



Tahoe Transportation District
128 Market Street, Suite 3F
Stateline, NV 89449
Sent via email

Date: May 9, 2017
To: TTD Board of Directors, District Manager Carl Hasty
From: The League to Save Lake Tahoe

Re: Comments on Lake Tahoe Basin Transit Master Plan (Draft)

Dear Members of the Board and Mr. Hasty:

The League to Save Lake Tahoe (the “League”) commends the Tahoe Transportation District (“TTD”) staff for producing the Lake Tahoe Basin Transit Master Plan (the “Transit Plan”) in cooperation with Stantec. We support the TTD’s focus on improving transit and agree that transit is the most important vehicle for bringing about real, effective change in the Lake Tahoe Basin. We understand that this long-range planning document identifies transportation solutions that will help guide the development of a short-term transit plan. However, while the Transit Plan is intended to be a long-term visioning document, we are disappointed that it lacks coordination with the Tahoe Regional Planning Agency’s (“TRPA”) Regional Transportation Plan (the “RTP”), despite repeated assertions made by TRPA to the contrary. It also lacks project prioritization and fails to identify specific funding needs. This information will be critical for a future bi-state consultation process that will be tasked to identify funding opportunities. The following comments identify the League’s concerns with the Transit Plan and offer suggestions for improvements:

I. The League is concerned by the apparent lack of coordination between the TTD and TRPA with the Transit Plan and RTP. There must be formalized coordination between these agencies for successful implementation of transportation solutions.

II. The League requests clarification on how Transit Plan proposals can be implemented. Identifying how private-public partnerships will actually work needs to be discussed further.

III. The Transit Plan cost analysis is overly complicated and undermines successful implementation of the plan. There must be prioritization of projects identifying funding needs, specifically the identification of small projects that can be implemented immediately.

IV. The Transit Plan fails to establish a regional transit connection between the north shore and the south shore. There is no actual regional long-range transit vision.

V. Recommendations from the League.

Introduction

Traffic and congestion are long-standing problems within the Lake Tahoe region. More private vehicles on the roads contributes to environmental degradation through increased fine sediment to Lake Tahoe and increased nitrogen into the air. With changes to economic and weather conditions, the winter of 2016 demonstrated how significant congestion can be, with cars stuck in traffic for hours when entering and leaving the region. TRPA and TTD are charged with transportation planning and implementation, respectively. While the TRPA and TTD have taken the first steps in identifying solutions in the RTP and Transit Plan, how these plans will actually resolve transportation problems is yet to be clarified.

Over the past two years, the League has repeatedly requested identification of prioritized project lists and associated funding needs from both agencies. This information will allow our organization to not only advocate for sustainable funding on a federal and local level, but will also be an essential foundation for a future bi-state consultation team. At TRPA's 2017 annual Governing Board retreat, the Board recognized the need to establish such a bi-state team through California's Secretary of Natural Resources and Nevada's Division of Environmental Protection in order to identify sustainable funding opportunities. Prioritized project lists are essential for this consultation process.

We urge the TTD to consider formalized coordination with TRPA to ensure the successful implementation of the RTP and the Transit Plan. In addition, we request clarification on the Transit Plan and the inclusion of other potential solutions.

I. The League is concerned by the apparent lack of coordination between the TTD and TRPA with the Transit Plan and RTP. There must be formalized coordination between these agencies for successful implementation of transportation solutions.

Both TRPA and the TTD have repeatedly affirmed that the Transit Plan will implement the overarching goals of the RTP, but in reality, the Transit Plan is an entirely independent document. While the RTP (which has now been approved) references the Transit Plan several times, the Transit Plan itself contains little reference, if at all to the RTP and associated goals. This is alarming, as the TTD is responsible for implementing the RTP's goals. Not only is there a lack of coordination between the planning documents, but there are clear contradictions.

A cornerstone of the RTP is free transit, but there is no mention of this in the Transit Plan. The Transit Plan does not discuss free transit within any scenario and relies on farebox revenue for implementation.¹ Additionally, the Transit Plan encourages the management of vehicle traffic and parking in Emerald Bay, but fails to coordinate or discuss the Emerald Pay pilot project referenced in the RTP.² The League is concerned about how this lack of coordination will ultimately impact the successful implementation of a broader transportation strategy contemplated by these plans, the upcoming TTD Corridor Plan(s) and local jurisdictions' Area Plans.

¹ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page(s)37, 133-135.

² Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page 73.

The Transit Master Plan claims that in its conception, “each of the phases included significant public and stakeholder engagement,” when in reality there was only one stakeholder meeting that did not include the public. One stakeholder meeting does not a public process make. There should be much more public involvement in developing and creating the short-term transit plan following the Transit Plan and the upcoming TTD Corridor(s) Plans. The League also strongly supports a formalized memorandum of understanding (“MOU”) between TTD and TRPA. Transportation solution and transit success can only be achieved through actual coordination of these agencies, and currently, no such coordination exists.

II. The League requests clarification on how Transit Plan proposals can be implemented. Identifying how private-public partnerships will actually work should be discussed in greater detail.

As a practical matter, it is unclear how many of the Transit Plan proposals can be implemented. While we understand this is a long-range plan meant to have long-term visioning, information on how the proposals will actually come to fruition should be included. For example, the Transit Plan repeatedly references maximizing rail service.³ It does not identify funding needs nor describe what agency involvement is needed to make this possible.

Additionally, there is a somewhat lengthy discussion regarding British Columbia ferry boats that will be used as water taxis.⁴ Implementation of this vision will require the construction of new ferry piers and terminals, particularly on the north shore, which could potentially conflict with TRPA’s current Shoreline Planning initiative. Again, the details of this initiative are not included, and there is no discussion on funding and implementation needs. Further, there is an immediate need for a functioning transit system before a water taxi system is implemented. While we applaud these concepts as a creative attempt to think outside of the box, a passenger would currently have insufficient means of getting to their destination once they get off a ferry or taxi.

The Transit Plan proposes additional parking at South Lake Tahoe’s “Y” Transit Center.⁵ This concept, again, conflicts with RTP policies aimed at reducing parking in the Lake Tahoe Basin. The League is in favor of parking for transit. However, there must be clarification on this proposal. The TTD should not encourage additional parking unless it is tied to reducing private automobile dependence.

The Transit Plan also relies heavily on partnerships with private entities. The plan references shared parking lots with Heavenly, using commercial properties such as Squaw, Northstar, Diamond Peak as transit centers, and repurposing the Incline Elementary School as a mobility hub.⁶ There is no

³ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page(s) 32, 75.

⁴ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page 69.

⁵ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page 104.

⁶ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page(s) 54, 92, 118.

discussion on whether or not these entities have been approached and if these proposals are even possible. The League agrees that, to achieve meaningful transportation solutions, there must be private-public partnerships. However, there must be more information on outreach to these entities and a plan for partnership implementation.

III. The Transit Plan cost analysis is overly complicated and undermines successful implementation of the plan. There must be prioritization of projects identifying funding needs, specifically the identification of small projects that can be implemented immediately.

As already mentioned, TTD's failure to incorporate explicit RTP policies regarding "free to the user" access undermines the entire funding analysis for the Transit Plan. The data for the Transit Plan relies on ridership data from before 2015.⁷ It does not include information from recently approved Placer County projects (Squaw, Martis West, and the Northstar Master Plan). It is unknown if these projects would impact ridership, which could in turn skew the Transit Plan's cost analysis. The League recommends that the plan use the most current available data in order to ensure a true baseline for understanding funding needs.

According to the Transit Plan, "the only change should be in the amount of service provided, not number of routes," but then later goes on to specify that routes will in fact be increased in the short term (from Meyers to Lake Tahoe Community College and throughout the AI Tahoe neighborhood).⁸ This contradiction again skews the funding needs. The Transit Plan also excludes any discussion of any upfront costs (i.e. additional buses or staff to implement the plan). All of these things should be considered in the funding needs.

The League again requests a prioritized project list for the Transit Plan for implementation if and when the associated funding needs are met. This is critical to the success of the implementation of the plan and to identify sustainable funding opportunities. Additionally, the Transit Plan should consider long-term regional funding solutions, including, without limitation, a basin entry fee, tolling, and regionwide parking fee structures.

IV. The Transit Plan fails to establish a regional transit connection between the north shore and the south shore. There is no actual regional long-range transit vision.

At no point during the planning horizon (the next twenty years) for the Transit Plan is it clear a commuter would be able to travel between the south shore and Tahoe City or completely around Lake Tahoe by using a single bus service. Currently, it is only possible for a commuter in the summer to go from the south shore on a bus to a trolley connection on the west shore to make it to Tahoe City, but that is not necessarily reliable. As this is a long-range planning document, there should, at the very least, be a concept proposing a pilot project contemplating how the TTD, local jurisdictions, and other agencies would work in concert to establish actual regional transit connections. There could be a single

⁷ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page 51.

⁸ Draft Lake Tahoe Basin Transit Master Plan. April 2017. Prepared by Stantec for Tahoe Transportation District. page(s)4, 71.

route that goes completely around Lake Tahoe without the need to connect to a local transit at each stop.

V. Recommendations from the League.

The Transit Plan requires further information related to implementation. There should be formalized coordination with TTD and TRPA. The TTD must prioritize project and funding needs for the League to successfully advocate for sustainable funding and in preparation for a bi-state consultation process. We recommend:

- **TTD and TRPA should enter into a formalized MOU.**
- **Future plans (i.e. TTD Corridor Plan(s), Short Term Transit Plan, and Area Plans) must go through a meaningful public process and incorporate public input.**
- **The Transit Plan should consider RTP strategy (i.e. free transit and parking management strategy) and what that means for funding needs.**
- **Clarification on how proposals like rail service and water taxis can be implemented.**
- **More information is needed on coordination between private-public partnerships.**
- **Current data should be used for ridership to understand funding needs.**
- **Contradicting statements and policies should be resolved.**
- **The Transit Plan should include a prioritized project list, and associated funding needs should be organized by year.**
- **The Transit Plan should propose a pilot project or consider a regional transit route and/or small scale system that can be implemented immediately.**

Sincerely,
Shannon Eckmeyer, Esq.
Policy Analyst
League to Save Lake Tahoe