

September 23, 2022

Town of Truckee, Planning Division
Jenna Gatto, Planning Manager
10183 Truckee Airport Road
Truckee, CA 96161
Email: JGatto@townoftruckee.com

Re: Truckee 2040 General Plan Update

Dear Jenna Gatto:

The League to Save Lake Tahoe (League) appreciates the opportunity to provide input on the 2040 Truckee General Plan (General Plan). The League is dedicated to protecting and restoring the environmental health, sustainability, and scenic beauty of the Lake Tahoe Basin (Tahoe Basin). In connection with our mission, we support transportation solutions for the Tahoe-Truckee region and advocate for the implementation of projects and policies contained within land use and planning documents affecting Tahoe that reduce dependence on the private automobile.

The General Plan lies outside of the Lake Tahoe Basin and the jurisdiction of the Tahoe Regional Planning Agency (TRPA), but will still have negative environmental consequences to the Basin. The distinct and cumulative impacts of regions surrounding the Tahoe Basin, such as the Town of Truckee, undermine Tahoe's ability to implement its Plans and meet its environmental protection goals and requirements. Because of the importance of Lake Tahoe as an Outstanding National Resource Water, as well as the unique and comprehensive environmental standards governing the Tahoe Basin, there must be a genuine analysis that looks at real impacts associated with traffic and water quality to the Basin before the FEIR can be certified.

The recognized leading threat to Lake Tahoe's famous clarity is fine sediment pollution running off urban landscapes, especially roads. Vehicle traffic exacerbates fine sediment pollution by deteriorating roads and crushing winter traction material. Internal combustion vehicles also emit nitrogen oxides into the atmosphere, which spur algae growth when deposited into Lake Tahoe. The local and regional transportation system in and between Truckee and Tahoe, and lack of alternatives to the private automobile, is one of the main contributions to Lake Tahoe's clarity decline.

The real and foreseeable impacts of the Truckee 2040 General Plan on the Lake Tahoe Basin must be addressed in this plan. There is little mention of Tahoe in the General Plan and the mitigation measures proposed focus only on Truckee town limits, meaning that the impacts to Tahoe go unmitigated. The Town of Truckee must coordinate closely with regional and local transportation, land use, and funding efforts and plans in the Tahoe Basin in order to effectively mitigate impacts to Tahoe utilizing the best available science. The League comments address the following:

- The General Plan doesn't address impacts on Tahoe's water quality and transportation, including but not limited to Tahoe's established Vehicle Miles Traveled (VMT) threshold.
- The additional traffic generated by Truckee in the General Plan update, with its proximity and advertising association with Tahoe, will have a direct impact on VMT and related water quality thresholds.
- The General Plan undermines TRPA's authority over and efforts to meet its threshold requirements.
- To effectively measure success of the intent of the Mobility Element and the VMT reduction strategies, comply with MMRP requirements, and inform adaptive management, additional mobility metrics must be adopted

Unmitigated Impacts to Tahoe

The known, unmitigated impacts of Truckee's General Plan on Tahoe's environment – water quality and transportation in particular – are problematic on two fronts: planning and implementation.

Planning

Both Placer County and the Tahoe Regional Planning Agency (TRPA) have adopted plans that do not consider the impact from the additional amount, type, and timing of traffic that would result from the General Plan. Placer County's 2016 Area Plan and 2020 Resort Triangle Master Plan, and TRPA's 2012 Regional Plan and 2020 Regional Transportation Plan, were designed and evaluated based on the existing internal and surrounding development trends and population and visitor estimates. The additional growth and related traffic and need for affordable housing will undermine Placer County's and TRPA's efforts to address those same issues in Tahoe. The referenced plans, and other Area Plans and corridor management plans in Tahoe, were not developed with the intent or even ability to address additional growth and trip generation as proposed in Truckee's General Plan.

Implementation

Truckee is undermining TRPA's authority over and efforts to meet its threshold requirements. The Tahoe Regional Planning Compact (Bi-State Compact) (P.L. 96-551, 94 Stat. 3233(1980), amended P.L. 106-3506, 114 Stat. 2351 (2016)) provides the framework for the development and implementation of the Environmental Threshold Carrying Capacities (threshold standards) and the Regional Plan. The Bi-State Compact defines threshold standards as "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." The threshold standards establish the shared goals for restoration and environmental quality in the Region. Once a threshold standard is set, TRPA is required to maintain adopted plans – such as the Regional Plan and Regional Transportation Plan (RTP) – to achieve and maintain the standard. TRPA has been given federal authority to implement growth controls through the RPU.

Between May 2019 and April 2021, TRPA updated its vehicle miles traveled (VMT) threshold with the League as a key stakeholder. The new threshold requires a 6.8% reduction in per capita VMT by 2045, aligned with the 25-year planning horizon of the 2020 RTP. The per capita metric is particularly germane to Truckee's General Plan. For the purposes of the threshold, VMT is measured within the Basin and per capita is the number of residents and visitors to the Basin. Neither the modeled VMT or per capita numbers considered any impact from an increase in population and traffic from Truckee to the Tahoe Basin.

The additional traffic generated by Truckee resulting from its proposed General Plan update, with its proximity and advertising association with Tahoe, will have a direct impact on VMT and related water quality thresholds. This is substantiated by the Future Traffic Analysis Report (Appendix E). In Table 4, the highest ADTs are heading toward Tahoe. Looking at Table 7, besides Truckee itself, Placer County and “Truckee - External to the Model Area” will experience the largest increases in VMT. The category “Truckee - External to the Model Area” is assigned an average trip length of 23.3 miles, which encompasses much of Tahoe and may reach to Reno. Without knowing how much of the 280,000 increase in VMT is assigned to Tahoe and Reno, there is no way to determine and mitigate the impacts to those locations. Similarly, the service population is also expected to dramatically increase, and workers will live in Tahoe and Reno due to lower housing costs. There are policy and financial consequences if Tahoe cannot meet the threshold and Truckee will not have to suffer those consequences.

Measuring mobility/success

One of the key policy questions posed in the Mobility Element is “Should the Town continue to evaluate level of service impacts in the General Plan? The level of service (LOS) measures the impact on drivers (like delay at an intersection) rather than the impact drivers have on the community (like measuring driver vehicle miles traveled).” The simple answer to this is “no,” and the two new actions (M-1.G and M-1.B) and new policy (M-1.3) that create VMT standards, mitigation, and monitoring and adaptive management are good replacements for LOS. The state of California has moved from LOS to VMT as a better, and required, measure of vehicles’ impact to a community.

Beyond just replacing LOS with VMT, this Mobility metrics question must be broadened. The Mobility Element identifies, in narrative form, what success looks like. In order to accurately and meaningfully measure the impact from and changes to the entire transportation system – beyond just cars, as the Mobility element proposes to do – additional mobility metrics are needed. Additional mobility metrics will help measure effectiveness of the single, vague transportation mitigation measure in the DEIR; and will help address inadequacies in the proposed integration of the Mitigation Monitoring and Reporting Program (MMRP) into the General Plan. The single significant impact identified in the DEIR is Impact 4.17-2, which relies on implementing the General Plan itself as mitigation. The measure of mitigation for this significant and unavoidable impact is solely reduction in VMT, however there are insufficiencies in modeling and quantification as detailed below.

To effectively measure success of the intent of the Mobility Element and the VMT reduction strategies, comply with MMRP requirements, and inform adaptive management, additional mobility metrics must be adopted. We recommend the following:

- Mode Share. Include Transportation Network Companies (TNCs, like Uber and Lyft) and personal shared micromobility (bike/scooter share).
- Multi-Modal Level of Service (MMLoS)
- Travel time reliability. This could potentially include a Travel Rate Index, which shows how much time is added to a trip during rush hour conditions compared with free-flow conditions.
- Multi-Modal Accessibility.
- Additional transit-specific metrics, such as total boardings and revenue hours.
- Distance of bike path and sidewalk construction per year.

- Safety. This is a big barrier to mobility options, both functionally and in terms of public perception. Existing metrics that could be used as is or improved include AllTransit scores¹ (a measure of nearby mass transit quality by street address), WalkScores² (a measure of the diversity of destinations within walking distance), and BikeScores³ (a measure of the quality of nearby bike networks).
- Cost of Travel per Person-Trip. This is also good for measuring access and equity.
- Person-trips, person-miles, person-minutes-of-exposure, ton-miles. To better measure personal mobility and accessibility – modes that are not a car. This could also be a good metric to measure freight.

Funding and prioritization

The funding section of the Mobility Element proposes to “Focus on generating adequate funding through implementation of the Town’s adopted Traffic Impact Fee Program, various measures for transportation improvements and potentially adoption of a Vehicle Miles Traveled Mitigation Fee.” We support the Traffic Impact Fee (Policy M-6.1 and Action M-6.A), and VMT Mitigation Fee and Actions (Policy M-6.3 and Action M-6.A).

The element also includes Goal M-8, Action M-3.C and Policy M-6.2 to identify funding mechanisms for transit. Tahoe is going through this same process right now as a region. It might not make sense to combine actual fundraising efforts with Truckee but there are years of studies and lessons learned that Truckee could benefit from by joining in on those conversations, being led by TRPA and TTD.

Successful fundraising will require a prioritized list of the most cost-effective projects and programs, with effectiveness based on VMT reduction along with the additional mobility metrics proposed in our comments, above. That prioritized list should be part of the funding section of the Mobility Element before the General Plan and FEIR are adopted.

The potential Highway 267 bypass widening is contemplated as both a key policy question in the Mobility Element and in the Future Traffic Analysis Report. Quite simply, this is a bad idea and should not be included in any land use or transportation plans. Induced demand has long been accepted as a fact by transportation planners across the globe. All land use and transportation plans must focus on “mobility” in line with the intent of the 2040 Mobility Element. If any kind of road widening or capacity increases are contemplated they must only be to improve non-car mobility such as adding transit priority lanes or bicycle and pedestrian infrastructure.

Enhancing Goals, Policies, and Actions

As the DEIR states (Impact 4.17-2), “No additional feasible mitigation measures are available to reduce impacts beyond compliance with the policies and actions in the proposed GPU and Downtown Truckee Plan.”

We are not recommending adding additional Goals, Policies, or Actions at this point but encourage the Town to consider new and emerging transportation options and technologies though adaptive management informed by the additional mobility metrics we recommend. There are two strategies included in the Mobility Element that we recommend refining and enhancing:

¹ <https://alltransit.cnt.org/>

² <https://www.walkscore.com/>

³ <https://www.walkscore.com/bike-score-methodology.shtml>

- Policy M-5.4 (modified from Policy 6.8 in the 2025 General Plan): Parking standards. “To limit impact to existing neighborhoods and businesses, ensure that adequate parking is provided for commercial, office, residential, and other land uses in Truckee, while at the same time limiting excess off-street parking. Use shared parking solutions and adopt reduced parking standards when new land uses can justify it to discourage automobile use.
 - What is the definition of “adequate parking?” How minimum parking requirements affect other goals in the Mobility Element (reducing dependency on the private automobile and increasing mobility) and other elements in the General Plan, especially those around Land Use, must be evaluated as part of the parking requirement evaluation.
 - Focus on Action M-5.B: Evaluation of Parking Requirements. New parking requirements with reduced minimums must be promulgated as part of General Plan implementation.
 - Focus on “Use shared parking solutions and adopt reduced parking standards when new land uses can justify it.” This strategy should not include the qualification that it must be justified, but instead read “Use shared parking solutions and adopt reduced parking standards.” All new land uses must accommodate reduced parking standards through actions listed in this element as well as by implementing TDM strategies in order to comply with the intent and requirements of the General Plan.
- TDM strategies (Policy M-1.2, Action M-1.A) should be more than just suggested or provided, they need to be required. In Tahoe there has been a TDM requirement on the books since the 1990s and TRPA has never enforced it. Placer County has begun requiring and will start enforcing their version, which provides a good example to follow. TDM strategies could be an effective mitigation measure to address impacts beyond the Town of Truckee by providing transportation alternatives to workers who cannot live in Truckee. The TDM strategy language must include requirements with monitoring, education, and enforcement in order for it to be effective.

Conclusion

Thank you again for the opportunity to provide our comments and recommendations. We hope you will take an earnest look at them and incorporate them into the 2040 General Plan and accompanying EIR before adoption and certification. These comments seek to address impacts on the Tahoe Basin from the General Plan.

The League is more than happy to make introductions and connections that will allow the Town of Truckee to work with Tahoe Basin partner governments and agencies. Sharing knowledge and coordinating transportation options between the inextricably linked communities will help all of us achieve our mobility goals.

Sincerely,



Gavin Feiger
on behalf of the League to Save Lake Tahoe
Senior Land Use Policy Analyst