



Tahoe Regional Planning Agency
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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 reevaluation/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,

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Attachment: Appendix A: TRPA Code 65.5 Employer-Based Trip Reduction Program