

Date: January 30, 2023  
To: TRPA Permitting Stakeholders  
From: Arlo Stockham, AICP

**Subject: Implementation Recommendations for the *Permitting Improvement Action Plan***

I have been retained by the Tahoe Regional Planning Agency (TRPA) to help improve their permitting system. This technical report is part of that effort – providing implementation recommendations for Phases 1 & 2 of the *Permitting Improvement Action Plan* (“*Action Plan*”).

The *Action Plan* is a strategy and 18-month work program to implement permitting system improvements. It was developed through a participatory process and was endorsed by the TRPA Governing Board in August 2022. The *Action Plan* identifies process improvements and code amendments focused on the following priority topics:

- *Establish more efficient, consistent, and predictable application review processes.*
- *Simplify and shorten review processes for minor applications and sequential approvals.*
- *Update code standards that are difficult to interpret, do not add value, or are unduly cumbersome.*
- *Prioritize public communication and customer services.*
- *Expand tools for staff development and training.*
- *Maintain adequate and dependable funding to support quality application reviews.*

The *Action Plan* identifies a series of “Action Items” for each priority topic. Action Items are outcome-oriented statements of planned changes. This report expands upon the *Action Plan* with specific recommendations to implement the Phase 1 and Phase 2 Action Items.

The following recommendations were reviewed, discussed, and refined in coordination with the TRPA staff team for permitting improvements, and with other key staff members. Changes respond to suggestions raised by a variety of stakeholders.

This draft is for additional stakeholder review and feedback. Please contact me with questions or suggestions; and provide review comments by February 22, 2023.

We plan to update these recommendations and present them to the Governing Board in March. Programs will then be developed for final approval and implementation by August 2023. Phase 3 efforts will follow.

Overview Statement: The TRPA permitting system is fundamentally challenged by the complexity of administrative practices, combined with an application fee structure that is not recovering program costs. Staff have struggled to keep up with permit reviews, but funding limitations have prevented additional staffing increases. This is impactful for applicants and is not fiscally sustainable for TRPA.

Most recommendations focus on process improvements to operate in a more consistent, efficient, and predictable manner. Targeted fee adjustments are also recommended, primarily for certain shoreland and shorezone applications with fees well below the actual review costs. If fewer process improvements are implemented, additional funding will likely be needed.

Content and Organization of the Technical Report: This report includes a section for each Priority Topic. Each section begins with the Assessment Summary and Action Items from the *Action Plan* (in italic text), followed by recommendations for each topic. Topics include:

Priority #1: Establish more efficient, consistent, and predictable application review processes.

- Temporary Resources to Complete Projects
- Shared Forms and Templates for Permitting Documents
- Staff Teams for Application Reviews
- Comprehensive Administrative Procedure Manual for TRPA Permitting
- Additional Administrative Improvements
- Improve Application Content, Forms and Templates (phase 3)

Priority #2: Simplify and shorten review processes for minor applications and sequential approvals.

- Minor Applications (with shorter review timelines and simplified processes)
- Bundled and Concurrent Applications
- Exempt and Qualified Exempt Activities
- Historic Resource Protection (options)
- Additional Staff-Level Decisions

Priority #3: Update code standards that are difficult to interpret, do not add value, or are unduly cumbersome.

- Code Interpretations and Clarifications
- Focus Staff Time on High-Value Work (update procedure ordinances)
- Organize Code Reference Documents

Priority #4: Prioritize public communication and customer services.

- Virtual Front Counter
- Customer Service Policy
- Stakeholder Coordination

Priority #5: Expand tools for staff development and training.

- Expand Training and Delegation (phase 3)
- Refine Performance Management Systems (phase 3)

Priority #6: Maintain adequate and dependable funding to support quality application reviews.

- Cost Recovery Goal for Application Fees
- Expense Monitoring
- Potential Fee Changes (options and recommendations)

## Priority Topic #1

### Establish more efficient, consistent, and predictable application review processes.

Action Plan Assessment Summary: Stakeholders reported significant delays, inefficiencies, and inconsistencies with application review procedures. Improvements could be made by establishing written procedures detailing the appropriate application review processes, by enhancing application requirements and intake procedures, by increasing automation and delegation, and by maintaining sufficient funding for timely project reviews. Targeted regulatory and procedure changes would supplement these organizational improvements.

Establishing more consistent and efficient application review practices should be the primary strategy to minimize project review timelines, however targeted fee and staffing increases are also recommended.

Long term improvements planned for the Accela and LT Info systems should prioritize development of a more efficient framework where property and project information is verified and input once, then used consistently for TRPA's public information platforms, research and analysis functions, and application approval templates. Over time, the system should evolve to have certain permitting decisions auto-generated based on property and application inputs.

Actions Items Addressed: Recommendations address the following Projects and Action Items.

#### Project 1: Provide Temporary Resources to Complete Projects

*Action 6E: Identify staff and consulting resources to help relieve the current backlog of project applications and establish teams to implement this Action Plan.*

#### Project 4: Establish Shared Forms and Templates for Permitting Documents

*Action 1B: Use shared templates and forms with standard language for all application review and decision documents.*

#### Project 5: Review and Update Staff Teams for Application Reviews

*Action 1G: Maintain dedicated staff teams responsible for the timely review of certain application types, including a team for timely review of identified minor applications.*

#### Project 7: Prepare a Comprehensive Administrative Procedure Manual for TRPA Permitting

*Action 1A: Outline standard application review, inspection, and monitoring practices (including timeline expectations for different application types) in a comprehensive, written, and publicly available procedure manual to be maintained over time. This manual would be used by all project reviewers and for staff training purposes.*

Future Work on additional improvements will begin around August 2023 following approval of the administrative procedure manual and other near-term process improvements. Future work will address the following Project and Action Items:

#### Project 10: Improve Application Content, Forms and Templates

*Action 1C: Increase use of technology to automate and standardize the mechanical steps necessary for permit issuance. This may be a multi-step process with near term automation of*

*certain application and decision documents, and more significant longer term technology enhancements to the Accela and LT Info Systems.*

*Action 1D: Establish more detailed application forms that outline additional submittal requirements and formats to facilitate efficient project reviews.*

*Action 1E: Expand the application intake process to verify that all required application material is properly completed (using an enhanced checklist) before assigning cases to planners. In conjunction with the enhanced intake process, convert the 30-day application completeness reviews to a preliminary project review, where questions, additional information needs, and any major concerns are identified.*

*Action 1F: Strengthen applicant responsibilities to provide accurate information by requiring signed and notarized applicant affidavits, wet-stamped plans at least for land capability and coverage calculations, and/or clearly identified changes in plan sheets associated with permit revisions.*

Temporary Resources to Complete Projects: TRPA has continued to increase permitting staff with a combination of new hires, consulting agreements, and staff reassignments. A new shorezone planner was hired and trained in late 2022.

TRPA has also resourced this organizational improvement project by extending my consulting agreement, providing staff assistance from other TRPA departments, and assigning Principal Planner Tiffany Good to be the staff lead for implementation. Tiffany's time was mostly committed to application reviews and staff training through 2022. She has more time planned for work on this improvement project in 2023.

The Action Items for this priority topic include a suite of operating improvements to be implemented with clear written material. Tiffany will be managing these efforts and additional experienced staff will be transferred into the department to make this possible.

Establish Shared Forms and Templates for Permitting Documents: Permitting staff currently use a variety of forms, templates, and review protocols for application reviews. A more consistent approach to project permitting should reduce applicant confusion and the resulting need for additional conditions of approval, plan revisions, etc.

This initial project will establish shared templates and forms with standard language for application review letters, review checklists, standard condition language, and permits. This information should be shared on a common drive and used consistently for application reviews.

The differing formats and approaches used by permitting staff will need to be addressed with this effort. Inconsistencies will need to be resolved, with a preferred approach identified.

Shared Forms and Templates will be established by March 2023 and used as the starting point for additional improvements.

Improved forms and review methods are proposed for Minor Applications (Project 8). These improvements will be implemented in August 2023.

Additional improvements are planned for all application types with Project 10 (Improve Application Content, Forms and Templates). These improvements will be implemented in February 2024.

Review and Update Staff Teams for Application Reviews: This effort will establish staff teams for different types of application reviews, similar to the current system for shorezone projects.

Dedicated staff teams are planned for customer service functions (Project 2) and for the review of minor applications (Project 8). The teams will improve consistency and predictability for applicants. TRPA will benefit from increased staff training, mentoring, managerial efficiency, and delegation of work to lower-level positions. Implementation is planned between March 2023 and August 2023.

Prepare a Comprehensive Administrative Procedure Manual for TRPA Permitting: TRPA can significantly improve the consistency, efficiency, and predictability of permitting operations by establishing clear written guidelines for application review, inspection, and monitoring practices.

The manual will detail efficient and consistent protocols to be used by permitting staff, including review steps, timelines, checklists, conditional permits, permit acknowledgement, etc. This manual will be maintained for use by all project reviewers, for staff training purposes, and as a publicly-available resource that applicants can reference to better understand the TRPA permitting system. Implementation is planned in August 2023.

Additional Administrative Improvements: Other frequent suggestions from staff involve administrative system changes that would improve operating efficiency, but do not involve the focus areas for this project (code amendments and permitting department practices). The following topics should be considered for system improvements:

- Mobility Mitigation Fees are fine-tuned to assess fees based on expected Vehicle Miles Travelled (VMT). To calculate fees, staff uses the online Transportation Project Impact Assessment (TPIA) tool that estimates VMT based on detailed land use criteria and the project location. The TPIA tool can be confusing and difficult to use. Staff reports a lot of time spent calculating mobility mitigation fees, with assistance from staff specialists often required. TRPA should consider either updating the TPIA or implementing mobility mitigation fees with maps and spreadsheets instead of an online tool. A TPIA workshop with the Governing Board's Regional Plan Implementation Committee is planned for Spring 2023 and will identify potential changes to the tool.
- Payment Procedures are reported to be cumbersome and time consuming for applicants and for staff. Staff spends considerable time setting up invoices and sending instructions for each customer payment. Accela improvements should include a payment system that more closely resembles typical online payment systems used by businesses. Ideally, the system would allow users to select and process payments without direct staff involvement. A credit card option for security fees should also be considered.

## Priority Topic #2

### Simplify and shorten review processes for minor applications and sequential approvals

Action Plan Assessment Summary: Stakeholders reported similar application review timelines (150 days) for very simple applications and for highly complex projects. Changes should be made to establish simpler processes and shorter review timelines for minor and generally straightforward applications; which should include but not be limited to: development right transfers, lot line adjustments, minor property improvements, and minor revisions to approved plans. Additionally, TRPA should expand the list of non-impactful improvements that are exempt or qualified exempt from TRPA review; and permit administrative approvals for additional routine determinations that do not warrant a higher level of review.

Actions Items Addressed: Recommendations address the following Projects and Action Items.

#### Project 8: Minor Applications and Bundling

*Action 2A: Establish eligibility criteria, shorter review timelines, and simplified processes for minor amendments to approved permits, minor improvement applications, and other applications that should not require extensive staff review timelines.*

*Action 2B: Allow the bundling and/or concurrent processing of certain applications that are currently processed sequentially. Examples include transfer applications, parcel boundary adjustments, etc.*

#### Project 9: Simplify Certain Application Processes

*Action 2C: Expand the list of activities that are exempt or qualified exempt from TRPA review to include additional non-impactful improvements.*

*Action 2D: Permit staff-level approval for additional routine determinations that do not warrant a higher level of review. Examples include modification of historic buildings, projects in mapped avalanche areas, certain road projects, etc.*

Minor Applications: With a few exceptions, TRPA application review timelines are the same (30 days + 120 days) regardless of application type or complexity. The following list includes relatively simple applications that should be processed with shorter deadlines, less complex applications, simplified reviews, and a dedicated application review team. These applications will generally be routine, non-impactful, and appropriate for review by lower-level staff. Applications that require complex reviews or special findings should not qualify.

Minor Applications should include:

1. Development Right Banking
2. Conversions and Transfers of Banked Development Rights
3. Coverage Banking from Non-Sensitive Land
4. Transfers of Banked Coverage from Non-Sensitive Land
5. Historic Resource determinations, to the extent these are not integrated into the permit review process (see recommendations below).

6. Lot Line Adjustments meeting all the following criteria:
  - a. The adjustment is between two parcels
  - b. The adjustment is an equal area exchange, with existing parcel areas maintained to the nearest square foot
  - c. The exchanged areas do not include any land coverage
  - d. The exchanged areas have the same Land Capability Classification
  - e. The project area is located entirely outside of the shorezone/shoreland
7. Minor Site or Building Improvements meeting all the following criteria:
  - a. The project is a single parcel application
  - b. The project area is classified as Residential, Mixed-Use, or Tourist Land Use
  - c. The project area is located entirely outside of the shorezone/shoreland
  - d. The project does not propose any new or relocated coverage on sensitive land.
  - e. The parcel has an existing BMP certificate; except revisions to approved permits may be Minor with a BMP certificate to be issued with project completion.
  - f. The project will not add “additional building height” (above 26 feet).
  - g. The project does not involve a non-conforming use or structure.
8. Grading not exceeding 10 cu. yards on sensitive land and 50 cu. yards total.
9. Sign permits for projects having no more than two signs with sizes not exceeding 40 sf each.
10. Linear Public Facility repair or reconstruction projects resulting in no new coverage and no significant changes to finished grades.
11. Public Health and Safety Facilities; unless staff determines that the project scale or complexity warrants regular project review.
12. Fire mitigation projects for pipelines and power transmission facilities, if outside scenic areas; unless staff determines that the project scale or complexity warrants regular project review.

Staff will need to differentiate “minor” from “regular” applications upon submittal. This will require updated application forms and a new field in the Accela permitting software to indicate if applications are minor or regular.

Timelines for minor application completeness reviews should be decreased from 30 days to 15 days. Timelines for decisions should be decreased from 120 days to 40 days.

To reduce application preparation and review costs, qualifying applications should not require a findings analysis and permits should reference standard pre-drafted findings.

Review checklists should be simplified to reduce staff time spent manually entering the same project information in multiple documents.

Permit templates should include a standard description format and standard conditions addressing temporary and permanent BMPs, building height, land coverage, and other topics that are routinely conditioned. Standard notes, installation details, coverage table formats, and instructions should be provided online with the application forms to help applicants understand these general requirements and include the information in their applications.

These changes should reduce application preparation costs, improve application quality, and allow staff to process applications more efficiently and consistently. In most cases, the planner would review the project description and plan sheets, enter basic project information in the checklist and permit, delete standard conditions that are properly addressed in the preliminary plans, and issue a conditional permit. With fewer conditions, the permit acknowledgement process should also be simplified.

These application improvements should be implemented for minor applications in August 2023. Similar changes should be considered for broader implementation in 2024 as part of Phase 3, Project 10 (Improve Application Content, Forms, and Templates).

Minor applications should also be a priority for further simplification and possible automation of the mechanical steps required for permit issuance. For example, an applicant provided checklist could be used to autofill a standard permit form. This would focus staff time on reviewing application materials and implementing corrections with checklist edits and selection of permit conditions from a preset list.

Bundled and Concurrent Applications: The need for sequential application approvals can significantly increase the total review time for certain projects.

To improve reviews and reduce the combined processing time for projects requiring sequential applications, procedures should be implemented to review and approve certain “bundled” applications in a combined and coordinated manner. Review timelines for the longer of the bundled applications should apply. All fees and case assignments in the Accela permitting software should remain. Application bundling should be optional for applicants.

Bundling should be allowed for:

1. Development right transfers and conversions to enable project permits
2. Coverage transfers to enable project permits
3. Lot Line Adjustments to enable project permits
4. Historic Resource determinations with project permits

Exempt and Qualified Exempt Activities: TRPA Code Section 2.3 identifies activities that are Exempt from TRPA review. Some of the Exempt activities are further classified as “Qualified Exempt (QE)” in subsection 2.3.6. Additional Exempt and QE activities in the shorezone are identified in sections 82.4 and 82.5.

Numerous staff members and stakeholders reported that the current QE review process is time consuming and does not add value, especially for simpler activities and work outside the shorezone and shoreland. Other staff noted that improvements requiring project approval are

often caught through the QE review process, which provides value for code enforcement purposes.

Reducing the amount of staff time spent on QE reviews is a significant improvement opportunity.

QE Activities are generally minor improvements such as small-scale grading, building repairs, interior remodels exceeding the \$40,000 limit to be fully exempt, and small additions that do not add or relocate land coverage.

In the shorezone, QE Activities also include maintenance of existing piers, fences, etc.

QE Activities are only exempt from TRPA review following submittal of a property owner certification at least three days prior to construction (5 days in the shorezone). In the certification form, the property owner must properly declare that the activity fits within the listed QE categories and limitations. Coverage may not be created or relocated. Mitigation fees are required with some QE Certifications.

Code language and application packets do not identify a TRPA approval step for QE activities, but I understand it has become standard practice to review QE submittals for activities that require project approval. The Certifications are not stamped as accepted by TRPA until the reviews are complete. The reviews often take more than 3-5 days. If staff does not agree that the activities qualify, the Certifications are not accepted.

TRPA collects a fee of \$197 for QE Declarations involving structural modifications, which may also require excess coverage mitigation fees. \$335 is charged for shorezone QE Declarations. Fees are not collected for other QE Declarations. Fee collections are well below the actual cost of current review practices. For a fiscally sustainable system, the administrative process should be simplified or submittal fees should be significantly increased.

I recommend TRPA take a two-pronged approach.

First, the least significant QE activities should be made fully exempt from TRPA review.

Detailed recommendations were prepared by TRPA Code Compliance Manager Steve Sweet. His table is provided in Attachment A, with recommended adjustments to his suggestions.

Improvements that would be moved from QE to fully Exempt include:

1. Structural repairs under \$21,000
2. Structural modification required by local building departments
3. Additional grading on non-sensitive land (increased from 3 cu. yards to 10 cu. yards).
4. Seasonal Outdoor Retail Sales Use
5. Subdivision Identification Signs
6. Replacement of Approved Sign Faces

Second, TRPA should adjust administrative practices and process QE Declarations consistent with Code language. These are minor improvements and should not require a TRPA approval

process. The staff time that is currently spent on QE reviews would be better spent reviewing project applications or working on organizational improvements. Violations can be addressed with standard code enforcement tools. To cover processing costs, existing fees (\$197 standard, \$335 in the shorezone) should be applied to all submittals.

For shorezone submittals, the current application fee can fund an efficient screening process for potentially impactful improvements.

In all cases, QEs should be processed as property owner certifications that are accepted and stamped upon submittal and only require further action if flagged through the post submittal screening process.

TRPA should also make it clear to stakeholders that TRPA acceptance of QE Declarations does not involve a review and verification process and cannot be relied upon to avoid enforcement for any violations that may be created. The application forms and acceptance stamps are already pretty clear about this, but a lot of stakeholders (staff and applicants) view QE Declarations as a form of TRPA approval. This has blurred the distinction between TRPA Projects and Exempt Activities.

In addition to the time saved with this procedural change, the burden to certify that the work is exempt will be more clearly vested with the property owner as outlined in code. This should reduce the number of submittals seeking a de-facto TRPA approval through the QE Declaration process.

Implementing these changes should save about 5 weeks per year in TRPA staff time.

Historic Resource Protection: The current process for Historic Resource protection is widely viewed as overly cumbersome and ineffective.

Code defines “eligible historic resources” broadly and indirectly to include all structures over 50 years in age. Modifications are prohibited prior to either 1) TRPA staff approval of a Historic Resource Determination of non-eligibility, or 2) TRPA Hearings Officer approval of improvements, with a resource protection plan.

TRPA does not accept project applications prior to approval of Historic Resource Determinations (“HIST” cases). This adds another sequential step to the review process for many home improvements.

Fees are not collected for Historic Resource Determinations, unless the structure is determined to be eligible for designation. For permits involving eligible structures, fees are increased by \$1,325 plus a 140 percent fee multiplier for Hearings Officer review.

When properties are determined to have some historical significance, I understand the Hearings Officer reviews are time consuming and issues are typically addressed in a standard manner.

Many stakeholders suggested substantive policy changes for historic resource protection, which would be outside the scope for this project.

Because this has emerged as a significant recurring issue and opportunity, options are outlined below for different levels of change. The TRPA Governing Board should consider policy options for this topic. If changes like those in the Option 2 or Option 3 category are desired, a separate public process may be warranted to consider these and other suggestions.

Option 1: Minor Refinements would streamline permitting processes, but not change the eligibility criteria for Historic Resource Determinations. Recommended changes include:

- Establish a more efficient process for Historic Resource Determinations. I suggest TRPA allow these determinations to be made as part of the regular permitting process. The application forms should disclose the possibility of added fees and design requirements if the property is historically significant. Potential applicants could also request a pre-application determination similar to the process that currently exists. This is a change to administrative practice – no code amendments are needed.
- Authorize staff approval of additions, reconstruction, or demolition of *eligible* historic resources, subject to design standards. This would retain Hearings Officer reviews for modifications to *designated* historic resources. Code amendments will be required.

Option 2: Mid-Level refinements would supplement the Option 1 process improvements with a reduction in the number of properties subject to Historic Resource Determinations. Changes could include:

- TRPA could stop requiring Historic Resource Determinations for modifications to structures built after 1945 (or some other date), possibly with limitations.
- Separately or in combination with the above, TRPA could work with another agency to identify historic areas or districts and only require Historic Resource Determinations for structures in those areas.

Option 3: High-Level refinements would involve TRPA fully deferring to state and local agencies for historic resource protection.

Staff-Level Decisions: Stakeholders suggested that the following additional applications could be approved at the staff-level without significant adverse impacts.

- Additions, reconstruction, or demolition of *eligible* historic resources, as discussed above.
- Remove special use permit requirements for homes proposed outside of mapped avalanche hazard areas. The Washoe County Area Plan maintained old plan area statement provisions requiring special use permit review for all homes in certain planning areas (now zone districts). The requirement was added because portions of those plan areas include avalanche hazard areas. The actual avalanche hazard areas are now known to be much smaller than the plan areas. This is a suggestion for Washoe County to process with their next Area Plan update. The County could also adopt standards reflecting typical conditions of approval and drop the special use permit requirement entirely.

- Expand exemptions for hearings officer review of SEZ disturbances to permit staff approval for underground utility replacement projects.
- Permit staff approval of added land coverage for qualifying transportation improvements.
- An additional decision for TRPA involves shorezone approvals. The recommendation is to leave processes unchanged due to the sensitive locations and relative newness of ordinances. However, staff and stakeholders identified good opportunities to increase efficiency by establishing staff-level approval options for shoreline protective structures (which typically function as BMPs) and for new single-parcel and multiple-parcel pier applications (with public noticing and appeals retained to match the current process for pier extensions).

### Priority Topic #3

#### **Update code standards that are difficult to interpret, do not add value, or are unduly cumbersome**

Action Plan Assessment Summary: *The TRPA code is complex and can be confusing. Near term, TRPA should codify prior administrative interpretations, clarify code language where needed, and provide access to applicable plans, codes and reference information in a common location. Longer-term, TRPA should continue to pursue major ordinance changes to be less cumbersome to administer, more effective in protecting environmental resources, and more consistent with broader goals. Improvements could be made to the standards for land coverage, storm water management, building height, scenic resource protection, and subdivisions.*

Actions Items Addressed: Recommendations address the following Project and Action Items.

#### Project 6: Code Interpretations, Clarifications, and Efficiency Improvements

*Action 3A: Codify administrative interpretations on a regular (annual) basis, including clarification of details consistent with prior determinations.*

*Action 3B: Organize applicable plans, codes, and reference documents in a common location that is easier for applicants and project reviewers to locate.*

*Action 3C: Update Code standards to focus staff time on high-value work.*

Code Interpretations and Clarifications: Many of TRPA's ordinances are difficult to understand and implement. A variety of interpretations and implementation approaches have been developed over the years, but the code has not been amended to reflect these interpretations. Unclear code provisions are impacting the efficiency, consistency, and predictability of application reviews.

TRPA should process code amendments to address prior interpretations and understandings. This will make ordinances easier to understand for project applicants and for staff. Some interpretations are documented in writing, but others are not.

TRPA should also establish an ongoing process to track future code interpretations and regularly incorporate those interpretations into code language. This list should be inclusive and not limited to major issues or controversies. TRPA should strive to make all ordinances clear, concise, and consistent with administrative practices.

I reviewed TRPA's "Catalog of Existing Guidance Memos, Code Interpretations, Etc." This list references a variety of memos, agreements, administrative policies, guidance documents, and code interpretations. There are 141 topics on the list dating back to 1987.

Some of the cataloged items address important code interpretations. Others provide procedural guidance. Some topics may no longer be relevant. The list should be reviewed and sorted into four categories:

- Items that interpret and/or clarify code requirements that still exist should be addressed with code amendments and removed from this list. A separate code interpretation list should be maintained for future use.
- Guidance on procedures should be addressed in the administrative procedure manual and removed from this list.
- Items that apply to codes or topics that are no longer relevant should be removed from this list.
- The remaining list of information, including numerous legal memos, should be retained as administrative reference material.

The existing catalog includes noteworthy code interpretations, but it is not comprehensive. Additional topics that should be clarified in code are addressed below.

These clarifications include TRPA's fundamental development limitations – land coverage, building height, and scenic standards for the shoreland. The ordinances are too complex and are overly reliant on criteria that are not easily measured. A lot of staff and applicant time is spent dealing with interpretations of these basic development limitations.

The scope of this project is to clarify the ordinances to enhance efficiency, consistency and predictability. Broader code updates should be considered in the future.

1. What is land coverage? This should be clarified.

The definition of land coverage is broad, using phrases such as “prevents normal precipitation from directly reaching the surface of the land” and “shall not be considered as land coverage if it permits at least 75 percent of normal precipitation directly to reach the ground and permits growth of vegetation on the approved species list.”

The criteria for this fundamental development limitation are not measurable. As a result, staff have used a series of interpretations and rules of thumb to apply land coverage regulations to accessory site improvement features such as post foundations, masonry walls, elevated metal grates, placed rocks or boulders, and BMP installations.

The definition of land coverage should be expanded to include dimension standards and other criteria for small site improvements.

2. When is land coverage “Available” vs “Banked”? When properties install BMPs and become eligibility for coverage credits, total coverage can be reduced with permit approval. Code does not specify if this treated as Available (water quality mitigation required for use), or Banked (water quality mitigation not required for use). I understand the preferred interpretation is that this becomes Banked land coverage.
3. Building Height? TRPA has unusually complex building height ordinances. For this project, rounding methods and the proper method to measure “Slope Retained Across Building Site” should be clarified in code. Criteria for segmented building height standards on slopes should also be clarified.

4. Non-Permanent Structures? Qualifying criteria for coverage exemptions should be clarified, consistent with prior interpretations.
5. Scenic Impacts? The criteria for rating scenic quality and assessing potential impacts could be clarified for projects outside the shorezone/shoreland regulatory areas.
6. Rounding? Rounding standards should be addressed for TRPA's key development limitations. Overall development potential is impacted by undocumented rounding rules for building height calculations, for land coverage features, and for the contrast rating scores used to determine the allowed visual mass for lakefront development. Rules for rounding should be addressed with additional language in Section 90.1 (Rules of Interpretation and Construction) and in the individual code sections and reference documents.
7. New Shorezone Ordinances? When new ordinances are adopted, the first few years of implementation often reveal topics that could be addressed with greater clarity. Several shorezone ordinance provisions have required significant discussion and interpretation. Code amendments should be processed to clarify requirements. Topics below have been identified for possible clarification.
  - Visible Mass Calculations for Piers should be clarified, including visible mass viewpoints (side + end), qualifying features to include, calculation method, and acceptable mitigation methods. I understand the standard visible mass for a standard boatlift has been interpreted to be 84 square feet.
  - Boulder relocation standards should be clarified in relation to dredging.
  - Pier expansion criteria should be clarified in relation to boatlifts, hand railing for safety purposes, etc.
  - Criteria for property line projections and pier orientation should be clarified. TRPA could also map standard property line projections and outline criteria for exceptions.
  - Possible clarifications to buoy standards.

Focus Staff Time on High-Value Work: In discussions with staff, certain code-required tasks have been raised repeatedly as low priorities for limited staff resources. Some of these are addressed with the permitting process improvements outlined above, but others involve administrative and oversight work.

To improve organizational effectiveness, TRPA should implement changes to reduce the time spent on low-value administrative work and prioritize more important matters. The recommended code amendments are listed below. These changes should eliminate about 12 weeks of work for TRPA planning staff each year with no significant impact on outcomes or thresholds. Administrative costs for other permitting agencies would also be reduced.

1. IPES Parcels with scores "below the line" are addressed with redundant programs. Section 50.5.2.A dates from the 1987 Regional Plan and Code. It requires that ten percent of the allocations distributed to local jurisdictions each year be held back for a

below the IPES line drawing. The program allows the owners of sensitive parcels to deed restrict the parcel and transfer the awarded allocation to a buildable parcel. This is a labor-intensive process for staff involving mailed notices to all qualifying property owners (over 500). It causes a lot of confusion for property owners and a lot of calls to staff. I understand there have been no transfers under this program for several years.

More recently, a program was put in place that allows a below the IPES line parcel to retire a sensitive lot in exchange for an allocation from the Residential Allocation Incentive Pool (Section 50.5.1.D.1). The transfer may occur at any time. This program provides the same outcome for property owners and for the environment, but without the cumbersome process. Residential Allocation Incentive Pool is replenished annually with ten percent of allocations. On January 18, 2023, there were 85 allocations available.

These programs should be consolidated under the Residential Allocation Incentive Program.

2. Permit Monitoring and Compliance Audits are required annually for a sample of permits issued in Area Plans (Section 13.8.3) and as part of the performance review system for the distribution of residential allocations (Section 50.5.2.E.3). Performance review audit procedures are extensive, so most staff time is spent on the single family audits. The annual Area Plan audits focus on more complex projects and should continue.

Section 50.5.2.E.3 currently requires audits for 10 percent of the single family development permits issued each year; and the scoring system requires a minimum of 10 audits. As a result, TRPA does at least 10 winterization audits, 10 final inspections audits, and 10 permit review audits per jurisdictions.

Audit results are used to determine the number of residential development allocations distributed to the counties and city each year. Allocations are reduced if audit scores drop below 90 percent or 75 percent.

10 percent is a high audit rate. For example, the IRS is reported to audit about 0.4 percent of federal tax returns. The auditing process requires a lot of staff time for TRPA and for other permitting agencies. TRPA staff work is estimated to total about 16 employee-weeks per year.

Reducing the single family auditing requirement to 5 percent annually would be a little less comprehensive, but it would significantly reduce administrative costs for TRPA and other permitting agencies. Participants believe that audits of five percent would be adequate for program purposes and would continue to flag permitting issues before significant environmental impacts are created.

In recent years, TRPA and the local agencies have focused more on education and coordination. Audit results have generally been positive and fewer issues have been uncovered in the audits. I understand the audit results this year do not warrant any allocation reductions.

Because 90 percent compliance is required before allocations distributed to local agencies are reduced, corresponding changes should also be made to use the last 10 audits of each type when calculating any allocation reduction (as opposed to results from a single year). This would maintain the current minimum standard of 90 percent compliance.

TRPA may also want to consider the value of self-audits and the appropriateness of using TRPA staff performance audits to calculate allocation reductions for the jurisdictions that have not assumed permitting authority.

3. The annual Area Plan and MOU review and recertification process (Section 13.8.3) is somewhat cumbersome, but it does provide an early warning if permitting errors are occurring. Review assessments could be reduced to every two years, possibly with call-up provisions if the annual audit results drop below a certain level.

Organize Code Reference Documents: The TRPA Code applies many regulations with references to different documents and datasets. The reference material is not all available from a common location. Some documents are current and updated, while others are decades old. Some reference documents are hard to find.

To improve operations for applicants and for staff, all information that is effectively “adopted by reference” should be compiled in a list and posted online with convenient links to each document.

*A Preliminary Table of Code Reference Documents* is provided in Attachment B.

There are a lot of reference documents – too many in my view. This complicates project reviews and reduces efficiency. In some cases, code could be improved by replacing document references with basic code standards. In other cases, the reference standards appear to address issues that are handled by other agencies and may not be relevant for TRPA reviews.

Before implementation, the *Preliminary Table of Code Reference Documents* should be reviewed. Where feasible, code amendments should be processed to reduce the number of different documents that need to be referenced during the Project application process. For the references that remain, convenient document links should be provided.

Long Term Code Improvements: The Design Review Guidelines should be updated and modernized – it is 35 years old and does not reflect current design priorities. Updates should clarify the design standards and be better integrated with the language in code.

More significant changes to some of TRPA’s fundamental ordinances (land coverage, building height, scenic resources, etc) should also be considered. TRPA staff has been researching options to convert the code from a predominantly hardcopy static document posted online to a more user-friendly code that is designed from the outset as an online interactive document. The TRPA Governing Board should consider initiating a comprehensive code update as part of that effort.

## Priority Topic #4

### Prioritize public communication and customer services

Action Plan Assessment Summary: *Stakeholders reported inconsistent customer services and challenges with the conversion to remote work. Action Items prioritize effective public communications and consistent customer services in an in-person, remote, or hybrid work environment.*

Action Items Addressed: Recommendations address the following Project and *Action Items*.

#### Project 2: Enhance Customer Service Protocols

*Action 4A: Establish a virtual front counter with dedicated staff more readily available to answer public inquiries as they are received, or shortly thereafter.*

*Action 4B: Emphasize customer service as an organizational priority by distributing and implementing a customer service policy, to include expectations for availability and responsiveness.*

*Action 4C: Establish a project review working group for ongoing stakeholder coordination related to this initiative, and the permitting process in general.*

Virtual Front Counter: The permitting department is preparing to assign an associate planner to work full time as TRPA's customer service planner starting in March 2023. The position will be responsible for managing public inquiries and will replace the current rotation of planners covering that work. Management will need to reassign cases from the new customer service planner to the other planners and establish plans for backup coverage for vacation and sick days, busy periods, etc. TRPA should assign a second planner to be the primary backup for the customer service planner, effectively creating a customer service team. The team could also include a shorezone specialist. This system should be evaluated for about 6 months, and refined over time if needed.

This important position will have a lot of communication with the public and should represent the agency well. In addition to standard duties, the customer service planner should use information learned through public communications to help the management team identify and implement continuing improvements for the permitting process.

Together with this change, TRPA should implement additional measures to address customer inquiries in a more efficient and customer-oriented manner. I recommend three improvements:

- Establish a dedicated phone number and email address for general permitting questions. The contact information should be easy to remember (eg [permits@trpa.gov](mailto:permits@trpa.gov)) and well publicized. I understand the current system typically involves customers calling the main TRPA line, staff writing questions on a shared digital document, and a rotating schedule of planners assigned to respond to messages. Having consistent staffing with a dedicated phone and email line will be more helpful for customers, as they will be able to directly reach a subject matter expert whenever the customer service planner isn't

helping someone else. The system should also result in more consistent public information and reduced staff time for each reply.

- Publicize contact information so project applicants and other interested people can easily see which planner is reviewing each application. Questions about submitted permits should be directed to the reviewing planner.
- Standardize and publicize the pre-application meeting process. Anyone with more detailed pre-application project questions should be directed to the pre-application meeting process.

The resulting customer service options should be prominently posted at [trpa.gov](http://trpa.gov).

Customer Service Policy for Permitting Staff: A draft customer service policy is provided below. This simple outline addresses customer service protocols and expectations, including the above referenced enhancements. Once finalized, it should be included in the procedure manual, posted online, and used in evaluating individual employee performance.

Stakeholder Coordination: We will coordinate review/feedback meetings with local governing staff, the league, and an expanded group of permitting stakeholders. Review meetings are anticipated once every 3-6 months through the permitting improvement process, with initial meetings in February 2023.

If the stakeholder discussions are productive, they can continue semi-annually as a venue to discuss experiences and suggestions for the TRPA permitting process.

## **DRAFT Customer Service Policy**

*Customer Service Policy Statement:* TRPA permitting staff will be available to provide helpful, timely, and accurate information for project applicants and the general public.

*Contact Information:* General permitting inquiries should be directed to a Customer Service Planner at:

(ID Phone

And E-mail)

*Levels of Assistance:* The Customer Service Planner should answer questions and provide general information on permitting requirements. When more detailed assistance is requested, customers should be referred to pre-application meetings or other appropriate processes.

*Pre-Application Meetings:* For more detailed staff input on project concepts, pre-application meetings can be requested here (link to application). Potential applicants should submit preliminary project proposals and/or plans when scheduling pre-application meetings.

*Project Application Questions:* Questions about permit applications that are in-process should be directed to the reviewing planner listed here (link to case assignments).

*Standards for Staff Availability:* Staff should respond promptly to all inquiries. All messages should be returned within 24 hours, excluding weekends and holidays (1 business day).

*Standards for Voicemails:* Voicemail messages should be direct and friendly.

Sample Voicemail Message:

*Hi, this is (employee name).*

*I am currently unavailable. Please leave your name and number and I will return your call as soon as I can. You can also find permitting information at TPRA.gov*

*Thank you,*

*(employee name)*

*Standards for Emails:* Email messages should be direct, friendly and set to include the employee's standard TRPA signature line.

*Out of Office Protocols:* During vacations or other times when staff will be unable to return messages within 1 business day, "out of office" messages should be activated for phone calls and emails. Messages should be direct and include the date of return and an alternative contact for time-sensitive inquiries.

Sample Out-Of-Office Message:

*Hi, this is (employee name).*

*I will be out of the office until (day / date) and will return your (call or email) then.*

*If you need immediate assistance, please contact (backup name) at (phone) or (email).*

*You can also find permitting information at TPRA.gov*

*Thank you,*

*(employee name)*

## Priority Topic #5

### Expand tools for staff development and training

Action Plan Assessment Summary: *Increased training and delegation of work is recommended. TRPA should use written guidelines for review procedures and customer services as a training tool to enable more delegation of project review work, and to promote consistency in project review methodologies and outcomes.*

Actions Items Addressed: Recommendations will address the following Project and Action Items.

#### Project 11: Expand Training and Delegation

*Action 5A: In conjunction with a written procedure manual, increase delegation of less complex project review functions to less experienced staff members. Examples include form preparation, noticing, minor applications, etc.*

*Action 5B: Provide cross training to ensure that at least two staff members are fully trained on every review procedure.*

#### Project 12: Refine Performance Management Systems

*Action 5C: Integrate more detailed project review and customer service expectations into the performance management system.*

*Action 6A: Maintain management tools to regularly monitor workload demands and adjust budgeting and staffing levels to reflect changes in workload.*

Future Work Plan: This work will begin around August 2023 following approval of the administrative procedure manual and other near-term improvements.

## Priority Topic #6

### Maintain adequate and dependable funding to support quality application reviews

Action Plan Assessment Summary: *From my limited review, it appears that the current application fees – at least for some application types – do not fully recover the current cost of application reviews. TRPA should prioritize a near-term review and adjustment of application fees to more fully recover application review costs; along with continued staffing enhancements to complete delayed reviews.*

*Over time, the recommended efficiency improvements and enhanced management tools should reduce the administrative cost of application reviews. Workload, staffing levels, and fees should be regularly monitored and adjusted.*

Actions Items Addressed: Recommendations address the following Projects and Action Items.

#### Project 3: Adjust Application Fee Methods

*Action 6B: On a regular basis, review and update the application fee schedule and staff review expenses to fully recover costs associated with various types of application reviews.*

*Action 6C: Continue to evaluate and address potential incentives and disincentives for desired applications embedded within the fee schedule. Continue subsidizing application fees for affordable housing.*

*Action 6D: Work to establish a reserve fund during busy times to help cover fixed expenses during slower times.*

Cost Recovery Goal: TRPA should structure application fees to sustainably fund permitting program costs. This is a common and recommended practice.

In general, TRPA application and inspection fees are structured for cost recovery. Large projects pay higher fees and small projects pay lower fees. Intentional fee waivers are provided for special projects such as affordable and workforce housing.

In recent years, TRPA applications have increased rapidly – both in volume and complexity. Increases in complex shoreland and shorezone applications have been most notable. Staff have struggled to keep up with permit reviews, but funding limitations have prevented additional staffing increases.

Following additional discussions with staff and review of summary budget information, it is clear that the current permitting system is not achieving cost recovery at the program level. This is not fiscally sustainable, especially with high levels of permitting activity and limited funding from other sources.

Addressing permit review delays is a primary goal of the *Permitting Improvement Action Plan*. Delays should be addressed mostly with process efficiencies, as there are many opportunities to operate more efficiently and minimize the need for fee increases. However targeted fee adjustments are also recommended.

Certain application fees are significantly lower than the cost of reviewing those application types. Even with process improvements, these fees are unlikely to cover the cost of reviews. Recommended changes are limited to those fees that appear to be significantly out of balance, which mostly involve the shorezone and shoreland applications.

Topics that should be considered for fee rebalancing and/or reduction are also identified.

Specific topics are addressed below in the *Table of Potential Fee Changes*.

It is important to emphasize that the recommended fee adjustments will only result in cost recovery if substantial process improvements are also implemented.

Direct and Indirect Expenses: Application fees should fund efficient project reviews, inspections, and enforcement of permitted improvements; plus the proportional indirect costs attributable to the permitting program (agency overhead, administrative costs, etc.). TRPA also incurs costs for permit program coordination with other agencies, which should be funded with application fees including the fee transfers from other permitting agencies.

TRPA should decide if fee subsidies (e.g. affordable housing) should be funded with higher fees on other applications or with general fund allocations. I recommend the former.

Mitigation fees and security fees are used for other purposes and do not fund permitting operations. Changes are not proposed for mitigation fees or security fees.

Enhanced Expense Monitoring: Application fees and staff productivity measures should be based on review cost and review time estimates for different types of applications. TRPA monitors project review expenses at an aggregate level, but a detailed “time and expense” assessment has not been conducted in many years. Data are available in Accela for individual project review times, but that information has not been consistently input.

A more detailed time and expense assessment is recommended for the permitting program. TRPA staff should consistently record the total permit review and inspection times for each application (direct costs). This should be a required field in the Accela permitting software. Review work by other staff and consultants should also be tracked as direct costs. Reports could then be run with indirect expenses applied proportionally to get a reasonable estimate of review times and costs for different application types and categories.

The resulting cost estimates should be used to inform future fee schedule adjustments and as a baseline measure of application review efficiency. Review costs should decrease over time if the recommended process improvements are properly implemented.

The staff time estimates should also be included in the procedure manual and as a general benchmark for staff performance evaluations.

In the interim, personal experience, general input from permit reviewers, and small sampling of application fees were used to develop recommendations for initial fee recalibrations.

Simplify Organizational Documents: Fees are outlined in a comprehensive fee schedule, which is updated by resolution of the Board (generally on an annual basis). Some fees are also outlined in the Rules of Procedures, which is also updated by resolution of the Board. Inflation

indexes are listed for some fees, but not for others. To improve consistency and efficiency, updates should be made to the Rules of Procedure and related Code references to remove the redundant fee amounts, use a consistent inflation index for standard adjustments, and simplify administrative tasks related to periodic fee updates.

Existing Structure of Application Fees: Application fees are structured as follows:

- Fees for single family residential and commercial projects are paid in proportion to amount of added floor area.
- Multi-family and tourist accommodation fees are paid with a flat rate plus a per unit fee.
- Most other fees are at a flat rate with a deposit account, which I understand is only used in unusual situations.
- “Multiplier” increases are applied for governing board or hearings officer review, and for projects in special planning areas.
- “Multiplier” decreases are applied for major and minor revisions to approved plans.
- Additional fixed fees are paid for shoreline scenic reviews, BMPs, and an IT surcharge.

Proposed refinements maintain this basic fee structure.

Deposit Accounts: The fee schedule identifies a minimum fee and deposit account system for many of the less common application types. I understand that use of deposit accounts is limited to unusual situations due to the cumbersome nature of the deposit account system and the time required to setup and invoice deposit accounts.

Minimizing the use of deposit accounts makes sense. Criteria for the limited use deposit accounts should be outlined in the administrative procedure manual. Minimum fees should be recalibrated as needed to approximate typical review costs.

Potential Fee Changes: Current fee categories that do not appear to be recovering project review costs are identified below in the *Table of Potential Fee Changes*. Options and recommendations are provided for each fee category. Possible fee decreases and adjustments to fee-based incentives are also noted.

In aggregate, application fees for development in the shoreland and shorezone fall well short of the associated administrative costs. Fee increases are recommended for a number of shoreland and shorezone applications. In other areas, recommendations would recalibrate certain fees for a variety of reasons with no significant change to total fee revenue.

**Table of Potential Fee Changes**

Fee Topic	Issue	Options	Recommendation & Rationale
Shoreland Scenic Reviews	Shoreland scenic reviews typically require more work than is covered by the \$581 flat fee – especially the complex applications that maximize development potential on constrained lakefront properties.	<p>A. No Change.</p> <p>B. Increase the fee to recover average review costs.</p> <p>C. Apply a fee multiplier to recover costs and maintain lower fees for smaller improvements.</p> <p>D. Apply fee categories to recover costs based on the complexity of review standards.</p>	<p>Option D: Apply fee categories:</p> <p>\$1,000 for “Level 3” reviews and “Level 6” reviews.</p> <p>\$1,500 for “Level 4, Option 1” reviews.</p> <p>\$ 2,000 for “Level 4, Option 2” reviews and “Level 5, Option 1” reviews.</p> <p>\$2,500 for “Level 5, Option 2” reviews.</p> <p>This would apply higher scenic review fees for more complex applications, with a modest increase for minor improvements.</p>
Buoys and Floating Platforms	The current application fee (\$727 for the first 3 buoys and \$350 for each additional buoy) does not recover the cost of review.	<p>A. No Change.</p> <p>B. Increase the fee to recover costs.</p>	<p>Option B: The fee should be increased to about \$1,500 per buoy. This is an initial cost recovery estimate.</p>
Mooring Lottery Eligibility Reviews	The \$66 application fee does not recover the cost of review.	<p>A. No Change.</p> <p>B. Increase the fee to recover costs.</p>	<p>Option B: The fee should be increased to about \$350. This is an initial cost recovery estimate.</p>



<b>Table of Potential Fee Changes</b>																		
<b>Fee Topic</b>	<b>Issue</b>	<b>Options</b>	<b>Recommendation &amp; Rationale</b>															
Hotel, Motels and Timeshares and Multi-Family Residential	<p>Fees for new hotels, motels, and residential timeshares are lower than for new multi-family housing.</p> <p>This does not reflect the complexity of reviews, which is generally increased for lodging projects.</p> <p>This may also work against TRPA policy goals for housing.</p> <p>These fees should be recalibrated to better align with the complexity of reviews. Fees for lodging should be equal to or higher than for multi-family housing.</p>	<p>A. No Change.</p> <p>B. Increase the lodging fees.</p> <p>C. Decrease the multi-family Fees.</p> <p>D. Increase the lodging fees and decrease the multi-family fees.</p>	<p>Option D: Recalibrate fees with targeted increases and decreases.</p> <p>TRPA should reduce the base fee for new multi-family projects and increase the per-unit fees for lodging to match the per-unit fees for multi-family.</p> <p>The resulting fees are shown on the table below.</p>															
	<table border="1"> <thead> <tr> <th><i>Use type</i></th> <th><i>Base Fee (flat)</i></th> <th><i>Base fee (per Unit)</i></th> </tr> </thead> <tbody> <tr> <td><i>Multi-Family New</i></td> <td><del>\$3,195</del> <u>\$1,743</u></td> <td>\$59</td> </tr> <tr> <td><i>Multi-Family Addition</i></td> <td>\$1,743</td> <td>\$59</td> </tr> <tr> <td><i>Lodging New</i></td> <td>\$2,441</td> <td><del>\$43</del> <u>\$59</u></td> </tr> <tr> <td><i>Lodging Addition</i></td> <td>\$2,441</td> <td><del>\$43</del> <u>\$59</u></td> </tr> </tbody> </table>	<i>Use type</i>	<i>Base Fee (flat)</i>	<i>Base fee (per Unit)</i>	<i>Multi-Family New</i>	<del>\$3,195</del> <u>\$1,743</u>	\$59	<i>Multi-Family Addition</i>	\$1,743	\$59	<i>Lodging New</i>	\$2,441	<del>\$43</del> <u>\$59</u>	<i>Lodging Addition</i>	\$2,441	<del>\$43</del> <u>\$59</u>		
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Coverage Exemptions	<p>A lot of single family addition applications are proposing new coverage credits and exemptions (with BMPs) to authorize larger decks and driveways, with little or no added floor area.</p> <p>The \$558 minimum fee does not recover costs for these reviews.</p> <p>However, these applications are resulting in the installation of BMPs and other beneficial improvements.</p>	<p>A. No Change.</p> <p>B. Increase the minimum fee to recover costs.</p> <p>C. Apply an add-on fee for projects proposing new coverage exemptions for pervious driveways or decks.</p>	<p>Option A: No change.</p> <p>TRPA would retain a low minimum fee despite cost recovery challenges for this type of project.</p> <p>The BMPs and other requirements are significant applicant costs and are environmentally beneficial. Additional fees may discourage these projects.</p>															

**Table of Potential Fee Changes**

Fee Topic	Issue	Options	Recommendation & Rationale
<p>Qualified Exempt Declarations</p>	<p>This is addressed in the Recommendations to Simplify Certain Review Procedures (Project 9).</p> <p>Code outlines a procedure for TRPA to accept property owner declarations for certain “qualified exempt” activities at least 3-5 days prior to construction.</p> <p>However, it has been the practice of TRPA to review the certifications and effectively approve or deny the submittal prior to acceptance.</p> <p>The current submittal fees (\$197 for structural modifications, \$335 in the shorezone, and none for others) are well below the fees that would be needed to fund the current administrative process.</p>	<p>A. Maintain current practices and don’t raise fees. Expenses would continue to be paid from other sources.</p> <p>B. Maintain low fees and establish streamlined administrative practices consistent with existing code language.</p> <p>C. Maintain current practices and raise fees to fund reviews.</p>	<p>Option B: My recommendation is to apply current fees to all QE Declarations and to begin processing QE Declarations consistent with code language and at a level commensurate with the submittal fee.</p> <p>This issue is addressed in more detail under priority topic #2.</p> <p>If TRPA decides to retain the current administrative process for QE Declarations, code should be amended to reflect that practice and fees should be increased to about \$400 for standard QE Declarations and \$700 in the shorezone.</p>

<b>Table of Potential Fee Changes</b>			
<b>Fee Topic</b>	<b>Issue</b>	<b>Options</b>	<b>Recommendation &amp; Rationale</b>
25 Percent Fee Increase in Special Planning Areas	<p>The fee schedule applies a 125% fee multiplier to Projects in community plan areas, and in redevelopment, specific and master plan areas. This was originally intended to reflect the complexity of these pre-2012 regulatory documents.</p> <p>I understand the 125% multiplier is also being charged in the recently-adopted Area Plans.</p> <p>These areas include the Centers that have been identified as priority areas for environmental redevelopment. The added fee may be working against this goal.</p> <p>Additionally, outlying areas within Area Plans now have fees that are 25% higher than comparable properties in jurisdictions that have not adopted area plans, raising questions of equity.</p> <p>Area plans are not as complex as the old planning documents and should not increase typical review times.</p>	<p>A. No Change.</p> <p>B. Eliminate the 125% multiplier and absorb lost revenue with proportional increases for all project fees.</p> <p>C. Implement Option B plus a multiplier decrease (perhaps 10%-25%) in Centers of conforming Area Plans.</p>	<p>Option B: Eliminate the 125% multiplier and absorb lost revenue with proportional increases for all project fees.</p> <p>This would apply application fees consistently to all projects in the Lake Tahoe Region. Projects within Area Plans and other infill areas would stop paying higher fees than projects in the old Plan Area Statements.</p> <p>The change would be revenue neutral for TRPA. Projects in Area plans and the remaining community plan areas would pay a little less for applications. Outside these plan areas, applicants would pay a little more.</p> <p>Option C would provide an additional incentive for projects in Centers, which is also a reasonable approach. However, the additional lost revenue would need to be addressed with higher fees outside centers.</p>

**Attachment A:**

**Steve Sweet’s table of QE Recommendations, with Notes**

Existing Qualified Exempt Activities	Recommendation
<b>General Activities</b>	
<p><b>Structural Repair</b>            Structural repair of existing structures of less than \$21,000 per year, provided there is:</p> <ul style="list-style-type: none"> <li>a. No excavation, filling, or backfilling in excess of that exempted by subparagraph A.6 below;</li> <li>b. No increase in the dimensions of a structure;</li> <li>c. No intensification or change in use;</li> <li>d. No increase in commercial floor area, and</li> <li>e. No increase in density.</li> </ul> <p>This amount shall be calculated on an objective market valuation of the materials involved.</p>	move to exempt
<p><b>Structural Modifications</b>            Structural modifications to existing structures required to comply with applicable building department, provided:</p> <ul style="list-style-type: none"> <li>a. Documentation by the local building department is submitted to TRPA;</li> <li>b. The modification is the minimum necessary; and</li> <li>c. There is:               <ul style="list-style-type: none"> <li>(i) No excavation, filling, or backfilling in excess of that exempted by subparagraph A.6 below;</li> <li>(ii) No increase in the dimensions of a structure visible from any TRPA-designated scenic threshold travel route;</li> <li>(iii) No height created greater than that allowed by Table 37.3.1-1;</li> <li>(iv) No intensification or change in use, and</li> <li>(v) No increase in commercial floor area.</li> </ul> </li> </ul>	move to exempt

Existing Qualified Exempt Activities	Recommendation
<p><b>Structural Remodeling or Additions</b>  Structural remodeling or additions to existing structures, provided:</p> <p>a. There is:</p> <ul style="list-style-type: none"> <li>(i) No excavation and backfilling in excess of that exempted by subparagraph A.6 below;</li> <li>(ii) No increase in the dimensions of a structure visible from any TRPA-designated scenic threshold travel route;</li> <li>(iii) No height created greater than that allowed by Table 37.3.1-1;</li> <li>(iv) No intensification or change in use;</li> <li>(v) No increase in commercial floor area;</li> <li>(vi) No increase in density; and</li> <li>(vii) No increase in existing hard coverage.</li> </ul> <p>b. A BMP retrofit plan and compliance schedule as set forth in Chapter 60: Water Quality, is submitted to TRPA;</p> <p>c. All excess coverage mitigation requirements, if any, are satisfied in accordance with Chapter 30: Land Coverage; and</p> <p>d. There is existing paved access and parking.</p>	<p>take out addition and move to exempt</p> <p><i>Arlo comment:</i></p> <p><i>Excess coverage mitigation and BMP retrofits will be reduced if remodeling is made Exempt.</i></p> <p><i>If my QE process recommendations are both implemented, this should remain as QE, which would retain standards for BMPs and coverage mitigation, while simplifying processes.</i></p>
<p><b>Non-Permanent Structures</b>  Non-permanent structures meeting the requirements of subparagraph 30.4.6.A, provided a land capability verification has been completed in accordance with Section 30.3 and TRPA has verified that all land coverage on the parcel was legally established in accordance with the definition of “Existing” in Section 90.2.</p>	<p>Leave as QE</p>
<p><b>Replacement of Existing Mobile Home</b>  Replacement of an existing mobile home in a legally established mobile home space that does not result in a change in use or additional land coverage.</p>	<p>Leave as QE</p>

Existing Qualified Exempt Activities	Recommendation
<p><b>Excavation, Filling, or Backfilling</b>  Excavation, filling, or backfilling for an area not in excess of seven cubic yards is exempt provided the activity occurs during the grading season (May 1 to October 15) in Land Capability Districts 4, 5, 6, or 7, or on parcels with IPES scores above the line, and the excavation site is stabilized within 48 hours to prevent erosion. This exemption shall not be construed to exempt a series of excavations that viewed as a whole would constitute a project.</p>	<p>move to exempt with additional language to prevent change in natural contours and work in low land capabilities.</p> <p><i>Arlo comment: I agree with increasing the exempt threshold to 10 yards, and possibly more with design criteria. Existing language should be simplified to be allowed on "Non-Sensitive Land".</i></p> <p><i>New criteria should focus on changes impacting drainage patterns, while allowing minor changes in natural contours (including small retaining walls).</i></p>
<p><b>Demolition of Structures, Improvements, or Facilities 50 Years or Greater</b>  Demolition of structures, improvements, or facilities 50 years or greater in age, provided the structure, improvement, or facility is not designated, or pending for designation, on the Historic Resource Map. Any maintenance or repair that qualifies under this provision shall be consistent with the requirements in Ch. 67: Historic Resource Protection. Prior TRPA approval is required to obtain credit for coverage or existing development.</p>	<p>Leave as QE</p>
<p><b>Changes in Operation</b>  Changes in operation resulting in generation of less than 100 additional vehicle trips, in connection with a commercial, recreation or public service use, provided there is no change from one major use classification to another, the resulting use is an allowed use, and the applicant pays an air quality mitigation fee in accordance with subparagraph 65.2.4.D.</p>	<p>move to exempt</p> <p><i>Arlo comment: This should remain QE so TRPA can continue to collect air quality mitigation fees.</i></p>
<p><b>Seasonal Outdoor Retail Sales Use</b>  An outdoor retail sales use associated with a holiday season such as Christmas tree and pumpkin patch sales, provided the use shall not cause parking on unpaved areas, does not operate for more than six consecutive weeks in a 12-month period, and is located in a plan area designated commercial, public service, or tourist.</p>	<p>move to exempt</p>

Existing Qualified Exempt Activities	Recommendation
<p><b>Section 82.5 QE Activities in the Shorezone</b> [all]</p>	<p><i>Arlo comment: No changes are recommended for QE Activities in the Shorezone</i></p>
<p><b>Timber Harvesting</b> Timber harvesting for (1) the removal of dead, dying, and diseased trees (salvage cuts) less than or equal to 30 inches dbh in westside forest types and less than or equal to 24 inches dbh in eastside forest types, and (2) on parcels of 20 acres or less in size that are not part of a larger parcel of land in the same ownership provided that:</p> <ul style="list-style-type: none"> <li>a. A Tahoe Basin Tree Removal Permit that expires twelve months after issuance has been issued for trees marked pursuant to the memorandum of understanding between the appropriate state forestry agency and TRPA;</li> <li>b. Dying trees are defined as those determined to be dead within one year by a qualified forester authorized to issue a Tahoe Basin Tree Removal Permit by the Memoranda of Understanding between TRPA and the Nevada Division of Forestry;</li> <li>c. A pre-operations field inspection shall be completed by TRPA that is attended by a representative from the appropriate state forestry agency, property owner or authorized representative, and the licensed timber operator. TRPA shall notify the local representative from the appropriate state forest agency no less than five business days prior to the pre-operation field inspection to choose to attend the pre-operation field inspection;</li> <li>d. Grading shall not be in excess of seven cubic yards for activities occurring between May 1 and October 15, or not in excess of three cubic yards for activities occurring between October 15 and May 1, and is limited to land capability districts 3, 4, 5, 6, and 7;</li> <li>e. All slash shall be treated by chipping, piling for burning, or hauled away within 15 days following cutting, and any burning of piled slash shall be completed within 30 days during permissible burn periods or no later than May 1 of the following year;</li> <li>f. Soil erosion protection and stabilization of disturbed areas shall be done concurrently with logging operations, with full completion no later than 48 hours following the end of cutting; and</li> <li>g. There shall be no watercourse or stream environment zone crossings except for existing bridges and culverts.</li> </ul>	<p>Leave as QE</p>

Existing Qualified Exempt Activities	Recommendation
<p><b>Replacement of Existing Roof with Metal Roof</b>  Replacement of an existing roof with a metal roof that is composed of non-glare earthtone colors. For this subparagraph, non-glare earthtone colors are defined as Munsell Colors set forth in Appendix G, TRPA Approved Earthtone Colors, of the Design Review Guidelines that have a value and chroma of 0-4 or other color systems that are equivalent to the adopted hues, values, and chromas of Appendix G. The applicant shall submit color and material samples to TRPA with their qualified exempt form.</p>	<p>Leave as QE</p>
<p><b>Shorezone Activities</b></p>	
<p>Minor structural repair as defined in subsection 82.3.3 and painting, staining, reroofing, residing and the installation or replacement of deck coverings, provided such activities conform to the design standards set forth in Section 83.11 and do not result in a change in use or an increase in the dimensions of the structure, including height, width, and length.</p> <p>CHAPTER 2: APPLICABILITY OF THE CODE OF ORDINANCES  2.4 Previously Approved Projects, Uses, and Activities  2.3.8 Loss of Exemption  TRPA Code of Ordinances  Adopted by Governing Board December 12, 2012   Amended January 28, 2015   Page 2-18</p>	<p>Leave as QE</p>
<p>Repair of fences, provided the fence complies with the applicable development standards in subsection 84.12.2 and the design standards in subsections 83.11.1 and 83.11.3.</p>	<p>move to exempt</p> <p><i>Arlo comment: Recommend leaving all shorezone QE's unchanged.</i></p>
<p>The replacement and repair of the anchoring device for a mooring buoy provided TRPA has issued a permit for such mooring buoy pursuant to subsection 82.4.7.</p>	<p>Leave as QE</p>
<p>Demolition of structures, improvements, or facilities in accordance with subparagraph 2.3.7.A.7.</p>	<p>Leave as QE</p>
<p>Construction, reconstruction, repair, and modification of piers, floating docks and platforms and shoreline protective structures in lagoons pursuant to memorandums of understanding as provided for in Section 84.11.</p>	<p>Leave as QE</p>
<p>Changes in operation resulting in the generation of less than 100 additional vehicle trips are exempt provided the resulting use is an allowed use and the applicant pays an air quality fee in accordance with the Rules of Procedure.</p>	<p>Leave as QE</p>

Existing Qualified Exempt Activities	Recommendation
<b>Sign Activities</b>	
<p><b>Subdivision Identification Signs</b>            Installation or replacement of subdivision identification names or letters, provided the name or lettering shall be installed on an existing wall or similar structure, shall be not over 12 inches high, and shall not internally illuminated; and</p>	move to exempt
<p><b>Replacement of Approved Sign Faces</b>            Replacement of sign faces on signs approved by TRPA pursuant to Chapter 38: Signs, provided the new sign face remains in compliance with Chapter 38.</p>	move to exempt

**Attachment B**

**Preliminary Table of Code Reference Documents**

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
<u>General Document References</u>		
Sec 1.4 & Other	Tahoe Regional Planning Compact	Section 1.4 identifies the basic Land Use Documents Supporting the Code of Ordinances.  Other TRPA plans and programs that are required for application reviews are referenced individually below.
	The environmental threshold carrying capacities adopted in Resolution 82-11	
	The Goals and Policies Plan	
	Other TRPA plans and programs	
Sec 1.5	Lake Tahoe Water Quality Management Plan (aka “208 Plan”)	Portions of the Code inconsistent with the existing Lake Tahoe Water Quality Management Plan (“208 Plan” or “WQMP”) shall not be implemented until the necessary amendments to the 208 Plan are certified by the States of California and Nevada and the Environmental Protection Agency.
Sec 1.7	Administrative Fees	Fee schedule for numerous applications
Sec 2.2 & other	Rules of Procedure	Outlines basic procedures for project reviews and other matters.
Sec 2.3.2.E & other	Regional Plan Maps	For applicability of numerous ordinances
Sec 2.5 & other	Intergovernmental Memoranda of Understanding	For numerous agreements and replacement standards.
Sec 3.3.1	Initial Environmental Checklist (IEC)	For determination of need for an EIS
Sec 10.3.1	Plan Area GIS Layers	Numerous GIS layers are also referenced individually below.
Sec 15.3	Environmental Improvement Program	Threshold improvement projects applicable to all projects and activities in the region.
Sec 16.9	Environmental Threshold Evaluation Reports	Periodic reports on environmental thresholds and the status of progress on attaining standards, and related measures. Applies to project review findings.

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
<u>Development Rights Tracking Information</u>		
Sec 6.4 & Chaps 30, 50-53, etc	Parcel account files	Parcel files identifying the property data and regulatory information listed in Sections 6.5 through 6.7. Includes basic parcel information, coverage information, and unit of use information. Used to track the status of development allowances and limitations.
Sec 6.8, chaps 50-53	Regional Allocation annual reports	Reports issued each year on the status of development allocations in each local jurisdiction and plan area.
Sec 6.9, chaps 50-53	Regional Development Right Accounting	Reports issued every other year on the status of development rights in each local jurisdiction and plan area
Sec 6.10 Sec 30.4.3	Designated Land Banks	Groups responsible for land acquisition and land restoration. May have banked land coverage available for purchase.
Sec 6.11, chaps 50-53	Cumulative Accounting	A current cumulative account for all projects approved in accordance with subsection 16.8.2.
<u>Planning Area Reference Documents</u>		
Sec 11.3 & others	Plan Area Statements (all)	Documents providing detailed plans and standards for specific areas
Sec 12.3 & others	Community Plans (all)	Documents providing detailed plans and standards for specific areas
Sec 13.2 & others	Area Plans (all)	Documents providing detailed plans and standards for specific areas
Sec 13.6.5.B	load reduction plans for registered catchments	For area plan conformance reviews
Sec 13.7.1	Area Plan MOUs	Describes delegations of project reviews and other procedures for each Area Plan.
Sec 14.3	Specific and Master Plans	Documents providing detailed plans and standards for specific areas.
<u>Land Coverage Document References</u>		

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
Sec 30.3.2 & others	Bailey report Land Capability Districts	Land capability districts used to determine standards for land coverage and other topics. Class 1b is also known as Stream Environment Zone (SEZ).
Sec 2.3.2.E & other	SEZ Areas	For applicability of numerous ordinances
Sec 30.3.3	Land Capability Verifications	Field verifications of land capability. Required for permits on "Bailey parcels".
Sec 30.4.1.B1	TRPA-Approved Subdivisions in Conformance with the Bailey Coefficients	Subdivisions with allowable coverage for the subdivision assigned to individual parcels.
Sec 30.4.1.B2	Existing Planned Unit Developments (PUDs) Not in Conformance with the Bailey Coefficients	Subdivisions subject to certain development standards
30.4.3	Hydrologically Related Areas	Boundaries for applicability of certain land coverage transfer limitations and mitigation fee calculations.
30.4.6.D3	Federal jurisdictional wetlands as mapped by the Army Corps of Engineers	Used for public trail design standards
30.4.6.D3	Lake Tahoe Region Bike Trail and Pedestrian Plan	Used for public trail design standards and air quality standards
<u>Design Standard Reference Documents</u>		
36.3 36.6	Design Review Guidelines	1989 document outlining the general design standards and guidelines for development. Includes Appendix G for colors and Appendix H for shoreland scenic assessments.
33.4.1 & chap 67	TRPA Historic Resource Map	Used for determining requirements for subsurface investigations prior to grading.
34.2 & 36.2.2 & 38.2.3	Douglas County Community Plans, Design Standards and Guidelines, August 1993	Substitute standards for driveways and parking (chap 34), design standards (chap 36), and signs (chap 38) in the Round Hill Community Plan

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
34.2 & 36.2.2 & 38.2.3	Tahoe Area Plan Regulations (Chapter 20.703) of the Douglas County Development Code	Substitute standards for driveways and parking (chap 34), and signs (chap 38) in the South Shore Area Plan
34.2 & 36.2.2 & 38.2.3	South Shore Design Standards and Guidelines (September 2013 and as amended)	Substitute standards for driveways and parking (chap 34) and design standards (chap 36), and signs (chap 38) in the South Shore Area Plan
38.2.3	Section L of Chapter 12: Signs of the Douglas County Community Plans, Design Standards and Guidelines (August 1993)	Substitute standards (interim) for signs (chap 38) in the South Shore Area Plan
34.2 & 36.2.2 & 38.2.3	Placer County Tahoe Basin Area Plan, Implementing Regulations	Substitute standards for driveways and parking (chap 34), design standards (chap 36), and signs (chap 38) in Placer County
34.2	City-Wide Design Standards found in Chapter 6.10 and 6.55 of the City of South Lake Tahoe Municipal Code	Substitute standards for driveways and parking (chap 34) in portions of South Lake Tahoe outside of Area Plans
36.2.2 & 38.2.3	City of South Lake Tahoe Standards and Guidelines for Design, Signage, Parking, Driveway, and Loading Spaces, June 1994	Substitute standards for design standards (chap 36), and signs (chap 38) in portions of South Lake Tahoe outside of Area Plans
34.2 & 36.2.2 & 38.2.3	Tourist Core Area Plan Development and Design Standards (Appendix C)	Substitute standards for driveways and parking (chap 34), design standards (chap 36), and signs (chap 38) in the Area Plan
34.2 & 36.2.2 & 38.2.3	Tahoe Valley Area Plan Development and Design Standards (Appendix C)	Substitute standards for driveways and parking (chap 34), design standards (chap 36), and signs (chap 38) in the Area Plan
34.2 & 36.2.2	[Washoe County] Tahoe Area Plan Design Standards and Guidelines, May 2021	Substitute standards for driveways and parking (chap 34) and design standards (chap 36) , and signs (chap 38) in the Crystal Bay Tourist, Incline Village Commercial, Incline Village Tourist, and Ponderosa Ranch districts.

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
34.2 & 36.3	Meyers Area Plan Design Standards and Guidelines, February 2017.	Substitute standards for driveways and parking in the Meyers Area Plan.
35.4	100-year floodplains as mapped by the Army Corps of Engineers	Used for determining the applicability of certain development prohibitions.
36.5.5	Maintenance Responsibilities Chart and Plan Template	TRPA provided template must be completed with permits for projects with active transportation facilities.
37.5.9	Resolution 2008-11	Designates Special Projects for additional height allowances in ski area master plans.
37.7	Various community plans are referenced for special height findings. Most have been repealed and replaced with Area Plans.	These are used determine compliance with special height findings. Sections should be deleted if these are no longer needed within the Area Plans.
38.2.3	Lake Tahoe Recreation Sign Guidelines (as amended January 2001).	Recreation sign guidelines for the entire Lake Tahoe Region
38.2.3	Meyers Area Plan substitute sign standards (February 2018)	Substitute standards for driveways signs (chap 38) in the Area Plan
38.5.1	Forest Service Catalog of Posters and Signs, EM-7100-15, 1992, as amended	Standards for signs on national forest lands
38.5.2	State of California as set forth in the Department of Parks and Recreation Sign Handbook, 1973, as amended.	Standards for signs on California State Park lands
38.5.2	State of Nevada Department of Parks and Recreation Sign Handbook, 1973, as amended	Standards for signs on Nevada State Park lands
39.2.5	Urban areas existing on December 31, 1994, or as amended pursuant to subsection 11.8.4	Used to determine applicability of certain subdivision standards.

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
<u>Resource Protection Reference Documents</u>		
Sec 2.3.2.H Chap 60 & 61, etc	Handbook of Best Management Practices (BMP Handbook)	Outlines improvements to implement standards for water quality, vegetation, etc
60.3	TRPA Source Water Assessment maps	Identifies source water protection zones for applicability of additional pollution control ordinances.
2.3.2H & 36.7 & chap 61	TRPA Recommended Native and Adapted Plant List	Plant species on the list shall be used for lawns and landscaping, with exceptions. Sec 2.3.2H refers to this as the "TRPA Plant List"
Sec 2.3.2.E & chap 61	Eastside forest types Westside forest types	For applicability of different tree protection standards (30 inches vs 24)
61.3.6 & 62.4	TRPA Special Species map layers.	Depicts sensitive plant habitat and uncommon plant communities for applicability of additional ordinances.  Also depicts habitat locations for special interest species including goshawk, osprey, bald eagle, golden eagle, peregrine, water fowl, and deer for additional ordinance applicability.
10.3.1.D & 63.3.2	Stream Habitat Quality GIS Layer	For applicability of certain fish resource ordinances
65.1.4	TRPA list of gas heaters that are in compliance with the air quality standards in subparagraph 65.1.4.A.1	Used to determine compliance with air quality standards
65.2.4	TRPA mobility mitigation fee zones for each land use type and for all areas in the region.	Used to calculate mobility mitigation fees for certain applications.
65.2.4	TRPA mobility mitigation fee schedule	Used to calculate mobility mitigation fees for certain applications.
<u>Scenic Protection Reference Documents</u>		
66.1.3	Study Report for the Establishment of	Used to determine compliance with scenic standards

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
	Environmental Threshold Carrying Capacities, October 1982.	
66.1.3 & others	1982 Lake Tahoe Basin Scenic Resource Inventory	Used to determine compliance with scenic standards and other ordinances.
66.1.4	A Scenic Analysis of Principle Travel Routes In The Lake Tahoe Region, 1970	Additional report used to explain criteria for rating travel routes.
66.1.5, 2.3.2.B, 36.6	1993 Lake Tahoe Basin Scenic Resource Evaluation	Reference document for Scenic Threshold Travel Routes and Public Recreation Areas and Bicycle Trails.
66.2.2, 10.3.1.F	Scenic Units GIS Layers	For applicability of certain scenic and shorezone ordinances
66.2.3	Scenic Viewpoint Corridor Plan	Identifies scenic improvements and implementation measures
36.4	Scenic Quality Improvement Program	Additional design guidelines applicable to specific areas.
<u>Shorezone Reference Documents</u>		
10.3.1.C & 80.4.4	Prime Fish Habitat GIS Layer	For applicability of certain shorezone ordinances
80.4.6	Mapped historical Washoe Indian resource sites	For applicability of additional standards
80.4.8	GIS data for sensitive or uncommon plants	For applicability of additional standards
80.4.8	Tahoe Yellow Cress Conservation Strategy.	Reference document for protection and mitigation measures
83.5	Shorezone Tolerance Districts	For applicability of district-specific standards
84.2.1	Development standards MOU for the Tahoe Keys lagoon area	Substitute shorezone standards
84.3.2	Existing moorings	For applicability of mooring conversion standards

<i>Preliminary Table of Code Reference Documents</i>		
<i>Code Section</i>	<i>Reference Document</i>	<i>Description</i>
84.3.2 & 84.4.4	Accounting of additional mooring and pier allocations	Required for new moorings or piers
10.3.1.G & 84.4.2	Shorezone Preservation Areas	For applicability of certain shorezone ordinances
10.3.1.H & 84.4.3	Stream Mouth Protection Zones	For applicability of certain shorezone ordinances
10.3.1.E & 84.4.3	Pierhead Line GIS Layer	For applicability of certain shorezone ordinances
<u>Miscellaneous Reference Documents</u>		
Sec 2.3.3.O	Manual on Uniform Traffic Control Devices, 1978, as amended.	For applicability of street sign exemptions
Sec 2.3.4.A	TRPA-approved area wide mail delivery program	For mail receptacle standards
Sec 2.3.4.B	U.S. Postal Service standards	For mail receptacle standards

[end]