



Placer County Community Development Resource Agency
Attn: Crystal Jacobsen, Project Manager
3091 County Center Drive, Suite 190
Auburn, CA 95603
cjacobse@placer.ca.gov

January 31, 2014

Subject: Placer County Tahoe Basin Community Plan Policy Framework

Dear Ms. Jacobsen:

The Friends of the West Shore (FOWS) appreciates the opportunity to provide comments on the Placer County Tahoe Basin Community Plan Update Policy Framework (Framework). However, the purpose of this framework within the context of the Community Plan/Area Plan update is unclear, as are the mixture of terms between the Placer County and TRPA planning requirements.

In addition, depending on the purpose of this framework document, there is a lack of reference and detail related to TRPA policies (and therefore, policies based on meeting Tahoe Basin's environmental thresholds). Also, policies based on environmental outcomes should be tied directly to TRPA's thresholds, not merely to the Regional Plan.

More detailed comments regarding the relationship to TRPA requirements have been noted in comments submitted by Ellie Waller, a member of the North Tahoe West Planning Team. We herein incorporate Ms. Waller's 1/31/2014 comments on the framework, and add the following additional comments (attached).

Please feel free to contact Jennifer Quashnick at jqtahoe@sbcglobal.net if you have any questions.

Sincerely,

Susan Gearhart,
President,
Friends of the West Shore

Jennifer Quashnick
Conservation Consultant
Friends of the West Shore

Attachments: (Six documents pertaining to identified faults along the West Shore).

Framework, Community Plan Update, and Area Plans

Purpose of the Framework:¹

The following is noted on Placer County's website:

At this time, the County is soliciting feedback on the overarching goals and guiding policies contained in this Policy Framework and the policies that will be incorporated into the Public Review Draft Policy Document. Comments received before February 1, 2014 will be considered in preparation of the Public Review Draft of the Policy Document. There will be additional opportunity to comment on policies after the publication of the Public Review Draft of the Tahoe Basin Community Plan Policy Document in Spring 2014. Comments can be emailed to [Nicole Hagmaier](#) or [Crystal Jacobsen](#).

It remains unclear what the purpose of this framework document is. How does this relate to alternatives that will be analyzed in an EIR/S for the Community/Area Plan ("Plan") update? Will the framework serve as the policies which will be analyzed, similar to how TRPA's draft Code for the preferred RPU alternative was claimed to support the RPU EIS analysis of policy and Code changes? If the framework is intended to provide the policies for which alternative Plans will be analyzed in the EIR/S, then the framework requires far more information, detail, and additional public comment and review opportunities. Further, how much will this framework 'set in stone' the direction for future Placer County Plans in the Basin? There is a great deal of more recent scientific information that is available, yet not included within the items in this framework.

Although it is unclear what the intent of this framework is (at least to those not serving in any Planning Teams), FOWS provides the following comments on the draft framework. However, if this is more than a simple 'over-arching' document, we request the opportunity to clarify the intent and provide further comments.

Confusion among Community Plans, Area Plans, General Plans, and Plan Areas:

The framework document includes:

For TRPA's purposes, the overarching Tahoe Basin Community Plan Policy Document, combined with the separate zoning/development standards and design guidelines for individual sub-areas, will serve as four separate area plans for the Placer County portion of the Tahoe Basin. (p. 3)

Until release of this Framework document, Placer County has suggested it would develop one Area Plan for all portions within the Basin; it appeared to be noted so on TRPA's December 2013 Area Plan Map (<http://www.trpa.org/wp-content/uploads/December-18-2013-Governing-Board-Packet.pdf>), although instead of planning teams, the map now says 'plan area.' Placer County needs to clarify exactly what will be an Area Plan, what those boundaries will be, etc., and to also be cognizant of confusing terms. Differences and clarifications are especially important among the following terms:

- Area Plans
- "Plan Areas"

¹ Note: Throughout these comments, we simply paste the framework language, followed by our comments on the language.

- Community Plans
- Plan Area Statements (TRPA)
- General Plans (CA requirement)
- Community Plan Policy Framework
- Sub-areas

Finally, it is unclear how the framework addresses the unique characteristics among different communities in the Placer County portion of the Basin. Although four Area Plans appear to be planned for TRPA's RPU requirements, it is unclear how the framework distinguishes between these four areas.

Conservation:

Vegetation:

Vegetation policies seek to guide the protection and management of the Plan Area's vegetation resources.

- Provide for a wide mix and increased diversity of native plant communities, free of invasive plant species
- Provide for the protection, maintenance and restoration of such unique eco-systems as wetlands, meadows, and riparian and other native vegetation

Although the policies are noble, the Community/Area Plan must do more than merely "guide" or "provide for." The Plan must include clear, enforceable requirements that will protect and manage the areas's vegetation resources, and *require* those items currently noted after "provide for" (not all examples are included above).

Wildlife:

Maintain suitable habitats for all indigenous species of wildlife without preference to game or non-game species through maintenance and improvement of habitat diversity. Preserve, enhance, and where feasible, expand habitats essential for threatened, endangered, rare, or sensitive species. (p. 4)

We recommend adding "Maintain *and increase* the extent of suitable...through maintenance, improvement, and *protection* of habitat diversity," and removing "where feasible." Preserving and enhancing should be a goal of the Plan.

Fisheries:

Improve aquatic habitat essential for the growth, reproduction, and perpetuation of existing and threatened native fish resources. (p. 4)

How will improvement be determined? We recommend changing the wording to reflect that the plan will "require improvements that will ensure that aquatic habitat ..." Further, fisheries policies must recognize the importance of shoreline activities and structures on fish habitat and include policies to protect that habitat. In addition, with climate change, habitat needs will vary. This must be addressed as well.

Soils:

Human activity increases erosion potential, primarily through the development of structures and impervious surfaces, and the removal of vegetative cover. Soil policies seek to maintain soil productivity and vegetative cover, and prevent excessive sediment and nutrient runoff into streams and Lake Tahoe. (p. 4)

- Minimize soil erosion and the loss of soil productivity in order to sustain forest vegetation, water filtration and storage, and wildlife habitats within the Plan Area
- Encourage restoration of native wetland habitat to provide natural filtration of stormwater/developed area runoff
- Encourage appropriate landscaping in developed areas that will minimize negative impacts to natural runoff and filtration processes (p. 5)

Soil function is key to attaining numerous TRPA thresholds. Soil policies must protect soil function. The benefits of healthy soil, including less erosion and more infiltration of water, will benefit Lake Tahoe. However, the TRPA RPU policies which may be incorporated into the Area Plan will add more coverage closer to Lake Tahoe. We recommend Placer County choose a plan which will truly protect soil function and allow it to serve the natural benefits it provides where it is most needed – including closer to the Lake. Placer County, therefore, must give significant thought to which TRPA policies to maintain and which to modify to protect soil values in the County (e.g. Placer County need not adopt TRPA’s increased coverage allowances closer to the Lake).

We recommend replacing “encourage” (restoration of native wetland habitat...) with “require.”

Shorezone:

The scenic quality of the Lake Tahoe shoreline is enhanced by views that range from sandy beaches to isolated coves, rocky shorelines, and steep cliffs. The competing demands for development of the shorezone need to be reconciled in light of the unique qualities that stand to be lost.

- Provide for the appropriate shorezone uses of Lake Tahoe, while preserving the shorezone’s natural and aesthetic qualities (p. 5)

Shorezone protections must also address conditions in the nearshore, for which far more information is now available,² as well as protecting the views of the shoreline from both the Lake and land. Public access to the shorezone must also be addressed (increased). As FOWS has noted previously, publicly-owned beaches existing in Homewood that are difficult to access (and unknown to many). We will provide additional details as the area plan process proceeds.

Shorezone policies must also incorporate and address the impacts of structures and activities in the shoreline (e.g. piers, boats), and how policies affect these items.

Scenic Resources:

The scenic quality of the Tahoe Basin is appreciated by visitors and residents alike and is viewed from roads, trails, scenic resources such as parks and public beaches, and the surface of Lake

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[http://www.dri.edu/images/stories/centers/cwes/Lake Tahoe Nearshore Evaluation and Monitoring Framework.pdf](http://www.dri.edu/images/stories/centers/cwes/Lake_Tahoe_Nearshore_Evaluation_and_Monitoring_Framework.pdf)

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Tahoe. Scenic policies are intended to preserve views of natural landscapes and features offered from the Plan Area's scenic corridors, recreation areas, and bike and pedestrian trails.

- Maintain and restore the scenic qualities of the Plan Area with natural landscape
- Improve the accessibility of Lake Tahoe for public viewing
- Encourage redevelopment of man-made features along the roadway and shoreline within scenic corridors that are in non-attainment (p. 5)

The first bullet seems incomplete or confusing; or, it fails to acknowledge the protection of scenic views. Please make this clear. Further, not all scenic impacts can be 'fixed' with natural landscape. Clearly, buildings which block scenic views will block those views. Adding trees in front of the buildings may mask the impact of the development, but it does not negate lost views. This section must be revised, and/or a bullet added which will specifically protect existing scenic views of the Lake and mountains, and increase those views. The second point appears to focus on improving public access to the Lake, not improving public views of the Lake (from the land). This needs to be clarified as well. Finally, manmade development can impact scenery, but it is not the scenic resource TRPA's Compact prioritized; therefore protection of scenic views, vistas, the mountain, the Lake, etc., must be prioritized. Redevelopment of buildings is a secondary step but it must not come to the detriment of the protection of *natural* scenic resources.

Stream Environment Zones (SEZs):

While SEZs only make up 5 percent of the land area in the Tahoe Region, they provide key habitat for 84 percent of the 250 wildlife species in the Region and can help to reduce sediment and nutrient runoff concentrations by 70 to 90 percent. SEZ policies seek to promote maintenance, protection and restoration of SEZ land in the Plan Area.

- Provide for the long-term preservation and restoration of stream environment zones by encouraging and supporting public acquisition of SEZ land by land banks and public entities
- Encourage restoration of SEZ lands that have been disturbed, developed or subdivided
- Manage areas of open space to promote conservation of vegetation and protection of watersheds
- Incentivize the restoration of previously altered vegetative communities or low capability lands to their natural appropriate ecological state (p. 5).

SEZ policies need to require the maintenance, protection, and restoration of SEZ lands, not merely "promote." TRPA's RPU SEZ policies merely encourage SEZ restoration, but do not require it, nor tie future development approvals to a quantifiable amount of SEZ restoration. Therefore, the Placer County plan needs to fill this gap by upping the regulations to ensure SEZ values are protected and enhanced. In addition, the first bullet refers to public acquisition of lands by land banks and public entities. However, acquisition by land banks does not necessarily equate to SEZ protection and restoration. This can only be assured with ongoing measurements to ensure restored areas are functioning naturally. In addition, as the land bank agencies (e.g. California Tahoe Conservancy) are moving into the business of purchasing developed lands, and then selling those additional commodities (we refer to CTC's Asset Lands program, and recent CTC interests to purchase developed properties), this adds even more uncertainty to how land bank programs will operate in the future. We recommend revising this statement so the plan focuses merely on protecting SEZs, rather than suggesting how it might be done.

We recommend adding "maintain and manage areas of open space..." as there should be no net loss of open space.

The Plan must also recognize the increased flooding that will occur in the Tahoe Basin due to climate change. It has been well-established by researchers that the Basin will see less snow and more rain, and that increased flooding will occur. Existing standards based on the 20-year 1 inch/hour storm standard will not suffice. The Plan must consider and address the increased flooding, including increasing natural areas that will be able to help handle the increased water volume, and increased infiltration to remove the pollutants. Extensive information regarding the conditions and expected climate change impacts can be found on the Tahoe Environmental Research Center (TERC) website (<http://terc.ucdavis.edu/publications/publications.html>) including a StateoftheClimate 2013 report, numerous research papers and studies, and other information. TRPA's RPU did not include this information; Placer County must do so.

Finally, we recommend that incentives and requirements be used to obtain restoration of altered communities (last bullet); requirements may be limits on new development tied to achievement of restoration (in other words, they need not be requirements on a project proponent, but rather requirements for the agencies implementing the plan). In summary, the plan must not merely encourage or strive for SEZ protection, but must have the "teeth" to make it happen.

Cultural Resources:

Cultural resources include sites, buildings, structures, or objects that may have archaeological, historical, cultural, or scientific significance. Cultural resource policies prioritize the preservation and protection of historic resources in the Plan Area.

- Identify, preserve, and encourage interpretation of sites of historical, cultural and architectural significance (p. 6)

We have heard from Washoe Tribe representatives and others at Placer County public meetings that there is extensive history on the West Shore, and many places sacred to the Washoe. During the 2012 RPU process, representatives from the Tribe provided the TRPA Governing Board with a packet, which they stated listed out historical and significant places around the Basin. We request Placer County obtain this document and ensure that Washoe's cultural resources are fully-protected and that the Plan works to help remove any impediments to Washoe's access to their existing cultural resources.

Energy:

Energy policies seek to promote energy conservation and reduce impacts to natural resources and the environment.

- Promote energy conservation programs and development of alternative energy sources to lessen dependence on scarce and high-cost energy sources (p. 6)

The energy policies should include specific language to promote clean forms of energy to protect the environment. It is unclear why the only policy would focus on scarcity and high-cost energy sources. This is also curious given the proposed CalPeco Electrical Upgrade, which would double energy capacity throughout the area (and is therefore in direct contradiction with policies to conserve energy), let alone create significant environmental impacts within the area plan boundary.

Water Quality:

Several external and internal factors are known to affect water quality of the Basin's aquatic system including: precipitation, air quality, atmospheric deposition, land use intensity, impervious cover, urban stormwater runoff, and soil disturbance. Water quality policies seek to reduce or eliminate point and non-point sources of pollutants in a manner consistent with the County of Placer Lake Tahoe Pollutant Reduction Plan.

- Coordinate with federal, state, regional, and private stakeholders when implementing local water quality management program projects to aid in the effort to restore and maintain Lake Tahoe's unique transparency, color and clarity
- Reduce or eliminate point and non-point sources of pollutants that affect, or potentially affect, water quality (p. 6)

These policies must be backed up by solid monitoring requirements, which rely on field measurements of water quality to ensure pollutant reductions are actually occurring. Monitoring requirements associated with the TMDL, which rely primarily on modeling and reporting observations (not measurements), will not ensure water pollution will be reduced as needed to meet water quality standards.

Further, as noted elsewhere, the Plan must address Tahoe's nearshore issues. Ample information is available to understand some of the most basic causes of nearshore degradation (e.g. nutrients from runoff which feed the growth of attached algae) and measures available to reduce those impacts (reduce fertilizer use containing both nitrogen and phosphorous, more infiltration, less coverage closer to the Lake, etc.). Please view DRI's 2013 Nearshore Report (link previously provided) and incorporate protective measures into the Plan. In addition, see comments regarding flooding and climate change.

Air Quality:

Cars and trucks are responsible for most of the smog-producing pollutants (nitrogen oxides and reactive organic gases) in the Tahoe Basin and two-thirds of the carbon monoxide. Air quality policies seek to maintain TRPA's air quality thresholds and all applicable federal, state and local standards for air quality.

- Attain and maintain local ambient air quality levels that help meet regional attainment status and contain low levels of air pollutants (p. 6)

The first statement needs to be corrected. *Motor vehicles* are the biggest contributors, including both on-road (cars and trucks) and off-road (e.g. boats, OHVs) vehicles. In fact, CARB's most recent Emissions Inventory for the LTAB reveals off-road vehicles contribute *more* NOx and ROG's than on-road vehicles (see 2008 CARB EI for Lake Tahoe Air Basin). Therefore, policies must address the air pollution associated with boats, OHVs, OSVs, and other off-road motor vehicles. The Plan's policies must address all sources, and include measures to ensure air quality standards will be met and sufficiently monitored.

In addition, as atmospheric deposition plays an important role in water clarity, the air quality section of the plan must also include requirements to reduce the deposition of pollutants as needed to meet water quality standards (see the final Tahoe TMDL reports).

Noise:

Transportation corridors are the main source of noise in the Plan Area. Other noise sources include motorized watercraft, construction vehicles and equipment, machinery associated with refuse

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collection and snow removal, and off-road vehicles. Noise goals seek to achieve and maintain Placer County and TRPA noise thresholds in the Plan Area.

Work with TRPA, Caltrans, TART and the Placer County Public Works Roads Division to mitigate transportation-related noise impacts on residential and sensitive uses. Additionally, continue to limit hours for construction and demolition work to reduce construction-related noises. (p. 6)

Although the introduction here identifies sources other than just on-road vehicles, the proposed policy concept focuses only transportation-related noise. The plan must also consider noise from other sources, including recreational vehicles (e.g. snowmobiles, boats, OHVs, etc.), and include measures to monitor and enforce all noise provisions. Further, although construction noise may be exempt during certain daytime hours, as we have noted in comments related other plans and project documents (e.g. Homewood Mountain Resort), the impacts of one project that will undergo construction for 9-10 years will not be temporary to those exposed to the noise for years to a decade or longer. Cumulative impacts of multiple construction projects are also likely under the new RPU and multiple other proposed projects and plans for the West and North shore areas, and combined, these noise impacts may also be significant and occur for years to decades in duration. These impacts must be addressed, and not be written off by mere references to ‘exemptions.’”

Natural Hazards:

Natural hazards in the Lake Tahoe Region are most frequently related to dangers of avalanches, wildfires, flooding, earthquakes and seiches. Natural hazards policies focus on identifying and taking precautionary measures to minimize risks to natural hazards.

Minimize risks from natural hazards such as flooding and wildfire hazards (p. 7).

This section should also include the identification and disclosure of the most recent science regarding natural hazards (e.g. flooding, identified faults [regardless of whether they have been officially included in California’s program], sieches, tsunamis, etc.). Further, the Plan should require updated emergency plans which address how to respond in these events, and revise land use policies to prevent new development in areas needed to deal with events, and/or which will further impede emergency evacuation routes and opportunities.

Attachments related to identified fault lines are included with these comments.

Land Use:

Preserve and protect residential neighborhoods while allowing limited opportunities for small-scale retail and service uses such as small stores selling fresh produce and basic daily goods, cafes, and coffee shops

These policies must be more refined as the current mixed-use designation provided by TRPA’s RPU does not limit new non-residential uses to these smaller types of neighborhood uses. Such policies for West Shore communities are especially important, and must be clear and precise in policy language.

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Facilitate orderly development of larger plan area sites (e.g., Tahoe City Golf Course) by requiring master plans or a similar planning program. Ensure all such plans provide for a mix of uses in a pedestrian- and transit-oriented setting, including recreational amenities, and provide site sensitive planning and environmental design to support and protect sensitive habitat

What are “other similar planning programs?” Also, as the golf course was not initially included in TRPA’s Town Center district in the RPU, there is great concern with a policy to facilitate its development. We recommend this entire bullet be deleted.

- Provide for the protection and preservation of open space, as well as conservation, wilderness and backcountry land located within the Plan Area

We recommend removing “provide for” and simply “Protect and preserve...” In addition, policies must clearly delineate open natural space from “open” pedestrian plazas or facilities.

- Provide areas for passive and active recreation uses and related services to improve public access and enjoyment of Lake Tahoe and the Truckee River. Allow limited supportive retail and service uses when coupled with environmental enhancement improvements

What are examples of “limited supportive retail and service uses”? How will environmental enhancement improvements be quantified?

- Require development on properties with lake frontage to be designed and built to maximize visual and public access to and along the shore as well as require public amenities on site

Policies should clearly distinguish between view sheds and view corridors. View sheds must be protected and policies should strive to open up more view sheds in the future. View corridors, which may provide a glimpse of scenery, have been used to allow developments which otherwise block much larger views.

Mixed Use:

Recognize the importance of mixed-use areas to the vitality and quality of life in the Plan Area

Quality of life in many west shore communities is enhanced by the fact that non-residential uses have generally not been expanded in residential neighborhoods. Many communities want to maintain their existing quality of life in these areas, and the RPU’s imposition of Mixed Use zoning threatens this. Placer’s policies must clearly reflect that the desires of existing community members and local environments will be prioritized and “downzoning” or other adjustments will be done as needed to support what west shore communities desire for their quality of life.

- Foster high quality design, diversity, and a mix of amenities in new residential, commercial and tourist accommodation
- Establish building form standards for mixed-use tourist districts that build on the existing tourist recreation theme with high-quality storefronts designed to attract tourists and meet the needs of local residents

Policies must aim to clearly retain the character, size, and scale of buildings in existing neighborhoods, and storefront designs should be within the size, scale, and type of uses desired by existing residents. We note many tourists along the West Shore do not want Heavenly Village or Northstar-type storefronts, for which “high-quality storefronts” appears to suggest or imply.

Community Design:

Establish community design criteria to ensure the height, build, texture, form, materials, colors, lighting, signage, landscaping, and other design elements of new, remodeled and redeveloped buildings are compatible with the natural, scenic and recreational values of the Plan Area

- Establish building height standards that support a high-quality, pedestrian-scaled environment, in neighborhood centers and town areas compatible with scenic values of the Plan Area

Policies must clearly require new/remodeled buildings to be compatible with the natural, scenic, and recreational values of the community they are in. Community character and scale are paramount. For example, the Homewood Mountain Resort project is of a much larger scale than anything existing in Homewood’s community now, so much so that TRPA had to amend its own plan to permit it. Placer County’s Plans must ensure community scale is a priority well before any projects are proposed.

What are “high- versus low- pedestrian scaled environments?”

Development and Redevelopment:

Encourage the development and redevelopment of tourist accommodations in the Plan Area by removing barriers to hotel development (or redevelopment) and promoting opportunities for public-private partnerships.

Policies of this nature are of great concern. For example, what are the ‘barriers’ to be removed? Is this throughout the entire Plan, or will this be narrowed down to specific locations in Town Centers? Further, based on experiences with projects like Homewood Mountain Resort, which include some level of private-public partnerships, and TRPA’s Code language regarding “Linked EIP projects,” FOWS is concerned with how wide open this policy is. Not all areas need more or larger hotels, and not all areas should blindly promote public-private partnerships (or not all partnerships should be promoted).

Encourage consolidation of development and restoration of sensitive lands through transfer of development rights and transfer of land coverage programs. Consider a revised allocation program which allows for inter-jurisdictional transfers and conversion of tourist accommodation units to commercial floor area

We recommend policies for restoration of sensitive lands clearly specify lands are restored and maintained in a naturally-functioning condition. Further, as land banks may sell potential coverage, etc., merely relying on transfers does not guarantee restoration.

Therefore, policies must clearly require lands are restored; we suggest removing “through transfer of development rights and transfer of land coverage programs.”

We recommend the second statement be removed. It is unclear what this would entail, however, the RPU recognized the Basin had excess unused CFA and required it be used prior to adding more.

Recreation and Public Services and Facilities:

Recreation:

Provide for the appropriate type, location, and rate of development of outdoor recreational uses

- Use open space to meet multiple needs including bike and pedestrian linkages, stormwater drainage, wildlife habitat, and active and passive recreation opportunities

What are the criteria that will be used to assess what is appropriate? Regarding open space, see previous comments.

Protect and support existing public beach access as well as secure additional public access rights as opportunities arise

As noted by FOWS, there is already an opportunity for this in Homewood. In addition, we recommend removing “as opportunities arise.” Why limit this at the policy stage? It should be encouraged; the policy need not state whether through new efforts or opportunities that may arise.

Public Services and Facilities:

Public services and facilities should be upgraded and expanded to support existing and new development consistent with the Regional Plan

Facilities should be consistent with the environmental thresholds; we recommend replacing “the Regional Plan” with “environmental thresholds.” Further, we are concerned with the circular dilemma where the RPU/proposed Plan increase the the numbers of residents and visitors, which then generates additional demand for public services and facilities, which may be upgraded to increase capacity (for example, the CalPeco Project), and with increased capacity, we see more residents and visitors – and the ‘circle’ continues. The Basin can only handle so much before our unique natural resources are harmed – a problem recognized by the TRPA Compact (and the reason for environmental threshold carrying capacity requirements. Therefore, policies should tie directly to these environmental capacities, not the Regional Plan.

To ensure protection of the public health, safety and general welfare of the Plan Area, educational and public safety services should be sized to be consistent with projected growth levels

As with environmental capacities, the plan must also not increase the demand for public health and safety services beyond the point we can accommodate. For example, Plans which add more vehicles to S.R. 89 along the West Shore create more problems in the event of emergencies; emergency vehicles cannot get through traffic, evacuate routes are limited, etc. This cannot be remedied through the sizing of facilities (for example, nothing can be placed along the West Shore that would substitute for an emergency evacuation of all residents and visitors if one were needed).

Transportation:

The noted policies may all help with the transportation network, however, a key need for planning is to ensure that new vehicle-generating developments, redevelopments, activities, etc., are tied to *measured* vehicle numbers and measured environmental conditions. Further, policies must acknowledge the reality that even if a “one stop” approach works for some communities, visitors will still drive into and out of the Basin to West Shore destinations. Therefore, policies must ensure that all ingress and egress traffic be considered (beyond providing ‘walkable’ communities once people arrive). Ingress/egress traffic will still generate air and water pollution, greenhouse gas emissions, and impede emergency vehicles, evacuations, etc.

Further, where plans or projects rely on bike trails, pedestrian paths, public transit, etc., policies must require that these services be provided as assumed by the projects or plans. For example, if a project relies on bike paths to mitigate some portion of new vehicle use, requirements which will maintain access and safety of the bike paths year round are needed. As it currently stands, plans and projects often rely on bike paths to mitigate increased traffic, yet do not require bike paths be maintained open and safe for use year-round. In addition, policies must be realistic regarding the percentage of non-auto use based on the best available information, by season.

Bicycle facilities should also not be constructed so as to inhibit natural soil function and vegetation growth.