August 12, 2008

Tahoe Regional Planning Agency
PO Box 5310
Stateline, Nevada 89449

RE: Additional Comments on the Draft Mobility 2030 – Lake Tahoe Regional Transportation Plan

To Tahoe Regional Planning Agency:

The League to Save Lake Tahoe is submitting these additional comments on the Draft Lake Tahoe Regional Transportation Plan document on the basis that a mitigated negative declaration is insufficient and needs a higher level of environmental review. This conclusion is a result of the following inadequacies:

1. potential substantial environmental impacts, especially considering that transportation is the primary culprit for air quality and water quality degradation in the Basin
2. charts/diagrams that accurately depict Lake Tahoe transportation and air quality trends are either absent or misleading

In addition, the document currently lacks the specific quantitative analysis for threshold standard attainment and maintenance plans. The TMPO and the TTD need to direct the next twenty years of transportation changes in a manner that assists TRPA in attainment and maintenance of the thresholds.

Chapter 1

Overview

Since page 3 of this RTP states, “We expect the inclusion of these policies into the TRPA regional plan update when it is sent out for analysis later this year” the policies contained throughout the RTP need to reflect and be consistent with the TRPA Compact to:

1. Achieve and maintain the environmental thresholds (especially with regards to air quality and water quality which have direct relationships to impacts from transportation)
2. 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
3. To reduce to the extent of feasible air pollution which is caused by motor vehicles (sources beyond the private automobile: buses, trucks, waterborne transit, aircraft, etc…)

Based upon these objectives, the emphasis on transportation projects needs to be on improving air quality, water quality, and other related thresholds; in part by decreasing the use and dependency of the automobile, but at the same time, utilizing alternative transportation modes that are more efficient and actually reduce air pollution to the extent feasible within a reasonable timeline and take into account such factors as environmental benefits and best available technology. A good measure that needs to be used to compare these different modes is *emissions per person per mile*. Getting a person out of a private automobile and into a more highly polluting mode of transport was clearly not the intent of the Compact (i.e. a boat can be orders of magnitude more polluting than a typical car). Priority needs to go to projects that result in the lowest *emissions per person per mile* calculations and furthermore the corresponding reduction in air pollution needs to be the goal of any project in the Basin.

The RTP document needs to include graphs and diagrams that depict environmental thresholds standard data and trends (air quality, water quality, etc…) that relate to transportation, such as emission inventories (NO_x, $PM_{2.5}$, PM_{10}, CO, ozone for both 8 hour and 1 hour concentrations, etc…) from different sources (on-road vehicles, off-road vehicles, watercraft, aircraft, etc…). In addition, AB32 should be addressed by providing greenhouse gas emission inventories with a goal of net reduction.

Background

This section describes the objects outlined in Article V of the Compact. These goals need to be better explicitly reflected in the RTP itself.

Inter-agency Air Quality Conformity Consultation

Although the Federal Transportation Conformity Rule is addressed, this conformity analysis which is based upon Federal standards which are not as stringent as those required by the states of California and/or Nevada and the TRPA threshold standards. Current attainment status of the environmental thresholds needs to be addressed with a quantification of the estimated improvement for each applicable standard. Ozone has been out of attainment for years. Considering its deleterious effects on human health, wildlife, and vegetation (which has the associated effect of promoting wildfire risk), the RTP needs a substantive plan for achieving compliance with this standard.

Visitor Overnight Occupancies

For the California South Shore Rooms Rented 1994-2006 chart, does this include all of South Lake Tahoe (96150) or is it confined to just the area between Ski Run and Stateline, for example? Furthermore, was 1994 an unusually high-occupancy year and how did 1994 compare to years previous? During the same or similar time spans, how has lodging facility occupancy been in other parts of the Basin (Tahoe City, Kings Beach, etc…)? Please provide those charts. Another chart is needed that depicts the average occupancy for North Shore and the Lake Tahoe Basin in general. What are the trends for different seasons and during the busiest times of the year (winter, summer)? Although, occupancy for Stateline Nevada hotel rooms did decline from 2004 until 2006, the trend line clearly indicates an *increase* from the mid 1990's until current.

Traffic volumes

For Figures 1.9 and 1.10, what data was used to prepare these diagrams? What are the Peak Month Traffic Volumes 1974-2006 for other busy months of the year (December, January, July, etc…)? Although the statement "2005 Peak Month Traffic Volumes (August) within the Tahoe Region have fallen 14.6 percent from the highest reported levels recorded in 1986" is technically correct, it characterizes a more dramatic decrease in traffic volume than trends would indicate, as the traffic volume in 1986 was unusually high. Instead, 2005 traffic volumes need to be compared with an average traffic volume for a 10-20 year moving average. The same type of analysis is needed for Figure 1.10.

Both Figure 1.11 and 1.12 use percentage variation to show monthly and daily average annual traffic volume. Please provide graphs that show actual traffic counts.

Similarly, actual traffic volumes for Basin entry points (Highway 50, State Route 267, etc…) are essential to include in this document as data indicates that they are **increasing**! This data needs to be charted for individual peak months (during winter and summer) and on an annual basis. All the data from the different entry points can be combined into one chart if color coded.

Vehicle Miles Traveled (VMT)

Figure 1.13 is based upon on an annual percentage increase-decrease. Instead this chart needs to provide actual vehicle count data and needs to depict individual peak months (during winter and summer).

Transit Ridership

Separate charts need to be provided that show ridership in South Shore and North Shore. Also ridership should be differentiated between services, such as ski shuttle, trolley, casino shuttles, as well as BlueGo and TART. Another table needs to show how transit capacity (more or less buses, trolleys, etc…) has changed in the same time span.

Ridership in the Basin needs to be graphically represented as a function of both ridership numbers and *ridership capacity*.

The data in Figures 1.16, 1.17, and 1.18 needs to be represented graphically.

Chapter 2: Goals and Policies

To be consistent with the Compact, this chapter needs to use the term just "automobile" instead of "private automobile" which is too limiting.

The Compact

The section needs to include the language from the Compact: "To reduce to the extent of feasible air pollution which is caused by motor vehicles".

Desired Conditions: Environmental Impacts

Consistent with the environmental thresholds goals in the Compact, the TMPO needs to take an active role in providing quantifiable improvements in applicable transportation related thresholds, such as air and water quality standards. The language in this section needs to be strengthened: TMPO will coordinate with TRPA resource managers to provide feedback, assist with monitoring and analysis of the data, and ensure that all environmental impacts are completely evaluated and mitigated. Furthermore, projects need to demonstrate environmental threshold improvement.

Pedestrian and Transit-Oriented Development (PTOD)

The League recommends that the Regional Transportation Plan specifically directs that all transportation planning, projects, and developments in the Tahoe Basin consider the environmental feasibility of incorporating Class II bikeway facilities as a means of enhancing non-motorized forms of transportation. A Class II bikeway facility provides a striped lane for one-way bike travel on a street or highway. The purpose of Class II bikeways should be to improve conditions for bicyclists and to connect existing bikeway corridors. Class II bikeways not only increase rider safety on the road, but also promote commuting and recreational uses of non-motorized forms of transportation.

The environmental feasibility of incorporating Class II bikeways into transportation projects should focus not only on soil coverage and erosion impacts, but topography concerns as well. For example, certain areas of Highway 89 between Meeks Bay and Cascade Properties have a topography that limits the feasibility of Class II bikeways both economically and environmentally. In these areas of the roadway the focus should be on improving signage of Class III bikeways and visibility for both cyclists and motorists. Another option for increasing and promoting bicycling is to provide more public transportation options for cyclists in areas where Class II bikeways are not feasible. For example, allowing bicycle racks on the public shuttles and trolleys that connect the West

Shore to the South Shore could potentially increase both ridership of the public transportation system and non-motorized forms of transportation.

In addition to the above recommendation to consider Class II bikeways into transportation projects, we also suggest that the Regional Transportation Plan includes the implementation of a comprehensive feasibility study of potential Class I and Class II bikeway sites throughout the transportation system of the Tahoe Basin. The feasibility of bikeways should include not only the safety and economic issues, but the environmental impacts as well. Identifying all feasible sites in the Tahoe Basin would help to streamline the planning process and allow for more efficient use of planning resources.

The Desired Conditions section needs to include "attainment and maintenance of the environmental thresholds."

Pedestrian & Bicycle Friendly

The language in this section needs to be more direct and less vague. For example, the Goal states "Design an atmosphere that encourages bicycle and pedestrian usage…" Instead, this should read "Design the infrastructure that facilitates bicycle and pedestrian usage…" In the Policies section D, the phrase "shall promote" needs to be strengthened. Similarly, section E uses the phase "show consideration of" and needs to read "show inclusion of…"

Mass Transit

The Goal is confusing. What exactly is "environmentally conscious mass transit"?

The Policies need to reflect the need for reducing *emissions per person per mile*, and improving the environmental thresholds in the Basin. The benefits of public transportation in comparison with individual private automobile transportation need to be examined with each project. Mass transit vehicles that are utilizing older technology with low ridership have the potential to be far more polluting than the cars that they are replacing. Therefore, mass transit equipment needs to be selected based upon the best available technology, alternative fuel options, and realistic ridership estimates that ensure a reduction in emissions for environmental threshold attainment. From CARB data, a typical 2004-2006 diesel bus produces 30-250 times more NO_x and significant amounts more particulate matter (PM) than a traditional 2005 SUV or Subaru Outback. It is also noted that NO_x is a precursor for ozone production and is a threshold standard that is currently out of attainment. Any negative impacts associated with mass transit projects need to be fully mitigated.

Intra-Intra Regional Transportation

The policy critiques summarized in the Mass Transit section also apply here, with regards to emphasizing the need that these projects positively improve the environmental

thresholds, demonstrate an *emissions per person per mile* benefit, and fully mitigate any negative impacts.

Section F refers to "clean waterborne transportation systems as an alternative to automobile travel in the Region." What does "clean" mean here? Any waterborne transit project should only consider the best available technology to minimize emissions to the maximum extent feasible and demonstrate a net environmental benefit, especially in regards to air quality threshold standards. Boats typically are a magnitude less efficient in terms of gas mileage and are far less technologically advanced in comparison with automobiles, therefore are far more polluting. A typical speed boat produces a thousand times more pollutants (oxides of nitrogen and hydrocarbons) per hour of operation than a Subaru Outback. In other words for a given hour, 1000 or more Subaru Outbacks would need to stop driving in the Basin to compensate for the pollutants (oxides of nitrogen and hydrocarbons) discharged during the operation of speed boat. *Emissions per person per mile* and/or *emissions per person per hour* need to demonstrate that waterborne transit is actually a viable alternative for automobile travel in terms of actually reducing emissions. Even a solar power-assisted hybrid boat with catalytic converter technology is unlikely to exhibit a reduction in *emissions per person per hour* in comparison with a Subaru Outback, for instance. Without continued technological improvements, waterborne transit is likely not a viable alternative mode of transportation consistent with threshold attainment and maintenance at this time.

Regional Roadways

The Goal and Policies need to add phasing about improving environmental conditions such as water quality, air quality, noise, recreation, and other applicable thresholds.

Aviation

The goal mentions "without compromising environmental thresholds". This needs to rewritten to "improving environmental thresholds, especially with regards to air quality". Aircraft are extremely polluting in comparison to cars. A 50 seat Bombardier CRJ200 jet airplane produces the same amount of pollutants (oxides of nitrogen and hydrocarbons) during a single takeoff and landing as a Subaru Outback produces during over 100, 000 miles of operation.

To help facilitate aircraft use outside *instead* of within the Basin to decrease the substantial environmental impacts to air quality, the connectivity between both the Reno and Sacramento Airports with Lake Tahoe destinations needs to be improved. The ability for visitors to get from Reno-Tahoe International to Lake Tahoe exclusive of private automobile is extremely limited, while the ability of visitors to travel from the Sacramento Airport to Lake Tahoe is virtually impossible without the use of a rental car.

A family of three arriving at Reno Tahoe International at 4:30 PM would have to wait over four hours for their Tahoe City bound shuttle and pay $100 for their family roundtrip ticket or they could wait at the airport for one and half hours, catch the Incline

Village bound shuttle and then wait for a TART transfer that will take them to Tahoe City. Passengers traveling from the Reno Airport to Stateline, NV would have a little more luck as the South Lake Tahoe Express typically leaves the airport every two hours.

Tourists arriving at Sacramento International wishing to reach Tahoe without a rental car would have to first find a way to the local Greyhound or Amtrak Station, take a bus or train to Truckee, CA and then use additional public transit to reach their final destination of Tahoe City, Incline Village, or South Lake Tahoe which may involve multiple bus changes.

In order to improve connectivity between Reno Tahoe International Airport and Lake Tahoe, more frequent and economical shuttle services are needed with special emphasis on enhancing the frequency of the North Shore routes. In order to create connectivity between Sacramento International Airport and Lake Tahoe, a one stop travel option needs to be established that allows passengers to arrive at the Sacramento Airport get on a bus and arrive in the Basin without the hassle of transferring. In order to encourage visitors arriving by commercial airlines from not driving rental cars into the basin they need to be provided with convenient and inexpensive options to reach their Tahoe destination.

By providing adequate transit options that utilize clean and green fleets between nearby commercial airports and Lake Tahoe destinations there will be a corresponding decrease in VMTs and improvements to the air quality threshold.

U.S. Highway 50 Pedestrian & Bicycle Improvements Project

Sidewalks need to be installed and not just in areas with limited right-of-way. The comments included in the PTOD section also apply here.

Does this project have a timeline?

U.S. Highway 50 Stateline Corridor Project

What is the timeline for this project, including estimated dates for report, environmental documents, and construction?

Fanny Bridge/SR 89 Realignment Road Improvement Project

What is the timeline for this project, including estimated dates for report, environmental documents, and construction?

State Route 28/Kings Beach Commercial Core Improvements

What is the timeline for this project, including estimated dates for report, environmental documents, and construction?

Tahoe City Transit Center

What is the timeline for this project, including estimated dates for report, environmental documents, and construction?

Lake Tahoe Waterborne Transit

The phrase "clean and green" is used to describe the innovative boating technology, yet as summarized above, boats are highly polluting in comparison to automobiles. In addition, the shoreline and landside facilities (parking lots, ticket kiosks, etc…) may have a variety of negative environmental impacts, such as increasing impervious coverage, scenic impacts, compromising fish habitat, affecting water quality, etc… The cumulative impacts from all the facilities and the watercraft need to be carefully evaluated and compared to the vehicle alternative. Motorized boats create impacts to air quality, water quality, wildlife, fisheries, and noise. All the comments from the Inter-Intra Regional Transportation section apply here as well.

What is the proposed timeline for this project, including estimated dates for report, environmental documents, costs, funding, and construction?

Aviation Enhancement Strategies

Graphs need to be included that compare costs versus revenue for the Lake Tahoe Airport (TVL). Also, a graph is needed that depicts aircraft and passenger activity.

Environmental Stormwater Strategies

A section similar to this needs to be dedicated to Air Quality Strategies considered the strong linkage between impacts to air quality and transportation in the Basin. What are the specific air quality strategies for improvement?

Mobility 2030 Project Strategy List

Projects specifically dedicated for improving air quality need to be listed.

Growth Assumptions

This section mentions that the reliability of the TransCAD model is dependent on having actual traffic volumes. There is no reference to adding the necessary automated traffic counters to validate this model. How has vehicle activity decreased when data suggests that the counts of vehicles entering the Basin have actually increased? How have vehicle counters used to measure in-Basin traffic adequate for estimating a 6.5 % reduction in VMT levels?

Appendix B: TRPA Initial Environmental Checklist

We do not concur on the following assessments of the TRPA Environmental Checklist. A number of the checklist items should be marked yes and as a result will necessitate a full scale environmental review.

Air Quality

2a. Some of the projects such as enhanced air travel, water borne transit, and road expansion, will increase air pollutant emissions substantially. This category should be labeled "yes" with regards to "substantial air pollution."

2b. Some of the projects such as enhanced air travel, water borne transit, and road expansion, will increase air pollutant emissions, thereby causing a deterioration of ambient air quality. This category should be labeled "yes" with regards to "deterioration of ambient (existing) air quality."

2c. The RTP will increase diesel fuel as result of expanded transit projects (as stated in 2e) which will create objectionable odors. This category should be labeled "yes" with regards to "the creation of objectionable odors.

2d. The expansion of air, water, and public transit will increase fuel usage and directly effect global warming and climate change. This category should be labeled "yes" with regards to "alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally."

Water Quality

3e. Current water quality mitigation efforts used today do not fully mitigate for pollutants and do not meet discharge standards. Some of the proposed projects will result in polluted runoff that will not be able to be fully mitigated. Therefore, this category should be labeled either "yes" or "data insufficient" for "discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved oxygen, and turbidity."

3i. The program will be expanding coverage through such projects as the addition of parking lots which could result in additional exposure to flooding. However, this flooding risk could be reduced in appropriate catch basins are installed. This category should be marked "no, with mitigation" for "exposure of people or property to water related hazards such as flooding and/or wave action from 100-year storm occurrence or seiches."

Noise

6a. Improvements to transportation may be a source of attraction for some uses and may actually increase the number of visitors thereby impacting noise levels. This category should be marked “yes” or “data insufficient” for “increases in existing Community Noise Equivalency Levels (CNEL) beyond those permitted in the applicable Plan Area Statement, Community, Plan or Master Plan.”

Light and Glare

7a. Projects, such as the addition of new parking lots may include lighting. Standard mitigation methods are not fully effective at shielding light. Adding supplementary lighting, regardless of shielding practices, will deteriorate dark skies. This category should be labeled as “yes” for “new or modified sources of exterior lighting.”

Population

11a. The purpose of many of the projects is to concentrate development which will cause an increase in population density. This category should be labeled “yes” for “alter the location, distribution, density, or growth rate of the human population planned for the Region.

Transportation/Circulation

13a. Adding additional public transit opportunities may generate more daily vehicle trips ends if the transit system is not used in adequate numbers and ridership remains lows. This category should be labeled as “yes” or “data insufficient” for “generation of 100 or more new daily vehicle trip ends (DVTE).”

Public Services

14b. Increased aircraft and waterborne activities and increases in population densities and open public spaces will require the need for supplementary police or terrorist protection. This category should be labeled “yes” for “police protection.”

14f. Increases in various modes of transportation will require additional monitoring and governmental services. This category should be labeled “yes” for “governmental services.”

Energy

15a Increases in aircraft, waterborne activities, and public transit, plus the additional lighting needed for new public areas and parking lots will require additional fuel and energy use.

Findings of Significance

21b. Changing transportation modes may cause unintended long-term negative impacts on environmental goals. This category should be labeled "data insufficient" for "the potential to achieve short-term, to the disadvantage of long-term, environmental goal."

21c. The projects listed in the RTP document remain undefined and no substantial environmental assessment can be made with regards to their cumulative effects. This category should be labeled "data insufficient" for "impacts that are individually limited, but cumulatively considerable."

21d. The projects listed in the FTP document remain undefined, but may pose significant negative environmental impacts that may affect human beings. This category should be labeled "data insufficient" for "environmental impacts that will cause substantial adverse effects on human beings, either directly, or indirectly."

Summary

Thank you for this opportunity to provide additional comments on the Draft Lake Tahoe Regional Transportation Plan. As a result of a multitude of concerns, this document requires a higher level of environmental review.

If you have any additional questions, please contact me at 530-541-5388.

Thank you,

Carl Young
Program Director
The League to Save Lake Tahoe