

To All TRPA Governing Board members:

I acknowledge and honor that substantial TRPA staff time has gone into the proposed Mobility Mitigation Fee update. And while I believe everyone involved is well-intentioned, this policy update is bred from the same incremental thinking and “tax the developers” logic that we’ve been expecting would reduce VMT for decades, and it hasn’t worked. Today we have far more vehicle trips than Tahoe’s antiquated infrastructure can handle, dilapidated downtowns that are desperate for reinvestment and redevelopment, a serious workforce housing and affordability crisis, and a lack of economic opportunity for young talent in the Basin. This policy is not likely to substantially reduce VMT. Rather, it is going to continue to exacerbate the crises I just listed. Eliminating minimum parking requirements and implementing performance-based parking management is necessary to achieve significant VMT reductions AND generate revenue to fund the multi-modal transportation system and vibrant downtowns called for in the Regional Plan.

Revenue for transportation system investments should be generated from the incoming vehicles and drivers themselves. The expected revenue from the MMF is a tiny drop in the bucket towards what is needed for a truly sustainable transportation system in Tahoe, yet it adds cost and complexity to our already ridiculously costly and complex development process. A continued lack of reinvestment and redevelopment in our town centers is going to continue to push good jobs and opportunities to grow local wealth outside of the Basin. Local business owners (and aspiring business owners) are working hard to ensure that Tahoe can sustain a strong year-round community and doesn’t become just a place for vacation, day-use recreation and wealthy retirees. Does this proposed policy support local business owners/entrepreneurs and local residents?

We need vibrant town centers with a mix of thriving local businesses to give people a good reason to get out of their cars and engage in multi-modal transportation. Take a walk through downtown Kings Beach and you will see dozens of empty buildings and vacant lots with great redevelopment potential, but no action. The increased development fees attached to this policy are yet another disincentive to redevelop properties in Kings Beach and most other town centers around the Basin. The Kings Beach Commercial Core Improvement Project invested more than \$50m in the town center but sales tax revenue has not grown because we STILL lack the necessary redevelopment to reverse the decades-old blight.

TRPA has been narrowly focused on “mitigating” our way to environmental threshold attainment for decades. And it is simply not working. Not only are we not attaining most thresholds, but there have been significant unintended consequences for our local communities and regional economy. It’s time to completely reframe our policymaking and challenge ourselves to create real TRIPLE BOTTOM LINE sustainability – ENVIRONMENT, ECONOMY, COMMUNITY. No policy operates in a vacuum.

The bottom line is that we’ve got 70+ years of auto-dependent planning policies to overcome and reverse. The results we all want require bold action by policymakers, not incremental changes that preserve the status quo. Otherwise, our past is going to become our future. We need real vision and

leadership. And unfortunately, I am just not seeing any of that in this proposed Mobility Mitigation Fee update.

While the proposal for a Basin-wide entry fee is hung up at the State level, let's focus on implementing a well-coordinated zonal fee program, a serious overhaul of local parking codes (starting with elimination of minimum parking requirements), and a commitment to comprehensive parking management throughout the Basin. These actions would lead to a significant reduction in VMT while also strengthening our Tahoe Basin communities and economy.

Feel free to reach out to me any time. I am here to help.

Thank you, Kevin Drake

#### **GOOD RESOURCES:**

The State of CA strongly encourages progressive parking policy and eliminating minimum parking requirements. Just take a look at Section 1 of CA Assembly Bill 744 passed back in 2015.

[https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill\\_id=201520160AB744](https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=201520160AB744)

I encourage you to listen to an episode or two of the Reinventing Parking podcast, specifically the 20 minute show about "getting parking prices right in CA cities, big and small" on 3/8/21:

<https://www.reinventingparking.org/p/podcast.html>

Donald Shoup is one of the leading thinkers (and practitioners) in progressive parking reform. Here is a great essay called "Parking Reform Will Save the City": <https://www.route-fifty.com/infrastructure/2019/09/parking-reform-will-save-city/160065/>

**ABOUT ME:** I am a 17-year resident and property owner in Kings Beach, a business owner in Incline Village and Truckee (Alibi Ale Works), and your Placer County Layperson on Advisory Planning Commission. My professional background was environmental planning and restoration, prior to opening Alibi Ale Works in 2014.

#### **Kevin Drake**

Co-Founder

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**From:** Andrew Ryan <[andrew@prdei.com](mailto:andrew@prdei.com)>

**Date:** December 14, 2021 at 9:49:36 PM PST

**To:** [GoverningBoard@trpa.gov](mailto:GoverningBoard@trpa.gov)

**Cc:** Melanie Sloan <[msloan@trpa.gov](mailto:msloan@trpa.gov)>, Cindy Gustafson <[cindygustafson@placer.ca.gov](mailto:cindygustafson@placer.ca.gov)>

**Subject:** Mobility Mitigation Fee Update Public Comment

Dear Governing Board Members

I provided a similar comment to the APC.

I was a member of the TAC and volunteered approximately 45 hours on this program. I believe I was the only non-agency participant from N. Lake Tahoe. The TAC was almost exclusively Agency stakeholders.

Here are some thoughts and feelings regarding the Mobility Mitigation Fee:

- My interests are building a vibrant community that is inclusive, has a protected environment, has opportunity for all levels of wealth and retains the wealth locally. This is why I offered my time on the TAC, to represent my community and to advocate against policies that harm my community, introduce more fragility, and have historically not delivered environmental improvement or protection.
- This program and resulting mitigation fees only consider in-Basin VMT generation. During the TAC, I requested modeling comparing a near basin project with an in basin project to demonstrate that our Town Centers can remain economically viable with near basin development. As it has been for the last three or more decades, near basin projects have increased dramatically and will continue to do so with expansions in Truckee, Auburn, Reno, Sparks, and Carson City. Those areas send significant commuters, service workers, construction workers, and day trip recreation to the Basin. The length of those trips is only considered once they enter the Basin. This puts Basin projects at a mathematical disadvantage and makes for poor policy decisions as climate change effects do not care about the Basin boundary. Personally, I have watched local businesses leave to still service this area. In every way but, a Basin only VMT calculation, their relocation is a damaging local impact.
- Staff has attributed 90% of the impact to VMT generators and has identified those generators as new residential, new TAU, and campgrounds. In order to do so they are basing these on Institute of Traffic Engineers (ITE) trip generation multipliers for land use and data analysis. The problem is that both the ITE standards and the current car centric development pattern (since at least the 1940s) are a self fulfilling prophecy for more autos and vmt generation so one cannot base the future of mixed modal, walkability, and transit oriented development on those standards or patterns like this program does. Furthermore, we know recreation and day use are the biggest vmt generators. TAU development, new employment, and housing within Town Centers should reduce VMT if the community is built on a triple bottom line and free abundant parking is managed.
- To actually achieve multi-modal gains a Town has to have all elements including recreation, dining, entertainment, employment, schools, and services. A fee on the wanted development is a disincentive. The adage of "incentivize what you want and tax what you don't" applies here.
- As a licensed civil engineer I have been eating and digesting these problems for more than two decades in the basin. More top down policy is not the solution and remember this fee is only one part of the multitude of regulatory hurdles that have created blight in nearly all town

centers around the basin. Planning in silos is why the Basin experiences crisis level problems. TRPA rewards the wealthy as they are the only ones who can complete the permitting process or make decisions not based upon cost. The Lakeshore has some of the most expensive homes in the world and the Towns, like Kings Beach, are under economic collapse. The wealthy are uninterested in the economic returns in the Towns and the townsfolk cannot afford it. I question how a fee is the solution?

- It is not possible to lead to the future vision and use the same policy tools that created the current conditions. The Mobility Mitigation Fee is just a repackaging of the same program with a few added exemptions due to crisis. What is needed is a departure from conventional planning methods that use land use as proxy for vmt. Real incentives are needed to convert the current car-centric Tahoe Basin. I believe these reductions in VMT, that TRPA is hoping to achieve, only come from strong communities and planning that considers patterns beyond the basin only vmt threshold calculation.
- I question this program from a perspective of fragility and whether or not it is strengthening the town, resulting in more community, supporting the schools, and providing economic opportunity. We know just setting an environmental standard is not holistic and we know that approach doesn't work long term. In Kings Beach, the results of the "pilot study" are in, they can be seen and they can be touched. We should expect and demand the triple bottom line.

This program should be ensuring the future is better than the present, not just satisfying the Attorney General's narrow interest regarding in-basin vmt compliance.

I offer an open invitation to the Board, as a whole or individually, to come to Kings Beach for a walking tour to see the problems and see why this compartmentalized analysis and fee charging is problematic; why it's more likely to continue the same problems that result in further fragility. It helps to have the discussion standing in the problems.

To correct the challenges that our communities are facing we all need to pull in the same direction for change and the solutions need to be bottom up. Thank you for considering these thoughts.

my best  
Andrew Ryan

Andrew T. Ryan PE

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December 15, 2021

Tahoe Regional Planning Agency  
Governing Board  
128 Market St., Stateline, NV 89410  
*Submitted via email*

RE: Mobility Mitigation Fee Update

Operations & Governance Committee and Governing Board Chair, members, and TRPA staff-

The League to Save Lake Tahoe (League) would like to thank TRPA staff for continuing to work closely with us following the VMT Threshold update to finalize the Mobility Mitigation Fee update. Especially Melanie Sloan who has taken the time to keep us updated and respond to our few concerns. This fee update was an integral piece of the Threshold update that we are excited to see coming close to finalization.

We support the proposal presented today. The key aspects we identified through the VMT threshold update are included – automatic annual increases tied to inflation and a location-based sliding rate. We appreciate the thorough analysis by staff to back up the proposed fee.

We support exempting affordable housing in this case, even though it could reduce revenue from the fee by about \$4.5 million over the life of the RTP. The temporary nature of the exemption will hopefully provide an incentive to speed up development of deed restricted affordable housing near town centers. And the monitoring and recommendations through the VMT Advisory Body every two years will help ensure we are meeting the two goals – raising funding needed to implement the RTP while also encouraging affordable housing. We continue to request robust monitoring of affordable housing, and Sugar Pine Village in particular, to ensure the assumptions about affordable housing and VMT are accurate.

We also support giving credit where it is due, especially in the current case of Placer County, if we are still meeting our *regional* revenue funding targets. We look forward to seeing what options the team comes up with.

Thank you for your time and critical thinking on this important fee update.

Sincerely,



Gavin Feiger  
On behalf of the League to Save Lake Tahoe  
Senior Land Use Policy Analyst