

The below matrix catalogues all public comment received during the 30-day public comment period from February 22, 2017 to March 24, 2017.

Draft 2017 Regional Transportation Plan Public Comment Record					
Number	Name	Organization Type	Date Received	Comment Topic	Date of Response
1	Barbara Sourikoff	Citizen	3.6.17	Project: U.S. 50 Safety Improvement and Complete Streets	3.6.17
2	Bob Barnett	Citizen	2.28.17	Adaptive Roadway Management on SR 89	3.7.17
3	Bob Hodson	Citizen	3.14.17	Project: U.S. 50 Safety Improvement and Complete Streets	3.16.17
4	Bob Zimmerman	Citizen	3.22.17	Broadband, Transit, Mobility Hubs, Funding	3.23.17
5	Brad Shelton	Citizen	3.23.17	Multi-Modal: Bicycle Carrying Capacity on Transit	3.27.17
6	California Department of Transportation	State	3.20.17	Technical Corrections, Airport, Project Corrections	4.10.17
7	Carson Area Metropolitan Planning Organization	Regional	3.22.17	Technical Edits and Transit	3.30.17
8	Community Mobility Group	Advocacy	3.23.17	Projects: U.S. Highway 50 Water Quality Improvement Project - "Y" to Trout Creek and Al Tahoe Safety and Mobility Enhancement Project and Goals and Policies	4.11.17
9	Dana Mare	Citizen	3.24.17	Transit, Ferry, and Airport	3.30.17
10	David Briscoe	Citizen	2.22.17	Congestion	2.23.17
11	David Meyers	Citizen	2.23.17	Airport	2.24.17
12	Don Hale	Citizen	2.24.17	Congestion, Funding, Housing	3.7.17
13	Doug Mann	Citizen	3.23.17	Multi-Modal: Bicycle Carrying Capacity on Transit	3.24.17
14	Eric Beavers	Citizen	3.17.17	Congestion, Population Growth	3.27.17
15	Friends of the West Shore	Non-Profit Community and Environmental Organization	3.22.17	No Net VMT, Parking, Funding, Special Events, IEC Analysis	4.10.17
16	Gary Mendivil	Citizen	3.24.17	Multiple Topics	4.11.17
17	Jim Weber	Citizen	3.22.17	Multi-Modal: Bus stop shelters	3.23.17
18	John Drum	Citizen	3.21.17	Roundabouts, Closing Gaps in Path System, Transit, Year-Round Trail Maintenance, Dig Once Policy	3.27.17
19	John Grigsby	Citizen	3.24.17	Project: U.S. 50 Safety Improvement and Complete Streets, update on existing projects, and Multi-Modal: Bicycle Carrying Capacity on Transit	3.31.17
20	Kathryn Biasotti	Citizen	3.17.17	Collaboration and Support for Vision	3.22.17

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Number	Name	Organization Type	Date Received	Comment Topic	Date of Response
21	Kevin Starr	Citizen	3.8.17	Back Country Access, Project: SR 89 Recreation Corridor Improvements	3.16.17
22	Kira Smith	Citizen	3.7.17	Transit, Mobility Hubs, Multi-Modal	3.16.17
23	Lake Tahoe Bicycle Coalition	Non-Profit Advocacy Organization	3.24.17	Support for various shared-use path projects and Safe Routes to School	4.11.17
24	League to Save Lake Tahoe	Non-Profit Environmental Organization	3.20.17	No Net VMT, Parking, Pilot Projects, Transportation Demand Management, Adaptive Roadway Management	4.10.17
25	Lindell Price	Citizen	3.24.17	Active Transportation	3.31.17
26	Loren Jolley	Citizen	3.24.17	Multi-Modal: Bicycle Carrying Capacity on Transit	3.24.17
27	Meeks Bay Vista Property Owners' Association	Property Owners Association	3.9.17	Project: Conceptual Path Meeks Bay to Rubicon Bay	3.13.17
28	Michael Snead	Citizen	3.23.17	Multi-Modal: Bicycle Carrying Capacity on Transit	3.24.17
29	Michaela Rudis	Citizen	3.13.17	Transit	3.16.17
30	Nancy Schmidt	Citizen	3.8.17	Update on existing projects along SR 89, and not proposed bike route within Rubicon Bay	3.16.17
31	North Lake Tahoe Resort Association	Association	3.23.17	Support for Plan and Incorporation of Truckee North Tahoe Transportation Management Association Comments	4.11.17
32	Obljo Nilsson	Citizen	3.23.17	Parking Management Strategies and Mobility Hubs	3.24.17
33	Patty Psilopoulos	Citizen	2.23.17	Roundabouts	2.24.17
34	Placer County	Local Government	3.23.17	Multiple Comments	4.10.17
35	Placer County Air Pollution Control District	Local Government District	3.24.17	Electric Bus fleet, Renewable Energy, Bike Share	4.11.17
36	Ric Morrison	Citizen	2.25.17	Not proposed bike route within Rubicon Bay	3.6.17
37	Scott Brownbul	Citizen	3.8.17	Support for Path Connection	3.16.17
38	Scott Shane	Citizen	2.24.17	Transit, Neighborhood cut through traffic	3.7.17
39	South Lake Tahoe Bicycle Advisory Committee	Advisory Committee	3.22.17	Technical Corrections, Year-Round Maintenance, Goal 2: Connectivity	4.11.17
40	South Shore Transportation Management Association	Association	3.23.17	Enhanced Discussion of Neighboring Connections, Adaptive Roadway Management, Policies, Project: AL Tahoe Safety and Mobility Enhancement, and Technical Corrections	4.11.17
41	Stephan Haas	Citizen	2.25.17	Mobility Hubs, Tolls/Funding, Adaptive Roadway Management	3.7.17

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Number	Name	Organization Type	Date Received	Comment Topic	Date of Response
42	Tahoe Area Sierra Club	Non-Profit Environmental Organization	3.22.17	No Net VMT, Parking, Funding, Special Events, IEC Analysis	4.10.17
43	Tahoe Backcountry Alliance	Advocacy	3.23.17	Winter Recreation Access, Parking	4.11.17
44	Tahoe Prosperity Center	Non-Profit	3.22.17	Codifying Dig Once Policy	3.30.17
45	Tahoe Rim Trail Association	Non-Profit	3.7.17	Technical Corrections, Addition of Data, Transit Infrastructure	4.10.17
46	Tamara Wallace	Citizen	3.23.17	Project: U.S. Highway 50 Community Revitalization	4.11.17
47	Todd Johnston	Citizen	3.23.17	Multi-Modal: Bicycle Carrying Capacity on Transit	3.24.17
48	Town of Truckee	Local Government	3.22.17	Partnership, Mobility Hubs, Funding, Inter-Regional Transit, Technical Corrections	3.31.17
49	Truckee North Tahoe Transportation Management Association	Association	3.20.17	Enhanced Discussion of Neighboring Connections, I-80 Corridor, Partnerships, Water Taxi, Funding	4.11.17
50	United States Forest Service	Federal Government	3.16.17	Performance Measure Targets, Addition of Data, Single Track Trails, Vision	3.30.17
51	Washoe Tribe of Nevada and California	Sovereign Government	3.27.17	Additional Description of Washoe Tribe, Update to Cultural Section of IEC	4.11.17

Hi Barbara:

I am assuming you are referencing the [Draft 2017 Regional Transportation Plan](#). That is the plan that is released for public comment right now. The 2016 Active Transportation Plan was adopted last year and can be found [here](#).

The project you are referencing is a NDOT led project. You can find more information on our EIP Tracker, [here](#). I believe preliminary planning for this project is underway, and my understanding is it's their hope to deliver a project by 2022. NDOT will be able to provide you more information.

Please let me know if I can help further.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: barbara sourikoff [<mailto:bsouriko@yahoo.com>]
Sent: Monday, March 06, 2017 9:12 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Transportation Plan Draft

Hi Morgan,

As I review the Active Transportation Plan draft I see nothing concrete for the area of Round Hill Pines to Glenbrook as to

Corridor Revitalization/Complete Streets actions.

As I see it, Planning/Design for this area is slated for 2020 and implementation of any action to begin 2022.

Is this correct?

Thank you,
Barbara Sourikoff

Hi Mr. Barnett:

Thank you for your comment on the Draft 2017 Regional Transportation Plan.

The plan outlines strategies, projects, and programs that seek to better manage congestion. Adaptive Roadway Management, which is operating a roadway in a non-typical way (such as transit priority lanes, or holding traffic to allow a bus to pass) is discussed most in depth in Chapter 3, pages 3-12 and 3-36.

There is also a project on the unconstrained project list (meaning that we do not at this time see foreseeable revenue sources to deliver the project) called "Adaptive Traffic Management on SR 89 and SR 267" which includes these types of strategies. You can read more about this project here:

<https://eip.laketahoeinfo.org/Project/Summary/03.01.02.0100>

I would also recommend making contact with Placer County to discuss these ideas. Peter Kraatz is cc'd, and his email is: pkraatz@placer.ca.gov

Please let me know if you have any further questions.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: Barnett Family [<mailto:barnettfamily@comcast.net>]

Sent: Tuesday, February 28, 2017 8:45 AM

To: Morgan Beryl <mberyl@trpa.org>

Subject: Traffic impacts on HWY 89 due to travel to Squaw Valley

I am a resident and on local boards here in Squaw Valley. We have thought about a third lane on HWY 89 to accommodate buses only. Thinking more grandly we have thought about solutions similar to the Alps where there are tunnels and trains.

Are there any plans to address this problem in the regional planning process?

Thank you. Bob Barnett

Sent from my iPad

Hi Bob:

Thank you for your interest in the Draft 2017 Regional Transportation Plan. In a way these are the same projects, but they are also a bit different. Line item #6 in the Douglas County Plan is limited to a minimal roadway project that includes only re-striping. This could be a phase of the entire project. The project as it reads in the RTP / EIP Project Tracker is the most up-to-date information on expected improvements along the corridor. This is the full suite of improvements all bundled together.

Often, projects are delivered in phases. We are working closely with NDOT as they develop this project and I will have more information soon. I know they plan on coming out to the public for feedback.

Please consider this response as responding to both your emails and your phone call. Please feel to give me a ring if you would like to discuss further.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Bob Hodson [<mailto:hodsonbob@earthlink.net>]
Sent: Tuesday, March 14, 2017 10:02 AM
To: mnussbaumer@dot.state.nv.us; Morgan Beryl <mberyl@trpa.org>
Subject: Project 03.01.02.0108 - US 50 Safety Improvement and Complete Streets

Matt/Morgan,

The subject project on the 2017 Draft Regional Transportation Plan appears to be a replacement of Line Item #6 on Page 23 of the Douglas County Five Year Transportation Plan (<http://www.douglascountynv.gov/DocumentCenter/View/5639>).

Am I correct?

Bob Hodson
hodsonbob@earthlink.net
805-208-4334

Hi Bob,

Thank you very much for your thorough read and comments on the draft 2017 Regional Transportation Plan. We very much appreciate your support on the many strategies we lay out in the plan, specifically:

1. Increasing broadband and improving cellular and internet access: We are working closely with the TPC and our implementation partners on this issue. We've included the Dig Once policy in the Plan to help continue progress in this arena.
2. Reliable bus schedules: Both TART and TTD have been working on technologies that tell users where the bus is so they have a sense as to its arrival. Check out these two links:
<http://schedules.goswift.ly/ttd-schedule/> and http://www.nextbus.com/#!/tahoe/90/90_0_var0/2185
3. Free Transit service: We're working closely with TTD and TART to make this a reality in the near term.
4. 30 minute transit service a good interim step with 15 minute service as a goal: We'll start seeing 30 minute service very soon on TART routes and TTD routes within the next year. We agree 15 minute service would be optimal on highly used routes. Moving towards a 15 minute service on select routes is part of the plan, however at this time we are not confident we can fund that type of service. Additionally, we and our partners feel it prudent to move to 30 minute service first to ensure we are offering frequency in the correct areas and to build up use so that when 15 minute service is introduced it is well utilized.
5. Recreational amenities on inter-regional bus service: This is something we'll continue to work on with our partners.
6. Increased, more frequent, and express AMTRAK service: This is something we'll continue to work on with our partners.

Thank you,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]
Sent: Wednesday, March 22, 2017 11:04 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Bob Zimmerman <bobzim1934@att.net>
Subject: [your-subject]

Message Body:

We are permanent residents on the West Shore, I work at Homewood in the winter, and we are active outdoor recreation users/travelers. I think this is an excellent plan with many good elements that address the many transportation challenges facing the region. We have been to many different mountain resorts in the US and Europe and have found the public transportation to be much better, more reliable, and free in comparison to our current system. I've also lived in Switzerland, where public transportation is superb. It can be done. Some specific thoughts:

1. We definitely need higher quality wireless access for cell phones - there are many dead zones around the lake. The TPC is working on this, as mentioned, however our HOA has recently tried to get a grant through the CA CPUC and did not succeed. Solutions to these problems may not be easy. Requires cooperation with the state in this case, at least funding is supposed to be available through the CPUC - the realities may be different.
2. Reliable bus schedules are critical. People want to know when the bus is coming and when it will get them to their destination. Homewood EEs, as one example, quickly give up on the bus after being late for work several times. Bus drivers seem to just drive irrespective of the schedules - people never know if the bus has already come early or is running late - there is zero reliability from their perspective.
3. Bus service needs to be free or at least paying for it has to be simple. For example, one cannot even purchase a bus ticket at the TC Transit Center (at least last time I was there it wasn't obvious and I gave up trying to figure it out). Visitors need simplicity = free.
4. I agree with the proposed scheduling improvements; hourly is not attractive, 30 mins would be better if it was reliable. Good goal of 15 mins.
5. Recreational equipment like bikes need to be easily accommodated. Probably dogs also as mentioned.
6. Park/Ride needs buses that can handle significant baggage needs; outdoor equipment, large suitcases for long-term visitors, pets. These were all mentioned and successful examples were used (Bustang), I support all that and think those accommodations are critical to get people to use them.
7. The funding challenges are well-described. As noted, the most likely to succeed methods cannot significantly impact the local residents; too many are already making minimum wage and struggling to make ends meet. The Park City example was a good one in my opinion.
8. Regional Rail: the major problem with the existing AMTRAK service is the absence of express trains from major hubs. Driving is simply faster, by a significant factor. Express service direct to Truckee from the Bay Area, Sacramento, etc needs to be put in place or people won't take the train. Sure its beautiful, but its a whole day from Bay right now. Zero incentive to take the train at this point with all the stops. This is an AMTRAK-wide problem, may not be readily addressed, but essential if the train is going to compete with private cars.

Sincerely, Bob

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This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)

Hi Brad:

Thank you for your comment on the Active Transportation Plan and the draft 2017 Regional Transportation Plan.

For clarification, the reference you make to page 2-7 in the Active Transportation Plan is noting what *would* make a strong multi-modal system – essentially offering guidance for Tahoe transit operators on how they can improve their services to be more multi-modal.

Federal and state laws prohibit more than 2 or 3 bike racks on buses depending on the size of the bus. However, that does not mean there are no other solutions, as you suggest. I know that TTD has been working on possibly using bike trailers. It's helpful to know which routes you think it would be best utilized on. I've cc'd George Fink so he sees your ideas and can follow up with you on how TTD intends to increase bicycle carry capacity on their buses.

Thanks again for your comments,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Brad [<mailto:bradshelton@gmail.com>]
Sent: Thursday, March 23, 2017 4:26 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Comments on the Draft 2017 Regional Transportation Plan

I am a cyclist who visits Tahoe many times a year with my family and friends (headed up tomorrow actually!) to take in the beauty that Tahoe provides. Frequently these trips are focused on mountain biking, while other times we ride the paved trail network and designated routes through town. The current Active Transportation Plan contains many great improvements for cyclists, including bike paths and lanes on many dangerous and much-needed stretches of road, and I support those improvements!

However, I would like to call attention to one important improvement on page 2-7 of the Active Transportation Plan: "Buses have sufficient bicycle carrying capacity."

Right now, it is my understanding that Tahoe buses carry either two or three bicycles on a front-mounted rack, which means somewhere between two bicycles per hour (on the 23 bus) and six bicycles per hour (on the 50 bus). This seems like an extremely low number based on the amount of cyclists I encounter in Tahoe.

As a mountain biker, being able to use 23 bus to access the Tahoe Rim Trail without running a car shuttle would be a great benefit to the environment.

As recreational cyclists, my family and I would like to use the 50 bus to access the Y, Nevada and Round Hill beaches and bike paths, Pope and Baldwin beaches and bike paths, and Fallen Leaf and Angora Lakes without having to ride dangerously busy streets with incomplete bike paths all the way through town.

In general, I would love to be able to park my car once I arrive, and use a combination of bicycles and city buses to recreate. Locking expensive bikes to racks to be left at a bus stop is not a preferable alternative do to theft and the inability to travel again once leaving the bus at our stop.

Accordingly, *I strongly encourage you to make greater bicycle capacity on TTD buses - specifically the 23 and 50 buses - a major priority.* I am told that bike rack trailers are the most realistic way to do this - but I support whatever increases bicycle capacity on Tahoe buses.

Thank you,
Brad Shelton
5700 Beech Ave
Orangevale, CA



Mail

PO Box 5310
Stateline, NV 89449-5310

Location

128 Market Street
Stateline, NV 89449

Contact

Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 10, 2017
TO: Eric Fredericks, California Department of Transportation, District 3
FROM: TRPA Staff
RE: Response to California Department of Transportation, District 3 Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Mr. Fredericks:

Thank you for California Department of Transportation (Caltrans), District 3 comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). TRPA appreciates Caltrans' recognition of the many laudable aspects of the plan. We have responded to Caltrans' comments and recommendations below, and have included the updated text within the final 2017 Regional Transportation Plan / Sustainable Communities Strategy.

Recommendations: RTP-SCS Checklist

1. Pursuant to 23 CFR 450.324(f)(10), the RTP shall, at a minimum include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the 2017 RTP. The discussion may focus on policies, programs, or strategies, rather than at the project level. The Metropolitan Planning Organization (MPO) shall develop the discussion in consultation with applicable Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation. The RTP Checklist refers to the environmental document for this information; however, the discussion of types of potential environmental mitigation activities is required in the body of the RTP.

Text has been added to page 2-21 and reads:

"Identified Environmental Mitigation

TRPA identified some impacts in the 2017 RTP/SCS environmental document, primarily related to construction of new development and impacts of new development on travel delays. Project level mitigation will be implemented through TRPA's best construction practices, while Region-wide impacts would be addressed by implementation of non-motorized improvements to reduce congestion, roadway system management requirements as well as programs to monitor traffic conditions through established performance measures."

2. Pursuant to 23 CFR 450.324(g), the RTP should include a comparison to the CA State Wildlife Action Plan. It is understandable that the local and regional wildlife protection measures are more comprehensive than the CA State Wildlife Action Plan but some discussion and/or comparison to the State Wildlife Action Plan would be appropriate in the body of the RTP for this section.

Text has been added on page 2-20 and reads: "TRPA circulated the 2017 RTP/SCS and environmental analysis to the California Department of Fish and Wildlife, the responsible agency for implementation of the State Wildlife Action Plan. The Lake Tahoe Region falls within the Sierra Nevada Conservation Unit as identified in the State Wildlife Action Plan. Because site specific design and locations have not been identified for projects included in the 2017 RTP/SCS, the presence of the focal species listed in the 2017 RTP/SCS is not known. However, agencies that are permitting individual projects would be required to consult with California Fish and Wildlife to ensure site design would avoid or mitigate any impacts to sensitive species, including those listed in the State Wildlife Action Plan.

The State Wildlife Action plan identifies key pressures on conservation targets in the Sierra Nevada. These include climate change; fire and fire suppression; housing and urban areas; invasive plants and animals; livestock, farming and ranching; recreational activities; renewable energy; and roads and railroads. The 2017 RTP/SCS include transportation policies, programs and projects to reduce reliance on the automobile, increase efficiency of the transportation system, and the use of alternative fuel which will reduce greenhouse gas emission. Road and recreation projects contained in the plan will include storm water retention and filtration improvements to protection to the Region's waterbodies. All projects would be required to comply with TRPA's best management practices for construction that include management of invasive species. Implementation of the plan will ultimately result in improved environmental conditions in the Region and would not interfere with land conservation strategies contained in the State Wildlife Action Plan."

3. Pursuant to 23 CFR 450.306(h), some discussion on how the RTP is coordinated and consistent with the Public Transit – Human Services Transportation Plan would be appropriate. Currently, it is simply written as a citation on a list of sources.

Text has been updated to read: "Short-range transit plans and Coordinated Human Services Transportation Plan outline routes, centers, and services of the existing system; analyze trends such as ridership, revenue, and unmet customer needs; and recommend five-year system upgrades."

Recommendations: Chapter 1 – Regional and Key Concepts

1. Transforming Tahoe Transportation (page 1-2): This section mentions reducing the reliance on the "private automobile," and emphasizes the importance of making roadways more bikable and walkable, but does not discuss transit. Including transit, in this section, as an important component in implementing sustainable transportation within the Tahoe Basin may improve this section.

Text has been updated to read: “The 2012 Regional Transportation Plan addressed transportation system needs in the Region’s small community centers, emphasizing the planning and delivery of bikeable, walkable communities, and connections to transit through complete streets.”

2. The Long-Term Vision (page 1-3): Since the use of "real time" data is mentioned as a means to alleviate congestion and travel time, it might be beneficial to also mention the use of Intelligent Transportation Systems as a tool to help in this effort.

Text has been updated to read: “The answer will provide real time options through intelligent transportation systems including congestion and travel time, the cost differential between parking a car versus cost of transit; availability of parking near the destination;

3. Key Concept #1: Regional Goals (pages 1–11): This section provides a great opportunity to discuss how the goals of the Plan align with the goals set forth in the California Transportation Plan (CTP).

Text has been updated to read: “These goals reflect the requirements of the TRPA Bi-State Compact, federal and state transportation planning requirements and plans such as the California Transportation Plan, and public input.”

Recommendations: Chapter 2 —Planning Context

1. Supporting Plans (page 2-4): This section provide further opportunity to illustrate how goals of the Plan align with the goals set forth in the California Transportation Plan (CTP).

Text has been updated to read: “TRPA not only carries out the goals and policies of state and regional plans, directs funding to projects that help meet regional goals assessed through performance measures, but also convenes a diversity of partners to address various challenges facing the Region.

2. Partners Roles and Responsibilities (page 2–6): The local tribal government may want to be mentioned in more detail in this section. It would be great to discuss the tribal outreach and what roles and responsibilities the tribal government may have had during the development of the draft Plan.

New text was added and reads:

“Washoe Tribe of California and Nevada:

The Washoe Tribe of Nevada and California is an important partner in transportation planning at Lake Tahoe, as Lake Tahoe is the traditional center of the Washoe world. The tribe owns and manages land in the Region, such as Meeks Bay Resort and Marina and Cave Rock on the East Shore of the lake that serves as a transportation gateway into Lake Tahoe. The Washoe are the original inhabitants of the Lake Tahoe Region. Transportation planning staff meet one-on-one with the Washoe Tribe to share information and updates on transportation projects and issues. Tribal staff actively participated on the project development team for the Corridor Connection

Plan and the 2017 Regional Transportation Plan. The Tribe also serves on project development teams for specific projects, such as the Nevada Stateline to Stateline Bikeway. The Tribe is a voting member of the Tahoe Transportation Commission (TTC) and the Advisory Planning Commission (APC), which are the advisory bodies to TRPA/TMPO. Regular communication between the Tribe and TRPA serve as another method for both parties to discuss any other issues that may arise through formal consultation.”

Recommendations: Chapter 3 —The Plan

1. Chapter 3 should provide some general discussion in acknowledgement of the contribution Lake Tahoe Airport (Airport) provides to the City of South Lake Tahoe, and the Tahoe Basin. The discussion should include a short description of the Airport's role in the overall quality of life, economic benefit, and emergency infrastructure within the Tahoe region.
 - Aviation (page 3-32): In the last sentence, the Plan states a projected 19.9% increase in flights to the Airport through 2023. There are significant gains that this increase will bring to the Basin. Please add a brief discussion regarding the value the general aviation Airport brings to the Tahoe Basin.

Text has been added to page 3-31: “The South Lake Tahoe Airport benefits the Region economically through transport of goods and supports public health through emergency infrastructure.”

- Transportation Security (pages 3-33 –3-34): The Airport provides vital emergency services in the Tahoe Basin such as air ambulance, law enforcement, firefighting services, as well as an emergency access point (ingress/egress) during road closures, however not mentioned in this section. Please add a brief discussion of the above-mentioned capabilities the Airport provides in the Tahoe region.

Text has been added on page 3-33 to read: “The South Lake Tahoe Airport is a vital emergency service center that provides services such as air ambulance and firefighting amenities.”

- Transportation System Management (page 3-37): The Airport is located in a small meadow beneath adjacent State Highway System elevation. As TRPA develops the transportation system management program, improved signage and signalization which alerts travelers of, and provides further awareness of the nearby Airport access, will enhance safety at the Airport access intersections.

Thank you for this comment. The City of South Lake Tahoe recently updated their Airport Master Plan which should include these types of amenities.

Recommendations: Chapter 4 –Funding the Plan

1. The Airport receives State and Federal funds which must be used to implement Airport improvements. Chapter 4 should provide some general discussion regarding Airport

funding as the State and Federal contributions inevitably and positively contribute to the region's economy and employment.

Text has been updated on page 4-4 to read: "Major federal funding sources include the Surface Transportation Block Grant Program, Congestion Mitigation & Air Quality Program, the Federal Lands Access Program, Federal Transit Administration grants, Federal Aviation Administration Airport Improvement Program, and others."

Recommendations: Appendix B

1. Technology and Transportation System Management (page 4): Regarding EIP #.03.01.02.0076 (Sierra Nevada Operation System), the project is shown as a Caltrans project, however the EIP reflects ElDorado County as the lead implementer, please revise accordingly.

Thank you for this comment. The EIP project tracker is being revised accordingly.

1. Corridor Revitalization (page 2): Regarding EIP #.01.01.02.0019 (US 50 Water Quality Improvement Project- Wildwood to Stateline) is unfamiliar to Caltrans, and does not show-up in any of the District's plans to implement. Please revise accordingly.

Thank you for this comment. This project has been removed from Appendix B completely. The EIP project tracker is being revised accordingly. We look forward to collaborating with Caltrans on the U.S Highway 50 Community Revitalization Project, which also address water quality upgrades in this area. This is currently the only section of U.S. Highway 50 that does not have water quality improvements.

TRPA appreciates Caltran's comments on the draft 2017 Regional Transportation Plan and looks forward to our continued collaboration. Once the plan is approved, we will supply Caltran's with the appropriate number of printed copies. If you have any questions that you would like to discuss regarding our responses, please let me know.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

DEPARTMENT OF TRANSPORTATION

DISTRICT 3 – SACRAMENTO AREA OFFICE
2379 GATEWAY OAKS DRIVE, STE 150 – MS 19
SACRAMENTO, CA 95833
PHONE (916) 274-0635
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TTY 711



*Serious drought.
Help save water!*

March 20, 2017

03-PLA2017-00052
2017022055

Ms. Morgan Beryl
Tahoe Regional Planning Agency (TRPA)
P. O. Box #5310
Stateline, NV 89448

Draft Linking Tahoe: 2017 Regional Transportation Plan / Sustainable Communities Strategy (RTP-SCS) – Plan / Mitigated Negative Declaration (MND)

Dear Ms. Beryl:

Thank you for including the California Department of Transportation (Caltrans) in the MND public review process for the project referenced above. Caltrans' new mission, vision, and goals signal a modernization of our approach to California's transportation system. We review this local and regional development for impacts to the State Highway System (SHS) in keeping with our mission, vision and goals for sustainability/livability/economy, and safety/health. We provide these comments consistent with the State's smart mobility goals that support a vibrant economy, and build communities, not sprawl.

The proposed project identifies programs, projects, and funding that will continue forming the Lake Tahoe Region's transportation network for the next 20 years. The Plan, MND, and Appendices collectively focus on pedestrian, bicycle, transit, and technological transportation network improvements that will improve the region's economy, multi-modal safety, and reduce the Lake's pollutant intake while minimizing impacts to the global climate. The following comments are based on the draft March 2017 Plan, MND, and Appendices.

Commendations

Caltrans applauds TRPA for:

- Thorough RTP-SCS development which included Caltrans District staff over the course of the entire process;
- Developing a 2017 Regional Transportation Plan that is very clear, interesting to read, well supported with a documented public involvement process, and rich with graphics and

"Provide a safe, sustainable, integrated, and efficient, transportation system to enhance California's economy and livability"

illustrations which provide the public a great deal of understanding for how transportation planning and funding function at all levels of government, including stated issues, goals, and policies within the Tahoe Basin;

- Achieving a lot of great progress since the 2012 RTP, as noted throughout the document;
- Defining the complex Lake Tahoe Travel Behavior Pattern Focus Areas as an effective communication tool for the general public to understand the unique region and how investments are selected;
- Addressing safety in the Lake Tahoe Safety Plan as traffic fatalities and serious injuries are of utmost concern with recent data showing an upward trend in traffic crashes (2015 Strategic Highway Safety Plan);
- Including goods/truck movement needs as a consideration in project design as it is critical for a vibrant economy and safety of all users;
- Incorporating performance measures, monitoring and reporting well ahead of the federal timeline and also recognizing the future coordination efforts with California and Nevada in the ongoing target setting process; and
- Effectively summarizing (Chapter 6) the actions for implementing the RTP from 2017-21.
- The discussion on the effectiveness of state revenues as it relates to the gas tax is very informative and helps explain some of the funding challenges TRPA is faced with as they seek to implement projects from this plan.

RTP-SCS Checklist

- Pursuant to 23 CFR 450.324(f)(10), the RTP shall, at a minimum include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the 2017 RTP. The discussion may focus on policies, programs, or strategies, rather than at the project level. The Metropolitan Planning Organization (MPO) shall develop the discussion in consultation with applicable Federal, State, and Tribal land management, wildlife, and regulatory agencies. The MPO may establish reasonable timeframes for performing this consultation. The RTP Checklist refers to the environmental document for this information; however, the discussion of types of potential environmental mitigation activities is required in the body of the RTP.

- Pursuant to 23 CFR 450.324(g), the RTP should include a comparison to the CA State Wildlife Action Plan. It is understandable that the local and regional wildlife protection measures are more comprehensive than the CA State Wildlife Action Plan but some discussion and/or comparison to the State Wildlife Action Plan would be appropriate in the body of the RTP for this section.
- Pursuant to 23 CFR 450.306(h), some discussion on how the RTP is coordinated and consistent with the Public Transit – Human Services Transportation Plan would be appropriate. Currently, it is simply written as a citation on a list of sources.

Chapter 1 – Regional and Key Concepts

Transforming Tahoe Transportation (page 1-2)

- This section mentions reducing the reliance on the “private automobile,” and emphasizes the importance of making roadways more bikable and walkable, but does not discuss transit. Including transit, in this section, as an important component in implementing sustainable transportation within the Tahoe Basin may improve this section.

The Long-Term Vision (page 1–3)

- Since the use of “real time” data is mentioned as a means to alleviate congestion and travel time, it might be beneficial to also mention the use of Intelligent Transportation Systems as a tool to help in this effort.

Key Concept #1: Regional Goals (pages 1–11)

- This section provides a great opportunity to discuss how the goals of the Plan align with the goals set forth in the California Transportation Plan (CTP).

Chapter 2 – Planning Context

Supporting Plans (page 2–4)

- This section provides further opportunity to illustrate how goals of the Plan align with the goals set forth in the California Transportation Plan (CTP).

Partners Roles and Responsibilities (page 2–6)

- The local tribal government may want to be mentioned in more detail in this section. It would be great to discuss the tribal outreach and what roles and responsibilities the tribal government may have had during the development of the draft Plan.

Chapter 3 – The Plan

Chapter 3 should provide some general discussion in acknowledgement of the contribution Lake Tahoe Airport (Airport) provides to the City of South Lake Tahoe, and the Tahoe Basin. The discussion should include a short description of the Airport's role in the overall quality of life, economic benefit, and emergency infrastructure within the Tahoe region.

Aviation (page 3-32)

- In the last sentence, the Plan states a projected 19.9% increase in flights to the Airport through 2023. There are significant gains that this increase will bring to the Basin. Please add a brief discussion regarding the value the general aviation Airport brings to the Tahoe Basin.

Transportation Security (pages 3-33 – 3-34)

- The Airport provides vital emergency services in the Tahoe Basin such as air ambulance, law enforcement, firefighting services, as well as an emergency access point (ingress/egress) during road closures, however not mentioned in this section. Please add a brief discussion of the above-mentioned capabilities the Airport provides in the Tahoe region.

Transportation System Management (page 3-37)

- The Airport is located in a small meadow beneath adjacent State Highway System elevation. As TRPA develops the transportation system management program, improved signage and signalization which alerts travelers of, and provides further awareness of the nearby Airport access, will enhance safety at the Airport access intersections.

Chapter 4 – Funding the Plan

The Airport receives State and Federal funds which must be used to implement Airport improvements. Chapter 4 should provide some general discussion regarding Airport funding as the State and Federal contributions inevitably and positively contribute to the region's economy and employment

Appendix B

Technology and Transportation System Management (page 4)

- Regarding EIP #.03.01.02.0076 (Sierra Nevada Operation System), the project is shown as a Caltrans project, however the EIP reflects El Dorado County as the lead implementer, please revise accordingly.

Corridor Revitalization (page 2)

- Regarding EIP #.01.01.02.0019 (US 50 Water Quality Improvement Project - Wildwood to Stateline) is unfamiliar to Caltrans, and does not show-up in any of the District's plans to implement. Please revise accordingly.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to the RTP.

If you have any questions regarding these comments or require additional information, please contact Arthur Murray by email at: arthur.murray@dot.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Fredericks", is written over the word "for".

for
ERIC FREDERICKS, Chief
Office of Transportation Planning – South Branch

c: Scott Morgan, State Clearinghouse

Hi Dirk:

Thank you for your comments on the draft 2017 Regional Transportation Plan. We very much appreciate our neighboring regions reviewing the plan to ensure we have accurate information and to strengthen our collaboration efforts. Please see my responses below **in red**.

Please feel free to get in touch if you would like to discuss further.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Dirk Goering [<mailto:DGoering@carson.org>]
Sent: Wednesday, March 22, 2017 3:38 PM
To: Morgan Beryl <mberyl@trpa.org>
Cc: Graham Dollarhide <GDollarhide@carson.org>
Subject: Comments on the RTP from CAMPO

Hi Morgan,

Sorry for comments so close to the deadline. Overall the plan is very good, just a few small comments:

- Page ii – Shelly Aldean is not on the Carson City Board of Supervisors, maybe just put Carson City Representative

Thank you for this edit. We updated to Carson City Representative.

- Please replace Patrick's name with Graham Dollarhide, he is our transit coordinator and has reviewed the document from that perspective

Thank you for this edit. We updated.

- Page 1-16, it would be interesting to see percentages by arrows

Thank you for this request. We'll consider updating the Figure. Additionally, when the TTD led Corridor Connection Plan is released, much more detailed information on highway corridor use will be shown. This map is a high-level conceptual map illustrating the concepts of travel behavior.

- Some more discussion on Route 21x is believed to be beneficial. Possibly even listing it as an unfunded project. The ridership is mentioned in the report on page 1-23 and is a fair ridership number

Thank you for this edit. I've added the following onto pg. 1-23: " In the past TTD has operated a commuter bus between the Stateline area and Carson City when funds are available. This is an important connection for commuters from Carson City to Lake Tahoe."

Thanks for the opportunity to comment.

Dirk

Dirk Goering, AICP
Senior Transportation Planner
[Carson City Public Works Department/](#)
[Carson Area Metropolitan Planning Organization](#)
[3505 Butti Way](#)
[Carson City, NV 89701](#)
Ph: 775-283-7431
Fx: 775-887-2112



Mail
PO Box 5310
Stateline, NV 89449-5310

Location
128 Market Street
Stateline, NV 89449

Contact
Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 11, 2017
TO: Gavin Feiger, Community Mobility Group
FROM: TRPA Staff
RE: Response to Community Mobility Group Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Mr. Feiger:

Thank you for Community Mobility Group's (CM) comments and letter of support on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate the efforts the CM group provides for the Safe Routes to School program and promoting and participating in planning activities to enhance active transportation safety and access. We have responded to the CM group's comments and recommendations below.

1. Recommendation: Support Active Transportation Infrastructure and reconsider light at Lodi Avenue for project 01.01.02.003: U.S. Highway 50 Water Quality Improvement Project - "Y" to Trout Creek:

Thank you for this recommendation. TRPA is working closely with FHWA, the City of South Lake Tahoe, and Caltrans to perform a Road Safety Audit that will look at bicycle and pedestrian improvements that can be made to the existing project or plans for future projects. The light at Lodi Avenue at this time is not being reconsidered by Caltrans.

2. Recommendation: Please move project number 03.01.02.005: Al Tahoe Safety and Mobility Enhancement Project from "Active Transportation" category to "Corridor Revitalization".

Thank you for this recommendation. As requested, this project has been moved to the Corridor Revitalization section of the constrained project list.

3. Recommendation: Appendix A: Goals and Policies. Consider adding a policy such as "Prioritize transit-tracking technology to accurately inform the user of transit arrival times and delays."

Thank you for this recommendation. We believe this recommendation is already addressed by many existing policies located in Appendix A that encourage the use of technology to provide real-time information to travelers. Policies include 4.1, 4.3, and 4.5.

TRPA appreciates the CM groups' comments, partnership, and support for the 2017 Regional Transportation Plan and looks forward to our continued partnership.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

March 23, 2017

Ms. Morgan Beryl
Senior Transportation Planner, Tahoe Regional Planning Agency
PO Box 5310, Stateline, NV 89448
Transmitted via email: mberyl@trpa.org



Re: Comments on the Draft Linking Tahoe - 2017 Regional Transportation Plan

Dear Morgan,

On behalf of the Community Mobility Work Group of the Lake Tahoe Sustainability Collaborative, we are writing to express our thanks to you and your staff colleagues for the thorough and thoughtful Draft 2017 Regional Transportation Plan (RTP) and accompanying environmental documentation. We commend the efforts you invested into meaningful public outreach, stakeholder engagement, and research. Your dedication to producing a comprehensive and forward-looking RTP was evident to us as we reviewed the document.

The progressive bicycle and pedestrian goals and policies in Linking Tahoe reflect the need our residents and visitors have for additional convenient and safe mobility options that incorporate the protection of lake clarity and the reduction of air pollution from automobile traffic and congestion. They support the long-term economic well-being of our communities and healthier life styles for those who live, work, visit and recreate at Lake Tahoe. We see this RTP as prioritizing opportunities for Tahoe's project implementers to expand our trails, sidewalks, transit, and other non-auto mobility options. We support the new, increased focus on improving connections to recreation areas and it is a high priority for our Mobility group as well. Accordingly, we strongly support RTP adoption by the TRPA Governing Board, scheduled for April 26.

The Lake Tahoe Sustainability Collaborative was established in May of 2012 and includes over 120 volunteers living, working, and recreating in the Tahoe-Truckee region. Our mission is to sustain a citizen-based effort to accelerate a shift toward a healthier Tahoe-Truckee community, environment, and economy. The Community Mobility Workgroup is comprised of over 30 residents and representatives of organizations, jurisdictions, and agencies working together to improve bicycle and pedestrian safety, accessibility, and mobility. We regularly work with TRPA along with other local jurisdictions and agencies, and look forward to continuing this collaboration as we move collectivity into the future.

As part of our support, we would like to provide specific feedback on the following projects identified in the Constrained Project List in Appendix B:

1. *01.01.02.003: U.S. Highway 50 Water Quality Improvement Project - "Y" to Trout Creek.* We strongly encourage TRPA to continue to work with the City of South Lake Tahoe and Caltrans, and use TRPA's permitting authority, to ensure that as much room is provided as possible for Class II bike lanes and consistent-width sidewalks, that a safe crossing of Highway 50 is provided in the vicinity of Grocery Outlet, and that the warrant for the traffic light at the intersection of Highway 50 and Lodi is reconsidered.
2. *03.01.02.005: Al Tahoe Safety and Mobility Enhancement Project.* Please move this from "Active Transportation" category to "Corridor Revitalization". This project is fully funded by the California State Active Transportation Program, but is truly a corridor revitalization project. It was selected as the priority project from the South Tahoe Middle School Connectivity Plan and the Lake Tahoe Unified School District Safe Routes to School Master Plan and, because of its multiple connectivity benefits, may be the most important connectivity project in South Lake Tahoe in our immediate future.

We would like to particularly commend you on the Goals and Policies contained in Appendix A, which we believe meet goals and match priorities of numerous other plans in the Tahoe Region. We would like to see a transit policy to the effect of "Prioritize transit-tracking technology to accurately inform the user of transit arrival times and delays."

Thank you again for the opportunity to comment and for your work to develop a positive and useful plan for our communities and the greater Lake Tahoe region.

Sincerely,

Three handwritten signatures are displayed in a row. From left to right: Steve Teshara, Gavin Feiger, and Rebecca Bryson. The signatures are in black ink and are cursive.

Gavin Feiger, Steve Teshara, and Rebecca Bryson
Chairs of the Community Mobility group

Contact: gavin.feiger@gmail.com | c: 206.755.8195

CC:

Nick Haven, TRPA

Hi Dana:

Thank you for your comments on the draft 2017 Regional Transportation Plan.

Support for Transit: You are on the right track with utilizing smaller transit buses that use electric or natural gas as fuel options. We are already seeing both transit operators using new technologies as well as smaller buses for lower use routes. Additionally, public private partnerships are very important this realm for recreation based shuttles the serve ski areas etc.

Questions on the Crosslake Ferry: TRPA and partners believe that a crosslake ferry will greatly reduce vehicle trips both by reducing “round the lake” sightseeing as well as commuter travel. Additionally, a crosslake ferry will increase awareness of water taxi services. This project is still in the preliminary phases. The Tahoe Transportation District is the lead on that project. You can learn more, including contact information and how to get involved in the public process on the EIP Project Tracker here: <https://eip.laketahoeinfo.org/Project/Summary/03.01.02.0021>

Question on Airport: We discuss the relevance of airport travel in Chapter 3, under Transportation Systems Management. The City of South Lake Tahoe manages their airport and just finished their master plan. You can learn more about that here: <http://www.cityofslt.us/index.aspx?nid=731>

Question on Nightrider service: TART has seen a lot of success with the Nightrider service and is expanding offerings in that area. If you are interested in learning more, check out this website: <http://www.laketahoetransit.com/>

Thanks again for your input on the draft 2017 Regional Transportation Plan.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Dana [<mailto:danamare@aol.com>]
Sent: Friday, March 24, 2017 2:30 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Transportation comments

My comments for the future of transportation are that the buses should be smaller, more efficient or hybrids, and run more often for a nominal fee. The ferry system is only for sightseers, not commuters, so allow a private firm to do that sort of thing for profit by reservation. Everyday we saw the Northshore 'ferry'

go by with no one on it . Visitors like a car because they can choose where to go, Emerald Bay, a hiking trailhead, the grocery store, so prying them out of their Reno rental car will be a challenge. Where is the airport transportation to Tahoe in your plan ? Will people leave there rental unit by foot to take a bus down on the highway ? Are all these developement 'projects' required to provide group transportation for their guests ? No one rode the Nightrider. Perhaps Tahoe is maxed out and soon we will be full of smog. Perhaps the answer is stop actively building large projects and concentrate on dealing with what is happening now, manage what is here now..Dana Spencer

danamare@aol.com

Hi David:

Thank you for your comment. TRPA shares your desire and goal to preserve the environment and residential quality of life.

Have a nice weekend,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: David Briscoe [<mailto:tahoe0116@gmail.com>]

Sent: Wednesday, February 22, 2017 3:11 PM

To: Morgan Beryl <mberyl@trpa.org>

Subject: Tahoe Transportation Plan and related endeavors.

Please add my comment to the record.

My one comment, from having seen this go on for years and years, both at Tahoe and elsewhere, is that these "improvements" are fine in and of themselves, but they are ALWAYS used to either attract more usage, in already overused areas, and thus require more development to satisfy that use. A great plan for developers, realtors, and anyone else who cares more for profit than the beauty of an area, but a disaster for the environment and future generations. Even the current generation or the TRPA itself, has no idea of what has been already lost.

Thank you

David Briscoe
592 Lariat Circle
Incline Village, NV 89451
775-832-2282

Sent from the Eighth Dimension

Thanks again for your input. We appreciate your ideas and will include them in our public comment record.

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Squaw Llywood [<mailto:squawllywood@gmail.com>]
Sent: Friday, February 24, 2017 9:58 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Re: Tahoe Transportation Issues

Thank you for your reply Morgan, I am very familiar with the issues. I have lived here since 1985, I am a pilot and aircraft owner.

My point being is that perhaps it's time for TRPA to consider getting behind the concept of increasing utilization of the airport as opposed to the flow of traffic coming in and out of the basin over 50. Just food for thought.

Have a wonderful weekend!

On Fri, Feb 24, 2017 at 8:57 AM, Morgan Beryl <mberyl@trpa.org> wrote:

Dear Mr. Meyers,

Thank you for your interest in the Regional Transportation Plan and providing your comment. We share your sentiment that the South Tahoe Airport plays an important function at Lake Tahoe, from general aviation to emergency response capabilities, and TRPA supports the City's ongoing master plan process for the airport to make it a more viable aviation facility.

The master settlement agreement reached in the 1990s had more to do with mitigating noise and impacts of commercial service at the airport, not ending it. That may have impacted the financial viability of commercial service and the type and size of jets that could use the airport, however larger industry trends and the proximity of Reno and Sacramento airports also played a major role.

Commercial service at the airport was ended in 2001. South Lake Tahoe has looked at trying to bring back commercial service as part of its ongoing master plan process for the airport, and determined it is not economically viable at this time because of the amount of subsidies that would most likely be

required to bring in commercial passenger carriers. To learn more, check out their most recent report here: <http://www.cityofslt.us/index.aspx?nid=731>

Please feel free to get back in touch if you would like to discuss more.

Best,

Morgan Beryl
Senior Transportation Planner
[775-589-5208](tel:775-589-5208)
mberyl@trpa.org



From: Squaw Llywood [mailto:squawllywood@gmail.com]
Sent: Thursday, February 23, 2017 9:26 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Transportation Issues

Dear Ms. Beryl:

I am writing you in response to an article I read online in Lake Tahoe News. It is deeply disheartening to see the unintended consequences of TRPA's actions 25 years ago.

We once had a vibrant airport in Lake Tahoe. That airport was a valuable transportation hub, and a point of access to the basin from all around the world. Those who travel into the airport from out of the area reduce their carbon footprint locally by flying in versus driving in.

Over the past 25 years, Truckee's airport has seen increasing traffic volume, picking up the slack from those who were discouraged from flying into Lake Tahoe Airport. TRPA has NO say whatsoever over what happens in Truckee, and people tend to go to the point of least resistance.

That said, Lake Tahoe Airport isn't going anywhere. Millions of dollars have been invested in the airport over the past 10 years, including the construction of a new runway.

It would well serve the people of Lake Tahoe, the environment, and the traffic issues TRPA claims to desire to address to reconsider its position on the airport. Lake Tahoe Airport is nowhere close to capacity, and it will likely never get there. But the fact that TRPA has refused to concede their failure of the 1992 settlement agreement, which by the way has long since expired, is disturbing to say the least.

Think of the traffic mitigation if Tahoe had air service between Reno, Truckee & the Bay Area. There may not be an economic model for this, but to take cars off the road and shift those trips to a mode of transportation which is under utilized SHOULD be the objective of TRPA.

So the rhetorical question I post to you is simple - is this a political issue that undermines your ability as an agency to do what is right for the environment? From the outside looking in, it certainly appears that way.

Thank you for your consideration of my opinion.

Respectfully,

David Meyers

Hi Mr. Hale:

Thank you for your comment on the Draft 2017 Regional Transportation Plan. This plan lays out strategies, projects, and programs that seek to encourage the use of public transit, walking, and biking by residents, commuters, and visitors to reduce reliance on the private automobile and better manage congestion. Some example strategies include incentive and disincentive programs such as parking management systems, transit priority lanes, real-time information, and improved intersection functionality.

Lake Tahoe is an world-renowned recreation destination with a \$5 billion annual economy based on outdoor recreation and tourism. This plan focuses on providing transportation options that are frequent, free-to-the-user, and connected to recreation destinations from neighborhoods and town centers. Implementation of this plan will help to move more people more efficiently benefiting the environment, residential quality of life, and visitor quality of experience.

If you have any specific comments, recommendations, or questions on the strategies, projects or programs in this plan, please let me know.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: d-shale@sbcglobal.net [<mailto:d-shale@sbcglobal.net>]

Sent: Friday, February 24, 2017 2:34 PM

To: Morgan Beryl <mberyl@trpa.org>

Subject: Lake Tahoe Regional Plan

Dear Ms. Beryl,

I reside at 695 Fairway Drive, Tahoe City, CA. 96145. I have lived at this address since 1971

I am responding to the announcement on the internet regarding traffic issues associated with the Lake Tahoe Regional Plan

The announcement listed you as the contact person.

Please enter my comments as part of the public input portion of the process.

As conditions presently stand, lake Tahoe and the areas adjacent, such as Truckee, Alpine Meadows, Squaw Valley, Homewood< Incline Village, Tahoe City, Kings Beach and South shore are ill prepared to handle more traffic.

- The discussion keeps going on about more density for; housing, recreational facilities, and amenities associated with these types of use.
- The existing traffic gridlock is totally absurd during peak overloads of visitors to these areas.
- When it takes an hour to go approximately 4 miles on Highway 89 to Tahoe City on a clear day, something is dreadfully wrong.
- The same thing occurs in Tahoe City during times of traffic grid lock. The traffic then diverts from main roadways through adjacent quiet neighborhoods to beat the grid lock. No one seems to be very concerned about the impact on a neighborhood street impacted by: noise, speeders, sheer volume and rude commuters who are already angry about the congestion.
- When questions arise from the local residents, as to whom should respond to these traffic issues, it usually spins out that the agencies all pass the issues off onto another entity. One recurring response is that they do not have available funding. We all know how many agencies there are that have input, so the cycle is practically endless.
- Great amounts of private and public funds are expended to prepare reports/ that purportedly address these issues when in reality they do not. But think about this for a minute, if a report/study is prepared to evaluate a project, is it reasonable to believe that the document is going to say do not proceed? I am afraid the entity/consultant that prepared the document would be out of business in short order. Generally problem areas are addressed by suggesting mitigation which in many cases is simply a band aid. Finally a good number of the studies don't delve into the questions in enough depth and detail. They respond to the obvious symptoms and do enough give enough attention to collateral effects.
- A Placer County proposition to provide additional transportation funding through a sales tax was recently defeated. It was proposed because there is insufficient transportation money available to adequately maintain the existing facilities let alone build new ones. A point to consider is that the general public by their vote does not support appropriating more of their tax money to update and maintain existing transportation facilities by voting it down. So where is the money going to come from? The developers do not volunteer. In the mean time, the direction seems to be to continue toacerbate the deterioration of the environment.
- Adequate work force housing is essentially talked about, but little is done to address the total impact of this issue. One can only assume that the work force will have to commute, which further grid locks the system. The cost of living in or around the basin is highly prohibitive to average low income citizens.
- I have blathered enough but you asked for input so this is my point f view. I am certain that I am not alone. A lot of people just don't bother to express their concerns because they generally are not listened to. The silent majority is truly silent until abrupt and truly disruptive events cause their outcry. Creeping disruption is too subtle to be addressed because it is quiet and ever pervasive.

Don Hale

Hi Mr. Mann,

Thank you very much for your comment on the draft 2017 Regional Transportation Plan. We appreciate your support and are glad you and your friends are making use of the many trails Lake Tahoe has to offer.

We also understand the need for more frequent bus service, better connections with recreation destinations, and the ability to carry recreation equipment. I know the TTD and TART has been working to increase bike carry capacity onto their buses. I've cc'd George Fink who operates the South Tahoe transit service. He could possibly give you some details on what is in the works and which buses and routes are the most bike friendly.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Doug M. [<mailto:dougmann35@gmail.com>]
Sent: Thursday, March 23, 2017 9:59 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: 2017 Regional Transportation Plan Draft

Mr. Beryl,

I'm writing to you to thank you for all the cycling-related parts of the plan. My family and friends go to Tahoe, especially South Lake, as often as we can to ride the roads and trails in the area.

However, we would love to see buses have more bike access. Driving and figuring out shuttles is often the most difficult part of our trip. Please consider addressing this shortfall. Thanks!

Doug Mann

Hi Eric:

Thank you for your questions and comments on transportation at Lake Tahoe and the Draft 2017 Regional Transportation Plan.

You are correct - Data from around the world illustrates that adding more capacity through widening roadways actually induces people to drive. You cannot build your way out of congestion. That is why we are focusing on better managing congestion by encouraging people to walk, bike, and use transit and through transportation demand management programs that encourages behavior change around when, where and how people travel.

This plan focuses on how to move more people more efficiently. This is responding to what we are seeing today during peak travel times at peak locations, and expected population growth in neighboring northern California and Nevada. A major part of that work is spreading out when and where people travel to Lake Tahoe. It does not by nature mean increasing the amount of people who visit Lake Tahoe.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]
Sent: Friday, March 17, 2017 3:32 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Eric Beavers <ebeavers@ltusd.org>
Subject: [your-subject]

Message Body:

Morgan,

Thanks for coming to Kim Carr's LTCC class a couple of weeks ago. I enjoyed listening to what you had to say. You are quite knowledgeable on the subject of Tahoe Transportation.

I have a few comments on the 2017 Regional Plan that is really one comment with a few semi-colons. These comments are intended as questions rather than statements.

Is it true that if you make the four-lane highway a six-lane highway, people will tend to drive more because they expect traffic will decrease? If so, the increased lanes may not work as intended. The traffic would remain the same because of the increased number of drivers.

Following this logic, if the transportation within the basin is improved, will not more people visit the basin and therefore decrease some of the improvement? Also, if we improve our bike lanes and make it easier to get around, won't Tahoe be more attractive, pull in more visitors, and therefore increase the congestion and the stress on the transportation system, and other systems? How much of this is running to stand still or trying to pull yourself up by your own bootstraps?

How will Tahoe deal with the increased numbers due to our improvements? Will these improvements not put pressures on other parts of the system? Are we trying to stop the slashed carotid with more band-aids? Or perhaps stop the bleeding by letting the blood flow more smoothly?

I am trying to figure out the long term consequences of what this document would call "success." I certainly want Tahoe to be a nicer place to both live and visit. I live here and look forward to getting around easier both by bike and by other forms of transportation. I am just not sure how this helps us solve our long-term issues. Is it a bit like making the US a better place to immigrate in the early to mid-1800s? Better meant more people which required improvements which meant more people

Can we really create technical solutions to what seems to be a social problem? Is this document a short-term technical solution to what is really a long-term social problem? Is it possible there are too many people who have access to too many resources and too much political power who want to visit a land base that has too little capacity? Will we have decreased the number of cars filling our roadway only so my grandchildren can try to figure out how limit the number of buses on the road way. Again, like the 6 lane highway, now Tahoe would have the same traffic congestion, but more people.

None of this is intended as a condemnation of the plan. I am sure most if not all of what I have presented has been discussed by planners ad nauseum . You folks understand the ins and outs of transportation far better than I do. I am just curious how the experts in transportation are talking about and dealing with these issues.

Thank you for your time, and again, thank you for the time you gave us in Kim's class.

Sincerely,
Eric Beavers

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This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)



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DATE: April 10, 2017
TO: Friends of the West Shore and Tahoe Area Sierra Club
FROM: TRPA Staff
RE: Response to Friends of the West Shore and Tahoe Area Sierra Club Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Quashnick, Ms. Ames, and Ms. Gearhart:

Thank you for Friends for the West Shore (FOWS) and Tahoe Area Sierra Club's (TASC) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We have responded to FOWS and TASC specific comments and recommendations below. Please also see Attachment A for the TRPA response to the League to Save Lake Tahoe's comments, which FOWS and TASC incorporated into their own comments.

1. Recommendation: "No Net VMT" Policy.

FOWS and TASC support a "no net VMT" policy. The suggestion may have unintended consequences and may not yield the desired aim of reducing and managing traffic and congestion. Such a policy would likely stop most redevelopment projects needed to support the implementation of Area Plans and the TRPA Regional Plan. For example, the recently adopted Tahoe City Lodge project enthusiastically supported by the League as environmentally beneficial could not have been approved. Additionally, existing policies and codes are already shaping projects to use innovative solutions to reduce VMT, such as supplying visitors and residents transit passes and indoor bike parking as part of hotel stays or leases. The Tahoe City Lodge is a great example of this type of project that was designed using existing policies and codes. A "No net VMT" policy would also likely require extensive environmental review since slowing environmental redevelopment could potentially have environmental impacts beyond the VMT it is targeted to limit.

FOWS and TASC also suggest a policy that regulates **special events or prohibit temporary activities from increasing vehicle trips during peak periods**. While only local jurisdictions directly permit special events or temporary activities, TRPA regularly coordinates with local governments to require development of traffic plans for special events, as shown in Policy 4.9 which reads: "Require the development of traffic management plans for major temporary seasonal activities, including the coordination of simultaneously occurring events." Those plans routinely require event providers to provide shuttles, ample bicycle parking and other traffic management measures and incentives to manage congestion and encourage people to walk, bike, and use transit. The Tahoe Region is a resort destination and special events and temporary activities are woven into the fabric of its economy. An outright prohibition as suggested is inconsistent with the existing approved plans and land uses. The RTP addresses the concern by

emphasizing the growth of transit service and alternative means of travel to and from the Region rather than prohibiting certain types of events.

2. & 3. Recommendation: Environmental Document Analysis Adjustments:

Regarding your comments suggesting that the baseline traffic analysis include impacts from recently approved projects just outside the Region (Squaw Valley, Martis Valley West), post 2012 RPU Amendments, post-2014 (baseline year) traffic counts, and alleged land use changes regarding vacation home rentals. The IS/IEC traffic analysis includes changes to the transportation system and land use development patterns that have occurred, or are newly planned to occur, since adoption of the 2012 RTP as documented within Appendix D of the Draft RTP. After completion of the 2012 Regional Transportation Plan, TRPA initiated an update to the TransCAD model. The update applied 2010 Census demographic updates and incorporated data from a 2011 license plate survey. The data refinements better identified and responded to changing travel behavior in the Region. Notably, these refinements provided an updated accounting of several variables that serve as critical primary predictors of travel behavior for the TRPA model, including the overall percentage of full-time homeowners, secondary homeowners, commuters, and visitors to the Region at the seven Basin-entry locations. The data refinements for this model update also included use of the latest US Census demographic and socioeconomic data (US Census 2010), including: resident vs. seasonal homeownership, persons per occupied dwelling unit, household income, and employment.

Some comments suggest that the existing baseline is artificially low and that the transportation analysis did not account for potential increases in economic activity, the temporary effects of drought, or other changes in visitation that could increase future traffic into and through the Region since 2014. The IS/IEC is based on a 2014 baseline. Other environmental review guidelines (e.g. CEQA Guidelines Section 15125, Environmental Setting) and judicial guidance on the subject of baseline have determined that the baseline against which a project's impacts should be compared is generally existing conditions at the time the analysis commenced unless special circumstances warrant a modified baseline. Because the modeling process is extremely lengthy, TRPA began development of the Regional Transportation Plan model inputs in the summer of 2015. Since land use regulations and information regarding existing and available development rights is constantly being updated, running the model necessitates selecting a cutoff date and loading the model with the best available data as of that date, in this instance December 31, 2014. Therefore, the modeled land-use scenario included all regulations and in place as of December 31, 2014, and all data on existing and planned development in place up to December 31, 2014, with the documentation available by August 2015. The TRPA Governing Board acknowledged this cut-off date at their June 24, 2015 meeting, and at that time, the most up to date traffic count information published by Caltrans and NDOT were the 2014 Traffic Counts. The IS/IEC traffic analysis was conducted by using the 2014 base year, prepared using the 2012 RPU/RTP Model land use inputs (2010 base year) updated using the most up-to-date information and forecasting methodology, described above and within RTP Appendix D. Therefore, the traffic analysis conducted for this RTP IS/IEC represents a 2014 land use scenario produced with the best available traffic model configuration available at the time the model was run.

Appendix D of the RTP contains detailed descriptions of the methods used for estimating overnight visitation (hotel/motel occupancies) and seasonal and vacation home use. Estimates of day-use visitation and addition of external trips from development adjacent to TRPA boundaries are also described within Appendix D: "In order to account for this additional traffic growth, TRPA conducted a series of sensitivity analyses to better characterize the anticipated increase in day-use visitation and increase in projected traffic counts along the two corridors. Within the

modeling framework, day-use visitation was originally generated from the 2005 travel survey records and has since been updated with the 2010-2011 License Plate and Postcard Survey. External station cordon counts are then used to calibrate the day-use population size, which is then indexed to the overnight visitor population. Therefore, if the overnight visitor population increases, the day-use visitation component of the model increases accordingly. Another factor that affects the day use population in the model is increases in commercial center and recreational amenities (i.e. beach attractiveness and gaming). Each of these areas is assigned an attraction value, which influences the number of day visitors that are assumed to come to the Region each day. To reflect the potential growth along the two north entry-corridors, TRPA made slight adjustments to the hotel-motel occupancies as well as to beach attractiveness factors to influence greater day-use visitation from the two projects along the SR 89 and SR 267 corridors. The purpose of the analysis was intended to match the forecasted entry volumes forecasted in the Squaw and Martis Valley analyses to be commensurate with the forecasted model values. The comparison of TRPA modeled traffic entry volumes and the modeled entry volumes by adjacent metropolitan planning organizations is shown in Table D.17 within Appendix D. For additional information concerning how the Lake Tahoe Transportation Model generates day visitation, refer to the Lake Tahoe Resident and Visitor Model; Model Description and Final Results, August 2007.”

As described above, there are not special circumstances related to transportation modeling in the case of the IS/IEC that warrant a modified baseline. Thus, use of existing conditions as baseline is appropriate. Although traffic counts have increased slightly in the past few years, attempting to make a prediction on all the future factors that would influence population and travel behavior would be speculative. The future year traffic forecasts estimated by the TRPA travel demand model take into consideration reasonably expected growth in population, school enrollment, employment levels, and overnight and day use visitors due to release of new allocations, as presented in the Lake Tahoe Resident and Visitor Model Report (Parsons Brinckerhoff 2007).

Staff has analyzed the information suggested by FOWS/TASC and determines that none of it alters the conclusion that the proposed changes from the 2012 RTP to the 2017 RTP will not have an unmitigated significant adverse environmental impact.

4. Recommendation: Parking Management Strategies

FOWS and TASC suggest that the RTP should incorporate policies which do not allow for increases in parking spaces while incentivizing the removal of existing parking spaces.

The parking management policies in the 2017 RTP/SCS carry forward the 2012 RTP approach with enhancements to reflect contemporary best practices. Rather than pull back, the 2017 RTP/SCS policies further encourage innovative parking management strategies at Lake Tahoe. As Attachment B: Goals and Policies Crosswalk of the IS/ IEC illustrates, policies referring to parking management have been strengthened. Additions have been made for technology opportunities. Other amendments add parking management strategies to area plans. New policies added since 2012 emphasize the importance of parking management strategies in town centers, at high use recreation destinations, and along constrained corridors where shoulder parking is currently presenting safety and environmental issues. All of these changes provide much stronger grounds to implement more aggressive parking management strategies than the 2012 Plan.

There is no regionally suitable, one-size fits all maximum parking standard. The better avenue for implementation of the approach is through local government Area Plans and development of corridor plans tailored to the specific uses within each of the six regional corridors. The 2017

RTP/SCS policies support the implementation of dynamic, demand based pricing. Nonetheless paid parking must be implemented and operated by an entity with ownership of the property or through agreements with property owners. TRPA does not have minimum or maximum parking standards. Parking standards are set only by local jurisdictions through area plans and local codes. Existing TRPA policies and code require local jurisdictions to analyze parking and include parking measures to encourage walking, biking, and transit development of area plans.

Overall, the Tahoe Region is seeing progress in this area. Parking studies focused on shared parking and pricing elasticities have been conducted in Placer and Washoe Counties. The Placer Area Plan has newly adopted progressive parking management strategies within it's policies and in proposed projects within the draft 2017 RTP/SCS. As an example, the Tahoe Transportation District in partnership with Washoe County, NV State Lands, and others are building off highway parking amenities within the SR 28 corridor including fees for off street parking while restricting highway shoulder parking and incorporating real-time technology to provide parking availability information to users before they choose to drive to destinations. TRPA will continue to develop these and other aggressive parking management solutions with our partners.

5. Recommendation: Funding and Adaptive Roadway Management

Thank you for your comments regarding support for regional funding mechanisms and adaptive roadway management. A bi-state funding workgroup will be forming that will look at all possible funding mechanisms to support priority transportation projects that could also act as an incentive system. Adaptive Roadway Management projects are already under discussion with many of the appropriate lead and operating agencies. As projects further develop, TRPA will support their accelerated delivery as appropriate.

TRPA appreciates the FOWS and TASC comments on the draft 2017 Regional Transportation Plan and look forward to your continued participation.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

DATE: April 10, 2017
TO: The League to Save Lake Tahoe: Shannon Eckmeyer, Esq. and Marissa Fox, Esq.
FROM: TRPA Staff
RE: Response to League to Save Lake Tahoe Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Eckmeyer and Ms. Fox:

Thank you for the League to Save Lake Tahoe's (The League) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your recognition of the forward-thinking concepts within the plan and that it represents tangible progress for the Tahoe Region. We have responded to each of your comments, questions, and recommendations below.

CATEGORY: Bolstering RTP policies and including additional solutions will contribute to the success of this Plan.

1. League Recommendation: The RTP should incorporate more aggressive parking management strategies similar to those included in the 2012 RTP.

The parking management policies in the 2017 RTP/SCS carry forward the 2012 RTP approach with enhancements to reflect contemporary best practices. Rather than pull back, the 2017 RTP/SCS policies further encourage innovative parking management strategies at Lake Tahoe. As Attachment A: Goals and Policies Crosswalk of the IS/ IEC illustrates, policies referring to parking management have been strengthened. Additions have been made for technology opportunities. Other amendments add parking management strategies to area plans. New policies added since 2012 emphasize the importance of parking management strategies in town centers, at high use recreation destinations, and along constrained corridors where shoulder parking is currently presenting safety and environmental issues. All of these changes provide much stronger grounds to implement more aggressive parking management strategies than the 2012 Plan.

In your letter, you reference the TRIA tool and state the analysis "omitted assumed reduction in minimum parking requirements." As you will see Appendix D of the Draft 2017 RTP/SCS pages D-30 through D-31 as well as table D-19 parking management strategies implementation is included as a reduction consistent with the 2012 RTP analysis.

Under this item the League also suggests adopting two additional policies regarding parking management, they are:

- **The RTP should eliminate minimum parking requirements and impose maximum parking requirements.**
- **The RTP should implement dynamic, demand-based parking pricing.**

Thank you for the suggestions. While each policy on its face appears workable, neither is well suited to the RTP. But other included policies can be relied upon to accomplish the same result.

- First, there is no regionally suitable, one-size fits all maximum parking standard. The better avenue for implementation of the approach is thru local government Area Plans.
- TRPA does not have minimum or maximum parking standards. Parking standards are set only by local jurisdictions through area plans and local codes. Existing TRPA policies and code require local jurisdictions to analyze parking and include parking measures to encourage walking, biking, and transit development of area plans.
- The 2017 RTP/SCS policies support the implementation of dynamic, demand based pricing. Nonetheless paid parking must be implemented and operated by an entity with ownership of the property or through agreements with property owners. TRPA does not have authority to require or collect fees for paid parking but local governments and land managers do. TRPA is working closely with many public land managers, the Tahoe Transportation District, and local jurisdictions to identify locations where dynamic, demand-based parking is appropriate. We agree demand-based paid parking can be a tool to help generate necessary funds to support transportation improvements and provide the incentive / disincentive system to encourage transit or disperse people's destinations during peak periods.

Overall, the Tahoe Region is seeing progress in this area. Parking studies focused on shared parking and pricing elasticities have been conducted in Placer and Washoe Counties. The Placer Area Plan has newly adopted progressive parking management strategies within it's policies and in proposed projects within the draft 2017 RTP/SCS. As an example, the Tahoe Transportation District in partnership with Washoe County, NV State Lands, and others are building off highway parking amenities within the SR 28 corridor including fees for off street parking while restricting highway shoulder parking and incorporating real-time technology to provide parking availability information to users before they choose to drive to destinations. TRPA will continue to develop these and other aggressive parking management solutions with our partners.

2. League Recommendation: Private investment in transit is essential to implementing sustainable transportation solutions.

TRPA wholeheartedly agrees with this assertion and supports public private partnership whenever possible. The League's letter discusses the Employer-Based Trip Reduction program. TRPA's program, first established in 1992 is incorporated into the code and is badly in need of an update to reflect more current feasible transportation demand management methods that use innovative technology and are supported by strong partnerships with the private sector, non-profits, advocacy groups, and local jurisdictions. As we discussed at our February 10, 2017 meeting, TRPA encourages the League to take an active role in the update of these programs and possibly TRPA code modifications to reflect best practices.

3. League Request for Information: The League supports transportation pilot projects and requests further information on the Emerald Bay Pilot Project.

The League's support of pilot projects is noted. Phasing project delivery lends success to many projects as it allows implementers to be adaptive as challenges arise and solutions are delivered. The referenced project is the "SR 89 Recreation Corridor Improvement Project," EIP project

number 01.01.03.0036 and is in the early stages of planning and funding solicitation. As shown in the EIP Tracker and in Appendix B of the Plan, the SR 89 Recreation Corridor Improvement Project is on the 2017 RTP/SCS constrained list under the Corridor Revitalization category and is estimated to cost \$5 million dollars, which includes all phases of planning and implementation. Expected performance measures include miles of roads decommissioned or retrofitted, pounds of air pollutants removed or avoided by project, and tons of greenhouse gases reduced. As you are aware, this project is included in a recent appropriation request the League supported under the 2016 Lake Tahoe Restoration Act.

Planning is already underway. In the fall of 2016, with support from the TRPA Governing Board EIP Committee, TRPA proposed the pilot project along the SR 89 Recreation Corridor. Staff immediately began coordinating with the U.S. Forest Service to outline options to include in the project that would prioritize and increase transit access, manage parking, and implement adaptive roadway management tools. We encourage the League to lend support to the U.S. Forest Service, as the lead agency for the planning of this project.

4. League Recommendation: Vacation home rentals undermine the RPU and RTP and must be regulated by the TRPA.

The League recommends adding “all overnight uses” to Policy 1.6. The draft policy already incorporates all major commercial interests. TRPA is involved in a number of housing forums. We anticipate public discussion on the concerns of residential building allocations and possible land use policies. TRPA and partners will be working with all major commercial interests that manage vacation home rentals through transportation demand management programs focused on encouraging active transportation and transit as a means for getting around Tahoe.

5. League Recommendation: Clarification and information needed on transit infrastructure and roadway structures.

Under this item the Leagues suggests the following:

- **Transit infrastructure should prioritize transit lanes before or alongside transit signal priority. There should also be clarification on regional signal timing.**

The draft 2017 RTP/SCS includes three projects that will work in tandem to deliver a more efficient operated roadway system for U.S. Highway 50 on the South shore of Lake Tahoe. These projects, though listed individually may be delivered as one bundled project, or may be delivered in phases. These include:

- A. Constrained List: EIP Project Number 03.01.02.0106: Transit Signal Priority Along South Shore
- B. Constrained List: EIP Project Number 03.01.02.0078: California Multi-Modal Signal Control Optimization
- C. Unconstrained List: EIP Project Number 03.01.02.0133: Adaptive Traffic Management on U.S. Highway 50

As noted in the draft plan, TRPA works with implementing agencies to bundle projects as much as possible to decrease impact on roadway users, reduce costs and duplication of work, and deliver more comprehensive projects. There are times when lead agencies need to phase implementation to continue incremental progress as quickly as possible. Through discussions with Caltrans and transit operators, signal-preemption is a necessary and easier first step in

prioritizing transit at Lake Tahoe. That being said, TRPA is already working with partners on applying for funding that could bundle all three of the projects listed above into one study to assess best practice tools, cost / benefit, and recommendations for implementation.

The League's letter also comments on existing signal timing and coordination along the South Shore. Please see the attached Caltrans map of existing signal coordination (Attachment B).

The League also suggests **“Clarification is needed on currently approved and soon-to-be reviewed roadway projects as they will actually increase capacity for private automobile use (and likely VMT).”**

Both the U.S 50 Community Revitalization Project and the SR 89 Fanny Bridge Community Revitalization Project are EIP projects design to deliver multiple benefits. Each is targeted to reduce congestion at known chokepoints, increase safety and attractiveness for walking, biking, and using transit, improve flow for goods movement, and support economic vitality by creating a community-friendly main street. Coupled with the limited amount of proposed new roadway, both projects also reduce speeds and provide traffic calming that limit capacity in the existing roadway sections that are circumvented. The EIS for the Fanny Bridge project analyzed and accounted for VMT. The soon to be released U.S. 50 Project EIS will also analyze VMT impacts.

Under this item the League also requests **“Additional information is needed on Lake Tahoe specific traffic design volume.”**

Implementing agencies, such as Caltrans, NDOT, and local jurisdictions often use state standards or peak of the peak traffic volumes to assess and design roadway improvement projects, such as the size and number of lanes within a roundabout. It can be difficult to apply Tahoe relevant design volumes for this analysis, because no “Tahoe specific” design volume has been established. To date, design volumes must be reduced project-by-project to continue to encourage projects that meet goals and policies to manage congestion, prioritize transit, and increase safety and access for bicyclists and pedestrians. TRPA is already working with both state DOTs on recognizing Tahoe appropriate design volume standards for the Region, rather than addressing it project by project. We welcome The League's support of this effort.

6. League Recommendation: Additional suggestions to RTP Goals and technical corrections.

The League suggests that the VMT and greenhouse gas reduction targets are weakened from 2020 to 2035. This is inaccurate. The targets set by the California Air Resources Board (CARB) reflect the assumption of visitation and population growth, and associated VMT. TRPA is currently working with CARB to reevaluate the GHG reduction targets applicable to for the 2021 RTP/SCS, to respond to more stringent CA statewide GHG reduction goals recently enacted. Additionally, the League states that “there is no clarification as to why the emissions are actually increasing...” This is inaccurate. All of the assumptions and explanations of those assumptions are in Appendix D.

The League also suggests that storm drains are not consistently maintained on a regional level. Maintaining storm drains and reducing stormwater runoff is the responsibility of local jurisdictions and roadway operators such as the State departments of transportation under both TMDL regulatory requirements and Public Works budgets. All entities are working diligently to comply with stormwater management to meet TMDL requirements, including storm drain

maintenance. The 2017 RTP/SCS emphasizes the importance of roadway and water quality infrastructure maintenance. In the draft 2017 RTP/SCS, five percent of foreseeable revenue is planned specially for roadway water quality projects. Additionally, many corridor revitalization and active transportation projects include improvements to stormwater management.

The League reiterates previous comments to consider adding the words “restore” to Goal 1, and “sustainable” to Goal 4. TRPA staff appreciates the feedback but does feel these items are covered. The intent of the first goal is clear using the existing proposed language, “protect and enhance.” Goal 4 focuses on the importance of coordinated operations and congestion management which support sustainability. Sustainability is covered all through the 2017 RTP/SCS and provides the foundation of the plan and each Goal.

CATEGORY: Effective oversight and ongoing coordination among local jurisdictions and agencies is essential to the RTP’s success. Implementation of the RTP relies on information referenced in currently unavailable TTD plans.

In the multi-layered work of transportation planning, the relationship between the RTP, which is a general policy framework plan, and much more detailed later implementation plans, such as corridor plans, can be confusing. The RTP does not “rely” on information from the Corridor Plans. The RTP policies guide the development of further details in modal plans, corridor plans, area plans, and project specific studies. The cascade of plans moves from the general to very specific at the project design level. TRPA works closely with the Region’s transit operators and local jurisdictions while developing area-specific implementation plans and projects. The information located in the draft 2017 RTP/SCS combines all known inputs and is the most up-to-date information available. The RTP is at the top of the planning hierarchy and uses goals, policies, and priorities to guide what other plans and projects must address. The RTP prioritizes free-to-the-user transit, increased transit frequency and expanded season and hours of operation, increased transit access to recreation destinations and neighborhoods, closing gaps on shared-use paths for active transportation, and technology to provide real-time information and incentivize behavior change that disperse when, where, and how people travel. The specifics of how these priorities will be delivered are encompassed in the projects listed in the constrained and unconstrained project lists in Appendix B and further elaborated on the EIP Project Tracker.

1. League Recommendation: “No Net VMT” Policy suggestion & Uncertainty surrounding the status of both the VMT Threshold indicator and implementation of the RTP support an interim “no net VMT” policy

The League reiterates its desire for a “no net VMT” policy. The suggestion while attractive on its face may have unintended consequences and may not yield the desired aim of reducing and managing traffic and congestion. Such a policy would likely stop most redevelopment projects needed to support the implementation of Area Plans and the TRPA Regional Plan. For example, the recently adopted Tahoe City Lodge project enthusiastically supported by the League as environmentally beneficial could not have been approved. Additionally, existing policies and codes are already shaping projects to use innovative solutions to reduce VMT, such as supplying visitors and residents transit passes and indoor bike parking as part of hotel stays or leases. As you note, the Tahoe City Lodge is a great example of this type of project that was designed using existing policies and codes.

In the many meetings between TRPA and the League on VMT, the League has often advocated to use VMT as a water quality metric. This question is currently being addressed through the Transportation Measures Working Group in which the League is participating. The VMT

threshold indicator is established to assess nitrogen deposition into Lake Tahoe. The Working Group will consider possible transportation metrics to measure other factors of concerns such as congestion, water quality, air quality and more.

A “No net VMT” policy would also likely require extensive environmental review since slowing environmental redevelopment could potentially have environmental impacts beyond the VMT it is targeted to limit.

2. League Recommendation: Bay Area region should be included as part of the RTP as it is unknown if it will be incorporated into the TTD plans.

The Bay Area region’s connection to Lake Tahoe transportation is incorporated into the draft 2017 plan. The plan frequently underscores the major drive up market from the Northern California area and the need to work with mega-region partners to leverage funds, projects, and transportation demand management programs to encourage visitors to use transit or rail when visiting the Tahoe Region. As noted in the plan, this work is already underway. A coalition of mega-region partners is now established and TRPA expects the 2021 Regional Transportation Plan to include more clearly defined projects that will enhance inter-regional connections.

CATEGORY: Congestion Management Process is unknown creating uncertainty to RTP implementation.

Though the Congestion Management Process (CMP) is under development, it may not be appropriate to claim uncertainty is created for the RTP. The CMP is a requirement for urban MPO’s like TRPA and being new is not yet well understood by stakeholders. The CMP is a requirement to monitor and report on system and project level performance, and ensure that the direction of funds is allocated to projects that contribute the most to better managing congestion at Lake Tahoe. TRPA already monitors and reports on various transportation measures and awards transit funds based on system performance. In this respect, the CMP builds on the way TRPA has monitored transportation system performance for decades. As a first step TRPA convened the Transportation Measures Working Group to collaboratively review current measures to ensure the best measures are used to determine transportation system’s success. The League is actively participating in the Working Group. Additionally, TRPA is piloting its performance assessment tool with implementing agencies. Once finalized, the tool will be used to allocate transportation funds directly through a competitive grant process.

TRPA appreciates the League’s comments on the draft 2017 Regional Transportation Plan and looks forward to working together to improve transportation demand management programs, transportation measures, and plan projects that help the Region meet the 2017 RTP/SCS goals and policies.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

2017/2012 RTP POLICY CROSSWALK

2017 GOAL	2017 POLICY	2012 POLICY			JUSTIFICATION
ENVIRONMENT	Protect and enhance the environment, promote energy conservation, and reduce greenhouse gas emissions.				
	1.1 Support mixed-use and transit oriented development that encourages walking, bicycling, and easy access to existing and planned transit stops.	1.1 Support mixed-use that encourages walking, bicycling, and easy access to existing and planned transit stops in Centers.	4.2 Provide transit facilities that encourage transit, bicycle, and pedestrian usage.		4.2 was removed as the link between active transportation (bicycle and pedestrian) and transit facilities is included in policies of the Active Transportation Plan and is duplicative of 2012 Policy 1.1
	1.2 Leverage transportation projects to benefit multiple environmental thresholds through integration with the Environmental Improvement Program.	1.4 Develop and implement a Sustainable Communities Strategy (SCS) to meet TRPA thresholds and other statutory requirements.	1.5 Support sustainable transportation infrastructure and operational programs that provide environmental and community benefits.	13.2 Integrate transportation programs into the Environmental Improvement Program (EIP).	A Sustainable Communities Strategy is adopted in concert with the regional transportation plan, and threshold attainment is included in 2016 policy 1.2, therefore policy 2012 1.4 is not needed. 2016 policy 1.2 replaces 2012 policy 1.5 as sustainable transportation and infrastructure is a primary component of the regional transportation plan and explained in other chapters. 2016 policy 1.2 also replaces 13.2 in reference to the Environmental Improvement Program.
	1.3 Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses by prioritizing projects and programs that enhance non-automobile travel modes.	1.2 Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses.	1.3 Consider non-automobile travel modes when mitigating traffic-related project impacts.		2012 policies 1.2, 1.3, and 10.5 were combined into 2016 Policy 1.3 which addresses development impacts and mitigation -prioritizing those non-automobile mitigation programs
	1.4 Facilitate the use of electric and zero emission vehicles and fleets by supporting deployment of vehicle charging infrastructure within the Region, and supporting incentives and education of residents, businesses, and visitors related to the use of electric and zero emission vehicles.	4.4 Use alternative fuels to the maximum extent feasible in public transit fleets.	9.3 Encourage rental car providers to offer vehicles that are low- or zero-emission within the Tahoe Region.		2012 policy 4.4 is now included in 2016 policy 1.4. The alternative fuel policies were revised to focus on electric and zero emission vehicles. The language more broadly supports multiple types of incentive programs and vehicle types. This updated language also incorporates Placer county's comments during TAC member review.
	1.5 Require major employers of 100 employees or more to implement vehicle trip reduction programs.	9.1 Require major employers to implement vehicle trip reduction programs. Such programs could include: carpool and vanpool matching programs, employee shuttles, on-site secure bicycle storage and shower facilities, flexible work hours, and parking and transit use incentives.			The 2016 policy now clarifies that large employers are those with 100 or more employees as specified in the TRPA Code of Ordinances. Examples of incentive programs have been deleted for continued flexibility with best practice research. No changes to the code occurred from 2012 to 2016.
	1.6 Require new and encourage existing major commercial interests providing gaming, recreational activities, excursion services, condominiums, timeshares, hotels, and motels to participate in transportation demand programs and projects.	7.2 Require major commercial interests providing gaming, recreational activities, or excursion services to provide or participate in joint shuttle services or provide transit use incentives to their guests or patrons; and require connections with intermodal transportation facilities.	9.4 Require new, and encourage existing condominiums, timeshares, hotels, and motels to participate in public transit and/or private shuttle programs, and provide transit information and incentives to their guests and residents.		These policies were combined to eliminate redundancy.
	1.7 Coordinate with the City of South Lake Tahoe to update and maintain an Airport Master Plan and limit aviation facilities within the Tahoe Region to existing facilities.	12.2 Limit aviation facilities within the Tahoe Region to existing facilities.	12.1 Update and maintain an Airport Master Plan.		These policies were combined to eliminate redundancy and clarify roles and responsibilities.
	1.8 Strongly encourage traffic calming and noise reduction strategies when planning transportation improvements.				This policy was added to support environmental thresholds and to be consistent with Area Plan policies.
	1.9 Develop and implement a cooperative, continuous, and comprehensive Congestion Management Process to adaptively manage congestion within the Region's multi-modal transportation system.				This policy was added to be consistent with Area Plan policies and new FAST Act requirements designating the Tahoe Metropolitan Planning Organization as a Transportation Management Agency serving a population greater than 200,000 people.

2017/2012 RTP POLICY CROSSWALK

CONNECTIVITY		Enhance and sustain the connectivity and accessibility of the Tahoe transportation system, across and between modes, communities, and neighboring regions, for people and goods.			
	2.1 Coordinate with Federal, state, and local government as well as private sector partners to identify and secure adequate transit service funding that provides a viable transportation alternative to the private automobile for all categories of travelers in the Region.	5.2 Seek cooperation from neighboring jurisdictions to expand non-automobile transportation to cities, towns, and recreational areas outside of the Tahoe Region.			This policy was updated to formalize the need for the Region to coordinate on funding sources, expand the list of partners, and to be consistent with Area Plan policies.
	2.2 Provide frequent transit service to major summer and winter recreational areas.	4.3 Provide transit service to major summer and winter recreational areas.			This policy was modified to specify "frequent" transit service to clarify the need not only for access but frequent service to encourage increased ridership.
	2.3 Establish regional partnerships with surrounding metropolitan areas to expand transit to and from Lake Tahoe.	5.1 Participate in state and local transportation planning efforts to ensure coordination and consistency amongst various planning agencies inside and outside the Region.			This policy was updated to reflect current and future efforts to collaborate and plan with neighboring regions who's growth and transportation strategies impact the Tahoe Region.
	2.4 Improve the existing transit system for the user making it frequent, fun, and free in targeted locations. Consider and use increased frequency, preferential signal controls, priority travel lanes, expanded service areas, and extended service hours.	4.1 Improve existing transit systems through increased frequency, preferential signal controls, expanded service areas, and extended service hours.			This policy language was expanded to include the basic tenants desired for transit planning and provide flexibility for new and innovative approaches to improving the transit system.
	2.5 Integrate transit services across the Region. Develop and use unified fare payment systems, information portals, and shared transfers.				This policy was added to be consistent with Draft Corridor Connection Plan and Draft Long Range Transit Plan. This policy directs more efficient regional transit operations until free-to-the-users transit can be implemented.
	2.6 Consider waterborne transportation systems using best available technology to minimize air and water quality impacts in coordination with other modal options, as an alternative to automobile travel within the Region.	4.6 Consider waterborne transportation systems in coordination with other public and private transportation systems, including the pedestrian and bicycle network, using best available technology to minimize air and water quality impacts as an alternative to automobile travel within the Region.			This policy language was modified to clarify intermodal connectivity and public/private partnership needs when designing and implementing waterborne transportation.
	2.7 Provide specialized public transportation services for individuals with disabilities through subsidized fare programs for transit, taxi, demand response, and accessible van services.	11.1 Provide specialized public transportation services with subsidized fare programs for transit, taxi, demand response, and accessible van services.			This policy was clarified to include "individuals with disabilities" to be better reflect the type of services needed.
	2.8 Make transit and pedestrian facilities ADA-compliant and consistent with Coordinated Human Services Transportation Plans.	11.2 Ensure that transit and pedestrian facilities are ADA-compliant and consistent with the TMPO Coordinated Human Services Transportation Plan.			This policy was modified slightly to specify that the TMPO is not responsible for the Coordinated Human Services Transportation Plan, but continues to ensure consistency.
	2.9 Develop formal guidelines or standards for incorporating transit amenities in new development or redevelopment, as conditions of project approval.				This policy was added to increase transit oriented development and ensure consistency with Draft Corridor Connection Plan and Long Range Transit Plan.
	2.10 Provide public transit services at locations nearby school campuses.				This policy was added to encourage public/private partnerships, provide safe routes to schools and modified in response to comments from Placer County during TAC review to comply with California and FTA regulations.

2017/2012 RTP POLICY CROSSWALK

	2.11 Coordinate public and private transit service, where feasible, to reduce service costs and avoid service duplication.				This policy was added to encourage public/private partnerships, maximize funding opportunities, and for consistency with Area Plan policies.
Active Transportation	2.12 Develop and maintain an Active Transportation Plan as part of the regional transportation plan. Include policies, a project list of existing and proposed bicycle and pedestrian facilities, and strategies for implementation in the Active Transportation Plan.	2.1 Develop and maintain a Lake Tahoe Region Bicycle and Pedestrian Plan (Bicycle and Pedestrian Plan) as a component of the Regional Transportation Plan (RTP); and maintain a list of existing and proposed bicycle and pedestrian facilities and strategies for implementation within the Bicycle and Pedestrian Plan.			The policy was updated to reflect the new name of the Bicycle and Pedestrian Plan, now called the Active Transportation Plan. The Active Transportation Plan was updated and approved in March of 2016.
	2.13 Incorporate programs and policies of the active transportation plan into regional and local land use plans and regulatory processes.	2.6 Promote the incorporation of programs and policies of the Bicycle and Pedestrian Plan into Regional and local land use plans and regulatory processes.			This policy was revised to "incorporate" rather than "promote". The Bicycle and Pedestrian Plan is now the "Active Transportation Plan"
	2.14 Construct, upgrade, and maintain pedestrian and bicycle facilities consistent with the active transportation plan.	2.2 Construct, upgrade, and maintain pedestrian and bicycle facilities consistent with the Lake Tahoe Region Bicycle and Pedestrian Plan.	2.3 Prioritize constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed concurrently with other projects.		The Bicycle and Pedestrian Plan is now the "Active Transportation Plan". 2012 policy 2.3 was removed because this concept of prioritization in urbanized areas has been incorporated into project prioritization criteria for the ATP and RTP. Additionally, 2012 policy 2.3 was duplicative of 2016 policy 2.14.
Multi-Modal	2.15 Accommodate the needs of all categories of travelers by designing and operating roads for safe, comfortable, and efficient travel for roadway users of all ages and abilities, such as pedestrians, bicyclists, transit riders, motorists, commercial vehicles, and emergency vehicles.	10.2 Use transportation system management (TSM) measures to improve the existing transportation system, while maintaining provision of bicycle and pedestrian facilities. TSM measures could include: dedicated turn lanes, intersection improvements, bicycle-activated signals, and roundabouts. Additionally, work with State Departments of Transportation (DOT) and local transportation departments to improve signal synchronization.			This policy was updated to reflect the national complete street policy that forms the basis of the way projects should be designed, constructed, and operated throughout the Region. The updated policy is more broad and provides greater flexibility when designing projects.
	2.16 Encourage parking management programs that incentivize non-auto modes and discourage private auto-mobile use at peak times in peak locations, alleviate circulating vehicle trips associated with parking availability, and minimize parking requirements through the use of shared-parking facilities while potentially providing funding that benefits infrastructure and services for transit, pedestrians, and bicyclists.	8.1 Encourage shared and other parking management strategies.	8.2 Encourage parking management programs that provide incentives to fund improvements benefiting transit users, pedestrians, and bicyclists.	8.3 Encourage parking management strategies that are tailored to the needs of each specific location and promote pedestrian and transit use.	2012 policies 8.1, 8.2, and 8.3 addressing parking management have been consolidated in 2016 policy 2.16. Additionally, 2016 policy 2.16 is consistent with Area Plan policies.

2017/2012 RTP POLICY CROSSWALK

	2.17 Coordinate and include in area plans, where applicable, intermodal transportation facilities (“Mobility Hubs”) that serve centers and other major areas of activity while encouraging the consolidation of off-street parking within mixed-use areas.	7.1 Require that Area Plans identify intermodal transportation facilities to serve each Center, and other major activity centers. Intermodal transportation facilities should incorporate planned regional transportation facilities, parking, and connections between them (e.g., sidewalks, enclosed walkways, etc.) and should accommodate increased use of transit and non-motorized travel modes. Local agencies may need to coordinate with state Departments of Transportation when identifying intermodal facilities.			2012 policy 7.1 was modified for clarity, for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan, and to encourage the consolidation of parking consistent with Area Plan policies.
	2.18 In roadway improvements, construct, upgrade, and maintain active transportation and transit facilities along major travel routes. In constrained locations, all design options should be considered, including but not limited to restriping, roadway realignment, signalization, and purchase of right of way.	10.1 Incorporate transit stops and bicycle and pedestrian facilities in roadway improvement projects.	2.3 Prioritize constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed concurrently with other projects.		These policies were updated for consistency with the 2016 Active Transportation Plan and to reduce duplication.
	2.19 Encourage jurisdiction partners to develop and plan coordinated wayfinding signage for awareness of alternative transportation modes including transit (TART/BlueGO), pedestrian, and bicycle facilities.	2.7 Implement safety awareness signage, road markings, educational programs, and programs that encourage bicycling and walking.			This policy was updated to promote the importance of including wayfinding signage into projects to encourage use of multi-modal options, to clarify implementation is the responsibility of partner local agencies and to include transit in addition to bicycling and walking. Additionally, this 2016 policy is consistent with Area Plan policies.
SAFETY Increase safety and security for all users of Tahoe's transportation system.					
	3.1 Coordinate the collection and analysis of safety data, identify areas of concern, and propose safety-related improvements that support state and federal safety programs and performance measures.				This policy was added for consistency with Draft Corridor Connection Plan, FHWA and State planning emphasis areas, State highway safety plans, and to increase safety for all users in the Tahoe Region.
	3.2 Consider safety data and use proven safety design countermeasures for safety hotspots recommended from roadway safety audits, the active transportation plan, corridor plans, and other reliable sources when designing new or modifying existing travel corridors.				This policy was added for consistency with Draft Corridor Connection Plan, FHWA and State planning emphasis areas, State highway safety plans, and to increase safety for all users in the Tahoe Region.
	3.3 Coordinate safety awareness programs that encourage law abiding behavior by all travelers.	2.7 Implement safety awareness signage, road markings, educational programs, and programs that encourage bicycling and walking.			This policy was revised to reflect the responsibility of the TRPA/TMPO as a regional coordination agency for overall safety programming, rather than an agency responsible for implementation of signage or road markings.
	3.4 Support emergency preparedness and response planning, including the development of regional evacuation plans, and encourage appropriate agencies to use traffic incident management performance measures.				This policy was added to reflect current state and federal planning requirements, and FHWA recommended innovations through the Everyday Counts Initiative.
	3.5 Design projects to maximize visibility at vehicular, bicycle, and pedestrian conflict points. Consider increased safety signage, site distance, and other design features, as appropriate.				This policy was added to increase safety for all users as a design element to projects and encourage design flexibility where appropriate per FHWA and California Department of Transportation recommendations.
OPERATIONS AND CONGESTION MANAGEMENT		Provide an efficient transportation network through coordinated operations, system management, technology, monitoring, and targeted investments.			

2017/2012 RTP POLICY CROSSWALK

	4.0 Prioritize regional and local investments that fulfill TRPA objectives in transit, active transportation, transportation demand management, and other programs and directly support identified TRPA transportation performance outcomes.				
	4.1 Identify opportunities to implement comprehensive transportation solutions that include technology, safety, and other supporting elements when developing infrastructure projects.				This policy was added to encourage comprehensive project planning and implementation, including the Tahoe Basin Intelligent Transportation System Strategic Plan's dig once policy.
	4.2 Collaborate with jurisdictions and DOT partners to develop adaptive management strategies for peak traffic periods at Basin entry/exit routes.				This policy was added to support the regional transportation project list, area plan policies, and encourage innovation in highway corridor operations.
	4.3 Promote awareness of travel options and conditions through advertising and real-time travel information.				This policy was added to support transportation demand management programs and encourage the spread of travel by time and mode type.
	4.4 Incorporate programs and policies of the Tahoe Basin Intelligent Transportation Systems Strategic Plan into regional and local land use plans and regulatory processes.	3.2 Implement measures consistent with the Federal Intelligent Transportation Systems (ITS) Program and the Tahoe Basin ITS Strategic Plan, including Traffic Management, Traveler Information Services, and Emergency Management Techniques.			The updated policy language clarifies and supports the incorporation of policies, programs and projects of the Tahoe Basin Intelligent Transportation Systems Strategic Plan into the Regional Transportation Plan.
	4.5 Support the use of emerging technologies, such as the development and use of mobile device applications, to navigate the active transportation network and facilitate ridesharing, efficient parking, transit use, and transportation network companies.	3.1 Implement electronic and automated payment systems for transit systems and paid parking areas, where appropriate.			This policy language was modified to more broadly support the use of emerging technologies for a variety of transportation related projects.
	4.6 Level of service (LOS) criteria for the Region's highway system and signalized intersections during peak periods shall be: "C" on rural recreational/scenic roads; "D" on rural developed area roads; "D" on urban developed area roads; "D" for signalized intersections. Level of Service "E" may be acceptable during peak periods in urban areas, but not to exceed four hours per day. These vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project-generated traffic in relation to overall traffic conditions on affected roadways.	10.7 Level of service (LOS) criteria for the Region's highway system and signalized intersections during peak periods shall be: <ul style="list-style-type: none">• Level of service "C" on rural recreational/ scenic roads.• Level of service "D" on rural developed area roads.• Level of service "D" on urban developed area roads.• Level of service "D" for signalized intersections.• Level of service "E" may be acceptable during peak periods in urban areas, not to exceed four hours per day.• These vehicle LOS standards may be exceeded when provisions for multimodal amenities and/ or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project-generated traffic in relation to overall traffic conditions on affected roadways.	10.5 Consider quality of service for transit, pedestrians, and bicyclists in addition to motor vehicles when analyzing development impacts on the transportation system.		2012 policy 10.7 was not changed. Policy 10.5 was removed because it is duplicative of 2012 policy 10.7, is duplicative of existing ATP policies, and not an appropriate policy at the regional scale. Additionally, level and quality of service issues are being reviewed to reflect current state and nationwide best practices.

2017/2012 RTP POLICY CROSSWALK

	4.7 Regional transportation plan updates shall review projected travel into and within adopted area plans and effectiveness of mobility strategies.				This policy was added to ensure performance of Area Plans and inform the congestion management process.
	4.8 Prohibit the construction of roadways to freeway design standards in the Tahoe Region. Establish Tahoe specific traffic design volume for project development and analysis.	10.6 Prohibit the construction of roadways to freeway design standards in the Tahoe Region.			This policy was updated to include establishing traffic design volume standards for the Tahoe Region to support the prohibition of construction of Tahoe roadways to freeway design standards and establish a equitable and routine process during project design.
	4.9 Require the development of traffic management plans for major temporary seasonal activities, including the coordination of simultaneously occurring events.	9.2 Require the development of traffic management plans for major temporary activities that account for the coordination and timing of simultaneously occurring activities.			This policy was modified slightly to specify that major temporary activities are typically seasonal and to clarify overall policy intent.
	4.10 Actively support Transportation Management Associations (TMAs) in the Tahoe Region.	4.5 Actively support Transportation Management Associations (TMAs) in the Tahoe Region.			No change for this policy.
	4.11 Establish a uniform method of data collection for resident and visitor travel behavior.				This policy was added to coordinate with regional partners to create opportunities for trend analysis and for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan.
	4.12 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 (e.g. the Lake (www.laketahoeinfo.org) website).				Policy added for consistency current TMPO overall work program, to inform the congestion management process, and to ensure consistency with Area Plan policies.
	4.13 Establish regional and inter-regional cooperation and cost-sharing to obtain basin-wide data for transportation-related activities.				This policy was added to encourage the use and proliferation of innovative data collection methods, and for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan.
	4.14 Design roadway corridors, including driveways, intersections, and scenic turnouts, to minimize impacts to regional traffic flow, transit, and bicycle and pedestrian facilities by using shared access points where feasible.	2.4 Design and site intersections and driveways, where feasible, to minimize impacts on public transportation, adjacent roadways and intersections, and bicycle and pedestrian facilities.	10.4 Reduce traffic conflicts by limiting or controlling turning movements from multiple parking lot access points onto major Regional travel routes and major local roadways; by designing and siting driveways to minimize impacts to Regional traffic flow, and by utilizing shared access points and shared driveways where feasible.	10.3 Preserve existing view turn-outs along scenic highways to maintain traffic flow and safety.	Policies 2.4, 10.3 and 10.4 were consolidated into 2016 policy 4.11 to reduce redundancy.
ECONOMIC VITALITY AND QUALITY OF LIFE Support the economic vitality of the Tahoe Region to enable a diverse workforce, sustainable environment, and quality experience for both residents and visitors.					
	5.1 Encourage community revitalization and transit oriented development projects that comprehensively support regional and local transportation, housing, land use, environment, and other goals.	6.2 Enhance the economic vitality of the Region by efficiently connecting people to jobs, goods, services, and other communities.	6.1 Develop and track measures of economic vitality related to transportation, (i.e., traffic and pedestrian counts, employment, hotel/motel occupancies, and other visitation trends) as part of the adaptive management system.		2012 policy 6.2 was removed because the concept of economic vitality is captured throughout the regional transportation plan and broadly incorporated into 2016 policy 5.1. 2012 Policy 6.1 was removed because we now have system-level performance measures for each goal in the plan as part of the congestion management process, which also includes project-level performance measures.

2017/2012 RTP POLICY CROSSWALK

	5.2 Provide multimodal access to recreation sites. Encourage collaboration between public lands managers, departments of transportation, transit providers, and other regional partners to improve year-round access to dispersed recreation activities. Strategies could include active transportation end-of-trip facilities, transit services, parking management programs, and incentives to use multi-modal transport.				This policy was added as it is the major theme of the 2016 regional transportation plan and responds to public input.
	5.3 Collaborate with local, state, regional, federal, and private partners to develop a regional revenue source to fund Lake Tahoe transportation and water quality projects.	6.3 Support public-private partnerships and business improvement districts when planning, financing, and implementing transportation and air quality programs and projects.	13.1 Collaborate with local, state, regional, federal, and private partners to develop dedicated funding and implementation programs for Lake Tahoe and the surrounding regions.		These policies were consolidated into 2016 policies 5.3 and 5.4 to reduce duplication.
	5.4 Collaborate with regional and inter-regional partners to establish efficient transportation connections within the Trans-Sierra Region including to and from Tahoe and surrounding metropolitan areas.	5.1 Participate in state and local transportation planning efforts to ensure coordination and consistency amongst various planning agencies inside and outside the Region.	5.3 Work with appropriate public entities, tribal governments, and private interest groups to ensure coordination and consistency.		These policies were consolidated into 2016 policies 5.3 and 5.4 to reduce duplication.
SYSTEM PRESERVATION Provide for the preservation of the existing transportation system through maintenance activities that support climate resiliency, water quality, and safety.					
	6.1 Preserve the condition of sidewalks and bicycle facilities and where feasible, maintain their year-round use.	2.5 Preserve the condition of sidewalks and bicycle facilities and where feasible, maintain their year-round use.			This policy has not changed.
	6.2 Maintain and preserve pavement condition to a level that supports the safety of the traveling public and protects water quality.				This policy was added to leverage environmental improvement projects in coordination with transportation projects, per FHWA requirements for asset management, and consistency with FHWA recommendation innovations through the Everyday Counts Initiative.
	6.3 Make “dig once” the basin-wide standard, requiring public and private roadway projects to accommodate the installation of conduit to support community needs. (e.g.: fiber optic, broadband, lighting, etc.)				This policy was added for consistency with the Tahoe Basin Intelligent Transportation Systems Strategic Plan and encourage the "dig once" philosophy into all projects.
	6.4 Consider the increased vulnerability and risk to transportation infrastructure from climate stressors, such as increased precipitation, flooding, and drought when designing new infrastructure and repairing or maintaining existing infrastructure.				This policy was added for consistency with state and federal guidelines.



Tahoe Regional Planning Agency
128 Market St.
Stateline, NV 89449

March 22, 2017

Re: Comments on the draft Regional Transportation Plan update and associated Initial Study/Initial Environmental Checklist (IS/IEC)

Dear Ms. Beryl:

The Friends of the West Shore (“FOWS”) and the Tahoe Area Sierra Club (“TASC”) thank you for the opportunity to provide comments on the draft 2017 Regional Transportation Plan (RTP) update, Initial Study/Initial Environmental Checklist (IS/IEC), and related documents. The RTP lays out a multi-pronged approach to address transportation issues in the Basin, identifying the 2012 RTP’s focus as improving transportation and reducing vehicle trips within Town Centers,¹ the 2017 RTP’s focus as addressing transportation within the Region, (e.g. from community centers to other community centers),² and the 2021 RTP’s focus as reducing regional transportation impacts (e.g. travel from Northern California and Nevada to and from the Basin).³

The 2017 RTP includes many positive measures and approaches that will be important in addressing Tahoe’s transportation impacts. The 2017 RTP also clearly explains the different approaches and management strategies spanning from *within* community centers, *among* centers, and travel to and from the Lake Tahoe Basin, all of which play an important role in Tahoe’s transportation system. New technology also provides promising options to further improve transportation planning. However, we have several concerns and recommendations regarding the RTP update and associated IS/IEC (detailed comments follow):

- The 2017 RTP includes no modifications to ensure existing traffic problems are not exacerbated;
- The 2017 RTP IS/IEC does not adequately consider the traffic increases associated with post-2012 RPU amendments, recently-approved projects adjacent to the Basin (e.g. Squaw Valley and Martis Valley area Specific Plans), conversions of single-family

¹ “The priorities of the 2012 Regional Transportation Plan began by creating walkable, bikeable community centers to better address Everyday Tahoe travel needs.” (RTP, p. ES-5)

² “Instead, the first need is the foundation of a seamlessly interconnected, well-functioning transportation system within the Region to assure travel options and easy movement once people arrive. The priorities of this 2017 plan’s transportation infrastructure, programs, and management activities will implement this foundation. They encourage the use of multi-modal options to increase the efficiency, capacity, and flexibility of what is fundamentally a fixed regional transportation system.” (RTP, p. ES-3)

³ “With a clearer understanding of the number and types of users and their travel needs and patterns, the time is ripe to raise and resolve the issue of regional funding so the Lake Tahoe Region is well-positioned in 2021 to chart a clear path to buildout of the transportation system that assures continued preservation of the environment, quality of life for residents, and a high-quality experience for the millions of people who travel to Lake Tahoe each year.” (RTP, p. ES-11)

homes to vacation rentals, capacity-expanding highway projects, and other existing conditions not addressed in the 2012 analysis;

- Vehicle impacts associated with entry/exit visitor traffic on public health and safety are not adequately discussed;
- Recent increases in traffic from visitors exiting the Basin on peak congestion days are not reflected by the 2014 baseline year (used as the existing conditions for the environmental analysis) and total traffic has increased.⁴ Recent increases also reflect a larger problem that has not been adequately addressed by the 2017 RTP wherein our transit systems are not keeping up with the increases in development and visitor growth;
- Aggressive measures and/or political efforts to pursue more effective measures to reduce visitor entry/exit traffic need to be pursued immediately and not delayed until 2021.⁵ Political efforts need to be initiated very soon as it will take time to garner political support for legal and regulatory changes for such measures (e.g. road toll/user fee). The 2017 RTP fails to discuss and require specific actions to achieve this goal;
- The RTP does not provide a plan to review successful measures in other areas or a plan to acquire adequate funding to cover transportation needs, although funding remains the biggest impediment to implementing an adequate transit network, and options to address the funding shortfalls are not adequately considered (e.g. road toll/user fee); and
- A list of potential local funding measures has not been provided to jump start local conversations about solutions to Tahoe's transit problems, despite the forty year gap since initial solutions were initially discussed in the mid-1970s.

To address these concerns, we recommend the following:

1. Adopt the “no new net VMT increase” concept proposed by the League to Save Lake Tahoe (this is not a building moratorium, but rather a requirement that future projects include adequate measures to avoid increasing VMT); in addition, we recommend that future special events or temporary activities be prohibited from increasing vehicle trips during peak periods;
2. Adjust the IS/IEC data to account for the potential increases in traffic from the following and adjust planning accordingly:
 - a. The Village at Squaw Valley and Martis Valley West Parcel Specific Plans;
 - b. Post-2012 RPU amendments;
 - c. Existing and future conversions of homes to vacation rentals which serve as additional de-facto Tourist Accommodation Unit (TAU) uses that are not addressed by the RPU’s cap on TAUs; and
 - d. Highway expansion projects that will result in additional VMT, including the State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge Bypass) and the South Shore Community Revitalization Project (aka “the Loop Road”).

⁴ “Ms. Maloney said the traffic counts have started to trend upwards in the past three or four years.” (TRPA GB 2/22-2/23/2017, Minutes, p. 8)

⁵ “By first creating a seamless in-region transportation system, by the next update in 2021, partners can direct more action emphasis to providing effective travel options for visitors entering and existing the Region.” (RTP, p. 1-15)

FOWS & TASC Comments on draft 2017 RTP and RTP IS/IEC

3. Although a quantitative assessment of existing conditions (as reflected by the traffic increases in 2015 and 2016, especially for visitors exiting the Basin) may not be possible due to the need to select a baseline year to represent the existing conditions for the environmental analysis, the RTP update and IS/IEC should include a discussion of recent traffic impacts and, at minimum, a qualitative comparison to the 2014 baseline data;
4. In addition to stronger parking management strategies to more effectively manage existing parking, the RTP should incorporate policies which do not allow for increases in parking spaces while incentivizing the removal of existing parking spaces; and
5. The RTP should include a robust discussion of more aggressive traffic-reducing and funding mechanisms, including a road toll/user fee (which would not only help reduce the funding shortfall for future transit needs, but also to discourage personal vehicle use) and a focused effort to utilize Adaptive Roadway Management (currently listed on the RTP's "unconstrained" list).

Detailed comments regarding these concerns and recommendations are attached. In addition, we hereby incorporate the 3/20/2017 comments submitted by the League to Save Lake Tahoe (LTSLT), including but not limited to concerns regarding the RTP's reliance on other documents which are not yet available for public release (e.g. the Long Range Public Transit Plan and Corridor Plans). We would be happy to meet to discuss these comments. Please contact Jennifer Quashnick at jqtahoe@sbcglobal.net or Laurel Ames at amesl@sbcglobal.net if you have any questions.

Sincerely,



Susan Gearhart,
President
Friends of the West Shore



Laurel Ames,
Conservation Chair
Tahoe Area Sierra Club



Jennifer Quashnick,
Conservation Consultant

Adopt a “no net VMT increase” amendment:

New projects:

As proposed by the LTSLT,⁶ we recommend TRPA immediately adopt a “no net VMT increase” policy so that existing transportation problems are not made worse in the immediate future while the agency leads efforts to examine better planning mechanisms (e.g. the Transportation Measures Working Group) and to implement the 2017 RTP policies (which include mitigating traffic impacts from new, expanded, or revised developments or land uses⁷). The proposed amendment would not be a moratorium on new development; rather, it would require future projects and plans to include adequate measures and project adjustments to ensure additional traffic impacts are not generated through measures which may include:

- Parking fees paid by business owners and/or developers that are used to support transit (which may involve business owners charging their customers for parking to collect such fees);
- Transit subsidies;
- 1:2 offsets for new parking spaces; and
- Incentives for passengers using Lyft, Uber, taxis, shuttles, etc.

As the RTP tiers from the 2012 Regional Plan Update (RPU), we recognize that certain recommendations may require associated RPU amendments.

New events and temporary activities:

Events which draw a substantial number of new vehicles during peak periods have been approved in recent years, further exacerbating roadway conditions during times that traffic congestion is already a problem (i.e. Snowglobe in the City of South Lake Tahoe over the New Year’s Eve Holiday).⁸ Increases in vehicle trips during peak periods associated with events and other potential temporary activities should be prohibited unless and until a comprehensive and effective transit system which reduces vehicle use by visitors entering and exiting the Tahoe Basin is successfully implemented. As noted for new projects, this is not suggesting that new events be denied, but rather that strong measures are included to prevent increased peak vehicle trips. Additional measures to reduce peak trip generation should also be employed for events that have already been approved and create or contribute to peak roadway congestion, such as the Snowglobe festival⁹ and Annual Celebrity Golf Tournament at Edgewood Golf course.¹⁰

⁶ Concept proposed in 12/12/2016 written comments on 2015 Threshold Evaluation Report and reiterated by Shannon Eckmeyer, Esq., during the 3/8/2017 APC hearing.

⁷ “Policy 1.3: Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses by prioritizing projects and programs that enhance non-automobile travel modes.” (RTP, p. 2-3)

⁸ “Although an estimated 10 million cars enter the Region annually, congestion is not always the result. Peaks in travel are experienced at specific locations during holiday weekends, for special events, and on high snowfall days.” (RTP, p. 3-4) [Emphasis added]

⁹ <http://snowglobemusicfestival.com/>

¹⁰ <https://americancenturychampionship.com/tournament-information/schedule-of-events/>

We recommend TRPA immediately consider and approve the proposed “No net VMT increase” policy for projects, and that it be applied to redevelopment and conversions of uses that increase vehicle use in addition to all new development. We also recommend TRPA adopt similar requirements which prohibit increased vehicle trips during peak periods associated with new and/or expanded future events and temporary activities.

Revisions and new information requiring analysis:

RPU Amendments:

Amendments to the RPU (including Area Plan approvals) have resulted in land use changes that are likely to increase traffic compared to existing conditions. For example:

- The environmental review performed for the January 2015 TRPA Code amendment to allow conversions of Commercial Floor Area (CFA) to Tourist Accommodation Units (TAUs)¹¹ did not adequately address the net regional increased vehicle trips that may result;
- The Placer County Tahoe Basin Area Plan¹² adopted in January 2017 allows for additional conversions of TAUs in Placer County without having accounted for the *local* impacts of additional TAUs and TAU morphing¹³ (the final EIR’s response to comments does not address this specific issue¹⁴);
- Regulations allowing TAU “morphing” continue to allow for net increases in vehicle trips that have not been accounted for in environmental impact analyses;¹⁵ and
- A significant number of large single family homes have been or are being converted/used as vacation rentals without being counted under TRPA’s cap on Tourist Accommodation Units (TAUs) consistent with the analysis in the 2012 RPU EIS/RTP EIS/R; as a result, the impacts of these de-facto TAU units have not been counted.

We recommend the IC/IEC analysis be revised to reflect the potential increases in traffic associated with the conversions of uses (e.g. commodities as well as single-family homes converted to de-facto TAUs, etc.), and the morphing of TAUs (based on the RPU’s definition of TAU size compared to the size of existing ‘transferred’ units¹⁶). The 2017 RTP analysis in the IC/IEC builds on the 2012 RTP analysis and 2015 Threshold Evaluation Report, which include assumptions regarding the transfer of such units, estimates regarding the number of existing and bonus units, and potential future units.¹⁷ This information can be used to assess the potential increase in the number of overnight accommodations (e.g. the number of

¹¹ Ordinance No. 2016-01, adopted 1/27/2015, Revisions to Chapter 50.10.8.

¹² <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

¹³ FOWS & TASC comments on DEIR/S, included in TBAP Final EIR/S on p. 3.3-37 to 3.3-40; response provided on p. 3.3-141

¹⁴ Discussed in FOWS & TASC comments on final TBAP EIR to RPIC, 11/14/2016, p. 5-7 (attached)

¹⁵ See detailed comments in 4/21/2015 FOWS comments to the Regional Plan Implementation Committee (attached)

¹⁶ “Provided the conditions in subparagraph 1. above are met, 80 percent of the tourist accommodation units on the receiving site may be up to 1,200 square feet, with kitchens, and no more than 20 percent of the project’s floor area may contain units not to exceed 1,800 square feet, with kitchens.” (TRPA Code 51.5.2.K)

¹⁷ 2012 RPU DEIS, Appendix E, Part 7; 2015 Threshold Evaluation Report, Chapter 12.

‘bedrooms’ – which better reflect the overnight capacity of the units - rather than the number of TAUs) compared to existing conditions

The RTP (and RPU) should also include specific requirements for future project-level environmental impact analyses to compare the existing number of bedroom units associated with a sending unit(s), a single-family home that is being converted to a vacation rental use, and/or the CFA that is being used to develop the TAU (through the conversion allowances in the RPU and TBAP), to the post-project number of bedroom units and the associated increase in vehicle trips and other environmental impacts. For example, the RPU/RTP could include Code requirements for future project analyses to include a comparison of the existing number of bedroom units to the proposed number of bedroom units and to disclose and mitigate the associated human and vehicle population increases.

As noted in the 3/20/2017 comments submitted by the LTSLT, conversions of single-family homes to de-facto TAUs need to be regulated by TRPA. The current lack of regulation allows for growth beyond what was analyzed in the 2012 RPU EIS.

Impacts from projects in Squaw Valley and Martis Valley:

It is unclear whether the IS/IEC incorporates the most recent estimates included in the Village at Squaw Valley Specific Plan (VSVSP) EIR¹⁸ and Martis Valley West Parcel Specific Plan (MVWPSP) EIR.¹⁹ Appendix D discusses efforts taken to match forecasts with entry volumes modeled by adjacent MPOs,²⁰ however the document does not appear to include the more recent estimates of the additional in-Basin traffic that will be generated by these two projects (although the forecasts of potential traffic in both EIRs underestimated peak unit occupancy, as noted in numerous public comments on each EIR).

We recommend the IC/IEC be revised to incorporate the most recently available information regarding vehicle trip impacts from these adjacent Specific Plans, accounting for actual peak occupancy rates (rather than the reduced occupancy used in the associated EIRs), and/or if these impacts are reflected in the forecasts, the IC/IEC should be revised to clarify this.

Local VMT:

As noted in our comments on the TBAP (see excerpt from 12/1/2016 letter to APC; attached), the 2015 Threshold Evaluation Report includes data showing that VMT has increased in the North Shore and decreased in the South Shore.²¹ As documents continue to review significance based solely on the “regional” VMT standard, impacts at the local scale are not being adequately

¹⁸ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/villageatsquawvalley>

¹⁹ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/martisvalleywestparcel>

²⁰ “To reflect the potential growth along the two north entry-corridors, TRPA staff made slight adjustments to the hotel-motel occupancies as well as to beach attractiveness factors to influence greater day-use visitation from the two projects along the SR 89 and SR 267 corridors. The purpose of the analysis was intended to match the forecasted entry volumes forecasted in the Squaw and Martis Valley analyses to be commensurate with the forecasted model values. The comparison of TRPA modeled traffic entry volumes and the modeled entry volumes by adjacent metropolitan planning organizations is shown in Table D.17, below.” (draft RTP, App. D, p. D-26)

²¹ Table 12-15.

addressed. The 2017 RTP fails to discuss this distinction, and the IC/IEC includes no analysis of these local impacts. Although TRPA has initiated review of the VMT standard beginning with the formation of the Transportation Measures Working Group (as well as the Threshold Update Strategic Initiative process), the environmental impacts of the RTP occur on localized scales and should be analyzed and disclosed as such.

We recommend the RTP include more discussion of the differences in transportation impacts and trends in the north/west shore versus the south/east shore areas of the Basin (at a minimum, as we understand more analysis will be required in order to select appropriate boundaries), and that future projects and plans be required to evaluate these impacts separately. The proposed “No new VMT/vehicle trips during peak periods” approaches discussed previously should be evaluated based on both the regional and local scales.

Existing conditions (2014 baseline year):

The IC/IEC relies on 2014 as the baseline year to represent existing conditions for transportation. As noted previously, we understand that the year chosen to represent existing conditions cannot be a moving target and the analysis process began well over a year ago, however we are concerned that recent increases in traffic (beginning in 2015 through the present) are not sufficiently reflected by the 2014 baseline year (the LTSLT notes similar concerns in their 3/20/2017 comments). The 2016 TBAP EIR/S (released over eight months before the RTP IC/IEC) included updated 2015 estimates regarding VMT,²² however no similar process was done for the 2017 RTP analysis. Further, 2015 traffic counts within the Basin should be available from the state departments of transportation (e.g. 2015 California Department of Transportation traffic counts²³ and Nevada Department of Transportation VMT estimates²⁴ are already available online) and 2016 traffic counts should also be obtained, where available.

At a minimum, the IC/IEC should include the most recent transportation data available and discuss how it compares to the 2014 baseline conditions as well as trends in the Basin beginning in 2015. Further, the IC/IEC analysis and subsequent RTP requirements should include an additional ‘cushion’ wherein the plans account for more traffic than is represented by the 2014 baseline in order to err on the side of caution. For example, if recent traffic counts reveal a 3% increase in VMT (and/or peak trips),²⁵ the RTP should be adjusted so that it incorporates additional traffic reduction measures to address the additional 3% VMT (and/or peak trips) compared to what is represented in the 2014 baseline. In other words, if the 2017 RTP calls for a 7% reduction in traffic from the 2014 baseline year, but traffic counts from 2015 indicate traffic has increased by 3%, then the 2017 RTP should plan to ensure a 10% reduction in traffic, not 7%. This analysis should separate local and regional impacts, such that increases in one part of the Basin are addressed even if traffic has decreased in other areas of the Basin.

²² Placer County Tahoe Basin Area Plan and Tahoe City Lodge Final EIR/EIS, p. 3.1-5 and 3.1-6.

²³ <http://www.dot.ca.gov/trafficops/census/>;

²⁴ <http://www.nevadadot.com/home/showdocument?id=4436>

²⁵ Numbers in these examples are hypothetical.

Traffic-related impacts to public health and safety:

“Visit Tahoe” Category and peak exit congestion:

Peak visitor traffic primarily exiting the Tahoe Basin has become increasingly problematic in recent years,^{26,27} resulting in hours-long traffic jams²⁸ that effectively block roadways which have traditionally provided a means for emergency access. The RTP categorizes this traffic within the “Visit Tahoe” category, reporting that these trips account for 25% of the daily vehicle trips in the Basin.²⁹ However, the greatest impact from vehicles in this category occur on Sundays/Holidays, days after events, or heavy snow periods (as cited previously), thus the average daily vehicle metric does not appear to sufficiently reflect the source of these vehicle impacts (e.g. resident/commuter, recreation, or visitor).

We request the 2017 RTP also identify what proportion of the “Sunday/Holiday” gridlock exiting the Basin is associated with this class of drivers, as we anticipate it is far greater than 25% on affected peak days and such information is important to understanding the environmental and public safety impacts from these vehicles.

Measures to reduce peak exiting visitor traffic:

Entry/exit traffic is identified as a significant public concern.³⁰ Congestion is noted as a primary consideration for the 2021 RTP to address (although the 2012 RPU amendments and the 2017 TBAP allowed for even more congestion by permitting more degraded Level of Service [LOS] conditions).^{31,32} While extensive gridlock on peak days is currently a major public health and safety concern, the 2017 RTP does not adequately consider immediate actions to help mitigate these impacts or include specific and enforceable short- and long-term actions that can be taken to ensure emergency access is available when needed, although the RTP notes the importance of evacuation plans.³³ We recognize this will require coordination with public service entities, however the 2017 RTP should include specific actions TRPA can implement and related performance measures. Notably, the 2007 Angora Fire started on a *Sunday* morning and advanced swiftly. Had the roadways in that neighborhood been congested as they have been over

²⁶ <http://www.sacbee.com/news/local/article129393194.html>

²⁷ <http://southtahoenow.com/story/03/10/2017/city-county-state-and-law-enforcement-officials-meet-discuss-tahoe-traffic-jams>

²⁸ <http://southtahoenow.com/story/03/05/2017/heavy-traffic-south-lake-tahoe-city-advising-motorists-stay-town-longer>

²⁹ “...Visit Tahoe, the long distance trips to and from the Region, by visitors and commuters accounting for 25 percent of daily vehicle trips.” (RTP, p. 1-14)

³⁰ “Multiple themes and goals generated from the public are integrated into Linking Tahoe...Increasing quality-of-life and environmental benefit through reducing the high numbers of cars arriving and leaving the Region at the same time.” (RTP, p. 2-9)

³¹ Policy T-10.7: “These vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users.”

³² “In recognition of the LOS conditions in the Tahoe City Town Center, Area Plan Alternatives 1 through 3 would revise the LOS standards to allow LOS F during peak periods in town centers (Area Plan Policy T-P-6).” (TBAP DEIR/S, p. 10-16)

³³ “Wide-scale evacuation plans for the Lake Tahoe Region are necessary to address possible large-scale security incidents and natural disasters such as fires, earthquakes, and tsunamis.” (RTP, p. 3-34)

the past two years, the situation could have been far more dire. As noted below, more needs to be done now to set the stage for aggressive measures that can reduce vehicle travel to and from the Basin (e.g. the road toll/user fee approach and out-of-basin parking lots with shuttles [more details provided below]).³⁴

The 2017 RTP should discuss existing actions and efforts that are being taken to help address emergency access through neighborhoods associated with the “Sunday/Holiday” gridlock from visitors leaving the Basin (for example, El Dorado County Supervisor Sue Novasel recently explained the development of a “traction ordinance” related to chain requirements that will increase the authority to control chain requirements on county roadways³⁵).

The RTP should also explore additional options that can be taken in the interim during these peak conditions to improve emergency access, as well as initiate clear and aggressive efforts to pursue additional traffic-related measures, such as the Adaptive Roadway Management option (discussed more below).

Road tolls/user fees:

The concept of a Basin entry fee/road toll has been discussed in TRPA documents for over forty years.³⁶ Such a fee could provide much-needed funding for public transit (as discussed below, funding is one of the biggest impediments to a more effective system and funding shortfalls are substantial³⁷) as well as disincentivize the use of personal automobiles for traveling to the Basin³⁸ and incentivize carpooling, public transit use, and other ride-sharing concepts among visitors, thereby reducing traffic impacts to the environment and public health and safety. We understand TRPA has been working with the Trans-Sierra and Mega-region partners,^{39,40} however such efforts are long-term, and while improved regional transit to and from the Tahoe

³⁴ This concern was expressed by Board member Shelly Aldean during the 2/23/2017 annual retreat.

³⁵ <http://www.tahodailytribune.com/news/gps-savvy-tourists-clogging-lake-tahoe-residential-streets/>

³⁶ “The CTRPA plan also recommends a basin user fee (a concept developed by TRPA) to finance the multi-modal transportation systems in the Basin.” (Draft EIR, Regional Transportation Plan Update, February 1976. California Tahoe Regional Planning Agency. Page 95)

³⁷ “That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system.” (RTP, p. 4-3)

³⁸ “Road user fees could be imposed in a variety of different ways that comply with Compact restrictions—for instance, as a congestion toll within the Region, or as a parking fee. This would provide a cost disincentive to driving and a cost incentive to utilizing the intercept lots and shuttles.” (TRPA RPU FEIS, Volume 1, p. 3-462)

³⁹ “The Trans-Sierra Transportation Coalition is a group of 11 California and Nevada counties, federal and state agencies, stakeholders, and citizens from Northern California and Northern Nevada committed to ensuring that the transportation system in the greater Trans-Sierra Region supports economic vitality and preserves an excellent quality of life. Mega-Region partners currently collaborating with the Tahoe Region include but are not limited to Washoe Regional Transportation Commission, Carson City Metropolitan Planning Organization and Sacramento Area Council of Governments.” (RTP, p. 2-6)

⁴⁰ “Coordination is already underway to identify solutions and prepare to implement more frequent and convenient connections between Lake Tahoe and northern California and Nevada cities including Truckee, Reno, Sacramento, Bay Area, Stockton, and Auburn. Concepts for new rail and transit services with transit centers that incorporate park and ride lots are being developed and are included on the plan’s unconstrained, unfunded project list. Through continued work with the Trans-Sierra Transportation Coalition these strategies will be refined and poised for inclusion and implementation through the 2021 RTP.” (RTP, p. 2-6)

Basin is a necessary part of providing an alternative to automobile use, incentives alone will not likely be enough; a road toll/user fee would help disincentivize the use of the private automobile. In fact, the 2012 RPU response to comments on the Final EIS specifically outlines the authority TRPA has to implement this measure (Volume 1, p. 3-462 to 3-463; excerpt attached). TRPA Governing Board members have also recently raised this option, noting that it would be best to begin efforts sooner rather than later as it will take substantial time and collaboration to implement such a measure.^{41,42}

Sufficient information exists to show the nexus between vehicle use and impacts to Tahoe's roadways and environment. Further, a substantial proportion of Tahoe's visitors come from the Bay Area and other places in California where roads commonly have tolls on them.⁴³ This is not a new or innovative concept. The idea of charging road tolls/user fees to enter natural recreational areas is also not new – National Parks already implement such an approach (although Lake Tahoe is not a designated National Park, the Basin's significance as a natural resource and status as a federally-designated Outstanding National Resource Water prove Tahoe's special status is undisputable).

We ask the TRPA to immediately and aggressively pursue the road toll/user fee option. The 2017 RTP should include a timeline for interim milestones related to implementing this approach.

Adaptive Roadway Management:

The 2017 RTP identifies Adaptive Roadway Management as an option to assist with travel during peak periods; this approach may also be combined with priority transit services to incentivize the use of public transit.⁴⁴ However, the 2017 RTP notes that additional funding

⁴¹ “Ms. Aldean said if there were no impediments, toll booths would be the solution to regulate the number of people in the Basin. Toll booths will take some legislative action but should be considered.” (2/22/2017 GB meeting minutes, p. 9)

⁴² E.g. “Ms. Aldean suggested including a Basin user fee in the range of options for the survey. It will [be] complicated and will require political will and some Legislative changes. If there is an appetite for people who live in the Basin or just outside the Basin to impose an entrance fee into the Basin, it would be a long term source of funding and is a solution to the increased popularity of Tahoe as a destination resort. Now is the time to start having this discussion. Surveying the residents who live in the Basin would be the first step. It needs to be included as a funding option and also for the long term, they need to find funding sources or an endowment. Mr. Sass suggested in the past that the Board needed to start using their political influence amongst the Board members to get the...user fee rolling down the track. He does not believe the portfolio approach will work, locals and the counties are not going to approve a tax to fund transportation in the Basin. There would need to be caveats on the user fee, but in lieu of that it is the simplest and easiest solution.” (2/23/2017, GB meeting minutes, p. 23-24)

⁴³ i.e. “The majority of visitors to North Lake Tahoe make a three-hour (or less) drive on I-80, from the Sacramento and San Francisco Bay areas. These account for 71% of winter visitors and 68% of summertime visitors.” (Trans Sierra Transportation Plan, March 2015)

⁴⁴ “Another example is prioritizing roadway access for transit and active transportation during peak times at peak locations to manage congestion and encourage less impactful travel methods. Adaptive roadway management on U.S. Highway 50, SR 89, and SR 267 would significantly improve entry and exit congestion during high peak visitation seasons and visitation at high-use recreation destinations.” (RTP, p. 3-31)

sources and collaboration will be necessary to implement this option,⁴⁵ and it is included in the “unconstrained” project list.⁴⁶

We request that Adaptive Roadway Management be prioritized among transportation projects and implemented as soon as possible (we herein reference the LTSLT’s 3/20/2017 detailed comments and recommendations). In the meantime, no new projects or events which will increase peak hour vehicle trips into and out of the Basin should be approved (regardless of whether the no VMT/vehicle trip increase measures previously discussed are included).

Parking:

The IC/IEC concludes the RTP’s impact on parking would be less than significant and explains that future project-level reviews are expected to address individual project impacts.⁴⁷ However, parking impacts are both a local and regional problem and require more extensive coordinated planning than can be provided project-by-project. In addition, as noted by transportation expert Greg Riessen, PE (in comments submitted by the LTSLT [cited throughout]), each additional parking space constructed means more VMT and congestion and resulting air and water pollution (excerpt below), yet the RTP’s policies do not call for a *net reduction* in parking spaces.

“Fundamentally, imposing a minimum parking requirement is the equivalent of requiring existing and new development to generate Vehicle Miles Traveled (VMT) and exacerbate traffic congestion. Each additional parking space constructed deepens the hole of air and water quality impacts that the Tahoe Basin is trying to climb out of. The report confirms this connection on page 57: “It is in the public interest to minimize parking wherever possible in order to...encourage non-auto transit modes.” However, there is no mention of VMT in the report, specifically, the relationship between parking and VMT. This document should describe how minimizing the parking supply serves to reduce VMT and addresses the TRPA’s VMT threshold, while increasing parking supply will increase VMT and undermine threshold attainment. Similarly, there is no mention in the report of the relationship between increased parking supply and worsened traffic congestion.” (12/9/2016 LTSLT comments on final TBAP DEIR/S, from transportation expert Greg Reissen)

Mr. Reissen’s 12/9/2016 comments also note that there is not a lack of existing parking spaces, but rather a lack of parking *management* (the latter concept is discussed substantially in the 2017 RTP⁴⁸). What should be gleaned from this information is two-fold:

⁴⁵ “However, adaptively managing the Region’s entry and exit roadways, U.S. 50, SR 89, and SR 267, cannot be realized without new funding sources, and agency collaboration and buy-in (unconstrained project list).” (RTP, p. 3-36)

⁴⁶ See “Table 3.2: Transit Services: Existing, Constrained and Unconstrained.” (RTP, p. 3-14)

⁴⁷ “8. Would the project result in changes to existing parking facilities, or demand for new parking?...As discussed in Chapter 2 of the 2012 RTP/SCS EIR/EIS, the 2012 plan would include projects that have the potential to increase parking demand, but would also include projects that would decrease the demand for parking and projects that would increase or improve parking facilities. Individual transportation projects would be subject to, or are currently undergoing, project-level environmental analyses to determine project-specific impacts of each project, including providing adequate parking for those projects that would increase demand. This would also be the case with the 2017 RTP/SCS. This impact would be less than significant.” (IC/IEC, p. 58)

⁴⁸ “Parking Management: The price and availability of parking has a significant impact by shaping how people decide to travel. Where parking is free, disorganized, or un-enforced, as it is along the Region’s state highways which provides access to many of Tahoe’s most popular recreation areas, roadsides can become crowded with parked cars. This uncontrolled parking leads to issues with roadside erosion and public safety. Where parking is

- 1) Additional parking spaces should be discouraged/prohibited and existing parking spaces reduced in order to reduce vehicle use (this does not mean new or redevelopment projects would not be allowed to construct new spaces in their project areas, however a system could be in place to ensure spaces elsewhere are reduced, just as there are coverage and other commodity transfer programs); and
- 2) It is more effective to better manage existing parking spaces to address peak needs rather than simply construct additional spaces.

The LTSLT's 3/20/2017 comments on the draft 2017 RTP also discuss the need for improved parking management and for adherence to the 2012 RPU's more aggressive reductions in parking minimums, and include additional comments from Mr. Reissen (incorporated herein). We support the 2017 RTP's focus on "parking management" as part of its strategy,⁴⁹ however, there is no mention of *reducing* the number of parking spaces in the Basin. At best, the RPU and subsequent Area Plans may strive to reduce the number of *new* spaces compared to previous minimum parking requirements⁵⁰ – but this still means *additional* parking spaces will be constructed. Further, there are many other options for parking management which can address parking needs, reduce vehicle use, and incentivize transit use⁵¹ that have not been incorporated into Area Plans or the RPU but can and should be included in the 2017 RTP.

perceived as free and unlimited people are less likely to use transit to access those areas or pay for parking in a safer more organized location. Successful parking management strategies help disperse where and when people travel. Parking strategies are dependent on the location and use of an area. For recreational areas, strategies could include combinations of no time limit parking lots with higher prices, limited and short-term roadway parking with medium prices, and free shuttle service. Through corridor planning, TTD and land management partners are exploring parking strategies that support improved access to recreation areas. These include a pilot project to test parking pricing along Tahoe's East Shore. This project will also explore using technology to let travelers know about the availability and price of parking in the area via smart phones, online, or changeable message signs." (RTP, p. 3-11 to 3-12)

⁴⁹ i.e. "Transportation system services and programs can respond to these varying conditions with dynamic traffic and parking management, diverse seasonal public transit services, real-time travel information, and incentives to use public transit, mobility hubs, bicycling and walking trails, and zero-emission electric vehicles." (RTP, p. 1-17); and as discussed during the 2/22/2017 TRPA GB hearing: "Mr. Haven said the Regional Transportation Plan wants to create an incentive and disincentive program to drive transit usage. As the programs are implemented and the tracking of ridership is done then that could be a future discussion...Mr. Cashman asked what types of incentives and disincentives are they considering...Ms. Beryl said parking management, dynamic pricing, and limitations of parking in certain areas..." (2/22-2/23/2017 GB meeting, minutes, p. 6)

⁵⁰ Response to comment number 12-42 in the TBAP FEIR/S: "The comment pertains to parking, both for the Area Plan and for the Tahoe City Lodge. Regarding Area Plan parking impacts, the actual parking demand and supply would depend on specific project projects, their design, and future land uses at a finer level of specificity than can be identified in the Area Plan (as specific types of commercial land uses, for example, have differing levels of parking demand), future shared parking arrangements, the degree to which future developers take advantage of in-lieu fee programs, and other factors. As a result, it would be speculative to identify a specific number of future parking spaces that would be needed or supplied. What can be concluded at a plan level of analysis is that the parking standards that would be adopted as part of the Area Plan would result in a lower number of additional future parking spaces in town centers associated with new development than would occur if the new parking standards are not adopted. (TBAP FEIR/S, p. 3.3-150) [Emphasis added]

⁵¹ Examples were provided by Mr. Reissen in the 12/9/2016 comments previously cited.

In addition, we support the 2017 RTP's policy to focus on improved transportation strategies, including parking management, for popular recreation sites,⁵² however the RTP should include a policy to prohibit additional parking spaces associated with expansions of existing recreational facilities (for example, the proposed expansion of the Lake Tahoe Golf Course into the Washoe Meadows State Park is likely to include a substantial number of new parking spaces). As noted above, this does not mean no new spaces could be constructed at a project site, however spaces would have to be reduced elsewhere in the project's vicinity (taking location and site-specific issues into consideration).

Funding:

Funding has been one of the primary impediments to implementation of a sufficient transportation system for decades.⁵³ The RTP notes that additional dedicated funding sources are necessary to achieve the long term vision, and that TRPA and partners will be working to identify such sources over the next four years.⁵⁴ Funding problems are exacerbated by the potential for existing funding levels to drop.⁵⁵ The RTP currently estimates a shortfall of \$3.8 billion in funding for the full transportation vision.⁵⁶ As just \$2 billion in funding is forecast over the next 23 years (assuming no reduction in existing levels),⁵⁷ this means funding will almost have to *triple* to achieve the full network. Without adequate funding, transportation networks cannot be sufficiently improved and existing problems will likely only get worse, especially as the populations of the Northern California and Nevada "Mega-Regions" grow by millions.⁵⁸

⁵² Policy 5.2: Provide multimodal access to recreation sites. Encourage collaboration between public lands managers, departments of transportation, transit providers, and other regional partners to improve year-round access to dispersed recreation activities. Strategies could include active transportation end-of-trip facilities, transit services, parking management programs, and incentives to use multi-modal transport. (RTP, p. 2-16)

⁵³ "This 2017 plan is a blueprint for a regional transportation system that also begins to address inter-regional travel demand. To achieve the long-term vision, TRPA and partners will need to collaborate to identify and source dedicated regional revenue sources to meet the larger need of comprehensive bus and rail service coupled with park and ride lots that will provide options to private vehicle use. This policy debate has been ongoing since the 1990s without resolution." (RTP, p. 4-3) [Emphasis added]; also see previous cite to 1976 CTRPA RTP DEIR: "The CTRPA plan also recommends a basin user fee (a concept developed by TRPA) to finance the multi-modal transportation systems in the Basin." (p. 95)

⁵⁴ "Now with a clearer understanding of the size of the demand, the time is ripe to engage the matter of regional funding. While we move forward to build seamless transit and active transportation systems within the Lake Tahoe Region, over the next four years TRPA and partners have the opportunity to identify new funding streams and be poised in 2021 to fully support the build out of the transportation system's long-term vision. This is necessary to ensure the preservation of the environment, residential quality of life, and quality experience for the millions of people who travel to the Lake Tahoe Region." (RTP, p. 4-3)

⁵⁵ "The estimated levels of future funding by the various transportation agencies within the Region assume that future federal and state funding will mirror historic levels. There is no guarantee that this will occur and the estimated shortfalls may increase dramatically if our state and federal partners cannot sustain current levels of investment into the future." (Trans Sierra Transportation Plan, p. 29)

⁵⁶ "The total amount of funding needed to deliver the constrained and unconstrained projects, operations, and programs for the life of this plan is just over \$5.8 billion. That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system." (RTP, p. 4-3)

⁵⁷ "An estimated \$2 billion in revenue is anticipated over the 23-year forecast period." (RTP, p. 4-3)

⁵⁸ "The wide open spaces and attractions of the Trans-Sierra Region straddle what has been dubbed the Northern California megapolitan, the fast growing urban area stretching from San Francisco, through Sacramento, to Reno. The Northern California megapolitan is home to some 15 million people today, and this number is expected to

While efforts to garner adequate funding have been underway for decades, and the recent reclassification of the Tahoe Metropolitan Planning Organization (TMPO) to an urban MPO⁵⁹ may help Tahoe qualify for additional federal funding, this will still not be enough to cover the shortfall. Further, given Tahoe's relatively small year-round population, it is generally recognized as infeasible to place the cost burden for such a network on local full-time residents.⁶⁰ While "local self-funding" approaches may help raise a portion of these funds, the 2017 RTP recognizes that such approaches are insufficient.⁶¹ However, the 2017 RTP does not discuss the potential funding that could be required of corporations and other large businesses (e.g. Edgewood, Vail, etc.) to help subsidize the cost of transit. As noted in the LTSLT's 3/20/2017 comments, additional requirements and incentives for local employers are also an option.

We support TRPA's efforts to explore additional funding mechanisms, including the options listed in Chapter 4 of the RTP (e.g. regional dynamic pricing strategies), although these options will not be sufficient to address the \$3.8 billion funding gap. However, as noted previously, a road toll/user fee has the potential to raise substantial funding and will provide a clear nexus between the road toll/user fee and the expenditure on Tahoe's transportation systems. For example, the 2017 RTP notes that recent information indicates roughly 10 million vehicles travel to the Basin each year. If a road toll/user fee were applied to each vehicle upon entry to the Basin, funds raised could be as follows (this is an overly simplistic view that is only meant as a general example):

\$5 per vehicle = \$ 50 million/year; sum for 23 years = \$1.15 billion
 \$10 per vehicle = \$100,000 million/year; sum for 23 years = \$2.3 billion
 \$15 per vehicle = \$150,000 million/year; sum for 23 years = \$3.45 billion

Such options would clearly go a long way in raising the additional **\$3.8 billion** necessary to implement the full transportation vision.

We strongly urge TRPA to immediately and aggressively pursue a road toll/user fee option. Interim steps that could be incorporated into the 2017 RTP may include the formation of a Governing Board Committee to discuss political and other implications and associated solutions, and a technical working group to explore examples of how such a system may be installed and operated based on an examination of other locations where such road tolls/user fee systems are in place as well as coordination with other involved entities. TRPA could also undertake a Strategic Initiative to pursue this option.

increase by an estimated 25-30% by the year 2035. The natural beauty, yearround recreational opportunities, and solitude of the Trans-Sierra Region are a relatively short drive from these urban areas. This proximity makes the Region a key contributor to the overall quality of life for the millions that live and work in the Northern California megapolitan." (Trans-Sierra Transportation Plan, p. 9)

⁵⁹ "In February 2016, the FAST Act upgraded TRPA's status to an urban metropolitan planning organization, which requires TRPA to develop, establish, and implement a formal congestion management process." (RTP IS/IEC, p. 3-50)

⁶⁰ i.e. "Visitation far outstretches anything our permanent population can do." (Carl Hasty, TTD, 2/22/2017 GB hearing, minutes, p. 24)

⁶¹ "Local self-help funding is needed to match federal and state funds, but also require voter approval for initiation and renewal. These types of sources can levy relatively large amounts of funding, but are insufficient as the sole source that the Lake Tahoe Region relies on to achieve its long-term transportation vision." (RTP, p. 4-9)

Other recommendations:

Additional land use options:

As detailed in the Petition for Writ of Mandate (Petition) for the lawsuit recently filed by the California Clean Energy Committee (CCEC) against Placer County's approval of the Tahoe Basin Area Plan (TBAP),⁶² there are additional actions that could be taken to mitigate transportation impacts (and the associated greenhouse gas emissions, air and water pollution, noise, and public health and safety threats). Although the Petition focuses on Placer County's approval of the TBAP, the actions recommended in the Petition, as well as comments on the draft and final EIR/S submitted by CCEC, FOWS and TASC, and the League to Save Lake Tahoe,⁶³ are also representative of potential RPU/RTP amendments including additional measures to reduce transportation impacts (and related environmental impacts). These recommendations should be included in the 2017 RTP and evaluated in the IS/IEC.

Additional information:

According to the IS/IEC, surveys have been performed within the last four years to gather updated information regarding public views on transportation.⁶⁴ It is unclear what the questions were or what information was gathered, however we recommend the following information be obtained (or if it already has, we request this information be provided to the public and included with the RTP documents):

- What frequency of transit service to and from the Tahoe Basin would be necessary for a substantial number of visitors to use public transit into the Basin?
- How much of an incentive would be provided by priority access for transit during congested conditions (through Adaptive Roadway Management)?
- How many hours in gridlock is too many hours (recognizing many visitors deal with regular gridlock every work day)?
- What is the importance of a transit service which allows pets (in other words, how many pet owners would use transit if pet-friendly transit service options that provided convenient and frequent transit service were available⁶⁵)?
- What amenities are necessary to encourage use (e.g. bathrooms on the bus, Wifi, seat comfort, etc.)?
- What will it take to overcome the discouragement of using transit for visitors with substantial luggage/gear?
- What is necessary to encourage visitors with children to take transit?

⁶² <http://friendswestshore.org/wordpress/wp-content/uploads/2017/01/Verified-Petition-for-Writ-of-Mandate.pdf>

⁶³ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/tahoebasinap>

⁶⁴ "The policies, programs, and projects included in the 2017 plan have been vetted, modified and updated based on feedback received through multiple public and stakeholder workshops, surveys, and meetings held over the last four years. Over 800 people were engaged through qualitative and quantitative methods specifically for feedback on the 2017 RTP/SCS." (RTP IS/IEC, p. 2-1)

⁶⁵ This question stems from the 2017 RTP's reference to allowing dogs: "Hubs would be coupled with frequent transit that carries recreation equipment, luggage, and could allow dogs, with services reservable online." (p. 4-6).

- If these issues were addressed to visitors' satisfaction, what would their preference be with regards to getting from their homes to a location where they would board public transit to the Basin? For example, would park and ride lots be sufficient? Would such lots need to be manned for security to make users feel comfortable leaving their vehicles behind?

Although such survey questions would need to be determined by a professional in the field, these questions represent the type of information that would be important to assessing how to encourage visitors to use transit into and out of the Basin. Unfortunately, it is not likely to be an "if you build it, they will come" situation.

We request where such information has already been obtained, it be provided to the public and included with the 2017 RTP documents. Where such information has not been obtained, we recommend TRPA and partners conduct an appropriate survey of summer and winter visitors. We would also be happy to distribute surveys or other information to our members. In addition, we recommend TRPA gather similar information from transit networks in other locations where there is more successful transit use.

Conclusion:

In conclusion, we support the features of the 2017 RTP which will incentivize non-automobile modes of travel and increase public transit options, however we remain concerned that additional immediate actions are necessary to begin what is no doubt an intensive process to address some of the most impactful transportation problems in the Basin. It will be important for TRPA to take a strong leadership role to implement additional measures supporting adequate transportation funding, such as the road toll/user fee option. In the meantime, we also ask TRPA to adopt regulatory changes to prevent increases in VMT and peak vehicle trips associated with new projects and special and temporary events so that existing traffic problems are not exacerbated. We would welcome the opportunity to work with TRPA and other stakeholders to craft such policies and engage the public in their development.

2. VMT impacts:

The TBAP FEIR/S states cumulative regional VMT will increase even under the No Action alternative. As noted in our comments on the RPU EIS and TBAP DEIR/S (i.e. regarding changes such as conversions of CFA to TAUs), we do not believe the transportation analyses have sufficiently evaluated the TBAP's potential VMT impacts. Even if regional VMT were reduced by the RPU, this would still not address the local increases in VMT within the TBAP boundaries.

TRPA's RPU EIS deferred analysis of local impacts to the environmental analysis that would accompany the Area Plans.¹³ However, the TBAP fails to consider the local impacts, citing this is not necessary because the regional VMT standard would not be violated.¹⁴ TRPA's 2015 Threshold Evaluation Report (p. 12-27; see Table 12-15 below) shows an increase in traffic in the North/West area of the Tahoe Basin; notably, decreases in the South Shore appear to 'cancel out' the impacts of increased VMT in the north/west shore when only the regional VMT is considered.

Table 12-15. Change (Δ) in Daily Vehicle Trip Ends (DVTE) and Vehicle Miles Traveled (VMT)

Jurisdiction	2010	2011	2012	2013	2014	Total Δ by Jurisdiction
Douglas						
DVTE	800	1,259	-1,549	-2,732	3,724	1,502
VMT	3,200	11,353	-14,628	-12,649	15,082	2,358
Washoe						
DVTE	0	251	-892	-378	981	-38
VMT	0	6,171	-14,495	-1,908	6,565	-3,667
El Dorado						
DVTE	-1,500	4,200	-200	0	-7,900	-5,400
VMT	-5,643	13,935	-10,840	0	-33,866	-36,414
Placer						
DVTE	-800	1,000	-500	0	4,000	3,700
VMT	-4,040	14,477	-12,185	0	17,480	15,732
Annual Δ						
DVTE	-1500	6,710	-3,141	-3,110	805	-236
VMT	-6,483	45,936	-52,148	-14,557	5,261	-21,991
Notes: Based on traffic counts collected by Caltrans and NDOT. VMT is calculated by TRPA using average trip length, survey data and modeling. Source: TRPA, Caltrans and NDOT Annual Traffic Count Programs						

It is contrary to CEQA for TRPA's RPU to defer local impact analyses to future area plan reviews and then for subsequent area plan reviews to fail to perform local analyses because the RPU concluded regional standards will be met. This begs the question – if neither the RPU or area plans will address improvements to local traffic impacts compared to existing conditions, then when will this occur? Traffic is a regional and areawide issue, just as many solutions are also most effectively implemented at the regional and areawide scale (i.e. improved transit programs require coordination and implementation at a larger scale). Skirting this issue and

¹³ Noted in our NOP and DEIR/S comments.

¹⁴ “As described above, the Draft EIR/EIS clearly identified the significance criteria related to VMT, which is appropriately based on the only adopted VMT standard in the region.” (FEIR/S, p. 3.1-7)

claiming future project-level reviews will address these impacts completely disregards the opportunity to ever address these impacts.

Further, from a GHG emissions perspective, while the FEIR/S claims the TBAP meets TRPA's RTP/SCS document, we believe that Tahoe should strive for more than the minimally-required reductions. TRPA's Development Rights Working Group recently discussed concerns that Lake Tahoe used to be "cutting edge" with regards to environmental planning but no longer are.¹⁵ Members agreed it was important to once again be a leader. The TBAP provides an opportunity to adopt innovative and more protective approaches to protect our climate. Further, as an area that will be subjected to the significant environmental and economic impacts of climate change, Lake Tahoe deserves better than the minimal effort.

Regional vs. local VMT impacts:

While it is correct that TRPA's VMT threshold standard is only regional, impacts to other threshold standards such as water quality, air quality, noise, and to other resources and public health and safety will still occur on a *local* scale; these impacts are not addressed by a regional VMT standard (we herein incorporate the 8/15/2016 comments by Greg Riessen, PE, submitted on the DEIS/R on behalf of the League to Save Lake Tahoe). CEQA and the TRPA Compact require that all impacts must be analyzed and disclosed, and mitigated where significant impacts may occur. This is why we have repeatedly requested, as early as in our NOP comments, that the EIR/S examine local impacts. That TRPA and Placer County failed to include significance criteria when the public first requested this analysis (notably, we requested this in the RPU analysis as well) to evaluate these impacts is no excuse to fail to evaluate them. The FEIR/S recognizes that traffic will increase within the Area Plan boundaries. It violates CEQA to fail to address these impacts to traffic within the TBAP, let alone the related local VMT impacts to other standards (i.e. water quality).

The FEIR/S also states that TRPA could choose to adopt a policy to examine local impacts, however, because no such policy currently exists now, it is not necessary to evaluate local impacts.¹⁶ While we appreciate that the FEIR/S acknowledges this issue, it still does not negate CEQA and TRPA requirements to evaluate all environmental impacts.

The FEIR/S also states that no meaningful information would come from an evaluation of local impacts.¹⁷ We do not agree. The reports regarding north/west shore trips versus south shore trips alone provide meaningful information, showing that traffic is on the rise in the TBAP area. This should necessitate that the TBAP include stronger traffic-reducing measures. Further, all available information regarding nearshore impacts indicates increased impacts from roadways and covered surfaces that are located closer to Lake Tahoe. This information necessitates that coverage closer to Lake Tahoe be reduced from existing amounts, and certainly not increased.

¹⁵ TRPA Attorney John Marshall, 9/7/2016.

¹⁶ "No other adopted VMT standards or regulatory requirements exist; development of an alternative VMT standard is within the policy discretion of the TRPA Governing Board. Placer County has not adopted a significance threshold with respect to VMT." (FEIR/S, p. 3.1-7)

¹⁷ "An analysis of the proportion of VMT that could occur within specific portions of the Plan area was not included because it would not provide meaningful information to assist in evaluating the Area Plan alternatives." (FEIR/S, p. 3.1-13)

These are just two examples of why local information is meaningful and necessary to guide future development in a way that protects Lake Tahoe.

We reiterate our request that the EIR/S examine local impacts, and believe its failure to do so is a violation of CEQA and the TRPA Bi-State Compact.

Proximity of roadways to Lake Tahoe:

It is inappropriate to rely solely on a regional focus when it is known that the closer roadways are to Lake Tahoe, the greater the threat from pollution. TRPA's 2015 TER notes that, "*Atmospheric deposition of fine sediments and adsorbed nutrients from road dust can have a disproportionately greater effect on the nearshore compared to deep lake sites due to proximity.*" (p. 4-37). The Lahontan Regional Water Quality Control Board's Lake Tahoe Nearshore Water Quality Protection Plan (2014) cited by the FEIR/S also notes that controllable factors such as the proximity of impervious surface to the lake may be partly responsible for local "hotspots" of periphyton.¹⁸ Further, the response to comments also acknowledges that traffic volumes have variable impacts on the nearshore water quality.¹⁹

3. Level of Service (LOS) Standard:

Substitute LOS Standard for Tahoe City:

Our comments on the DEIR/S raised concerns about the adoption of a substitute standard for LOS in Tahoe City to allow more congestion (lower LOS). The FEIR/S erroneously frames this issue as if there are only two options: one, to allow LOS to worsen, or two, to expand roadway capacity.²⁰ However, this ignores the third option: to evaluate and implement all available measures to reduce traffic on the roadways. While the FEIR/S includes revised and additional mitigation measures, not all available options were considered. In addition, measures that are difficult to implement or 'outside of the box' were dismissed; at some point, we will need to start going beyond the status quo to address these impacts. As our comments asked previously, if not at the RPU level, and not at the TBAP level, then when?

¹⁸ "The nearshore agencies have identified the need for geographically focused investigations of land uses and soils/geology to determine the causal factors affecting localized nearshore "hotspots" where elevated periphyton, increased turbidity, and/or high invasive clam populations have been measured. Controllable factors, such as proximity of impervious surface to the lake, sewer line exfiltration, concentrated recreation activities, and uncontrollable factors such as climate change and geology may be responsible for observed conditions" (p. 10)

¹⁹ "It is true that traffic volumes (or VMT, when volumes are multiplied by roadway length) may have differing impacts on water quality, but no local or regional standards have been defined for near-shore roadways." (FEIR/S, p. 3.3-143)

²⁰ "However, while there are those who disagree with the change in policy, Placer County and TRPA have concluded that increases in roadway capacity would be inconsistent with the Regional Transportation Plan and Regional Plan because they would also serve as an incentive for visitors and residents to use private automobiles instead of using alternative travel modes." (FEIR/S, p. 3.1-15)



Tahoe Regional Planning Agency
128 Market Street
Stateline, NV 89449

April 21, 2015

Subject: Update on Commodities Pilot Programs Development

Dear Members of the Regional Plan Implementation Committee:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments regarding the proposed Commodities Pilot Programs. We are concerned the proposed Pilot Programs will lead to substantially more growth in the Basin which was not analyzed by the RPU EIS. In fact, it was acknowledged at the 3/25/2015 RPIC hearing that the proposed Pilot Project 2 is “outside the scope of the RPU.” We also believe Pilot Program 1 is outside the scope of the RPU, as it would not meet the requirements in Code Section 50. Specific concerns are outlined in our comments to the Governing Board for 3/25/2015 (attached and incorporated by reference).

As we hope you will discuss during the 4/22/2015 annual GB retreat, there are other issues that TRPA, as the regional environmental planning agency charged with protecting Lake Tahoe, will have to face in coming years. Examples include the impacts of climate change and drought, such as increased flooding, lower lake levels, and ever-declining nearshore conditions. Strategies to **adapt** to climate change were not identified or analyzed in the RPU EIS,¹ nor were the appropriateness of the existing stormwater designs, which are based on the outdated 20-year (one inch per hour) storm.² Therefore, at this time, the RPU’s entire structure, which is based on outdated assumptions regarding weather patterns and flooding, is not adequate for dealing with the climate-related impacts we are already seeing in the Basin. The proposed Pilot Programs, which aim to further ‘implement’ the RPU, will only lead to more development that is not designed to address the new ‘normal’ for Lake Tahoe – more intense periodic storms, less snow, more rain-on-snow events, and more flooding.³

As also noted by RPIC members, these types of proposed changes often “become everyone’s expectations” or may be “etched in stone” (Placer County’s proposed Area Plan conversions were provided as an example). A complete environmental analysis is needed before any regional, or local, entity considers such amendments. It is also unclear what qualifies as “Centers” in the provisions in “3b” (p. 178). Would this apply to *Town* Centers, the High Density Tourist or Regional Center Districts, and/or mixed-use areas outside of Town Centers? Finally, at the 3/25/2015 meeting several RPIC and Local Government Committee members expressed agreement to discuss Pilot Program 2 in a ‘bigger picture’ commodity discussion at the GB’s retreat. We question why staff has brought forward a revised version in advance of the retreat, and request that the GB does not pursue the pilot programs at this time. FOWS’ comments regarding suggested priorities were provided to the Governing Board separately.

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

¹ In our 6/28/2012 comments on the Draft EIS, we clearly identified this need (see Final EIS, Volume 2, p. 3-379; http://www.trpa.org/wp-content/uploads/Volume_2_RPU_FEIS.pdf). However, the Final EIS response simply states: “The comment makes a strong case, however, that climate change impacts should be taken seriously in the Lake Tahoe Region and that a coordinated effort should be undertaken to understand and reduce these impacts. There are many efforts underway in the Region to better understand and address climate change, and the TRPA is an active partner in many, if not all of them.” (Volume 1, p. 3-299; http://www.trpa.org/wp-content/uploads/Volume_1_RPU_FEIS.pdf).

² See Final EIS, Volume 2, p. 3-379 and 3-478 for our comments on this need, and Volume 1, p. 3-347, as an example of how the Final did not address the issue: “The comment also states that the EIS should analyze whether the 1-hour storm design standard is appropriate throughout the Region. This comment refers to proposed provisions of the Regional Plan Update and does not pertain to the adequacy, accuracy or completeness of the environmental document. Please refer to Master Response 1, Comments Pertaining to the Draft Plans, Code of Ordinances, or Threshold Evaluation.”

³ http://www.waterboards.ca.gov/lahtontan/board_info/agenda/2015/jan/item_13.pdf;
<http://www.sfchronicle.com/science/article/New-normal-Scientists-predict-less-rain-from-6209104.php>



Tahoe Regional Planning Agency
128 Market Street
Stateline, NV 89449

March 24, 2015

Subject: Commodities Pilot Programs and Possible Future Priority Project

Dear Members of the Local Government and Regional Plan Implementation Committees:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments regarding the proposed Commodities Pilot Programs and Possible Future Priority Projects. We are concerned the proposed conversion ratio “pilot programs” will lead to substantially more growth in the Basin which was not analyzed by the RPU EIS. Specific concerns include, but are not limited to:

- Increased development from morphing of TAUs;
- Failure to fully evaluate the TDR program in light of other incentives and factors;
- Proposed conversion program is premature, and should only be considered as part of a comprehensive RPU update and threshold evaluation;
- Costs of commodities based on proposed conversions will favor conversion of CFA into TAUs, which will result in different impacts;
- Increased units and overall development of TAUs have not been evaluated in the RPU EIS; and
- Impacts to environmental thresholds have not been examined.

As the proposed change comes before the 2016 Threshold Evaluation, there is not adequate information available to assess how the changes may impact thresholds. In addition, no monitoring data for the thresholds, or tracking data for commodities and the TDR program, have been provided to date. Further, there is no understanding of the impacts of increased additional development in Town Centers (where the bonus units would be utilized) on the Lake, including localized impacts to Lake Tahoe’s nearshore. Increasing the amount of development that may occur in Town Centers through adoption of changing commodities is premature, not only due to the lack of new supporting data, but also is opposite to the intent of the Regional Plan’s stated four-year evaluation of thresholds and potential changes in policies and approaches of the Regional Plan.

Additionally, just as the proposed pilot programs require sufficient environmental review, the proposed priority projects for 2015 will require extensive review as well. However, as reflected by the proposed pilot projects, it appears a pattern has emerged whereby “prioritized” items are promoted through working groups and eventually result in proposed changes to the RPU without sufficient environmental review. In this case, what began as a priority item in 2014 has now resulted in the consideration of an important change to the RPU without having performed environmental review. Further, TRPA seems to be continuing to follow a strategy of keeping the rules for development in the Basin a moving target, which, in the absence of genuine environmental review and threshold findings, makes it virtually impossible for the public to know what future build-out will be.

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

Growth Limits in Regional Plan Update

As noted in the RPU EIS, *“Allocations are used as a growth management tool to ensure that development is consistent with progress toward meeting environmental thresholds.”* (DEIR, p. 3.2-8). The proposed amendments have not been evaluated in the context of the status of the environmental thresholds, nor does the staff report include evidence regarding positive or negative impacts to thresholds. Further, bonus units are not based on an assessment of the Basin’s carrying capacity; rather, they are created by TRPA.¹ The proposed commodity transfers, as noted below, will increase development potential even with the current ‘limit’ on bonus units. However, TRPA can easily add more bonus units in the future, just as more were added through the 2012 Regional Plan Update. As the staff report notes, the proposed Future Commodity System Issues and Potential Approaches (Attachment A) include: *“Allow[ing] public entities to use the pilot program conversion ratios within adopted area plans (note: may include on-site conversions) for jurisdictions’ own commodity pools)”* and the release of an additional 200,000 sq. ft. of CFA into the pool. These two actions combined are also likely to generate a significant increase in growth.

TAU morphing and conversions:

The proposed amendments may result in substantial increases in growth, as illustrated below.

1. Morphing of TAU size and resulting impacts to population, coverage, and number of vehicles:

For years, the TRPA Board and community members have frequently discussed the disproportionate size related to transferred TAUs (for example, 250-300 sq. ft. existing hotel rooms are torn down [one unit] and ‘transferred’ to develop new tourist units [one unit] upwards of 1,800 sq. ft.). However, first, taking the transfer ratios out of the mix for the moment, consider the following example: a developer can tear down 30 motel rooms, each 300 sq. ft. in size, and transfer the TAUs to construct 30 units, each 1250-1800 sq. ft. in size. This could result in a 6-fold increase in floor area (from 9,000 sq. ft. to 54,000 sq. ft.). Additionally, the smaller units may have housed two people with one vehicle; larger units may house 6-8 people or more. At two people per vehicle, this means more cars on the roadway and more demand for parking (which means more coverage). Increased parking will also create a disincentive to using public transit. This morphing situation does not currently exist with CFA - where a conversion of existing uses to CFA is currently allowed (Code 50.10.C), the conversion is equal – one square foot of existing floor area can be converted to one square foot of CFA.² However, the proposed transfer

¹ In addition to allocations and transfer protocols set in the 1987 Regional Plan, TRPA has established the Bonus Unit Incentive Program to encourage environmental improvements in the Region, which may include land conservation and protection, regional smart growth infrastructure, habitat restoration, public recreation opportunities, and reduced land coverage. Under the program, the environmental improvements of a proposed project are quantified using a point system and rights for additional, or bonus, units for residential or tourist accommodation are awarded based on the number of points earned by the project. Only projects within target areas are eligible for the Bonus Unit Incentive Program. (RPU DEIR, p. 2-11).

² Code 50.10.C: “Residential and tourist accommodation units shall be converted to commercial floor area at a ratio of one square foot of existing floor area to one square foot of commercial floor area, using the subsection 50.6.2 criteria for measurement of floor area;...”

ratios for converting CFA into TAUs do not limit the size of the TAUs. For example, under the proposed ratio, 454 sq. ft. of CFA would be converted to one TAU that could then cover 1,200-1,800 sq. ft.³

2. When transfer ratios are considered along with morphing, the increase in growth potential becomes even more exponential:

As noted above, TAU morphing may already result in a six-fold increase in growth potential (e.g. conversion of a 300 sq. ft. motel room to a 1,800 sq. ft. tourist accommodation). However, when the transfer ratios associated with transferring from sensitive lands to Centers are added to the mix, the growth could increase another three-fold.⁴ For example, first consider the 30-unit motel room noted above. After the transfer, floor area could have increased by 6 times; population by an additional 6 people per unit, and four vehicles instead of one per unit. However, if the transfer ratios are also applied, it appears this transfer could allow up to a 6-fold increase in coverage (a net increase of 45,000 sq. ft. of coverage) and a net increase in the number of new TAUs by 3 times. With larger TAUs and more of them, the increases could be as follows:

	Existing TAUs		New TAUs			
	Existing TAU	Total: 30 existing TAUs	New TAU	30 new TAUs	60 new TAUs	90 new TAUs
People/unit	1-2	30-60	6-8	180-240	360-480	540-720
Unit size (sq. ft.)	300	9,000	1,800	54,000	108,000	162,000
No. Vehicles	1	30	3-4	90-120	180-240	270-360

The point of the rough numbers above is to reflect the maximum possible increases in growth that could occur with existing TAU transfer ratios and Code provisions. While the Code allows increases in CFA area based on the transfer program, even the combination of incentives would not result in a potential 24-fold increase in CFA size (e.g. 720 people

³ Code Section 51.5.2.K.2: “Provided the conditions in subparagraph 1 above are met, 80 percent of the tourist accommodation units on the receiving site may be up to 1,200 square feet, with kitchens, and no more than 20 percent of the project’s floor area may contain units not to exceed 1,800 square feet, with kitchens.”

⁴ *Transfer of Existing Development/Transfer of Development Rights*

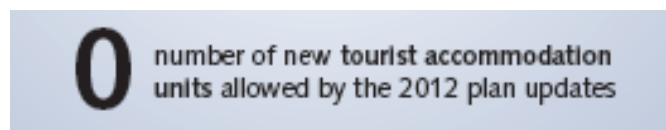
The above chart shows that transfer of existing development (e.g., when the sending site has existing development which is removed and the parcel is environmentally restored) is treated slightly differently than the transfer of a development right (e.g., when the sending parcel is retired and deed restricted, and the development right is transferred; these rights were granted in the original Regional Plan). The bonus units earned in both scenarios do not require an allocation from TRPA. The higher ratios are granted to the first column, when a sending site is both retired and structures are demolished to restore the site to its natural environment. If the sending site is located in a Stream Environmental Zone (SEZ), and is restored, the highest ratio is granted, (a total of 3 units for the existing 1 unit removed). It should be noted that this system applies to existing residential units (ERU), tourist accommodation units (TAU), and commercial floor area (CFA). Also, the receiving sites must be located in the districts in the Regional Plan Update designated as Town Center, Regional Center, or High Density Tourist Center. (BAE report included in RPU EIS, p. 3) [Emphasis added].

compared to 30 people per unit). Therefore, direct comparisons between TAU and CFA again mix apples and oranges.

The staff report, which appears to base its entire conclusion on the number of trips per unit, fails to account for the other Code provisions which allow for potentially significant increases in growth. Such increases allowed through the bonus unit program were not contemplated by the RPU, and therefore these changes would violate the claimed growth limits of the RPU.

3. **The result of the proposed conversion amendments would create additional new TAUs in the Basin, contrary to the growth contemplated by the RPU.**

One of the key ‘advertisements’ of the new RPU included no new TAUs:⁵



The RPU also advertised “retaining the established regional growth control system”⁶:

Important policies being addressed by the Regional Plan Update include:

- Retaining the established regional growth control system. Under this system, rampant overdevelopment was stopped and open spaces preserved. Most of the current policies in the Regional Plan will remain in place.

In summary, the proposed conversion amendments would allow for substantial increases in growth compared to what was analyzed in the RPU EIS, and therefore a comprehensive environmental analysis of the impacts of any proposed amendments to the commodities program is required.

Policy amendments need to be based on a review of all information at four-year increments, per the RPU:

The RPU was presented as a ‘package’ that would rely on limited commodities, as well as information about the thresholds, to improve threshold achievement and maintenance. As stated by the Executive Director in November 2012:

She will be presenting what Staff plans to report on whether the regional plan strategies are working. She said that the threshold monitoring is only one piece of those performance measurements of the Regional Plan’s success and progress. She is going to preview the whole package of reporting, on regional plan performance benchmarks...She will be presenting what Staff plans to report on whether the regional plan strategies are working. She said that the threshold monitoring is only one piece of those performance measurements of the Regional Plan’s success and progress. She is going to preview the whole package of reporting, on regional plan performance benchmarks (Nov. 2012 GB minutes, p.25)

⁵ http://www.trpa.org/wp-content/uploads/RPU_2pager_Numbers_3-251.pdf

⁶ http://www.trpa.org/wp-content/uploads/RPU_FactSheet_1-15-13.pdf

Yet the proposed amendments would change a part of this ‘package’ without any analysis related to threshold status, conditions, nor any assessment of how these proposed conversions would work with the larger “RPU package” to facilitate threshold improvement.

In addition, TRPA stated the full package would be assessed every four years, and with the threshold evaluation report serving as the ‘basis,’ changes to policies and strategies would be made (excerpt below). The proposed conversions are not associated with an updated threshold review, therefore making these changes now would contradict the intent of the RPU.

The performance benchmark reporting system is something that we have started a conversation with the California Legislative staff. There are more requirements and needs for regular annual reporting than only the Threshold indicators, here are all the different types of regional plan performance benchmarks; four of the five categories are new requirements under the regional plan update. In addition to our Threshold monitoring all five of these annual reports will roll up into the Agency’s four-year Threshold Evaluation and will be the basis of consideration when reprioritizing our annual budgets, as well as making changes to the policies and strategies of the Regional Plan. (Nov. 2012 GB minutes, p. 26) [Emphasis added].

TRPA also stated that the Board would receive information regarding CFA, TAUs, residential allocations and development rights, existing units of use, and bonus units used in incentive programs in order to make policy changes. However, this full package of information has not been made available for the proposed amendments to the commodities program.

A new category called for and required in the Regional Plan Update. It has become more important to track these factors of the Regional Plan Update Commodity Tracking so that we can best assess our new Regional Plan Update strategies. It has not been well tracked in the past, but one of the benefits of this Regional Plan and this EIS is that there is now a full, completely up-to-date, very accurate accounting of commodities in the Basin, and the intent is to keep it that way. We will be tracking commercial floor area, tourist accommodation units, residential allocations and development rights, existing units of use, and bonus units used in incentive programs. All will be available to report to the Board for policy making. (Nov. 2012 GB minutes, p. 27) [Emphasis added].

Failure to analyze Full Suite of TDR incentives

As TRPA’s staff explained a month before the RPU’s adoption,⁷ the RPU contains many incentives for re/development, in addition to the bonus units. For example, other incentives for encouraging re/development and removing coverage from sensitive lands include increases in height, density, and coverage allowances. The impacts of these other incentives, and any needed modifications, have not been assessed. Separating out the bonus unit program without addressing

⁷ Mr. Stockham said that a situation could arise where there is not restoration in Placer County because of the lack of incentives, but TRPA fundamentally disagrees with that thought. There is an abundance of existing development in SEZs and other sensitive lands in Placer County that is eligible for transfer and eligible for incentives. Just because the sensitive land development is in a town center does not exclude it from being eligible for incentives. It is not just transfer ratios. There are ratios for transfer of development. There are provisions for transfers of non-conforming coverage, which is a common situation in Placer County. There are increases in height, density and coverage allowances within centers to provide a receiving area for transfers of development and there are numerous other improvements and incentives to more actively incentivize and encourage the restoration of sensitive lands. There are far more than just any existing plan and more than just transfer ratios. The Regional Plan Update Committee spent many days working through those issues and developing compromises to balance the interests in providing these incentives with related concerns. (Nov. 14/15 2012 minutes, p. 6). [Emphasis added]

the other incentives results in a piecemeal approach, and the inability to understand what incentives may work and which may need revisions in order to meet the ultimate goal of restoring sensitive lands.

In addition to the RPU's new incentives, the TRPA Code has established several methods for projects to obtain TAUs or CFA:

50.10.1 General Conversion Standards:

Existing residential units may be converted to tourist accommodation units or commercial floor area, and existing tourist accommodation units may be converted to residential units or commercial floor area if the conversion complies with subsections 50.10.3, 4, 5, 6 or 7 and with the following conversion standards:

- A. The proposed conversion shall be evaluated for adverse impacts using the Initial Environmental Checklist (IEC) and the addenda developed by TRPA for conversions and shall not be permitted if adverse impacts cannot be mitigated;
- B. Residential and tourist accommodation units shall be converted on a ratio of one unit for one unit;
- C. Residential and tourist accommodation units shall be converted to commercial floor area at a ratio of one square foot of existing floor area to one square foot of commercial floor area, using the subsection 50.6.2 criteria for measurement of floor area; and
- D. A maximum of 200 residential units and 200 tourist accommodation units may be converted within a calendar year for the region.

50.10.2. Conversions to Multi-family Units

A pilot program is created under this subsection that allows for the conversion of no more than 200 TAUs to ERUs for multi-unit projects, subject to the following conditions:

- A. Each TAU can be used for a maximum of 1,250 sq. ft. of residential floor area;
- B. The conversion must happen on the same parcel; and
- C. TRPA shall monitor the impacts to thresholds of pilot program.

50.10.3. Transfer From Sensitive Lands

Conversion of an existing residential or tourist accommodation unit to a residential, tourist, or commercial use may be permitted when a residential or tourist unit is transferred from a parcel classified as land capability districts 1, 2, 3, or 1b (Stream Environment Zone), and the parcel is restored

The RPU FEIS, Volume 1, also noted the availability of 100's of unused development rights, which can be purchased and used to transfer development (and protect sensitive areas).

An important consideration in estimating future TDR utilization for development rights involved the development potential on parcels that currently have unused development rights. Available Regional-scale data indicate that approximately 535 development rights are currently located on unbuildable parcels (generally in SEZs) and an additional 765 development rights are located on parcels that may or may not be buildable (e.g., sensitive lands that are currently unbuildable under IPES). Development rights on unbuildable parcels can only be used if they are transferred to buildable parcels. These sensitive land development rights also qualify for the highest transfer ratios and are, therefore, more likely to be transferred to community centers. (FEIS, Vol. 1, p. 3-39). [Emphasis added]

The staff report includes no analysis of these other methods, what the environmental impacts and benefits would be using these other methods compared to the proposed amendment, nor has an economic assessment been presented evaluating the costs of the different ways projects may obtain these commodities.

No evidence of demand for hotel rooms:

Further, as it appears TRPA has predicated the change based on the belief that implementation of the TDR program will benefit the environmental thresholds, there has been no evidence presented by Placer County that the proposed conversion ratios will accelerate implementation of the TDR program and the restoration of sensitive lands. No evidence has been provided regarding a public demand for additional TAUs in Placer County. The recently-released “Economic Development Report”⁸ does not show a demand for new hotel rooms.

“At the same time, communities located just outside the Lake Tahoe Basin have been the focus of vast investment, creating comprehensive village-style resorts that capture visitor interest and revenue, but for the most part lack full-time residential populations that provide an authentic community atmosphere. This investment phenomenon has further diverted or flattened tourism market share from the once thriving lakeside Tahoe basin communities.” (Economic Development Report, p. 1)

“Finding-...The region is still perceived as a “drive-up” market. This driving-based daytime economy leads to an underrepresentation of activity usually accompanying summer resort operations, such as high-end evening dining, entertainment, and other local activities relying on a lodging base. Creation of new lodging and mixed use commercial product in the Town Centers to encourage walking, biking, use of public transit and other activities typically seen in economically vibrant mountain communities will assist in changing this dynamic...” (Economic Development Report, p. 3).

Rather, it appears that Placer County and development interests want to construct new hotel rooms in Placer County. This is not the same as providing evidence of a demand for them.

The Economic Development Report merely references developments in adjacent areas, such as Northstar and Squaw Valley, and implies that investments in additional units in those areas have resulted in economic benefits. First, comparisons to those areas are irrelevant, unless the Tahoe City community has decided it wants to look like Northstar and Squaw Valley (although this goes against all indications that the community wants to retain its existing character). Second, most infrastructure in Tahoe was built decades ago; whereas increased developments in places like Northstar have occurred in more recent years. Comparing the economies of places already developed decades ago to places with new development (note: not *redevelopment*) is comparing apples to oranges.

This again points to the need to perform a comprehensive examination of the commodities program to understand existing conditions and the impediments to the implementation of the program.

Commodity Values:

The proposed conversion ratio will create a situation where purchasing CFA and converting it to TAUs is likely to be far less expensive than purchasing TAUs. Under the proposed transfer ratio, if a developer purchases 454 sq. ft. of CFA, this will cost roughly \$18,160 (assuming CFA costs at \$40/square foot, the maximum noted in the RPU EIR Attachment, the 2012 BAE Report). If this CFA is converted to one TAU, the developer has just paid \$18,160 for the TAU. Notably, if

⁸ <http://www.placer.ca.gov/~media/ceo/tahoe/documents/2015-02-24-BOSHearing-Incentives-N-LakeTahoe-Town-Ctrs.pdf>; Hearing Report. Economic Development Incentives for. North Lake Tahoe Town Centers. Prepared for: Placer County. February 2015.

CFA costs \$30/sq. ft. (the low end in the BAE report), the developer will have paid even less for one TAU.

However, one TAU unit costs approximately \$25,000-65,000 per unit (BAE 2012). As a result, it will be far less expensive for developers to purchase CFA (of which there is a substantial availability in the Basin) and convert it to TAUs – thereby resulting in far more additional TAUs than were analyzed in the RPU EIS. Given the RPU EIS did not include any new TAUs in its analysis, it cannot be used to tier from and a new analysis of the impacts of these new TAUs is required.

Costs of Development Rights

The most challenging aspect of the pro forma analysis is estimating the future cost of development rights. The California Tahoe Conservancy, which serves as the California clearinghouse for TDRs (in Nevada, it is the State Division of State Lands), reports that they currently have existing development rights for residential units ranging from \$17,000 to \$20,000 per residential right. In addition, TRPA has collected information regarding past development rights purchase transactions. Its information indicates that past transactions for a sensitive lands retirement/restoration program ranged up to \$80,000 per development right. Thus, these form the low end (\$17,000) and high end (\$80,000) of the assumed existing residential development right purchased in the pro forma model for development of condominiums.

For Tourist Accommodation Units (TAUs), available information suggests that development rights have ranged in the past from \$25,000 to \$65,000 per unit. It should be noted that the available information for TAU development right costs is somewhat limited, as few of these projects have gone through the TDR process and obtained development rights in recent years.

Commercial Floor Area (CFA) development rights reportedly cost approximately \$30 to \$40 per right (which is per square foot). However, it has been proposed in the draft RP that each community in the Regional Plan receive an allocation of new CFA from a total pool of 200,000 square feet for the region; this allocation would be at limited to no cost to the developer if he/she can obtain the allocation from the development project host community (some communities charge a small amount to the developer). However, due to the draft nature of this proposal, the analysis herein assumes that the CFA development rights would need to be acquired at “market rate” costs; thus, for the projects with commercial space in their development program (Mixed-Use with ground floor retail), the full range of \$30 to \$40 per square foot of CFA for all new space developed, is tested. (BAE report, p. 6-7)

Pilot Projects:

The Code of Ordinances does not include any provisions allowing exemptions for projects or policy changes deemed “Pilot Projects.” However, the Code does require TRPA to make several environmental findings, including:

Code 4.4.2.C: “4.4.2.C. Confirm that any resource capacity utilized by the project is within the amount of the remaining capacity available, as that remaining capacity has been identified in any environmental documentation applicable to the project, including the environmental impact statement for the Regional Plan package;...”

Code 4.6: “TRPA shall find, in addition to the findings required pursuant to Section 4.4, and in accordance with Sections 4.2 and 4.3, that the Regional Plan and all of its elements, as implemented through the Code, Rules, and other TRPA plans and programs, as amended, achieves and maintains the thresholds.” (Code 4.6). [Emphasis added]

The staff report lists the following as “benefits” from the Pilot Projects:

Pilot Program 1:

Benefits: Replenish the tourist bonus unit supply needed to implement the transfer of development rights program, incentivize the restoration of SEZs and other sensitive lands, support re/development in centers, maintain consistency with the overall growth limits adopted as part of the 2012 Regional Plan amendments, and ability to tier from RP EIS analysis.

The benefits list does not indicate that replenishing the tourist bonus unit supply will equate to the restoration of SEZs or other sensitive lands. In fact, adding bonus tourist units (through conversion of CFA) bypasses sensitive land restoration, instead of incentivizing it. For example, Placer County could purchase banked TAUs from a private or public entity, and be awarded with three times as many TAU bonus units, without any on-the-ground SEZ restoration taking place.

In combination with the ability to morph TAUs into much larger units, the increases in growth could be significant. There is no discussion of the environmental impacts of this growth in the future in the RPU EIS, and therefore the environmental impacts have not been examined in detail. In addition, replenishing the TAU bonus unit supply before the first RPU four-year evaluation in 2016 is premature. There has not been a full ‘test’ and evaluation of the TDR program. If it is currently failing, there needs to be a detailed report regarding how and why it is failing, particularly given the RPU did not provide for any new TAUs, and the conversions will result in new TAUs.

The claimed benefits also include maintaining consistency with the overall growth limits in the 2012 RPU; as noted throughout the comments, the proposed amendments do not maintain this consistency. Finally, because the RPU EIS did not examine these amendments, and the anticipated increases in growth they will result in, TRPA cannot tier from the RPU.

We also ask which ‘benefits’ TRPA aims to achieve from the proposed Pilot project. Based on the TRPA Compact, TRPA’s role is to achieve and maintain the environmental thresholds, yet the listed benefits only include reference to one threshold – SEZ/sensitive land restoration. The other ‘benefits’ address alleged red tape and tiering from the RPU.

Pilot Program 2:

Benefits: Promote scenic threshold gains, promote restoration, concentrate development in Centers, may reduce Vehicle Miles Traveled (VMT), may facilitate Total Maximum Daily Load (TMDL) implementation, and promote development that uses contemporary design standards

The scenic threshold gains are presumably the threshold standard related to the built environment. There are two other scenic thresholds which aim to protect the **natural** scenic quality of the Basin.⁹ For example, the proposed project may result in the construction of 4-story tall buildings in Tahoe City (as allowed in Town Centers). Such structures will most likely harm the views protected by TRPA’s scenic thresholds based on the Basin’s natural qualities. TRPA must not ignore impacts to the natural scenic resources for the sake of presumed improvements to the ‘built’ environment. If the TRPA intends to overlook impacts of newly-sized projects on the natural scenic values of the basin, it must state so clearly, and establish criteria and limits to

⁹ http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch9_Scenic_Oct2012_Final.pdf

such intrusions. Further, to allow new impacts on the natural scenic values of the basin is a serious matter and must be fully addressed in an EIS to examine the impacts regarding natural scenic standards.

The benefits statement also fails to include actual benefits to VMT and the TMDL, instead referring to the possibility that they ‘may’ have these benefits. The environmental findings TRPA must make for Code amendments do not allow for conclusions that projects “may” achieve and maintain the thresholds – rather, they require that the Regional Plan, as amended, achieves and maintains the thresholds (Code 4.6).

Future Commodity System Issues and Potential Approaches:

Considering the changes included in the list in Attachment A is also premature. Before additional changes to the RPU are considered, TRPA must first complete a thorough review of the thresholds, commodities tracking, and all related information TRPA must consider in the RPU update and review scheduled for 2016. We are concerned that, as reflected by the proposed pilot projects, a pattern appears to have emerged whereby “prioritized” items are promoted through working groups and eventually result in proposed changes to the RPU without sufficient environmental review. In this case, what began as a priority item in 2014 has now resulted in the consideration of a major change to the RPU without having performed environmental review. Further, TRPA seems to be continuing to follow a strategy of keeping the rules for development in the Basin a moving target, which, in the absence of genuine environmental review and threshold findings, makes it virtually impossible for the public to know, and therefore analyze, what future build-out will be.

- Increase VMT; and
- Reduce (worsen) LOS.

The FEIR/S concludes the TCL impacts to be less-than-significant because there will be a reduction in average daily trips, and the increased VMT and reduced LOS impacts are less than would otherwise occur under the No Action alternative.²⁸

We appreciate the revisions and additional mitigation measures included in the FEIR/S to address transportation impacts, including Vehicle Miles Traveled (VMT) and congestion. In addition, the explanation of historical changes regarding VMT modeling is extremely helpful; we appreciate this being laid out in detail for the public in the FEIR/S.²⁹

2. VMT impacts:

The TBAP FEIR/S states cumulative regional VMT will increase even under the No Action alternative. As noted in our comments on the RPU EIS and TBAP DEIR/S (i.e. regarding changes such as conversions of CFA to TAUs), we do not believe the transportation analyses have sufficiently evaluated the TBAP's potential VMT impacts. Even if regional VMT were reduced by the RPU, this would still not address the local increases in VMT within the TBAP boundaries.

TRPA's RPU EIS deferred analysis of local impacts to the environmental analysis that would accompany the Area Plans.³⁰ However, the TBAP fails to consider the local impacts, citing this is not necessary because the regional VMT standard would not be violated.³¹ TRPA's 2015 Threshold Evaluation Report (p. 12-27; see Table 12-15 below) shows an increase in traffic in the North/West area of the Tahoe Basin; notably, decreases in the South Shore appear to 'cancel out' the impacts of increased VMT in the north/west shore when only the regional VMT is considered.

²⁷ "As for impacts from the proposed Tahoe City Lodge project, the Draft EIS/EIR discloses that the project would reduce average daily trips, but produce both a small increase in VMT and decrease in LOS as compared to the baseline condition..." (FEIR/S, p. 3.1-2)

²⁸ "[The TCL would produce a] decrease in VMT and better (increase) LOS when compared to the "No Project" alternative (Alternative 4)." (FEIR/S, p. 3.1-2)

²⁹ p. 3.1-3 to 3.1-6

³⁰ Noted in our NOP and DEIR/S comments.

³¹ "As described above, the Draft EIR/EIS clearly identified the significance criteria related to VMT, which is appropriately based on the only adopted VMT standard in the region." (FEIR/S, p. 3.1-7)

Table 12-15. Change (Δ) in Daily Vehicle Trip Ends (DVTE) and Vehicle Miles Traveled (VMT)

Jurisdiction	2010	2011	2012	2013	2014	Total Δ by Jurisdiction
Douglas						
DVTE	800	1,259	-1,549	-2,732	3,724	1,502
VMT	3,200	11,353	-14,628	-12,649	15,082	2,358
Washoe						
DVTE	0	251	-892	-378	981	-38
VMT	0	6,171	-14,495	-1,908	6,565	-3,667
El Dorado						
DVTE	-1,500	4,200	-200	0	-7,900	-5,400
VMT	-5,643	13,935	-10,840	0	-33,866	-36,414
Placer						
DVTE	-800	1,000	-500	0	4,000	3,700
VMT	-4,040	14,477	-12,185	0	17,480	15,732
Annual Δ						
DVTE	-1500	6,710	-3,141	-3,110	805	-236
VMT	-6,483	45,936	-52,148	-14,557	5,261	-21,991
Notes: Based on traffic counts collected by Caltrans and NDOT. VMT is calculated by TRPA using average trip length, survey data and modeling.						
Source: TRPA, Caltrans and NDOT Annual Traffic Count Programs						

It is contrary to CEQA for TRPA's RPU to defer local impact analyses to future area plan reviews and then for subsequent area plan reviews to fail to perform local analyses because the RPU concluded regional standards will be met. This begs the question – if neither the RPU or area plans will address improvements to local traffic impacts compared to existing conditions, then when will this occur? Traffic is a regional and areawide issue, just as many solutions are also most effectively implemented at the regional and areawide scale (i.e. improved transit programs require coordination and implementation at a larger scale). Skirting this issue and claiming future project-level reviews will address these impacts completely disregards the opportunity to ever address these impacts.

Further, from a GHG emissions perspective, while the FEIR/S claims the TBAP meets TRPA's RTP/SCS document, we believe that Tahoe should strive for more than the minimally-required reductions. TRPA's Development Rights Working Group recently discussed concerns that Lake Tahoe used to be "cutting edge" with regards to environmental planning but no longer are.³² Members agreed it was important to once again be a leader. The TBAP provides an opportunity to adopt innovative and more protective approaches to protect our climate. Further, as an area that will be subjected to the significant environmental and economic impacts of climate change, Lake Tahoe deserves better than the minimal effort.

Regional vs. local VMT impacts:

While it is correct that TRPA's VMT threshold standard is only regional, impacts to other threshold standards such as water quality, air quality, noise, and to other resources and public health and safety will still occur on a *local* scale; these impacts are not addressed by a regional VMT standard (we herein incorporate the 8/15/2016 comments by Greg Riessen, PE, submitted on the DEIS/R on behalf of the League to Save Lake Tahoe). CEQA and the TRPA Compact

³² TRPA Attorney John Marshall, 9/7/2016.

require that all impacts must be analyzed and disclosed, and mitigated where significant impacts may occur. This is why we have repeatedly requested, as early as in our NOP comments, that the EIR/S examine local impacts. That TRPA and Placer County failed to include significance criteria when the public first requested this analysis (notably, we requested this in the 2012 RPU analysis as well) to evaluate these impacts is no excuse to fail to evaluate them. The FEIR/S recognizes that traffic will increase within the Area Plan boundaries. It violates CEQA to fail to address these impacts to traffic within the TBAP, let alone the related local VMT impacts to other standards (i.e. water quality).

The FEIR/S also states that TRPA could choose to adopt a policy to examine local impacts, however, because no such policy currently exists now, it is not necessary to evaluate local impacts.³³ While we appreciate that the FEIR/S acknowledges this issue, it still does not negate CEQA and TRPA requirements to evaluate all environmental impacts.

The FEIR/S also states that no meaningful information would come from an evaluation of local impacts.³⁴ We do not agree. The reports regarding north/west shore trips versus south shore trips alone provide meaningful information, showing that traffic is on the rise in the TBAP area. This should necessitate that the TBAP include stronger traffic-reducing measures. Further, all available information regarding nearshore impacts indicates increased impacts from roadways and covered surfaces that are located closer to Lake Tahoe. This information necessitates that coverage closer to Lake Tahoe be reduced from existing amounts, and certainly not increased. These are just two examples of why local information is meaningful and necessary to guide future development in a way that protects Lake Tahoe.

We reiterate our request that the EIR/S examine local impacts, and believe its failure to do so is a violation of CEQA and the TRPA Bi-State Compact.

Proximity of roadways to Lake Tahoe:

It is inappropriate to rely solely on a regional focus when it is known that the closer roadways are to Lake Tahoe, the greater the threat from pollution. TRPA's 2015 TER notes that, "*Atmospheric deposition of fine sediments and adsorbed nutrients from road dust can have a disproportionately greater effect on the nearshore compared to deep lake sites due to proximity.*" (p. 4-37). The Lahontan Regional Water Quality Control Board's Lake Tahoe Nearshore Water Quality Protection Plan (2014) cited by the FEIR/S also notes that controllable factors such as the proximity of impervious surface to the lake may be partly responsible for local "hotspots" of periphyton.³⁵ Further, the response to comments also acknowledges that traffic volumes have variable impacts on the nearshore water quality.³⁶

³³ "No other adopted VMT standards or regulatory requirements exist; development of an alternative VMT standard is within the policy discretion of the TRPA Governing Board. Placer County has not adopted a significance threshold with respect to VMT." (FEIR/S, p. 3.1-7)

³⁴ "An analysis of the proportion of VMT that could occur within specific portions of the Plan area was not included because it would not provide meaningful information to assist in evaluating the Area Plan alternatives." (FEIR/S, p. 3.1-13)

³⁵ "The nearshore agencies have identified the need for geographically focused investigations of land uses and soils/geology to determine the causal factors affecting localized nearshore "hotspots" where elevated periphyton, increased turbidity, and/or high invasive clam populations have been measured. Controllable factors, such as

Final Draft Plan also incorporates the elements of Mitigation Measure 3.8-4 that apply to the ADA exemption (Draft Code Section 30.4.6). The Draft EIS finds that the combination of coverage exemptions proposed under Alternative 4, with mitigation measures, would result in less-than-significant impacts.

The comment also states that a project applicant should be able to select one or more of the coverage reduction strategies for coverage mitigation (such as those listed for Alternative 4). This practice is currently allowed and is not proposed to be changed.

1129-6

The comment states that the RTP/SCS Draft EIR/EIS fails to provide adequate detail or analysis of the proposed Transportation Strategy Package B project identified as "Intercept Parking Lots with Shuttles to Town Centers." The comment further states that Article IX, Section (f)(8) of the Tahoe Regional Planning Compact prohibits the Tahoe Transportation District from imposing a "tax or charge that is assessed against people or visitors as they enter or leave the region...." The comment states that the RTP/SCS EIR/EIS should provide sufficient detail of the proposed "Intercept Parking Lots with Shuttles to Town Centers" and "road user fees" so a determination can be made whether or not the project is legal under the relevant provisions of federal law.

The comment correctly cites the Compact prohibition of an entry/exit tax. TRPA Compact Article V. PLANNING: Sub Paragraph (c): Section (2) states that the goal of transportation planning is:

(A) To reduce dependency on the automobile by making more effective use of existing transportation modes and of public transit to move people and goods within the region; and

(B) To reduce to the extent of feasible air pollution which is caused by motor vehicles.

TRPA Compact Article IX. TRANSPORTATION DISTRICT: Sub Paragraph (f) states:

(8) By resolution, determine and propose for adoption a tax for the purpose of obtaining services of the district. The tax proposed must be general and of uniform operation throughout the region, and may not be graduated in any way, except for a sales and use tax which, if approved by the voters, may be administered by the states of California and Nevada respectively in accordance with the laws that apply within their respective jurisdictions. The district is prohibited from imposing an ad valorem tax, a tax measured by gross or net receipts on business, a tax or charge that is assessed against people or vehicles as they enter or leave the region, and any tax, direct or indirect, on gaming tables and devices. Any such propositions must be submitted to the voters of the district and shall become effective upon approval of two-thirds of the voters voting on the proposition. The revenues from any such tax must be used for the service for which it was imposed, and for no other purpose.

This provision in the Compact prohibits a Region entry/exit charge administered by the Tahoe Transportation District, the entity with the authority to impose a fee or charge. Intercept lots are not specifically prohibited under the Compact. Road user fees could be imposed in a variety of different ways that comply with Compact restrictions—for instance, as a congestion toll within the Region, or as a parking fee. This would provide a cost disincentive to driving and a cost incentive to utilizing the intercept lots and shuttles.

A congestion pricing system would be compatible under certain circumstances with federal Law and the TRPA Compact. Regarding federal regulations, Title 23 United States Code: Section 129, Tolling Agreements, allows tolling of non-Interstate Highways as well as Interstate Bridges and Tunnels; it allows federal aid to be used for the construction and maintenance of toll roads, conversion of existing roads into toll roads, or adding toll lanes to existing roads, provided that the roads are not part of the Interstate Highway System. Since the roads in question—U.S. Highway 50 (a federal highway), California State Routes 89 and 28, and Nevada State Route 28—are not Interstates, they can be tolled. A congestion charge involving toll collection could be implemented in accordance with the Compact somewhere along U.S. Highway 50 and other Region roadways as long as it is within the Region and not at points of entry to it. A congestion parking fee could also be implemented in accordance with the Compact because it would charge people based on the times they decide to travel from their place of lodging or to their place of recreation and not based on the direction of their travel or the location of their residence.

Any road user fees would be required to comply with federal regulations and Compact restrictions, and therefore would not represent an illegal element of Transportation Strategy Package B (and Alternative 2).

The comment further states that the Regional Plan Update EIS should disclose whether Alternative 2 would be able to meet Tahoe's assigned GHG reduction targets for both 2020 and 2035 without this project. The comment is requesting analysis of a modified alternative; however, the Regional Plan Update EIS and RTP/SCS EIR/EIS already analyze a reasonable range of alternatives. No further analysis associated with intercept lots and road user fees, or the removal of these elements from the alternatives description, is required.

- I129-7 The comment raises concerns that linking release of allocations with roadway LOS is contrary to other stated goals in the Regional Plan Update and RTP/SCS that support multi-modal complete streets projects, such as the Kings Beach Commercial Core Improvement Project. Please see the Response to Comment A32-16 and Master Response 12, Relationship between Phased Allocations and Level of Service Significance Criteria.
- I129-8 The comment expresses concerns regarding the viability of the proposed transfer programs. The comment suggests that a high priority be placed on the development, funding, and implementation of the Development Rights Acquisition and Land Restoration Program, proposed in Comment I129-3. Please see the Response to Comment I129-3. In addition, the Final Draft Plan, described in Chapter 2 of this Final EIS, Revisions to Alternative 3: Final Draft Plan, includes a priority task (following adoption) to review the efficacy of the development transfer ratios (see Attachment 5 of the Final Draft Goals and Policies). Also, please see Master Response 8, Feasibility of the Proposed Transferable Development Incentive Program.
- I129-9 The comment expresses support for TRPA's goal to continuously update the Regional Plan in four-year cycles and to analyze the effectiveness of transfer development rights programs. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.
- I129-10 The comment expresses support for the elimination of barriers to environmental redevelopment, specifically process duplications and cumulative costs in time and resources. Area Plans proposed under Alternative 3 are intended to allow public agencies to prepare plans

Comments on TRPA Linking Tahoe Transportation Plan

1. Page 1-10: Figure 1.3 Envisions the Tahoe Region Transportation System. Has TRPA explored the idea of using existing ski area parking lots as Park and Ride Facilities during the summer tourist season? The parking capacity exists and ski area summer season operations could gain business from the volume of customers and new visitors. Any infrastructure improvements (shelters or pull outs) could also be useful for promoting winter transit operations.

This is a great idea and something we are discussing with our partners.

2. Page 1-19: Bullet two on this page discusses a “seamless fee system for existing and any new parking facilities”. Has TRPA explored how other states such as Washington and Oregon have used “Snow Park” permits and fees for recreational parking?

These are USFS and State Parks owned areas. If you have specific examples you could provide for us to research, we appreciate it and will pass it on to those partners as well.

3. Page 2-2: Figure 2.2 on this page is not clearly referenced in the text and no explanation of the graph is provided. Please clarify.

This figure illustrates one of the two transportation related threshold indicators, traffic volumes on U.S. Highway 50. It illustrates traffic volumes are decreasing. Chapter 5 and Appendix G go into more depth on performance measures.

4. Page 2-6: Sentence four in paragraph one notes that “*Concepts for new rail and transit services with transit centers that incorporate park and ride lots are being developed and are included in the plan’s unconstrained, unfunded project list.*” Please provide a specific project name or citation to a section or page number where this information can be found.

Appendix B, B-7, first two lines.

5. Page 2-9: Please consider adding a new bullet under the themes and goals of “Coordination of transit service so it is efficient for the user.”

Thank you for this recommendation. These bullets represent common themes from public outreach conducted during the development of this plan.

6. Page 2-17, Table 2.4: The table refers to footnotes (1), (2), (3), and (4), but no footnotes were provided. Please clarify.

Thank you for noticing this error. This table is taken from the 2017 RTP environmental document, and associated footnote information can be found there. You can access the environmental document here: <http://www.trpa.org/regional-plan/regional-transportation-plan/>
Also, We’ve updated the footnote to reference this information.

7. Page 3-6: This page describes transit goals, policies and plans, but it is not clear how the existing transit systems will be integrated and coordinated in the short-term. Please explain how this will be accomplished.

Please read pg 3-11 under Transit Schedule Coordination.

8. Page 3-8, Figure 3.2: This figure illustrates existing regional transit challenges. You might consider adding a short SWOT analysis (Strengths, Weaknesses, Opportunities and Threats) to set the stage for how these challenges might be overcome. This could be combined with a gap analysis, a comparison of the current situation with the one that is desired. These two analyses could help determine where to focus priorities.

Thank you for this recommendation. The Tahoe Transportation District will soon release the Long-Range Transit Plan which goes into great detail on transit planning and analysis. Please keep an eye out for this document.

9. Page 3-12: Paragraph three on this page discusses “Transit priority access” and discusses “*Transit signal priority which allows buses to start moving before cars at signalized intersection is on the constrained list and is a first step.*” It is now clear how this would work on the narrow roads in the Tahoe area where there is not a separate transit lane. Please clarify.

This concept connects buses to signals. When they are at the head of a signal, the signal is prompted to provide them prioritization. A transit only lane is not necessary for this to occur, however we believe coupling transit only lanes with signal priority would be most successful. There are many ways to accomplish this on our limited roadways, through adaptive roadway management.

10. Page 3-13, Figure 3.4: This figure discusses the complete transit vision. Unfortunately there is no key provided to describe what the different symbols mean and most of the information is not readable. Please provide in a different format or break the map up into different segments.

We appreciate this figure is difficult to read. It is very challenging to show an entire regional transit vision on one map. The Long-Range Transit Plan will split the Region into corridors which will make it much easier to read. We’ve attached the figure to my response as it may be easier for you to review.

11. Page 3-22: Paragraph two on this page discusses employer trip reduction, but it is contained in the section that discusses trails. Please explain what this information has to do with trails or make it clear if the “Incentive Programs” heading is actually the start of a new section.

As noted on page 3-4 and in table 3.1 on 3-5, we explain that incentive strategies can be used to span various types of travel behavior as well as modes. We’ve grouped some strategies under each mode, but they can be used interchangeably. The employer trip reduction strategies can help encourage riding your bike, walking, or using transit.

12. Page 3-23: The text box at the bottom of this page discusses technological improvement. Please consider discussing improvements in diesel technology for school buses, since these contribute to PM2.5 and PM10 emissions.

Thank you for this recommendation. We'll consider it.

13. Page 3-24: The text box at the bottom of this page discusses autonomous vehicles. It is not clear how this applies to the Tahoe region since there is no clear evidence that autonomous vehicles are capable of operating in typical winter conditions for the region.

This text box is simply discussing how autonomous vehicles may impact transportation at lake Tahoe and around the world. It still remains to be seen how autonomous vehicles will impact Lake Tahoe directly.

14. Page 3-25, paragraph two: It is not clear how PEV vehicles will contribute to the regions overall reduction in GHG emission per capita if the electricity is generated using natural gas, diesel or coal. Please clarify.

Thank you for this thoughtful comment. We recommend review the PEV readiness plan when it is released, within the next few months.

15. Page 3-28, paragraph two: This section notes that "*Deployment of electric public fleets will increase health by improving air quality.*" Please explain how this statement can be true if the electricity is generated using natural gas, diesel or coal.

These are broader issues that we cannot control. Locally, increasing electric vehicle fleets at Lake Tahoe will have a direct impact on local air quality.

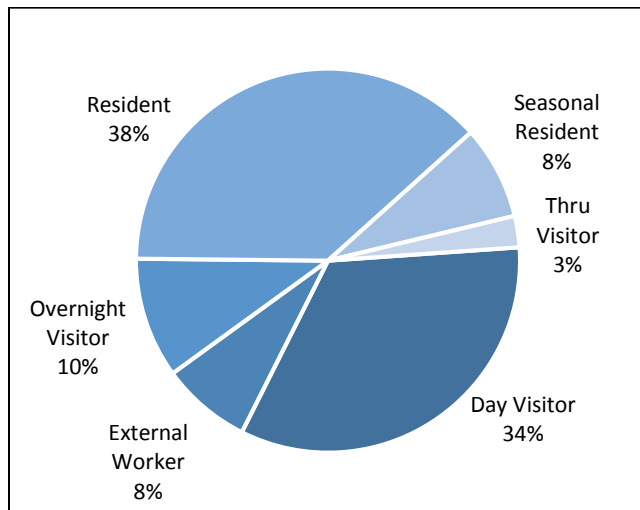
16. Page 4-7: The text box on this page describe a case study of the Maroon Bells Scenic Area in Colorado. Could this model be applied somewhere in the Tahoe region? Please clarify.

This is something we are encouraging. We are working with our partners to look at innovative strategies that will reduce congestion by encouraging travel to recreation destinations by transit.

Comments on Appendix D: Methodology for estimating vehicle miles traveled and greenhouse gas reductions in the 2017 Regional Transportation Plan

1. Page D-3: It is not clear from the model description on this page or the text of the transportation plan what percentage of vehicle miles traveled (VMT) are attributable to residents and local businesses and what percentage of VMT are attributable to visitors and visitor-based businesses.

Thanks for your comment. Please see Chart below, which contains the percent of 2014 base-year travel by traveler type, estimated by the Lake Tahoe Transportation Model.



2. Page D-4, paragraph three: There is not clear explanation provided that would allow the reader to understand how land use policies impact the transportation modeling. A simple flow chart from the 30,000ft level would suffice. I do not see a clear description of how VMT for business or commercial traffic fits into the models or if it is ignored outright. With the Tahoe Basin heavily dependent on a tourism based economy, trucks transporting groceries, other retail goods and solid waste could make up a recognizable percent of vehicle miles traveled, but I do not see it addressed in the model. Please clarify.

Vehicle Miles Traveled (VMT) is estimated by the Lake Tahoe Transportation Model and the integration of land use and transportation is included as inputs. For additional information, please see the “Lake Tahoe Resident and Visitor Model: Model Description and Final Results (2007)” available on the TRPA website here: <http://www.trpa.org/transportation/library/>.

3. Page D-24, Visitor Assumptions Section: It is not clear why Appendix D spends twenty pages discussing land use factors as part of the model but dispenses with the visitor assumptions in one and a half-pages. Since this is a plan that has a very long life it would be very valuable to address what information is incomplete or unavailable and how this lack of data can be rectified in the future. Since many other plans and CEQA reviews may eventually tier off this document and its future versions it will be important to address these data gaps. Recent NEPA case law in the 9th Circuit Court of Appeals involving the Bureau of Ocean Energy Management addressed this topic specifically and noted that if information is not available, the environmental document must discuss whether the information is critical to the agency’s decision making and what it would cost to obtain the information if it was determined to be critical to the agency’s decision making.

TRPA strives to use the best available information for its modeling inputs and as bases for its assumptions. The relative number of pages devoted to a particular topic in Appendix D does not necessarily reflect either a factor’s relative importance or the amount or quality of information available. For example, the recent acquisition of substantially more robust visitor behavior data informs the central policy direction contained in the RTP. Please see the RTP at pp. 1-15.

Hi Mr. Weber:

Thank you for sending me this comment regarding bus stop infrastructure. I've cc'd Will Garner who manages Placer County's TART system. He'll have a better sense as to plans for improving transit shelters in that area. TRPA does not build or maintain any transit shelters at Lake Tahoe.

Thank you for using public transit and walking as your main method of transport. We appreciate it!

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: bethweber@charter.net [<mailto:bethweber@charter.net>]
Sent: Wednesday, March 22, 2017 11:53 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Bus stops during winter

Hello, my name is Jim Weber, I have lived in Kings Beach since 1980. I walk everywhere I need to go. But

this January and February I had to go to Truckee for Doctor appointments. I took the Tart bus at 7 am.

Both times it was windy and snowing and cold. There was no protection for those waiting to go to Squaw or

Northstar, but right across Highway 28 there was a nice cozy Bus stop for those going to Incline Village. So

maybe in the future the TRPA can have decent Bus Stops for those people who have to wait in the cold, everyday during the winter when the buses are usually late. On everything else, I was very pleased. I will

probably be using Tart this Summer.

Sincerely,

Jim Weber

Thank you, John for your comments on the draft 2017 Regional Transportation Plan.

We appreciate your support for the plan and the many priorities that you've mentioned, including:

1. Support for Roundabouts
2. Support for closing gaps in the trail system
3. Support for free-to-the-user transit
4. Support for maintaining sidewalks and bike trails for year-round use
5. Support for Dig Once Policy

There are lots of great things happening in all the categories listed above. Please continue to support projects and policies by attending public meetings, taking surveys, and supplying comments on project proposals. If you are not already, please sign up for our transportation e-newsletter. This is a monthly newsletter that helps keep you informed on public input opportunities.

https://visitor.constantcontact.com/manage/optin?v=001te_v6vSd9jsYSW4IAZIC-n5CjBSNhdnalYBULRQ6mZZ0B6n5hkoxDWszaJ838joiOsT-kCsXPJS7rL-Nkvo8EkJ75EetTlzoCG5D42_nlwo%3D

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]
Sent: Tuesday, March 21, 2017 2:53 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: John Drum <tahoedrums@icloud.com>
Subject: [your-subject]

Message Body:

We think this is a great plan. We are very supportive of the effort to offer free transit service in the region as well as filling the gaps in the trail system for bikes and pedestrians. We hope you will encourage more Roundabouts in the Tahoe region. We need them in Meyers and in other clogged intersections. Also, please create agreements to plow the sidewalks and bike paths in the winter to allow for use. Finally, please require that conduit for fiber/broadband goes into every open trench that does not already have it. Thank you!

--

This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)

19: John Grigsby

Hi Mr. Grigsby,

Thank you very much for your thoughtful comments on the 2016 Active Transportation Plan and Draft 2017 Regional Transportation Plan.

I've responded to your comments on priority active transportation infrastructure and multi-modal transit amenities, specifically bicycle trailers.

I would encourage you to make contact with George Fink, cc'd here. He runs the transit system at TTD and is considering purchasing a bicycle trailer for Route 23. It would be great if you could lend you support on this project.

Also, if you are not already, I encourage you to sign up for our transportation e-news. It's a great way to stay up-to-date and aware of public input opportunities on projects.

https://visitor.constantcontact.com/manage/optin?v=001te_v6vSd9jsYSW4IAZIC-n5CjBSNhdnaYBULRQ6mZZ0B6n5hkoxDWszaJ838joiOsT-kCsXPJS7rL-Nkvo8EkJ75EetTlzoFZt7nbFCd2cZjiyn0pU3Q%3D%3D

Also, you may be interested in joining some advocacy groups, including the Lake Tahoe Bicycle Coalition <http://www.tahoebike.org/> or the Community Mobility Group: <http://sustainabilitycollaborative.org/how-we-work/community-mobility-cm/>. Both are very in South Lake Tahoe.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: John Grigsby [<mailto:johnngg@evil-genius.com>]

Sent: Friday, March 24, 2017 4:49 PM

To: Morgan Beryl <mberyl@trpa.org>

Subject: My comments on the Draft 2017 Regional Transportation Plan

Dear Mr. Beryl:

I've attached my comments as an .rtf file (openable by MS Word, and even WordPad and TextEdit), as the formatting makes it much easier to read.

Please let me know if you have trouble with the file and I can resubmit as plain text, or in another format.

Thank you,
John Grigsby

3/24/2017

To: Morgan Beryl, Senior Transportation Planner, TRPA

Subject: My comments on the Draft 2017 Regional Transportation Plan

Dear Mr. Beryl:

I have lived in South Lake Tahoe for over seven years, and visited the lake for over a decade before that.

In general, I support the proposed Regional Transportation Plan and its components, and find its vision laudable. As a local resident who frequently uses the current transit system in both summer and winter in addition to driving my car and riding my bicycle, I understand the strengths and weaknesses of the current transportation network. Accordingly, I offer the following clarifications and specific action items to the Active Transportation Plan component of the RTP.

(For an executive summary, please see Part V: Executive Summary and Action Items, at the end.)

Overview

Briefly, the vision of the ATP is to create a better Tahoe experience, for both residents and visitors, by allowing people to get from place to place without driving their cars. (This is for both environmental and traffic/quality of life reasons, which we all understand and I won't rehash.)

On pages 1-22 and 1-23 of the ATP, we find the following surprising statistics: *even though 97% of respondents own or have access to a car, bicycles are the most preferred travel mode in the Lake Tahoe basin!* In contrast, only 10% (less than a fourth as many) would prefer to use public transit to get around the Lake.

Therefore, it's clear that our transportation network - including public transit - must be viewed as a way to enable both residents and visitors to ride their bicycles to and from destinations they would otherwise have to drive to and from, and not as an end in itself.

Stated more clearly: in addition to creating bike paths and bike lanes so that cyclists can ride safely around town and to trailheads, *our bus system must enable cycling, the preferred mode of transport around the Lake, by transporting cyclists - including their bicycles - to and from common recreation, education, and work destinations.*

Part I: Bike Paths

Our first priority needs to be a safe way to traverse Highway 50 through town, from Elks Point

Road (the Zephyr Cove shopping center) all the way to the Y, and beyond it to Baldwin and Pope Beaches. In my seven years of experience as a local cyclist, the most dangerous parts of the current network are:

1. *From Lake Parkway to Elks Point Road in Nevada.* Speeds are high, and drivers inattentive, since they're still outside town. I refuse to ride between Kahle Drive and Elks Point Road anymore after nearly being run over multiple times. (Yes, there exists a sort of path on the north side of the highway between Lake Parkway and Dart Liquors, in front of Edgewood Golf Course: it's gravel, and has random utility access pits in it.)

We agree this stretch of roadway needs to be redesigned to at least include a bicycle lane, but preferably a shared-use path. We have made requests to NDOT on this matter, and know NDOT is looking at complete street improvements within this corridor. Check out this project and keep your ears open for some public feedback opportunities:

<https://eip.laketahoeinfo.org/Project/Summary/03.01.02.0108>

I believe NDOT is preparing to conduct public outreach soon.

2. *The multiple breaks in the path system from the Marina to the west end of Lakeview Commons.* The path empties out onto dirt and tree roots on the east side of Lakeview Commons, three-inch-wide cracks, huge frost heaves, and awkward curb cuts make it dangerous for road bikes, and there are light poles and benches right in the middle of the path.

Great news! The City of South Lake Tahoe will be building a shared-use path from Common's Beach to Ski Run this summer.

3. *The area from the Y, and the motels south of it, up to the Pope Bike Path.*

Caltrans has just improved this area with shoulders (bike lanes in some areas) and sidewalks from the Y to 15th Street, which then connects to the existing shared-use path.

To be clear, the entire proposed network is wonderful - but I view these elements as the highest priority.

Part II: Why We Need Multimodal Transit

It is axiomatic that one cannot force either residents or visitors to use public transit. It is also axiomatic that use of transit depends on both *frequency* and *reach* - how many people are usefully served at each stop. Since cycling is much faster than walking, cycling also dramatically increases the *reach* of transit...

...but only if people can bring their bicycles with them. Otherwise the reach improvement only exists on one end.

(Disallowing bicycles on transit poses many other problems. Even to enable half the reach improvement, sufficient racks must be installed to securely lock one's bicycle at every single bus stop. This is expensive, and due to space restrictions at most bus stops, impossible. Additionally, many visitors and residents have very expensive bicycles which they will refuse to leave anywhere, even locked. Page 1-24: "Out of the 662 respondents for the 2015 Active Transportation Plan Survey, roughly 62 percent indicate they ride their bike in general, and of those, 27.5 percent have an income of \$100,000 or higher.")

Most importantly, we already know that *cycling is the most preferred mode of transit in the Basin*. To reiterate:

Our bus system must enable cycling by transporting mountain and road cyclists - including their bicycles - to and from common recreation, education, and work destinations.

We want to enable residents and visitors to park their car at their home or hotel, get on their bicycle, and ride safely to their destination. If their destination is too far away or too difficult to get to, we want to enable them to bring their bicycle on the bus.

Sample use case: A group of mountain bikers are staying in or near the Village and want to ride the Tahoe Rim Trail. They take their bicycles to the transit center, get on the 23 bus, get off at Eagles Nest, ride the Rim Trail to Cold Creek and then back to town. This would otherwise require a two-car shuttle.

Sample use case: a family of tourists is staying in or near the Village. They want to see Pope Beach and Camp Richardson. They take their bicycles to the transit center, get on the 50 bus, get off the bus at the Y, and ride the remaining couple flat miles down the Pope Bike Path to the beach. This would otherwise require a round-trip via car, and they would likely encounter a full parking lot and much frustration. (Remember, it's a mile just from the highway to the beach and back! Even if you run the bus all the way out to Camp Rich, that's a long walk. People need their bicycles on both ends of the trip.)

Part III: The Current Transit Configuration Is Unusable For Cyclists

The Tahoe Transportation District banned bicycles on the bus several years ago, for reasons that remain unclear. This means that only two cyclists (or three, in the case of the 50 bus) can board each bus, and the rest are simply denied boarding, with no alternative. **This means that the entire capacity of the Tahoe bus system is, quite literally, two bicyclists per hour on most routes.**

First, this makes it impossible to use the bus for a work commute, since one cannot depend on actually boarding the bus at any specific time. You can't just call into work and say "Hey, two guys got on before me and the next bus is in an hour, sorry."

Second, this makes it impossible for a family of cyclists to use the bus at all.

Third, it makes it practically impossible for any cyclist to use the bus. I have been denied boarding on the 23 bus for four hours in a row on a Thursday afternoon in late October... imagine the situation during peak times! (I've watched cyclists nearly come to blows at the Transit Center over who gets the two spots on a weekend morning.) I also know for a fact that, while usage of the bike rack is tracked, statistics are *not* kept for those denied boarding because the rack is full...

...and when bicycle space is such a scarce and rarely available resource, people stop trying to use it, because they know it very likely won't be available to them. It's like opening a homeless shelter that can only take two people out of the dozens that show up, and then saying "Well, the line is much shorter now, so clearly the homeless don't need our help."

Part IV: How To Increase Transit Bicycle Capacity: Nuts and Bolts

I've been told that, for insurance and safety reasons, the most realistic alternative for increasing transit bicycle capacity is bicycle-carrying trailers. As a cyclist and frequent user of transit, I support this strongly, because I see the following advantages:

1. *Flexibility.* The trailers can be moved to the routes and buses that need them most, and removed when not needed (e.g. winter on the 23 bus, any of the Heavenly ski shuttle routes.)
2. *Capacity.* One can easily fit a dozen or more rack spaces on even a small trailer, and far more on a large one...which can easily become necessary during peak holiday periods like July 4!
3. *Cost.* A few bike trailers costs much less than any alternative I can think of - even far worse ones, like trying to install permanent lockable racks at every bus stop in and outside of town.

I can see several potential designs for such a trailer. Space doesn't permit me to fully describe all of them - but again, as a cyclist and frequent transit user, *I am a typical use case, and would greatly appreciate the opportunity to work with the District to make sure these trailers actually serve the needs of cyclists!* (Few things are more disheartening than seeing scarce resources spent on infrastructure that is effectively useless because the implementors didn't talk to the people who would actually use it.)

However, let me point out a few important characteristics:

1. *Must accommodate modern bicycle designs.* The racks currently on the buses don't even fit many current mountain bikes (the rack is too short), let alone fat bikes, recumbents, or beach cruisers. I have to carry a bungee strap just to make sure my conventional, skinny-tired mountain bike doesn't fall out of the rack! The rack design should accommodate modern bicycles with 4"-5" tires and wheelbases of nearly 50".
2. *Optional lockability.* Bicycles can easily cost thousands of dollars - and even if it's unlikely for someone to grab one off the trailer while the bus is stopped at a stoplight in town, or at a bus

stop, it's a source of stress and doubt that will no doubt cause some potential riders to decline ridership. The rack and trailer design should allow cyclists to lock their bicycle while they ride the bus, if they choose.

Again, please consult me on the design. I'm an engineer by trade, a frequent cyclist, and I can help everyone involved make this a successful program that other cities will no doubt wish to emulate in the future!

Federal and state laws prohibit more than 2 or 3 bike racks on buses depending on the size of the bus. However, that does not mean there are no other solutions, as you suggest. I know that TTD has been working on possibly using bike trailers, specifically on Route 23. To find out more and lend your support, please contact George Fink: gfink@tahoetransportation.org.

Part V: Executive Summary, Action Items

- Bicycles are the most preferred travel mode in the Lake Tahoe basin, exceeding even cars.
- Therefore, bicycle infrastructure improvements should be first priority of the items in the ATP.

Priority areas of bicycle lane and path infrastructure to address:

- Highway 50 from Lake Parkway to Elks Point Road in Nevada.
- The multiple breaks in the system in Highway 50 from the Marina to the west end of Lakeview Commons.
- The area from the Y, and the motels south of it, up to the Pope Bike Path.

Priority area of transit infrastructure to address:

- Public transit is one of the least preferred transportation alternatives. It must enable bicycle travel rather than attempting to substitute for it. *"Buses have sufficient bicycle carrying capacity"* - Page 2-7 of the ATP.
- **Solution: Add bike rack trailers to TTD buses.** Consult with myself and other local cyclists before designing and purchasing, to ensure the design serves cyclist needs.
- **First priority and probable test case: the 23 bus.** Next priority: the 50 bus.

Thank you for your time and attention!

Sincerely,

John Grigsby

POB 10897

Zephyr Cove, NV 89448

johngg@evil-genius.com

Ms. Biasotti:

Thank you very much for your comment on the Draft 2017 Regional Transportation Plan. We very much appreciate your support of the work we and our partners are undertaking to transform Tahoe transportation. We hope you'll continue to be involved and participate in public outreach activities as projects continue to come before the public.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]
Sent: Friday, March 17, 2017 11:59 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Kathryn Biasotti <kbiasotti@bartonhealth.org>
Subject: [your-subject]

Message Body:

Very encouraged by the collaboration and movement in the right direction for transportation around/ in and out of our basin. The cross agency interaction to build bike trails and enhance our visitor experience is very exciting especially for a 29 year Tahoe Local.

--

This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)

Hi Mr. Starr:

Thank you for your comment on the Draft 2017 Regional Transportation Plan. I have been coordinating with the USFS on the SR 89 Recreation Corridor Improvement Project as well as with Kim Caringer / Mike Vollmer on the Lake Tahoe West project. We are well aware of the many concerns regarding back country access. We recommended to the USFS to make contact with the Tahoe Backcountry Alliance once they are ready to form a project development team to delve more deeply into the planning phase of this project. If you would like to express your interest in participating, please contact Anjanette Hoefer (cc'd).

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Kevin Starr [<mailto:kmstarr@gmail.com>]
Sent: Wednesday, March 08, 2017 1:55 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: regional transportation plan

Hello Morgan,

Thank you for the opportunity to comment on the TRPA Regional Transportation Plan.

I have briefly read through the summary of the State Route 89 Recreation Corridor Improvements and couldn't find mention of any planning that is going into winter parking and access to Desolation wilderness in the winter months. As I'm sure you are aware, there were recently reductions in summer pullouts along the highway that have been traditionally plowed in the winter and used for parking by winter recreationists. There was historic use of these pullouts for at least the last 25 years and no alternative parking was given to replace what was taken away.

In planning for the future, please don't overlook the need for winter parking and access along the West Shore.

Regards,
Kevin Starr

Hi Kira:

Thank you for your comments on the Draft 2017 Regional Transportation Plan.

Thank you for your feedback regarding the need to prioritize 15 minutes frequencies on select transit routes and the need to provide transit only lanes. We appreciate your support of the Region's multi-modal focus and long term plans for mobility hubs.

We'll include this correspondence in our public record for the plan.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Kira Smith [<mailto:kirafsmith@gmail.com>]
Sent: Tuesday, March 07, 2017 5:56 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: RTP Public Comment

Hey there! I just finished reading through the RTP and I think it's great!

I appreciate how much this plan emphasizes multi-modal transportation because that is something that is so unique to the Tahoe Basin and something that residents and visitors can all take advantage of. I also really like the app idea, particularly that it's intended to show users how their choices impact the environment.

Love the investments in frequency and I think 30 min headways are definitely needed. I know that 15 min headways are planned for major corridors long-term, but I think this should be a priority when additional funding is available. I also love that mobility hubs are part of this long-term plan. These are popping up all over the country and I think they really solve the first-last mile issue that a lot of public transit users face.

Bus only lanes will vastly enhance the transit network and give transit a leg up against other transportation modes to encourage travelers to opt for transit, so I hope this is prioritized on some of these corridors. It would even be great to have this during peak periods in South Shore, but I know that probably isn't feasible, so transit signal priority would improve transit use here and I like how that is included.

Anyways, just wanted to give you props on the plan! I think it goes a long way and sets the stage for long-term environmental and congestion improvements.

P.S. Dig the maps!

Best,

Kira Smith

23: Lake Tahoe Bicycle Coalition

Dear Chris and Lake Tahoe Bicycle Coalition Board Members:

Thank you very much for your letter of support for the draft 2017 Regional Transportation Plan. We appreciate your partnership in delivering awareness programming through the Bike Safe Lake Tahoe! campaign, the Lake Tahoe Bike Challenge, and producing and distributing the Lake Tahoe Bike Map. We look forward to continuing to work with LTBC to incorporate some of your worthwhile efforts into our transportation demand management programs.

Sincerely,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Chris Carney [<mailto:chris.n.carney@gmail.com>]
Sent: Friday, March 24, 2017 9:26 AM
To: Morgan Beryl <mberyl@trpa.org>
Cc: Charles W. Nelson <chasbikes@sbcglobal.net>; Gavin Feiger <gavin.feiger@gmail.com>; Kansas McGahan <KMcGahan@placer.ca.gov>; Nanette Sartoris <nanettesartoris@hotmail.com>; Curtis Fong <tgft@bikethewest.com>; Sherry Hao <sherryhao@gmail.com>
Subject: LTBC comment letter re: Linking Tahoe

Dear Ms. Beryl,

Please find attached a letter from the Lake Tahoe Bicycle Coalition with our comments on the draft Linking Tahoe: Regional Transportation Plan.

Sincerely,

Chris Carney, President
Lake Tahoe Bicycle Coalition



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

Board of Directors Officers

Chris Carney, President
*Communications Manager,
League to Save Lake Tahoe*

Curtis Fong, Vice President
Event Director, TGFT Productions

Nanette Hansel, Treasurer
*Sr. Project Manager,
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Sherry Hao, Secretary
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Tahoe Regional Planning Agency*

Karen Fink
Consultant

Peter Fink
*Tahoe Area Mountain Biking
Association*

Marina Marengo
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Adam Turner
Vail Resorts, Retail

Garrett Villanueva
*Acting Regional Trail Program
Manager, US Forest Service*

Jaime Wright
*Executive Director, Truckee North
Tahoe Transportation Management
Association*

Morgan Beryl
Senior Transportation Planner, TRPA
Via email: mberyl@trpa.org

Re: 2017 Regional Transportation Plan Comment

Dear Ms. Beryl,

We are writing to support the adoption of the Draft 2017 Linking Tahoe: Regional Transportation Plan. We appreciate the opportunity to comment on this important proposal.

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

We applaud Ms. Beryl and the staff of the Tahoe Regional Planning agency for the development of the draft RTP, in particular for their thoughtful and forward-thinking approach to improving infrastructure for people riding bicycles in Tahoe. We also appreciate the extensive opportunities for public input that TRPA has provided to the Bicycle Coalition and to the public in general.

Improving Tahoe's network of bike routes and trails contributes to our status as a world class tourism destination for outdoor activities, which 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 our 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.

To note a few key projects we are pleased to see in the draft RTP, and which we strongly support, we would highlight the following examples:

- Projects that improve connectivity within our communities, such as the proposed enhancement to bicycle facilities as part of the Fanny Bridge overhaul (Phases 1 and 2) and the South Tahoe Greenway Shared Use Trail,

- Projects that have associated Safe Routes to School benefits, such as the AI Tahoe Safety and Mobility Enhancement Project, and
- Projects that allow residents and visitors alike to discover the Tahoe Basin's special outdoor destinations, such as the proposed sections of the Nevada Stateline to Stateline Bikeway that will connect Incline Village to Sand Harbor, and later Sand Harbor to Spooner Summit.

Regarding 01.01.02.003, the U.S. Highway 50 Water Quality Improvement Project - "Y" to Trout Creek (SHOPP), we urge TRPA to use every means to ensure the project proceeds in a manner that includes adequate bicycle lanes and improved safety for people crossing Highway 50 by bicycle or on foot.

Thank you for the opportunity to provide these comments.

Sincerely,

Chris Carney, President
Lake Tahoe Bicycle Coalition



Mail

PO Box 5310
Stateline, NV 89449-5310

Location

128 Market Street
Stateline, NV 89449

Contact

Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 10, 2017
TO: The League to Save Lake Tahoe: Shannon Eckmeyer, Esq. and Marissa Fox, Esq.
FROM: TRPA Staff
RE: Response to League to Save Lake Tahoe Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Eckmeyer and Ms. Fox:

Thank you for the League to Save Lake Tahoe's (The League) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your recognition of the forward-thinking concepts within the plan and that it represents tangible progress for the Tahoe Region. We have responded to each of your comments, questions, and recommendations below.

CATEGORY: Bolstering RTP policies and including additional solutions will contribute to the success of this Plan.

1. League Recommendation: The RTP should incorporate more aggressive parking management strategies similar to those included in the 2012 RTP.

The parking management policies in the 2017 RTP/SCS carry forward the 2012 RTP approach with enhancements to reflect contemporary best practices. Rather than pull back, the 2017 RTP/SCS policies further encourage innovative parking management strategies at Lake Tahoe. As Attachment A: Goals and Policies Crosswalk of the IS/ IEC illustrates, policies referring to parking management have been strengthened. Additions have been made for technology opportunities. Other amendments add parking management strategies to area plans. New policies added since 2012 emphasize the importance of parking management strategies in town centers, at high use recreation destinations, and along constrained corridors where shoulder parking is currently presenting safety and environmental issues. All of these changes provide much stronger grounds to implement more aggressive parking management strategies than the 2012 Plan.

In your letter, you reference the TRIA tool and state the analysis "omitted assumed reduction in minimum parking requirements." As you will see Appendix D of the Draft 2017 RTP/SCS pages D-30 through D-31 as well as table D-19 parking management strategies implementation is included as a reduction consistent with the 2012 RTP analysis.

Under this item the League also suggests adopting two additional policies regarding parking management, they are:

- **The RTP should eliminate minimum parking requirements and impose maximum parking requirements.**
- **The RTP should implement dynamic, demand-based parking pricing.**

Thank you for the suggestions. While each policy on its face appears workable, neither is well suited to the RTP. But other included policies can be relied upon to accomplish the same result.

- First, there is no regionally suitable, one-size fits all maximum parking standard. The better avenue for implementation of the approach is thru local government Area Plans.
- TRPA does not have minimum or maximum parking standards. Parking standards are set only by local jurisdictions through area plans and local codes. Existing TRPA policies and code require local jurisdictions to analyze parking and include parking measures to encourage walking, biking, and transit development of area plans.
- The 2017 RTP/SCS policies support the implementation of dynamic, demand based pricing. Nonetheless paid parking must be implemented and operated by an entity with ownership of the property or through agreements with property owners. TRPA does not have authority to require or collect fees for paid parking but local governments and land managers do. TRPA is working closely with many public land managers, the Tahoe Transportation District, and local jurisdictions to identify locations where dynamic, demand-based parking is appropriate. We agree demand-based paid parking can be a tool to help generate necessary funds to support transportation improvements and provide the incentive / disincentive system to encourage transit or disperse people's destinations during peak periods.

Overall, the Tahoe Region is seeing progress in this area. Parking studies focused on shared parking and pricing elasticities have been conducted in Placer and Washoe Counties. The Placer Area Plan has newly adopted progressive parking management strategies within it's policies and in proposed projects within the draft 2017 RTP/SCS. As an example, the Tahoe Transportation District in partnership with Washoe County, NV State Lands, and others are building off highway parking amenities within the SR 28 corridor including fees for off street parking while restricting highway shoulder parking and incorporating real-time technology to provide parking availability information to users before they choose to drive to destinations. TRPA will continue to develop these and other aggressive parking management solutions with our partners.

2. League Recommendation: Private investment in transit is essential to implementing sustainable transportation solutions.

TRPA wholeheartedly agrees with this assertion and supports public private partnership whenever possible. The League's letter discusses the Employer-Based Trip Reduction program. TRPA's program, first established in 1992 is incorporated into the code and is badly in need of an update to reflect more current feasible transportation demand management methods that use innovative technology and are supported by strong partnerships with the private sector, non-profits, advocacy groups, and local jurisdictions. As we discussed at our February 10, 2017 meeting, TRPA encourages the League to take an active role in the update of these programs and possibly TRPA code modifications to reflect best practices.

3. League Request for Information: The League supports transportation pilot projects and requests further information on the Emerald Bay Pilot Project.

The League's support of pilot projects is noted. Phasing project delivery lends success to many projects as it allows implementers to be adaptive as challenges arise and solutions are delivered. The referenced project is the "SR 89 Recreation Corridor Improvement Project," EIP project

number 01.01.03.0036 and is in the early stages of planning and funding solicitation. As shown in the EIP Tracker and in Appendix B of the Plan, the SR 89 Recreation Corridor Improvement Project is on the 2017 RTP/SCS constrained list under the Corridor Revitalization category and is estimated to cost \$5 million dollars, which includes all phases of planning and implementation. Expected performance measures include miles of roads decommissioned or retrofitted, pounds of air pollutants removed or avoided by project, and tons of greenhouse gases reduced. As you are aware, this project is included in a recent appropriation request the League supported under the 2016 Lake Tahoe Restoration Act.

Planning is already underway. In the fall of 2016, with support from the TRPA Governing Board EIP Committee, TRPA proposed the pilot project along the SR 89 Recreation Corridor. Staff immediately began coordinating with the U.S. Forest Service to outline options to include in the project that would prioritize and increase transit access, manage parking, and implement adaptive roadway management tools. We encourage the League to lend support to the U.S. Forest Service, as the lead agency for the planning of this project.

4. League Recommendation: Vacation home rentals undermine the RPU and RTP and must be regulated by the TRPA.

The League recommends adding “all overnight uses” to Policy 1.6. The draft policy already incorporates all major commercial interests. TRPA is involved in a number of housing forums. We anticipate public discussion on the concerns of residential building allocations and possible land use policies. TRPA and partners will be working with all major commercial interests that manage vacation home rentals through transportation demand management programs focused on encouraging active transportation and transit as a means for getting around Tahoe.

5. League Recommendation: Clarification and information needed on transit infrastructure and roadway structures.

Under this item the Leagues suggests the following:

- **Transit infrastructure should prioritize transit lanes before or alongside transit signal priority. There should also be clarification on regional signal timing.**

The draft 2017 RTP/SCS includes three projects that will work in tandem to deliver a more efficient operated roadway system for U.S. Highway 50 on the South shore of Lake Tahoe. These projects, though listed individually may be delivered as one bundled project, or may be delivered in phases. These include:

- A. Constrained List: EIP Project Number 03.01.02.0106: Transit Signal Priority Along South Shore
- B. Constrained List: EIP Project Number 03.01.02.0078: California Multi-Modal Signal Control Optimization
- C. Unconstrained List: EIP Project Number 03.01.02.0133: Adaptive Traffic Management on U.S. Highway 50

As noted in the draft plan, TRPA works with implementing agencies to bundle projects as much as possible to decrease impact on roadway users, reduce costs and duplication of work, and deliver more comprehensive projects. There are times when lead agencies need to phase implementation to continue incremental progress as quickly as possible. Through discussions with Caltrans and transit operators, signal-preemption is a necessary and easier first step in

prioritizing transit at Lake Tahoe. That being said, TRPA is already working with partners on applying for funding that could bundle all three of the projects listed above into one study to assess best practice tools, cost / benefit, and recommendations for implementation.

The League's letter also comments on existing signal timing and coordination along the South Shore. Please see the attached Caltrans map of existing signal coordination (Attachment B).

The League also suggests **“Clarification is needed on currently approved and soon-to-be reviewed roadway projects as they will actually increase capacity for private automobile use (and likely VMT).”**

Both the U.S 50 Community Revitalization Project and the SR 89 Fanny Bridge Community Revitalization Project are EIP projects design to deliver multiple benefits. Each is targeted to reduce congestion at known chokepoints, increase safety and attractiveness for walking, biking, and using transit, improve flow for goods movement, and support economic vitality by creating a community-friendly main street. Coupled with the limited amount of proposed new roadway, both projects also reduce speeds and provide traffic calming that limit capacity in the existing roadway sections that are circumvented. The EIS for the Fanny Bridge project analyzed and accounted for VMT. The soon to be released U.S. 50 Project EIS will also analyze VMT impacts.

Under this item the League also requests **“Additional information is needed on Lake Tahoe specific traffic design volume.”**

Implementing agencies, such as Caltrans, NDOT, and local jurisdictions often use state standards or peak of the peak traffic volumes to assess and design roadway improvement projects, such as the size and number of lanes within a roundabout. It can be difficult to apply Tahoe relevant design volumes for this analysis, because no “Tahoe specific” design volume has been established. To date, design volumes must be reduced project-by-project to continue to encourage projects that meet goals and policies to manage congestion, prioritize transit, and increase safety and access for bicyclists and pedestrians. TRPA is already working with both state DOTs on recognizing Tahoe appropriate design volume standards for the Region, rather than addressing it project by project. We welcome The League's support of this effort.

6. League Recommendation: Additional suggestions to RTP Goals and technical corrections.

The League suggests that the VMT and greenhouse gas reduction targets are weakened from 2020 to 2035. This is inaccurate. The targets set by the California Air Resources Board (CARB) reflect the assumption of visitation and population growth, and associated VMT. TRPA is currently working with CARB to reevaluate the GHG reduction targets applicable to for the 2021 RTP/SCS, to respond to more stringent CA statewide GHG reduction goals recently enacted. Additionally, the League states that “there is no clarification as to why the emissions are actually increasing...” This is inaccurate. All of the assumptions and explanations of those assumptions are in Appendix D.

The League also suggests that storm drains are not consistently maintained on a regional level. Maintaining storm drains and reducing stormwater runoff is the responsibility of local jurisdictions and roadway operators such as the State departments of transportation under both TMDL regulatory requirements and Public Works budgets. All entities are working diligently to comply with stormwater management to meet TMDL requirements, including storm drain

maintenance. The 2017 RTP/SCS emphasizes the importance of roadway and water quality infrastructure maintenance. In the draft 2017 RTP/SCS, five percent of foreseeable revenue is planned specially for roadway water quality projects. Additionally, many corridor revitalization and active transportation projects include improvements to stormwater management.

The League reiterates previous comments to consider adding the words “restore” to Goal 1, and “sustainable” to Goal 4. TRPA staff appreciates the feedback but does feel these items are covered. The intent of the first goal is clear using the existing proposed language, “protect and enhance.” Goal 4 focuses on the importance of coordinated operations and congestion management which support sustainability. Sustainability is covered all through the 2017 RTP/SCS and provides the foundation of the plan and each Goal.

CATEGORY: Effective oversight and ongoing coordination among local jurisdictions and agencies is essential to the RTP’s success. Implementation of the RTP relies on information referenced in currently unavailable TTD plans.

In the multi-layered work of transportation planning, the relationship between the RTP, which is a general policy framework plan, and much more detailed later implementation plans, such as corridor plans, can be confusing. The RTP does not “rely” on information from the Corridor Plans. The RTP policies guide the development of further details in modal plans, corridor plans, area plans, and project specific studies. The cascade of plans moves from the general to very specific at the project design level. TRPA works closely with the Region’s transit operators and local jurisdictions while developing area-specific implementation plans and projects. The information located in the draft 2017 RTP/SCS combines all known inputs and is the most up-to-date information available. The RTP is at the top of the planning hierarchy and uses goals, policies, and priorities to guide what other plans and projects must address. The RTP prioritizes free-to-the-user transit, increased transit frequency and expanded season and hours of operation, increased transit access to recreation destinations and neighborhoods, closing gaps on shared-use paths for active transportation, and technology to provide real-time information and incentivize behavior change that disperse when, where, and how people travel. The specifics of how these priorities will be delivered are encompassed in the projects listed in the constrained and unconstrained project lists in Appendix B and further elaborated on the EIP Project Tracker.

1. League Recommendation: “No Net VMT” Policy suggestion & Uncertainty surrounding the status of both the VMT Threshold indicator and implementation of the RTP support an interim “no net VMT” policy

The League reiterates its desire for a “no net VMT” policy. The suggestion while attractive on its face may have unintended consequences and may not yield the desired aim of reducing and managing traffic and congestion. Such a policy would likely stop most redevelopment projects needed to support the implementation of Area Plans and the TRPA Regional Plan. For example, the recently adopted Tahoe City Lodge project enthusiastically supported by the League as environmentally beneficial could not have been approved. Additionally, existing policies and codes are already shaping projects to use innovative solutions to reduce VMT, such as supplying visitors and residents transit passes and indoor bike parking as part of hotel stays or leases. As you note, the Tahoe City Lodge is a great example of this type of project that was designed using existing policies and codes.

In the many meetings between TRPA and the League on VMT, the League has often advocated to use VMT as a water quality metric. This question is currently being addressed through the Transportation Measures Working Group in which the League is participating. The VMT

threshold indicator is established to assess nitrogen deposition into Lake Tahoe. The Working Group will consider possible transportation metrics to measure other factors of concerns such as congestion, water quality, air quality and more.

A “No net VMT” policy would also likely require extensive environmental review since slowing environmental redevelopment could potentially have environmental impacts beyond the VMT it is targeted to limit.

2. League Recommendation: Bay Area region should be included as part of the RTP as it is unknown if it will be incorporated into the TTD plans.

The Bay Area region’s connection to Lake Tahoe transportation is incorporated into the draft 2017 plan. The plan frequently underscores the major drive up market from the Northern California area and the need to work with mega-region partners to leverage funds, projects, and transportation demand management programs to encourage visitors to use transit or rail when visiting the Tahoe Region. As noted in the plan, this work is already underway. A coalition of mega-region partners is now established and TRPA expects the 2021 Regional Transportation Plan to include more clearly defined projects that will enhance inter-regional connections.

CATEGORY: Congestion Management Process is unknown creating uncertainty to RTP implementation.

Though the Congestion Management Process (CMP) is under development, it may not be appropriate to claim uncertainty is created for the RTP. The CMP is a requirement for urban MPO’s like TRPA and being new is not yet well understood by stakeholders. The CMP is a requirement to monitor and report on system and project level performance, and ensure that the direction of funds is allocated to projects that contribute the most to better managing congestion at Lake Tahoe. TRPA already monitors and reports on various transportation measures and awards transit funds based on system performance. In this respect, the CMP builds on the way TRPA has monitored transportation system performance for decades. As a first step TRPA convened the Transportation Measures Working Group to collaboratively review current measures to ensure the best measures are used to determine transportation system’s success. The League is actively participating in the Working Group. Additionally, TRPA is piloting its performance assessment tool with implementing agencies. Once finalized, the tool will be used to allocate transportation funds directly through a competitive grant process.

TRPA appreciates the League’s comments on the draft 2017 Regional Transportation Plan and looks forward to working together to improve transportation demand management programs, transportation measures, and plan projects that help the Region meet the 2017 RTP/SCS goals and policies.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

2017/2012 RTP POLICY CROSSWALK

2017 GOAL	2017 POLICY	2012 POLICY			JUSTIFICATION
ENVIRONMENT	Protect and enhance the environment, promote energy conservation, and reduce greenhouse gas emissions.				
	1.1 Support mixed-use and transit oriented development that encourages walking, bicycling, and easy access to existing and planned transit stops.	1.1 Support mixed-use that encourages walking, bicycling, and easy access to existing and planned transit stops in Centers.	4.2 Provide transit facilities that encourage transit, bicycle, and pedestrian usage.		4.2 was removed as the link between active transportation (bicycle and pedestrian) and transit facilities is included in policies of the Active Transportation Plan and is duplicative of 2012 Policy 1.1
	1.2 Leverage transportation projects to benefit multiple environmental thresholds through integration with the Environmental Improvement Program.	1.4 Develop and implement a Sustainable Communities Strategy (SCS) to meet TRPA thresholds and other statutory requirements.	1.5 Support sustainable transportation infrastructure and operational programs that provide environmental and community benefits.	13.2 Integrate transportation programs into the Environmental Improvement Program (EIP).	A Sustainable Communities Strategy is adopted in concert with the regional transportation plan, and threshold attainment is included in 2016 policy 1.2, therefore policy 2012 1.4 is not needed. 2016 policy 1.2 replaces 2012 policy 1.5 as sustainable transportation and infrastructure is a primary component of the regional transportation plan and explained in other chapters. 2016 policy 1.2 also replaces 13.2 in reference to the Environmental Improvement Program.
	1.3 Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses by prioritizing projects and programs that enhance non-automobile travel modes.	1.2 Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses.	1.3 Consider non-automobile travel modes when mitigating traffic-related project impacts.		2012 policies 1.2, 1.3, and 10.5 were combined into 2016 Policy 1.3 which addresses development impacts and mitigation -prioritizing those non-automobile mitigation programs
	1.4 Facilitate the use of electric and zero emission vehicles and fleets by supporting deployment of vehicle charging infrastructure within the Region, and supporting incentives and education of residents, businesses, and visitors related to the use of electric and zero emission vehicles.	4.4 Use alternative fuels to the maximum extent feasible in public transit fleets.	9.3 Encourage rental car providers to offer vehicles that are low- or zero-emission within the Tahoe Region.		2012 policy 4.4 is now included in 2016 policy 1.4. The alternative fuel policies were revised to focus on electric and zero emission vehicles. The language more broadly supports multiple types of incentive programs and vehicle types. This updated language also incorporates Placer county's comments during TAC member review.
	1.5 Require major employers of 100 employees or more to implement vehicle trip reduction programs.	9.1 Require major employers to implement vehicle trip reduction programs. Such programs could include: carpool and vanpool matching programs, employee shuttles, on-site secure bicycle storage and shower facilities, flexible work hours, and parking and transit use incentives.			The 2016 policy now clarifies that large employers are those with 100 or more employees as specified in the TRPA Code of Ordinances. Examples of incentive programs have been deleted for continued flexibility with best practice research. No changes to the code occurred from 2012 to 2016.
	1.6 Require new and encourage existing major commercial interests providing gaming, recreational activities, excursion services, condominiums, timeshares, hotels, and motels to participate in transportation demand programs and projects.	7.2 Require major commercial interests providing gaming, recreational activities, or excursion services to provide or participate in joint shuttle services or provide transit use incentives to their guests or patrons; and require connections with intermodal transportation facilities.	9.4 Require new, and encourage existing condominiums, timeshares, hotels, and motels to participate in public transit and/or private shuttle programs, and provide transit information and incentives to their guests and residents.		These policies were combined to eliminate redundancy.
	1.7 Coordinate with the City of South Lake Tahoe to update and maintain an Airport Master Plan and limit aviation facilities within the Tahoe Region to existing facilities.	12.2 Limit aviation facilities within the Tahoe Region to existing facilities.	12.1 Update and maintain an Airport Master Plan.		These policies were combined to eliminate redundancy and clarify roles and responsibilities.
	1.8 Strongly encourage traffic calming and noise reduction strategies when planning transportation improvements.				This policy was added to support environmental thresholds and to be consistent with Area Plan policies.
	1.9 Develop and implement a cooperative, continuous, and comprehensive Congestion Management Process to adaptively manage congestion within the Region's multi-modal transportation system.				This policy was added to be consistent with Area Plan policies and new FAST Act requirements designating the Tahoe Metropolitan Planning Organization as a Transportation Management Agency serving a population greater than 200,000 people.

2017/2012 RTP POLICY CROSSWALK

CONNECTIVITY		Enhance and sustain the connectivity and accessibility of the Tahoe transportation system, across and between modes, communities, and neighboring regions, for people and goods.			
	2.1 Coordinate with Federal, state, and local government as well as private sector partners to identify and secure adequate transit service funding that provides a viable transportation alternative to the private automobile for all categories of travelers in the Region.	5.2 Seek cooperation from neighboring jurisdictions to expand non-automobile transportation to cities, towns, and recreational areas outside of the Tahoe Region.			This policy was updated to formalize the need for the Region to coordinate on funding sources, expand the list of partners, and to be consistent with Area Plan policies.
	2.2 Provide frequent transit service to major summer and winter recreational areas.	4.3 Provide transit service to major summer and winter recreational areas.			This policy was modified to specify "frequent" transit service to clarify the need not only for access but frequent service to encourage increased ridership.
	2.3 Establish regional partnerships with surrounding metropolitan areas to expand transit to and from Lake Tahoe.	5.1 Participate in state and local transportation planning efforts to ensure coordination and consistency amongst various planning agencies inside and outside the Region.			This policy was updated to reflect current and future efforts to collaborate and plan with neighboring regions who's growth and transportation strategies impact the Tahoe Region.
	2.4 Improve the existing transit system for the user making it frequent, fun, and free in targeted locations. Consider and use increased frequency, preferential signal controls, priority travel lanes, expanded service areas, and extended service hours.	4.1 Improve existing transit systems through increased frequency, preferential signal controls, expanded service areas, and extended service hours.			This policy language was expanded to include the basic tenants desired for transit planning and provide flexibility for new and innovative approaches to improving the transit system.
	2.5 Integrate transit services across the Region. Develop and use unified fare payment systems, information portals, and shared transfers.				This policy was added to be consistent with Draft Corridor Connection Plan and Draft Long Range Transit Plan. This policy directs more efficient regional transit operations until free-to-the-users transit can be implemented.
	2.6 Consider waterborne transportation systems using best available technology to minimize air and water quality impacts in coordination with other modal options, as an alternative to automobile travel within the Region.	4.6 Consider waterborne transportation systems in coordination with other public and private transportation systems, including the pedestrian and bicycle network, using best available technology to minimize air and water quality impacts as an alternative to automobile travel within the Region.			This policy language was modified to clarify intermodal connectivity and public/private partnership needs when designing and implementing waterborne transportation.
	2.7 Provide specialized public transportation services for individuals with disabilities through subsidized fare programs for transit, taxi, demand response, and accessible van services.	11.1 Provide specialized public transportation services with subsidized fare programs for transit, taxi, demand response, and accessible van services.			This policy was clarified to include "individuals with disabilities" to be better reflect the type of services needed.
	2.8 Make transit and pedestrian facilities ADA-compliant and consistent with Coordinated Human Services Transportation Plans.	11.2 Ensure that transit and pedestrian facilities are ADA-compliant and consistent with the TMPO Coordinated Human Services Transportation Plan.			This policy was modified slightly to specify that the TMPO is not responsible for the Coordinated Human Services Transportation Plan, but continues to ensure consistency.
	2.9 Develop formal guidelines or standards for incorporating transit amenities in new development or redevelopment, as conditions of project approval.				This policy was added to increase transit oriented development and ensure consistency with Draft Corridor Connection Plan and Long Range Transit Plan.
	2.10 Provide public transit services at locations nearby school campuses.				This policy was added to encourage public/private partnerships, provide safe routes to schools and modified in response to comments from Placer County during TAC review to comply with California and FTA regulations.

2017/2012 RTP POLICY CROSSWALK

	2.11 Coordinate public and private transit service, where feasible, to reduce service costs and avoid service duplication.				This policy was added to encourage public/private partnerships, maximize funding opportunities, and for consistency with Area Plan policies.
Active Transportation	2.12 Develop and maintain an Active Transportation Plan as part of the regional transportation plan. Include policies, a project list of existing and proposed bicycle and pedestrian facilities, and strategies for implementation in the Active Transportation Plan.	2.1 Develop and maintain a Lake Tahoe Region Bicycle and Pedestrian Plan (Bicycle and Pedestrian Plan) as a component of the Regional Transportation Plan (RTP); and maintain a list of existing and proposed bicycle and pedestrian facilities and strategies for implementation within the Bicycle and Pedestrian Plan.			The policy was updated to reflect the new name of the Bicycle and Pedestrian Plan, now called the Active Transportation Plan. The Active Transportation Plan was updated and approved in March of 2016.
	2.13 Incorporate programs and policies of the active transportation plan into regional and local land use plans and regulatory processes.	2.6 Promote the incorporation of programs and policies of the Bicycle and Pedestrian Plan into Regional and local land use plans and regulatory processes.			This policy was revised to "incorporate" rather than "promote". The Bicycle and Pedestrian Plan is now the "Active Transportation Plan"
	2.14 Construct, upgrade, and maintain pedestrian and bicycle facilities consistent with the active transportation plan.	2.2 Construct, upgrade, and maintain pedestrian and bicycle facilities consistent with the Lake Tahoe Region Bicycle and Pedestrian Plan.	2.3 Prioritize constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed concurrently with other projects.		The Bicycle and Pedestrian Plan is now the "Active Transportation Plan". 2012 policy 2.3 was removed because this concept of prioritization in urbanized areas has been incorporated into project prioritization criteria for the ATP and RTP. Additionally, 2012 policy 2.3 was duplicative of 2016 policy 2.14.
Multi-Modal	2.15 Accommodate the needs of all categories of travelers by designing and operating roads for safe, comfortable, and efficient travel for roadway users of all ages and abilities, such as pedestrians, bicyclists, transit riders, motorists, commercial vehicles, and emergency vehicles.	10.2 Use transportation system management (TSM) measures to improve the existing transportation system, while maintaining provision of bicycle and pedestrian facilities. TSM measures could include: dedicated turn lanes, intersection improvements, bicycle-activated signals, and roundabouts. Additionally, work with State Departments of Transportation (DOT) and local transportation departments to improve signal synchronization.			This policy was updated to reflect the national complete street policy that forms the basis of the way projects should be designed, constructed, and operated throughout the Region. The updated policy is more broad and provides greater flexibility when designing projects.
	2.16 Encourage parking management programs that incentivize non-auto modes and discourage private auto-mobile use at peak times in peak locations, alleviate circulating vehicle trips associated with parking availability, and minimize parking requirements through the use of shared-parking facilities while potentially providing funding that benefits infrastructure and services for transit, pedestrians, and bicyclists.	8.1 Encourage shared and other parking management strategies.	8.2 Encourage parking management programs that provide incentives to fund improvements benefiting transit users, pedestrians, and bicyclists.	8.3 Encourage parking management strategies that are tailored to the needs of each specific location and promote pedestrian and transit use.	2012 policies 8.1, 8.2, and 8.3 addressing parking management have been consolidated in 2016 policy 2.16. Additionally, 2016 policy 2.16 is consistent with Area Plan policies.

2017/2012 RTP POLICY CROSSWALK

	2.17 Coordinate and include in area plans, where applicable, intermodal transportation facilities (“Mobility Hubs”) that serve centers and other major areas of activity while encouraging the consolidation of off-street parking within mixed-use areas.	7.1 Require that Area Plans identify intermodal transportation facilities to serve each Center, and other major activity centers. Intermodal transportation facilities should incorporate planned regional transportation facilities, parking, and connections between them (e.g., sidewalks, enclosed walkways, etc.) and should accommodate increased use of transit and non-motorized travel modes. Local agencies may need to coordinate with state Departments of Transportation when identifying intermodal facilities.			2012 policy 7.1 was modified for clarity, for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan, and to encourage the consolidation of parking consistent with Area Plan policies.
	2.18 In roadway improvements, construct, upgrade, and maintain active transportation and transit facilities along major travel routes. In constrained locations, all design options should be considered, including but not limited to restriping, roadway realignment, signalization, and purchase of right of way.	10.1 Incorporate transit stops and bicycle and pedestrian facilities in roadway improvement projects.	2.3 Prioritize constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed concurrently with other projects.		These policies were updated for consistency with the 2016 Active Transportation Plan and to reduce duplication.
	2.19 Encourage jurisdiction partners to develop and plan coordinated wayfinding signage for awareness of alternative transportation modes including transit (TART/BlueGO), pedestrian, and bicycle facilities.	2.7 Implement safety awareness signage, road markings, educational programs, and programs that encourage bicycling and walking.			This policy was updated to promote the importance of including wayfinding signage into projects to encourage use of multi-modal options, to clarify implementation is the responsibility of partner local agencies and to include transit in addition to bicycling and walking. Additionally, this 2016 policy is consistent with Area Plan policies.
SAFETY Increase safety and security for all users of Tahoe's transportation system.					
	3.1 Coordinate the collection and analysis of safety data, identify areas of concern, and propose safety-related improvements that support state and federal safety programs and performance measures.				This policy was added for consistency with Draft Corridor Connection Plan, FHWA and State planning emphasis areas, State highway safety plans, and to increase safety for all users in the Tahoe Region.
	3.2 Consider safety data and use proven safety design countermeasures for safety hotspots recommended from roadway safety audits, the active transportation plan, corridor plans, and other reliable sources when designing new or modifying existing travel corridors.				This policy was added for consistency with Draft Corridor Connection Plan, FHWA and State planning emphasis areas, State highway safety plans, and to increase safety for all users in the Tahoe Region.
	3.3 Coordinate safety awareness programs that encourage law abiding behavior by all travelers.	2.7 Implement safety awareness signage, road markings, educational programs, and programs that encourage bicycling and walking.			This policy was revised to reflect the responsibility of the TRPA/TMPO as a regional coordination agency for overall safety programming, rather than an agency responsible for implementation of signage or road markings.
	3.4 Support emergency preparedness and response planning, including the development of regional evacuation plans, and encourage appropriate agencies to use traffic incident management performance measures.				This policy was added to reflect current state and federal planning requirements, and FHWA recommended innovations through the Everyday Counts Initiative.
	3.5 Design projects to maximize visibility at vehicular, bicycle, and pedestrian conflict points. Consider increased safety signage, site distance, and other design features, as appropriate.				This policy was added to increase safety for all users as a design element to projects and encourage design flexibility where appropriate per FHWA and California Department of Transportation recommendations.
OPERATIONS AND CONGESTION MANAGEMENT		Provide an efficient transportation network through coordinated operations, system management, technology, monitoring, and targeted investments.			

2017/2012 RTP POLICY CROSSWALK

	4.0 Prioritize regional and local investments that fulfill TRPA objectives in transit, active transportation, transportation demand management, and other programs and directly support identified TRPA transportation performance outcomes.				
	4.1 Identify opportunities to implement comprehensive transportation solutions that include technology, safety, and other supporting elements when developing infrastructure projects.				This policy was added to encourage comprehensive project planning and implementation, including the Tahoe Basin Intelligent Transportation System Strategic Plan's dig once policy.
	4.2 Collaborate with jurisdictions and DOT partners to develop adaptive management strategies for peak traffic periods at Basin entry/exit routes.				This policy was added to support the regional transportation project list, area plan policies, and encourage innovation in highway corridor operations.
	4.3 Promote awareness of travel options and conditions through advertising and real-time travel information.				This policy was added to support transportation demand management programs and encourage the spread of travel by time and mode type.
	4.4 Incorporate programs and policies of the Tahoe Basin Intelligent Transportation Systems Strategic Plan into regional and local land use plans and regulatory processes.	3.2 Implement measures consistent with the Federal Intelligent Transportation Systems (ITS) Program and the Tahoe Basin ITS Strategic Plan, including Traffic Management, Traveler Information Services, and Emergency Management Techniques.			The updated policy language clarifies and supports the incorporation of policies, programs and projects of the Tahoe Basin Intelligent Transportation Systems Strategic Plan into the Regional Transportation Plan.
	4.5 Support the use of emerging technologies, such as the development and use of mobile device applications, to navigate the active transportation network and facilitate ridesharing, efficient parking, transit use, and transportation network companies.	3.1 Implement electronic and automated payment systems for transit systems and paid parking areas, where appropriate.			This policy language was modified to more broadly support the use of emerging technologies for a variety of transportation related projects.
	4.6 Level of service (LOS) criteria for the Region's highway system and signalized intersections during peak periods shall be: "C" on rural recreational/scenic roads; "D" on rural developed area roads; "D" on urban developed area roads; "D" for signalized intersections. Level of Service "E" may be acceptable during peak periods in urban areas, but not to exceed four hours per day. These vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project-generated traffic in relation to overall traffic conditions on affected roadways.	10.7 Level of service (LOS) criteria for the Region's highway system and signalized intersections during peak periods shall be: <ul style="list-style-type: none">• Level of service "C" on rural recreational/ scenic roads.• Level of service "D" on rural developed area roads.• Level of service "D" on urban developed area roads.• Level of service "D" for signalized intersections.• Level of service "E" may be acceptable during peak periods in urban areas, not to exceed four hours per day.• These vehicle LOS standards may be exceeded when provisions for multimodal amenities and/ or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project-generated traffic in relation to overall traffic conditions on affected roadways.	10.5 Consider quality of service for transit, pedestrians, and bicyclists in addition to motor vehicles when analyzing development impacts on the transportation system.		2012 policy 10.7 was not changed. Policy 10.5 was removed because it is duplicative of 2012 policy 10.7, is duplicative of existing ATP policies, and not an appropriate policy at the regional scale. Additionally, level and quality of service issues are being reviewed to reflect current state and nationwide best practices.

2017/2012 RTP POLICY CROSSWALK

	4.7 Regional transportation plan updates shall review projected travel into and within adopted area plans and effectiveness of mobility strategies.				This policy was added to ensure performance of Area Plans and inform the congestion management process.
	4.8 Prohibit the construction of roadways to freeway design standards in the Tahoe Region. Establish Tahoe specific traffic design volume for project development and analysis.	10.6 Prohibit the construction of roadways to freeway design standards in the Tahoe Region.			This policy was updated to include establishing traffic design volume standards for the Tahoe Region to support the prohibition of construction of Tahoe roadways to freeway design standards and establish a equitable and routine process during project design.
	4.9 Require the development of traffic management plans for major temporary seasonal activities, including the coordination of simultaneously occurring events.	9.2 Require the development of traffic management plans for major temporary activities that account for the coordination and timing of simultaneously occurring activities.			This policy was modified slightly to specify that major temporary activities are typically seasonal and to clarify overall policy intent.
	4.10 Actively support Transportation Management Associations (TMAs) in the Tahoe Region.	4.5 Actively support Transportation Management Associations (TMAs) in the Tahoe Region.			No change for this policy.
	4.11 Establish a uniform method of data collection for resident and visitor travel behavior.				This policy was added to coordinate with regional partners to create opportunities for trend analysis and for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan.
	4.12 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 (e.g. the Lake (www.laketahoeinfo.org) website).				Policy added for consistency current TMPO overall work program, to inform the congestion management process, and to ensure consistency with Area Plan policies.
	4.13 Establish regional and inter-regional cooperation and cost-sharing to obtain basin-wide data for transportation-related activities.				This policy was added to encourage the use and proliferation of innovative data collection methods, and for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan.
	4.14 Design roadway corridors, including driveways, intersections, and scenic turnouts, to minimize impacts to regional traffic flow, transit, and bicycle and pedestrian facilities by using shared access points where feasible.	2.4 Design and site intersections and driveways, where feasible, to minimize impacts on public transportation, adjacent roadways and intersections, and bicycle and pedestrian facilities.	10.4 Reduce traffic conflicts by limiting or controlling turning movements from multiple parking lot access points onto major Regional travel routes and major local roadways; by designing and siting driveways to minimize impacts to Regional traffic flow, and by utilizing shared access points and shared driveways where feasible.	10.3 Preserve existing view turn-outs along scenic highways to maintain traffic flow and safety.	Policies 2.4, 10.3 and 10.4 were consolidated into 2016 policy 4.11 to reduce redundancy.
ECONOMIC VITALITY AND QUALITY OF LIFE Support the economic vitality of the Tahoe Region to enable a diverse workforce, sustainable environment, and quality experience for both residents and visitors.					
	5.1 Encourage community revitalization and transit oriented development projects that comprehensively support regional and local transportation, housing, land use, environment, and other goals.	6.2 Enhance the economic vitality of the Region by efficiently connecting people to jobs, goods, services, and other communities.	6.1 Develop and track measures of economic vitality related to transportation, (i.e., traffic and pedestrian counts, employment, hotel/motel occupancies, and other visitation trends) as part of the adaptive management system.		2012 policy 6.2 was removed because the concept of economic vitality is captured throughout the regional transportation plan and broadly incorporated into 2016 policy 5.1. 2012 Policy 6.1 was removed because we now have system-level performance measures for each goal in the plan as part of the congestion management process, which also includes project-level performance measures.

2017/2012 RTP POLICY CROSSWALK

	5.2 Provide multimodal access to recreation sites. Encourage collaboration between public lands managers, departments of transportation, transit providers, and other regional partners to improve year-round access to dispersed recreation activities. Strategies could include active transportation end-of-trip facilities, transit services, parking management programs, and incentives to use multi-modal transport.				This policy was added as it is the major theme of the 2016 regional transportation plan and responds to public input.
	5.3 Collaborate with local, state, regional, federal, and private partners to develop a regional revenue source to fund Lake Tahoe transportation and water quality projects.	6.3 Support public-private partnerships and business improvement districts when planning, financing, and implementing transportation and air quality programs and projects.	13.1 Collaborate with local, state, regional, federal, and private partners to develop dedicated funding and implementation programs for Lake Tahoe and the surrounding regions.		These policies were consolidated into 2016 policies 5.3 and 5.4 to reduce duplication.
	5.4 Collaborate with regional and inter-regional partners to establish efficient transportation connections within the Trans-Sierra Region including to and from Tahoe and surrounding metropolitan areas.	5.1 Participate in state and local transportation planning efforts to ensure coordination and consistency amongst various planning agencies inside and outside the Region.	5.3 Work with appropriate public entities, tribal governments, and private interest groups to ensure coordination and consistency.		These policies were consolidated into 2016 policies 5.3 and 5.4 to reduce duplication.
SYSTEM PRESERVATION Provide for the preservation of the existing transportation system through maintenance activities that support climate resiliency, water quality, and safety.					
	6.1 Preserve the condition of sidewalks and bicycle facilities and where feasible, maintain their year-round use.	2.5 Preserve the condition of sidewalks and bicycle facilities and where feasible, maintain their year-round use.			This policy has not changed.
	6.2 Maintain and preserve pavement condition to a level that supports the safety of the traveling public and protects water quality.				This policy was added to leverage environmental improvement projects in coordination with transportation projects, per FHWA requirements for asset management, and consistency with FHWA recommendation innovations through the Everyday Counts Initiative.
	6.3 Make “dig once” the basin-wide standard, requiring public and private roadway projects to accommodate the installation of conduit to support community needs. (e.g.: fiber optic, broadband, lighting, etc.)				This policy was added for consistency with the Tahoe Basin Intelligent Transportation Systems Strategic Plan and encourage the "dig once" philosophy into all projects.
	6.4 Consider the increased vulnerability and risk to transportation infrastructure from climate stressors, such as increased precipitation, flooding, and drought when designing new infrastructure and repairing or maintaining existing infrastructure.				This policy was added for consistency with state and federal guidelines.

South Lake Tahoe U.S. 50 Coordinated Signals





Tahoe Regional Planning Agency
P.O. Box 5310
Stateline, NV 89449
Sent via email

Date: March 20, 2017
To: TRPA Governing Board, Nick Haven, Lucia Maloney, and Morgan Beryl
From: The League to Save Lake Tahoe
Re: Comments on Linking Tahoe: Regional Transportation Plan (Draft)

Dear Members of the Governing Board, Mr. Have, Ms. Maloney, and Ms. Beryl:

The League to Save Lake Tahoe (the “League”) appreciates the opportunity to provide input on the draft 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 first step towards 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. Of particular note are TRPA and the Tahoe Transportation District’s (“TTD”) plans to subsidize frequent transit, implement the “dig once” policy, improve access to recreation and trails, integrate transportation system management, and increase connectivity among travel modes.¹ Additionally, the constrained projects accurately reflect the needs and shortfalls of Tahoe’s current transportation climate and anticipate future demand. If carried out successfully, this 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 implementation. Our comments request additional information and provide the following recommendations:

- I. **Bolstering RTP policies and including additional solutions will contribute to the success of this Plan.**
 - A. The RTP should incorporate more aggressive parking management strategies similar to those included in the 2012 RTP.
 - B. Private investment in transit is essential to implementing sustainable transportation solutions.
 - C. The League supports transportation pilot projects and requests further information on the Emerald Bay Pilot Project.

¹ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Pages 3-24-29.

- D. Vacation home rentals undermine the RPU and RTP and must be regulated by the TRPA.
 - E. Clarification and information needed on transit infrastructure and roadway structures.
 - F. Additional suggestions to RTP Goals and technical corrections
- II. Effective oversight and ongoing coordination among local jurisdictions and agencies is essential to the RTP's success. Implementation of the RTP relies on information referenced in currently unavailable TTD plans.
 - A. Implementation of the RTP relies on TTD planning documents that have yet to be released.
 - B. Bay Area region should be included as part of the RTP as it is unknown if it will be incorporated into the TTD plans.
- III. Congestion Management Process is unknown, creating uncertainty to RTP implementation.
- IV. Uncertainty surrounding the status of both the VMT Threshold indicator and implementation of the RTP support an interim "no net VMT" policy.

Introduction

There are several moving parts relating to the transportation process in Lake Tahoe. The TRPA embarked on and approved a threshold evaluation late last year. TRPA is mandated to attain environmental thresholds through the Bi-State Compact (the "Compact").² TRPA reviews these thresholds and associated indicators every four years. Last year through the 2015 Threshold Evaluation (the "TVAL") process, many stakeholders (including the League) raised concerns specifically relating to the vehicle miles traveled ("VMT") indicator that is used as a metric for the air quality threshold. There have been several discussions surrounding the use of VMT as a traffic metric. Following these discussions and concerns, the TRPA convened a technical working group tasked by the Advisory Planning Commission (the "APC"). The APC has created a transportation measure task force (the "APC Task Force") that is currently looking at traffic metrics used nationwide. The APC Task Force will create a white paper to help the Governing Board and other working groups better understand what could be used as a supplement to or to expand the VMT metric.

The SB 630 Science Council is currently also working on an overall threshold indicator update process (the "Threshold Update"). Peer reviewers of the TVAL suggested that TRPA analyze the hundreds of indicators for relevancy. The VMT indicator will be part of these discussions. It is not clear at this time how the APC Task Force white paper and Threshold Update will intercept with one another, if at all. Both of these processes are currently underway.

In a meeting on February 10, 2017, TRPA staff informed League staff that the RTP would essentially be released on an accelerated schedule, and that any delay could potentially result in the withholding of federal grant monies. TRPA released the Plan in late February 2017 and informed the League that it

² Tahoe Regional Planning Compact. Pub. L. No. 96-551, 94 Stat. 3233 Art. V(g)



must be approved by April 2017 to meet federal funding deadlines. The League continues to support intelligent, collaborative transportation planning within the Lake Tahoe Basin (the “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 plans and policies referenced in the Corridor Connection Plans (the “Corridor Plans”) and the Long Range Public Transit Plan (the “LRPT”) currently being prepared by the TTD. While we support the overall concepts presented in the RTP, we are still unclear how these concepts will be implemented without first reviewing these unreleased plans. It is also unclear how the Threshold Update, APC Task Force, and RTP are connected. It is safe to assume that with an April 2017 RTP approval deadline, any findings from these important efforts to evaluate VMT and other metrics for traffic impacts will not be incorporated into this version of the RTP. 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, and we therefore reserve all of our rights accordingly. The League will offer full support next month of the finalized RTP after consideration of the below recommendations.

I. Bolstering RTP policies and including additional solutions will contribute to the success of this Plan.

We laud the measures contemplated by the RTP, but recommend that TRPA take additional actions to ensure the successful implementation of the Plan’s goals and policies. Measures that encourage the most efficient use of the Basin’s roadways and infrastructure are critical to the Plan’s success. The RTP should introduce a more aggressive parking management strategy that relies on both incentives and disincentives to influence user behavior. Similarly, the plan should include strategies that embolden the private sector to contribute capital and resources to Tahoe’s transportation system. Pilot projects are an effective method of analyzing the relative efficacy of these strategies, and we urge TRPA to devise a more comprehensive plan for such a project at Emerald Bay. Additionally, an issue of immediate concern underlying any improvements contemplated by the RTP is the current state of disrepair of the region’s roadways and storm drain infrastructure. We are also alarmed that the RTP largely ignores the substantial concerns associated with the proliferation of vacation home rentals outside of town centers. TRPA’s continued reluctance to regulate such short term rentals undermines both the RPU and this RTP. Additional information and clarification is needed on transit and roadway infrastructure. Below are specific solutions identified by the League.

A. The RTP should incorporate more aggressive parking management strategies similar to those included in the 2012 RTP.

Strategies that reduce parking demand, encourage more efficient use of existing parking facilities, and incentivize a shift to non-auto based modes of transit are integral to the ongoing success of Tahoe’s transportation system. This approach necessarily includes high return, low risk measures that have the potential to produce a substantial amount of change in the shortest amount of time. The parking management strategy proposed in this Plan is not as aggressive as previous strategies from the 2012 version of the RTP. The Trip Reduction Impact Analysis (the “TRIA”) tool is described in both the 2012 and the 2017 RTPs, but is included in more detail in the 2012 version. Specifically omitted in the 2017



version is the assumed reduction in minimum parking requirements across the Basin. The 2012 RTP stated that 60 percent reduction in minimum parking requirements was expected (TRPA staff later clarified that their intention was to bring about a 40 percent reduction in minimum parking requirements), but this reduction is not quantified in this Plan. This RTP should be revised to incorporate the projected reduction in minimum parking requirements in accordance with the 2012 RTP and associated TRIA tool.

In the interest of brevity, we suggest adopting two parking management strategies in the short term: eliminating minimum parking requirements and enforcing maximum parking requirements, and implementing dynamic pricing, particularly in Town Centers and at recreation sites.

1. The RTP should eliminate minimum parking requirements and impose maximum parking requirements.

To incentivize visitors and commuters to rely on the subsidized transit program detailed in the RTP, TRPA should enforce measures that more efficiently manage existing parking and discourage additional parking. Placer County recently recognized the importance of this strategy, confirming that “[i]t is in the public interest to minimize parking wherever possible to . . . encourage non-auto transit modes.”³ Eliminating minimum parking requirements for all developments and enforcing maximum limits on parking are effective methods of accomplishing this important objective.

TRPA should rescind all minimum parking requirements for both existing and new land use projects in the Basin. The RTP incorporates policy that recognizes the need to minimize parking.⁴ However it does not go far enough in detailing aggressive strategies to achieve that goal. Although the RTP omits any discussion of the relationship between parking and VMT, imposing a minimum parking requirement may generate increased VMT and exacerbate traffic congestion. Eliminating parking minimums would enable owners of existing and new private parking lots to open their lots to the public as paid parking at market prices, therefore encouraging the most efficient use of existing parking. Local jurisdictions could implement this policy immediately and at no cost to local jurisdictions. Additionally, TRPA could establish parking maximums and enforce an upper limit on the parking supply for new developments.

2. The RTP should implement dynamic, demand-based parking pricing.

Dynamic parking pricing responds to increased demand by adjusting parking rates in real time, ostensibly encouraging drivers to avoid congested areas during peak times. The RTP addresses this policy to a certain extent in Policy 4.5 which promotes the “use of emerging technologies, such as the development and use of mobile device applications . . . to facilitate ridesharing [and] efficient parking . . .”⁵ Similarly, Policy 2.16 encourages “parking management programs that incentivize non-auto modes and discourage

³ North Tahoe Parking Study. March 19, 2005. Prepared for Placer County by LSC Transportation consultants. Page 57.

⁴ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Policy 2.16. Appendix A. Page A-3.

⁵ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Policy 4.5. Appendix A. Page A-4.



private auto-mobile [sic] use at peak times in peak locations.”⁶ TRPA must go further than promoting and/or encouraging these programs by mandating them and providing definitive plans for their implementation and ongoing operations.

B. Private investment in transit is essential to implementing sustainable transportation solutions.

As a pragmatic, solutions based organization, the League recognizes that TRPA inherently lacks the resources to single-handedly solve all of the transit and congestion problems facing the greater Tahoe region. Incentivizing private investment to boost existing transportation networks will be an integral part of realizing the larger connected vision contemplated by the RTP.

TRPA appears to embrace this strategy, to some degree, in its Employer-Based Trip Reduction Program (the “Trip Reduction Program”) that is detailed specifically in TRPA’s Code of Ordinances (the “Code”). The Trip Reduction Program mandates the implementation of certain transportation control measures and reporting requirements for large employers in the Basin.⁷ The Trip Reduction Program holds innovative transit solutions that has been provided in Appendix A for the Governing Board members to see and use as part of their TRPA public hearing discussion, details a number of innovative transit solutions. The League ardently supports the Trip Reduction Program as an effective measure to induce substantial private sector contributions to transportation solutions, and we encourage TRPA to enforce its requirements and carry out the compliance monitoring audits.⁸ The League also encourages that some combination of these measures be used by *all* employers (not just larger employers) regionally.

Some private companies are already taking steps to implement transportation control measures and make material capital investments in existing transportation infrastructure rather than contributing in lieu fees. For example, the recently approved Tahoe City Lodge project incorporates bicycle incentives and provides transit pass subsidies to its employees. Squaw Valley recently completed a pilot program featuring Chariot, a free app-based micro-mass transit system that offered fixed route and on demand services to users traveling to the ski resort and throughout the north Tahoe region. Encouraging the ongoing infusion of private capital into transit and transportation infrastructure will be critical to the long term success of the RTP and the greater transportation vision for the Basin articulated by TRPA and TTD.

C. The League supports transportation pilot projects and requests further information on the Emerald Bay Pilot Project.

The League supports transportation pilot initiatives designed to engage agencies and local jurisdictions to participate in innovative, collaborative efforts to improve circulation and relieve congestion in the Basin. In a meeting with League staff on February 10, 2017, TRPA staff introduced one such potential pilot

⁶ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Policy 2.16. Appendix A. Page A-3.

⁷ See TRPA Code of Ordinances § 65.5 (2013).

⁸ See TRPA Code of Ordinances § 65.5 (2013).

project proposed for Emerald Bay (the “Emerald Bay Project”), describing it as an opportunity to showcase the integrated transportation strategies detailed in the RTP. However, the Emerald Bay Project is presented in the RTP as only a broad list of possibilities for traffic management, omitting any objectives, timelines, or specific plans. Moreover, the Emerald Bay Project does not appear on the Plan’s list of constrained projects.⁹ A review of the information provided on TRPA’s online EIP Tracker yielded similar information.¹⁰ The Emerald Bay Project is unfunded, includes no estimated budget or performance measures, and is not slated to begin until 2021-- outside of the four-year planning horizon of the RTP.

We wholeheartedly agree with TRPA’s acknowledgment that bundling projects for implementation in common corridors is an effective strategy, and we support the Emerald Bay Project as it was presented to us on February 10. The Emerald Bay Project seems to be one of the most promising pilot projects to achieve this goal and should be implemented within the next four years. Moreover, the League hopes to be able to use this pilot project as a tool to lobby for federal funding and a model for future projects. Accordingly, we request more information on TRPA’s plans to finance and carry out this project over the next four years. If such information does not exist, we urge TRPA to more aggressively pursue implementation of a near term pilot project within the scope of this Plan that is funded, includes specific objectives, and stipulates definitive plans. If the RTP is not an appropriate venue for these details they should be incorporated to the LRPT or other transportation planning documents.

D. Vacation home rentals undermine the RPU and RTP and must be regulated by the TRPA.

It is TRPA’s mandate to ensure that RPU goals are met. The RPU specifies a clear system of land use and zoning regulations carefully designed to concentrate development in Town Centers. The rising popularity of resource sharing applications like Airbnb, coupled with Tahoe’s booming tourist economy, has induced the unprecedented expansion of vacation and short-term rentals that undermine and prohibit achievement of this objective. Developers are converting residential properties into small scale hotels, redirecting development away from Town Centers in direct contravention to the RPU. The large influx of tourists in residential neighborhoods has created a litany of traffic and congestion problems not contemplated by the RPU and antithetical to the land use restrictions contained therein. The RTP is tiered off of the RPU and largely depends on the ongoing monitoring and enforcement of its underlying land use policies in order to be effective. The continued proliferation of short-term vacation rentals, if left unregulated, will substantially undermine the goals and the implementation of the RTP. Accordingly, we urge TRPA to enforce the land use policies mandated by the regional plan and regulate short-term vacation rentals. Specifically, we recommend that this be addressed by revising Policy 1.6 to read (additions in italics):

“Require new and encourage existing major commercial interests providing gaming, recreational activities, excursion services, condominiums, timeshares, hotels, motels, and *all overnight uses* to participate in transportation demand

⁹ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 1-19.

¹⁰ <https://eip.laketahoeinfo.org/Project/Summary/01.01.03.0036>

programs and projects.” It is imperative these uses not be ignored for successful implementation of this Plan.”

E. Clarification and information needed on transit infrastructure and roadway structures.

We had our expert Mr. Greg Riessen, P.E & Principal at *Treduction* review the RTP. He provided the League with recommendations and clarification which are summarized here. The below comments seek clarification on the finalized RTP and that it provide information on specific transit infrastructure and roadway structures so that implementation of its strategies are successful. Mr. Riessen makes the below recommendation (1.) and request for clarification (2. and 3.)

1. *Transit infrastructure should prioritize transit lanes before or alongside transit signal priority. There should also be clarification on regional signal timing.*

The RTP describes projects to prioritize transit, including Transit Signal Priority (the “TSP”) in the near term and transit-only lanes in the long term, as described: “Transit signal priority which allows buses to start moving before cars at signalized intersections is on the constrained list and is a first step. Adaptive management strategies that hold cars to let buses pass or provide transit only lanes will occur later with additional project funding and partner consultation.”¹¹

While implementing TSP may be easier and faster than implementing transit-only lanes, the benefits provided by TSP will be marginal in the absence of transit-only lanes. This is because the ability for the traffic signal to successfully and meaningfully grant priority to a bus in a mixed-flow lane is inhibited due to the presence of cars traveling ahead of the bus in the travel lane. Mixed-flow lanes result in uncertain transit travel times, precluding the ability of the traffic signal to accurately predict the bus’s arrival and successfully grant priority access.

In fact, TSP signals without transit lanes can frequently result in *additional* delay to transit (compared to having no priority treatment at all), because the signal will extend and/or truncate phases in an effort to prioritize a bus that is stuck in congestion; the erratic signal phases will exacerbate congestion for all vehicles, including the bus. Moreover, other TSP features such as allowing the bus to start moving before cars is physically not possible unless the bus is traveling in an exclusive lane. Lastly, given the lack of traffic signals in the Tahoe Basin, TSP treatments will be of limited implication; the only corridor with a series of traffic signals where TSP would provide a meaningful benefit is along US 50 in South Lake Tahoe. On the other hand, long vehicle queues are present along multiple Tahoe corridors; implementing transit-only lanes would be meaningful and beneficial across many Tahoe communities.

Instead of focusing on TSP now and transit lanes later, the RTP should be revised to focus on both TSP and transit-only lanes as a package project. Along corridors where there is not sufficient width for striping

¹¹ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 3-12.

of transit lanes, traffic metering strategies upstream of the pinch point (where width for transit lanes is present) should be developed.

To simplify this further, the TSP at a traffic signal works by:

- a. The signal controller detects an approaching bus using a GPS and radio technology such as *Opticom*. The controller has been programmed with the estimated bus travel time from the point of bus detection (i.e. 30 seconds upstream of the signal).
- b. Upon detection of the bus, the traffic signal controller decides either to "go long" and hold a green for the approaching bus, or, if the bus will arrive too late (or the bus signal is already red), the signal will decide to "go short" and minimize the duration of the red by truncating the conflicting phases.

This system can work with buses traveling in a mixed-flow lane (i.e. no transit-only lane) only if there is a low traffic volume, such that the other cars in the lane do not cause any delay to the bus. In other words, this works overnight from ~8pm to ~6am when traffic volumes are low; but of course during those times at night, the traffic signal likely rests on green for the main road where the bus is traveling, so there is not much traffic signal delay reduction to be achieved at night anyway.

Signal delay along the main road is more pronounced during peak periods, due to higher traffic volumes. However, when there is any substantial volume of cars in the road in front of the bus, there will be at least several seconds of delay to the bus (compared to "free flow" conditions) that will render the programmed travel time of the bus incorrect; this causes the signal to perform the wrong action, creating more delay for the bus. Typically, this manifests in the following way: the signal will "go long" and hold the green for the bus, but the bus is slightly delayed by traffic, and before the bus gets through the intersection, the green extension will hit its maximum duration (because the signal must be programmed to not rest on green forever, there is a maximum timer), and the bus will then arrive on a fresh red light. Then the bus will have to sit through that red light before being served the green on the next cycle; however the next cycle's green will occur at a later point in time compared to normal (non-TSP) operation, because the previous green phase was (erroneously) extended. Also, the signal will be taken out of coordination with adjacent signals, resulting in a decrease in overall capacity and added delay for the bus. So this means that the bus will actually experience more delay than if there was no TSP at all, especially during the most congested conditions.

The League welcomes the opportunity to discuss this concept further with TRPA staff. Again, if these specific recommendations cannot be included to the finalized RTP they should be considered in other venues. The League also requests information stated in the RTP on signal coordination. On Table 3.4 titled Technology Infrastructure: Existing, Constrained List, and Unconstrained List, the RTP cites under existing conditions that there is signal coordination in certain areas of the South Shore.¹² From multiple conversations with both TTD and TRPA staff, the League has heard this is not in fact the case and that this is a Caltrans issue. That Caltrans is the agency that has power for this coordination. Information on

¹² Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 3-30.



how this is implemented should be included in the finalized RTP to help achieve regional signal coordination.

2. Clarification is needed on currently approved and soon-to-be reviewed roadway projects as they will actually increase capacity for private automobile use (and likely VMT).

Roadway projects will likely increase capacity for private automobile use. There are several references in the RTP describing how the region's roadway network has "no capacity expansion plans."¹³ However, this is not true. In both Tahoe City and South Lake Tahoe, traffic bypasses are either under construction or being considered for development. Traffic bypasses are, in fact, capacity expansion projects because they eliminate capacity-reducing bottlenecks. The RTP should explain that existing roadways are not being considered for widening, but new roadway traffic bypasses are being pursued to increase capacity through traffic chokepoints.

3. Additional information is needed on Lake Tahoe specific traffic design volume.

The RTP Policy 4.8 is written: "Prohibit the construction of roadways to freeway design standards in the Tahoe Region. Establish Tahoe specific traffic design volume for project development and analysis."¹⁴ Prohibiting freeway design standards is a good policy, continued from the previous RTP. What does "Tahoe specific traffic design volume" refer to, how will it be established, and by whom? The RTP should be revised to elaborate on this policy.

F. Additional suggestions to RTP Goals and technical corrections.

This specific section details additional recommendations and need for clarification on other portions of the RTP. Mr. Riessen and League staff noted the Table 2.4 in the RTP named 2016 RTP/SCS Mobile-Source Greenhouse Gas Emissions for California Portion of the Basin demonstrates that not only VMT targets but greenhouse gas emissions (or "GHG") are weakened from 2020 to 2035.¹⁵ While the table concludes SB 375 targets are being met, there is no clarification as to why the emissions are actually increasing both by tons per day and per capita. It can be assumed this is because of Basin buildout through the RPU and because of visitorship. However, clarification on this matter should be addressed in either the finalized RTP or Threshold Update. Both climate change issues and increase of tourist visitation are increasingly growing regional problems that must be constantly included in transportation

¹³ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 3-36.

¹⁴ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Policy 4.8. Appendix A. Page A-4.

¹⁵ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 2-17.



and air quality discussions. Not only does this table raise these concerns, but directly conflicts with RTP's first goal to reduce GHG.

Next, Lake Tahoe's roads and storm drains are not consistently maintained on a regional level. A simple drive around any of Tahoe's main thoroughfares demonstrates infrastructure shortfalls. This is a significant problem tied to transportation that has a direct negative impact on Lake clarity. During the winter months, the League conducts a citizen science stormwater monitoring program ("Pipekeepers") that oversees certain drainage pipes around the Lake. Pipekeepers can be used as a tool to identify where sediment and runoff from certain areas are a problem and raise awareness in the local community about what can be done to mitigate those problems. The RTP generalizes that stormwater drains are maintained, which contributes to environmental improvement. We encourage that the RTP prioritize stormwater drain and road maintenance and discuss how it will be implemented.

Finally, the League had previously recommended to TRPA staff that "restore" be added to Goal 1 inserted as *italicized* here: "Protect, *restore* and enhance the environment, promote energy conservation, and reduce greenhouse gas emissions." This addition would better link the RTP to goals of the RPU. We had also recommended that "sustainable" be added to Goal 4 inserted as *italicized* here: "Provide an efficient and *sustainable* transportation network through coordinated operations, system management, technology, and monitoring." We believe the transportation network should be physically and financially sustainable. It appears from this DRAFT Plan that our recommendations were not accepted. Please provide a justification for not including these recommendations. Lastly, Appendix B on page B-7 the Table should read "unconstrained" not "constrained."

II. Effective oversight and ongoing coordination among local jurisdictions and agencies is essential to the RTP's success. Implementation of the RTP relies on information referenced in currently unavailable TTD plans.

The success of this RTP is highly dependent on TRPA's close coordination with local jurisdictions and agency partners, particularly the TTD. The RTP is the foundation and guide for local jurisdictions' Area Plans. The RTP must provide aggressive strategy and include suggestions provided within these comments. Local jurisdictions will rely on the RTP progressive strategies to have the confidence to move forward in their own progressive policy creation.

While the League is encouraged by information in the RTP and discussions with TRPA staff confirming an ongoing collaborative relationship between TRPA and TTD, the RTP itself provides very little detail on the nature, extent, and scope of such relationship. Specifically, the RTP omits any discussion of how funding will be allocated between TRPA and TTD, restrictions or conditions attached to any monies obtained through the "self help" funding strategies discussed in the Plan, or any strategies to jointly increase accountability and transparency among the organizations. Similarly, the Plan fails to outline how TRPA and TTD will collaborate effectively with Caltrans and NDOT, the state agencies responsible for highway transportation planning, construction, and maintenance in California and Nevada, respectively. There must be a clear understanding of how all of these agencies will work together so that implementation of this Plan and identification of sustainable funding mechanisms are both successful.

A. Implementation of the RTP relies on TTD planning documents that have yet to be released.



As an advocacy organization, the League is committed to supporting a clear, pragmatic transportation vision and working to secure funding to support that initiative. In this case, implementation of this plan relies heavily on TTD's Corridor Plans and LRPT, both slated to be released this spring. For example, the Plan promises that "[m]ore detailed challenges, opportunities, and solutions" will ultimately be outlined in the upcoming Corridor Connection Plan.¹⁶ As TTD has not publicly released any of these documents, we cannot accurately appraise or comment on the entirety of the transportation vision contemplated by TRPA. As complete implementation of the RTP cannot be understood we advocate adoption of an interim "no net VMT" policy discussed further in these comments.

B. Bay Area region should be included as part of the RTP as it is unknown if it will be incorporated into the TTD plans.

The RTP long-term regional transit projects omit the Bay Area travel market. The Bay Area to Lake Tahoe regional transit need is not addressed in the Plan at all. This is despite the public repeating the desire for an effective Bay to Basin transit service.¹⁷ The RTP does not even mention the need for effective regional transit from the San Francisco Bay Area. The Plan does include long-term projects to enhance regional transit to Reno and Sacramento. While better transit to Reno and to Sacramento is a good idea, the largest travel market is between the Bay Area and Tahoe, resulting in the highest potential to reduce VMT and traffic congestion. The RTP should include Bay Area to Lake Tahoe regional transit as a top priority as again it is unknown at this time what will be included in the TTD documents.

III. Congestion Management Process is unknown creating uncertainty to RTP implementation.

The Lake Tahoe region was recently redesignated as an "urban" area which qualifies the TRPA to be eligible for more federal funding opportunities. Technically the TRPA acts as the Tahoe Metropolitan Planning Organization (the "TMPO") when approving and assessing federal transportation requirements. The redesignation requires the TMPO to develop, establish, and implement a congestion management process (or "CMP") that includes coordination with transportation system management and operations activities.¹⁸ The CMP is a stakeholder working group eight-step process that will rely on RTP for guidance. While the CMP does not have an update cycle established by federal regulations, the U.S. Department of Transportation Federal Highway Administration's *Congestion Management Process Guidebook* states,

"Both the four-year certification review and update cycle for [the regional] transportation plan for each [TMPO] provide a baseline for a revaluation/update cycle in the absence of an identified requirement. The CMP must, at a minimum, be updated often enough to provide relevant, recent information as an input to each [regional] transportation plan update. In order to establish a routine CMP review, many MPOs have chosen to link CMP updates to either the [regional] transportation plan or transportation improvement program development cycle. The CMP may also operate on an independent update

¹⁶ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 1-20.

¹⁷ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Appendix C. Figure C.2.

¹⁸ Title 23 § 450.320 (a) Congestion Management Process in transportation management areas.

schedule and provide input to both the [regional] transportation plan or transportation improvement program.”¹⁹

As the CMP is a new requirement for the TMPO it can be assumed this RTP will inform the CMP process. However, it is clear from the above language both the RTP and CMP will rely on each other through update cycles. The RTP has a specific policy stating a CMP will be developed and implemented.²⁰ It also states that TRPA is in the process of establishing and implementing the CMP and describes how the two will be integrated through evaluation and prioritization of transportation projects and strategies.²¹ As with the TTD plans, the CMP information has not been released to the public, likely because it has not yet been established. The CMP will be a critical and valuable resource for the Basin. It is not clear how the RTP strategies will be implemented through the TTD plans and CMP. Again our organization supports the overarching purpose and strategy of the RTP, but its implementation uncertainty is something that must be continued to be addressed following its approval. For the same reasons as the Corridor and Transit plans, our organization reserves the right to provide comments and information for the CMP. We are hopeful that all of these future plans and processes will aid in successful implementation of the RTP.

IV. Uncertainty surrounding the status of both the VMT Threshold indicator and implementation of the RTP support an interim “no net VMT” policy.

As already detailed in these comments, there are several moving pieces to the Lake Tahoe transportation puzzle. The RTP, TTD plans, CMP, APC task force, and Threshold Update are all seemingly happening concurrently on parallel paths, but how they will all intersect is yet to be made clear. All of these cited plans and processes will take years to coordinate and implement. While our organization supports the overall concepts and understands the strict adoption deadline for the RTP to meet federal funding requirements, our concerns remain on how to resolve traffic problems immediately or in the very near future. The League offers, again, the interim “no net VMT” policy as a reasonable solution.

The status and use of the VMT Threshold Indicator is currently being assessed in different arenas. The League has submitted previous comments on TRPA’s 2015 Threshold Update, Placer County’s Area Plan, and two development projects (both in Placer County: Squaw Valley and Martis West) that the VMT threshold status does not accurately reflect current conditions on the road as they omit these development projects and are using old traffic count data. Through conversations with TRPA staff, the League understands that the RTP environmental analysis was based on the same 2015 Threshold Update data because the information leading up to 2015 (so through 2014) was the only information available when analyzing that update. We understand that the RTP and associated environmental

¹⁹ Congestion Management Process: A Guidebook. April 2011. U.S. Department of Transportation Federal Highway Administration. FHWA-HEP-11-011. Page 6.

²⁰ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Policy 1.9. Appendix A. Page A-1.

²¹ Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 5-5 (Inset).



analysis had to rely on that information as the update process has spanned over a year. However, 2015 VMT information is provided in Appendix D of the RTP and both development projects include VMT impacts in their 2016 approved environmental reviews. The most current information must be used for all future plans and stakeholder working groups, as detailed in these documents.

Again, the League concern remains that the current traffic impact situation at Lake Tahoe is far worse than what has been analyzed. We need more information about how actual conditions relation to the VMT indicator, and implications that would have for future project approvals. The RTP itself cites,

“The most recent regional threshold evaluation reports recommended that the link between the VMT standard and desired conditions should be assessed to ensure that regional daily VMT is still the most appropriate air quality measure. This plan takes that recommendation one step further, by recommending that the assessment include consideration of using a VMT standard as a regional transportation planning performance measure beyond the air quality purposes currently in place, and consider whether an alternate measure should be considered as the threshold standard for air quality.”²²

The uncertainty surrounding the status of the VMT indicator and how it should be used support the immediate need of an interim “no net VMT policy.” It is critical that TRPA adopt interim measures so that Lake Tahoe redevelopment ensures no net VMT increase. The League recognizes the importance of redevelopment and encouraging economic vitality within the region. Considering the uncertainties raised within these comments we suggest that TRPA only approve new development projects that are successfully demonstrate no associated increase in VMTs, through mitigation or otherwise (i.e. VMT neutral). This interim policy would be consistent with TRPA’s own Code that cites,

“Two years after each release, TRPA shall monitor existing near-term LOS to evaluate compliance with applicable LOS policies. Should LOS projections indicate that applicable LOS policies will not be met, TRPA shall action to maintain compliance with LOS standards. TRPA shall also monitor VMT and only release commodity allocations upon demonstrating, through modeling and the use of actual traffic counts, that the VMT Threshold Standard shall be maintained over the subsequent four-year period.”²³

As stated in our oral comments provided at TRPA’s APC March 8, 2017 hearing on the RTP, this does not mean a moratorium on all development. This would mean that TRPA only approve projects that either do not increase VMT or properly mitigate increase VMT through innovative transit solutions (i.e. what is detailed in the Employer Trip Reduction code, are within Town Centers and incorporate transit stops coordinated with the TTD, affordable housing projects outside of Town Centers provide shuttles or again coordinate public transit stops, etc.). Project proponents must be part of the Basin’s transportation solutions.

²² Draft Linking Tahoe Regional Transportation Plan. February 2017. Tahoe Regional Planning Agency. Page 5-9.

²³ See TRPA Code of Ordinances § 65.5 (2013).



Recommendations

The League recommends that suggestions detailed in these comments be incorporated to the finalized RTP and that additional information be provided on points of clarification. To summarize:

- **The RTP will be the roadmap for Area Plans and other planning documents. It must include more aggressive management strategies similar to those included in the 2012 RTP. This includes eliminating parking minimums and implementing parking maximums.**
- **Private investment in transit is essential to implementing sustainable transportation solutions. The Employer Reduction Program offers suggestions to innovative solutions.**
- **The League supports transportation pilot projects and requests further information on the Emerald Bay Pilot project. If funding needs are unknown at this time, these must be included in other planning documents (i.e. Corridor Plan).**
- **Vacation rentals undermine the RPU and RTP and must be regulated by the TRPA.**
- **Clarification is needed on transit infrastructure and roadway structures. Specifically, transit lanes should be prioritized. If they are not in prioritized in the RTP they should be in other planning documents. Clarification is needed on future roadway projects as they will actually increase VMT. Additional information is needed on traffic design volume for the region.**
- **Clarification is needed as to why GHG emissions will actually increase when the RTP's goal is to decrease these.**
- **RTP should prioritize the encouragement of stormwater maintenance.**
- **RTP should detail how there will be coordination between TRPA, TTD, local jurisdictions, Caltrans, and NDOT on implementation of it and other future planning documents.**
- **The Bay Area region should be included as part of the RTP as it is unknown if it will be incorporated into TTD Plans.**
- **TRPA should adopt an interim "no net VMT" policy as uncertainty surrounds both the VMT Threshold indicator and implementation of the RTP.**

Sincerely,

Shannon Eckmeyer, Esq.
Policy Analyst
League to Save Lake Tahoe

Marissa Fox, Esq.
Policy Associate
League to Save Lake Tahoe

Attachment: Appendix A: TRPA Code 65.5 Employer-Based Trip Reduction Program



From: Lindell Price <LindellPrice@gmail.com>

1. Page 3-17 or 86 Existing Trails Network. Total miles of active transportation facilities is a poor metric compared with metrics that demonstrate the amount of use, utility, quality, and connectivity provided by these active transportation facilities, especially where use of these facilities can be shown to substitute for motor vehicle trips.

Thank you for this recommendation. Our current metrics for connectivity are Miles of bicycle and pedestrian facilities constructed and non-auto mode share. That being said, we are currently looking at the measures we use to ensure we are using the best measures to illustrate success in meeting our goals. I will pass your recommendation to our measures working group project lead.

2. Page 3-18 or p. 87, "Jaywalk" is a pejorative word directed at pedestrians, that is not in California law; it does not belong in any formal government document. Use of the word "Jaywalk" demonstrates hostility toward pedestrians, and discourages walking.

Thank you for this recommendation. I've updated the text to read: "Locations in City of South Lake Tahoe, Tahoma, Meyers, and Douglas County lack crosswalk opportunities, encouraging people to cross in areas without crosswalks and bike in the wrong direction."

3. A distinction is needed between recreational trails, and utilitarian active transportation facilities, such as walkways, sidewalks, and bikeways that are designed, maintained and managed to provide safe, reliable year-round, 24-hour, all-weather transportation equivalent to the corresponding roads. Recreational trails are frequently seasonal, fair-weather, or daylight facilities that are not designed, maintained or patrolled to provide 24-hour, year-round, safe, secure utilitarian transportation. This distinction is especially important for disabled, elderly or low-income people who may not be able to drive themselves to meet their transportation needs.

Thank you for this comment. We go into much more depth on the difference between users and facility types in the 2016 Active Transportation Plan. You can find that plan here:

http://tahoempo.org/ActiveTransportationPlan/docs/ATP_Final_Appendix%20A%20&%20H.pdf

4. Entire Plan: The word "trail" is misused throughout this plan by applying it to utilitarian active transportation facilities. Note per the California Highway Design Manual, "Trails are generally, unpaved multipurpose facilities suitable for recreational use by hikers, pedestrians, equestrians, and off-road bicyclists. While many Class I facilities are named as trails (e.g. Iron Horse Regional Trail, San Gabriel River Trail), trails as defined here do not meet Class I bikeways standards and should not be signed as bicycle paths." Change the wording throughout this plan, so that utilitarian active transportation facilities are not conflated with "trails".

We appreciate the difference between a trail, shared-use path, bike lane, bike route, etc. Again, we go into much more depth on these differences in the 2016 Active Transportation Plan. We are using the term "Trails" here as an overarching term to mean all active transportation facilities.

5. Page 3-15 or 84. Under "Designing for all users of the transportation system means:"

"Optimizing signalized intersections so bicyclists are detected and have a leading head start before cars begin to move" is good; a similar statement is needed regarding a leading pedestrian interval.

Thank you for this recommendation. I've added "and pedestrians" to this bullet.

"Appropriately distancing crosswalk opportunities so people can access their neighborhoods, commercial centers, and jobs without having to jay walk" Good concept; rephrase without the pejorative "jay walk".

Thank you for this recommendation. I've updated to read: "to cross without appropriate infrastructure"

"Adhering to ADA requirements so wheelchair users, visually disabled and the hearing impaired can get to their destinations safely." is also excellent. ADA compliant facilities need to be distinguished from recreational trails, to inform design, maintenance, and users of the facilities. Criteria also exist for accessibility of recreational trails. Potential trail users need access to information on trail characteristics.

Thank you, comment noted.

6. Page 5-13 to 5-14 or 128-129. For metrics, include all pedestrian and bicyclist serious injuries and fatalities that occur on facilities included in this plan, i.e., on off-road facilities such as Class I Bikeways, shared use paths, and for recreational trails that are included in this transportation plan.

At this time, we are unable to accurately measure injuries on facilities other than roadways because they often go unreported. Even on roadway injuries are under-reported. Through the Lake Tahoe Region Safety Plan, a project which will commence in the Summer of 2017, we will be taking a hard look at how to collect and analyze injury data more comprehensively.

7. Describe pedestrian and bicycling facilities rather than stereotyping the users of these facilities.

Please see the 2016 Active Transportation Plan for in depth descriptions of users and facilities.

Thank you, Loren for your comment on the Active Transportation Plan and the draft 2017 Regional Transportation Plan.

For clarification, the reference you make to page 2-7 in the Active Transportation Plan is noting what *would* make a strong multi-modal system – essentially offering guidance for Tahoe transit operators on how they can improve their services to be more multi-modal.

Federal and state laws prohibit more than 2 or 3 bike racks on buses depending on the size of the bus. However, that does not mean there are no other solutions, as you suggest. I know that TTD has been working on possibly using bike trailers. It's helpful to know which routes you think it would be best utilized on. I've cc'd George Fink so he sees your ideas and can follow up with you on how TTD intends to increase bicycle carry capacity on their buses. My understanding is TTD is already looking at the possibility of Bike trailers for Route 23.

Thanks again for your comments,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Loren Jolley [<mailto:lorenjolley@gmail.com>]
Sent: Friday, March 24, 2017 9:06 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Bicycles on Tahoe buses

To whom it may concern:

I am an avid outdoors-man (cyclist, skier, climber, hiker) who visits Tahoe frequently. The current Active Transportation Plan contains many great improvements for cyclists, including bike paths and lanes on many dangerous and much-needed stretches of road, and I support those improvements! I would like to call attention to one important improvement on page 2-7 of the Active Transportation Plan: "Buses have sufficient bicycle carrying capacity."

Currently, Tahoe buses carry either two or three bicycles on a front-mounted rack, which means somewhere between two bicycles per hour (on the 23 bus) and six bicycles per hour (on the 50 bus). This is insufficient, and it makes the bus useless as multimodal transport, since it's very likely that the racks are already full and I will be denied boarding. As a cyclist, I, and my many colleagues, would like to use the 23 bus to access the Tahoe Rim Trail without running a car shuttle. I would love to be able to park my car once I arrive, and use a combination of bicycles and city buses to recreate.

I visit Park City, UT often as well and they have this worked out very well and it really works out well for the community there. *I strongly encourage you to make greater bicycle capacity on TTD buses - specifically the 23 and 50 buses - a major priority.* I am told that bike rack trailers are the most realistic way to do this - but I support whatever increases bicycle capacity to the point that I can depend on no longer being denied boarding because the two rack spaces are already full.

Thank you,

Loren Jolley

Morgan:

Thank you for your assistance in forwarding the materials prepared by the Meeks Bay Vista Property Owners Association ("MBVPOA") on to the agencies you have listed below.

On behalf MBVPOA, Antony "Tony" Evans and I remain fully ready to assist any planners or agencies as they consider the Tahoe Transportation System and any future route for a Bike Path south of the Meeks Bay Resort.

I see on the TRPA website that **public comment on the 2017 Draft of the Linking Tahoe, Regional Transportation Plan closes on March 24, 2017.**



Draft Regional Transportation Plan Released

PUBLIC COMMENT PERIOD THROUGH MARCH 24

Interested in Tahoe transportation? Visit the link below to see how the Tahoe Region is planning for transit, trails, and technology. Please submit comments on the draft Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy online or send to:

Morgan Beryl, mberyl@trpa.org or 775-589-5208

www.trpa.org/regionaltransportationplan

On behalf of MBVPOA, Tony Evans and I would appreciate if you would add the materials I previously forwarded to the public comment on the new Draft Linking Tahoe, Regional Transportation Plan.

I have attached copies of my March 9, 2017 email (and the 2 documents attached to that email) to make it easier for you to add these three documents to the public comment on this Draft Plan.

Thank you again for all of your assistance.

Bill

William A. S. Magrath II | Partner

McDONALD  **CARANO**

P: 775.788.2000 | E: wmagrath@mcdonaldcarano.com

From: Morgan Beryl [<mailto:mberyl@trpa.org>]

Sent: Monday, March 13, 2017 10:25 AM

To: William A. S. Magrath II; Antony C Evans

Cc: davecoward@aol.com; jowens@boisestate.edu; npike@npike.com; dickrenard@gmail.com; lee@schweichler.com; ronaldstephens@schoolsafety.us; taregger@earthlink.net; mldarpino@gmail.com;

mapes ranch; suzy lyons; Anjanette Hoefer; Tamara Sasaki (tsasaki@parks.ca.gov);

donaldo.palaroan@edcgov.us; john.kahling@edcgov.us; Chris Mertens; Teresa Limon

(teresa.limon@dot.ca.gov); arthur.murray@dot.ca.gov; 'rnygaard@tahoetransportation.org'; Carl Hasty

Subject: RE: Meeks Bay Vista Property Owners' Association - Proposed Bike Route - Confirmation of Ownership of Properties Adjacent to Proposed Bike Route.

William et al:

Thank you very much for this informative work. This type of information really helps get projects off the ground! I have cc'd the relevant agencies that would need this information in order to begin thinking about a proposed project in this vicinity. I will also save the information in my files as a reminder as planning for improvements in this project area come online. If there is interest in looking more deeply into this project at this time or in the future by any of the appropriate agencies, I am happy to help coordinate a meeting.

Cc'd

State Parks: Tamara Sasaki

Caltrans: Teresa Limon

CTC: Chris Mertens

USFS: Anjanette Hoefer

El Dorado County: Donaldo Palaroan and John Kahling

TTD: Carl Hasty and Russ Nygaard

Best,

Morgan Beryl

Senior Transportation Planner

775-589-5208

mberyl@trpa.org



From: William A. S. Magrath II [<mailto:wmagrath@Mcdonaldcarano.com>]
Sent: Thursday, March 09, 2017 4:50 PM
To: Morgan Beryl <mberyl@trpa.org>; Antony C Evans <tevans@rancho.net>
Cc: davecoward@aol.com; jowens@boisestate.edu; npike@npike.com; dickrenard@gmail.com; lee@schweichler.com; ronaldstephens@schoolsafety.us; William A. S. Magrath II <wmagrath@Mcdonaldcarano.com>; taregger@earthlink.net; mldarpino@gmail.com; mapes ranch <maperanch@aol.com>; suzy lyons <sblyons@aol.com>; William A. S. Magrath II <wmagrath@Mcdonaldcarano.com>
Subject: Meeks Bay Vista Property Owners' Association - Proposed Bike Route - Confirmation of Ownership of Properties Adjacent to Proposed Bike Route.

Morgan:

Tony Evans, the Vice President of the Meeks Bay Vista Property Owners Association ("MBVPOA"), has asked me to send you this email and attachments I have prepared.

My name is Bill Magrath. My wife and I own a home at 8357 Meeks Bay Ave, just south of Meeks Bay, in El Dorado County. I am a member of the Board of the MBVPOA. As an attorney licensed in Nevada and California, I have volunteered to assist Tony Evans on "Bike Trail Issues." But I need to emphasize that Tony Evans is our Board's chief spokesman on this topic.

I briefly met you at a TRPA and TRPO Informational Meeting in Kings Beach in May 2016. I thanked you then and thank you again now for meeting with Tony Evans and walking this proposed Bike Path on the west side of Highway 89. Our entire Board has walked that proposed route and until you actually see the spectacular views offered by this route in person, it is hard to describe how this proposed bike route is so much superior than routing bicycles and walkers down the narrow and poorly paved Meeks Bay Ave. which was considered as a potential bike route in early plans. We are very pleased that the later versions of plans have referenced the more scenic route MBVPOA has proposed west of Highway 89. For instance, page 140 (of 279 pages) of the Linking Tahoe Active Transportation Plan (Final March 2016 version) mentions in Chapter 4 the proposed Bike Route you walked with Tony Evans.



Emerald Bay Proposal



Meeks Bay HOA Proposal

Below is the same proposed Bike Route using a photo from Google Earth. Note that future planners may consider a small “shortcut” near the north end of the Bike Route. This will eliminate some vertical climb and will also avoid intrusion onto private property which can be avoided by the shortcut.



Private vs. Public Property Impacted By Proposed Bike Route.

Tony Evans and the MBVPOA Board feel that one clear advantage of this proposed bike path is the fact that **this proposed route only impacts a few private property owners**. As the attached PDF demonstrates, most of the proposed route is surrounded by property currently owned by the U.S. Forest Service, State of California, or in a few cases, by the California Tahoe Conservancy. When the proposed Bike Route is on paved public roadways, those streets are much wider than Meeks Bay Avenue and provide superior views of Lake Tahoe and the Tahoe Basin.

To prepare the attached PDF, I traveled to the El Dorado County Assessor's Office to personally view the ownership records for every parcel associated with this proposed Bike Route. I was pleased to find that perhaps 85% to 90% of the properties adjoining this proposed route are owned by public agencies. Plus, if the shortcut is used, **no private property will be required or used to construct the proposed Bike Route**.

On the attached PDF, I have marked each of the El Dorado County Assessor Parcel Maps so that **all properties owned by public agencies are highlighted in yellow**. The proposed Bike Path is shown in **orange**. Starting from the Meeks Bay end of this proposed Bike Route (**A** on the Parcel Map below), you will see that 100% of all properties adjoining the proposed Bike Route are owned by public agencies up to the **B** mark. The abandoned dirt roadway (from A to B) is also owned by public agencies. I used the **A – B**, **B – C**, **C – D**, **D – E**, etc. markings on the Parcel Maps so you can follow the exact Bike Route Path through the El Dorado County Parcel Maps I have attached.



Note: On this map, I have placed a **dashed orange line** where the future Planners may want to install a shortcut – since this will avoid the Bike Path having to cross over private property on the Parcel Map showing the **B – C** portion of the Bike Route. Constructing the shortcut will also save some vertical climb on the Bike Path and will certainly be less expensive to install pavement on the shorter bike route.

Attached PDF of El Dorado County Parcel Maps.

While I am aware that there are currently no plans to select or design a Bike Path south of the Meeks Bay Resort, we wanted you and TRPA to have the information we have gathered which shows how this MBVPOA-proposed Bike Route will travel through and past so many properties owned by the public. A Bike Route down Meeks Bay Ave. will impact every single privately owned residence on Meeks Bay Ave. I will admit, when I back my car out of my garage onto the narrow Meeks Bay Ave., I am concerned about a bicyclist speeding into my reversing car on this narrow and bumpy county road.

I will admit I was surprised by how much property is owned by the USFS or State of California along this Bike Route. The **A – B**, **F – G**, **G – H**, **H – I**, and **J – K** pages show that these segments are almost 100% owned by the public. The abandoned dirt roadway is owned by the public also.

We recognize that the public agencies serving Lake Tahoe have limited funds and must prioritize projects so that the most residents receive the greatest benefit. We know that bike paths connecting Zephyr Cover with South Lake Tahoe or between Tahoe City and Kings Beach or Incline Village may have greater priority because of the population base living in that vicinity. But someday, should any planners proceed to design a bike path south from Meeks Bay Resort, we urge those planners and governmental officials to look at the route MBVPOA has proposed. There are “world class” views of Rubicon Bay, across the Lake to South Shore, and of the mountains to the east, from the abandoned dirt roadway west of Highway 89. There is no danger of vehicle/bicyclist/pedestrian conflicts on this wide abandoned roadway. There is room along this route, on land already owned by the public, for a scenic outlook for bicyclists and pedestrians who will want to stop and look at the grandeur of the Lake Tahoe setting.

Thank you for considering our research which illustrates the public ownership of most of this proposed Bike Route. I have all the back-up data I gathered from the Assessor’s Office on individual properties owned privately and by public entities and will forward that information if you request.

Thank you for being so responsive to communications from Tony Evans and our Board. The fact that you gave your time to walk this proposed Bike Route says a great deal about how responsive you are to the residents of the Lake Tahoe region.

Tony Evans and I stand ready to provide any additional information you may need. We are always ready to give tours to future planners – because a personal tour of this route helps sell it as the best alternative when funds become available to “link Lake Tahoe.”

Thanks again. Please call me if you have any questions.

Bill Magrath (Cell 775-750-3030)

William A. S. Magrath II | Partner



100 West Liberty Street | Tenth Floor
Reno, NV 89501

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Thank you, Michael for your comment on the Active Transportation Plan and the draft 2017 Regional Transportation Plan.

For clarification, the reference you make to page 2-7 in the Active Transportation Plan is noting what *would* make a strong multi-modal system – essentially offering guidance for Tahoe transit operators on how they can improve their services to be more multi-modal.

Federal and state laws prohibit more than 2 or 3 bike racks on buses depending on the size of the bus. However, that does not mean there are no other solutions, as you suggest. I know that TTD has been working on possibly using bike trailers. It's helpful to know which routes you think it would be best utilized on. I've cc'd George Fink so he sees your ideas and can follow up with you on how TTD intends to increase bicycle carry capacity on their buses.

Thanks again for your comments,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Michael Snead [<mailto:michaelsnead@directcon.net>]
Sent: Thursday, March 23, 2017 8:54 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Comments on the Draft 2017 Regional Transportation Plan

To: Morgan Beryl, Senior Transportation Planner, TRPA

Good Evening Mr. Beryl,

I am a mountain biker, living in Coloma, CA, who visits Tahoe at least a half dozen times a year with my friends to ride Tahoe trails. The current Active Transportation Plan contains many great improvements for cyclists, including bike paths and lanes on many dangerous and much-needed stretches of road, and I support those improvements!

However, I would like to call attention to one important improvement on page 2-7 of the Active Transportation Plan: "Buses have sufficient bicycle carrying capacity."

Right now, Tahoe buses carry either two or three bicycles on a front-mounted rack, which means somewhere between two bicycles per hour (on the 23 bus) and six bicycles per hour (on the 50 bus).

This is laughably insufficient - and it makes the bus useless as multimodal transport, since it's very likely that the racks are already full and I will be denied boarding.

As a mountain biker, I, and my friends, would like to use the 23 bus to access the Tahoe Rim Trail without running a car shuttle.

In general, I would love to be able to park my car once I arrive, and use a combination of bicycles and city buses to recreate. And no, I don't want to have to lock my bike to a rack at some random bus stop in town! The point is to have my bicycle available at both ends of the trip.

Accordingly, I strongly encourage you to make greater bicycle capacity on TTD buses - specifically the 23 and 50 buses - a major priority. I am told that bike rack trailers are the most realistic way to do this - but I support whatever increases bicycle capacity to the point that I can depend on no longer being denied boarding because the two rack spaces are already full.

Thank you for your time and attention to these requests,

Michael

Michael Snead

Cell: 530-295-1860

michaelsnead@directcon.net

Human beings, who are almost unique in having the ability to learn from the experience of others, are also remarkable for their apparent disinclination to do so. - Douglas Adams (1952-2001)

We do not stop playing because we are old; we grow old because we stop playing. Growing older is mandatory – growing up is optional. That said, pain is inevitable while suffering is a choice.

Hi Michaela,

Thank you for your interest in the Draft 2017 Regional Transportation Plan. I've responded to the main items of your comments below. Since your comments are transit related, I've cc'd our two transit operators so they are able to see your comments and ideas.

1. We are glad you are using transit service and agree that Tahoe has an opportunity to make public transit a world class service that residents, commuters, and visitors all utilize.
2. Increasing transit frequency to 15 minute intervals: We agree this would be optimal on highly used routes. Moving towards a 15 minute service on select routes is part of the plan, however at this time we are not confident we can fund that type of service. Additionally, we and our partners feel it prudent to move to 30 minute service first to ensure we are offering frequency in the correct areas and to build up use so that when 15 minute service is introduced it is well utilized.
3. Identification of bus stops: I know both the TTD and TART are working hard to improve and provide new shelters throughout the Region. Your idea of painting the curb red where bus stops exist may or may not be feasible in relation to roadway standards. I'll leave that up to the transit operators to address.
4. Bus Styling: Both transit operators have recently changed their branding and are turning over their vehicles to match the new branding. Once done, we'll only have two different brands in the Region, including Truckee.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Michaela <michaelarudis@gmail.com>
Date: March 11, 2017 at 4:39:24 PM EST
To: mberyl@trpa.com
Cc: info@tahoebike.org, asass@cityofslt.us, darciecollins@keeptahoebblue.org,
jbarnwell@tahoedailytribune.com, sfoltz@tahoedailytribune.com
Subject: 2017 Tahoe Transportation Plan

Dear Mr. Beryl,

I was excited to see the 2017 Plan for Transportation in the Tahoe area.

Addressing this issue is a big step forward. The Tahoe area has been slow to get on board with public transportation. An area that professes a focus on environmental issues, but doesn't offer a workable bus service, has been puzzling.

So the plan is definitely an improvement.

My comments on the specifics of the plan follow:

YES to free buses! Having free buses makes so much sense. Those who choose to take public transportation should be encouraged and rewarded for contributing to environmental improvements and the community well-being.

I'm also glad to hear that the bus service frequency will increase. HOWEVER twice an hour instead of just once an hour is not sufficient.

Buses need to run 4 times in an hour. This way when somebody arrives at a bus stop they know that in 15 minutes there will be a bus coming along. Riders won't have to worry about memorizing complicated schedules. Or get stuck for long periods waiting. The bus drivers are rarely able to stay exactly on time anyway, so offering a simple 15 minute window makes life easier for everyone.

Also in a climate that has such cold winters, having 4 buses an hour is the right thing to do. I got frostnip on my toes waiting for a late bus one night.

I would also like to see the bus stops more clearly marked in ways that are more easily identifiable from a distance. It seems that some bus stations have become defunct and it gets very confusing to know where the active stops are. Perhaps a red awning to match the Nifty 50 red buses would make an attractive, cohesive and easily identifiable look.

I also would like to see more uniform buses. It's very hard to know that a bus is coming to your stop when there are so many different styles.

The more pleasant the experience of riding public transportation, the more popular it will become. An area like Tahoe cannot afford to wait any longer.

Major ski resorts in Utah and Colorado have superior public transportation. When celebrities visit Sundance, even they take the buses. Both these areas have bus or train service where no one waits more than 5 or 10 minutes.

It is not just ski resorts either. Even Los Angeles is now on board with public transportation! And here in the Tahoe area, North Shore does a much better job than South Shore. Look at the economy of North compared with us and it is obvious they are getting more things right. Get with the times South Lake.

Having a superior public transportation option in Tahoe will also give the benefit of lessening the traffic on Highway 50. It will also improve the experience of living here. I would like to rely on the bus to get to

Stateline or different stores along Highway 50. Which brings me to another point.

Local business will benefit from better public transportation. I know from personal experience that often times I do not go out and shop or eat out or go to the movies because the bus is too annoying to use.

So far I choose to not drive in Tahoe. But the city makes it rough! If the bus system was improved; however, it would improve my quality of life here significantly. And I am not alone.

Mayor Sass said recently in the paper that he believes the public transportation system needs are driven by the tourist industry. And should be paid for by taxing the tourists. That is wrong. Public transportation is for the locals especially.

Locals should not have to drive and park in such a geographically small city. Locals should not have to spend so much extra time getting to and from places... especially work.

Right now with 1 bus an hour, in my opinion even with 2 an hour, it is too difficult to correctly time arrival to work. With 4 an hour, workers can feel safer knowing that they will be at work on time. Without having to spend an hour or even a half hour each way waiting for a bus. Seriously how would you like to waste hours a day waiting outside in the cold for a bus? Come on public employees, time to ditch the cars and see how the other half lives. As I said even with the improved twice an hour service, that's a lot of wasted time. We need 4 buses each hour.

And locals like to shop and eat out if it is a pleasant experience getting to and from their destinations. Walking to a free and frequent bus is much more enjoyable (and cheaper) than owning and driving a car. We have lots of locals here who would love to not have to use a car.

That saved money can be spent on local dinners out, shopping and entertainment. Maybe even saving for a home purchase. Mayor Sass really wants to help the locals financially? This would be huge!

Remember too the pollution will be reduced with less car use. I am puzzled that this is not already one of our top priorities here. Keep Tahoe Blue! Fight climate change! Time to follow words with action.

More parking spots will become available. The workers who are now scrambling for parking spots each day will be happy not to have that hassle and that frees up spots.

Yes tourists will love the service. But make no mistake, locals will love it even more.

Instead of jumping into the massively expensive and disruptive Loop Road idea, start with a focus on quality public transit. Sometimes you can spend less money and end up with much better results.

Environmentally and economically, it is the right thing to do.

Thank you for the plan and the improvements. I hope you will use these comments to make the public transit service benefit our city and environment by becoming a much more positive example. And put real action behind slogans like "Keep Tahoe Blue."

Michaela Rudis
South Lake Tahoe

Hi Ms. Schmidt:

I believe you are referencing the 2016 Active Transportation Plan, which was approved in March 2016. Currently, the Draft 2017 Regional Transportation Plan is open for public comment. You can find the Draft 2017 Regional Transportation Plan here: <http://www.trpa.org/regional-plan/regional-transportation-plan/>

However, I am happy to update you on the projects that have been completed in that area by Caltrans. This is a long section of roadway. In some areas there are 6 to 4 foot shoulders and in some areas there are no shoulders. We had requested of Caltrans to include bike lanes along this entire corridor, but unfortunately this is not what was implemented. I would have to defer you to them to understand why, but my guess is roadway width constraints.

Regarding adding a bike route through the Rubicon Area: This recommendation was taken out of the 2016 Active Transportation Plan to respond to the Meeks Bay HOA requests and has not been added back in.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: nancy schmidt [<mailto:nancyjsmail@gmail.com>]
Sent: Wednesday, March 08, 2017 12:48 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Re: Bike path/trail/route in Rubicon Area

Hi Morgan,
I thought I'd write again during your current public comment period.

In going over the 2017 Regional Transportation Plan Corridor Map I noticed there is a Meeks Bay HOA proposed bike path on the West side of Hwy 89 and complete street improvements along Hwy 89/Rubicon Bay. Did these water quality improvements include a bike lane? You had mentioned in your letter to me dated last April that Caltrans was attempting to add them as they were doing the water quality work.

I'd like to mention again that our neighborhood in Rubicon Park Estates, namely King George Dr., Sierra Dr., and Rubicon Dr. is opposed to routing bikes through our neighborhood. It would add traffic and

noise to our quiet streets and we have several blind corners that have the potential to be disastrous. I see this route is not currently on the plan but I'm assuming some sort of route/lane/path will be revisited at some point if lanes weren't added on Hwy.89.

Thanks for listening and if you can, let me know when our area is up for a feasibility study,
Nancy Schmidt

On Mon, Apr 11, 2016 at 11:20 AM, Morgan Beryl <mberyl@trpa.org> wrote:

Hi Nancy:

The "Lake Tahoe Scenic Bike Loop" or "Lake Tahoe Bikeway" was initiated by the Lake Tahoe Bikeway Partnership in 2010. You can read more about this on page 2-11 in the Active Transportation Plan. Essentially it is a way for people to get around the lake without having to use a car.

Caltrans has water quality projects that also include the addition of bike lanes or wide shoulders where there is space. As these projects are constructed so too are the active transportation facilities. Currently, this includes the Tahoe City area and Homewood area.

As you see in the Plan, we captured the Meeks Bay HOA ideas for where the active transportation facilities should go in that area (page 4-49 of Plan). It is up to the implementing agencies to conduct the necessary studies to see if these alignments are feasible and desired. Tony Evens I believe is in touch with those entities (Tahoe Transportation District & El Dorado County). Once those areas become a priority for those entities, I imagine they will start the study process.

Please let me know if you have any further questions.

Best,

Morgan Beryl
Associate Transportation Planner
[775-589-5208](tel:775-589-5208)
mberyl@trpa.org



From: nancy schmidt [mailto:nancyjsmail@gmail.com]
Sent: Thursday, April 07, 2016 3:49 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Bike path/trail/route in Rubicon Area

Hi Morgan,

We shared a couple of e-mails back and forth last year regarding the bike route that was then proposed to go through our Rubicon and Meeks Bay neighborhoods.

I know this route through our neighborhood has been removed from the map and is now sitting up on hwy. 89 as the "Lake Tahoe Scenic Bike Loop".

Can you tell me what that means? Will they be putting an official marked bike lane along 89? Maybe that's already been done? That would be so great!

Can you also tell me if there are plans to revisit the bike route through our neighborhood in the future?

Thanks so much Morgan,

Nancy Schmidt

Hi Ron:

Thank you very much for submitting comments and support for the draft 2017 Regional Transportation Plan. Your comment letter supported and incorporated the Truckee North Tahoe Transportation Management Association's comment letter. As such, we are supplying you and the North Lake Tahoe Resort Association a copy of our response to the Truckee North Tahoe Transportation Management Association. Please feel free to get in touch if you would like to discuss further.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Ron Treabess [<mailto:ron@gotahoenorth.com>]
Sent: Friday, March 24, 2017 3:48 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: RTP Comments

Hi Morgan

Don't know if this is of much value. My letter would have been pretty much as if I copied Jaime Wright's based on our discussions together. So the letter just says we are in agreement with and supportive of

the TMA letter. And of course, it drops a few well deserved fragrant petals in your path.
Great effort. Ron



Ron Treabess
Director of Community Partnerships and Planning



north lake tahoe

Chamber | CVB | Resort Association

Phone: 530-581-8735

Cell: 530-448-3873

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Ron@GoTahoeNorth.com

www.GoTahoeNorth.com

Lake Tahoe recently awarded "America's Best Lake" by the readers of USA Today and awarded # 1 ski destination with Rand McNally and Orbitz, and #1 travel destination with TripAdvisor

DATE: April 11, 2017
TO: Jaime Wright, Truckee North Tahoe Transportation Management Association
FROM: TRPA Staff
RE: Response to Truckee North Tahoe Transportation Management Association
Comments on Linking Tahoe: Regional Transportation Plan/Sustainable
Communities Strategy (Draft)

Dear Ms. Wright:

Thank you for Truckee North Tahoe Transportation Management Association's (TNT/TMA) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your comments on the draft plan and your partnership in delivering effective transportation in the Region and beyond. We have responded to TNT/TMA's comments and recommendations below.

1. Recommendation: Adding the 1-80 corridor summary into the plan.

Thank you for this recommendation. We agree that both the North and South entry corridors are major components to better managing congestion at Lake Tahoe. As you note in your letter, the 2017 Regional Transportation Plan's major focus is on the Discover Tahoe travel behavior pattern. This is one of the reasons we specifically highlighted the internal six corridors identified for the Region. Additionally, through our partnership with the Tahoe Transportation District's Corridor Connection Plan and Long Range Transit Plan, we know the two entry corridors will be addressed in much greater detail within those plans. Through these various planning efforts and the Trans-Sierra Coalition partners are delving into how to better plan, fund, and deliver joint projects for our North and South entry corridors. As this moves forward, and we begin planning for the 2021 Regional Transportation Plan, these entry corridors will be a much greater focus.

2. Recommendation: Incorporate more information on the Linkages between the Tahoe Region and the North Tahoe Truckee Resort Triangle.

Thank you for this recommendation. We agree that this 2017 Regional Transportation Plan and future Tahoe regional transportation plans can better connect, support, and leverage neighboring area's projects and programs. This is something we'll continue to work on over the next four years as we plan our update for 2021. At this time, we've added the following text to page 2-4:

"This plan also supports projects and programs in adjacent regions that directly connect or indirectly serve the Lake Tahoe Region. For example, the North Lake Tahoe-Truckee Resort Triangle includes two main entry points to Lake Tahoe and encompasses North Lake Tahoe, Squaw Valley/Alpine Meadows, Northstar, and the Town of Truckee. The joint coordination, planning and development of transit, trails, and adaptive traffic management are essential in this high-use recreation area. The Truckee North Tahoe Transportation Management Association

(TNT/TMA) provides a forum for collaboration among the public and private sectors to improve mobility in the Resort Triangle and beyond, including connections to Reno/Sparks and the Truckee Meadows. Other adjacent communities and regions are collaborating to improve access to and from Lake Tahoe, along highway corridors and in the backcountry. Examples include Carson City's plan to construct a single-track trail that will connect users from Carson to the Tahoe Rim Trail near Spooner Summit, and Douglas County's Pony Express Trail intended to connect the Carson Valley with Lake Tahoe in an area near Kingsbury Grade. These projects will provide additional non-highway access to recreation and increase safety by providing separated active transportation options for access to Lake Tahoe from neighboring communities."

3. Recommendation: Increased coordination with the Town of Truckee

Thank you for this recommendation. We've added additional text to encourage and highlight continued and robust partnership with the Town of Truckee. Please also see Attachment A, TRPA's response to the Town of Truckee's comments where we explain our rationale and intention for illustrating mobility hubs in the Truckee area.

New text has been added to page 2-5, which reads:

"Local Governments

This plan reflects collaboration with Washoe, Douglas, Placer, and El Dorado counties, Carson City, and the City of South Lake Tahoe to align transportation policies and deliver capital improvement programs. Additionally, Placer County, Town of Truckee and Washoe Regional Transportation Commission jointly fund Tahoe Truckee Area Regional Transit on the North shore and these services and funding mechanisms are included on the project lists and within the reasonably foreseeable revenue sources. As regional partners continue to broaden their work beyond traditional boundaries, coordination with the Town of Truckee is vital."

4. Recommendation: Increase coordination with TNT / TMA.

We very much appreciate TNT / TMA's partnership in delivering and advertising efficient, customer oriented, and innovative transportation options. We also hope to work closely with TNT / TMA as we update and deliver transportation management programs. We look forward to this partnership.

5. Clarification Request: South Shore Water Taxi Service vs. North Shore Water Taxi Service.

These two projects are Tahoe Transportation District (TTD) led projects. During the development of the regional transportation plan project list, TTD requested the South shore service be included on the constrained list if feasible, and the North shore service be included on the unconstrained list. Our understanding is the South Shore Water Taxi Service would be a public private partnership requiring much less cost to deliver and as an appropriate phased approach to complimenting the crosslake ferry service. The North shore service may require larger scale funding and capacity that the TTD and TRPA at this time, does not see feasible with existing funding sources. However, as we discussed, this is a good project for the various partners to collaborate on to ensure an appropriate phased or bundled approach for delivery of services. TRPA would be happy to facilitate this discussion amongst the various partners, as the ferry service gets closer to being delivered.

6. Support: Must Think Beyond Traditional Sources of Funding

Thank you for supporting our Governing Board's Funding Task Force which plans to look at various funding mechanisms to better support and deliver the transit, trails, and technology projects and programs located within this plan. We welcome TNT / TMA's partnership.

TRPA appreciates the TNT / TMA's comments, partnership, and support for the 2017 Regional Transportation Plan and looks forward to our continued partnership.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency



north lake tahoe

Chamber | CVB | Resort Association

March 23, 2007

Morgan Beryl
Senior Transportation Planner
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

Re: North Lake Tahoe Resort Association Comments the Regional Transportation Plan

Dear Morgan,

Thanks, so much, for all you have done for the Lake Tahoe community in the preparation of the *Linking Tahoe Regional Transportation Plan* (RTP). The North Lake Tahoe Resort Association (NLTRA) has reviewed this quality plan and believes that it presents many innovative approaches for transportation improvements that will continue to be developed in more detail in subsequent upcoming transit and transportation planning efforts.

As you know, the NLTRA works very closely with the Truckee North Tahoe Transportation Management Association (TMA), Placer County, and the Resort Triangle Transportation Vision Coalition. Through these partnerships, we have had discussions as to the strong level of completeness and the minor improvements to the RTP, of which we all can be supportive. We also would like to compliment Jaime Wright, Executive Director of the TMA, for capturing all of these points in the TMA comment letter delivered to you and presented to the Governing Board.

Consequently, the NLTRA would like to express our total agreement with the comments you have received from the TMA and encourage the plan to incorporate the recommendations as have been made. We also agree with the suggestions as to how to better move forward with implementation of the plan, once approved.

Thank you again, Morgan, for your continuous efforts in making the RTP a reality, and for the opportunity to provide comments on the draft plan.

Sincerely,

Ron Treabess
Director of Community Partnerships and Planning
North Lake Tahoe Chamber/CVB/Resort Association

Thank you, Joanne for forwarding Mr. Nilsson's comments on the draft 2017 Regional Transportation Plan to me.

Mr. Nilsson: you are correct that parking management strategies must be in place to encourage visitors and residents to walk, bike, and use transit. This is a priority for TRPA. Here are some of the strategies the plan proposes:

1. Identification of park and ride lots (also called mobility hubs), both inside and outside of the Region. This will help create a park once mentality where people can park and then hop onto buses or trails to get to destinations that are congested and have limited parking.
2. Parking Management Strategies. Many of our policies and codes encourage progressive parking management strategies that promote consolidating private parking into shared-parking, paying in-lieu fees rather than requiring parking minimums by local jurisdictions, better wayfinding to existing public lots, and using dynamic demand-based parking fee systems to discourage parking in highly congested areas at peak times. Additionally, we encourage restricting highway shoulder parking to increase safety for all roadway users, reduce environmental impact through erosion, and encourage people to use transit to get to their destinations or park once outside of congested areas. We are working closely with local jurisdictions, state departments of transportation, and public lands agencies to see delivery of these types of projects.

Overall, the Tahoe Region is seeing success in this approach. Parking studies have been conducted in Placer and Washoe Counties. The Placer County Area Plan has aggressive and progressive parking management strategies within their policies and in their proposed projects within the draft 2017 RTP. The Tahoe Transportation District in partnership with Washoe County, NV State Lands, and others are building off highway parking amenities within the SR 28 corridor while restricting highway shoulder parking, including fees for off street parking, and incorporating real-time technology to provide parking availability information to users before they chose to drive to destinations and encourage them to use transit instead. TRPA will continue to support this work by our partners.

Please let me know if you would like to discuss further,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: Joanne Marchetta
Sent: Friday, March 24, 2017 9:47 AM
To: oblio nilsson <prdfree@gmail.com>
Cc: Morgan Beryl <mberyl@trpa.org>
Subject: Re: Parking v Transit

Thank you Mr. Nilsson for your comments. We see the need to manage parking so as to encourage the use of transit. The newly proposed update to the Regional Transportation Plan includes policies and

projects to do so. I am passing on your comments to our staff for a more complete response. Thank you for your constructive thoughts and interest.

Joanne S. Marchetta
Executive Director
Tahoe Regional Planning Agency
775.589.5226

> On Mar 23, 2017, at 4:59 PM, oblio nilsson <prdfree@gmail.com> wrote:

>

> Is TRPA a planning agency or a tourist agency?

> Is TRPA not charged with protecting the air, water and natural resources of the area?

> Recently there have been several news articles about the shortage of parking at Lake Tahoe, including AP. They quoted Carl Hasty of TTD South Shore stating that there is a 6000 to one visitor to parking ratio. He also stated that this must be addressed and is somehow related to the need for more parking in order to enhance Transit.

> This is absolutely wrongheaded and essentially shows a lack of understanding of car culture and transit.

> I have worked in Transit at North Shore for 14 years as a bus driver, manager, and Trainer. People will not get out of their cars if you make it easy for them to drive and especially park their cars. Please point out any study that shows that this not true.

> Actually, the opposite is true; the more difficult you make it to use an automobile, as in parking etc, the more likely they will take public transportation. Have you gone to San Francisco lately?

> The answer is not more parking, but less. Instead of building more parking lots which cause environmental problems; permeability, heat, runoff, etc, buy more busses or build tram systems.

> If more parking is needed to attract tourists for gambling and skiing (outside area Corporate interests), then build them out of the area. Put up kiosks on all highways into the basin and charge \$20 to bring your vehicle into Tahoe. We could call it a mitigation fee. (You know what that is don't you?) At the same time you offer them free secure parking and a free shuttle into the Basin. Most of them will pay the \$20. This has been proposed before, but has been opposed by the tourist, gambling, ski industries.

> At the very least, if more parking lots are going to be built, they need to build a bus stop and buy a bus for each one.

> Finally, you and your cohorts need to decide whether we are a tourist destination or a natural resource.

> Go ride a bus!

Hi Patty:

Thanks for reaching out and your interest in the Regional Transportation Plan. There are two projects in Meyers:

1. U.S. 50 and SR 89, which is a Caltrans sponsored project which will convert that intersection to a roundabout. You can learn more about that project here:

<https://eip.laketahoeinfo.org/Project/Summary/03.01.01.0018>. This project is expected to start construction in 2019 and has already finalized their environmental analysis.

2. U.S. 50 and Pioneer Trail, which is a County sponsored project funded through the Highway Safety Improvement Program and will most likely be a roundabout, however still needs to undergo environmental analysis and design. You can learn more about that project here:

<https://eip.laketahoeinfo.org/Project/Summary/03.01.02.0074>

The Regional Transportation Plan does not go into specific detail on every project, but rather talks about the many projects that are planned, as well as provides a project list to ensure project eligibility for State and Federal funding. These two projects are under the Corridor Revitalization category. You can find the List of Projects in Appendix B: http://www.trpa.org/wp-content/uploads/Appendix-B_Project-List-and-Revenue-Narrative.pdf. You can read about Corridor Revitalization Projects and roundabouts in general in Chapter 3.

Please feel free to get in touch with any further questions.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]

Sent: Thursday, February 23, 2017 4:41 PM

To: Morgan Beryl <mberyl@trpa.org>

Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Patty Psilopoulos <alohagreg@sbcglobal.net>

Subject: [your-subject]

Message Body:

Hi. I live in the Meyers area of South Lake Tahoe. Keep hearing about roundabouts being put in but couldn't find the info in your report. Could you direct me to the correct spot to read about this? Thanks for your time, Patty Psilopoulos

--

This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)



April 10, 2017

via email: mberyl@trpa.org

Tahoe Regional Planning Agency
Morgan Beryl, Senior Transportation Planner
PO Box 5310
Stateline, NV 89449

Subject: Placer County Comments on the Draft 2017 Regional Transportation Plan and Mitigated Negative Declaration

Dear Ms. Beryl:

Placer County appreciates the opportunity to review the Draft 2017 Regional Transportation Plan and Mitigated Negative Declaration and to engage in the environmental review process. Having partnered with the TRPA and the TMPO on the preparation of the Placer County Tahoe Basin Area Plan and the TART Systems Plan, the County is pleased to collaborate with you on Draft 2017 Regional Transportation Plan to ensure its alignment with the goals and objectives of those planning efforts. The County looks forward to working with the TRPA and TMPO to help identify future funding to implement regional transportation strategies that will improve the North Lake Tahoe communities within Placer County. The County's Environmental Review Committee has reviewed the Draft 2017 Regional Transportation Plan and Mitigated Negative Declaration (MND) and offers the following comments for your consideration:

General Comments:

As the plan states, "the bulk of the responsibility for building and maintaining Lake Tahoe's transportation system lies with transportation partners". Funding of constrained and unconstrained projects will most certainly require partnerships with stakeholders into the future. Many of the projects that have been included on the constrained list have only partial funding identified and therefore questionable for inclusion. Placer understands from conversations with TRPA staff that projects were qualified for the constrained list when the project was determined to have a high likelihood of being fully funded through grant funding programs being administered by TRPA or other State and Federal grant programs. As some of these sources are uncertain and local funds are currently unidentified to fully fund these projects, Placer County would caution inclusion of these projects on the constrained list. Future funding strategies for construction and/or implementation of these projects will require stakeholder partnerships. Additionally, funding for O&M projects such as winter trail and road maintenance will be funding-dependent annually.

Executive Summary Comments

1. Pg. ES-1: Please check data regarding the statement that "upwards of 24 million people" travel to Lake Tahoe each year. The County's understanding is that a recent presentation identified that these are actual "trips" as calculated per cell phone in a vehicle (say from RTIA into the basin, stop at a gas station, stop at the grocery store, stop at a hotel, go out to dinner). Would this scenario yield five people if only one person were in the car?

We have updated this text to read "Newly-available data show that nearly 10 million vehicles travel to Lake Tahoe each year."

2. Pg. ES-2: See attached suggested modifications to map "Envisioned Tahoe Region Transportation System".

Thank you for these edits. We've updated our maps to reflect your changes.

3. Pg. ES-5: Where is constrained/identified operating revenue to "launch passenger ferry service for cross-lake water transit. . ." coming from? Depending on projected P/VSH, it might be more cost efficient to invest in transit.

Based on project information from TTD this project is anticipated to utilize a public / private partnership. If TTD chooses to utilize its transit allocation remains to be seen.

Chapter 1

1. Pg. 1-3:
 - Select 'Rail' as option for commuters. Many people commute from Reno, rail routes identified in the plan include Reno/Tahoe routes.

Thank you for this edit. We have updated Figure 1.1 to reflect your comments.

2. Pg. 1-7:
 - For automobile description, include carpool incentive programs. Current emphasis is on transfer from ride lots to public transit. The focus should be on reducing vehicles to ride lots as well.

Thank you for this edit. Added "Technology is used to incentivize car-share and carpooling programs."

3. Pg. 1-12, Goal #3-Safety:
 - Should also include winter conditions, road construction/maintenance activities.

These issues are captured under Goal 6: System Preservation.

4. Pg. 1-17, Figure 1.8-Dynamic Transportation System:
 - This figure is confusing. Conveys a reduction in transportation infrastructure as number of people increase during holiday season.

This is a complex concept we are trying to illustrate. The diagram is trying to convey that our system is sometimes over capacity and under capacity, and that what we strive to do through this plan and it's associated projects is be responsive to demand.

5. Pg. 1-21:
 - TART information is incorrect. 30-minute service is provided in the SR/89/28 corridor. The Plan suggests one hour service only.

Thank you for this correction. Updated to "TART transit service operates at 60 minute year-round with exception of 30-minute service in the peak summer and winter seasons. TART's hub and a park and ride lot are located in Tahoe City at the existing Transit Center."

6. Pg. 1-22:

- TART information is incorrect. 30-minute service is provided between Crystal Bay and Tahoe City. The Plan suggests one hour service only.

Thank you for this correction. Updated to "TART transit service operates at 60 minute year-round with exception of 30-minute service in the peak summer and winter seasons."

Chapter 2

1. Pg. 2-10:

- Include www.laketahoetransit.com.

Thank you for this edit. I confirmed with the Town of Truckee and the Truckee North Tahoe Transportation Management Association that the preferred web address is www.tahoetruckeetransit.com. As such we added "www.tahoetruckeetransit.com is a Placer County and town of Truckee joint website managed by the Truckee North Tahoe Transportation Management Association that provides information for the TART system. The website includes fixed route schedules, transit directory, airport shuttle information, and access to "nextbus" which tells users exact bus time arrival."

2. Pg. 2-21:

- Under Transit Service, include reference to the TART Systems Plan Update and planned expansion of TART services.

Thank you for this edit. Added "TART completed the TART Systems Plan Update, ridership surveys and is implementing portion of the systems update plan."

3. Pg. 2-21:

- Include construction of bus shelters (photo of shelter should also be included).

Thank you. Added "Many bus shelters have been constructed including in Sunnyside and in the Dollar Hill Area." We do not have space for an additional picture. There is a picture of a shelter on page 3-7.

4. Pg. 2-21:

- Under trails, suggest reference to snow clearing to provide access and address safety.

Thank you for this edit. Added "Shared-use paths are being maintained for year-round use to provide access and increase safety in Placer, Washoe, El Dorado counties and the City of South Lake Tahoe."

5. Pg. 2-23:

- Suggest inclusion of public-private partnership opportunities.

We discuss public private partnerships in Chapter 4 and Chapter 6.

Chapter 3:

1. Pg. 3-1:

- States "manage congestion by spreading out when and where people decide to travel." This idea is never fully fleshed out. How is it accomplished?

This will be accomplished through implementation of the many strategies, projects, and programs located within the Plan.

2. Pg. 3-3:

- Another reference to "spreading out these peaks" during summer and winter. Not sure it is possible to do that given the demand at those times of year.

Transportation demand management programs, technology, parking management systems, adaptive roadway management, and more all work together to disperse travel time, mode, and location.

- Suggest adding a sentence explaining how transportation infrastructure projects can take opportunities to integrate beneficial stormwater or drainage controls as an ancillary benefit to water quality. Emphasize the opportunity for "multi-benefit" projects that improve or upgrade transportation infrastructure in addition to, or alongside, water quality improvements (i.e. conveyance controls, paving, treatment, and infiltration opportunities).

Thank you for this edit. Added to page 2-4, reads "Transportation projects leverage water quality improvements by including stormwater and drainage controls into on and off roadway projects."

3. Pg. 3-4:

- The last paragraph alludes to reducing the amount of parking required for new development projects. Placer County touches on this in the Area Plan but it isn't mentioned here. The Area Plan should be cited as an example of this.

Thank you for this edit. Added "The Placer County Tahoe Basin Area Plan is an example of how these types of policies are put into place."

- Last sentence should read: "Strategy detail(s) are outlined in chapter under..."

Thank you for this edit. Updated with "s"

4. Pg. 3-6:

- On inter-regional services there is reference to "frequent" service by bus and rail. Frequent needs to be defined, particularly as it pertains to rail. One trip per day is not frequent.

We will continue to work with our partners to define an appropriate frequency as it relates to inter-regional service.

- Last paragraph, first sentence should make reference to TART, not just Placer County.

Thank you for this edit. Updated to "Two transit operators, Tahoe Transportation District (TTD) in the south and Placer County and the Town of Truckee who jointly operate TART in the north, provide local bus services at Lake Tahoe."

5. Pg. 3-7:

- Under Regional, Local, and Community Services, it states some routes go as late as 12:59 am, when in fact the Night Rider service goes later.

Thank you for this edit. Updated to "2:00am"

- Under Inter-Regional services there is reference to Amtrak and Greyhound running three times daily. Clarification is needed here as it sounds like there is three of each per day.

Thank you for this edit. We reviewed the text and believe our intent is clear. If you have additional text you can provide to better clarify, we'd be happy to review it.

6. Pg. 3-9:

- Drop the "s" on congestions in the first sentence.

Thank you, updated.

- It says both transit systems will be free to the user. The County is aware that this has been considered, but has it been officially approved for implementation? By 2020? There is also another reference on page 3-11.

We have implementation start year as 2022. While we understand it is not part of the constrained TART System Update Plan at this time, through our foreseeably available funding analysis, we believe it's possible to fund this by 2022. Additionally, we can evaluate feasibility of this project for the next RTP update, slated for 2021 which is before the expected implementation start date.

7. Pg. 3-12:

- Under Transit Priority Access, only allowing transit, bike, emergency, and local traffic during peak periods seems like it would only work on the South Shore.

We believe, through adaptive roadway management this is possible on all entry roadways.

8. Pg. 3-13:

- Map is confusing; please add a fee.

It is very difficult to show the entire transit vision in one map. This is best map we have for this purpose. The Long-Range Transit Plan, due out soon by the TTD will have many more maps with greater detail by corridor. Fees are addressed within plan text.

9. Pg. 3-16:

- "All scales of government plan..." not sure what scales means here.

Thank you for this edit. Updated to "levels"

10. Pg. 3-18:

- Under Connecting Off-Street to On Street, there needs to be reference to Tahoe City mobility improvements.

We do not believe this an appropriate place to call out Tahoe City Mobility improvements. They are already referenced on page 3-35, first paragraph.

11. Pg. 3-19:

- See attached suggested comments on map Figure 3.5 (Shared-Use Path Gaps).

This map has been updated to include your edits.

12. Pg. 3-21:

- See attached suggested comments on map Figure 3.6 [Short Term (2017-2020) Active Transportation and Corridor Revitalization Projects].

You are noting an existing path. This map does not show existing paths. It shows short term projects for shared-use paths and corridor intersection improvements.

13. Pg. 3-26:

- Under Safety, also include State Route 267 for variable speed signs.

Thank you, added.

14. Pg. 3-33:

- Under Operations, Maintenance, and Rehabilitation, is this a potential place to mention a BAD?

Thank you for this comment. We've added "Benefit assessment districts help support much needed maintenance of sidewalks, lights, and other aesthetic elements of streetscapes through agreements with property owners who directly benefit from infrastructure. Placer County is seeing success with benefit assessment districts in Kings Beach and is looking to continue this type of agreement in Tahoe City."

Chapter 4

1. Pg. 4-3 and 4-4:

- How do the funding numbers provided in the last paragraph before "Funded, Constrained Vision" line up with "Foreseeable Revenue Sources" on page 4-4. Maybe a clearer linkage would be helpful?

The last sentence in this paragraph states "The projects on the constrained list match the foreseeably available revenue sources with approximately \$100,000 remaining."

Chapter 5

1. Pg. 5-1:

- Under Performance Measures, some transportation projects with classic Transportation Performance Measures (such as miles of new trails) can be integrated with water quality performance measures as well (sediment reduction).

We discuss this in many places and also added text you suggested regarding multi-benefit into chapter 2.

Appendix B

1. The Lakeside Trail does not appear to be listed.

As we discussed, this project is still in such preliminary phases that it is not specifically called out on either the constrained or unconstrained project list. However, if the project moves forward and would like to be eligible for funding, it can use the "rolled up" line item within the Active Transportation category of the constrained list that incorporates all projects from the Active Transportation Plan.

Appendix D-13

1. In the TAU table, only 25 TAUs are attributed to Placer from the 1987 Plan (these would be from Tahoe City). There should be 12 more from the North Stateline Community Plan. The County believes that is what is shown through Washoe County (45) as 12 went to the County and 33 went to the Boulder Bay project, however the County's TAU count is not accurately portrayed here.

The accounting used for the RTP modeling of land use changes reflects a cutoff date of the best information available as of December 31, 2014. TRPA used this cutoff date since land use regulations and accounting is constantly being updated and staff needed time to complete the modeling. Subsequent analysis by TRPA identified that the changes to the North Stateline Community Plan, which split the North Stateline Community Plan into separate California and Nevada plans, allocated the previously existing supply of TAUs. As a result of these changes, TRPA updated the accounting of TAUs for Placer County to 37 TAUs. These updated totals are shown in Table 12-11 in Chapter 12 of the Threshold Evaluation report at: www.trpa.org/wp-content/uploads/18_Ch12_Implementation_FINAL_9_30_2016.pdf. Future analyses and model runs will use the most up-to-date figures.

Attachment 2 – Project List Comparison

1. Project # 03.01.02.0055 (TART Local Service Enhancements): Implementation year should be 2016.

Thank you, we've made this edit in the EIP Tracker. All projects on the RTP list start in 2017 or later. On the RTP list, we've edited to start in 2017.

2. For the Placer County Project #03.01.02.0056, TART Transit Fleet and Facility Upgrades, the cost in Current Year of Expenditure is \$8,996,802. This cost should be revised to \$3,500,000 to be consistent with the capital plan in the TART Systems Plan Update. \$2,400,000 of that cost is considered in the TART Systems Plan to be funding constrained.

Thank you for this edit. We've made the edit in the EIP Tracker and on the RTP list.

3. For TART services, inclusion of short term vs. long term seems unnecessary. The implementation start year speaks for itself.

This language was included to differentiate projects with the same name as they appear in the EIP project tracker. It is more clear to the public by designating long, short, medium.

4. Under Programs, suggest including trail maintenance and snow removal (projects appear to be 'new' construction but list could include planned maintenance activities of Class I trails).

We include deferred maintenance that includes snow removal needs on unconstrained list.

Again, Placer County appreciates the opportunity to comment on the Draft 2017 Regional Transportation Plan and Mitigated Negative Declaration. The County also appreciates the opportunity its staff has had to meet with TRPA to coordinate on the project and to discuss some of the items identified in these comments. The County welcomes close coordination on the 2017 Regional Transportation Plan to ensure that the County/TRPA transportation strategy is comprehensively planned. We look forward to working together to implement the Regional Transportation Plan alongside the County's Tahoe Basin Area Plan and the TART Systems Plan. Should you have any questions regarding our comments or attached map mark-ups, please contact me at cjacobse@placer.ca.gov or 530-745-3085.

Sincerely,

CRYSTAL JACOBSEN
Environmental Coordinator

Enclosures:

- County notes on map "Envisioned Tahoe Region Transportation System.
- County notes on map Figure 3.5 (Shared-Use Path Gaps)
- County notes on map Figure 3.6 [Short Term (2017-2020) Active Transportation and Corridor Revitalization Projects].

cc: David Boesch, CEO
Jennifer Merchant, Deputy CEO

Steve Pedretti, CDRA Director
Peter Kraatz, DPWF
Will Garner, DPWF

Envisioned Tahoe Region Transportation System

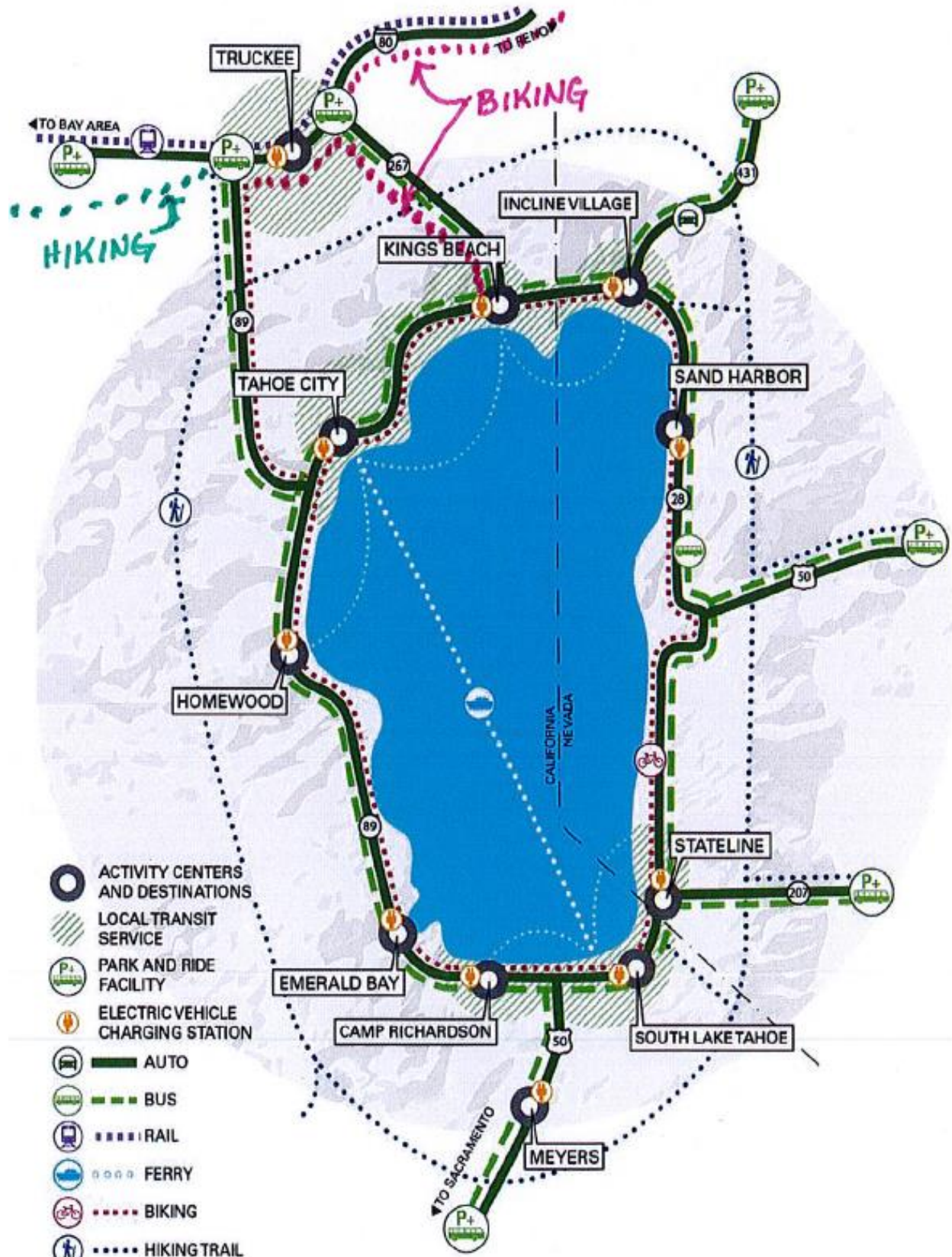
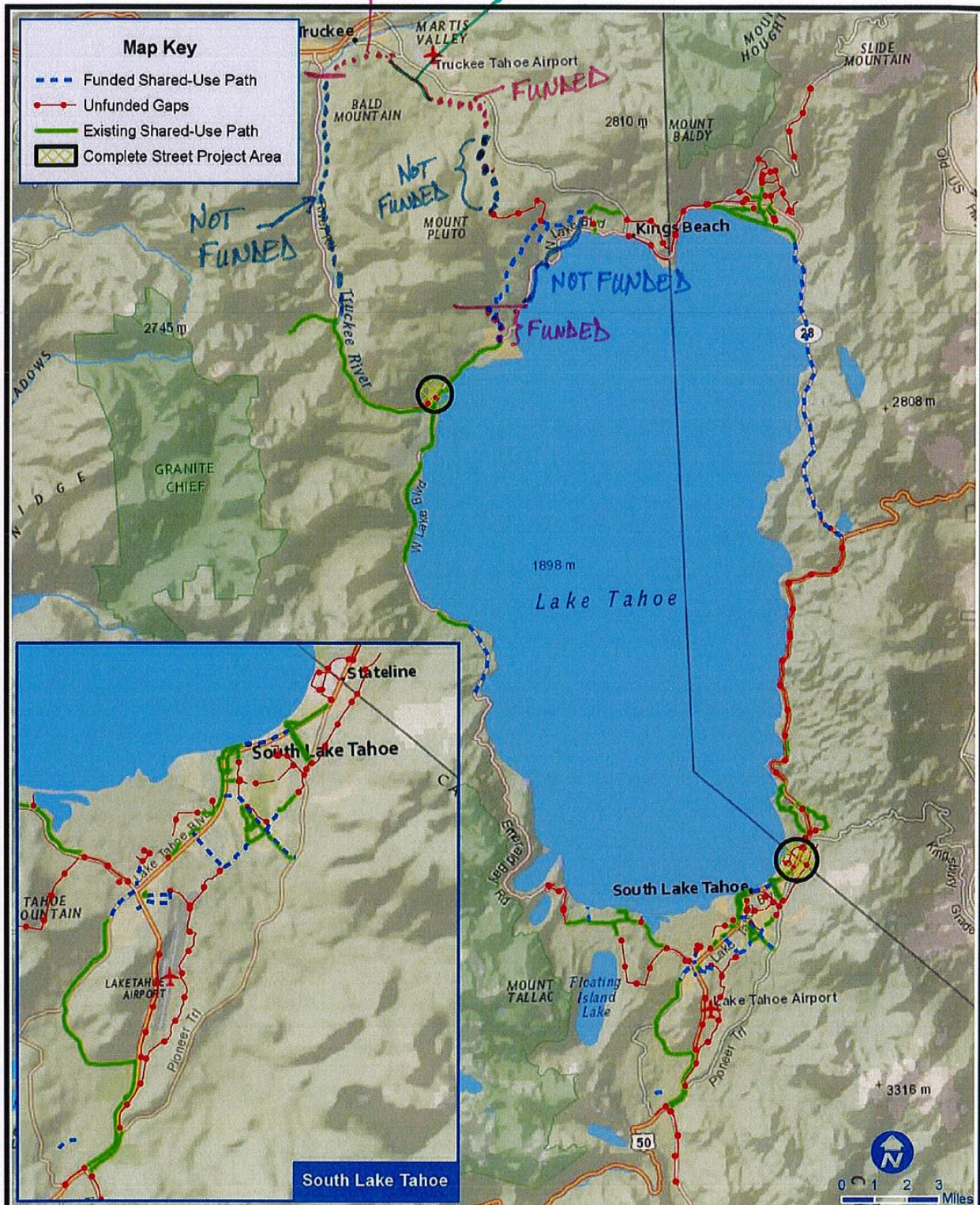


Figure 3.5: Shared-Use Path Gaps



EXISTING





Mail

PO Box 5310
Stateline, NV 89449-5310

Location

128 Market Street
Stateline, NV 89449

Contact

Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 11, 2017
TO: Erik C. White, Placer County Air Pollution Control District
FROM: TRPA Staff
RE: Response to Placer County Air Pollution Control District Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Mr. White:

Thank you for Placer County Air Pollution Control District's (the District) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your comments on the draft plan and your partnership in delivering environmentally friendly transportation options and innovations in the Region and beyond. Thank you for your support of the vision located within this plan. We have responded to the District's comments and recommendations below.

1. Recommendation: Transportation System Integration - the District suggests that the 2017 RTP/SCS consider promoting a local bike sharing network.

Thank you for this recommendation. The 2016 Active Transportation Plan recommends a regional bikeshare system at Lake Tahoe. Please see page 5-4 of the [Active Transportation Plan](#). Additionally, TRPA is discussing the possibilities of a bikeshare program with various in region and neighboring region stakeholders. As these projects become a reality, they will be part of our transportation demand management programs.

2. Recommendation: Technological Innovation – The District suggests the 2017 RTP/SCS also consider promoting the introduction of electric transit buses in the region.

Thank you for this recommendation. This 2017 plan includes many projects on the constrained project list that will include the purchases of more environmentally friendly and Tahoe appropriate public fleets. Additionally, regional transit operators are already utilizing these technologies. A few examples include:

- Recently Tahoe Transportation District (TTD) received Congestion Mitigation and Air Quality funds, distributed by TRPA, to purchase two electric busses for their 50 Route. Additionally, the TTD operates two compressed natural gas buses with the remaining fleet bio-diesel. As TTD replaces their fleet, they are looking at electric vehicles, including three diesel-electric hybrids they plan to purchase from Las Vegas.
- Liberty Utilities is submitting an application to the California Public Utility Commission for electric bus charging infrastructure.
- Placer County's TART system has 14 buses in total, 12 of which are compressed natural gas. All future bus expansion plans for TART will utilize alternative fuels.

Additionally, Appendix A to the plan includes policies to support the use of plug-in electric and zero emission vehicles and the deployment of the associated charging station infrastructure and promote the Tahoe-Truckee Plug-in Electric Vehicle (PEV) Readiness Plan. This includes Policy 1.4 which reads:

“Facilitate the use of electric and zero emission vehicles and fleets by supporting deployment of vehicle charging infrastructure within the Region, and supporting incentives and education of residents, businesses, and visitors related to the use of electric and zero emission vehicles.”

The inclusion of “fleets” in this policy is meant to show support for the deployment of electric buses. In addition, the Tahoe-Truckee PEV Readiness Plan will be producing a specific toolkit for fleet owners that will include medium-to-heavy duty vehicle guidance useful for electric bus deployment, in addition to light-duty vehicle guidance. Below are a few more specific citations for how the 2017 Regional Transportation Plan promotes PEVs and ZEVs:

- Page 1-9 provides a technology oriented map figure that envisions a region in which one can easily use electric vehicles because Lake Tahoe has PEV stations conveniently located all around the Lake as well at key marinas for electric boats. Other references to this vision are on pages 1-27, 2-9, and 2-11.
- Page 2-7 addresses PEVs within the “Greenhouse Gas Emission Reductions” part of the plan. This section states that the proposed PEV planning is forecasted to reduce per capita transportation GHG emissions by 1.7% by 2035.
- Page 3-24 describes the PEV planning and notes that the goal is to establish the Tahoe-Truckee Region as a plug-in electric vehicle (PEV) destination, gateway, and leader in mass deployment supported by robust education and engagement, a convenient network of charging infrastructure, streamlined charger installation, and standardization of policies.
- Page 3-26 and Figure 3.7 describes the Alternative Fuels Infrastructure planning, the US Federal Highway Administration signage ready designation on I-80 and US 50, and the existing conditions and actions derived from the PEV readiness planning process.
- Page 3-28 describes rewards for using electric vehicles or travel alternatives and page 6-5, briefly describes the implementation phase of this work.

3. Recommendation: Renewable energy for transportation electrification plan - The District suggests the 2017 RTP/SCS link the regional transportation electrification plan with renewable electricity generating from bioenergy facilities.

Thank you for this recommendation. We agree that renewable energy is a key component to continuing to support a sustainable transportation system. Through the Lake Tahoe Sustainable Communities Program, TRPA is monitoring the progress at the Cabin Creek facility. Additionally, the overarching vision for the PEV Readiness Plan is to encourage widespread use of renewable energy sources: *Establish Tahoe-Truckee as a leader in mass PEV deployment supported by robust PEV education and engagement; a convenient network of charging infrastructure; streamlined charger installation; standardization of codes; and widespread use of renewable energy resources.*

In addition, the PEV Readiness Plan sets a 2035 goal to reduce transportation greenhouse gas emissions by 1.7% per capita by supporting greater use of PEVs and ZEVs. Lastly, the PEV Readiness Plan has successfully convened a cross-regional coordinating council that included participation from different localities and interests (including utilities, local governments, the chambers of commerce, schools, etc.). TRPA anticipates further collaboration and partnership with these organizations, particularly with the local utilities organizations and staff is committed to promoting the use of renewable and alternative energy sources to lessen air quality impacts and fossil fuel usage in the Region.

TRPA appreciates the District's comments and support for the 2017 Regional Transportation Plan and looks forward to our continued partnership in delivering innovative environmentally friendly vehicle options.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

March 24, 2017

Ms. Morgan Beryl
Senior Transportation Planner
Tahoe Regional Planning Agency
128 Market Street
Stateline, NV 89449

RE: Draft 2017 Regional Transportation Plan/Sustainable Communities Strategy

Dear Ms. Beryl,

The Placer County Air Pollution Control District (District) is pleased to review the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) released on February 22, 2017. The draft 2017 RTP/SCS provides updates to the 2012 RTP/SCS and identifies the transportation related policies, projects, and programs planned for implementation in the Tahoe region through 2040. The District supports the vision to build more efficient transportation systems with improved transit services and trail networks that will give residents, visitors, and commuters better travel options in the region. The District believes that the implementation of the 2017 RTP/SCS will achieve the goals of improving traffic flow and air quality in the Lake Tahoe Region, as well as helping the Lake Tahoe Region to meet mandatory greenhouse gas reduction targets. The District provides the following feedback for your further consideration.

Transportation system integration

The 2017 RTP/SCS provides a vision of connectivity via regional partnerships to offer various types of travel options including air, rail, automobile, bus, and ferry for visitors to the Lake Tahoe Region. Visitors can then use the local interconnected system of transit and trails to reach their desired destinations. The local interconnected system proposed by the 2017 RTP/SCS includes convenient public transit services, widespread electric vehicle charging stations, and safe biking and walking trails. Biking can be good travel option for visitors to link their destinations and local mobility hubs (such as bus stops and transit centers). In addition to relying on visitors using their own bikes, the District suggests that the 2017 RTP/SCS consider promoting a local bike sharing network, which will offer a convenient rental method through personal digital devices so visitors can easily obtain and return bikes at each bus stop or transit center. This would encourage visitors to consider using regional and local transportation services rather than their own automobiles when they are planning trips to the Tahoe region.

Technological innovation

The District supports the plans to develop an auto-sharing program in the region and to build electric vehicle charging stations to promote the use of personal electric vehicles. In addition to promoting the use of light-duty electric or zero-emission vehicles, the District would suggest the

2017 RTP/SCS also consider promoting the introduction of electric transit buses in the region. The implementation of the 2017 RTP/SCS will expectedly increase public transit services in the region, and electric transit buses are an excellent clean technology application for further reducing the air pollutants and greenhouse gas emissions comparing with traditional diesel or natural gas buses. California Senate Bill 350 (SB 350) directs the expansion of transportation electrification to assist in achieving the goals of clean energy and statewide greenhouse gas reduction targets. Investor-owned utility providers such as Pacific Gas & Electric (PG&E) and Southern California Edison are required to develop programs to increase the use of electric power for vehicles, buses, vessels, boats, trains, and other mobile pollutant sources. The 2017 RTP/SCS should include this legislative declaration and coordinate with local public transit partners and utility providers to develop a regional plan for accelerating this clean energy application.

Renewable energy for transportation electrification plan

The 2012 Regional Plan Update includes goals to promote the development of alternative energy sources to lessen air quality impacts and fossil fuel usage in the region¹. Therefore, , the District would suggest the 2017 RTP/SCS link the regional transportation electrification plan with renewable electricity generating from bioenergy facilities. As you are aware, Lake Tahoe's surrounding areas have abundant woody biomass materials from forest trimming and logging activities. These biomass wastes could potentially be fire hazards and need fuel reduction treatments. The common method to remove these biomass wastes is to be burned in the field. Increases in open pile burning put a burden on regional air quality. Using these biomass wastes as energy feedstock to generate electricity can be an alternative for avoiding open pile burning as well as substituting fossil fuel usage. The bioenergy facility proposed by Placer County at Cabin Creek could provide a unique opportunity to the regional transportation electrification plan, to achieve not only reduction of transportation fossil fuel usage, but also further clean energy applications from renewable sources.

Thank you for the opportunity to review the draft 2017 RTP/SCS. If you have any questions regarding this feedback, please contact Mr. Yushuo Chang of my staff at ychang@placer.ca.gov, or by phone at (530) 745-2325.

Sincerely,



Erik C. White
Air Pollution Control Officer

¹ 2012 Regional Plan Goal AQ-1 and E-1 for Air Quality and Energy Element

Hi Mr. Morrison,

Thank you for your comment on the Draft 2017 Regional Transportation Plan. I have attached our correspondence from last year when you submitted a similar comment during the public comment period for the 2016 Active Transportation Plan. There have been no changes to this geographic area since that time. Please review our earlier correspondence and if there is more you would like to discuss, please let me know.

Thanks for your interest and staying involved in transportation at Lake Tahoe,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: Ric Morrison [<mailto:ricmorrison@comcast.net>]
Sent: Saturday, February 25, 2017 11:50 AM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Comment on 2017 TRPA Transportation Plan

Mr Beryl:

You have asked for comments on the 2017 TRPA Transportation Plan. One of my main concerns is the bike trails at the lake.

I fully understand the needs and benefits of having bike trails around the lake. However, I am strongly opposed to routing these bike trails through residential areas specifically in Rubicon Park Estates on Rubicon, King George and Sierra Drives. Bringing extra people into the areas of our homes will bring excess traffic congestion, noise and garbage that we don't want. I understand it is less expensive to route the trails onto our streets, but I would hope you understand we would prefer these trails be designed to operate outside of our residential areas.

Thank you for listening.

Ric Morrison
8787 King George Drive
Rubicon Bay, CA

Sent from Ric Morrison's iPad

Hi Scott:

I believe you are referencing the 2016 Active Transportation Plan, which was approved in March 2016. Currently, the Draft 2017 Regional Transportation Plan is open for public comment. You can find the Draft 2017 Regional Transportation Plan here: <http://www.trpa.org/regional-plan/regional-transportation-plan/>

However, we appreciate your support of this trail project and will include it in our public record.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]
Sent: Wednesday, March 08, 2017 1:10 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Scott Brown <hebrownbul@gmail.com>
Subject: [your-subject]

Message Body:

Figure 4-10 shows a proposed path from the end of Oakland Ave to the bike path behind Meeks. I want to voice my very strong support for this short section of trail. Visitors and residents should have non-motorized access from the AI Tahoe neighborhood to the bike path system without having to approach the noise, pollution, and stress of US-50 traffic. The user bridge that used to be at the end of Oakland was heavily used and added to the quality of life living in AI Tahoe and made bike commuting less stressful. Please restore that trail connectivity.

Scott

--

This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)

Hi Mr. Shane:

Thank you for your comments on the Draft 2017 Regional Transportation Plan. I've addressed your comments and questions below. Please feel free to get back in touch with any additional comments or questions.

1. Cut through traffic in Kings Beach: The Kings Beach Commercial Core Project included many traffic calming measures to discourage cut through traffic and slow vehicles down when they do use neighborhood roads. I recommend you make contact with Peter Kraatz at Placer County to discuss what you are experiencing on your streets and brainstorm solutions together. I've cc'd Peter here - his email is pkraatz@placer.ca.gov.

2. Improved transit service: Through the implementation of this plan we expect to realize increased transit services that include free-to-the-user transit, expanded season and evening services, and increased frequency from 60 to 30 minutes on main routes.

3. The North shore water taxi service: This project is located on our unconstrained (no foreseeable revenue to implement at this time) project list. The estimated cost includes all aspects of operation, maintenance, and capital. This is a high level estimate. As the plan is implemented, and people more routinely leave their cars at home or at hotels, we expect that in conjunction with the cross lake ferry, connected paths, and frequent and free-to-the-user transit, people will utilize the water taxi as a means of getting to various locations around the Lake.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [<mailto:trpa@trpa.org>]
Sent: Friday, February 24, 2017 10:18 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Scott Shane <muttlemer@yahoo.com>
Subject: [your-subject]

Message Body:

I am concerned about increasing neighborhood cut through traffic, particularly in Kings Beach. What can be done to mitigate this. Improved signage? Lease speed limits? It greatly affects our neighborhood peace and quality of life. Any improvement in public transport would be great, but it won't work unless it is frequent and easy and maybe even mandated for tourists. Also why does it cost so dam much to say set up a water taxi?? Really multi millions?? Will anyone really use it?

--



Mail

PO Box 5310
Stateline, NV 89449-5310

Location

128 Market Street
Stateline, NV 89449

Contact

Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 11, 2017
TO: Shay Navarro, South Lake Tahoe Recreation Facilities Joint Powers Authority Bicycle Advisory Committee
FROM: TRPA Staff
RE: Response to South Lake Tahoe Recreation Facilities Joint Powers Authority Bicycle Advisory Committee Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Mrs. Navarro:

Thank you for South Lake Tahoe Recreation Facilities Joint Powers Authority Bicycle Advisory Committee (BAC) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your comments on the draft plan and your partnership in delivering connected, safe, and professionally maintained shared-use paths at Lake Tahoe. We have responded to the BAC's comments and recommendations below.

1. **Edit Request:** Please change the name of the City of South Lake Tahoe Bicycle Advisory Committee on page IV to South Lake Tahoe Recreation Facilities Joint Powers Authority Bicycle Advisory Committee

Thank you for this edit. We have updated the document.

2. **Recommendation:** When describing trails, sidewalks, paths, and recreation access consider including terms like: *year-round, all seasons, 365 days a year, multi-season, etc.*

Thank you for this recommendation. We've looked over the plan and included the use of "year-round" in a few key places.

- Text added to page 1-27, which reads: "The active transportation system must serve different comfort levels, be accessible year-round, and enhance safety and availability of crosswalks."
- Bullet added to page 3-15 which reads: "Providing year-round access through snow-removal, annual maintenance, and detours during construction."

Additionally, the plan also already discusses the importance of year-round maintenance on active transportation facilities on pages 3-17, and 3-35.

3. **Recommendation:** Consider adding "year-round" to Goal 2: Connectivity

Thank you for this recommendation. At this time we believe the language within the connectivity goal, particularly the use of the word "sustain" addresses this need.

We did add the following language into the description of the goal: “Increasing interconnections within and across modes, by closing gaps on paths, providing year-round access, and aligning transit schedules with transfers, encourages people to shift out of using their cars and into taking transit, bicycling, and walking.”

We very much appreciate the need for year-round accessibility on our active transportation network and are working closely with our local jurisdictions to support delivery of snow-removal on shared-use paths and sidewalks. Of special note is our partnership that supplies the equipment and monitoring protocol necessary for year-round monitoring of active transportation facilities.

4. Recommendation: Additional locations for transit stops, specifically at Luther Pass, Mt. Rose, and TRTA trailheads.

Thank you for this recommendation, which aligns with the Tahoe Backcountry Alliance and the Tahoe Rim Trail Association comments. We have updated the document in the following ways to address this recommendation:

- Page 3-7 has been updated with the following text: “Though some transit stops are located at recreation destinations, upgrades to transit service and facilities to recreation sites, including connections to the Tahoe Rim Trail can be improved.”
- Page 1-22: “This corridor is also a winter recreation corridor, including access to Mt. Rose, however access and transit service to this area can be improved.”
- Page 1-25: “This corridor is also a major winter recreation corridor, including access to Luther Pass, Freel peak, and Big Meadows, however access and transit service to these areas can be improved.”
- Page 1-26: “This corridor is also a major winter recreation corridor, including access to Jake’s Peak and Mt. Tallac, however access and transit service to these areas can be improved.”

5. Request: Information and Access to Data

Please see Appendix D for our most up to date information on the data we used for our Lake Tahoe Transportation Model. You may also be interested in the [2014 Transportation Monitoring Report](#). Also, please review our new website www.ltinfo.org. This website will act as our data and information clearinghouse and is in the process of being updated with more transportation information which will be delivered over the next year.

TRPA appreciates the BAC’s comments, partnership, and support for the 2017 Regional Transportation Plan and looks forward to our continued partnership.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

**Bicycle Advisory Committee (BAC), of the
South Lake Tahoe Recreation Facilities
Joint Powers Authority (JPA)**

Advisory Committee members:

David Reichel, Peter Fink, Bruce Eisner,
Russ Dahler, Chuck Nelson, Shay Navarro, Paul Amato



Dear Morgan Beryl, TRPA Transportation Planner

Please accept this letter on behalf of the Bicycle Advisory Committee of the JPA for Measures S/R.

We are generally impressed with the Draft Regional Transportation Plan (RTP) and encourage it timely adoption. It is important that potential delays in adoption do not imperil funding for imminent projects.

We have the following recommendations we ask to be considered:

Please change the name of the City of South Lake Tahoe Bicycle Advisory Committee on page IV to South Lake Tahoe Recreation Facilities Joint Powers Authority Bicycle Advisory Committee as our jurisdiction includes the unincorporated portion of El Dorado County in addition to the City of South Lake Tahoe.

When describing trails, sidewalks, paths, and recreation access consider including terms like: *year round, all seasons, 365 days a year, multi-season, etc.* In the last few years the BAC has played a role in clearing Class 1 bike paths in South Lake Tahoe and in Meyers. This has notably increased the utility of these resources. If the transportation system is going to support more active types of use, these resources need to be usable all year, and this should be called out in planning documents.

Consider adding “year round” to Goal 2: Connectivity p. ES-7

In Transit Section P ES-5, there are additional spots that need transit: Luther Pass, Mt. Rose, and TRT trailheads.

Is it possible to include an appendix showing the source data for user numbers? Data sharing and transparency is a nice idea and this data might be useful in future planning efforts.

Thank you for your work to develop the Draft RTP. It is appreciated.

Sincerely,
The South Lake Tahoe JPA Bicycle Advisory Committee



Mail

PO Box 5310
Stateline, NV 89449-5310

Location

128 Market Street
Stateline, NV 89449

Contact

Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 11, 2017
TO: Steve Teshara, South Shore Transportation Management Association
FROM: TRPA Staff
RE: Response to South Shore Transportation Management Association's Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Mr. Teshara:

Thank you for the South Shore Transportation Management Association's comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciated the ability to meet with you and discuss your recommendations. We also appreciate your participation during the public comment period and your support of the 2017 Regional Transportation Plan. We have listed below the major recommendations you submitted at our meeting and our responses. You also submitted a variety technical corrections, not listed here, that we reviewed and in many cases incorporated.

1. Recommendation: Enhanced discussion of the North Lake Tahoe -Truckee Resort Triangle and other neighboring area projects that connect to and indirectly serve the Lake Tahoe Region.

Thank you for this recommendation. The following text has been added to Chapter 2, page 2-4:

"This plan also supports projects and programs in adjacent regions that directly connect or indirectly serve the Lake Tahoe Region. For example, the North Lake Tahoe-Truckee Resort Triangle includes two main entry points to Lake Tahoe and encompasses North Lake Tahoe, Squaw Valley/Alpine Meadows, Northstar, and the Town of Truckee. The joint coordination, planning and development of transit, trails, and adaptive traffic management are essential in this high-use recreation area. The Truckee North Tahoe Transportation Management Association (TNT/TMA) provides a forum for collaboration among the public and private sectors to improve mobility in the Resort Triangle and beyond, including connections to Reno/Sparks and the Truckee Meadows. Other adjacent communities and regions are collaborating to improve access to and from Lake Tahoe, along highway corridors and in the backcountry. Examples include Carson City's plan to construct a single-track trail that will connect users from Carson to the Tahoe Rim Trail near Spooner Summit, and Douglas County's Pony Express Trail intended to connect the Carson Valley with Lake Tahoe in an area near Kingsbury Grade. These projects will provide additional non-highway access to recreation and increase safety by providing separated active transportation options for access to Lake Tahoe from neighboring communities."

2. Recommendation: Add Highlight on Adaptive Roadway Management

Thank you for this recommendation. We added a new section to Chapter 6, page 6-5. This new addition has been captured below.

Adaptive Roadway Management at Lake Tahoe

Adaptive roadway management challenges implementing agencies to operate roadways in atypical ways. This keystone strategy of transportation systems management is an important tool for Lake Tahoe operators due to the inability or desire to expand roadway capacity within the Region. The combination of limited entry roadways and peak recreation travel makes delivering adaptive roadway management at the Lake Tahoe Region, similar to practices already operating in Tahoe City, vital as it can assist partners in better managing congestion, and encouraging people to walk, bike, and use transit. Locations where this is being considered at Lake Tahoe include U.S. Highway 50, SR 89, and SR 267

Examples of Adaptive Roadway Management Include:

- *Reversing travel lanes for one direction travel during intense peak periods and during evacuation procedures*
- *Prioritize emergency vehicles, buses, and high-occupancy vehicles by holding single occupancy vehicles and allowing others to pass first*
- *Providing transit only lanes during peak periods, or within two way left turn lanes*
- *Limiting vehicle access to high use recreation destinations*

3. Recommendation: Include transit oriented development within appropriate policies.

Thank you for this recommendation. We updated two policies. They now read:

Policy 1.1: Support mixed-use and transit oriented development that encourages walking, bicycling, and easy access to existing and planned transit stops.

Policy 5.1: Encourage community revitalization and transit oriented development projects that comprehensively support regional and local transportation, housing, land use, environment, and other goals

4. Recommendation: Move the AI Tahoe Safety and Mobility Enhancement Project from the Active Transportation category to Corridor Revitalization category within the constrained project list, Appendix B.

Thank you for this recommendation. We discussed the change with the City of South Lake Tahoe and they agreed to this change. The EIP Project Tracker and Appendix B have been revised accordingly.

5. Recommendation: Make graphics within Appendix B more readable.

Thank you for this recommendation. We updated Appendix B and enlarged the graphics.

6. Recommendation: Move Appendix A to the front of the plan and within the body of the Regional Transportation Plan.

The transportation team discussed this change, however decided not to amend the plan as suggested. We believe by integrating the policies throughout the plan in association with discussion that is pertinent to each policy brings relevancy to each individual policy. Additionally, providing the Goals and Policies in one document is beneficial to its inclusion as the Transportation Element of the Lake Tahoe Regional Plan. As we begin planning for the 2021 Regional Transportation Plan, we will look at this suggestion again to determine its appropriateness at that time.

TRPA appreciates the South Shore Transportation Management Association's comments and in depth read of the draft 2017 Regional Transportation Plan. We also appreciate your support in delivering this plan and are looking forward to working with you and your members on moving projects forward, and updating our transportation demand management programs.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

Hi Mr. Haase:

Thank you for your comments on the Draft 2017 Regional Transportation Plan. I've addressed your comments below. Please feel free to get back in touch with any additional comments or questions.

1. Parking Centers: We are glad you support our Long-Term Vision of strategically placed in region and mega-regional mobility hubs (park and ride lots that include other amenities such as recreational equipment rental, bicycle facilities, etc). We will continue to convene partners to encourage getting this type of infrastructure, recreation amenities (at parking lots and on buses as you suggest) and transportation demand management programs in place.

2. Tolls: The TRPA Governing Board is looking into a variety of funding options that can be used to support transportation services and programs and work as an incentive mechanism.

3. SR 89 roadway management & tunnel: We understand your concern and you bring up some good ideas.

As this plan is approved and partner agencies begin to delve more deeply into Corridor Plans, I recommend you stay involved in that public process to get these needs and ideas on the table. You can learn more about the Corridor Plans here: <http://www.linkingtahoe.com/corridor/>

If you aren't already, you should sign up for our e-newsletter to make sure you stay up to date on public input opportunities: https://visitor.constantcontact.com/manage/optin?v=001te_v6vSd9jsYSW4IAZIC-n5CjBSNhdnaIYBULRQ6mZZ0B6n5hkoxDWszaJ838joiOsT-kCsXPJS7rL-Nkvo8EkJ75EetIIZoCG5D42_nlwo%3D

The SR 89 Recreation Corridor is a priority for regional partners, and already has a project in the very early planning phases. You can read more about that project here: <https://eip.laketahoeinfo.org/Project/Summary/01.01.03.0036>. You may want to make contact with the U.S. Forest Service, Anjanette Hoefer, cc'd here. Her email is: ahoefer@fs.fed.us.

Caltrans operates this roadway, so of course they are also a key partner. Steve Nelson (cc'd) from Caltrans District 3 can put you in touch with the correct contact: steve.nelson@dot.ca.gov

4. Transit: Through the implementation of this plan enhanced transit services can be realized. These include free-to-the-user transit, increased frequency from 60 to 30 minutes on main routes, and expanded season and hours of service.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org

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

From: TRPA [mailto:trpa@trpa.org]

Sent: Saturday, February 25, 2017 1:49 PM

To: Morgan Beryl <mberyl@trpa.org>

Subject: Tahoe Regional Planning Agency — RTP Comment from Website"[your-subject]"

From: Stephan Haase <stephanhaase@gmail.com>

Subject: [your-subject]

Message Body:

Comments regarding the Regional Plan.

In basin traffic needs to be radically reduced.

I would support out of or near basin parking centers with developed infrastructure of rail, bus, and taxi that accommodates sporting equipment and excess baggage. In addition greatly improved bicycle access.

If a person elects to drive a private vehicle in basin they must purchase regional auto pass much like a toll used. tools may be electronically controlled with license readers and RF technology. Local full-time residents are provided annual passes.

This is toll concert is common scheme in Western Europe and very successful. i.e. Brenner Pass on the A8 between Innsbruck and Italy.

In addition. SR 89 between West and South shores has become in increasingly needed route requiring the elimination of routine weather related closures. This route is now a vital access point to the labor market, business, and affects life safety. Barton Memorial Hospital is the closest facility to west shore residents while at times it's possible Tahoe Forrest in Truckee could be excessively long especially in winter and the possible avalanches / ski traffic from Alpine / Squaw.

SR 89 through emerald bay should have an avalanche tunnel much similar to Alpen Countries. Apparently GasEx or other means of avalanche control are not practical.

Lastly the current bus system is very limited and discouraging to local residents outside the core route of SLT. A bus system that connects all communities within the Basin would greatly enhance users experiences. The limited route and hours are the primary reason I continue to drive and not use the mass transit. Mass Transit should be greatly enhanced and people appetite to use the transit system will be increased when presented choices like a road toll. Incentives like discounts etc do not incentivize the people. Access and wallets - that's it.

Please share these comments with the RTP members.

Thank you.

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This e-mail was sent from a contact form on Tahoe Regional Planning Agency — TRPA
(<http://www.trpa.org>)

**Mail**

PO Box 5310
Stateline, NV 89449-5310

Location

128 Market Street
Stateline, NV 89449

Contact

Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 10, 2017
TO: Friends of the West Shore and Tahoe Area Sierra Club
FROM: TRPA Staff
RE: Response to Friends of the West Shore and Tahoe Area Sierra Club Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Quashnick, Ms. Ames, and Ms. Gearhart:

Thank you for Friends for the West Shore (FOWS) and Tahoe Area Sierra Club's (TASC) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We have responded to FOWS and TASC specific comments and recommendations below. Please also see Attachment A for the TRPA response to the League to Save Lake Tahoe's comments, which FOWS and TASC incorporated into their own comments.

1. Recommendation: "No Net VMT" Policy.

FOWS and TASC support a "no net VMT" policy. The suggestion may have unintended consequences and may not yield the desired aim of reducing and managing traffic and congestion. Such a policy would likely stop most redevelopment projects needed to support the implementation of Area Plans and the TRPA Regional Plan. For example, the recently adopted Tahoe City Lodge project enthusiastically supported by the League as environmentally beneficial could not have been approved. Additionally, existing policies and codes are already shaping projects to use innovative solutions to reduce VMT, such as supplying visitors and residents transit passes and indoor bike parking as part of hotel stays or leases. The Tahoe City Lodge is a great example of this type of project that was designed using existing policies and codes. A "No net VMT" policy would also likely require extensive environmental review since slowing environmental redevelopment could potentially have environmental impacts beyond the VMT it is targeted to limit.

FOWS and TASC also suggest a policy that regulates **special events or prohibit temporary activities from increasing vehicle trips during peak periods**. While only local jurisdictions directly permit special events or temporary activities, TRPA regularly coordinates with local governments to require development of traffic plans for special events, as shown in Policy 4.9 which reads: "Require the development of traffic management plans for major temporary seasonal activities, including the coordination of simultaneously occurring events." Those plans routinely require event providers to provide shuttles, ample bicycle parking and other traffic management measures and incentives to manage congestion and encourage people to walk, bike, and use transit. The Tahoe Region is a resort destination and special events and temporary activities are woven into the fabric of its economy. An outright prohibition as suggested is inconsistent with the existing approved plans and land uses. The RTP addresses the concern by

emphasizing the growth of transit service and alternative means of travel to and from the Region rather than prohibiting certain types of events.

2. & 3. Recommendation: Environmental Document Analysis Adjustments:

Regarding your comments suggesting that the baseline traffic analysis include impacts from recently approved projects just outside the Region (Squaw Valley, Martis Valley West), post 2012 RPU Amendments, post-2014 (baseline year) traffic counts, and alleged land use changes regarding vacation home rentals. The IS/IEC traffic analysis includes changes to the transportation system and land use development patterns that have occurred, or are newly planned to occur, since adoption of the 2012 RTP as documented within Appendix D of the Draft RTP. After completion of the 2012 Regional Transportation Plan, TRPA initiated an update to the TransCAD model. The update applied 2010 Census demographic updates and incorporated data from a 2011 license plate survey. The data refinements better identified and responded to changing travel behavior in the Region. Notably, these refinements provided an updated accounting of several variables that serve as critical primary predictors of travel behavior for the TRPA model, including the overall percentage of full-time homeowners, secondary homeowners, commuters, and visitors to the Region at the seven Basin-entry locations. The data refinements for this model update also included use of the latest US Census demographic and socioeconomic data (US Census 2010), including: resident vs. seasonal homeownership, persons per occupied dwelling unit, household income, and employment.

Some comments suggest that the existing baseline is artificially low and that the transportation analysis did not account for potential increases in economic activity, the temporary effects of drought, or other changes in visitation that could increase future traffic into and through the Region since 2014. The IS/IEC is based on a 2014 baseline. Other environmental review guidelines (e.g. CEQA Guidelines Section 15125, Environmental Setting) and judicial guidance on the subject of baseline have determined that the baseline against which a project's impacts should be compared is generally existing conditions at the time the analysis commenced unless special circumstances warrant a modified baseline. Because the modeling process is extremely lengthy, TRPA began development of the Regional Transportation Plan model inputs in the summer of 2015. Since land use regulations and information regarding existing and available development rights is constantly being updated, running the model necessitates selecting a cutoff date and loading the model with the best available data as of that date, in this instance December 31, 2014. Therefore, the modeled land-use scenario included all regulations and in place as of December 31, 2014, and all data on existing and planned development in place up to December 31, 2014, with the documentation available by August 2015. The TRPA Governing Board acknowledged this cut-off date at their June 24, 2015 meeting, and at that time, the most up to date traffic count information published by Caltrans and NDOT were the 2014 Traffic Counts. The IS/IEC traffic analysis was conducted by using the 2014 base year, prepared using the 2012 RPU/RTP Model land use inputs (2010 base year) updated using the most up-to-date information and forecasting methodology, described above and within RTP Appendix D. Therefore, the traffic analysis conducted for this RTP IS/IEC represents a 2014 land use scenario produced with the best available traffic model configuration available at the time the model was run.

Appendix D of the RTP contains detailed descriptions of the methods used for estimating overnight visitation (hotel/motel occupancies) and seasonal and vacation home use. Estimates of day-use visitation and addition of external trips from development adjacent to TRPA boundaries are also described within Appendix D: "In order to account for this additional traffic growth, TRPA conducted a series of sensitivity analyses to better characterize the anticipated increase in day-use visitation and increase in projected traffic counts along the two corridors. Within the

modeling framework, day-use visitation was originally generated from the 2005 travel survey records and has since been updated with the 2010-2011 License Plate and Postcard Survey. External station cordon counts are then used to calibrate the day-use population size, which is then indexed to the overnight visitor population. Therefore, if the overnight visitor population increases, the day-use visitation component of the model increases accordingly. Another factor that affects the day use population in the model is increases in commercial center and recreational amenities (i.e. beach attractiveness and gaming). Each of these areas is assigned an attraction value, which influences the number of day visitors that are assumed to come to the Region each day. To reflect the potential growth along the two north entry-corridors, TRPA made slight adjustments to the hotel-motel occupancies as well as to beach attractiveness factors to influence greater day-use visitation from the two projects along the SR 89 and SR 267 corridors. The purpose of the analysis was intended to match the forecasted entry volumes forecasted in the Squaw and Martis Valley analyses to be commensurate with the forecasted model values. The comparison of TRPA modeled traffic entry volumes and the modeled entry volumes by adjacent metropolitan planning organizations is shown in Table D.17 within Appendix D. For additional information concerning how the Lake Tahoe Transportation Model generates day visitation, refer to the Lake Tahoe Resident and Visitor Model; Model Description and Final Results, August 2007.”

As described above, there are not special circumstances related to transportation modeling in the case of the IS/IEC that warrant a modified baseline. Thus, use of existing conditions as baseline is appropriate. Although traffic counts have increased slightly in the past few years, attempting to make a prediction on all the future factors that would influence population and travel behavior would be speculative. The future year traffic forecasts estimated by the TRPA travel demand model take into consideration reasonably expected growth in population, school enrollment, employment levels, and overnight and day use visitors due to release of new allocations, as presented in the Lake Tahoe Resident and Visitor Model Report (Parsons Brinckerhoff 2007).

Staff has analyzed the information suggested by FOWS/TASC and determines that none of it alters the conclusion that the proposed changes from the 2012 RTP to the 2017 RTP will not have an unmitigated significant adverse environmental impact.

4. Recommendation: Parking Management Strategies

FOWS and TASC suggest that the RTP should incorporate policies which do not allow for increases in parking spaces while incentivizing the removal of existing parking spaces.

The parking management policies in the 2017 RTP/SCS carry forward the 2012 RTP approach with enhancements to reflect contemporary best practices. Rather than pull back, the 2017 RTP/SCS policies further encourage innovative parking management strategies at Lake Tahoe. As Attachment B: Goals and Policies Crosswalk of the IS/ IEC illustrates, policies referring to parking management have been strengthened. Additions have been made for technology opportunities. Other amendments add parking management strategies to area plans. New policies added since 2012 emphasize the importance of parking management strategies in town centers, at high use recreation destinations, and along constrained corridors where shoulder parking is currently presenting safety and environmental issues. All of these changes provide much stronger grounds to implement more aggressive parking management strategies than the 2012 Plan.

There is no regionally suitable, one-size fits all maximum parking standard. The better avenue for implementation of the approach is through local government Area Plans and development of corridor plans tailored to the specific uses within each of the six regional corridors. The 2017

RTP/SCS policies support the implementation of dynamic, demand based pricing. Nonetheless paid parking must be implemented and operated by an entity with ownership of the property or through agreements with property owners. TRPA does not have minimum or maximum parking standards. Parking standards are set only by local jurisdictions through area plans and local codes. Existing TRPA policies and code require local jurisdictions to analyze parking and include parking measures to encourage walking, biking, and transit development of area plans.

Overall, the Tahoe Region is seeing progress in this area. Parking studies focused on shared parking and pricing elasticities have been conducted in Placer and Washoe Counties. The Placer Area Plan has newly adopted progressive parking management strategies within it's policies and in proposed projects within the draft 2017 RTP/SCS. As an example, the Tahoe Transportation District in partnership with Washoe County, NV State Lands, and others are building off highway parking amenities within the SR 28 corridor including fees for off street parking while restricting highway shoulder parking and incorporating real-time technology to provide parking availability information to users before they choose to drive to destinations. TRPA will continue to develop these and other aggressive parking management solutions with our partners.

5. Recommendation: Funding and Adaptive Roadway Management

Thank you for your comments regarding support for regional funding mechanisms and adaptive roadway management. A bi-state funding workgroup will be forming that will look at all possible funding mechanisms to support priority transportation projects that could also act as an incentive system. Adaptive Roadway Management projects are already under discussion with many of the appropriate lead and operating agencies. As projects further develop, TRPA will support their accelerated delivery as appropriate.

TRPA appreciates the FOWS and TASC comments on the draft 2017 Regional Transportation Plan and look forward to your continued participation.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

DATE: April 10, 2017
TO: The League to Save Lake Tahoe: Shannon Eckmeyer, Esq. and Marissa Fox, Esq.
FROM: TRPA Staff
RE: Response to League to Save Lake Tahoe Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Eckmeyer and Ms. Fox:

Thank you for the League to Save Lake Tahoe's (The League) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your recognition of the forward-thinking concepts within the plan and that it represents tangible progress for the Tahoe Region. We have responded to each of your comments, questions, and recommendations below.

CATEGORY: Bolstering RTP policies and including additional solutions will contribute to the success of this Plan.

1. League Recommendation: The RTP should incorporate more aggressive parking management strategies similar to those included in the 2012 RTP.

The parking management policies in the 2017 RTP/SCS carry forward the 2012 RTP approach with enhancements to reflect contemporary best practices. Rather than pull back, the 2017 RTP/SCS policies further encourage innovative parking management strategies at Lake Tahoe. As Attachment A: Goals and Policies Crosswalk of the IS/ IEC illustrates, policies referring to parking management have been strengthened. Additions have been made for technology opportunities. Other amendments add parking management strategies to area plans. New policies added since 2012 emphasize the importance of parking management strategies in town centers, at high use recreation destinations, and along constrained corridors where shoulder parking is currently presenting safety and environmental issues. All of these changes provide much stronger grounds to implement more aggressive parking management strategies than the 2012 Plan.

In your letter, you reference the TRIA tool and state the analysis "omitted assumed reduction in minimum parking requirements." As you will see Appendix D of the Draft 2017 RTP/SCS pages D-30 through D-31 as well as table D-19 parking management strategies implementation is included as a reduction consistent with the 2012 RTP analysis.

Under this item the League also suggests adopting two additional policies regarding parking management, they are:

- **The RTP should eliminate minimum parking requirements and impose maximum parking requirements.**
- **The RTP should implement dynamic, demand-based parking pricing.**

Thank you for the suggestions. While each policy on its face appears workable, neither is well suited to the RTP. But other included policies can be relied upon to accomplish the same result.

- First, there is no regionally suitable, one-size fits all maximum parking standard. The better avenue for implementation of the approach is thru local government Area Plans.
- TRPA does not have minimum or maximum parking standards. Parking standards are set only by local jurisdictions through area plans and local codes. Existing TRPA policies and code require local jurisdictions to analyze parking and include parking measures to encourage walking, biking, and transit development of area plans.
- The 2017 RTP/SCS policies support the implementation of dynamic, demand based pricing. Nonetheless paid parking must be implemented and operated by an entity with ownership of the property or through agreements with property owners. TRPA does not have authority to require or collect fees for paid parking but local governments and land managers do. TRPA is working closely with many public land managers, the Tahoe Transportation District, and local jurisdictions to identify locations where dynamic, demand-based parking is appropriate. We agree demand-based paid parking can be a tool to help generate necessary funds to support transportation improvements and provide the incentive / disincentive system to encourage transit or disperse people's destinations during peak periods.

Overall, the Tahoe Region is seeing progress in this area. Parking studies focused on shared parking and pricing elasticities have been conducted in Placer and Washoe Counties. The Placer Area Plan has newly adopted progressive parking management strategies within it's policies and in proposed projects within the draft 2017 RTP/SCS. As an example, the Tahoe Transportation District in partnership with Washoe County, NV State Lands, and others are building off highway parking amenities within the SR 28 corridor including fees for off street parking while restricting highway shoulder parking and incorporating real-time technology to provide parking availability information to users before they choose to drive to destinations. TRPA will continue to develop these and other aggressive parking management solutions with our partners.

2. League Recommendation: Private investment in transit is essential to implementing sustainable transportation solutions.

TRPA wholeheartedly agrees with this assertion and supports public private partnership whenever possible. The League's letter discusses the Employer-Based Trip Reduction program. TRPA's program, first established in 1992 is incorporated into the code and is badly in need of an update to reflect more current feasible transportation demand management methods that use innovative technology and are supported by strong partnerships with the private sector, non-profits, advocacy groups, and local jurisdictions. As we discussed at our February 10, 2017 meeting, TRPA encourages the League to take an active role in the update of these programs and possibly TRPA code modifications to reflect best practices.

3. League Request for Information: The League supports transportation pilot projects and requests further information on the Emerald Bay Pilot Project.

The League's support of pilot projects is noted. Phasing project delivery lends success to many projects as it allows implementers to be adaptive as challenges arise and solutions are delivered. The referenced project is the "SR 89 Recreation Corridor Improvement Project," EIP project

number 01.01.03.0036 and is in the early stages of planning and funding solicitation. As shown in the EIP Tracker and in Appendix B of the Plan, the SR 89 Recreation Corridor Improvement Project is on the 2017 RTP/SCS constrained list under the Corridor Revitalization category and is estimated to cost \$5 million dollars, which includes all phases of planning and implementation. Expected performance measures include miles of roads decommissioned or retrofitted, pounds of air pollutants removed or avoided by project, and tons of greenhouse gases reduced. As you are aware, this project is included in a recent appropriation request the League supported under the 2016 Lake Tahoe Restoration Act.

Planning is already underway. In the fall of 2016, with support from the TRPA Governing Board EIP Committee, TRPA proposed the pilot project along the SR 89 Recreation Corridor. Staff immediately began coordinating with the U.S. Forest Service to outline options to include in the project that would prioritize and increase transit access, manage parking, and implement adaptive roadway management tools. We encourage the League to lend support to the U.S. Forest Service, as the lead agency for the planning of this project.

4. League Recommendation: Vacation home rentals undermine the RPU and RTP and must be regulated by the TRPA.

The League recommends adding “all overnight uses” to Policy 1.6. The draft policy already incorporates all major commercial interests. TRPA is involved in a number of housing forums. We anticipate public discussion on the concerns of residential building allocations and possible land use policies. TRPA and partners will be working with all major commercial interests that manage vacation home rentals through transportation demand management programs focused on encouraging active transportation and transit as a means for getting around Tahoe.

5. League Recommendation: Clarification and information needed on transit infrastructure and roadway structures.

Under this item the Leagues suggests the following:

- **Transit infrastructure should prioritize transit lanes before or alongside transit signal priority. There should also be clarification on regional signal timing.**

The draft 2017 RTP/SCS includes three projects that will work in tandem to deliver a more efficient operated roadway system for U.S. Highway 50 on the South shore of Lake Tahoe. These projects, though listed individually may be delivered as one bundled project, or may be delivered in phases. These include:

- A. Constrained List: EIP Project Number 03.01.02.0106: Transit Signal Priority Along South Shore
- B. Constrained List: EIP Project Number 03.01.02.0078: California Multi-Modal Signal Control Optimization
- C. Unconstrained List: EIP Project Number 03.01.02.0133: Adaptive Traffic Management on U.S. Highway 50

As noted in the draft plan, TRPA works with implementing agencies to bundle projects as much as possible to decrease impact on roadway users, reduce costs and duplication of work, and deliver more comprehensive projects. There are times when lead agencies need to phase implementation to continue incremental progress as quickly as possible. Through discussions with Caltrans and transit operators, signal-preemption is a necessary and easier first step in

prioritizing transit at Lake Tahoe. That being said, TRPA is already working with partners on applying for funding that could bundle all three of the projects listed above into one study to assess best practice tools, cost / benefit, and recommendations for implementation.

The League's letter also comments on existing signal timing and coordination along the South Shore. Please see the attached Caltrans map of existing signal coordination (Attachment B).

The League also suggests **“Clarification is needed on currently approved and soon-to-be reviewed roadway projects as they will actually increase capacity for private automobile use (and likely VMT).”**

Both the U.S 50 Community Revitalization Project and the SR 89 Fanny Bridge Community Revitalization Project are EIP projects design to deliver multiple benefits. Each is targeted to reduce congestion at known chokepoints, increase safety and attractiveness for walking, biking, and using transit, improve flow for goods movement, and support economic vitality by creating a community-friendly main street. Coupled with the limited amount of proposed new roadway, both projects also reduce speeds and provide traffic calming that limit capacity in the existing roadway sections that are circumvented. The EIS for the Fanny Bridge project analyzed and accounted for VMT. The soon to be released U.S. 50 Project EIS will also analyze VMT impacts.

Under this item the League also requests **“Additional information is needed on Lake Tahoe specific traffic design volume.”**

Implementing agencies, such as Caltrans, NDOT, and local jurisdictions often use state standards or peak of the peak traffic volumes to assess and design roadway improvement projects, such as the size and number of lanes within a roundabout. It can be difficult to apply Tahoe relevant design volumes for this analysis, because no “Tahoe specific” design volume has been established. To date, design volumes must be reduced project-by-project to continue to encourage projects that meet goals and policies to manage congestion, prioritize transit, and increase safety and access for bicyclists and pedestrians. TRPA is already working with both state DOTs on recognizing Tahoe appropriate design volume standards for the Region, rather than addressing it project by project. We welcome The League's support of this effort.

6. League Recommendation: Additional suggestions to RTP Goals and technical corrections.

The League suggests that the VMT and greenhouse gas reduction targets are weakened from 2020 to 2035. This is inaccurate. The targets set by the California Air Resources Board (CARB) reflect the assumption of visitation and population growth, and associated VMT. TRPA is currently working with CARB to reevaluate the GHG reduction targets applicable to for the 2021 RTP/SCS, to respond to more stringent CA statewide GHG reduction goals recently enacted. Additionally, the League states that “there is no clarification as to why the emissions are actually increasing...” This is inaccurate. All of the assumptions and explanations of those assumptions are in Appendix D.

The League also suggests that storm drains are not consistently maintained on a regional level. Maintaining storm drains and reducing stormwater runoff is the responsibility of local jurisdictions and roadway operators such as the State departments of transportation under both TMDL regulatory requirements and Public Works budgets. All entities are working diligently to comply with stormwater management to meet TMDL requirements, including storm drain

maintenance. The 2017 RTP/SCS emphasizes the importance of roadway and water quality infrastructure maintenance. In the draft 2017 RTP/SCS, five percent of foreseeable revenue is planned specially for roadway water quality projects. Additionally, many corridor revitalization and active transportation projects include improvements to stormwater management.

The League reiterates previous comments to consider adding the words “restore” to Goal 1, and “sustainable” to Goal 4. TRPA staff appreciates the feedback but does feel these items are covered. The intent of the first goal is clear using the existing proposed language, “protect and enhance.” Goal 4 focuses on the importance of coordinated operations and congestion management which support sustainability. Sustainability is covered all through the 2017 RTP/SCS and provides the foundation of the plan and each Goal.

CATEGORY: Effective oversight and ongoing coordination among local jurisdictions and agencies is essential to the RTP’s success. Implementation of the RTP relies on information referenced in currently unavailable TTD plans.

In the multi-layered work of transportation planning, the relationship between the RTP, which is a general policy framework plan, and much more detailed later implementation plans, such as corridor plans, can be confusing. The RTP does not “rely” on information from the Corridor Plans. The RTP policies guide the development of further details in modal plans, corridor plans, area plans, and project specific studies. The cascade of plans moves from the general to very specific at the project design level. TRPA works closely with the Region’s transit operators and local jurisdictions while developing area-specific implementation plans and projects. The information located in the draft 2017 RTP/SCS combines all known inputs and is the most up-to-date information available. The RTP is at the top of the planning hierarchy and uses goals, policies, and priorities to guide what other plans and projects must address. The RTP prioritizes free-to-the-user transit, increased transit frequency and expanded season and hours of operation, increased transit access to recreation destinations and neighborhoods, closing gaps on shared-use paths for active transportation, and technology to provide real-time information and incentivize behavior change that disperse when, where, and how people travel. The specifics of how these priorities will be delivered are encompassed in the projects listed in the constrained and unconstrained project lists in Appendix B and further elaborated on the EIP Project Tracker.

1. League Recommendation: “No Net VMT” Policy suggestion & Uncertainty surrounding the status of both the VMT Threshold indicator and implementation of the RTP support an interim “no net VMT” policy

The League reiterates its desire for a “no net VMT” policy. The suggestion while attractive on its face may have unintended consequences and may not yield the desired aim of reducing and managing traffic and congestion. Such a policy would likely stop most redevelopment projects needed to support the implementation of Area Plans and the TRPA Regional Plan. For example, the recently adopted Tahoe City Lodge project enthusiastically supported by the League as environmentally beneficial could not have been approved. Additionally, existing policies and codes are already shaping projects to use innovative solutions to reduce VMT, such as supplying visitors and residents transit passes and indoor bike parking as part of hotel stays or leases. As you note, the Tahoe City Lodge is a great example of this type of project that was designed using existing policies and codes.

In the many meetings between TRPA and the League on VMT, the League has often advocated to use VMT as a water quality metric. This question is currently being addressed through the Transportation Measures Working Group in which the League is participating. The VMT

threshold indicator is established to assess nitrogen deposition into Lake Tahoe. The Working Group will consider possible transportation metrics to measure other factors of concerns such as congestion, water quality, air quality and more.

A “No net VMT” policy would also likely require extensive environmental review since slowing environmental redevelopment could potentially have environmental impacts beyond the VMT it is targeted to limit.

2. League Recommendation: Bay Area region should be included as part of the RTP as it is unknown if it will be incorporated into the TTD plans.

The Bay Area region’s connection to Lake Tahoe transportation is incorporated into the draft 2017 plan. The plan frequently underscores the major drive up market from the Northern California area and the need to work with mega-region partners to leverage funds, projects, and transportation demand management programs to encourage visitors to use transit or rail when visiting the Tahoe Region. As noted in the plan, this work is already underway. A coalition of mega-region partners is now established and TRPA expects the 2021 Regional Transportation Plan to include more clearly defined projects that will enhance inter-regional connections.

CATEGORY: Congestion Management Process is unknown creating uncertainty to RTP implementation.

Though the Congestion Management Process (CMP) is under development, it may not be appropriate to claim uncertainty is created for the RTP. The CMP is a requirement for urban MPO’s like TRPA and being new is not yet well understood by stakeholders. The CMP is a requirement to monitor and report on system and project level performance, and ensure that the direction of funds is allocated to projects that contribute the most to better managing congestion at Lake Tahoe. TRPA already monitors and reports on various transportation measures and awards transit funds based on system performance. In this respect, the CMP builds on the way TRPA has monitored transportation system performance for decades. As a first step TRPA convened the Transportation Measures Working Group to collaboratively review current measures to ensure the best measures are used to determine transportation system’s success. The League is actively participating in the Working Group. Additionally, TRPA is piloting its performance assessment tool with implementing agencies. Once finalized, the tool will be used to allocate transportation funds directly through a competitive grant process.

TRPA appreciates the League’s comments on the draft 2017 Regional Transportation Plan and looks forward to working together to improve transportation demand management programs, transportation measures, and plan projects that help the Region meet the 2017 RTP/SCS goals and policies.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

2017/2012 RTP POLICY CROSSWALK

2017 GOAL	2017 POLICY	2012 POLICY			JUSTIFICATION
ENVIRONMENT	Protect and enhance the environment, promote energy conservation, and reduce greenhouse gas emissions.				
	1.1 Support mixed-use and transit oriented development that encourages walking, bicycling, and easy access to existing and planned transit stops.	1.1 Support mixed-use that encourages walking, bicycling, and easy access to existing and planned transit stops in Centers.	4.2 Provide transit facilities that encourage transit, bicycle, and pedestrian usage.		4.2 was removed as the link between active transportation (bicycle and pedestrian) and transit facilities is included in policies of the Active Transportation Plan and is duplicative of 2012 Policy 1.1
	1.2 Leverage transportation projects to benefit multiple environmental thresholds through integration with the Environmental Improvement Program.	1.4 Develop and implement a Sustainable Communities Strategy (SCS) to meet TRPA thresholds and other statutory requirements.	1.5 Support sustainable transportation infrastructure and operational programs that provide environmental and community benefits.	13.2 Integrate transportation programs into the Environmental Improvement Program (EIP).	A Sustainable Communities Strategy is adopted in concert with the regional transportation plan, and threshold attainment is included in 2016 policy 1.2, therefore policy 2012 1.4 is not needed. 2016 policy 1.2 replaces 2012 policy 1.5 as sustainable transportation and infrastructure is a primary component of the regional transportation plan and explained in other chapters. 2016 policy 1.2 also replaces 13.2 in reference to the Environmental Improvement Program.
	1.3 Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses by prioritizing projects and programs that enhance non-automobile travel modes.	1.2 Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses.	1.3 Consider non-automobile travel modes when mitigating traffic-related project impacts.		2012 policies 1.2, 1.3, and 10.5 were combined into 2016 Policy 1.3 which addresses development impacts and mitigation -prioritizing those non-automobile mitigation programs
	1.4 Facilitate the use of electric and zero emission vehicles and fleets by supporting deployment of vehicle charging infrastructure within the Region, and supporting incentives and education of residents, businesses, and visitors related to the use of electric and zero emission vehicles.	4.4 Use alternative fuels to the maximum extent feasible in public transit fleets.	9.3 Encourage rental car providers to offer vehicles that are low- or zero-emission within the Tahoe Region.		2012 policy 4.4 is now included in 2016 policy 1.4. The alternative fuel policies were revised to focus on electric and zero emission vehicles. The language more broadly supports multiple types of incentive programs and vehicle types. This updated language also incorporates Placer county's comments during TAC member review.
	1.5 Require major employers of 100 employees or more to implement vehicle trip reduction programs.	9.1 Require major employers to implement vehicle trip reduction programs. Such programs could include: carpool and vanpool matching programs, employee shuttles, on-site secure bicycle storage and shower facilities, flexible work hours, and parking and transit use incentives.			The 2016 policy now clarifies that large employers are those with 100 or more employees as specified in the TRPA Code of Ordinances. Examples of incentive programs have been deleted for continued flexibility with best practice research. No changes to the code occurred from 2012 to 2016.
	1.6 Require new and encourage existing major commercial interests providing gaming, recreational activities, excursion services, condominiums, timeshares, hotels, and motels to participate in transportation demand programs and projects.	7.2 Require major commercial interests providing gaming, recreational activities, or excursion services to provide or participate in joint shuttle services or provide transit use incentives to their guests or patrons; and require connections with intermodal transportation facilities.	9.4 Require new, and encourage existing condominiums, timeshares, hotels, and motels to participate in public transit and/or private shuttle programs, and provide transit information and incentives to their guests and residents.		These policies were combined to eliminate redundancy.
	1.7 Coordinate with the City of South Lake Tahoe to update and maintain an Airport Master Plan and limit aviation facilities within the Tahoe Region to existing facilities.	12.2 Limit aviation facilities within the Tahoe Region to existing facilities.	12.1 Update and maintain an Airport Master Plan.		These policies were combined to eliminate redundancy and clarify roles and responsibilities.
	1.8 Strongly encourage traffic calming and noise reduction strategies when planning transportation improvements.				This policy was added to support environmental thresholds and to be consistent with Area Plan policies.
	1.9 Develop and implement a cooperative, continuous, and comprehensive Congestion Management Process to adaptively manage congestion within the Region's multi-modal transportation system.				This policy was added to be consistent with Area Plan policies and new FAST Act requirements designating the Tahoe Metropolitan Planning Organization as a Transportation Management Agency serving a population greater than 200,000 people.

2017/2012 RTP POLICY CROSSWALK

CONNECTIVITY		Enhance and sustain the connectivity and accessibility of the Tahoe transportation system, across and between modes, communities, and neighboring regions, for people and goods.			
	2.1 Coordinate with Federal, state, and local government as well as private sector partners to identify and secure adequate transit service funding that provides a viable transportation alternative to the private automobile for all categories of travelers in the Region.	5.2 Seek cooperation from neighboring jurisdictions to expand non-automobile transportation to cities, towns, and recreational areas outside of the Tahoe Region.			This policy was updated to formalize the need for the Region to coordinate on funding sources, expand the list of partners, and to be consistent with Area Plan policies.
	2.2 Provide frequent transit service to major summer and winter recreational areas.	4.3 Provide transit service to major summer and winter recreational areas.			This policy was modified to specify "frequent" transit service to clarify the need not only for access but frequent service to encourage increased ridership.
	2.3 Establish regional partnerships with surrounding metropolitan areas to expand transit to and from Lake Tahoe.	5.1 Participate in state and local transportation planning efforts to ensure coordination and consistency amongst various planning agencies inside and outside the Region.			This policy was updated to reflect current and future efforts to collaborate and plan with neighboring regions who's growth and transportation strategies impact the Tahoe Region.
	2.4 Improve the existing transit system for the user making it frequent, fun, and free in targeted locations. Consider and use increased frequency, preferential signal controls, priority travel lanes, expanded service areas, and extended service hours.	4.1 Improve existing transit systems through increased frequency, preferential signal controls, expanded service areas, and extended service hours.			This policy language was expanded to include the basic tenants desired for transit planning and provide flexibility for new and innovative approaches to improving the transit system.
	2.5 Integrate transit services across the Region. Develop and use unified fare payment systems, information portals, and shared transfers.				This policy was added to be consistent with Draft Corridor Connection Plan and Draft Long Range Transit Plan. This policy directs more efficient regional transit operations until free-to-the-users transit can be implemented.
	2.6 Consider waterborne transportation systems using best available technology to minimize air and water quality impacts in coordination with other modal options, as an alternative to automobile travel within the Region.	4.6 Consider waterborne transportation systems in coordination with other public and private transportation systems, including the pedestrian and bicycle network, using best available technology to minimize air and water quality impacts as an alternative to automobile travel within the Region.			This policy language was modified to clarify intermodal connectivity and public/private partnership needs when designing and implementing waterborne transportation.
	2.7 Provide specialized public transportation services for individuals with disabilities through subsidized fare programs for transit, taxi, demand response, and accessible van services.	11.1 Provide specialized public transportation services with subsidized fare programs for transit, taxi, demand response, and accessible van services.			This policy was clarified to include "individuals with disabilities" to be better reflect the type of services needed.
	2.8 Make transit and pedestrian facilities ADA-compliant and consistent with Coordinated Human Services Transportation Plans.	11.2 Ensure that transit and pedestrian facilities are ADA-compliant and consistent with the TMPO Coordinated Human Services Transportation Plan.			This policy was modified slightly to specify that the TMPO is not responsible for the Coordinated Human Services Transportation Plan, but continues to ensure consistency.
	2.9 Develop formal guidelines or standards for incorporating transit amenities in new development or redevelopment, as conditions of project approval.				This policy was added to increase transit oriented development and ensure consistency with Draft Corridor Connection Plan and Long Range Transit Plan.
	2.10 Provide public transit services at locations nearby school campuses.				This policy was added to encourage public/private partnerships, provide safe routes to schools and modified in response to comments from Placer County during TAC review to comply with California and FTA regulations.

2017/2012 RTP POLICY CROSSWALK

	2.11 Coordinate public and private transit service, where feasible, to reduce service costs and avoid service duplication.				This policy was added to encourage public/private partnerships, maximize funding opportunities, and for consistency with Area Plan policies.
Active Transportation	2.12 Develop and maintain an Active Transportation Plan as part of the regional transportation plan. Include policies, a project list of existing and proposed bicycle and pedestrian facilities, and strategies for implementation in the Active Transportation Plan.	2.1 Develop and maintain a Lake Tahoe Region Bicycle and Pedestrian Plan (Bicycle and Pedestrian Plan) as a component of the Regional Transportation Plan (RTP); and maintain a list of existing and proposed bicycle and pedestrian facilities and strategies for implementation within the Bicycle and Pedestrian Plan.			The policy was updated to reflect the new name of the Bicycle and Pedestrian Plan, now called the Active Transportation Plan. The Active Transportation Plan was updated and approved in March of 2016.
	2.13 Incorporate programs and policies of the active transportation plan into regional and local land use plans and regulatory processes.	2.6 Promote the incorporation of programs and policies of the Bicycle and Pedestrian Plan into Regional and local land use plans and regulatory processes.			This policy was revised to "incorporate" rather than "promote". The Bicycle and Pedestrian Plan is now the "Active Transportation Plan"
	2.14 Construct, upgrade, and maintain pedestrian and bicycle facilities consistent with the active transportation plan.	2.2 Construct, upgrade, and maintain pedestrian and bicycle facilities consistent with the Lake Tahoe Region Bicycle and Pedestrian Plan.	2.3 Prioritize constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed concurrently with other projects.		The Bicycle and Pedestrian Plan is now the "Active Transportation Plan". 2012 policy 2.3 was removed because this concept of prioritization in urbanized areas has been incorporated into project prioritization criteria for the ATP and RTP. Additionally, 2012 policy 2.3 was duplicative of 2016 policy 2.14.
Multi-Modal	2.15 Accommodate the needs of all categories of travelers by designing and operating roads for safe, comfortable, and efficient travel for roadway users of all ages and abilities, such as pedestrians, bicyclists, transit riders, motorists, commercial vehicles, and emergency vehicles.	10.2 Use transportation system management (TSM) measures to improve the existing transportation system, while maintaining provision of bicycle and pedestrian facilities. TSM measures could include: dedicated turn lanes, intersection improvements, bicycle-activated signals, and roundabouts. Additionally, work with State Departments of Transportation (DOT) and local transportation departments to improve signal synchronization.			This policy was updated to reflect the national complete street policy that forms the basis of the way projects should be designed, constructed, and operated throughout the Region. The updated policy is more broad and provides greater flexibility when designing projects.
	2.16 Encourage parking management programs that incentivize non-auto modes and discourage private auto-mobile use at peak times in peak locations, alleviate circulating vehicle trips associated with parking availability, and minimize parking requirements through the use of shared-parking facilities while potentially providing funding that benefits infrastructure and services for transit, pedestrians, and bicyclists.	8.1 Encourage shared and other parking management strategies.	8.2 Encourage parking management programs that provide incentives to fund improvements benefiting transit users, pedestrians, and bicyclists.	8.3 Encourage parking management strategies that are tailored to the needs of each specific location and promote pedestrian and transit use.	2012 policies 8.1, 8.2, and 8.3 addressing parking management have been consolidated in 2016 policy 2.16. Additionally, 2016 policy 2.16 is consistent with Area Plan policies.

2017/2012 RTP POLICY CROSSWALK

	2.17 Coordinate and include in area plans, where applicable, intermodal transportation facilities (“Mobility Hubs”) that serve centers and other major areas of activity while encouraging the consolidation of off-street parking within mixed-use areas.	7.1 Require that Area Plans identify intermodal transportation facilities to serve each Center, and other major activity centers. Intermodal transportation facilities should incorporate planned regional transportation facilities, parking, and connections between them (e.g., sidewalks, enclosed walkways, etc.) and should accommodate increased use of transit and non-motorized travel modes. Local agencies may need to coordinate with state Departments of Transportation when identifying intermodal facilities.			2012 policy 7.1 was modified for clarity, for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan, and to encourage the consolidation of parking consistent with Area Plan policies.
	2.18 In roadway improvements, construct, upgrade, and maintain active transportation and transit facilities along major travel routes. In constrained locations, all design options should be considered, including but not limited to restriping, roadway realignment, signalization, and purchase of right of way.	10.1 Incorporate transit stops and bicycle and pedestrian facilities in roadway improvement projects.	2.3 Prioritize constructing pedestrian and bicycle facilities in urbanized areas of the Region, facilities that increase connectivity of the pedestrian and bicycle network, and facilities that can be constructed concurrently with other projects.		These policies were updated for consistency with the 2016 Active Transportation Plan and to reduce duplication.
	2.19 Encourage jurisdiction partners to develop and plan coordinated wayfinding signage for awareness of alternative transportation modes including transit (TART/BlueGO), pedestrian, and bicycle facilities.	2.7 Implement safety awareness signage, road markings, educational programs, and programs that encourage bicycling and walking.			This policy was updated to promote the importance of including wayfinding signage into projects to encourage use of multi-modal options, to clarify implementation is the responsibility of partner local agencies and to include transit in addition to bicycling and walking. Additionally, this 2016 policy is consistent with Area Plan policies.
SAFETY Increase safety and security for all users of Tahoe's transportation system.					
	3.1 Coordinate the collection and analysis of safety data, identify areas of concern, and propose safety-related improvements that support state and federal safety programs and performance measures.				This policy was added for consistency with Draft Corridor Connection Plan, FHWA and State planning emphasis areas, State highway safety plans, and to increase safety for all users in the Tahoe Region.
	3.2 Consider safety data and use proven safety design countermeasures for safety hotspots recommended from roadway safety audits, the active transportation plan, corridor plans, and other reliable sources when designing new or modifying existing travel corridors.				This policy was added for consistency with Draft Corridor Connection Plan, FHWA and State planning emphasis areas, State highway safety plans, and to increase safety for all users in the Tahoe Region.
	3.3 Coordinate safety awareness programs that encourage law abiding behavior by all travelers.	2.7 Implement safety awareness signage, road markings, educational programs, and programs that encourage bicycling and walking.			This policy was revised to reflect the responsibility of the TRPA/TMPO as a regional coordination agency for overall safety programming, rather than an agency responsible for implementation of signage or road markings.
	3.4 Support emergency preparedness and response planning, including the development of regional evacuation plans, and encourage appropriate agencies to use traffic incident management performance measures.				This policy was added to reflect current state and federal planning requirements, and FHWA recommended innovations through the Everyday Counts Initiative.
	3.5 Design projects to maximize visibility at vehicular, bicycle, and pedestrian conflict points. Consider increased safety signage, site distance, and other design features, as appropriate.				This policy was added to increase safety for all users as a design element to projects and encourage design flexibility where appropriate per FHWA and California Department of Transportation recommendations.
OPERATIONS AND CONGESTION MANAGEMENT		Provide an efficient transportation network through coordinated operations, system management, technology, monitoring, and targeted investments.			

2017/2012 RTP POLICY CROSSWALK

	4.0 Prioritize regional and local investments that fulfill TRPA objectives in transit, active transportation, transportation demand management, and other programs and directly support identified TRPA transportation performance outcomes.				
	4.1 Identify opportunities to implement comprehensive transportation solutions that include technology, safety, and other supporting elements when developing infrastructure projects.				This policy was added to encourage comprehensive project planning and implementation, including the Tahoe Basin Intelligent Transportation System Strategic Plan's dig once policy.
	4.2 Collaborate with jurisdictions and DOT partners to develop adaptive management strategies for peak traffic periods at Basin entry/exit routes.				This policy was added to support the regional transportation project list, area plan policies, and encourage innovation in highway corridor operations.
	4.3 Promote awareness of travel options and conditions through advertising and real-time travel information.				This policy was added to support transportation demand management programs and encourage the spread of travel by time and mode type.
	4.4 Incorporate programs and policies of the Tahoe Basin Intelligent Transportation Systems Strategic Plan into regional and local land use plans and regulatory processes.	3.2 Implement measures consistent with the Federal Intelligent Transportation Systems (ITS) Program and the Tahoe Basin ITS Strategic Plan, including Traffic Management, Traveler Information Services, and Emergency Management Techniques.			The updated policy language clarifies and supports the incorporation of policies, programs and projects of the Tahoe Basin Intelligent Transportation Systems Strategic Plan into the Regional Transportation Plan.
	4.5 Support the use of emerging technologies, such as the development and use of mobile device applications, to navigate the active transportation network and facilitate ridesharing, efficient parking, transit use, and transportation network companies.	3.1 Implement electronic and automated payment systems for transit systems and paid parking areas, where appropriate.			This policy language was modified to more broadly support the use of emerging technologies for a variety of transportation related projects.
	4.6 Level of service (LOS) criteria for the Region's highway system and signalized intersections during peak periods shall be: "C" on rural recreational/scenic roads; "D" on rural developed area roads; "D" on urban developed area roads; "D" for signalized intersections. Level of Service "E" may be acceptable during peak periods in urban areas, but not to exceed four hours per day. These vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project-generated traffic in relation to overall traffic conditions on affected roadways.	10.7 Level of service (LOS) criteria for the Region's highway system and signalized intersections during peak periods shall be: <ul style="list-style-type: none">• Level of service "C" on rural recreational/ scenic roads.• Level of service "D" on rural developed area roads.• Level of service "D" on urban developed area roads.• Level of service "D" for signalized intersections.• Level of service "E" may be acceptable during peak periods in urban areas, not to exceed four hours per day.• These vehicle LOS standards may be exceeded when provisions for multimodal amenities and/ or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users at a level that is proportional to the project-generated traffic in relation to overall traffic conditions on affected roadways.	10.5 Consider quality of service for transit, pedestrians, and bicyclists in addition to motor vehicles when analyzing development impacts on the transportation system.		2012 policy 10.7 was not changed. Policy 10.5 was removed because it is duplicative of 2012 policy 10.7, is duplicative of existing ATP policies, and not an appropriate policy at the regional scale. Additionally, level and quality of service issues are being reviewed to reflect current state and nationwide best practices.

2017/2012 RTP POLICY CROSSWALK

	4.7 Regional transportation plan updates shall review projected travel into and within adopted area plans and effectiveness of mobility strategies.				This policy was added to ensure performance of Area Plans and inform the congestion management process.
	4.8 Prohibit the construction of roadways to freeway design standards in the Tahoe Region. Establish Tahoe specific traffic design volume for project development and analysis.	10.6 Prohibit the construction of roadways to freeway design standards in the Tahoe Region.			This policy was updated to include establishing traffic design volume standards for the Tahoe Region to support the prohibition of construction of Tahoe roadways to freeway design standards and establish a equitable and routine process during project design.
	4.9 Require the development of traffic management plans for major temporary seasonal activities, including the coordination of simultaneously occurring events.	9.2 Require the development of traffic management plans for major temporary activities that account for the coordination and timing of simultaneously occurring activities.			This policy was modified slightly to specify that major temporary activities are typically seasonal and to clarify overall policy intent.
	4.10 Actively support Transportation Management Associations (TMAs) in the Tahoe Region.	4.5 Actively support Transportation Management Associations (TMAs) in the Tahoe Region.			No change for this policy.
	4.11 Establish a uniform method of data collection for resident and visitor travel behavior.				This policy was added to coordinate with regional partners to create opportunities for trend analysis and for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan.
	4.12 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 (e.g. the Lake (www.laketahoeinfo.org) website).				Policy added for consistency current TMPO overall work program, to inform the congestion management process, and to ensure consistency with Area Plan policies.
	4.13 Establish regional and inter-regional cooperation and cost-sharing to obtain basin-wide data for transportation-related activities.				This policy was added to encourage the use and proliferation of innovative data collection methods, and for consistency with the Draft Corridor Connection Plan and Long Range Transit Plan.
	4.14 Design roadway corridors, including driveways, intersections, and scenic turnouts, to minimize impacts to regional traffic flow, transit, and bicycle and pedestrian facilities by using shared access points where feasible.	2.4 Design and site intersections and driveways, where feasible, to minimize impacts on public transportation, adjacent roadways and intersections, and bicycle and pedestrian facilities.	10.4 Reduce traffic conflicts by limiting or controlling turning movements from multiple parking lot access points onto major Regional travel routes and major local roadways; by designing and siting driveways to minimize impacts to Regional traffic flow, and by utilizing shared access points and shared driveways where feasible.	10.3 Preserve existing view turn-outs along scenic highways to maintain traffic flow and safety.	Policies 2.4, 10.3 and 10.4 were consolidated into 2016 policy 4.11 to reduce redundancy.
ECONOMIC VITALITY AND QUALITY OF LIFE Support the economic vitality of the Tahoe Region to enable a diverse workforce, sustainable environment, and quality experience for both residents and visitors.					
	5.1 Encourage community revitalization and transit oriented development projects that comprehensively support regional and local transportation, housing, land use, environment, and other goals.	6.2 Enhance the economic vitality of the Region by efficiently connecting people to jobs, goods, services, and other communities.	6.1 Develop and track measures of economic vitality related to transportation, (i.e., traffic and pedestrian counts, employment, hotel/motel occupancies, and other visitation trends) as part of the adaptive management system.		2012 policy 6.2 was removed because the concept of economic vitality is captured throughout the regional transportation plan and broadly incorporated into 2016 policy 5.1. 2012 Policy 6.1 was removed because we now have system-level performance measures for each goal in the plan as part of the congestion management process, which also includes project-level performance measures.

2017/2012 RTP POLICY CROSSWALK

	5.2 Provide multimodal access to recreation sites. Encourage collaboration between public lands managers, departments of transportation, transit providers, and other regional partners to improve year-round access to dispersed recreation activities. Strategies could include active transportation end-of-trip facilities, transit services, parking management programs, and incentives to use multi-modal transport.				This policy was added as it is the major theme of the 2016 regional transportation plan and responds to public input.
	5.3 Collaborate with local, state, regional, federal, and private partners to develop a regional revenue source to fund Lake Tahoe transportation and water quality projects.	6.3 Support public-private partnerships and business improvement districts when planning, financing, and implementing transportation and air quality programs and projects.	13.1 Collaborate with local, state, regional, federal, and private partners to develop dedicated funding and implementation programs for Lake Tahoe and the surrounding regions.		These policies were consolidated into 2016 policies 5.3 and 5.4 to reduce duplication.
	5.4 Collaborate with regional and inter-regional partners to establish efficient transportation connections within the Trans-Sierra Region including to and from Tahoe and surrounding metropolitan areas.	5.1 Participate in state and local transportation planning efforts to ensure coordination and consistency amongst various planning agencies inside and outside the Region.	5.3 Work with appropriate public entities, tribal governments, and private interest groups to ensure coordination and consistency.		These policies were consolidated into 2016 policies 5.3 and 5.4 to reduce duplication.
SYSTEM PRESERVATION Provide for the preservation of the existing transportation system through maintenance activities that support climate resiliency, water quality, and safety.					
	6.1 Preserve the condition of sidewalks and bicycle facilities and where feasible, maintain their year-round use.	2.5 Preserve the condition of sidewalks and bicycle facilities and where feasible, maintain their year-round use.			This policy has not changed.
	6.2 Maintain and preserve pavement condition to a level that supports the safety of the traveling public and protects water quality.				This policy was added to leverage environmental improvement projects in coordination with transportation projects, per FHWA requirements for asset management, and consistency with FHWA recommendation innovations through the Everyday Counts Initiative.
	6.3 Make “dig once” the basin-wide standard, requiring public and private roadway projects to accommodate the installation of conduit to support community needs. (e.g.: fiber optic, broadband, lighting, etc.)				This policy was added for consistency with the Tahoe Basin Intelligent Transportation Systems Strategic Plan and encourage the "dig once" philosophy into all projects.
	6.4 Consider the increased vulnerability and risk to transportation infrastructure from climate stressors, such as increased precipitation, flooding, and drought when designing new infrastructure and repairing or maintaining existing infrastructure.				This policy was added for consistency with state and federal guidelines.



Tahoe Regional Planning Agency
128 Market St.
Stateline, NV 89449

March 22, 2017

Re: Comments on the draft Regional Transportation Plan update and associated Initial Study/Initial Environmental Checklist (IS/IEC)

Dear Ms. Beryl:

The Friends of the West Shore (“FOWS”) and the Tahoe Area Sierra Club (“TASC”) thank you for the opportunity to provide comments on the draft 2017 Regional Transportation Plan (RTP) update, Initial Study/Initial Environmental Checklist (IS/IEC), and related documents. The RTP lays out a multi-pronged approach to address transportation issues in the Basin, identifying the 2012 RTP’s focus as improving transportation and reducing vehicle trips within Town Centers,¹ the 2017 RTP’s focus as addressing transportation within the Region, (e.g. from community centers to other community centers),² and the 2021 RTP’s focus as reducing regional transportation impacts (e.g. travel from Northern California and Nevada to and from the Basin).³

The 2017 RTP includes many positive measures and approaches that will be important in addressing Tahoe’s transportation impacts. The 2017 RTP also clearly explains the different approaches and management strategies spanning from *within* community centers, *among* centers, and travel to and from the Lake Tahoe Basin, all of which play an important role in Tahoe’s transportation system. New technology also provides promising options to further improve transportation planning. However, we have several concerns and recommendations regarding the RTP update and associated IS/IEC (detailed comments follow):

- The 2017 RTP includes no modifications to ensure existing traffic problems are not exacerbated;
- The 2017 RTP IS/IEC does not adequately consider the traffic increases associated with post-2012 RPU amendments, recently-approved projects adjacent to the Basin (e.g. Squaw Valley and Martis Valley area Specific Plans), conversions of single-family

¹ “The priorities of the 2012 Regional Transportation Plan began by creating walkable, bikeable community centers to better address Everyday Tahoe travel needs.” (RTP, p. ES-5)

² “Instead, the first need is the foundation of a seamlessly interconnected, well-functioning transportation system within the Region to assure travel options and easy movement once people arrive. The priorities of this 2017 plan’s transportation infrastructure, programs, and management activities will implement this foundation. They encourage the use of multi-modal options to increase the efficiency, capacity, and flexibility of what is fundamentally a fixed regional transportation system.” (RTP, p. ES-3)

³ “With a clearer understanding of the number and types of users and their travel needs and patterns, the time is ripe to raise and resolve the issue of regional funding so the Lake Tahoe Region is well-positioned in 2021 to chart a clear path to buildout of the transportation system that assures continued preservation of the environment, quality of life for residents, and a high-quality experience for the millions of people who travel to Lake Tahoe each year.” (RTP, p. ES-11)

homes to vacation rentals, capacity-expanding highway projects, and other existing conditions not addressed in the 2012 analysis;

- Vehicle impacts associated with entry/exit visitor traffic on public health and safety are not adequately discussed;
- Recent increases in traffic from visitors exiting the Basin on peak congestion days are not reflected by the 2014 baseline year (used as the existing conditions for the environmental analysis) and total traffic has increased.⁴ Recent increases also reflect a larger problem that has not been adequately addressed by the 2017 RTP wherein our transit systems are not keeping up with the increases in development and visitor growth;
- Aggressive measures and/or political efforts to pursue more effective measures to reduce visitor entry/exit traffic need to be pursued immediately and not delayed until 2021.⁵ Political efforts need to be initiated very soon as it will take time to garner political support for legal and regulatory changes for such measures (e.g. road toll/user fee). The 2017 RTP fails to discuss and require specific actions to achieve this goal;
- The RTP does not provide a plan to review successful measures in other areas or a plan to acquire adequate funding to cover transportation needs, although funding remains the biggest impediment to implementing an adequate transit network, and options to address the funding shortfalls are not adequately considered (e.g. road toll/user fee); and
- A list of potential local funding measures has not been provided to jump start local conversations about solutions to Tahoe's transit problems, despite the forty year gap since initial solutions were initially discussed in the mid-1970s.

To address these concerns, we recommend the following:

1. Adopt the “no new net VMT increase” concept proposed by the League to Save Lake Tahoe (this is not a building moratorium, but rather a requirement that future projects include adequate measures to avoid increasing VMT); in addition, we recommend that future special events or temporary activities be prohibited from increasing vehicle trips during peak periods;
2. Adjust the IS/IEC data to account for the potential increases in traffic from the following and adjust planning accordingly:
 - a. The Village at Squaw Valley and Martis Valley West Parcel Specific Plans;
 - b. Post-2012 RPU amendments;
 - c. Existing and future conversions of homes to vacation rentals which serve as additional de-facto Tourist Accommodation Unit (TAU) uses that are not addressed by the RPU’s cap on TAUs; and
 - d. Highway expansion projects that will result in additional VMT, including the State Route 89/Fanny Bridge Community Revitalization Project (Fanny Bridge Bypass) and the South Shore Community Revitalization Project (aka “the Loop Road”).

⁴ “Ms. Maloney said the traffic counts have started to trend upwards in the past three or four years.” (TRPA GB 2/22-2/23/2017, Minutes, p. 8)

⁵ “By first creating a seamless in-region transportation system, by the next update in 2021, partners can direct more action emphasis to providing effective travel options for visitors entering and existing the Region.” (RTP, p. 1-15)

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3. Although a quantitative assessment of existing conditions (as reflected by the traffic increases in 2015 and 2016, especially for visitors exiting the Basin) may not be possible due to the need to select a baseline year to represent the existing conditions for the environmental analysis, the RTP update and IS/IEC should include a discussion of recent traffic impacts and, at minimum, a qualitative comparison to the 2014 baseline data;
4. In addition to stronger parking management strategies to more effectively manage existing parking, the RTP should incorporate policies which do not allow for increases in parking spaces while incentivizing the removal of existing parking spaces; and
5. The RTP should include a robust discussion of more aggressive traffic-reducing and funding mechanisms, including a road toll/user fee (which would not only help reduce the funding shortfall for future transit needs, but also to discourage personal vehicle use) and a focused effort to utilize Adaptive Roadway Management (currently listed on the RTP's "unconstrained" list).

Detailed comments regarding these concerns and recommendations are attached. In addition, we hereby incorporate the 3/20/2017 comments submitted by the League to Save Lake Tahoe (LTSLT), including but not limited to concerns regarding the RTP's reliance on other documents which are not yet available for public release (e.g. the Long Range Public Transit Plan and Corridor Plans). We would be happy to meet to discuss these comments. Please contact Jennifer Quashnick at jqtahoe@sbcglobal.net or Laurel Ames at amesl@sbcglobal.net if you have any questions.

Sincerely,



Susan Gearhart,
President
Friends of the West Shore



Laurel Ames,
Conservation Chair
Tahoe Area Sierra Club



Jennifer Quashnick,
Conservation Consultant

Adopt a “no net VMT increase” amendment:

New projects:

As proposed by the LTSLT,⁶ we recommend TRPA immediately adopt a “no net VMT increase” policy so that existing transportation problems are not made worse in the immediate future while the agency leads efforts to examine better planning mechanisms (e.g. the Transportation Measures Working Group) and to implement the 2017 RTP policies (which include mitigating traffic impacts from new, expanded, or revised developments or land uses⁷). The proposed amendment would not be a moratorium on new development; rather, it would require future projects and plans to include adequate measures and project adjustments to ensure additional traffic impacts are not generated through measures which may include:

- Parking fees paid by business owners and/or developers that are used to support transit (which may involve business owners charging their customers for parking to collect such fees);
- Transit subsidies;
- 1:2 offsets for new parking spaces; and
- Incentives for passengers using Lyft, Uber, taxis, shuttles, etc.

As the RTP tiers from the 2012 Regional Plan Update (RPU), we recognize that certain recommendations may require associated RPU amendments.

New events and temporary activities:

Events which draw a substantial number of new vehicles during peak periods have been approved in recent years, further exacerbating roadway conditions during times that traffic congestion is already a problem (i.e. Snowglobe in the City of South Lake Tahoe over the New Year’s Eve Holiday).⁸ Increases in vehicle trips during peak periods associated with events and other potential temporary activities should be prohibited unless and until a comprehensive and effective transit system which reduces vehicle use by visitors entering and exiting the Tahoe Basin is successfully implemented. As noted for new projects, this is not suggesting that new events be denied, but rather that strong measures are included to prevent increased peak vehicle trips. Additional measures to reduce peak trip generation should also be employed for events that have already been approved and create or contribute to peak roadway congestion, such as the Snowglobe festival⁹ and Annual Celebrity Golf Tournament at Edgewood Golf course.¹⁰

⁶ Concept proposed in 12/12/2016 written comments on 2015 Threshold Evaluation Report and reiterated by Shannon Eckmeyer, Esq., during the 3/8/2017 APC hearing.

⁷ “Policy 1.3: Mitigate the regional and cumulative traffic impacts of new, expanded, or revised developments or land uses by prioritizing projects and programs that enhance non-automobile travel modes.” (RTP, p. 2-3)

⁸ “Although an estimated 10 million cars enter the Region annually, congestion is not always the result. Peaks in travel are experienced at specific locations during holiday weekends, for special events, and on high snowfall days.” (RTP, p. 3-4) [Emphasis added]

⁹ <http://snowglobemusicfestival.com/>

¹⁰ <https://americancenturychampionship.com/tournament-information/schedule-of-events/>

We recommend TRPA immediately consider and approve the proposed “No net VMT increase” policy for projects, and that it be applied to redevelopment and conversions of uses that increase vehicle use in addition to all new development. We also recommend TRPA adopt similar requirements which prohibit increased vehicle trips during peak periods associated with new and/or expanded future events and temporary activities.

Revisions and new information requiring analysis:

RPU Amendments:

Amendments to the RPU (including Area Plan approvals) have resulted in land use changes that are likely to increase traffic compared to existing conditions. For example:

- The environmental review performed for the January 2015 TRPA Code amendment to allow conversions of Commercial Floor Area (CFA) to Tourist Accommodation Units (TAUs)¹¹ did not adequately address the net regional increased vehicle trips that may result;
- The Placer County Tahoe Basin Area Plan¹² adopted in January 2017 allows for additional conversions of TAUs in Placer County without having accounted for the *local* impacts of additional TAUs and TAU morphing¹³ (the final EIR’s response to comments does not address this specific issue¹⁴);
- Regulations allowing TAU “morphing” continue to allow for net increases in vehicle trips that have not been accounted for in environmental impact analyses;¹⁵ and
- A significant number of large single family homes have been or are being converted/used as vacation rentals without being counted under TRPA’s cap on Tourist Accommodation Units (TAUs) consistent with the analysis in the 2012 RPU EIS/RTP EIS/R; as a result, the impacts of these de-facto TAU units have not been counted.

We recommend the IC/IEC analysis be revised to reflect the potential increases in traffic associated with the conversions of uses (e.g. commodities as well as single-family homes converted to de-facto TAUs, etc.), and the morphing of TAUs (based on the RPU’s definition of TAU size compared to the size of existing ‘transferred’ units¹⁶). The 2017 RTP analysis in the IC/IEC builds on the 2012 RTP analysis and 2015 Threshold Evaluation Report, which include assumptions regarding the transfer of such units, estimates regarding the number of existing and bonus units, and potential future units.¹⁷ This information can be used to assess the potential increase in the number of overnight accommodations (e.g. the number of

¹¹ Ordinance No. 2016-01, adopted 1/27/2015, Revisions to Chapter 50.10.8.

¹² <http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

¹³ FOWS & TASC comments on DEIR/S, included in TBAP Final EIR/S on p. 3.3-37 to 3.3-40; response provided on p. 3.3-141

¹⁴ Discussed in FOWS & TASC comments on final TBAP EIR to RPIC, 11/14/2016, p. 5-7 (attached)

¹⁵ See detailed comments in 4/21/2015 FOWS comments to the Regional Plan Implementation Committee (attached)

¹⁶ “Provided the conditions in subparagraph 1. above are met, 80 percent of the tourist accommodation units on the receiving site may be up to 1,200 square feet, with kitchens, and no more than 20 percent of the project’s floor area may contain units not to exceed 1,800 square feet, with kitchens.” (TRPA Code 51.5.2.K)

¹⁷ 2012 RPU DEIS, Appendix E, Part 7; 2015 Threshold Evaluation Report, Chapter 12.

‘bedrooms’ – which better reflect the overnight capacity of the units - rather than the number of TAUs) compared to existing conditions

The RTP (and RPU) should also include specific requirements for future project-level environmental impact analyses to compare the existing number of bedroom units associated with a sending unit(s), a single-family home that is being converted to a vacation rental use, and/or the CFA that is being used to develop the TAU (through the conversion allowances in the RPU and TBAP), to the post-project number of bedroom units and the associated increase in vehicle trips and other environmental impacts. For example, the RPU/RTP could include Code requirements for future project analyses to include a comparison of the existing number of bedroom units to the proposed number of bedroom units and to disclose and mitigate the associated human and vehicle population increases.

As noted in the 3/20/2017 comments submitted by the LTSLT, conversions of single-family homes to de-facto TAUs need to be regulated by TRPA. The current lack of regulation allows for growth beyond what was analyzed in the 2012 RPU EIS.

Impacts from projects in Squaw Valley and Martis Valley:

It is unclear whether the IS/IEC incorporates the most recent estimates included in the Village at Squaw Valley Specific Plan (VSVSP) EIR¹⁸ and Martis Valley West Parcel Specific Plan (MVWPSP) EIR.¹⁹ Appendix D discusses efforts taken to match forecasts with entry volumes modeled by adjacent MPOs,²⁰ however the document does not appear to include the more recent estimates of the additional in-Basin traffic that will be generated by these two projects (although the forecasts of potential traffic in both EIRs underestimated peak unit occupancy, as noted in numerous public comments on each EIR).

We recommend the IC/IEC be revised to incorporate the most recently available information regarding vehicle trip impacts from these adjacent Specific Plans, accounting for actual peak occupancy rates (rather than the reduced occupancy used in the associated EIRs), and/or if these impacts are reflected in the forecasts, the IC/IEC should be revised to clarify this.

Local VMT:

As noted in our comments on the TBAP (see excerpt from 12/1/2016 letter to APC; attached), the 2015 Threshold Evaluation Report includes data showing that VMT has increased in the North Shore and decreased in the South Shore.²¹ As documents continue to review significance based solely on the “regional” VMT standard, impacts at the local scale are not being adequately

¹⁸ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/villageatsquawvalley>

¹⁹ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/martisvalleywestparcel>

²⁰ “To reflect the potential growth along the two north entry-corridors, TRPA staff made slight adjustments to the hotel-motel occupancies as well as to beach attractiveness factors to influence greater day-use visitation from the two projects along the SR 89 and SR 267 corridors. The purpose of the analysis was intended to match the forecasted entry volumes forecasted in the Squaw and Martis Valley analyses to be commensurate with the forecasted model values. The comparison of TRPA modeled traffic entry volumes and the modeled entry volumes by adjacent metropolitan planning organizations is shown in Table D.17, below.” (draft RTP, App. D, p. D-26)

²¹ Table 12-15.

addressed. The 2017 RTP fails to discuss this distinction, and the IC/IEC includes no analysis of these local impacts. Although TRPA has initiated review of the VMT standard beginning with the formation of the Transportation Measures Working Group (as well as the Threshold Update Strategic Initiative process), the environmental impacts of the RTP occur on localized scales and should be analyzed and disclosed as such.

We recommend the RTP include more discussion of the differences in transportation impacts and trends in the north/west shore versus the south/east shore areas of the Basin (at a minimum, as we understand more analysis will be required in order to select appropriate boundaries), and that future projects and plans be required to evaluate these impacts separately. The proposed “No new VMT/vehicle trips during peak periods” approaches discussed previously should be evaluated based on both the regional and local scales.

Existing conditions (2014 baseline year):

The IC/IEC relies on 2014 as the baseline year to represent existing conditions for transportation. As noted previously, we understand that the year chosen to represent existing conditions cannot be a moving target and the analysis process began well over a year ago, however we are concerned that recent increases in traffic (beginning in 2015 through the present) are not sufficiently reflected by the 2014 baseline year (the LTSLT notes similar concerns in their 3/20/2017 comments). The 2016 TBAP EIR/S (released over eight months before the RTP IC/IEC) included updated 2015 estimates regarding VMT,²² however no similar process was done for the 2017 RTP analysis. Further, 2015 traffic counts within the Basin should be available from the state departments of transportation (e.g. 2015 California Department of Transportation traffic counts²³ and Nevada Department of Transportation VMT estimates²⁴ are already available online) and 2016 traffic counts should also be obtained, where available.

At a minimum, the IC/IEC should include the most recent transportation data available and discuss how it compares to the 2014 baseline conditions as well as trends in the Basin beginning in 2015. Further, the IC/IEC analysis and subsequent RTP requirements should include an additional ‘cushion’ wherein the plans account for more traffic than is represented by the 2014 baseline in order to err on the side of caution. For example, if recent traffic counts reveal a 3% increase in VMT (and/or peak trips),²⁵ the RTP should be adjusted so that it incorporates additional traffic reduction measures to address the additional 3% VMT (and/or peak trips) compared to what is represented in the 2014 baseline. In other words, if the 2017 RTP calls for a 7% reduction in traffic from the 2014 baseline year, but traffic counts from 2015 indicate traffic has increased by 3%, then the 2017 RTP should plan to ensure a 10% reduction in traffic, not 7%. This analysis should separate local and regional impacts, such that increases in one part of the Basin are addressed even if traffic has decreased in other areas of the Basin.

²² Placer County Tahoe Basin Area Plan and Tahoe City Lodge Final EIR/EIS, p. 3.1-5 and 3.1-6.

²³ <http://www.dot.ca.gov/trafficops/census/>;

²⁴ <http://www.nevadadot.com/home/showdocument?id=4436>

²⁵ Numbers in these examples are hypothetical.

Traffic-related impacts to public health and safety:

“Visit Tahoe” Category and peak exit congestion:

Peak visitor traffic primarily exiting the Tahoe Basin has become increasingly problematic in recent years,^{26,27} resulting in hours-long traffic jams²⁸ that effectively block roadways which have traditionally provided a means for emergency access. The RTP categorizes this traffic within the “Visit Tahoe” category, reporting that these trips account for 25% of the daily vehicle trips in the Basin.²⁹ However, the greatest impact from vehicles in this category occur on Sundays/Holidays, days after events, or heavy snow periods (as cited previously), thus the average daily vehicle metric does not appear to sufficiently reflect the source of these vehicle impacts (e.g. resident/commuter, recreation, or visitor).

We request the 2017 RTP also identify what proportion of the “Sunday/Holiday” gridlock exiting the Basin is associated with this class of drivers, as we anticipate it is far greater than 25% on affected peak days and such information is important to understanding the environmental and public safety impacts from these vehicles.

Measures to reduce peak exiting visitor traffic:

Entry/exit traffic is identified as a significant public concern.³⁰ Congestion is noted as a primary consideration for the 2021 RTP to address (although the 2012 RPU amendments and the 2017 TBAP allowed for even more congestion by permitting more degraded Level of Service [LOS] conditions).^{31,32} While extensive gridlock on peak days is currently a major public health and safety concern, the 2017 RTP does not adequately consider immediate actions to help mitigate these impacts or include specific and enforceable short- and long-term actions that can be taken to ensure emergency access is available when needed, although the RTP notes the importance of evacuation plans.³³ We recognize this will require coordination with public service entities, however the 2017 RTP should include specific actions TRPA can implement and related performance measures. Notably, the 2007 Angora Fire started on a *Sunday* morning and advanced swiftly. Had the roadways in that neighborhood been congested as they have been over

²⁶ <http://www.sacbee.com/news/local/article129393194.html>

²⁷ <http://southtahoenow.com/story/03/10/2017/city-county-state-and-law-enforcement-officials-meet-discuss-tahoe-traffic-jams>

²⁸ <http://southtahoenow.com/story/03/05/2017/heavy-traffic-south-lake-tahoe-city-advising-motorists-stay-town-longer>

²⁹ “...Visit Tahoe, the long distance trips to and from the Region, by visitors and commuters accounting for 25 percent of daily vehicle trips.” (RTP, p. 1-14)

³⁰ “Multiple themes and goals generated from the public are integrated into Linking Tahoe...Increasing quality-of-life and environmental benefit through reducing the high numbers of cars arriving and leaving the Region at the same time.” (RTP, p. 2-9)

³¹ Policy T-10.7: “These vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services (such as transit, bicycling, and walking facilities) are adequate to provide mobility for users.”

³² “In recognition of the LOS conditions in the Tahoe City Town Center, Area Plan Alternatives 1 through 3 would revise the LOS standards to allow LOS F during peak periods in town centers (Area Plan Policy T-P-6).” (TBAP DEIR/S, p. 10-16)

³³ “Wide-scale evacuation plans for the Lake Tahoe Region are necessary to address possible large-scale security incidents and natural disasters such as fires, earthquakes, and tsunamis.” (RTP, p. 3-34)

the past two years, the situation could have been far more dire. As noted below, more needs to be done now to set the stage for aggressive measures that can reduce vehicle travel to and from the Basin (e.g. the road toll/user fee approach and out-of-basin parking lots with shuttles [more details provided below]).³⁴

The 2017 RTP should discuss existing actions and efforts that are being taken to help address emergency access through neighborhoods associated with the “Sunday/Holiday” gridlock from visitors leaving the Basin (for example, El Dorado County Supervisor Sue Novasel recently explained the development of a “traction ordinance” related to chain requirements that will increase the authority to control chain requirements on county roadways³⁵).

The RTP should also explore additional options that can be taken in the interim during these peak conditions to improve emergency access, as well as initiate clear and aggressive efforts to pursue additional traffic-related measures, such as the Adaptive Roadway Management option (discussed more below).

Road tolls/user fees:

The concept of a Basin entry fee/road toll has been discussed in TRPA documents for over forty years.³⁶ Such a fee could provide much-needed funding for public transit (as discussed below, funding is one of the biggest impediments to a more effective system and funding shortfalls are substantial³⁷) as well as disincentivize the use of personal automobiles for traveling to the Basin³⁸ and incentivize carpooling, public transit use, and other ride-sharing concepts among visitors, thereby reducing traffic impacts to the environment and public health and safety. We understand TRPA has been working with the Trans-Sierra and Mega-region partners,^{39,40} however such efforts are long-term, and while improved regional transit to and from the Tahoe

³⁴ This concern was expressed by Board member Shelly Aldean during the 2/23/2017 annual retreat.

³⁵ <http://www.tahoedailytribune.com/news/gps-savvy-tourists-clogging-lake-tahoe-residential-streets/>

³⁶ “The CTRPA plan also recommends a basin user fee (a concept developed by TRPA) to finance the multi-modal transportation systems in the Basin.” (Draft EIR, Regional Transportation Plan Update, February 1976. California Tahoe Regional Planning Agency. Page 95)

³⁷ “That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system.” (RTP, p. 4-3)

³⁸ “Road user fees could be imposed in a variety of different ways that comply with Compact restrictions—for instance, as a congestion toll within the Region, or as a parking fee. This would provide a cost disincentive to driving and a cost incentive to utilizing the intercept lots and shuttles.” (TRPA RPU FEIS, Volume 1, p. 3-462)

³⁹ “The Trans-Sierra Transportation Coalition is a group of 11 California and Nevada counties, federal and state agencies, stakeholders, and citizens from Northern California and Northern Nevada committed to ensuring that the transportation system in the greater Trans-Sierra Region supports economic vitality and preserves an excellent quality of life. Mega-Region partners currently collaborating with the Tahoe Region include but are not limited to Washoe Regional Transportation Commission, Carson City Metropolitan Planning Organization and Sacramento Area Council of Governments.” (RTP, p. 2-6)

⁴⁰ “Coordination is already underway to identify solutions and prepare to implement more frequent and convenient connections between Lake Tahoe and northern California and Nevada cities including Truckee, Reno, Sacramento, Bay Area, Stockton, and Auburn. Concepts for new rail and transit services with transit centers that incorporate park and ride lots are being developed and are included on the plan’s unconstrained, unfunded project list. Through continued work with the Trans-Sierra Transportation Coalition these strategies will be refined and poised for inclusion and implementation through the 2021 RTP.” (RTP, p. 2-6)

Basin is a necessary part of providing an alternative to automobile use, incentives alone will not likely be enough; a road toll/user fee would help disincentivize the use of the private automobile. In fact, the 2012 RPU response to comments on the Final EIS specifically outlines the authority TRPA has to implement this measure (Volume 1, p. 3-462 to 3-463; excerpt attached). TRPA Governing Board members have also recently raised this option, noting that it would be best to begin efforts sooner rather than later as it will take substantial time and collaboration to implement such a measure.^{41,42}

Sufficient information exists to show the nexus between vehicle use and impacts to Tahoe's roadways and environment. Further, a substantial proportion of Tahoe's visitors come from the Bay Area and other places in California where roads commonly have tolls on them.⁴³ This is not a new or innovative concept. The idea of charging road tolls/user fees to enter natural recreational areas is also not new – National Parks already implement such an approach (although Lake Tahoe is not a designated National Park, the Basin's significance as a natural resource and status as a federally-designated Outstanding National Resource Water prove Tahoe's special status is undisputable).

We ask the TRPA to immediately and aggressively pursue the road toll/user fee option. The 2017 RTP should include a timeline for interim milestones related to implementing this approach.

Adaptive Roadway Management:

The 2017 RTP identifies Adaptive Roadway Management as an option to assist with travel during peak periods; this approach may also be combined with priority transit services to incentivize the use of public transit.⁴⁴ However, the 2017 RTP notes that additional funding

⁴¹ “Ms. Aldean said if there were no impediments, toll booths would be the solution to regulate the number of people in the Basin. Toll booths will take some legislative action but should be considered.” (2/22/2017 GB meeting minutes, p. 9)

⁴² E.g. “Ms. Aldean suggested including a Basin user fee in the range of options for the survey. It will [be] complicated and will require political will and some Legislative changes. If there is an appetite for people who live in the Basin or just outside the Basin to impose an entrance fee into the Basin, it would be a long term source of funding and is a solution to the increased popularity of Tahoe as a destination resort. Now is the time to start having this discussion. Surveying the residents who live in the Basin would be the first step. It needs to be included as a funding option and also for the long term, they need to find funding sources or an endowment. Mr. Sass suggested in the past that the Board needed to start using their political influence amongst the Board members to get the...user fee rolling down the track. He does not believe the portfolio approach will work, locals and the counties are not going to approve a tax to fund transportation in the Basin. There would need to be caveats on the user fee, but in lieu of that it is the simplest and easiest solution.” (2/23/2017, GB meeting minutes, p. 23-24)

⁴³ i.e. “The majority of visitors to North Lake Tahoe make a three-hour (or less) drive on I-80, from the Sacramento and San Francisco Bay areas. These account for 71% of winter visitors and 68% of summertime visitors.” (Trans Sierra Transportation Plan, March 2015)

⁴⁴ “Another example is prioritizing roadway access for transit and active transportation during peak times at peak locations to manage congestion and encourage less impactful travel methods. Adaptive roadway management on U.S. Highway 50, SR 89, and SR 267 would significantly improve entry and exit congestion during high peak visitation seasons and visitation at high-use recreation destinations.” (RTP, p. 3-31)

sources and collaboration will be necessary to implement this option,⁴⁵ and it is included in the “unconstrained” project list.⁴⁶

We request that Adaptive Roadway Management be prioritized among transportation projects and implemented as soon as possible (we herein reference the LTSLT’s 3/20/2017 detailed comments and recommendations). In the meantime, no new projects or events which will increase peak hour vehicle trips into and out of the Basin should be approved (regardless of whether the no VMT/vehicle trip increase measures previously discussed are included).

Parking:

The IC/IEC concludes the RTP’s impact on parking would be less than significant and explains that future project-level reviews are expected to address individual project impacts.⁴⁷ However, parking impacts are both a local and regional problem and require more extensive coordinated planning than can be provided project-by-project. In addition, as noted by transportation expert Greg Riessen, PE (in comments submitted by the LTSLT [cited throughout]), each additional parking space constructed means more VMT and congestion and resulting air and water pollution (excerpt below), yet the RTP’s policies do not call for a *net reduction* in parking spaces.

“Fundamentally, imposing a minimum parking requirement is the equivalent of requiring existing and new development to generate Vehicle Miles Traveled (VMT) and exacerbate traffic congestion. Each additional parking space constructed deepens the hole of air and water quality impacts that the Tahoe Basin is trying to climb out of. The report confirms this connection on page 57: “It is in the public interest to minimize parking wherever possible in order to...encourage non-auto transit modes.” However, there is no mention of VMT in the report, specifically, the relationship between parking and VMT. This document should describe how minimizing the parking supply serves to reduce VMT and addresses the TRPA’s VMT threshold, while increasing parking supply will increase VMT and undermine threshold attainment. Similarly, there is no mention in the report of the relationship between increased parking supply and worsened traffic congestion.” (12/9/2016 LTSLT comments on final TBAP DEIR/S, from transportation expert Greg Riessen)

Mr. Riessen’s 12/9/2016 comments also note that there is not a lack of existing parking spaces, but rather a lack of parking *management* (the latter concept is discussed substantially in the 2017 RTP⁴⁸). What should be gleaned from this information is two-fold:

⁴⁵ “However, adaptively managing the Region’s entry and exit roadways, U.S. 50, SR 89, and SR 267, cannot be realized without new funding sources, and agency collaboration and buy-in (unconstrained project list).” (RTP, p. 3-36)

⁴⁶ See “Table 3.2: Transit Services: Existing, Constrained and Unconstrained.” (RTP, p. 3-14)

⁴⁷ “8. Would the project result in changes to existing parking facilities, or demand for new parking?...As discussed in Chapter 2 of the 2012 RTP/SCS EIR/EIS, the 2012 plan would include projects that have the potential to increase parking demand, but would also include projects that would decrease the demand for parking and projects that would increase or improve parking facilities. Individual transportation projects would be subject to, or are currently undergoing, project-level environmental analyses to determine project-specific impacts of each project, including providing adequate parking for those projects that would increase demand. This would also be the case with the 2017 RTP/SCS. This impact would be less than significant.” (IC/IEC, p. 58)

⁴⁸ “Parking Management: The price and availability of parking has a significant impact by shaping how people decide to travel. Where parking is free, disorganized, or un-enforced, as it is along the Region’s state highways which provides access to many of Tahoe’s most popular recreation areas, roadsides can become crowded with parked cars. This uncontrolled parking leads to issues with roadside erosion and public safety. Where parking is

- 1) Additional parking spaces should be discouraged/prohibited and existing parking spaces reduced in order to reduce vehicle use (this does not mean new or redevelopment projects would not be allowed to construct new spaces in their project areas, however a system could be in place to ensure spaces elsewhere are reduced, just as there are coverage and other commodity transfer programs); and
- 2) It is more effective to better manage existing parking spaces to address peak needs rather than simply construct additional spaces.

The LTSLT's 3/20/2017 comments on the draft 2017 RTP also discuss the need for improved parking management and for adherence to the 2012 RPU's more aggressive reductions in parking minimums, and include additional comments from Mr. Reissen (incorporated herein). We support the 2017 RTP's focus on "parking management" as part of its strategy,⁴⁹ however, there is no mention of *reducing* the number of parking spaces in the Basin. At best, the RPU and subsequent Area Plans may strive to reduce the number of *new* spaces compared to previous minimum parking requirements⁵⁰ – but this still means *additional* parking spaces will be constructed. Further, there are many other options for parking management which can address parking needs, reduce vehicle use, and incentivize transit use⁵¹ that have not been incorporated into Area Plans or the RPU but can and should be included in the 2017 RTP.

perceived as free and unlimited people are less likely to use transit to access those areas or pay for parking in a safer more organized location. Successful parking management strategies help disperse where and when people travel. Parking strategies are dependent on the location and use of an area. For recreational areas, strategies could include combinations of no time limit parking lots with higher prices, limited and short-term roadway parking with medium prices, and free shuttle service. Through corridor planning, TTD and land management partners are exploring parking strategies that support improved access to recreation areas. These include a pilot project to test parking pricing along Tahoe's East Shore. This project will also explore using technology to let travelers know about the availability and price of parking in the area via smart phones, online, or changeable message signs." (RTP, p. 3-11 to 3-12)

⁴⁹ i.e. "Transportation system services and programs can respond to these varying conditions with dynamic traffic and parking management, diverse seasonal public transit services, real-time travel information, and incentives to use public transit, mobility hubs, bicycling and walking trails, and zero-emission electric vehicles." (RTP, p. 1-17); and as discussed during the 2/22/2017 TRPA GB hearing: "Mr. Haven said the Regional Transportation Plan wants to create an incentive and disincentive program to drive transit usage. As the programs are implemented and the tracking of ridership is done then that could be a future discussion...Mr. Cashman asked what types of incentives and disincentives are they considering...Ms. Beryl said parking management, dynamic pricing, and limitations of parking in certain areas..." (2/22-2/23/2017 GB meeting, minutes, p. 6)

⁵⁰ Response to comment number 12-42 in the TBAP FEIR/S: "The comment pertains to parking, both for the Area Plan and for the Tahoe City Lodge. Regarding Area Plan parking impacts, the actual parking demand and supply would depend on specific project projects, their design, and future land uses at a finer level of specificity than can be identified in the Area Plan (as specific types of commercial land uses, for example, have differing levels of parking demand), future shared parking arrangements, the degree to which future developers take advantage of in-lieu fee programs, and other factors. As a result, it would be speculative to identify a specific number of future parking spaces that would be needed or supplied. What can be concluded at a plan level of analysis is that the parking standards that would be adopted as part of the Area Plan would result in a lower number of additional future parking spaces in town centers associated with new development than would occur if the new parking standards are not adopted. (TBAP FEIR/S, p. 3.3-150) [Emphasis added]

⁵¹ Examples were provided by Mr. Reissen in the 12/9/2016 comments previously cited.

In addition, we support the 2017 RTP's policy to focus on improved transportation strategies, including parking management, for popular recreation sites,⁵² however the RTP should include a policy to prohibit additional parking spaces associated with expansions of existing recreational facilities (for example, the proposed expansion of the Lake Tahoe Golf Course into the Washoe Meadows State Park is likely to include a substantial number of new parking spaces). As noted above, this does not mean no new spaces could be constructed at a project site, however spaces would have to be reduced elsewhere in the project's vicinity (taking location and site-specific issues into consideration).

Funding:

Funding has been one of the primary impediments to implementation of a sufficient transportation system for decades.⁵³ The RTP notes that additional dedicated funding sources are necessary to achieve the long term vision, and that TRPA and partners will be working to identify such sources over the next four years.⁵⁴ Funding problems are exacerbated by the potential for existing funding levels to drop.⁵⁵ The RTP currently estimates a shortfall of \$3.8 billion in funding for the full transportation vision.⁵⁶ As just \$2 billion in funding is forecast over the next 23 years (assuming no reduction in existing levels),⁵⁷ this means funding will almost have to *triple* to achieve the full network. Without adequate funding, transportation networks cannot be sufficiently improved and existing problems will likely only get worse, especially as the populations of the Northern California and Nevada "Mega-Regions" grow by millions.⁵⁸

⁵² Policy 5.2: Provide multimodal access to recreation sites. Encourage collaboration between public lands managers, departments of transportation, transit providers, and other regional partners to improve year-round access to dispersed recreation activities. Strategies could include active transportation end-of-trip facilities, transit services, parking management programs, and incentives to use multi-modal transport. (RTP, p. 2-16)

⁵³ "This 2017 plan is a blueprint for a regional transportation system that also begins to address inter-regional travel demand. To achieve the long-term vision, TRPA and partners will need to collaborate to identify and source dedicated regional revenue sources to meet the larger need of comprehensive bus and rail service coupled with park and ride lots that will provide options to private vehicle use. This policy debate has been ongoing since the 1990s without resolution." (RTP, p. 4-3) [Emphasis added]; also see previous cite to 1976 CTRPA RTP DEIR: "The CTRPA plan also recommends a basin user fee (a concept developed by TRPA) to finance the multi-modal transportation systems in the Basin." (p. 95)

⁵⁴ "Now with a clearer understanding of the size of the demand, the time is ripe to engage the matter of regional funding. While we move forward to build seamless transit and active transportation systems within the Lake Tahoe Region, over the next four years TRPA and partners have the opportunity to identify new funding streams and be poised in 2021 to fully support the build out of the transportation system's long-term vision. This is necessary to ensure the preservation of the environment, residential quality of life, and quality experience for the millions of people who travel to the Lake Tahoe Region." (RTP, p. 4-3)

⁵⁵ "The estimated levels of future funding by the various transportation agencies within the Region assume that future federal and state funding will mirror historic levels. There is no guarantee that this will occur and the estimated shortfalls may increase dramatically if our state and federal partners cannot sustain current levels of investment into the future." (Trans Sierra Transportation Plan, p. 29)

⁵⁶ "The total amount of funding needed to deliver the constrained and unconstrained projects, operations, and programs for the life of this plan is just over \$5.8 billion. That leaves the Region with an \$3.8 billion funding shortfall over the next several decades to implement the fully envisioned system." (RTP, p. 4-3)

⁵⁷ "An estimated \$2 billion in revenue is anticipated over the 23-year forecast period." (RTP, p. 4-3)

⁵⁸ "The wide open spaces and attractions of the Trans-Sierra Region straddle what has been dubbed the Northern California megapolitan, the fast growing urban area stretching from San Francisco, through Sacramento, to Reno. The Northern California megapolitan is home to some 15 million people today, and this number is expected to

While efforts to garner adequate funding have been underway for decades, and the recent reclassification of the Tahoe Metropolitan Planning Organization (TMPO) to an urban MPO⁵⁹ may help Tahoe qualify for additional federal funding, this will still not be enough to cover the shortfall. Further, given Tahoe’s relatively small year-round population, it is generally recognized as infeasible to place the cost burden for such a network on local full-time residents.⁶⁰ While “local self-funding” approaches may help raise a portion of these funds, the 2017 RTP recognizes that such approaches are insufficient.⁶¹ However, the 2017 RTP does not discuss the potential funding that could be required of corporations and other large businesses (e.g. Edgewood, Vail, etc.) to help subsidize the cost of transit. As noted in the LTSLT’s 3/20/2017 comments, additional requirements and incentives for local employers are also an option.

We support TRPA’s efforts to explore additional funding mechanisms, including the options listed in Chapter 4 of the RTP (e.g. regional dynamic pricing strategies), although these options will not be sufficient to address the \$3.8 billion funding gap. However, as noted previously, a road toll/user fee has the potential to raise substantial funding and will provide a clear nexus between the road toll/user fee and the expenditure on Tahoe’s transportation systems. For example, the 2017 RTP notes that recent information indicates roughly 10 million vehicles travel to the Basin each year. If a road toll/user fee were applied to each vehicle upon entry to the Basin, funds raised could be as follows (this is an overly simplistic view that is only meant as a general example):

\$5 per vehicle = \$ 50 million/year; sum for 23 years = \$1.15 billion
 \$10 per vehicle = \$100,000 million/year; sum for 23 years = \$2.3 billion
 \$15 per vehicle = \$150,000 million/year; sum for 23 years = \$3.45 billion

Such options would clearly go a long way in raising the additional **\$3.8 billion** necessary to implement the full transportation vision.

We strongly urge TRPA to immediately and aggressively pursue a road toll/user fee option. Interim steps that could be incorporated into the 2017 RTP may include the formation of a Governing Board Committee to discuss political and other implications and associated solutions, and a technical working group to explore examples of how such a system may be installed and operated based on an examination of other locations where such road tolls/user fee systems are in place as well as coordination with other involved entities. TRPA could also undertake a Strategic Initiative to pursue this option.

increase by an estimated 25-30% by the year 2035. The natural beauty, yearround recreational opportunities, and solitude of the Trans-Sierra Region are a relatively short drive from these urban areas. This proximity makes the Region a key contributor to the overall quality of life for the millions that live and work in the Northern California megapolitan.” (Trans-Sierra Transportation Plan, p. 9)

⁵⁹ “In February 2016, the FAST Act upgraded TRPA’s status to an urban metropolitan planning organization, which requires TRPA to develop, establish, and implement a formal congestion management process.” (RTP IS/IEC, p. 3-50)

⁶⁰ i.e. “Visitation far outstretches anything our permanent population can do.” (Carl Hasty, TTD, 2/22/2017 GB hearing, minutes, p. 24)

⁶¹ “Local self-help funding is needed to match federal and state funds, but also require voter approval for initiation and renewal. These types of sources can levy relatively large amounts of funding, but are insufficient as the sole source that the Lake Tahoe Region relies on to achieve its long-term transportation vision.” (RTP, p. 4-9)

Other recommendations:

Additional land use options:

As detailed in the Petition for Writ of Mandate (Petition) for the lawsuit recently filed by the California Clean Energy Committee (CCEC) against Placer County's approval of the Tahoe Basin Area Plan (TBAP),⁶² there are additional actions that could be taken to mitigate transportation impacts (and the associated greenhouse gas emissions, air and water pollution, noise, and public health and safety threats). Although the Petition focuses on Placer County's approval of the TBAP, the actions recommended in the Petition, as well as comments on the draft and final EIR/S submitted by CCEC, FOWS and TASC, and the League to Save Lake Tahoe,⁶³ are also representative of potential RPU/RTP amendments including additional measures to reduce transportation impacts (and related environmental impacts). These recommendations should be included in the 2017 RTP and evaluated in the IS/IEC.

Additional information:

According to the IS/IEC, surveys have been performed within the last four years to gather updated information regarding public views on transportation.⁶⁴ It is unclear what the questions were or what information was gathered, however we recommend the following information be obtained (or if it already has, we request this information be provided to the public and included with the RTP documents):

- What frequency of transit service to and from the Tahoe Basin would be necessary for a substantial number of visitors to use public transit into the Basin?
- How much of an incentive would be provided by priority access for transit during congested conditions (through Adaptive Roadway Management)?
- How many hours in gridlock is too many hours (recognizing many visitors deal with regular gridlock every work day)?
- What is the importance of a transit service which allows pets (in other words, how many pet owners would use transit if pet-friendly transit service options that provided convenient and frequent transit service were available⁶⁵)?
- What amenities are necessary to encourage use (e.g. bathrooms on the bus, Wifi, seat comfort, etc.)?
- What will it take to overcome the discouragement of using transit for visitors with substantial luggage/gear?
- What is necessary to encourage visitors with children to take transit?

⁶² <http://friendswestshore.org/wordpress/wp-content/uploads/2017/01/Verified-Petition-for-Writ-of-Mandate.pdf>

⁶³ <http://www.placer.ca.gov/departments/communitydevelopment/envcoordsvcs/eir/tahoebasinap>

⁶⁴ "The policies, programs, and projects included in the 2017 plan have been vetted, modified and updated based on feedback received through multiple public and stakeholder workshops, surveys, and meetings held over the last four years. Over 800 people were engaged through qualitative and quantitative methods specifically for feedback on the 2017 RTP/SCS." (RTP IS/IEC, p. 2-1)

⁶⁵ This question stems from the 2017 RTP's reference to allowing dogs: "Hubs would be coupled with frequent transit that carries recreation equipment, luggage, and could allow dogs, with services reservable online." (p. 4-6).

- If these issues were addressed to visitors' satisfaction, what would their preference be with regards to getting from their homes to a location where they would board public transit to the Basin? For example, would park and ride lots be sufficient? Would such lots need to be manned for security to make users feel comfortable leaving their vehicles behind?

Although such survey questions would need to be determined by a professional in the field, these questions represent the type of information that would be important to assessing how to encourage visitors to use transit into and out of the Basin. Unfortunately, it is not likely to be an "if you build it, they will come" situation.

We request where such information has already been obtained, it be provided to the public and included with the 2017 RTP documents. Where such information has not been obtained, we recommend TRPA and partners conduct an appropriate survey of summer and winter visitors. We would also be happy to distribute surveys or other information to our members. In addition, we recommend TRPA gather similar information from transit networks in other locations where there is more successful transit use.

Conclusion:

In conclusion, we support the features of the 2017 RTP which will incentivize non-automobile modes of travel and increase public transit options, however we remain concerned that additional immediate actions are necessary to begin what is no doubt an intensive process to address some of the most impactful transportation problems in the Basin. It will be important for TRPA to take a strong leadership role to implement additional measures supporting adequate transportation funding, such as the road toll/user fee option. In the meantime, we also ask TRPA to adopt regulatory changes to prevent increases in VMT and peak vehicle trips associated with new projects and special and temporary events so that existing traffic problems are not exacerbated. We would welcome the opportunity to work with TRPA and other stakeholders to craft such policies and engage the public in their development.

2. VMT impacts:

The TBAP FEIR/S states cumulative regional VMT will increase even under the No Action alternative. As noted in our comments on the RPU EIS and TBAP DEIR/S (i.e. regarding changes such as conversions of CFA to TAUs), we do not believe the transportation analyses have sufficiently evaluated the TBAP's potential VMT impacts. Even if regional VMT were reduced by the RPU, this would still not address the local increases in VMT within the TBAP boundaries.

TRPA's RPU EIS deferred analysis of local impacts to the environmental analysis that would accompany the Area Plans.¹³ However, the TBAP fails to consider the local impacts, citing this is not necessary because the regional VMT standard would not be violated.¹⁴ TRPA's 2015 Threshold Evaluation Report (p. 12-27; see Table 12-15 below) shows an increase in traffic in the North/West area of the Tahoe Basin; notably, decreases in the South Shore appear to 'cancel out' the impacts of increased VMT in the north/west shore when only the regional VMT is considered.

Table 12-15. Change (Δ) in Daily Vehicle Trip Ends (DVTE) and Vehicle Miles Traveled (VMT)

Jurisdiction	2010	2011	2012	2013	2014	Total Δ by Jurisdiction
Douglas						
DVTE	800	1,259	-1,549	-2,732	3,724	1,502
VMT	3,200	11,353	-14,628	-12,649	15,082	2,358
Washoe						
DVTE	0	251	-892	-378	981	-38
VMT	0	6,171	-14,495	-1,908	6,565	-3,667
El Dorado						
DVTE	-1,500	4,200	-200	0	-7,900	-5,400
VMT	-5,643	13,935	-10,840	0	-33,866	-36,414
Placer						
DVTE	-800	1,000	-500	0	4,000	3,700
VMT	-4,040	14,477	-12,185	0	17,480	15,732
Annual Δ						
DVTE	-1500	6,710	-3,141	-3,110	805	-236
VMT	-6,483	45,936	-52,148	-14,557	5,261	-21,991
Notes: Based on traffic counts collected by Caltrans and NDOT. VMT is calculated by TRPA using average trip length, survey data and modeling. Source: TRPA, Caltrans and NDOT Annual Traffic Count Programs						

It is contrary to CEQA for TRPA's RPU to defer local impact analyses to future area plan reviews and then for subsequent area plan reviews to fail to perform local analyses because the RPU concluded regional standards will be met. This begs the question – if neither the RPU or area plans will address improvements to local traffic impacts compared to existing conditions, then when will this occur? Traffic is a regional and areawide issue, just as many solutions are also most effectively implemented at the regional and areawide scale (i.e. improved transit programs require coordination and implementation at a larger scale). Skirting this issue and

¹³ Noted in our NOP and DEIR/S comments.

¹⁴ "As described above, the Draft EIR/EIS clearly identified the significance criteria related to VMT, which is appropriately based on the only adopted VMT standard in the region." (FEIR/S, p. 3.1-7)

claiming future project-level reviews will address these impacts completely disregards the opportunity to ever address these impacts.

Further, from a GHG emissions perspective, while the FEIR/S claims the TBAP meets TRPA's RTP/SCS document, we believe that Tahoe should strive for more than the minimally-required reductions. TRPA's Development Rights Working Group recently discussed concerns that Lake Tahoe used to be "cutting edge" with regards to environmental planning but no longer are.¹⁵ Members agreed it was important to once again be a leader. The TBAP provides an opportunity to adopt innovative and more protective approaches to protect our climate. Further, as an area that will be subjected to the significant environmental and economic impacts of climate change, Lake Tahoe deserves better than the minimal effort.

Regional vs. local VMT impacts:

While it is correct that TRPA's VMT threshold standard is only regional, impacts to other threshold standards such as water quality, air quality, noise, and to other resources and public health and safety will still occur on a *local* scale; these impacts are not addressed by a regional VMT standard (we herein incorporate the 8/15/2016 comments by Greg Riessen, PE, submitted on the DEIS/R on behalf of the League to Save Lake Tahoe). CEQA and the TRPA Compact require that all impacts must be analyzed and disclosed, and mitigated where significant impacts may occur. This is why we have repeatedly requested, as early as in our NOP comments, that the EIR/S examine local impacts. That TRPA and Placer County failed to include significance criteria when the public first requested this analysis (notably, we requested this in the RPU analysis as well) to evaluate these impacts is no excuse to fail to evaluate them. The FEIR/S recognizes that traffic will increase within the Area Plan boundaries. It violates CEQA to fail to address these impacts to traffic within the TBAP, let alone the related local VMT impacts to other standards (i.e. water quality).

The FEIR/S also states that TRPA could choose to adopt a policy to examine local impacts, however, because no such policy currently exists now, it is not necessary to evaluate local impacts.¹⁶ While we appreciate that the FEIR/S acknowledges this issue, it still does not negate CEQA and TRPA requirements to evaluate all environmental impacts.

The FEIR/S also states that no meaningful information would come from an evaluation of local impacts.¹⁷ We do not agree. The reports regarding north/west shore trips versus south shore trips alone provide meaningful information, showing that traffic is on the rise in the TBAP area. This should necessitate that the TBAP include stronger traffic-reducing measures. Further, all available information regarding nearshore impacts indicates increased impacts from roadways and covered surfaces that are located closer to Lake Tahoe. This information necessitates that coverage closer to Lake Tahoe be reduced from existing amounts, and certainly not increased.

¹⁵ TRPA Attorney John Marshall, 9/7/2016.

¹⁶ "No other adopted VMT standards or regulatory requirements exist; development of an alternative VMT standard is within the policy discretion of the TRPA Governing Board. Placer County has not adopted a significance threshold with respect to VMT." (FEIR/S, p. 3.1-7)

¹⁷ "An analysis of the proportion of VMT that could occur within specific portions of the Plan area was not included because it would not provide meaningful information to assist in evaluating the Area Plan alternatives." (FEIR/S, p. 3.1-13)

These are just two examples of why local information is meaningful and necessary to guide future development in a way that protects Lake Tahoe.

We reiterate our request that the EIR/S examine local impacts, and believe its failure to do so is a violation of CEQA and the TRPA Bi-State Compact.

Proximity of roadways to Lake Tahoe:

It is inappropriate to rely solely on a regional focus when it is known that the closer roadways are to Lake Tahoe, the greater the threat from pollution. TRPA's 2015 TER notes that, "*Atmospheric deposition of fine sediments and adsorbed nutrients from road dust can have a disproportionately greater effect on the nearshore compared to deep lake sites due to proximity.*" (p. 4-37). The Lahontan Regional Water Quality Control Board's Lake Tahoe Nearshore Water Quality Protection Plan (2014) cited by the FEIR/S also notes that controllable factors such as the proximity of impervious surface to the lake may be partly responsible for local "hotspots" of periphyton.¹⁸ Further, the response to comments also acknowledges that traffic volumes have variable impacts on the nearshore water quality.¹⁹

3. Level of Service (LOS) Standard:

Substitute LOS Standard for Tahoe City:

Our comments on the DEIR/S raised concerns about the adoption of a substitute standard for LOS in Tahoe City to allow more congestion (lower LOS). The FEIR/S erroneously frames this issue as if there are only two options: one, to allow LOS to worsen, or two, to expand roadway capacity.²⁰ However, this ignores the third option: to evaluate and implement all available measures to reduce traffic on the roadways. While the FEIR/S includes revised and additional mitigation measures, not all available options were considered. In addition, measures that are difficult to implement or 'outside of the box' were dismissed; at some point, we will need to start going beyond the status quo to address these impacts. As our comments asked previously, if not at the RPU level, and not at the TBAP level, then when?

¹⁸ "The nearshore agencies have identified the need for geographically focused investigations of land uses and soils/geology to determine the causal factors affecting localized nearshore "hotspots" where elevated periphyton, increased turbidity, and/or high invasive clam populations have been measured. Controllable factors, such as proximity of impervious surface to the lake, sewer line exfiltration, concentrated recreation activities, and uncontrollable factors such as climate change and geology may be responsible for observed conditions" (p. 10)

¹⁹ "It is true that traffic volumes (or VMT, when volumes are multiplied by roadway length) may have differing impacts on water quality, but no local or regional standards have been defined for near-shore roadways." (FEIR/S, p. 3.3-143)

²⁰ "However, while there are those who disagree with the change in policy, Placer County and TRPA have concluded that increases in roadway capacity would be inconsistent with the Regional Transportation Plan and Regional Plan because they would also serve as an incentive for visitors and residents to use private automobiles instead of using alternative travel modes." (FEIR/S, p. 3.1-15)



Tahoe Regional Planning Agency
128 Market Street
Stateline, NV 89449

April 21, 2015

Subject: Update on Commodities Pilot Programs Development

Dear Members of the Regional Plan Implementation Committee:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments regarding the proposed Commodities Pilot Programs. We are concerned the proposed Pilot Programs will lead to substantially more growth in the Basin which was not analyzed by the RPU EIS. In fact, it was acknowledged at the 3/25/2015 RPIC hearing that the proposed Pilot Project 2 is “outside the scope of the RPU.” We also believe Pilot Program 1 is outside the scope of the RPU, as it would not meet the requirements in Code Section 50. Specific concerns are outlined in our comments to the Governing Board for 3/25/2015 (attached and incorporated by reference).

As we hope you will discuss during the 4/22/2015 annual GB retreat, there are other issues that TRPA, as the regional environmental planning agency charged with protecting Lake Tahoe, will have to face in coming years. Examples include the impacts of climate change and drought, such as increased flooding, lower lake levels, and ever-declining nearshore conditions. Strategies to **adapt** to climate change were not identified or analyzed in the RPU EIS,¹ nor were the appropriateness of the existing stormwater designs, which are based on the outdated 20-year (one inch per hour) storm.² Therefore, at this time, the RPU’s entire structure, which is based on outdated assumptions regarding weather patterns and flooding, is not adequate for dealing with the climate-related impacts we are already seeing in the Basin. The proposed Pilot Programs, which aim to further ‘implement’ the RPU, will only lead to more development that is not designed to address the new ‘normal’ for Lake Tahoe – more intense periodic storms, less snow, more rain-on-snow events, and more flooding.³

As also noted by RPIC members, these types of proposed changes often “become everyone’s expectations” or may be “etched in stone” (Placer County’s proposed Area Plan conversions were provided as an example). A complete environmental analysis is needed before any regional, or local, entity considers such amendments. It is also unclear what qualifies as “Centers” in the provisions in “3b” (p. 178). Would this apply to *Town* Centers, the High Density Tourist or Regional Center Districts, and/or mixed-use areas outside of Town Centers? Finally, at the 3/25/2015 meeting several RPIC and Local Government Committee members expressed agreement to discuss Pilot Program 2 in a ‘bigger picture’ commodity discussion at the GB’s retreat. We question why staff has brought forward a revised version in advance of the retreat, and request that the GB does not pursue the pilot programs at this time. FOWS’ comments regarding suggested priorities were provided to the Governing Board separately.

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

¹ In our 6/28/2012 comments on the Draft EIS, we clearly identified this need (see Final EIS, Volume 2, p. 3-379; http://www.trpa.org/wp-content/uploads/Volume_2_RPU_FEIS.pdf). However, the Final EIS response simply states: “The comment makes a strong case, however, that climate change impacts should be taken seriously in the Lake Tahoe Region and that a coordinated effort should be undertaken to understand and reduce these impacts. There are many efforts underway in the Region to better understand and address climate change, and the TRPA is an active partner in many, if not all of them.” (Volume 1, p. 3-299; http://www.trpa.org/wp-content/uploads/Volume_1_RPU_FEIS.pdf).

² See Final EIS, Volume 2, p. 3-379 and 3-478 for our comments on this need, and Volume 1, p. 3-347, as an example of how the Final did not address the issue: “The comment also states that the EIS should analyze whether the 1-hour storm design standard is appropriate throughout the Region. This comment refers to proposed provisions of the Regional Plan Update and does not pertain to the adequacy, accuracy or completeness of the environmental document. Please refer to Master Response 1, Comments Pertaining to the Draft Plans, Code of Ordinances, or Threshold Evaluation.”

³ http://www.waterboards.ca.gov/lahtontan/board_info/agenda/2015/jan/item_13.pdf;
<http://www.sfchronicle.com/science/article/New-normal-Scientists-predict-less-rain-from-6209104.php>



Tahoe Regional Planning Agency
128 Market Street
Stateline, NV 89449

March 24, 2015

Subject: Commodities Pilot Programs and Possible Future Priority Project

Dear Members of the Local Government and Regional Plan Implementation Committees:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments regarding the proposed Commodities Pilot Programs and Possible Future Priority Projects. We are concerned the proposed conversion ratio “pilot programs” will lead to substantially more growth in the Basin which was not analyzed by the RPU EIS. Specific concerns include, but are not limited to:

- Increased development from morphing of TAUs;
- Failure to fully evaluate the TDR program in light of other incentives and factors;
- Proposed conversion program is premature, and should only be considered as part of a comprehensive RPU update and threshold evaluation;
- Costs of commodities based on proposed conversions will favor conversion of CFA into TAUs, which will result in different impacts;
- Increased units and overall development of TAUs have not been evaluated in the RPU EIS; and
- Impacts to environmental thresholds have not been examined.

As the proposed change comes before the 2016 Threshold Evaluation, there is not adequate information available to assess how the changes may impact thresholds. In addition, no monitoring data for the thresholds, or tracking data for commodities and the TDR program, have been provided to date. Further, there is no understanding of the impacts of increased additional development in Town Centers (where the bonus units would be utilized) on the Lake, including localized impacts to Lake Tahoe’s nearshore. Increasing the amount of development that may occur in Town Centers through adoption of changing commodities is premature, not only due to the lack of new supporting data, but also is opposite to the intent of the Regional Plan’s stated four-year evaluation of thresholds and potential changes in policies and approaches of the Regional Plan.

Additionally, just as the proposed pilot programs require sufficient environmental review, the proposed priority projects for 2015 will require extensive review as well. However, as reflected by the proposed pilot projects, it appears a pattern has emerged whereby “prioritized” items are promoted through working groups and eventually result in proposed changes to the RPU without sufficient environmental review. In this case, what began as a priority item in 2014 has now resulted in the consideration of an important change to the RPU without having performed environmental review. Further, TRPA seems to be continuing to follow a strategy of keeping the rules for development in the Basin a moving target, which, in the absence of genuine environmental review and threshold findings, makes it virtually impossible for the public to know what future build-out will be.

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Susan Gearhart,
President

Jennifer Quashnick,
Conservation Consultant

Growth Limits in Regional Plan Update

As noted in the RPU EIS, *“Allocations are used as a growth management tool to ensure that development is consistent with progress toward meeting environmental thresholds.”* (DEIR, p. 3.2-8). The proposed amendments have not been evaluated in the context of the status of the environmental thresholds, nor does the staff report include evidence regarding positive or negative impacts to thresholds. Further, bonus units are not based on an assessment of the Basin’s carrying capacity; rather, they are created by TRPA.¹ The proposed commodity transfers, as noted below, will increase development potential even with the current ‘limit’ on bonus units. However, TRPA can easily add more bonus units in the future, just as more were added through the 2012 Regional Plan Update. As the staff report notes, the proposed Future Commodity System Issues and Potential Approaches (Attachment A) include: *“Allow[ing] public entities to use the pilot program conversion ratios within adopted area plans (note: may include on-site conversions) for jurisdictions’ own commodity pools)”* and the release of an additional 200,000 sq. ft. of CFA into the pool. These two actions combined are also likely to generate a significant increase in growth.

TAU morphing and conversions:

The proposed amendments may result in substantial increases in growth, as illustrated below.

1. Morphing of TAU size and resulting impacts to population, coverage, and number of vehicles:

For years, the TRPA Board and community members have frequently discussed the disproportionate size related to transferred TAUs (for example, 250-300 sq. ft. existing hotel rooms are torn down [one unit] and ‘transferred’ to develop new tourist units [one unit] upwards of 1,800 sq. ft.). However, first, taking the transfer ratios out of the mix for the moment, consider the following example: a developer can tear down 30 motel rooms, each 300 sq. ft. in size, and transfer the TAUs to construct 30 units, each 1250-1800 sq. ft. in size. This could result in a 6-fold increase in floor area (from 9,000 sq. ft. to 54,000 sq. ft.). Additionally, the smaller units may have housed two people with one vehicle; larger units may house 6-8 people or more. At two people per vehicle, this means more cars on the roadway and more demand for parking (which means more coverage). Increased parking will also create a disincentive to using public transit. This morphing situation does not currently exist with CFA - where a conversion of existing uses to CFA is currently allowed (Code 50.10.C), the conversion is equal – one square foot of existing floor area can be converted to one square foot of CFA.² However, the proposed transfer

¹ In addition to allocations and transfer protocols set in the 1987 Regional Plan, TRPA has established the Bonus Unit Incentive Program to encourage environmental improvements in the Region, which may include land conservation and protection, regional smart growth infrastructure, habitat restoration, public recreation opportunities, and reduced land coverage. Under the program, the environmental improvements of a proposed project are quantified using a point system and rights for additional, or bonus, units for residential or tourist accommodation are awarded based on the number of points earned by the project. Only projects within target areas are eligible for the Bonus Unit Incentive Program. (RPU DEIR, p. 2-11).

² Code 50.10.C: “Residential and tourist accommodation units shall be converted to commercial floor area at a ratio of one square foot of existing floor area to one square foot of commercial floor area, using the subsection 50.6.2 criteria for measurement of floor area;...”

ratios for converting CFA into TAUs do not limit the size of the TAUs. For example, under the proposed ratio, 454 sq. ft. of CFA would be converted to one TAU that could then cover 1,200-1,800 sq. ft.³

2. When transfer ratios are considered along with morphing, the increase in growth potential becomes even more exponential:

As noted above, TAU morphing may already result in a six-fold increase in growth potential (e.g. conversion of a 300 sq. ft. motel room to a 1,800 sq. ft. tourist accommodation). However, when the transfer ratios associated with transferring from sensitive lands to Centers are added to the mix, the growth could increase another three-fold.⁴ For example, first consider the 30-unit motel room noted above. After the transfer, floor area could have increased by 6 times; population by an additional 6 people per unit, and four vehicles instead of one per unit. However, if the transfer ratios are also applied, it appears this transfer could allow up to a 6-fold increase in coverage (a net increase of 45,000 sq. ft. of coverage) and a net increase in the number of new TAUs by 3 times. With larger TAUs and more of them, the increases could be as follows:

	Existing TAUs		New TAUs			
	Existing TAU	Total: 30 existing TAUs	New TAU	30 new TAUs	60 new TAUs	90 new TAUs
People/unit	1-2	30-60	6-8	180-240	360-480	540-720
Unit size (sq. ft.)	300	9,000	1,800	54,000	108,000	162,000
No. Vehicles	1	30	3-4	90-120	180-240	270-360

The point of the rough numbers above is to reflect the maximum possible increases in growth that could occur with existing TAU transfer ratios and Code provisions. While the Code allows increases in CFA area based on the transfer program, even the combination of incentives would not result in a potential 24-fold increase in CFA size (e.g. 720 people

³ Code Section 51.5.2.K.2: “Provided the conditions in subparagraph 1 above are met, 80 percent of the tourist accommodation units on the receiving site may be up to 1,200 square feet, with kitchens, and no more than 20 percent of the project’s floor area may contain units not to exceed 1,800 square feet, with kitchens.”

⁴ *Transfer of Existing Development/Transfer of Development Rights*

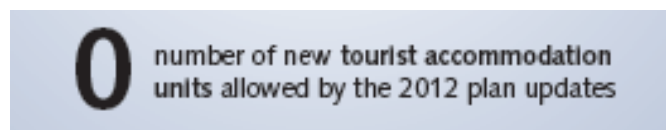
The above chart shows that transfer of existing development (e.g., when the sending site has existing development which is removed and the parcel is environmentally restored) is treated slightly differently than the transfer of a development right (e.g., when the sending parcel is retired and deed restricted, and the development right is transferred; these rights were granted in the original Regional Plan). The bonus units earned in both scenarios do not require an allocation from TRPA. The higher ratios are granted to the first column, when a sending site is both retired and structures are demolished to restore the site to its natural environment. If the sending site is located in a Stream Environmental Zone (SEZ), and is restored, the highest ratio is granted, (a total of 3 units for the existing 1 unit removed). It should be noted that this system applies to existing residential units (ERU), tourist accommodation units (TAU), and commercial floor area (CFA). Also, the receiving sites must be located in the districts in the Regional Plan Update designated as Town Center, Regional Center, or High Density Tourist Center. (BAE report included in RPU EIS, p. 3) [Emphasis added].

compared to 30 people per unit). Therefore, direct comparisons between TAU and CFA again mix apples and oranges.

The staff report, which appears to base its entire conclusion on the number of trips per unit, fails to account for the other Code provisions which allow for potentially significant increases in growth. Such increases allowed through the bonus unit program were not contemplated by the RPU, and therefore these changes would violate the claimed growth limits of the RPU.

3. **The result of the proposed conversion amendments would create additional new TAUs in the Basin, contrary to the growth contemplated by the RPU.**

One of the key ‘advertisements’ of the new RPU included no new TAUs:⁵



The RPU also advertised “retaining the established regional growth control system”⁶:

Important policies being addressed by the Regional Plan Update include:

- Retaining the established regional growth control system. Under this system, rampant overdevelopment was stopped and open spaces preserved. Most of the current policies in the Regional Plan will remain in place.

In summary, the proposed conversion amendments would allow for substantial increases in growth compared to what was analyzed in the RPU EIS, and therefore a comprehensive environmental analysis of the impacts of any proposed amendments to the commodities program is required.

Policy amendments need to be based on a review of all information at four-year increments, per the RPU:

The RPU was presented as a ‘package’ that would rely on limited commodities, as well as information about the thresholds, to improve threshold achievement and maintenance. As stated by the Executive Director in November 2012:

She will be presenting what Staff plans to report on whether the regional plan strategies are working. She said that the threshold monitoring is only one piece of those performance measurements of the Regional Plan’s success and progress. She is going to preview the whole package of reporting, on regional plan performance benchmarks...She will be presenting what Staff plans to report on whether the regional plan strategies are working. She said that the threshold monitoring is only one piece of those performance measurements of the Regional Plan’s success and progress. She is going to preview the whole package of reporting, on regional plan performance benchmarks (Nov. 2012 GB minutes, p.25)

⁵ http://www.trpa.org/wp-content/uploads/RPU_2pager_Numbers_3-251.pdf

⁶ http://www.trpa.org/wp-content/uploads/RPU_FactSheet_1-15-13.pdf

Yet the proposed amendments would change a part of this ‘package’ without any analysis related to threshold status, conditions, nor any assessment of how these proposed conversions would work with the larger “RPU package” to facilitate threshold improvement.

In addition, TRPA stated the full package would be assessed every four years, and with the threshold evaluation report serving as the ‘basis,’ changes to policies and strategies would be made (excerpt below). The proposed conversions are not associated with an updated threshold review, therefore making these changes now would contradict the intent of the RPU.

The performance benchmark reporting system is something that we have started a conversation with the California Legislative staff. There are more requirements and needs for regular annual reporting than only the Threshold indicators, here are all the different types of regional plan performance benchmarks; four of the five categories are new requirements under the regional plan update. In addition to our Threshold monitoring all five of these annual reports will roll up into the Agency’s four-year Threshold Evaluation and will be the basis of consideration when reprioritizing our annual budgets, as well as making changes to the policies and strategies of the Regional Plan. (Nov. 2012 GB minutes, p. 26) [Emphasis added].

TRPA also stated that the Board would receive information regarding CFA, TAUs, residential allocations and development rights, existing units of use, and bonus units used in incentive programs in order to make policy changes. However, this full package of information has not been made available for the proposed amendments to the commodities program.

A new category called for and required in the Regional Plan Update. It has become more important to track these factors of the Regional Plan Update Commodity Tracking so that we can best assess our new Regional Plan Update strategies. It has not been well tracked in the past, but one of the benefits of this Regional Plan and this EIS is that there is now a full, completely up-to-date, very accurate accounting of commodities in the Basin, and the intent is to keep it that way. We will be tracking commercial floor area, tourist accommodation units, residential allocations and development rights, existing units of use, and bonus units used in incentive programs. All will be available to report to the Board for policy making. (Nov. 2012 GB minutes, p. 27) [Emphasis added].

Failure to analyze Full Suite of TDR incentives

As TRPA’s staff explained a month before the RPU’s adoption,⁷ the RPU contains many incentives for re/development, in addition to the bonus units. For example, other incentives for encouraging re/development and removing coverage from sensitive lands include increases in height, density, and coverage allowances. The impacts of these other incentives, and any needed modifications, have not been assessed. Separating out the bonus unit program without addressing

⁷ Mr. Stockham said that a situation could arise where there is not restoration in Placer County because of the lack of incentives, but TRPA fundamentally disagrees with that thought. There is an abundance of existing development in SEZs and other sensitive lands in Placer County that is eligible for transfer and eligible for incentives. Just because the sensitive land development is in a town center does not exclude it from being eligible for incentives. It is not just transfer ratios. There are ratios for transfer of development. There are provisions for transfers of non-conforming coverage, which is a common situation in Placer County. There are increases in height, density and coverage allowances within centers to provide a receiving area for transfers of development and there are numerous other improvements and incentives to more actively incentivize and encourage the restoration of sensitive lands. There are far more than just any existing plan and more than just transfer ratios. The Regional Plan Update Committee spent many days working through those issues and developing compromises to balance the interests in providing these incentives with related concerns. (Nov. 14/15 2012 minutes, p. 6). [Emphasis added]

the other incentives results in a piecemeal approach, and the inability to understand what incentives may work and which may need revisions in order to meet the ultimate goal of restoring sensitive lands.

In addition to the RPU's new incentives, the TRPA Code has established several methods for projects to obtain TAUs or CFA:

50.10.1 General Conversion Standards:

Existing residential units may be converted to tourist accommodation units or commercial floor area, and existing tourist accommodation units may be converted to residential units or commercial floor area if the conversion complies with subsections 50.10.3, 4, 5, 6 or 7 and with the following conversion standards:

- A. The proposed conversion shall be evaluated for adverse impacts using the Initial Environmental Checklist (IEC) and the addenda developed by TRPA for conversions and shall not be permitted if adverse impacts cannot be mitigated;
- B. Residential and tourist accommodation units shall be converted on a ratio of one unit for one unit;
- C. Residential and tourist accommodation units shall be converted to commercial floor area at a ratio of one square foot of existing floor area to one square foot of commercial floor area, using the subsection 50.6.2 criteria for measurement of floor area; and
- D. A maximum of 200 residential units and 200 tourist accommodation units may be converted within a calendar year for the region.

50.10.2. Conversions to Multi-family Units

A pilot program is created under this subsection that allows for the conversion of no more than 200 TAUs to ERUs for multi-unit projects, subject to the following conditions:

- A. Each TAU can be used for a maximum of 1,250 sq. ft. of residential floor area;
- B. The conversion must happen on the same parcel; and
- C. TRPA shall monitor the impacts to thresholds of pilot program.

50.10.3. Transfer From Sensitive Lands

Conversion of an existing residential or tourist accommodation unit to a residential, tourist, or commercial use may be permitted when a residential or tourist unit is transferred from a parcel classified as land capability districts 1, 2, 3, or 1b (Stream Environment Zone), and the parcel is restored

The RPU FEIS, Volume 1, also noted the availability of 100's of unused development rights, which can be purchased and used to transfer development (and protect sensitive areas).

An important consideration in estimating future TDR utilization for development rights involved the development potential on parcels that currently have unused development rights. Available Regional-scale data indicate that approximately 535 development rights are currently located on unbuildable parcels (generally in SEZs) and an additional 765 development rights are located on parcels that may or may not be buildable (e.g., sensitive lands that are currently unbuildable under IPES). Development rights on unbuildable parcels can only be used if they are transferred to buildable parcels. These sensitive land development rights also qualify for the highest transfer ratios and are, therefore, more likely to be transferred to community centers. (FEIS, Vol. 1, p. 3-39). [Emphasis added]

The staff report includes no analysis of these other methods, what the environmental impacts and benefits would be using these other methods compared to the proposed amendment, nor has an economic assessment been presented evaluating the costs of the different ways projects may obtain these commodities.

No evidence of demand for hotel rooms:

Further, as it appears TRPA has predicated the change based on the belief that implementation of the TDR program will benefit the environmental thresholds, there has been no evidence presented by Placer County that the proposed conversion ratios will accelerate implementation of the TDR program and the restoration of sensitive lands. No evidence has been provided regarding a public demand for additional TAUs in Placer County. The recently-released “Economic Development Report”⁸ does not show a demand for new hotel rooms.

“At the same time, communities located just outside the Lake Tahoe Basin have been the focus of vast investment, creating comprehensive village-style resorts that capture visitor interest and revenue, but for the most part lack full-time residential populations that provide an authentic community atmosphere. This investment phenomenon has further diverted or flattened tourism market share from the once thriving lakeside Tahoe basin communities.” (Economic Development Report, p. 1)

“Finding-...The region is still perceived as a “drive-up” market. This driving-based daytime economy leads to an underrepresentation of activity usually accompanying summer resort operations, such as high-end evening dining, entertainment, and other local activities relying on a lodging base. Creation of new lodging and mixed use commercial product in the Town Centers to encourage walking, biking, use of public transit and other activities typically seen in economically vibrant mountain communities will assist in changing this dynamic...” (Economic Development Report, p. 3).

Rather, it appears that Placer County and development interests want to construct new hotel rooms in Placer County. This is not the same as providing evidence of a demand for them.

The Economic Development Report merely references developments in adjacent areas, such as Northstar and Squaw Valley, and implies that investments in additional units in those areas have resulted in economic benefits. First, comparisons to those areas are irrelevant, unless the Tahoe City community has decided it wants to look like Northstar and Squaw Valley (although this goes against all indications that the community wants to retain its existing character). Second, most infrastructure in Tahoe was built decades ago; whereas increased developments in places like Northstar have occurred in more recent years. Comparing the economies of places already developed decades ago to places with new development (note: not *redevelopment*) is comparing apples to oranges.

This again points to the need to perform a comprehensive examination of the commodities program to understand existing conditions and the impediments to the implementation of the program.

Commodity Values:

The proposed conversion ratio will create a situation where purchasing CFA and converting it to TAUs is likely to be far less expensive than purchasing TAUs. Under the proposed transfer ratio, if a developer purchases 454 sq. ft. of CFA, this will cost roughly \$18,160 (assuming CFA costs at \$40/square foot, the maximum noted in the RPU EIR Attachment, the 2012 BAE Report). If this CFA is converted to one TAU, the developer has just paid \$18,160 for the TAU. Notably, if

⁸ <http://www.placer.ca.gov/~media/ceo/tahoe/documents/2015-02-24-BOSHearing-Incentives-N-LakeTahoe-Town-Ctrs.pdf>; Hearing Report. Economic Development Incentives for. North Lake Tahoe Town Centers. Prepared for: Placer County. February 2015.

CFA costs \$30/sq. ft. (the low end in the BAE report), the developer will have paid even less for one TAU.

However, one TAU unit costs approximately \$25,000-65,000 per unit (BAE 2012). As a result, it will be far less expensive for developers to purchase CFA (of which there is a substantial availability in the Basin) and convert it to TAUs – thereby resulting in far more additional TAUs than were analyzed in the RPU EIS. Given the RPU EIS did not include any new TAUs in its analysis, it cannot be used to tier from and a new analysis of the impacts of these new TAUs is required.

Costs of Development Rights

The most challenging aspect of the pro forma analysis is estimating the future cost of development rights. The California Tahoe Conservancy, which serves as the California clearinghouse for TDRs (in Nevada, it is the State Division of State Lands), reports that they currently have existing development rights for residential units ranging from \$17,000 to \$20,000 per residential right. In addition, TRPA has collected information regarding past development rights purchase transactions. Its information indicates that past transactions for a sensitive lands retirement/restoration program ranged up to \$80,000 per development right. Thus, these form the low end (\$17,000) and high end (\$80,000) of the assumed existing residential development right purchased in the pro forma model for development of condominiums.

For Tourist Accommodation Units (TAUs), available information suggests that development rights have ranged in the past from \$25,000 to \$65,000 per unit. It should be noted that the available information for TAU development right costs is somewhat limited, as few of these projects have gone through the TDR process and obtained development rights in recent years.

Commercial Floor Area (CFA) development rights reportedly cost approximately \$30 to \$40 per right (which is per square foot). However, it has been proposed in the draft RP that each community in the Regional Plan receive an allocation of new CFA from a total pool of 200,000 square feet for the region; this allocation would be at limited to no cost to the developer if he/she can obtain the allocation from the development project host community (some communities charge a small amount to the developer). However, due to the draft nature of this proposal, the analysis herein assumes that the CFA development rights would need to be acquired at “market rate” costs; thus, for the projects with commercial space in their development program (Mixed-Use with ground floor retail), the full range of \$30 to \$40 per square foot of CFA for all new space developed, is tested. (BAE report, p. 6-7)

Pilot Projects:

The Code of Ordinances does not include any provisions allowing exemptions for projects or policy changes deemed “Pilot Projects.” However, the Code does require TRPA to make several environmental findings, including:

Code 4.4.2.C: “4.4.2.C. Confirm that any resource capacity utilized by the project is within the amount of the remaining capacity available, as that remaining capacity has been identified in any environmental documentation applicable to the project, including the environmental impact statement for the Regional Plan package;...”

Code 4.6: “TRPA shall find, in addition to the findings required pursuant to Section 4.4, and in accordance with Sections 4.2 and 4.3, that the Regional Plan and all of its elements, as implemented through the Code, Rules, and other TRPA plans and programs, as amended, achieves and maintains the thresholds.” (Code 4.6). [Emphasis added]

The staff report lists the following as “benefits” from the Pilot Projects:

Pilot Program 1:

Benefits: Replenish the tourist bonus unit supply needed to implement the transfer of development rights program, incentivize the restoration of SEZs and other sensitive lands, support re/development in centers, maintain consistency with the overall growth limits adopted as part of the 2012 Regional Plan amendments, and ability to tier from RP EIS analysis.

The benefits list does not indicate that replenishing the tourist bonus unit supply will equate to the restoration of SEZs or other sensitive lands. In fact, adding bonus tourist units (through conversion of CFA) bypasses sensitive land restoration, instead of incentivizing it. For example, Placer County could purchase banked TAUs from a private or public entity, and be awarded with three times as many TAU bonus units, without any on-the-ground SEZ restoration taking place.

In combination with the ability to morph TAUs into much larger units, the increases in growth could be significant. There is no discussion of the environmental impacts of this growth in the future in the RPU EIS, and therefore the environmental impacts have not been examined in detail. In addition, replenishing the TAU bonus unit supply before the first RPU four-year evaluation in 2016 is premature. There has not been a full ‘test’ and evaluation of the TDR program. If it is currently failing, there needs to be a detailed report regarding how and why it is failing, particularly given the RPU did not provide for any new TAUs, and the conversions will result in new TAUs.

The claimed benefits also include maintaining consistency with the overall growth limits in the 2012 RPU; as noted throughout the comments, the proposed amendments do not maintain this consistency. Finally, because the RPU EIS did not examine these amendments, and the anticipated increases in growth they will result in, TRPA cannot tier from the RPU.

We also ask which ‘benefits’ TRPA aims to achieve from the proposed Pilot project. Based on the TRPA Compact, TRPA’s role is to achieve and maintain the environmental thresholds, yet the listed benefits only include reference to one threshold – SEZ/sensitive land restoration. The other ‘benefits’ address alleged red tape and tiering from the RPU.

Pilot Program 2:

Benefits: Promote scenic threshold gains, promote restoration, concentrate development in Centers, may reduce Vehicle Miles Traveled (VMT), may facilitate Total Maximum Daily Load (TMDL) implementation, and promote development that uses contemporary design standards

The scenic threshold gains are presumably the threshold standard related to the built environment. There are two other scenic thresholds which aim to protect the **natural** scenic quality of the Basin.⁹ For example, the proposed project may result in the construction of 4-story tall buildings in Tahoe City (as allowed in Town Centers). Such structures will most likely harm the views protected by TRPA’s scenic thresholds based on the Basin’s natural qualities. TRPA must not ignore impacts to the natural scenic resources for the sake of presumed improvements to the ‘built’ environment. If the TRPA intends to overlook impacts of newly-sized projects on the natural scenic values of the basin, it must state so clearly, and establish criteria and limits to

⁹ http://www.trpa.org/wp-content/uploads/TEVAL2011_Ch9_Scenic_Oct2012_Final.pdf

such intrusions. Further, to allow new impacts on the natural scenic values of the basin is a serious matter and must be fully addressed in an EIS to examine the impacts regarding natural scenic standards.

The benefits statement also fails to include actual benefits to VMT and the TMDL, instead referring to the possibility that they ‘may’ have these benefits. The environmental findings TRPA must make for Code amendments do not allow for conclusions that projects “may” achieve and maintain the thresholds – rather, they require that the Regional Plan, as amended, achieves and maintains the thresholds (Code 4.6).

Future Commodity System Issues and Potential Approaches:

Considering the changes included in the list in Attachment A is also premature. Before additional changes to the RPU are considered, TRPA must first complete a thorough review of the thresholds, commodities tracking, and all related information TRPA must consider in the RPU update and review scheduled for 2016. We are concerned that, as reflected by the proposed pilot projects, a pattern appears to have emerged whereby “prioritized” items are promoted through working groups and eventually result in proposed changes to the RPU without sufficient environmental review. In this case, what began as a priority item in 2014 has now resulted in the consideration of a major change to the RPU without having performed environmental review. Further, TRPA seems to be continuing to follow a strategy of keeping the rules for development in the Basin a moving target, which, in the absence of genuine environmental review and threshold findings, makes it virtually impossible for the public to know, and therefore analyze, what future build-out will be.

- Increase VMT; and
- Reduce (worsen) LOS.

The FEIR/S concludes the TCL impacts to be less-than-significant because there will be a reduction in average daily trips, and the increased VMT and reduced LOS impacts are less than would otherwise occur under the No Action alternative.²⁸

We appreciate the revisions and additional mitigation measures included in the FEIR/S to address transportation impacts, including Vehicle Miles Traveled (VMT) and congestion. In addition, the explanation of historical changes regarding VMT modeling is extremely helpful; we appreciate this being laid out in detail for the public in the FEIR/S.²⁹

2. VMT impacts:

The TBAP FEIR/S states cumulative regional VMT will increase even under the No Action alternative. As noted in our comments on the RPU EIS and TBAP DEIR/S (i.e. regarding changes such as conversions of CFA to TAUs), we do not believe the transportation analyses have sufficiently evaluated the TBAP's potential VMT impacts. Even if regional VMT were reduced by the RPU, this would still not address the local increases in VMT within the TBAP boundaries.

TRPA's RPU EIS deferred analysis of local impacts to the environmental analysis that would accompany the Area Plans.³⁰ However, the TBAP fails to consider the local impacts, citing this is not necessary because the regional VMT standard would not be violated.³¹ TRPA's 2015 Threshold Evaluation Report (p. 12-27; see Table 12-15 below) shows an increase in traffic in the North/West area of the Tahoe Basin; notably, decreases in the South Shore appear to 'cancel out' the impacts of increased VMT in the north/west shore when only the regional VMT is considered.

²⁷ "As for impacts from the proposed Tahoe City Lodge project, the Draft EIS/EIR discloses that the project would reduce average daily trips, but produce both a small increase in VMT and decrease in LOS as compared to the baseline condition..." (FEIR/S, p. 3.1-2)

²⁸ "[The TCL would produce a] decrease in VMT and better (increase) LOS when compared to the "No Project" alternative (Alternative 4)." (FEIR/S, p. 3.1-2)

²⁹ p. 3.1-3 to 3.1-6

³⁰ Noted in our NOP and DEIR/S comments.

³¹ "As described above, the Draft EIR/EIS clearly identified the significance criteria related to VMT, which is appropriately based on the only adopted VMT standard in the region." (FEIR/S, p. 3.1-7)

Table 12-15. Change (Δ) in Daily Vehicle Trip Ends (DVTE) and Vehicle Miles Traveled (VMT)

Jurisdiction	2010	2011	2012	2013	2014	Total Δ by Jurisdiction
Douglas						
DVTE	800	1,259	-1,549	-2,732	3,724	1,502
VMT	3,200	11,353	-14,628	-12,649	15,082	2,358
Washoe						
DVTE	0	251	-892	-378	981	-38
VMT	0	6,171	-14,495	-1,908	6,565	-3,667
El Dorado						
DVTE	-1,500	4,200	-200	0	-7,900	-5,400
VMT	-5,643	13,935	-10,840	0	-33,866	-36,414
Placer						
DVTE	-800	1,000	-500	0	4,000	3,700
VMT	-4,040	14,477	-12,185	0	17,480	15,732
Annual Δ						
DVTE	-1500	6,710	-3,141	-3,110	805	-236
VMT	-6,483	45,936	-52,148	-14,557	5,261	-21,991
Notes: Based on traffic counts collected by Caltrans and NDOT. VMT is calculated by TRPA using average trip length, survey data and modeling.						
Source: TRPA, Caltrans and NDOT Annual Traffic Count Programs						

It is contrary to CEQA for TRPA's RPU to defer local impact analyses to future area plan reviews and then for subsequent area plan reviews to fail to perform local analyses because the RPU concluded regional standards will be met. This begs the question – if neither the RPU or area plans will address improvements to local traffic impacts compared to existing conditions, then when will this occur? Traffic is a regional and areawide issue, just as many solutions are also most effectively implemented at the regional and areawide scale (i.e. improved transit programs require coordination and implementation at a larger scale). Skirting this issue and claiming future project-level reviews will address these impacts completely disregards the opportunity to ever address these impacts.

Further, from a GHG emissions perspective, while the FEIR/S claims the TBAP meets TRPA's RTP/SCS document, we believe that Tahoe should strive for more than the minimally-required reductions. TRPA's Development Rights Working Group recently discussed concerns that Lake Tahoe used to be "cutting edge" with regards to environmental planning but no longer are.³² Members agreed it was important to once again be a leader. The TBAP provides an opportunity to adopt innovative and more protective approaches to protect our climate. Further, as an area that will be subjected to the significant environmental and economic impacts of climate change, Lake Tahoe deserves better than the minimal effort.

Regional vs. local VMT impacts:

While it is correct that TRPA's VMT threshold standard is only regional, impacts to other threshold standards such as water quality, air quality, noise, and to other resources and public health and safety will still occur on a *local* scale; these impacts are not addressed by a regional VMT standard (we herein incorporate the 8/15/2016 comments by Greg Riessen, PE, submitted on the DEIS/R on behalf of the League to Save Lake Tahoe). CEQA and the TRPA Compact

³² TRPA Attorney John Marshall, 9/7/2016.

require that all impacts must be analyzed and disclosed, and mitigated where significant impacts may occur. This is why we have repeatedly requested, as early as in our NOP comments, that the EIR/S examine local impacts. That TRPA and Placer County failed to include significance criteria when the public first requested this analysis (notably, we requested this in the 2012 RPU analysis as well) to evaluate these impacts is no excuse to fail to evaluate them. The FEIR/S recognizes that traffic will increase within the Area Plan boundaries. It violates CEQA to fail to address these impacts to traffic within the TBAP, let alone the related local VMT impacts to other standards (i.e. water quality).

The FEIR/S also states that TRPA could choose to adopt a policy to examine local impacts, however, because no such policy currently exists now, it is not necessary to evaluate local impacts.³³ While we appreciate that the FEIR/S acknowledges this issue, it still does not negate CEQA and TRPA requirements to evaluate all environmental impacts.

The FEIR/S also states that no meaningful information would come from an evaluation of local impacts.³⁴ We do not agree. The reports regarding north/west shore trips versus south shore trips alone provide meaningful information, showing that traffic is on the rise in the TBAP area. This should necessitate that the TBAP include stronger traffic-reducing measures. Further, all available information regarding nearshore impacts indicates increased impacts from roadways and covered surfaces that are located closer to Lake Tahoe. This information necessitates that coverage closer to Lake Tahoe be reduced from existing amounts, and certainly not increased. These are just two examples of why local information is meaningful and necessary to guide future development in a way that protects Lake Tahoe.

We reiterate our request that the EIR/S examine local impacts, and believe its failure to do so is a violation of CEQA and the TRPA Bi-State Compact.

Proximity of roadways to Lake Tahoe:

It is inappropriate to rely solely on a regional focus when it is known that the closer roadways are to Lake Tahoe, the greater the threat from pollution. TRPA's 2015 TER notes that, "*Atmospheric deposition of fine sediments and adsorbed nutrients from road dust can have a disproportionately greater effect on the nearshore compared to deep lake sites due to proximity.*" (p. 4-37). The Lahontan Regional Water Quality Control Board's Lake Tahoe Nearshore Water Quality Protection Plan (2014) cited by the FEIR/S also notes that controllable factors such as the proximity of impervious surface to the lake may be partly responsible for local "hotspots" of periphyton.³⁵ Further, the response to comments also acknowledges that traffic volumes have variable impacts on the nearshore water quality.³⁶

³³ "No other adopted VMT standards or regulatory requirements exist; development of an alternative VMT standard is within the policy discretion of the TRPA Governing Board. Placer County has not adopted a significance threshold with respect to VMT." (FEIR/S, p. 3.1-7)

³⁴ "An analysis of the proportion of VMT that could occur within specific portions of the Plan area was not included because it would not provide meaningful information to assist in evaluating the Area Plan alternatives." (FEIR/S, p. 3.1-13)

³⁵ "The nearshore agencies have identified the need for geographically focused investigations of land uses and soils/geology to determine the causal factors affecting localized nearshore "hotspots" where elevated periphyton, increased turbidity, and/or high invasive clam populations have been measured. Controllable factors, such as

Final Draft Plan also incorporates the elements of Mitigation Measure 3.8-4 that apply to the ADA exemption (Draft Code Section 30.4.6). The Draft EIS finds that the combination of coverage exemptions proposed under Alternative 4, with mitigation measures, would result in less-than-significant impacts.

The comment also states that a project applicant should be able to select one or more of the coverage reduction strategies for coverage mitigation (such as those listed for Alternative 4). This practice is currently allowed and is not proposed to be changed.

1129-6

The comment states that the RTP/SCS Draft EIR/EIS fails to provide adequate detail or analysis of the proposed Transportation Strategy Package B project identified as "Intercept Parking Lots with Shuttles to Town Centers." The comment further states that Article IX, Section (f)(8) of the Tahoe Regional Planning Compact prohibits the Tahoe Transportation District from imposing a "tax or charge that is assessed against people or visitors as they enter or leave the region...." The comment states that the RTP/SCS EIR/EIS should provide sufficient detail of the proposed "Intercept Parking Lots with Shuttles to Town Centers" and "road user fees" so a determination can be made whether or not the project is legal under the relevant provisions of federal law.

The comment correctly cites the Compact prohibition of an entry/exit tax. TRPA Compact Article V. PLANNING: Sub Paragraph (c): Section (2) states that the goal of transportation planning is:

(A) To reduce dependency on the automobile by making more effective use of existing transportation modes and of public transit to move people and goods within the region; and

(B) To reduce to the extent of feasible air pollution which is caused by motor vehicles.

TRPA Compact Article IX. TRANSPORTATION DISTRICT: Sub Paragraph (f) states:

(8) By resolution, determine and propose for adoption a tax for the purpose of obtaining services of the district. The tax proposed must be general and of uniform operation throughout the region, and may not be graduated in any way, except for a sales and use tax which, if approved by the voters, may be administered by the states of California and Nevada respectively in accordance with the laws that apply within their respective jurisdictions. The district is prohibited from imposing an ad valorem tax, a tax measured by gross or net receipts on business, a tax or charge that is assessed against people or vehicles as they enter or leave the region, and any tax, direct or indirect, on gaming tables and devices. Any such propositions must be submitted to the voters of the district and shall become effective upon approval of two-thirds of the voters voting on the proposition. The revenues from any such tax must be used for the service for which it was imposed, and for no other purpose.

This provision in the Compact prohibits a Region entry/exit charge administered by the Tahoe Transportation District, the entity with the authority to impose a fee or charge. Intercept lots are not specifically prohibited under the Compact. Road user fees could be imposed in a variety of different ways that comply with Compact restrictions—for instance, as a congestion toll within the Region, or as a parking fee. This would provide a cost disincentive to driving and a cost incentive to utilizing the intercept lots and shuttles.

A congestion pricing system would be compatible under certain circumstances with federal Law and the TRPA Compact. Regarding federal regulations, Title 23 United States Code: Section 129, Tolling Agreements, allows tolling of non-Interstate Highways as well as Interstate Bridges and Tunnels; it allows federal aid to be used for the construction and maintenance of toll roads, conversion of existing roads into toll roads, or adding toll lanes to existing roads, provided that the roads are not part of the Interstate Highway System. Since the roads in question—U.S. Highway 50 (a federal highway), California State Routes 89 and 28, and Nevada State Route 28—are not Interstates, they can be tolled. A congestion charge involving toll collection could be implemented in accordance with the Compact somewhere along U.S. Highway 50 and other Region roadways as long as it is within the Region and not at points of entry to it. A congestion parking fee could also be implemented in accordance with the Compact because it would charge people based on the times they decide to travel from their place of lodging or to their place of recreation and not based on the direction of their travel or the location of their residence.

Any road user fees would be required to comply with federal regulations and Compact restrictions, and therefore would not represent an illegal element of Transportation Strategy Package B (and Alternative 2).

The comment further states that the Regional Plan Update EIS should disclose whether Alternative 2 would be able to meet Tahoe's assigned GHG reduction targets for both 2020 and 2035 without this project. The comment is requesting analysis of a modified alternative; however, the Regional Plan Update EIS and RTP/SCS EIR/EIS already analyze a reasonable range of alternatives. No further analysis associated with intercept lots and road user fees, or the removal of these elements from the alternatives description, is required.

- I129-7 The comment raises concerns that linking release of allocations with roadway LOS is contrary to other stated goals in the Regional Plan Update and RTP/SCS that support multi-modal complete streets projects, such as the Kings Beach Commercial Core Improvement Project. Please see the Response to Comment A32-16 and Master Response 12, Relationship between Phased Allocations and Level of Service Significance Criteria.
- I129-8 The comment expresses concerns regarding the viability of the proposed transfer programs. The comment suggests that a high priority be placed on the development, funding, and implementation of the Development Rights Acquisition and Land Restoration Program, proposed in Comment I129-3. Please see the Response to Comment I129-3. In addition, the Final Draft Plan, described in Chapter 2 of this Final EIS, Revisions to Alternative 3: Final Draft Plan, includes a priority task (following adoption) to review the efficacy of the development transfer ratios (see Attachment 5 of the Final Draft Goals and Policies). Also, please see Master Response 8, Feasibility of the Proposed Transferable Development Incentive Program.
- I129-9 The comment expresses support for TRPA's goal to continuously update the Regional Plan in four-year cycles and to analyze the effectiveness of transfer development rights programs. This comment does not raise environmental issues or concerns regarding the adequacy, accuracy, or completeness of the environmental document. The comment is noted for consideration during project review.
- I129-10 The comment expresses support for the elimination of barriers to environmental redevelopment, specifically process duplications and cumulative costs in time and resources. Area Plans proposed under Alternative 3 are intended to allow public agencies to prepare plans



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Location
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Contact
Phone: 775-588-4547
Fax: 775-588-4527
www.trpa.org

DATE: April 11, 2017
TO: Mitch Markey, The Tahoe Backcountry Alliance
FROM: TRPA Staff
RE: Response to The Tahoe Backcountry Alliance Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Mr. Markey:

Thank you for The Tahoe Backcountry Alliance's comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your comments on the draft plan and your partnership in addressing winter recreation challenges at Lake Tahoe. We have responded to The Tahoe Backcountry Alliance's comments and recommendations below.

1. Clarification Request: Figure 1.10: Location of Popular Summer Destinations

We utilized this map, developed for the draft Corridor Connection Plan as an example to illustrate the newly available data for the Region, which helps us better understand travel patterns. This is just one example of the analysis created with this new data. Winter recreation destinations have also been analyzed, and will be incorporated in more depth in the upcoming draft Corridor Connection Plan and Long Range Transit Plan. The existing text references this, by saying:

"New data reveals high summer and winter use locations, the number of annual vehicle trips within each corridor, and the number of parking spaces versus the number of users, all of which lead to better tailored projects to meet demand."

Please also see, Policy 2.2 located in Appendix A, which states:

"Provide frequent transit service to major summer and winter recreational areas."

2. Recommendation: Incorporate discussion on impacted winter recreation sites such as Jake's Peak, Mt. Tallac (Spring Creek Rd.), Mt. Rose, Luther Pass, Freel Peak (High Meadows), and Big Meadows trailhead.

Thank you for this recommendation. We've added the following to text:

- Page 1-22: "This corridor is also a winter recreation corridor, including access to Mt. Rose, however access and transit service to this area can be improved."
- Page 1-25: "This corridor is also a major winter recreation corridor, including access to Luther Pass, Freel peak, and Big Meadows, however access and transit service to these areas can be improved."

- Page 1-26: “This corridor is also a major winter recreation corridor, including access to Jake’s Peak and Mt. Tallac, however access and transit service to these areas can be improved.”

3. Clarification: Location of Transit Stops

This plan does not designate specific locations for transit stops, as this is the responsibility of transit operators and local jurisdictions. The plan does illustrate high level concepts on where mobility hubs could help create a “park once” mentality, however specific locations for these hubs are yet to be determined. We will continue to work closely with our transit operators, local jurisdictions, and stakeholder groups like the Tahoe Backcountry Alliance on where transit stops and mobility hubs are most appropriate to serve both winter and summer needs.

We look forward to continuing our work with the Tahoe Backcountry Alliance on the [Lake Tahoe West Project](#), as well as highway corridor projects along the West and East Shores. Specifically, we hope the Tahoe Backcountry Alliance will participate in the planning of the [SR 89 Recreation Corridor Project](#). This project is in the preliminary phases and is listed as one of the priority projects we have requested receive funding under the newly passed Lake Tahoe Restoration Act. We encourage the Alliance to make contact with the US Forest Service’s Heather Noel (hnoel@fs.fed.us) to begin coordination on this project.

TRPA appreciates the Tahoe Backcountry Alliance’s comments and partnership in balancing winter access, parking management, environmental benefit, and transit services at Lake Tahoe.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency



The Tahoe Backcountry Alliance (TBA) would like to thank the Tahoe Regional Planning Agency (TRPA) for spearheading the effort to update the Regional Transportation Plan (RTP). Our organization and its members appreciate that TRPA recognizes the need to include TBA during winter recreation planning efforts. We feel the Draft RTP contains many laudable goals and creates much needed guidelines for an improved transit system in Lake Tahoe. However, it does not adequately address the significant challenges facing winter recreationists.

In recent years, winter access has decreased while interest in backcountry activities skyrocketed. This reduction of access along the Highway 89 Corridor has partly been a result of agency implemented sediment reduction projects without considering and maintaining recreation access. The agency was following specific measurable rules regarding environmental outcomes but did not consider or maintain commonly used recreation access pullouts. We fully support efforts to reduce sediment in Lake Tahoe but firmly believe that environmental concerns and adequate winter recreation access are not mutually exclusive.

TRPA has written that, *"Improving public recreation opportunities and recreation access are top goals for TRPA and we feel we can play a vital role in working with the backcountry ski community and bringing the right people and agencies together to tackle this issue. Improved recreation access, parking, safety, and transit service are key focus areas in the comprehensive plans that we are putting together to improve all of our highway corridors at Lake Tahoe,"* Joanne Marchetta, Executive Director at TRPA.

TBA fails to understand how this plan sufficiently addresses winter recreation access. For example, popular summer destinations have been illustrated in Figure 1.10 of the Draft RTP whereas there is no mention of high use winter recreation destinations. TBA requests that impacted winter recreation sites such as Jake's Peak, Mt. Tallac (Spring Creek Rd.), Mt. Rose, Luther Pass, Freel Peak (High Meadows), and Big Meadows trailhead to be included in the Draft RTP as areas in need for improved access and/or transit service. Furthermore, the list of proposed recreation transit stops appears to be highly summer centric while much of these winter recreation access issues can potentially be mitigated with a combination of frequently serviced public transportation stops and reliably maintained parking areas. TBA will readily share information and ideas regarding impacted access points for human-powered winter recreation along the transportation corridors addressed in the Draft RTP.

Winter recreation is a long standing Lake Tahoe tradition and valuable part of the Lake Tahoe community, culture, and economy. As such, it deserves to be recognized and supported more thoroughly in the Draft RTP. We thank you for your efforts to improve the transportation system in Lake Tahoe and are happy to collaborate in this to enhance winter recreation access.

Sincerely,

The Tahoe Backcountry Alliance



Mail

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Contact

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DATE: March 30, 2017
TO: Chris Fajkos, Tahoe Prosperity Center
FROM: Morgan Beryl, TRPA Senior Transportation Planner
RE: Response to Comments on Draft 2017 Regional Transportation Plan

Dear Chris,

Thank you for your comments on the draft 2017 Regional Transportation Plan. We appreciate your review and the work the Tahoe Prosperity Center is leading through the Connected Tahoe Project. We also appreciate the ability to participate on the Broadband Subcommittee to assist in creating a regional Dig Once Policy.

TRPA is very supportive of leveraging every opportunity possible to increase broadband service at Lake Tahoe. Once the plan is approved, we'll look at how to best apply our current dig once policy to ensure its effectiveness. We hope this issue can also be a focus for the broadband subcommittee.

We look forward to continuing our work together.

Sincerely,

Morgan Beryl
TRPA Senior Transportation Planner



TAHOE PROSPERITY CENTER

tahoeprosperty.org

To: Morgan Beryl, TRPA
From: Chris Fajkos, Tahoe Prosperity Center
Date: March 22, 2017
RE: Comment on Draft 2017 Regional Transportation Plan

Dear Ms. Beryl,

I would like to extend my gratitude towards you and the entire Tahoe Regional Planning Agency for recognizing the Tahoe Prosperity Center's Connected Tahoe Project and explaining its relevance to the region. We appreciate being recognized as a regional leader in promoting broadband expansion efforts in the Tahoe Basin and we look forward to our continued work with the TRPA on these efforts. After reviewing the Draft 2017 Regional Transportation Plan I would like to submit one official comment to be considered for further edits to the plan, as well as for future planning.

In Chapter 3, under Technology Goals, Policies, and Plans (pg. 3-24) it states:

"Make 'dig once' the basin wide standard, requiring public and private roadway projects to include the installation of conduit to support community needs. (e.g.: fiber optic, broadband, lighting, etc.)"

As you know, the Tahoe Prosperity Center is advocating for the creation of a Regional Dig Once Policy in an effort to incentivize Internet Service Providers (ISPs) to provide service to the various underserved communities in the Tahoe Basin. We see this as the best option to catalyze broadband infrastructure development as a means to facilitate broadband expansion to underserved homes and businesses in the Basin. Our comment is that we would like to see TRPA actually codify this requirement so that it becomes common law and not just a vague requirement, as it currently reads. We feel that more needs to be done on this front and conduit needs to be placed into projects that warrant this type of infrastructure. In 2015, the Tahoe Basin ITS Strategic Plan called for a Dig Once standard and that the "TRPA shall ensure all projects enact this standard." Since 2015 there have been countless projects in the Basin that were completed without having conduit included in them. The Tahoe Prosperity Center sees these as missed opportunities to create the middle mile infrastructure needed to foster continued broadband expansion.

To ensure we don't miss out on any more opportunities we ask that the language in the Draft 2017 Regional Transportation Plan that speaks to the creation of a "Dig Once" Basin Wide standard be codified in order to make this a real requirement for projects in the Basin, not just a polite suggestion.

Thank you again for your continued support of the Tahoe Prosperity Center, our efforts, and for working towards the creation of a "Dig Once" standard in the Basin.

Sincerely,

Chris Fajkos
Connected Tahoe Project Manager



Mail

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Contact

Phone: 775-588-4547
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DATE: April 10, 2017
TO: Morgan Fessler, Tahoe Rim Trail Association
FROM: TRPA Staff
RE: Response to Tahoe Rim Trail Association Comments on Linking Tahoe:
Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Fessler:

Thank you for Tahoe Rim Trail Association's (TRTA) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS), and for meeting with TRPA staff to review your comments and update the draft plan appropriately. We have responded to TRTA's comments below and included the updated text now located in the plan.

1. Recommendation: Clarification on connections to Tahoe Rim Trail from Heavenly Gondola.

TRTA requested clarifying language about the existing and planned connections between the Heavenly Gondola and the Tahoe Rim Trail. Page 1-24 has been updated to include the following text:

"The corridor's primary transit hub is located in the Heavenly Village adjacent to U.S. 50, public parking facilities, pedestrian paths and bicycle lanes which unofficially connects the bottom of the Heavenly Gondola to the Tahoe Rim Trail. Partners are also developing an official trail system to connect the top of Heavenly Gondola to the Tahoe Rim Trail. However, additional planning and support for this connection is needed."

2. Recommendation: Clarification on private recreation shuttle company's relationship to the Tahoe Rim Trail Association.

TRTA requested text be updated to clarify that though recreational shuttles are providing services that bring people to the Tahoe Rim Trail, that the TRTA does not partner or promote these services. Additionally, shuttle services require special permits by the US Forest Service, a process that does not involve TRTA. Page 3-7 has been updated to include the following text:

"Some private shuttle companies focus on the needs of the recreational hiker and biker by providing point-to-point pick-up and drop-off. Private providers include Flume Trail Bikes and Over the Edge Tahoe."

3. Recommendation: Include most up-to-date data on number of Tahoe Rim Trail users.

TRTA requested the plan include the most up-to-date data on the number of trail users. Page 1-8, under "Biking and Walking" the following text was added:

“For those wishing to recreate there are trails that connect from the shoreline to the famous Tahoe Rim Trail which receives roughly 400,000 annual users and the Pacific Crest Trail.”

4. Recommendation: More discussion of needed trailhead upgrades and other infrastructure improvements to increase public access through transit.

TRTA requested the plan speak more directly to the upgrades needed to improve access to trails by public transit. Page 3-7 has been updated with the following text:

“Though some transit stops are located at recreation destinations, upgrades to transit service and facilities to recreation sites, including connections to the Tahoe Rim Trail can be improved.”

TRPA appreciates the TRTA’s comments on the draft 2017 Regional Transportation Plan and looks forward to your continued participation in delivering the plan.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency



March 7, 2017

Tahoe Regional Planning Association
Attention: Morgan Beryl, Senior Transportation Planner
128 Market Street
Stateline, NV 89449

Re: Tahoe Rim Trail Association comments regarding the Draft Regional Transportation Plan

Dear Ms. Beryl:

On behalf of the 2,300 member Tahoe Rim Trail Association (TRTA) I would like to comment on the recently released draft version of TRPA's Regional Transportation Plan. The TRTA applauds the efforts of TRPA to address critical transportation issues within the Basin and looks forward to working in partnership alongside other organizations and agencies to improve our existing transportation system. I hope that the comments below help clarify some statements in the plan that relate to the Tahoe Rim Trail system.

The third paragraph on page 1-24 states "...the Heavenly Gondola ... connects to the Tahoe Rim Trail". While it is true that one can walk from the bottom of the gondola to Van Sickle Bi-State Park and then reach the TRT via the 3.3 mile Van Sickle Connector trail, there is no trail or other designated path from the gondola to the park. In addition, it may be productive for the plan to mention that the gondola does not currently connect with the TRT at the top of the mountain either. While the TRTA, the US Forest Service Lake Tahoe Basin Management Unit, Heavenly Mountain Resort, and the Tahoe Area Mountain Bike Association have discussed plans to create such a connection, this project is currently unfunded.

The final paragraph on page 3-7 claims "Some private shuttle companies partner with the Tahoe Rim Trail Association and focus on the needs of the recreational hiker and biker by providing point-to-point pick-up and drop-off". Though private shuttle companies do operate around the Basin and some provide service to TRT trailheads, the TRTA neither partners with nor promotes any such service. In addition, all shuttling operations require a special use permit issued by the US Forest Service, a process that does not involve the TRTA.

While the plan discusses the number of visitors and their vehicles in the Basin it does not go into detail regarding the number of trail users. Such data could provide a more robust context for understanding how significant our local trail systems are in addressing and responding to transportation issues. The most recent data from our visitor use monitoring program, which utilizes infrared trail counters to estimate trips on the TRT during the summer months, suggests that the TRT system receives over 400,000 annual users.

In addition, the plan could speak more directly to the need for trailhead upgrades and other infrastructure improvements that would allow public transportation to access recreation areas. The TRTA supports public transportation access to trails but needs a wide base of support to implement trailhead redesigns and/or improvements including bus stop shelters and turnarounds to make such access possible. The TRTA looks forward to working with other parties in the Basin to improve trailheads that provide access to the TRT.

I appreciate your time in considering these comments.

Thank you,

A handwritten signature in black ink that reads "Morgan Fessler". The signature is fluid and cursive, with the first name "Morgan" being larger and more prominent than the last name "Fessler".

Morgan Fessler
Executive Director
Tahoe Rim Trail Association

**Mail**

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Location

128 Market Street
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Contact

Phone: 775-588-4547
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DATE: April 11, 2017
TO: Tamara Wallace, South Lake Tahoe
FROM: TRPA Staff
RE: Response to Comments on Linking Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Ms. Wallace:

Your feedback on the 2017 RTP is greatly appreciated and valued. The public outreach to individuals and stakeholders completed during the drafting and final approval for the RTP met if not exceeded requirements set by Title 23, CFR part 450.316(a). Public outreach is not just a requirement for TRPA, it is the foundation of the agency. The agency continually strives for new and innovative ways to collaborate with everyone in the Lake Tahoe Region. Stakeholders are not the only input but are valued because they often represent the opinions of more than just themselves.

Many of your comments were specifically siting the U.S. Highway 50 South Shore Community Revitalization Project (Revitalization Project). TRPA is one of the many partners that will be working to ensure funding commitments, approvals and deadlines are met. It is in everyone's best interest to complete projects expeditiously and within budget. We will gladly share your comments received with the Tahoe Transportation District (TTD) as this may be the most appropriate avenue for this detailed input since the project is currently in the environmental documentation process. The Environmental Impact Statement is due out the first half of this year.

The Revitalization Project cannot happen overnight nor can a single project create a transportation network that works for everyone. Projects are required to go through a dynamic planning approval and implementation process to allow for public input, find the best alternative and address concerns. Large projects like this one do have tradeoffs however the planning process, all be-it multifaceted, is in place to address those tradeoffs and concerns. This project is one of many projects within the RTP constrained project list that will help fill active transportation gaps, improve safety and provide real options for alternative transportation to reduce congestion.

The Revitalization Project and others such as our regional transit operators transit service enhancements projects will be given precedence under the Draft 2017 RTP Policy 4.0 because they, "... fulfill TRPA objectives in transit, active transportation, transportation demand management, and other programs and directly support identified TRPA transportation performance." As a Large MPO TRPA will have an opportunity to fund even more projects than before that meet the RTP goals and fulfill its policies.

Thank you for you again for your time and effort on reviewing the 2017 Regional Transportation Plan and the Highway 50 South Shore Revitalization project within it.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency

Tamara Wallace
PO Box 7743
South Lake Tahoe, CA 96158
(530) 545-2623
tami_wallace@hotmail.com

March 23, 2017

RE: Comments-Draft 2017 Regional Transportation Plan

Morgan Beryl
Senior Transportation Planner
TRPA
P.O. Box 5310
Stateline, NV, 89449

Dear Ms. Beryl:

Thank you for the opportunity to comment on the Draft 2017 Regional Transportation Plan. My comments will deal specifically with the Highway 50 South Shore Revitalization Project more commonly known as the Loop Road.

- First your own plan touts feedback from 100s of stakeholders, while at the same time stating that the plan will affect upwards of 24 million. How is this equitable?
- If TRPA's mandate is not to expand the roads system and increase capacity, but instead to produce viable alternatives (ie, biking, walking, public transportation), why is the Loop Road on it's project list? It certainly seems to fall into the "increased capacity" category.
- There is currently NO additional parking in the plan. How does this translate to making the Stateline corridor more bikeable and walkable?
- Tahoe Transportation District, the project implementer, currently is failing at their primary function, bus service. How can we then expect TTD to competently implement at \$74+ million project?
- Measure T was a clear message to the City of South Lake Tahoe, TTD and TRPA that the Loop Road project is less than satisfactory in it's current form and that the voters want a say on a project of this magnitude. Why then are you/they not listening?
- If technology and alternative solutions (biking, etc) are basic tenets of the Regional Transportation Plan, then why is the Bicycle Coalition having difficulty getting funding for a bike trail app? They are currently fundraising to PRINT approximately 50,000 paper maps. Why isn't there a partnership with TRPA to fund an app that can be used offline? This would actually accomplish getting folks out of their cars. Not to mention saving the resources that printing this many paper maps would take.
- Our area was recently changed from a Rural to Urban transportation area (apparently in an effort to meet funding requirements for the Loop Road project and possibly other projects in the Regional Transportation Plan). This new designation has had detrimental impacts on transportation services between the Lake Tahoe Basin and Carson City/Carson Valley. Why destroy proven transportation services?

- The construction timeframe on the Loop Road will, I believe, cause unnecessary additional congestion in an already congested area for many years.
- South Lake Tahoe, like many cities, is in a housing crisis. Taking out up to 90 homes to construct an unnecessary bypass will cause additional burden on the citizens of our community. Also, it will affect a mostly Hispanic neighborhood. This population is least likely to raise vocal opposition to the project. They may have concerns about immigration status or language barriers; however, not taking their concerns into account seems somewhat racist.
- The Loop Road project does not meet the stated goals for the Draft 2017 Regional Transportation Plan:
 - Goal #1 – Environment
 - There is little to no measurable positive environmental gain to this project.
 - Goal #2 – Connectivity
 - Re-routing a highway through a neighborhood, as opposed to a business district, does not increase connectivity.
 - Goal #3 – Safety
 - Re-routing a highway through a neighborhood, as opposed to a business district, endangers children and families.
 - Goal #4 – Operations and Congestion Management
 - Relocating traffic does NOT improve congestion, in fact it will be much worse in the short term. During construction.
 - Goal #5 – Economic Vitality and Quality of Life
 - The Economic Analysis finds no significant economic improvement.
 - Destroying a neighborhood does NOT increase quality of life in a community.
 - Goal #6 – System Preservation
 - This project does not meet this goal in any way.

In short, the Draft 2017 Regional Transportation Plan has several good projects that should take priority over the Highway 50 South Shore Revitalization project (Loop Road). Please consider removing this project from the plan until the countless issues with the project are dealt with appropriately.

If you have any questions, please feel to contact me at (530) 545-2623 or tami_wallace@hotmail.com.

Respectfully submitted,

Tamara Wallace

Thank you, Todd for your comments on the draft 2017 Regional Transportation Plan.

We are encouraging our transit operators to provide more bicycle carry capacity on their buses, as we know that is a vital multi-modal connection for recreation and getting to in town destinations.

I've cc'd George Fink, who operates the South Tahoe transit service. He will be able to give you more details on what TTD plans to do to increase bicycle carry capacity on buses.

Thanks,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Todd Johnston [<mailto:toddjohnston.chrome@gmail.com>]
Sent: Thursday, March 23, 2017 6:36 PM
To: Morgan Beryl <mberyl@trpa.org>
Subject: Proposed room for more bikes on TRPA Buses

Hello, I am a frequent visitor to the Tahoe area , at least once a week during the summer months. I have heard that the TRPA is thinking about adding more space/racks for bikes on the buses. This seems like a great idea as it would allow me to have better access to trails and other areas in Tahoe while I visit.

Thanks,
Todd Johnston

Hi Kelly:

Thank you so much for your comments on the draft 2017 Regional Transportation Plan. We really appreciate our neighboring areas and partners reviewing our plan to ensure accuracy and consistency so we are able to continue strong collaboration. I've addressed your comments below in red. Please feel free to get in touch if you would like to discuss further.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Kelly Beede [<mailto:KBeede@townoftruckee.com>]

Sent: Wednesday, March 22, 2017 2:20 PM

To: Morgan Beryl <mberyl@trpa.org>

Subject: TRPA RTP Comments

Hello Morgan,

Here are the comments from the Town of Truckee related to the transit section of the TRPA Draft 2017 Regional Transportation Plan.

- As Truckee is the gateway to North Lake Tahoe within the Tahoe Basin and to two major ski resorts just outside the Tahoe Basin, the impacts to Truckee's roadway infrastructure are significant, and associated traffic congestion can adversely affect the quality of life in the Truckee community. As elements of the TRPA Regional Transportation Plan are considered for implementation, it will be important to include the Town of Truckee in the dialogue of enhancing transportation options in our region.

Thank you for this comment. We agree that the Tahoe Truckee partnership is vital to successfully better manage congestion leading to and at Lake Tahoe. We look forward to continuing to strengthen our partnership as we look at ways to deliver the important project, programs, and strategies discussed in this plan.

- The map on page ES-2 reflects park & ride lots just off the I-80 corridor within Truckee with public transit options. The transit section narrative indicates there will be a comprehensive transit system serving these locations. The discussion of transit funding on page ES-5 identifies that new or enhanced transit service to Truckee is included in the constrained funding plan. This

infers that TRPA has identified and secured a funding source for the new transit services and development of park & ride lots within Truckee. While operating funding has been identified in the constrained project list in Appendix B (page B-3), the associated capital project list does not identify funding for development of the park & ride lots off the I-80 corridor within Truckee. The Town of Truckee would like TRPA to consider including land acquisition and development costs associated with the identified park & ride lots in the constrained funding plan. When TRPA pursues this project in Truckee, consultation with the Town of Truckee will be required.

A few items I'd like to clarify here:

1. The park and ride locations for the purposes of this plan are highly conceptual. More detail and analysis will be conducted project by project, in partnership with local jurisdictions (including Truckee), and through corridor management plans. All park and ride locations are located on the unconstrained project list. You can find this in Appendix B, page B-7, first two line items.
 2. Funding for increased transit service: Some projects, but not all on the constrained project list have secured funding. The constrained list projects are the projects we believe the Region will have foreseeably available funding to deliver, but this does not mean the funding is secured. Once funding is secured, it is programmed through our federal transportation improvement program (FTIP).
- It was also noted that there are no park & ride facilities proposed within the Tahoe Basin (page ES-2). What is the reasoning?

The maps located in the Executive Summary as well as within Chapter 1 are high-level conceptual maps that are illustrating the basic concepts of providing options to transportation users and creating a park once mentality. It is not an actual representation of approved or detailed planned projects. Park and ride lots are also being considered for in-region locations. This will be discussed more in depth in the Corridor Connection Plan, a TTD lead project. Additionally, local area plans include parking plans for their individual areas. Once projects are further developed and ready to be placed on the regional transportation plan project list, they are submitted by local entities for inclusion. Some park and ride lots are being delivered through the SR 28 Corridor Improvements.

- Page 3-6 identifies providing transit service between the Tahoe Basin and Reno utilizing the I-80 corridor. The inter-regional project outlined in Appendix B (page B-3) also identifies transit between the Tahoe Basin and Sacramento using the Hwy 50 corridor. The Town of Truckee would like TRPA to consider including transit service between the Tahoe Basin and Sacramento that uses the I-80 corridor as providing transit service along I-80 could improve traffic congestion within Truckee and decrease the impacts to Truckee's roadway infrastructure.

TRPA agrees this is an important connection. We do however, depend on our transit operators to provide information to TRPA on projects they have in their constrained or unconstrained plans for inclusion on our lists, so we are proposing projects that are supported by project implementers. If TART is considering this connection, please let us know the details and we'll add it to our list as appropriate.

- The website associated with TART is "TahoeTruckeeTransit.com" not "laketahoetransit.com" (see page 3-6). It should be noted that both Placer County and the Town of Truckee operates

TART. Placer TART operates the North Shore and Regional services between Truckee and North Lake Tahoe while Truckee operates the Truckee TART local routes.

Thank you for this comment. We have added the following text: “Two transit operators, Tahoe Transportation District (TTD) in the south and Placer County and the Town of Truckee who jointly operate TART in the north, provide local bus services at Lake Tahoe.”

When I type Tahoetruckeetransit.com it reroutes me to laketahoetransit.com. I’ll reach out to the Truckee North Tahoe TMA who manages this website and ask their preferred address that we publish in the plan.

The Town of Truckee appreciates the opportunity to provide comments on this important planning document. What is TRPA’s timeline to respond to comments?

Thank you,

Kelly Beede
Administrative Analyst II
Town of Truckee
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DATE: April 11, 2017
TO: Jaime Wright, Truckee North Tahoe Transportation Management Association
FROM: TRPA Staff
RE: Response to Truckee North Tahoe Transportation Management Association
Comments on Linking Tahoe: Regional Transportation Plan/Sustainable
Communities Strategy (Draft)

Dear Ms. Wright:

Thank you for Truckee North Tahoe Transportation Management Association's (TNT/TMA) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). We appreciate your comments on the draft plan and your partnership in delivering effective transportation in the Region and beyond. We have responded to TNT/TMA's comments and recommendations below.

1. Recommendation: Adding the 1-80 corridor summary into the plan.

Thank you for this recommendation. We agree that both the North and South entry corridors are major components to better managing congestion at Lake Tahoe. As you note in your letter, the 2017 Regional Transportation Plan's major focus is on the Discover Tahoe travel behavior pattern. This is one of the reasons we specifically highlighted the internal six corridors identified for the Region. Additionally, through our partnership with the Tahoe Transportation District's Corridor Connection Plan and Long Range Transit Plan, we know the two entry corridors will be addressed in much greater detail within those plans. Through these various planning efforts and the Trans-Sierra Coalition partners are delving into how to better plan, fund, and deliver joint projects for our North and South entry corridors. As this moves forward, and we begin planning for the 2021 Regional Transportation Plan, these entry corridors will be a much greater focus.

2. Recommendation: Incorporate more information on the Linkages between the Tahoe Region and the North Tahoe Truckee Resort Triangle.

Thank you for this recommendation. We agree that this 2017 Regional Transportation Plan and future Tahoe regional transportation plans can better connect, support, and leverage neighboring area's projects and programs. This is something we'll continue to work on over the next four years as we plan our update for 2021. At this time, we've added the following text to page 2-4:

"This plan also supports projects and programs in adjacent regions that directly connect or indirectly serve the Lake Tahoe Region. For example, the North Lake Tahoe-Truckee Resort Triangle includes two main entry points to Lake Tahoe and encompasses North Lake Tahoe, Squaw Valley/Alpine Meadows, Northstar, and the Town of Truckee. The joint coordination, planning and development of transit, trails, and adaptive traffic management are essential in this high-use recreation area. The Truckee North Tahoe Transportation Management Association

(TNT/TMA) provides a forum for collaboration among the public and private sectors to improve mobility in the Resort Triangle and beyond, including connections to Reno/Sparks and the Truckee Meadows. Other adjacent communities and regions are collaborating to improve access to and from Lake Tahoe, along highway corridors and in the backcountry. Examples include Carson City's plan to construct a single-track trail that will connect users from Carson to the Tahoe Rim Trail near Spooner Summit, and Douglas County's Pony Express Trail intended to connect the Carson Valley with Lake Tahoe in an area near Kingsbury Grade. These projects will provide additional non-highway access to recreation and increase safety by providing separated active transportation options for access to Lake Tahoe from neighboring communities."

3. Recommendation: Increased coordination with the Town of Truckee

Thank you for this recommendation. We've added additional text to encourage and highlight continued and robust partnership with the Town of Truckee. Please also see Attachment A, TRPA's response to the Town of Truckee's comments where we explain our rationale and intention for illustrating mobility hubs in the Truckee area.

New text has been added to page 2-5, which reads:

"Local Governments

This plan reflects collaboration with Washoe, Douglas, Placer, and El Dorado counties, Carson City, and the City of South Lake Tahoe to align transportation policies and deliver capital improvement programs. Additionally, Placer County, Town of Truckee and Washoe Regional Transportation Commission jointly fund Tahoe Truckee Area Regional Transit on the North shore and these services and funding mechanisms are included on the project lists and within the reasonably foreseeable revenue sources. As regional partners continue to broaden their work beyond traditional boundaries, coordination with the Town of Truckee is vital."

4. Recommendation: Increase coordination with TNT / TMA.

We very much appreciate TNT / TMA's partnership in delivering and advertising efficient, customer oriented, and innovative transportation options. We also hope to work closely with TNT / TMA as we update and deliver transportation management programs. We look forward to this partnership.

5. Clarification Request: South Shore Water Taxi Service vs. North Shore Water Taxi Service.

These two projects are Tahoe Transportation District (TTD) led projects. During the development of the regional transportation plan project list, TTD requested the South shore service be included on the constrained list if feasible, and the North shore service be included on the unconstrained list. Our understanding is the South Shore Water Taxi Service would be a public private partnership requiring much less cost to deliver and as an appropriate phased approach to complimenting the crosslake ferry service. The North shore service may require larger scale funding and capacity that the TTD and TRPA at this time, does not see feasible with existing funding sources. However, as we discussed, this is a good project for the various partners to collaborate on to ensure an appropriate phased or bundled approach for delivery of services. TRPA would be happy to facilitate this discussion amongst the various partners, as the ferry service gets closer to being delivered.

6. Support: Must Think Beyond Traditional Sources of Funding

Thank you for supporting our Governing Board's Funding Task Force which plans to look at various funding mechanisms to better support and deliver the transit, trails, and technology projects and programs located within this plan. We welcome TNT / TMA's partnership.

TRPA appreciates the TNT / TMA's comments, partnership, and support for the 2017 Regional Transportation Plan and looks forward to our continued partnership.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency



March 20, 2017

Ms. Morgan Beryl
Senior Transportation Planner
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

Re: Comments on Linking Tahoe 2017, the Regional Transportation Plan

Dear Morgan:

Thank you for your diligent efforts to advance and complete the **Linking Tahoe Regional Transportation Plan (RTP)**. Following our review and discussions, these comments have been developed and submitted on behalf of the Board of Directors and members of the Truckee North Tahoe Transportation Management Association (TNT/TMA).

We appreciate this RTP as setting the framework and foundation for an essential acceleration of transportation improvements in the coming years. The plan provides a timely identification of emerging trends in transportation and information technologies and the need for more sophisticated transportation systems management. The data on travel behavior is of great interest and we understand why the RTP focuses on the "Discover Tahoe" travel pattern. The summary of corridor planning is also of interest ("the Bundled Approach") because it examines the full range of needs and multi-modal options for each corridor, although, unfortunately, the I-80 corridor linkage is missing from the summary. **We request it be added.** Linking Tahoe 2017 has heightened our eagerness to review the upcoming plans we understand will provide more project-level detail and implementation strategies, including the Lake Tahoe Basin Transit Master Plan and the Transportation Corridor Plan.

From our perspective, dealing daily with transit and mobility issues in the Truckee North Tahoe region, **we urge Linking Tahoe to incorporate more information about the linkages between the Tahoe Basin and the North Lake Tahoe-Truckee "Resort Triangle."** The two major Tahoe Basin transportation corridors that connect the Tahoe Basin with Interstate 80 are in the Resort Triangle. In 2016, Placer County and the Town of Truckee rolled out the new TART brand and logo designed to help the public understand that TART is a coordinated and accountable transit system throughout the Resort Triangle. Every organization and entity involved has been working in support of efforts to increase transit service in the Triangle. Although Placer County's Measure M sales tax proposal failed last November, we have collectively been exploring other funding sources so we can continue to improve the frequency and efficiency of service.

As one of our partners, the Town of Truckee is currently updating its transit plan and approach to transportation challenges. **Now is the time for TRPA to more actively engage with the Town of Truckee. The TNT/TMA can help facilitate this dialogue.**

As one example, Town planners know the existing Truckee Depot, their main hub for transit connectivity, sits in the middle of busy downtown Truckee and is at capacity for the ingress and egress of transit vehicles. The RTP map in Figure 1.3 on page 1-10 shows three potential Transit/Park and Ride Facilities in the Truckee area. That being said, we are not aware of any direct conversation between TRPA and Truckee planners about where one or more future “mobility hubs” may be located or even if the Town considers these to be a viable option. **Please include more text in appropriate section(s) of the RTP that describes the importance of greater collaboration and coordination with the Town of Truckee.** We see this cooperative planning as vital to an improved transportation network not only in the Resort Triangle, but also in the greater Lake Tahoe region.

We also see additional opportunities for TRPA to increase coordination with the TNT/TMA on the North Shore. For example, we see a South Shore Water Taxi Pilot Project listed under Transit (Constrained List - and with an EIP Project Number) and referenced under “Ferry” on page 1-8. Why is a “North Shore water tax service” shown as “remaining an unfunded need”?

Funding. The RTP states (Page 4-2) “Responding fully to the impacts of expected population growth in major metropolitan areas surrounding the Lake Tahoe Region and increased annual visitation from those areas will need new sources of funds above the levels identified by the constrained project list in the 2017 Regional Transportation Plan.” We were heartened to hear that the TRPA Governing Board began a candid conversation about options for pursuing a much greater level of funding for transit and mobility at its 2017 strategic planning retreat February 23. We must proactively think beyond the typical traditional sources of sales tax and transient occupancy tax. We concur that the States of California and Nevada must be involved and help provide bold leadership in the discussion and action critical to the future of transportation and mobility in the greater Lake Tahoe region. **The TNT/TMA is prepared to participate in the dialogue that must lead to action (new funding sources) in advance of developing the next Regional Transportation Plan, scheduled for 2021.**

Thank you for the opportunity to provide these comments on the draft Linking Tahoe 2017 Regional Transportation Plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jaime Wright".

Jaime Wright
Executive Director
Truckee North Tahoe Transportation Management Association

cc: Members, TNT/TMA Board of Directors

Mr. Steve Teshara, Principal, Sustainable Community Advocates, TMA Planning Consultant

Mr. Carl Hasty, District Manager, Tahoe Transportation District

Hi Garrett:

Thanks so much for your comments on the draft 2017 Regional Transportation Plan. I've addressed your comments below in red. Please feel free to get in touch if you'd like to discuss further.

Best,

Morgan Beryl
Senior Transportation Planner
775-589-5208
mberyl@trpa.org



From: Villanueva, Garrett -FS [<mailto:gvillanueva@fs.fed.us>]
Sent: Thursday, March 16, 2017 1:13 PM
To: Morgan Beryl <mberyl@trpa.org>
Cc: Gabor, Michael -FS <mgabor@fs.fed.us>; Quinn, Jacob M -FS <jmquinn@fs.fed.us>
Subject: Transportation Plan Comments

Hi Morgan,

It has been awhile since I have spoken with you and I am still tracking what is going on here in Tahoe (and I still live here). I have a few general comments that I would like to share regarding the plan...

1. Nice work, the plan reads well and has very nice graphics.
Thanks!
2. There are not timelines associated with goals. Timelines are essential to define sustainability. Assigning a temporal component and marker indicators to define how the community is meeting sustainability is important otherwise we continue to use sustainability as a buzz word and nothing more.

We have many performance measures that we are reporting on and in the process of updating, located in Chapter 5 and further discussed in Appendix G. The Regional Plan performance measures also provide target timelines, and we "report out" on the transportation specific ones. Also, if you haven't already, please check out www.ltinfo.org. We've created this website as a data clearinghouse and as a way to "report out" on how we are doing in meeting our goals. We are still developing new parts of Ltinfo, which will include a transportation dashboard. Chapter 5 discusses this in detail as well.

3. Trail connectivity does not mention the 350 miles of National Forest System Trails or the 250 miles of National Forest System Roads. This 600 miles of routes are National Forest Transportation System some of which are eligible for Federal Land Access Program and Federal Land Transportation Program funding. The Forest Service is at the core of many partnerships and projects involving transportation and the Forest Service is the largest federal agency and

largest land manager at the lake. Kind of bigly. The Pope/Baldwin Bike path is a great example of a trail that provides alternative transportation options to high use recreation sites (also NF sites).

Thanks for this information. I've added to page 3-17 under the existing trails section.

4. Single track sidewalks or non-surfaced trails within roadway right of ways are an important affordable consideration for our community. Affordability is important if we hope to push alternatives to the automobile within a meaningful timeframe. We simply don't and won't have the capital needed to establish paved paths or sidewalks everywhere they are needed, however, preserving or creating a native surface route/corridor adjacent to roadways is an important consideration to secure and preserve access now. This would include dedicating space adjacent to roadways that is free of utilities, curbs and other barriers. Along Al Tahoe in front of Bijou Community Park and Johnson road are examples where a single track sidewalk is evolving but utilities and roadway prohibit establishment.

You are making some great points here. We touch on this in the Active Transportation Plan a bit, could probably include a more robust discussion. I'll keep this in mind when we update the Active Transportation Plan.

At a smaller and more specific level, I noticed that at the intro to the goals section there is a statement about providing a first class transportation system. I would suggest eliminating wording that suggests we would operate at a level higher than other communities or first-class. After this winter, I'm guessing it will be several years before the pavement damage is repaired and much of that damage may also be tied to the vast accumulation of deferred maintenance of pavement. In addition many of our roadways in SLT weren't constructed with road base, leading to the need to reconstruct roadways. I hope we continue to consider the examples like Al Tahoe which has 3 lanes at 40mph that goes into 5 lanes at 25 mph to find opportunities to reduce the road, reduce future maintenance and convert our town to a bikeable and walkable community.

Thank you for this comment. The vision was developed through a multi-stakeholder technical advisory committee and formulated to reflect public feedback.

Thanks for your dedication and diligent work!

Kind Regards,

Garrett



Garrett Villanueva
Regional Trail Program Manager

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DATE: April 11, 2017
TO: Chairman Neil Mortimer, Washoe Tribe of Nevada and California
FROM: TRPA Staff
RE: Response to Washoe Tribe of Nevada and California Comments on Linking
Tahoe: Regional Transportation Plan/Sustainable Communities Strategy (Draft)

Dear Chairman Mortimer:

Thank you for meeting with TRPA staff on March 27, 2017 to discuss the Washoe Tribe of Nevada and California's (the Washoe Tribe) comments on the draft 2017 Regional Transportation Plan/Sustainable Communities Strategy (2017 RTP/SCS). TRPA appreciates the opportunity to meet in person and discuss the various issues related to transportation at Lake Tahoe. Based on our conversation, we have updated the plan and environmental document.

1. Recommendation: Additional Description on Washoe Tribe

The following text was added to Chapter 2, page 2-6:

“Washoe Tribe of California and Nevada:

The Washoe Tribe of Nevada and California is an important partner in transportation planning at Lake Tahoe, as Lake Tahoe is the traditional center of the Washoe world. The tribe owns and manages land in the Region, such as Meeks Bay Resort and Marina and Cave Rock on the East Shore of the lake that serves as a transportation gateway into Lake Tahoe. The Washoe are the original inhabitants of the Lake Tahoe Region. Transportation planning staff meet one-on-one with the Washoe Tribe to share information and updates on transportation projects and issues. Tribal staff actively participated on the project development team for the Corridor Connection Plan and the 2017 Regional Transportation Plan. The Tribe also serves on project development teams for specific projects, such as the Nevada Stateline to Stateline Bikeway. The Tribe is a voting member of the Tahoe Transportation Commission (TTC) and the Advisory Planning Commission (APC), which are the advisory bodies to TRPA/TMPO. Regular communication between the Tribe and TRPA serve as another method for both parties to discuss any other issues that may arise through formal consultation.”

2. Recommendation: Include clearer cultural resource information and existing guidelines in Environmental Document, Cultural Section.

The following text has been added to ensure consistency in following requirements for protection of cultural resources:

“The project development and site design for all projects would include an inventory of cultural resources and development of mitigation measures, if necessary, in consultation with the California and Nevada State Offices of Historic Preservation (SHPO) as well as the Washoe

Tribe. Projects would be subject to the provisions to protect historic resources as described in Chapter 67 of the TRPA Code of Ordinances. Section 67.3 also includes protections related to discovery of resources. If the project is located on federal or tribal lands, protections under the Native American Graves Protection and Repatriation Act (NAGPRA) would also apply. A site survey shall be performed by a qualified archaeologist within project areas with known or newly discovered sites of cultural and/or historic significance prior to any TRPA project approval. TRPA shall consult with the Washoe Tribe on all site surveys for the purpose of determining the presence of Washoe sites. If resources are discovered and deemed significant, a resource protection plan would be required.

The Washoe Tribe of Nevada and California is an important partner in transportation planning at Lake Tahoe, as Lake Tahoe is the traditional center of the Washoe world. The tribe owns and manages land in the Region, such as Meeks Bay Resort and Marina and Cave Rock on the East Shore of the lake that serves as a transportation gateway into Lake Tahoe. The Washoe are the original inhabitants of the Lake Tahoe Region. The Tribe and TRPA have acknowledged the mutual benefit of a formalized process for communication for land, transportation, and resource management decision making and other governmental relations. Both parties have a strong interest in the protection of social, biological, and tribal cultural resources in the Lake Tahoe Region and recognize that collaboration and cooperation is the best method to achieve these goals.

Tribal consultation, if requested as provided in Public Resources Code Section 21080.3.1, must begin prior to release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. Information provided through tribal consultation may inform the lead agency's assessment as to whether tribal cultural resources are present, and the significance of any potential impacts to such resources. Prior to beginning consultation, lead agencies may request information from the Native American Heritage Commission regarding its Sacred Lands File, per Public Resources Code sections 5097.9 and 5097.94, as well as the California Historical Resources Information System administered by the California Office of Historic Preservation. The Washoe Tribe was consulted throughout the planning process as described in the 2017 RTP/SCS Appendix C Public Participation, *Consultation and Cooperation*.

Projects that are new for the 2017 plan include the Tahoe Valley Greenbelt, and Viking Way to South Wye bike trail projects; trailhead improvements that include parking management systems and increased transit access at Meeks Bay and Emerald Bay; and a roundabout in Meyers at the intersection of SR 89 and U.S. Highway 50, Pioneer Trail and U.S. Highway 50, and SR 267 and SR 28. Other projects include safety improvements such as additions of sidewalks and intersection upgrades generally within existing urbanized area and road right of ways. At least one of the new projects involves changes at a known historic site, such as the USFS project upgrades to the Visitor Center at the Tallac Historic Site.”

3. Request: Additional Information on current practices related to cultural resource monitoring.

TRPA staff followed-up with our current planning department who produce permits for projects that may impact cultural resources. Shannon Friedman (sfriedman@trpa.org) and Jennifer Self (jself@trpa.org) provided the following information.

- For Environmental Improvement Program projects, cultural resources are typically analyzed during the environmental stage. We also put a condition in most permits. If it is known to be a site of potential significance then we will require an archaeologist on-site

during times of construction within the sensitive areas. Sample language typically found in permits is: “If artifacts, archaeological soils, or unusual amounts of bone or shell are uncovered during the construction activities, all work in the area will be stopped and a qualified archaeologist will be immediately contacted for on-site consultation.”

- For regular current planning permitted projects, the permit language or any special conditions would depend on whether or not there are known archaeological or historical resources on the site or immediate vicinity. For *known*, the applicant would be required to prepare a resource recovery or resource protection plan. The content and requirements for the plan would vary based on the significance and type of resource(s). For *unknown*, (i.e. none documented but in an area where discovery of resources may be likely) we would use standard language similar to the sample provided above.

TRPA appreciates meeting with the Washoe Tribe and looks forward to continuing our partnership on finalizing and approving our interagency agreement. Additionally, we look forward to working with Chairman Mortimer and his team on planning and delivering the many important projects located within the draft 2017 Regional Transportation Plan.

Sincerely,

Morgan Beryl, Senior Transportation Planner
Tahoe Regional Planning Agency