplete assumptions are included regarding Area Occupancy: Residents are considered but not transient tourists who have recently substantially increased area occupancy particularly during busy seasons with more vehicles and people in the area. Impacts are thus not projected correctly re safety, evacuation, environment as well as loss of housing supply and neighborhood compatibility.

3. Area Plan priorities do not reliably address root causes, e.g., Transportation and Parking. Much emphasis on trails, paths, and public transport systems yet no attention to the underlying root cause of added occupancy from transient tourism bringing more people and vehicles. A comprehensive Area Occupancy Plan is needed with matching emergency capability and a data driven Transport analysis and program plan. Recent Mobility Hub edits fail to capture the significant discussion and updating with needed concept flexibility now included in RTP, e.g., intercepts before Incline are needed to handle overflow Rte 28 corridor parking and the reference to two Incline hubs is incorrect > I checked every RTP diagram > not there!

4. Robust, timely measurement has been a challenge though efforts to address are added to RTP and should be added here.

CONCLUSION: WC Tahoe Area Plan as currently drafted includes elements of significant concern to me, my family and other residents and is not ready for approval. Your constituents deserve better!

April 27, 2021

Tahoe Regional Planning Agency
Environmental Improvement, Transportation & Public Outreach Committee and Governing Board
128 Market St., Stateline, NV 89449
Submitted via email

Re: 2020 Linking Tahoe: Regional Transportation Plan & Sustainable Communities Strategy

Environmental Improvement, Transportation & Public Outreach Committee, Governing Board, and TRPA staff:

The League to Save Lake Tahoe (League) appreciates the opportunity to provide our support for the Draft 2020 Linking Tahoe: Regional Transportation Plan (RTP or Plan) prepared by the Tahoe Regional Planning Agency (TRPA). **We encourage the Committee to recommend adopting the RTP, and the Governing Board to adopt the Plan and environmental findings.**

The League advocates for an improved transportation system to reduce the environmental impact on the Lake and our environment. The League has been involved in the development and implementation of every RTP to date. This 2020 RTP is one of the better ones we have seen – the goals and policies remain strong and relevant and the updated project list and focus areas appear more germane and achievable. 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 allows 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. If carried out successfully, this 2020 Plan will represent real, tangible progress for the entire Tahoe region. **We support the 2020 RTP and want to see more implementation and progress tracking before the next scheduled Plan update.**

Most of the straightforward changes the League requested after reviewing the Draft RTP in October 2020 were incorporated:

- Highlighted priorities from the Bi-State Consultation on Transportation.
- More focus on microtransit and emerging technologies.
- Clarified explanation of funding sources and the constrained vs unconstrained project lists.
- Added policies around parking management.
- Included implementation of Commute Tahoe program. We are more than excited to see the Employer-Based Trip Reduction Program (Commute Tahoe) finally being implemented after being in the TRPA Code for almost 30 years. We look forward to helping make it a success.

In order to successfully implement all aspects of the 2020 RTP and the related VMT Threshold update, there are **two overarching comments we provided in October of last year that still need to be addressed: project prioritization, and robust monitoring with adaptive management.** While these suggestions were not addressed in the Final RTP before you today, we still believe they can help accelerate and ensure implementation; and provide helpful information for the next RTP update.

Project Prioritization

We recognize that the federally mandated RTP does not have a mechanism for project prioritization, but we believe prioritization is necessary to strategically implement the RTP effectively and efficiently. League and TRPA staff have discussed various mechanisms for project prioritization outside of the RTP document. We have been encouraged to hear that the Technical Transportation Implementation Committee (TTIC) will be working on prioritizing projects based on various transportation goals. Adaptive management and project prioritization can also be achieved through the advisory body that will be established to track progress toward the attaining the VMT threshold. **The League asks the EIPPO Committee and the Governing Board to ensure that the TTIC and VMT Advisory Body adopt and implement project prioritization.**

Robust Monitoring and Adaptive Management

In October, we asked for an analysis or summary of how we performed as a region in terms of implementing the 2017 RTP. Monitoring and analysis are needed that goes beyond the performance measures required by the State and Federal governments - monitoring and analysis that identifies the number or percentage of projects completed in each category and includes progress toward specific plan goals. The transit performance measures listed in Appendix I under "Transit Monitoring Protocol" are a good example of this monitoring and analysis. Tracking performance measures for all categories is key to adaptively implementing the 2020 RTP and preparing for the next Plan update.

While more monitoring and adaptive management is not explicitly included in the 2020 RTP, TRPA staff have included more monitoring in the 2020-21 Transportation Overall Work Program (OWP) workplan (Element 105). Also included in the OWP (Element 107) is monitoring and performance-based planning which, for transit providers, should include more monitoring, analysis and accountability. **We encourage the Governing Board to direct TRPA staff to update the MOU between TRPA and transit providers to ensure more robust data collection and recommend performance-based funding allocations.**

We support and recognize the RTP as an essential step in implementing sustainable, long-term transportation solutions in the Lake Tahoe Basin. Thank you for your time and considering how our suggestions can be incorporated into the Plan and implementation.

Sincerely,



Gavin Feiger
Senior Land Use Policy Analyst