



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

December 9, 2020

Subject: VMT comments for 12/10 TTAC meeting

Dear Dan:

The Friends of the West Shore (FOWS) appreciates the amount of work staff has put into the information for the 12/10 Tahoe Transportation Advisory Council (TTAC). FOWS provides these comments specifically regarding the proposed replacement of the absolute (**capacity-based**) VMT standard with the per capita standard. While we have repeatedly expressed our concerns with this change in the past, there has been no notable discussion with the TTAC, the RPIC, or the general public, regarding the significance of this change. At the August TTAC meeting, Mr. Bill Yeates agreed the TTAC was not the appropriate forum to discuss TRPA's role and the Compact's requirements to establish threshold carrying **capacities**, however this discussion has not occurred elsewhere. Rather, the proposed replacement of the absolute VMT standard, which reflects a carrying capacity, with the per-capita standard, which provides no such capacity, is being moved forward as if the decision were already made. This change, as proposed, will result in weaker environmental protections because the per-capita standard would allow absolute VMT to increase *without any maximum limit*.

When queried about the significance of the changes between these two VMT metrics in public meetings, responses have failed to provide direct answers, sometimes stating that the agency plans to "keep the regional VMT standard" without distinguishing between the different metrics. The difference between the absolute versus per-capita metrics and the consequences of deletion of the absolute VMT standard must be clearly explained and documented so the public and decision-makers understand the significance of this change.

The materials for the 12/20 TTAC meeting include a report¹ that discusses the reductions in NOx emissions as the basis for eliminating the existing absolute VMT, but fails to discuss the other impacts of absolute VMT, including water quality (e.g. the increased particulates in runoff associated with roadway wear and tear, brake wear, etc. and particulates that are resuspended by tires and deposited into the lake and its tributaries) and public health and safety (e.g. VMT impacts to emergency access, especially important as wildfire danger continues to increase each year). Rather than eliminate the existing absolute VMT standard, we should be examining the water quality, public safety, and other impacts of absolute VMT and developing an appropriate **capacity-based** absolute VMT standard based on that information.

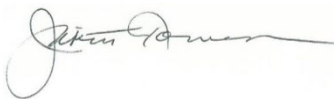
In addition, by setting up the TTAC meetings so that the TTAC is tasked to comment only on the per-capita VMT proposal, the TTAC is not being provided the chance to address the questions and concerns surrounding deletion of the absolute VMT standard or to consider alternative targets for absolute VMT. This may also lead to the misconception that the TTAC 'endorses' deletion of the existing absolute

¹ "VMT Threshold Update: Target Setting and Implementation"

standard simply because the TTAC provided feedback to develop the per-capita standard. In order to ensure the Compact's requirements to meet environmental threshold carrying capacities are met, including water quality and clarity standards, **we request the TRPA table the deletion of the existing absolute VMT standard unless and until it has been given adequate discussion among technical experts, decision-makers, and the public.**

Unfortunately, Jennifer will not be able to attend due to a schedule conflict. Judi will attend for the VMT portion of the discussion. Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,



Judith Tornese,
President



Jennifer Quashnick,
Conservation Consultant