

## **Public Comment: TRPA Housing Work Group October 28, 2021**

*Submitted by Carole Black Incline Village Resident*

I am concerned about potential unintended consequences of recent TRPA Code changes related to ADUs with the hope that this group will consider modifications during this next phase of program development:

### **I. Will the intended goal of adding ADUs result in more, more affordable housing units or Will new ADUs instead become STRs?**

- **Recent TRPA code modifications re ADUs may fail to meet objectives and instead result in unintended adverse consequences. In particular, if applied to Nevada areas without a specific restriction**, since there is no statutory reg as in CA (that new ADUs not be used as STRs) and local codes may be revised to parallel TRPA, **these units could** (? likely will) **be developed for the more profitable STR use.**

- Even in areas where Bonus Units could have been used, the purchase of development rights for unrestricted ADUs will not be a prohibitive obstacle especially when a parcel could offer multiple STRs!

### **II. Has growth in STR use diverted existing housing units?**

- **STRs are diverting housing which is often more affordable and/or has been or could be long-term rentals; in addition they may drive up rental and overall housing prices**

- 77% of currently issued STR permits in Washoe County (almost all in the Tahoe region) are for smaller condo/apartment-type units – i.e., the more affordable units overall

- Though not focused on this aspect, recent WC Tahoe Housing study has documented conversion of rental housing to STRs – their observation is noted to be the “minimal” finding with additional direct analysis needed for a more complete estimate

- Literature from other markets supports this observation

### **III. Will ADUs drive housing availability to the target workforce?**

- **Possibly, BUT Maybe NOT:**

- **Bonus Unit ADUs**, though restricted, if available in the current achievable category, may have high enough eligible income levels for pricing out of reach to most of targeted local workforce

- **Non-Bonus Unit ADUs** will proliferate in broad areas since there are many parcels with available coverage and likely potential pricing structure to accommodate purchase of development rights driving high rental rates whether or not they are used as STRs

- **No residency or rental restriction for main “house”** so owner could live in a Bonus Unit ADU and use the main house as an STR or >30 day transient rental with no net housing add

- **Seasonal rentals** to other than seasonal employees working locally might occur with a Bonus Unit ADU if the renter used the ADU as their “primary residence” during the rental period.

### **IV. Have other options been fully explored?**

- **There is, for example, concern re central area housing developments (IVCB) currently being proposed with no allocations for a subset to be reserved as “more affordable” units**

Thank you for considering these concerns and incorporating remedies in future recommendations.