



Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

October 21, 2020

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

Dear Ms. Cremeen:

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

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

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

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

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

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

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

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

Sincerely,



Judith Tornese,
President

Contents

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

Existing capacity-based VMT standard and TRPA’s Role

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

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

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

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

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

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

Day-visitor impacts

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

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

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

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

¹ RTP, p. 245

² RTP, p. 245

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

The overall fact is that 42% of the visitors to the North Tahoe region were day-only visitors. This impact is not reflected by the RTP, nor do the RTP programs illustrate how the impacts of day-only visitors will be adequately reduced. Contrary to TRPA's belief that the agency has no ability to control visitor traffic,³ we believe there are measures available that can be employed to further disincentivize passenger vehicle travel into the basin (especially day-only use) and to provide adequate funding for necessary transportation projects and transit, including but not limited to a basin entry fee (if developed and implemented appropriately and fairly), Congestion-Management Pricing⁴, and significant improvements in transit access to recreation in the Basin. This would also allow roadways users to pay their fair share toward mitigating vehicle impacts in the Basin, a burden which is now borne primarily by the basin's 55,000 residents (see additional discussion of funding below).

Proposed VMT standard allows uncapped VMT growth

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

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

Uncapped VMT growth: Other Environmental Impacts

Water Quality:

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

“Water Quality

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

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

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

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

³ See 8/27/2020 FOWS comments to TTAC.

⁴ Seattle Congestion Pricing Study. Phase 1 Summary Report. Seattle Department of Transportation. May 2019.

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

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

Noise:

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

“Noise

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

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

Uncapped VMT growth: Public Health and Safety

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

Emergency Evacuations:

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

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

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

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

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

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

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

Emergency Response/Access:

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

Inadequate funding sources:

Historic funding levels are inadequate and uncertain:

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

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

Funding from fuel taxes will decrease:

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

⁹ P. 223

¹⁰ Appendix C, p. 154

Excess cost burden placed on residents:

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

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

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

Failure to consider new relevant information in IEC:

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

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

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

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

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

¹¹ https://cbf674e7-b8cd-47a2-883f-3f9e0b2e80de.filesusr.com/ugd/4e7b4c_f8a0668d25ac4e2f94f21b3b8a69476a.pptx?dn=ListeningSessionPresentationTier3_Final

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

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

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

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

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

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

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

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

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

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

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

Peak visitation and “Annual Averages”:

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

¹⁵ IEC, p. 200

¹⁶ 2011 Threshold Evaluation Report, p. 3-59

¹⁷ SR 89 Corridor Management Plan, p. 18

¹⁸ https://mountainhousingcouncil.files.wordpress.com/2019/03/mhcstrwhitepaper_final.pdf

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

Impacts to beneficial redevelopment projects:

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



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

August 27, 2020

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

Dear Dan:

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

VMT "Absolute" vs. "Efficiency" Standard

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

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

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

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

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

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

Policy Considerations and Recommendations

VMT Standard

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

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

Project-level Transportation Impact Assessment

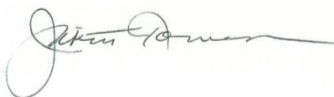
1. Dynamic Testing – It is unclear what the proposed ‘case studies’ would be. For example, are these approved projects, and/or projects currently being planned? Would this entail some level of model ‘calibration,’ or would it be more focused on providing future inputs to the model?
2. VMT Metrics – The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

Time for meeting preparation

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

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

Sincerely,



Judith Tornese,
President



Jennifer Quashnick,
Conservation Consultant