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Sent: 9/26/2023 11:11:10 AM
To: Public Comment <PublicComment@trpa.gov>; Karen Fink <kfink@trpa.gov>; Alyssa Bettinger <abettinger@trpa.gov>; Jessica Diss <jdiss.trpa@gmail.com>; Shelly Aldean <shellyaldean@gmail.com>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Vince Hoenigman <vhoenigman@yahoo.com>; Alexis Hill <AHill@washoecounty.us>; James Settlemeyer <JSettlemeyer@dcnr.nv.gov>
Subject: Public Comment TRPA RPIC Meeting 9-27-23 - Agenda Item 3
Attachments: [TahoeCleanAir.org Comment RPIC Mtng 9-27-23.pdf](#)

Dear RPIC Members:

Please include this written public comment as part of the minutes and the record in connection with the 9-27-23 TRPA RPIC Meeting Agenda Item 3:

Informational Update and possible direction to staff on the Phase 2 Housing Amendments, including proposed changes to Code of Ordinances Chapter 13, Area Plans; Chapter 36, Design Standards; Chapter 37, Height; Chapter 31, Density; Chapter 30, Land Coverage; Chapter 34, Parking Policies; Chapter 52, Bonus Unit Incentive Program and Chapter 90, Definitions; and changes to the Goals and Policies, Land Use and Housing Sections; that would only apply to projects applying for deed-restricted bonus units (possible direction/action to staff).

Sincerely,
Doug Flaherty, President
Tahoe Sierra Clean Air Coalition (DBA TahoeCleanAir.org)
A Nevada 501(c)(3) Non-Profit Corporation
774 Mays Blvd 10-124
Incline Village, NV 89451

TahoeCleanAir.org Organizational Purpose

Tahoe Sierra Clean Air Coalition (DBA TahoeCleanAir.Org) is a Nevada 501 (c) (3) non-profit corporation registered to do business in the State of California. Our organizational purpose extends beyond protecting clean air, and includes, among other purposes, protecting and preserving natural resources, including but not limited to clean air, clean water, including lake and stream clarity, soils, plants and vegetation, wildlife and wildlife habitat including wildlife corridors, fish and fish habitat, birds and bird migration, insects, forest and wilderness from adverse environmental impacts and the threat and potential of adverse environmental impacts, including cumulative adverse impacts, within the Nevada and California Sierra Range, and its foothill communities, with corporation/organization geographical purpose priority being that of the Lake Tahoe Basin. Our purpose further extends to all things incidental to supporting environmental impact assessments and studies, including the gathering of data necessary to analyze the cumulative adverse environmental, health and safety impacts from public and private projects inside and outside the Lake Tahoe Basin, and addressing and supporting safe and effective evacuation during wildfire. Our purpose further extends to supporting transparency in government to ensure that our purpose and all things incidental to our specific and primary purposes are achieved.



9/26/23

RE: Public Comment TRPA Regional Plan Implementation Committee (RPIC) Meeting 9-17-23 – Agenda Item 3

Dear RPIC Members:

Please include this written public comment as part of the minutes and the record in connection with the 9-27-23 TRPA RPIC Meeting Agenda Item 3:

Informational Update and possible direction to staff on the Phase 2 Housing Amendments, including proposed changes to Code of Ordinances Chapter 13, Area Plans; Chapter 36, Design Standards; Chapter 37, Height; Chapter 31, Density; Chapter 30, Land Coverage. Chapter 34, Parking Policies; Chapter 52, Bonus Unit Incentive Program and Chapter 90, Definitions; and changes to the Goals and Policies, Land Use and Housing Sections; that would only apply to projects applying for deed-restricted bonus units (possible direction/action to staff).

In connection with Article VII(a)(2) of the Compact, the proposed code amendments **represent a land use planning matter that** may have a significant and cumulative effect on the environment. Therefore, and for the reasons listed below, per the Bi-State Compact, TRPA regulations and the California Environmental Quality Act (CEQA), TRPA must prepare and consider a detailed environmental impact statement (EIS) before deciding to approve the proposed amendments.

Any reasonable person would conclude that these far-reaching proposed amendments may have a significant effect on the environment and public safety, especially within dense town centers and multi-use areas. This, based on a cumulatively significant numbers of amendments, past projects, new information, recent safety and pollution events, and continuing degradation of Lake Tahoe, since the 2012 Regional plan adoption.

This, in connection with only a few examples that have been identified since the TRPA 2012 Regional Plan EIS/EIR including:

- Significant new and important life safety planning information contained in the CEQA 2020 California Attorney General Guidance document “Best Practices for Analyzing and Mitigating Wildfire impacts of Development Projects”.
- Significant individual but cumulatively impactful Regional Plan code amendments including significant Short-Term Rental and ADU code change approvals.
<https://www.trpa.gov/regional-plan/code-amendments/>
- Significantly cumulative adverse environmental impacts, including, but not limited to the Caldor fire and so called snowmageddon evacuation debacles, record micro plastics within the lake, dramatic increases in algae, deposits of herbicides, alarming increases in aquatic invasive species, huge trash deposits on beaches and significant underwater trash litter, dramatic unsafe overpopulation increases in an already unsafe overpopulation. This cumulatively unsafe population increase is encouraged by TRPA supported and approved cumulative destination attraction projects like the East Shore trail and destination hotels and resorts without adequate human and roadway cumulative impact capacity analysis.

Per the TRPA Code of Ordinances, Rules of Procedure and the California Environmental Quality Act (CEQA), a new EIS or a supplemental EIS/EIR to the 2012 Regional Plan must be prepared, circulated, and certified. This since the proposed amendments to increase height, density, coverage, reduce parking and setbacks and significantly increase the proliferation of tiny homes and ADU's are:

- Geographically significant in scope within the Lake Tahoe Basin, potentially adversely affecting the environment and public safety along the North, South, East and West Shores, including dense and concentrated Town centers.

- Agenda driven, subjective, and fail to provide substantial evidence that the cumulative impact of the proposed amendments, especially within Town centers and multi-use areas will result in workforce housing. Claims by TRPA in this regard have been based on flawed and incomplete data. TRPA has failed to provide substantial evidence that the stated outcomes will be achieved and therefore the stated outcomes are highly unlikely and controversial. Current evidence runs counter to TRPA stated outcomes.

A new or supplemental EIS to the 2012 Regional Plan must be prepared, circulated, and certified in accordance with these Rules in the same manner as a draft EIS. TRPA must require preparation, circulation, and certification of a supplemental EIS since:

A. The proposed amendments represent subsequent amendments that involve new significant adverse effects not considered in the 2012 EIS.

B. Substantial environmental and safety changes within Lake Tahoe's unique environment have occurred within the last 11 years with respect to demonstrated basin environmental degradation, decreased safety in an already unsafe human and roadway overcapacity environment and involve new significant adverse effects not cumulatively considered in the prior EIS.

TRPA Code of Ordinances Section 3.3. DETERMINATION OF NEED TO PREPARE ENVIRONMENTAL IMPACT STATEMENT states:

Except for planning matters, ordinary administrative and operational functions of TRPA, or exempt classes of projects, TRPA shall use either an initial environmental checklist or environmental assessment to determine whether an environmental impact statement shall be prepared for a project or other matter.

The proposed far-reaching amendments represent a significant land use planning matter, are not ordinary administrative and operational functions of the TRPA and are not an exempt class. Therefore, an Initial Environmental Checklist (IEC) nor an Environmental Assessment (EA) should not be used to avoid the requirement to require an EIS/EIR.

Any reasonable person would conclude that there is a reasonable possibility that the far-reaching proposed amendments will have a significant effect on the environment and public safety based on the cumulatively significant numbers of amendments, past projects, new information and continuing degradation of Lake Tahoe, since the 2012 Regional plan adoption.

The proposed amendments are not exempt from preparation of an EIS under the TRPA Code of Ordinances list of classes of projects that will not have a significant effect on the environment and are not exempt from requiring an EIR under CEQA.

Threat to Life Safety in Concentrated Town Centers and Mixed-Use Areas

Adoption of the amendments, without first applying the most up to date best practice wildfire planning tools will most likely result in increased wildfire evacuation impacts throughout basin and most predominantly in "denser" more concentrated town centers and mixed-use areas.

This, due to cumulatively proposed concentrated increases in building density, coverage, and planned eventual building height, as well as reduced parking and setbacks and increased proliferation of tiny homes and ADU's. This then, resulting in increases in concentrated human population (residents and visitors, including tourists), within town centers and mixed-use areas, functioning within an already unsafe overcapacity roadway and often LOS F intersection environment.

While there exists an opinion that more concentrated development within town centers vs development outside of town centers may prevent ignitions, the reality is that all business and residential population areas within the basin, including dense concentrated town centers and mixed-use areas exist within the Nevada and California "Wildland Urban Interface", and specifically on the California side, per the California State Fire Marshal, most of the built environment geographical area is classified as a Very High Fire Hazard Severity Zones (VHFHSZ).

<https://osfm.fire.ca.gov/divisions/community-wildfire-preparedness-and-mitigation/wildfire-preparedness/fire-hazard-severity-zones/>

Therefore, any ignitions, inside or outside the planning area, especially within our wind and slope environment may become out of control. This significantly impacts wildfire evacuation and emergency access. Therefore, as a life safety priority as well as for reasonable and prudent planning, the TRPA must require the most up to date and best life safety wildfire evacuation planning tool be utilized before the proposed amendments are heard and adopted.

Resident and visitor populations (including tourists) within each of the town centers and mixed-use areas individually and cumulatively represent significant concentrated populations.

Increased concentrations within town center and mixed-use areas will, most likely serve as wildfire evacuation “**choke points**.” This as increased and concentrated town center and mixed-use population vehicles and foot traffic compete in a “**sudden surge**,” impacting already over capacity evacuation roadways, thereby further and significantly impacting the current evacuation assumptions and timing.

Body Cam Footage – Evacuation from Paradise

<https://abc7news.com/camp-fire-video-bodycam-of-evacuations/4850913/>

A new and revised EIS must include the following significant new and best available, best practice evacuation guidance information (not known to the TRPA at the time of the 2012 Regional Plan adoption but known now). This new information is contained in the 2020 California Attorney General Guidance, under CEQA, “Best Practices for Analyzing and Mitigating Wildfire impacts of Development Projects” of which can serve to assist planning staff, emergency services and the public to determine the safety impacts as a result of the currently proposed amendments, in connection with wildfire evacuation and emergency access.

<https://oag.ca.gov/system/files/attachments/press-docs/Wildfire%20guidance%20final%20%283%29.pdf>

In the interest of prudent life safety wildfire evacuation planning, the TRPA must utilize the best available California Attorney General Best Practices for Analyzing and Mitigating Wildfire impacts of Development Projects when it comes to evacuation planning. This includes the prudent development of a variety of concentrated town center and mixed-use planning scenarios to help inform planners, the public and emergency responders regarding potential options during a wildfire evacuation including identification of significant impacts the amendments will have on wildfire evacuation.

The Best Practices guidance document “was based on the California Attorney General’s experience reviewing, commenting on, and litigating CEQA documents for projects in high wildfire prone areas,” and contains among other critical SAFETY guidelines the following, of which the EIR Addendum failed to include in its determinations.

Given the fact that no similar life safety best practice tool of its kind exists in the region, in order to ensure adequate life safety of residents and visitors alike are given a top priority, TRPA must require that the significantly relevant 2020 Calif Atty General Life Safety Best Practices, be adopted and applied before the proposed amendments are adopted, including the following elements:

- Development in fire-prone areas increases the likelihood that more destructive fires will ignite, fire-fighting resources will be taxed, more habitat and people will be put in harm’s way or displaced, and more structures will burn.
- This guidance provides suggestions for how best to comply with CEQA when analyzing and mitigating a proposed project’s impacts on wildfire ignition risk, emergency access, and evacuation.
- Put simply, bringing more people into or near flammable wildlands leads to more frequent, intense, destructive, costly, and dangerous wildfires.

The best practice guidance includes:

- a) Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access.
- b) Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency.
- c) Evaluation of the project’s impact on existing evacuation plans.

- d) Consideration of the adequacy of emergency access, including the project's proximity to existing fire services and the capacity of existing services.
- e) Traffic modeling to accurately quantify travel times under various likely scenarios.
- f) Consider impacts to existing evacuation plans, but recognize that, depending on the scope of an existing evacuation plan, additional analyses or project-specific plans may be needed. Community evacuation plans often identify roles and responsibilities for emergency personnel and evacuation routes, but do not necessarily consider the capacity of roadways, assess the timing for community evacuation, or identify alternative plans for evacuation depending upon the location and dynamics of the emergency.
- g) Local jurisdictions are encouraged to develop thresholds of significance for evacuation times. These thresholds should reflect any existing planning objectives for evacuation, as well as informed expert analysis of safe and reasonable evacuation times given the existing and proposed development.
- h) Local jurisdictions should consider whether any increase in evacuation times for the local community would have a significant impact. The conclusion that an increase in evacuation times is a less than significant impact should be based on a threshold of significance that reflects community-wide goals and standards. Avoid overreliance on community evacuation plans identifying shelter-in-place locations. Sheltering in place, particularly when considered at the community planning stage, can serve as a valuable contingency, but it should not be relied upon in lieu of analyzing and mitigating a project's evacuation impact.

Loss of life and injury to the public and visitors during wildfire evacuation may be substantially more severe than discussed in the 2012 Regional Plan EIS/EIR eleven years ago. This, since TRPA was not aware of this best practice life safety planning tool. However, now that TRPA is aware of this significant life safety planning tool, TRPA must conduct a best practice wildfire evacuation roadway capacity evaluation based on proposed cumulative increases of building height, coverage, density, reduced setbacks, and decreased parking and increased proliferation of tiny homes and ADU's.

Further, TRPA has failed to develop safety, roadway, and human overcapacity thresholds of significance, utilizing the latest data driven and best available technology, since 2012 to do so. Going forward with the proposed amendments without doing so is negligent.

Resident and visitor populations (including tourists) within each of the town centers and mixed-use areas individually and cumulatively represent significant concentrated populations.

Photos of Paradise Fire (Camp Fire) victims and location where each victim died.

<https://www.kcra.com/article/these-are-the-victims-of-camp-fire/32885128>

Caldor Fire Evacuation – Mercury News August 31, 2021

<https://www.mercurynews.com/2021/08/30/its-out-of-control-caldor-fire-prompts-south-lake-tahoe-evacuation-traffic-gridlock/>

On the California side, failure to provide a new or supplemental EIS associated with the proposed code amendments runs counter to CEQA, Chapter 1: Legislative Intent.

CEQA § 21000. LEGISLATIVE INTENT

The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and **SAFETY** of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached.

The proposed code amendments fail to discuss and identify critical turn by turn roadway by roadway wildfire capacity thresholds, utilizing the latest technology and worst-case wildfire scenarios. Such identification of these critical roadway capacity thresholds is necessary to assist TRPA during their environmental public safety review process as connected with code amendment adoption process.

The California Fire Code, all Tahoe Basin Fire Protection District Fire Codes, TRPA Code of Ordinances and Rules of Procedures, FEMA County Emergency Plans as well as Placer, Douglas, El Dorado, and Washoe Counties FAIL to identify the critical SAFETY threshold of human and roadway capacity during wildfire evacuation and FAIL to:

- Contain any regulations whatsoever requiring emergency evacuation plans to identify region wide turn by turn roadway by roadway wildfire evacuation capacity thresholds, based on worst case wildfire scenarios or otherwise.
- Contain any regulation whatsoever, to employ the best technology, developed since the 2017 EIR or otherwise, in order to determine turn by turn roadway by roadway wildfire evacuation capacity thresholds, based on worst case wildfire scenarios or otherwise.
- Provide substantial evidence based on best available technology modeling, to help determine the cumulative human capacity threshold wildland fire evacuation impacts on town centers caused by proposed TBAP increases in height, density, coverage increases safety peril during worst case wildfire evacuation or the extent that incoming emergency service vehicles will be impaired by such increases.
- Discuss the alternative of not adding the current increased height, density, coverage, reduced setbacks to Town centers due to wildfire evacuation constraints from increased human capacity.

Largely unknown to the public, fire jurisdictions commonly adopt the International Fire Code and the International Urban Wildfire Interface Code, which narrowly addresses building evacuation and wildland fire prevention, the codes do not address adequate requirements regarding wildfire evacuation within the Wildland Urban Interface.

In light of this fire code critical safety deficiency on part of the agencies to require safe and effective evacuation regulations, and latest evacuation capacity modeling, TRPA must rely on the October 2020 California AG Best Practices Wildfire Impact guidance document when discussing wildfire evacuation within basin boundaries.

Finally, the TRPA continues to claim that it is not their responsibility to create wildfire evacuation plans but to leave that up to the various government entities within the basin.

Regardless of whether or not this is the case, the TRPA has the responsibility to, and must create and adopt basin wide cumulative environmental and safety impact EIS/EIR's which include, in the case of the proposed amendments, a requirement to apply the most up to date wildfire evacuation planning life safety tool. i.e., the Best Practices for Analyzing and Mitigating Wildfire impacts of Development Projects", within a new or supplemental EIS, since the 2012 Regional Plan.

Sincerely,

Doug Flaherty, President

Tahoe Sierra Clean Air Coalition (DBA TahoeCleanAir.org)

A Nevada 501(c)(3) Non-Profit Corporation Registered to do business in the State of

California 774 Mays Blvd 10-124

Incline Village, NV 89451

From: Pamela Tsigdinos <ptsigdinos@yahoo.com>
Sent: 9/26/2023 2:10:00 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: Marja Ambler <mambler@trpa.gov>;
Subject: TRPA Governing Board 9-27-23 Public Comment for RPIC and Governing Board - Agenda Item 3
Attachments: [Tsigdinos.PublicComment9.27.23.pdf](#) , [Nevada Independent.Tahoe.9.4.2023-1.pdf](#)

Please include the attached public comment (see PDFs) in the public record and provide to the TRPA Regional Plan Implementation Committee and Governing Board members and appropriate staff. Thank you, Pamela Tsigdinos

September 26, 2023

TRPA RPIC Members, Governing Board and Staff,

I am not in favor of the far-reaching set of amendments proposed to the TRPA Regional Plan Implementation Committee for discussion September 27, 2023.

What I am in favor of is enhancing Tahoe communities through continued **re-development within the existing framework**. Instead of adopting ill-conceived, far-reaching new amendments and a misguided plan to add more height and density, I strongly urge you to:

- convert existing structures from empty commercial spaces to housing instead of only focusing on building new units;
- invest in programs that **incentivize** repurposing of abandoned buildings that have the infrastructure and parking in place;
- severely cap STRs throughout the Tahoe Basin to free up long term rentals as well as increase fines and enforcement measures to ensure compliance;
- Re-examine rules for McMansions and luxury condos. These uses create a workforce and thus should mitigate the jobs they create;
- Encourage and fund programs such as lease to locals;
- Consider imposing vacancy taxes.

Tahoe does not need more buildings and more congestion. The proposed amendments make no sense whatsoever for the geographically constrained and overburdened Tahoe Basin. Where are the rules that mandate large employers provide housing for their employees and, again, incentives to allow redevelopment of blighted structures?

As for the environment and public safety. Any reasonable person would conclude that the drastic proposed amendments tied to TRPA's housing plan will have negative significant impacts, especially within dense town centers and multi-use areas.

While presented as necessary to encourage affordable and workforce housing, these amendments will do nothing of the sort. They are instead gifts to the developers who helped craft them.

What TRPA's proposed amendments and housing plan has and will continue to do is a unify public sentiment against it. No visitor, worker or resident supports manufactured gridlock or threats to public safety.

After Lahaina's tragedy, it's downright chilling that TRPA persists with a single-minded focus to pack *more* buildings and more people into already visitor-overwhelmed town centers.

This developer-friendly set of amendments also sets the table for an updated version of the 1911 Triangle Shirtwaist fire tragedy – creating unsafe conditions where no one can escape. I say this with no hyperbole.

I attended Washoe County's evacuation exercise -- the one calling for a small group of Incline residents to go to the rec center. Rather than instill confidence, this exercise filled me with dread as it simulated nothing resembling real life.

An emergency trained volunteer told me if a fire breaks out nearby, we're all in deep doo-doo (he used a cruder term). This is **before** more buildings are constructed. I was also at the King's Beach wildfire town hall hosted by Placer County Supervisor and TRPA Chair Gustafson.

Kings Beach and west is where our community and visitors would head if a fire came from the east. These amendments for increased building density would create a far worse choke point than exists today – and it's currently awful.

Your July governing board meeting has Ms. Aldean and COO Hester on record acknowledging if a fire starts within miles of the Lake no wildfire visitor alert system exists. Visitor mass exodus is the stuff of nightmares. Day tripper vehicles routinely block and narrow access on Hwy 28 – the heavily trafficked two-lane road to town centers TRPA wants to build up and out.



The difference between the tragedies in 1911 and in Paradise and Lahaina today is you have greater public safety knowledge and lessons at your fingertips. TRPA possesses authority to establish **responsible** land use rules that **protect** not endanger. It makes no sense to increase building density and population when experts and those of you making decisions today, admit Tahoe lacks reliable integrated systems to ensure the safety of those **already** here.

Last, but not least. To understand why public trust in TRPA has eroded so badly, start with your slides and website renderings of the dreamlike high-rise Tahoe you envision. Where are the 10- and 20-foot snowbanks we endured months on end this past year blocking bus stop access and multi-use paths?



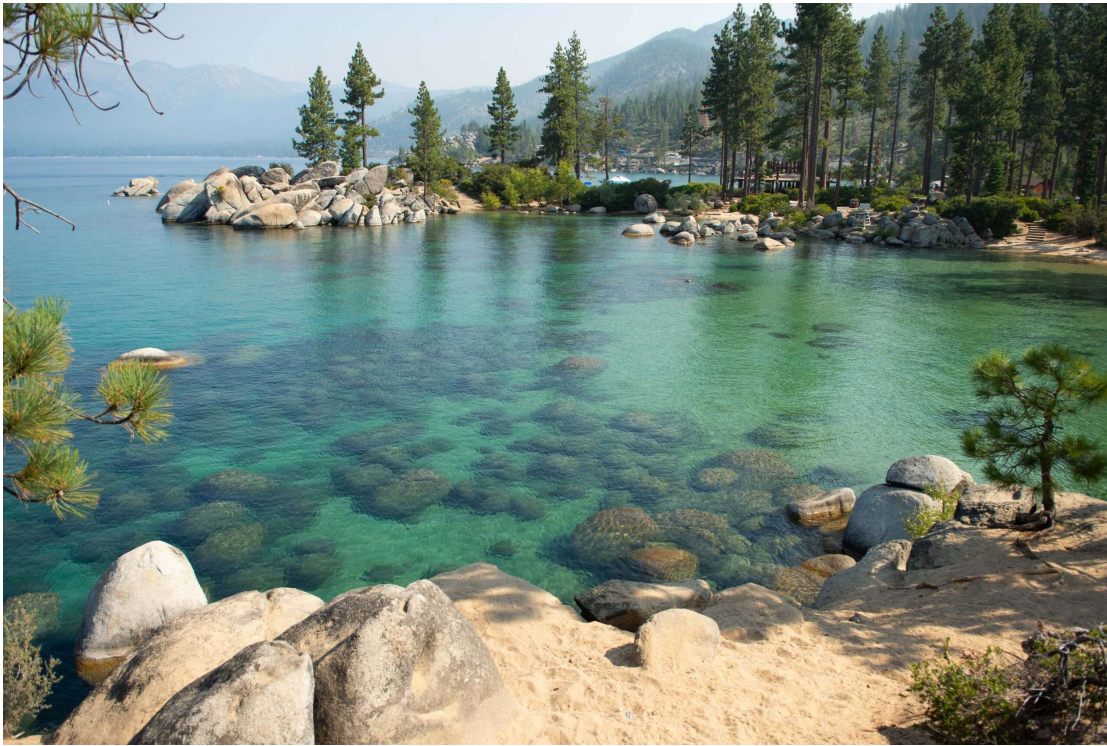
In short, Tahoe's public safety needs, infrastructure and environment cannot support this plan.

Respectfully submitted,

Pamela Tsigdinos

p.s. I am also sending in a separate PDF, an article I wrote for the *Nevada Independent*, **What VIPs Don't See: All is Not Well in Tahoe**, published September 4, 2023

What VIPs don't see: All is not well in Lake Tahoe



Sand Harbor state park at Lake Tahoe on Tuesday, Aug. 17, 2018. (David Calvert/The Nevada Independent).

From a Lake Tahoe resident's point of view, it has been surreal to see so many high-profile leaders visit in the span of weeks. To balance rosy reports from [agency leads](#) and their development-focused allies (some of whom [use nonprofit status](#) to [seek more](#) federal, state and local funding), I'd like to provide an insider's view of life on the ground.

The VIP access afforded to presidents mirrors what we saw in preparation for the recent 27th annual LakeTahoe Summit: illegal buoys vanish from the lake; overflowing trash disappears; and roads clear of construction and tourist gridlock that routinely grind traffic to a stop. If only Tahoe were like that every day.

Residents from rural Tahoe communities heard from a long list of summit speakers including Gov. Joe Lombardo and Speaker Emerita Nancy Pelosi. The theme? Sustainability and stewardship in the face of climate crisis. Apart from a starkly honest assessment from [Washoe Tribe leaders](#), there was a jarring disconnect between what officials had to say about protecting Tahoe and [plans in the works](#).

Local and state leaders are pushing new [urban planning](#) development proposals that will increase building density and allow once [unthinkable heights](#) to accommodate more people in a basin already straining under the weight of more tourists.

With an already congested two-lane ring road connecting small communities, what happens in the Tahoe Basin generally affects all of us — particularly when it comes to wildfires and extreme weather events. That's why many of Tahoe's 55,000 residents oppose plans for an urbanization platform,

particularly since it comes with no independent cumulative [environmental](#) or coordinated [human evacuation](#) plans required.

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THE DAILY INDY

Tahoe residents haven't forgotten the poorly executed [Caldor fire evacuation](#). Those affiliated with [Sierra Club Tahoe Area Group](#), North Lake Tahoe Preservation Alliance, Friends of the West Shore, Tahoe East Shore Alliance and Tahoe Neighborhoods Group are rightly alarmed about overdevelopment as climate change dangers increase. Retired fire battalion chief and Tahoe resident [Doug Flaherty](#) summed it up: No data-driven Tahoe wide, worst-case fire evacuation plan currently exists.

Lahaina burned during the summit, adding a tragic warning. There are many lessons from Maui for the public and public officials alike. Chief among them is how the lack of worst-case disaster planning scenarios can mean the difference between life and death. For example, [officials downplayed](#) and underestimated wildfires' deadly threat. Visitors further complicated evacuation in Maui's geographically restricted location.

I deeply empathize with Maui residents who bristle when media diminish their communities with words like "tourist spot" or "vacation destination" in describing what is, in fact, their home. These labels best serve developers, real estate agents and those who materially benefit from tourism revenue. However, they inevitably doom places of natural beauty, relegating them in the minds of the public to mere holiday or Disney-esque getaways.

Tahoe shares similarities with Maui. Both are uniquely beautiful locations with limited infrastructure bound by mountains and a large body of water. There are a mix of full-time occupants and second-home owners. Hotels, motels and inns fill commercial zones and too many short-term rentals afflict residential areas.

Tourists can grossly outnumber residents and population rates vary dramatically. Maui gets 3 [million visitors](#) a year; Tahoe gets up to [25 million](#). Both landed on [Fodor's "No List"](#) for places to visit in 2023 due to the stress and damage of overtourism.

Yet tourists present a new form of existential threat when they compete for precious access to two-lane evacuation routes. As Lahaina demonstrated, [sheltering in place](#) during a fast-moving fire proved tragically deadly. Those who survive require shelter, food, medicine and care. Unlike impacted residents, visitors have a safe home to return to.

I recognize that those of us who live in places that only exist on other people's bucket lists must share nature's best. In return, visitors must acknowledge they share a responsibility to be respectful and informed, to heed nature's fury and to not further over-tourism's destructive forces.

Meanwhile, with [life-threatening wildfires](#) and [extreme winter](#) weather demanding attention, Tahoe officials [continue to make decisions](#) that benefit investors and real estate interests serving the [tourism industry](#). Officials cheer about getting "heads in beds," yet are loath to admit there is no comprehensive plan for evacuating everyone safely if a wildfire barrels into the basin. Evacuation plans where I live in Tahoe [currently do not](#) include nonresidents.

I logged into a San Francisco Bay Area best practices disaster planning webinar and asked how they factor in vacationers. Stumped, the expert admitted they hadn't considered tourists. Following persistent resident pleas Nevada and [California](#) are now "building relationships" toward a unified, cross-jurisdictional command structure but confidence remains low on how disparate agencies with differing software and communication modes will function under duress. Experts who analyzed the Camp Fire in Paradise, California, established the fire [grew a football field a second](#). Other reports examined the risks associated with [sheltering in place](#).

While you might think Tahoe is protected by the bistate Tahoe Regional Planning Agency (TRPA), that is [not the case today](#). It has fallen victim to [regulatory capture](#). TRPA now openly embraces [development](#). It claims to champion affordable housing, yet its latest approvals went to a developer of [\\$2.5 million-plus luxury condominiums](#) and [an investor group](#) looking to create a Waldorf Astoria-branded hotel.

With this pro-development backdrop, ski industry executives want to monetize [operations year-round](#). One Olympic Valley proposal acknowledges evacuees would face an [11-hour wait](#) to drive 3 miles to the nearest highway. Year-round expansion, if approved, will bring more people into the greater Tahoe Basin erasing what little shoulder seasons are left.

Officials must acknowledge the hazards that accompany the combination of [development-fueled wildfire](#) and [overtourism](#). TRPA and county officials are instead enamored with a [new jargon-filled](#) tourism plan. Residents contend it is nothing more than rearranging the deck chairs on the Titanic. It fails to address the gravity of Tahoe's larger [people problem](#).

July 4 tourists left mountains of garbage, at least [8,500 pounds](#), on the Lake's east shore alone, spawning viral coverage worldwide. Day trippers, bikers, hikers with dogs routinely trash beaches and [erode trails](#). Litter also attracts and harms wildlife. The lake is now home to record amounts of [microplastics](#). In short, ever-increasing numbers of people will further destroy the lake environment and complicate evacuations.

Adding insult to injury, the latest Tahoe tourism plan includes [proposals to tax](#) residents to pay for visitors. Wouldn't a better idea be to create an equitable visitor reservation system that establishes a new model for many overwhelmed locations?

Tahoe's fragile environment and limited local infrastructure is already overburdened. A [journalist covering](#) one public meeting later contacted a member of the North Tahoe Public Utility District who told him "there is not enough infrastructure for fire hydrants if too many projects are developed all at once."

Leaders must now admit the question is not if there's another massive wildfire, but when. It's not enough to expect each agency and jurisdiction to have its own plan. Fires don't respect boundaries.

One of America's national treasures, Lake Tahoe merits a comprehensive basinwide evacuation plan based on worst-case scenarios and a data-driven roadway wildfire evacuation capacity evaluation that encompasses residents and visitors.

All will benefit from a realistic update of the Tahoe Basin's carrying capacity. It's time to amend TRPA code to include specific modern-day thresholds such as evacuation, tourism, human capacity and traffic. It's only with an updated environmental health assessment that we can determine how much more development and tourism Tahoe can safely accommodate.

Pamela Mahoney Tsigdinos is a writer and Tahoe resident who volunteers with grassroots Tahoe Basin groups

From: Karen Fink <kfink@trpa.gov>
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Subject: FW: Comments RPIC Hearing 9/27/23
Attachments: [image001.jpg](#)

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Housing and Community Revitalization Program Manager
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From: Ann Nichols <preserve@ntpac.org>
Sent: Tuesday, September 26, 2023 1:10 PM
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Subject: Comments RPIC Hearing 9/27/23

For the record....

TRPA's Cap on Development Obscures the Real Facts

The TRPA's existing Regional Plan has created such an unbelievable web of complexity, that, TRPA, as author of its cumulative accounting dashboard (the claimed development cap document) can't clearly describe it. There are numerous omissions and inconsistencies.

The Accounting must include a discussion of the topics below, their environmental impacts with updated numbers before more Placer Tahoe Basin Area Plan or TRPA Regional Plan amendments go forward:

1. Short Term Rentals (really TAUs per the TRPA definition) are not counted, considered or their environmental impacts described.
2. Failure to consider or enumerate Bonus Units (2 units for each existing unit deed restricted for achievable, affordable or moderate housing), originally 1400, now 960 left. 440 already used.
3. Fails to account for conversions and transfers from one area to another. For instance, Colony Inn Taus from South Shore went to Waldorf Astoria in Crystal Bay. Tahoe Inn units go to Homewood CEP project.
4. Fails to account for ADU's, JDUs or Tiny homes, California Conservancy entitlements, local jurisdiction's, or Nv State Lands rights/entitlements or consider the environmental impacts.
6. 2019 data is old. Current data required.
7. Morphing of motel size TAUs into large condo/tel units, the impacts on population, traffic and the environment.

Development can't be effectively metered or the public adequately informed without having a coherent accounting. Agencies depend on public trust. This kind of sloppy accounting should be setting off alarm bells everywhere.

Sincerely,

Ann Nichols

Sent from my iPad

From: hneff9@earthlink.net <hneff9@earthlink.net>
Sent: 9/26/2023 2:18:09 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: Alyssa Bettinger <abettinger@trpa.gov>; Cindy.Gustafson <cindygustafson@placer.ca.gov>; 'Hill, Alexis' <AHill@washoeconomy.gov>; Shelly Aldean <shellyaldean@gmail.com>; Jessica Diss <jdiss.trpa@gmail.com>; James Settlemeyer <JSettlemeyer@dcnr.nv.gov>;
Subject: TRPA Regional Plan Implementation Committee Members
Attachments: [2023-09-27 TRPA Phase 2 Housing Admendments.pdf](#)

Dera TRPA Regional Plan Implementation Committee Members -

Attached is written public comment for agenda item 3: **Informational Update and possible direction to staff on the Phase 2 Housing Amendments**

Thank you,

Helen Neff

Crashes are not Accidents. We can prevent crashes.

Helen Neff
PO Box 5647
Incline Village, NV 89450
hneff9@earthlink.net / 775-560-4299

September 26, 2023

Dear TRPA Regional Plan Implementation Committee Members:

RE: Informational Update and possible direction to staff on the Phase 2 Housing Amendments

As you consider housing amendments that will forever change town centers and areas zoned for multi-family, please remember that your decisions will affect all residents and visitors. You have the opportunity to create vibrant communities that work together for the benefit of all or you can focus just on allowing more height and density without addressing other issues. Some concerns:

Complete Streets

- How does the new proposal strengthen the current Code of Ordinances in regards to Complete Streets?
- It simply says Complete Streets are covered in section 36.5 with a footnote: *[4] Plan for sidewalks, trails, and other pedestrian amenities providing safe and convenient non-motorized circulation within Centers, as applicable, and incorporating the Regional Bike and Pedestrian Plan.*
- Then go to 36.5 and the only reference is: 36.5.5. Bicycle and Pedestrian Facility **Maintenance** Plan. Yes, only maintenance is referenced.
- **How will Complete Streets be addressed with these proposed changes allowing for more height and density? Please involve TRPA Transportation Planners to make this a reality.**
- However: Please do not repeat the problem that occurred after “Complete Streets” principles were supposedly applied to Kings Beach with the elimination of traffic signals. The result is that pedestrian traffic crossing SR28 to access the beach is not metered. From the end of June to the middle of August, traffic can back-up all the way to Incline Village, halfway to Brockway Summit and through Tahoe Vista because pedestrians are constantly crossing in Kings Beach town center with no pedestrian controls. This just serves to irritate motorists.

Pedestrian and Cyclist Safety

- During the webinar held on September 19, 2023, we were told that “development is planned for town centers where walking and biking is an option.”
- Please take into account the current situation:
 - Few people walk or cycle in Incline Village due to safety concerns.
 - Like many small communities located on a state highway built to design standards that favor high-speed motorized vehicle and commercial traffic, we are not safe nor comfortable with alternative modes of transportation when accessing SR28.
 - Thus, we revert to using our vehicles. Planning for a truly walkable town center means addressing transportation challenges for pedestrians and cyclists.

Current Development

- TRPA has already approved Nine 47 Tahoe, a four-story 40-unit condominium development in Incline Village with the premise that the development would create a walkable town center.
- Approval was given with no regard to the unsafe intersection at SR28/Southwood/Northwood (east).
- NDOT has not painted the bike lane on SR28 for years, despite painting the center vehicle stripe annually. Our bike lanes were a faded memory for years and are now paved over and eliminated with the 2023 repaving and road construction.
 - We are waiting to see if the bike lane re-appears and if our crosswalks will be painted.
- TRPA, TTD and Washoe County all tout their great partnership with NDOT but when will this partnership work together to provide Incline Village with a true “Main Street” rather than a speeding highway with a crash rate far above the national average?
- **All we see is one government agency passing the buck to another and no results. This makes it harder to accept housing code changes that will further worsen public safety.**

Parking/Fire Evacuation

- As recommended in the report, transit options need to be addressed FIRST – not later.
 - To quote the report: *“This raises a classic chicken-and-egg scenario: we need people-centered land use in town centers to support transit service, but successful people-centered land uses depend on quality transit service. **This scenario requires that land uses anticipate the planned transit and align parking requirements accordingly.**”*
- Ditto for fire evacuation. **Land uses must also anticipate safe fire evacuation for all residents.**
- We were told during the webinar that “fire evacuation is not an issue because the proposed housing will be located on an evacuation route.” But the newly added residents still need to be evacuated! And, on the same exit roads as everyone else. Where is the roadway-by-roadway evacuation plan?
- Please listen to those of us that live and work in the Tahoe area and provide solutions to resolve both of these issues.

Increased Coverage

- It might seem minor ... but ... 70% coverage will mean the loss of trees in town centers.
- Yes, we DO need forest management and defensible space around houses.
- No, we do not need 70% coverage, bigger buildings, no trees, and a warming climate.
- We are seeing more hot summer days in Tahoe and that is not going to change.
- Not all of our workforce has the luxury of being able to spend the day at the beach.
- **Please remember the importance of trees in our town centers to keep workforce housing comfortable for the residents without the need for A/C.**

Thank you.

Helen Neff

Incline Village Resident

From: Karen Fink <kfink@trpa.gov>
Sent: 9/26/2023 10:52:18 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: FW: Affordable Housing Feedback
Attachments: [image001.jpg](#)

Karen Fink, AICP
Housing and Community Revitalization Program Manager
Office: 775-589-5258
kfink@trpa.gov



From: codywin (null) <codywin@aol.com>
Sent: Tuesday, September 26, 2023 9:41 AM
To: Karen Fink <kfink@trpa.gov>
Subject: Affordable Housing Feedback

Hi there Karen,

I really appreciate all the work TRPA has been doing to address housing affordability. I attended the presentation you gave last week and definitely learned more than what I was able to gather from what is published online. The transparency of the process has been great.

In addition to submitting to the survey you sent yesterday, I wanted to add some additional comments for the committee's consideration:

Point 1:

I am concerned that the scope of housing affordability is not defined in a way that addresses the future economy of the basin. The "workforce" will not merely be folks working at restaurants, bars, shops, ski lifts, or casinos, etc. **The pandemic has accelerated a shift toward more professionals and other remote workers** such as myself (and a number of my neighbors). This is already altering the economic needs of the basin now and in to the future.

Point 2:

In this vein, I would ask that code amendments also focus on how to promote **permanent housing** instead of simply more affordable housing. The best way to achieve this would be through **ADU construction** under the provisions already laid out by the state of California. What is missing is **allowing the additional coverage** for neighborhoods already identified by the state.

Point 3:

The synthesis of these points can best be explained with my family's story:

My wife and I have been coming to Tahoe since we met in 2007. We dreamed of having a home here, and when the pandemic upended the world in 2020, we decided to buy our first home in South Lake. Since then we had our baby girl and hope to raise her here. However, we are running out of space to accommodate our growing family and the space needed for our work. It is not feasible to buy another larger property because anything over 3 bedrooms enters the million-dollar-plus luxury housing market. This presents a difficult question: will we have to give up our dream of living here to find space for our family?

The solution for us, as well our community of other new parents, is to allow us to build the additional space on our property that meets the standards for ADUs. We hope to utilize this for our immediate space needs, but in the future it could also accommodate renters within the deed restrictions. While ADUs are technically allowed, the vast majority of residents will not be able to build them due to coverage limitations.

TRPA should grant additional coverage to allow for ADUs, which could be limited to full time residents. This will allow greater permanence for those of us who live here, **it is cheaper to build than multifamily buildings, provides growth in tax revenue, and supports the future economy of Tahoe.**

Conclusion:

Without the proposals I've listed here, I worry that housing affordability efforts currently proposed will only meet issues of today and not provide for the future.

Thank you for your time and consideration.

Cody Winchester
South Lake Tahoe

From: leah kaufman <leah.lkplanning@sbcglobal.net>
Sent: 9/25/2023 8:34:49 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: Gavin Feiger <gavin@keaptahoebblue.org>; Alexis Ollar <alexis@mapf.org>; Alexis Hill <AHill@washoecounty.us>; John Friedrich <jfriedrich@cityofslt.us>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Vince Hoenigman <vhoenigman@yahoo.com>; Brooke Laine <bosfive@edcgov.us>; Leah Kaufman <leah.lkplanning@sbcglobal.net>; Shelly Aldean <shellyaldean@gmail.com>;
Subject: RPIC comments
Attachments: [RPIC letter.docx](#), [20230925_152317.jpg](#), [20230925_152311.jpg](#)





Please send to RPIC and governing board memers for the meeting on the 27th..
Thank you
Leah kaufman

KAUFMAN PLANNING AND CONSULTING
PO BOX 253
CARNELIAN BAY, CA 96140

September 25, 2023

Dear TRPA RPIC members,

I am writing based on the feedback I have received from talking with hundreds of people from my community on the North and West shore of Lake Tahoe regarding the proposed TRPA housing amendments and other planning issues. I also have comments on the proposed code changes that are being considered for historic structures.

I am a semi-retired 40-year local land use planner with no large projects or financial gain, an ex TRPA employee, and was the longest standing member of the North Tahoe Design Review Committee. I have engaged in communication with several of the board members for many months regarding the proposed amendments and problems within the basin. You have heard them all- (prolific STR's, that could potentially house 10-15% of the workforce, 44,000 locals (Source Tahoe Fund) serving 25,000,000 annual unmanaged tourists (Source Nevada Dept of Transportation), a lake that is suffering from microplastics, invasive species and trash, construction and traffic congestion in our summer months, continued approval of luxury condos and McMansions, unfair housing practices between the two states, etc. Problems we are told, "we are working on it" but in my forty years have only gotten worse. I have submitted articles on what other ski area communities are doing and have made suggestions in every letter written.

TRPA staff and board members are currently soliciting feedback based on a desire to amend codes to allow NEW "achievable" housing **basin wide** coming with increased height, unlimited density allowances (a change since June when 60 units per acre density was proposed for outside Town Centers), 70-100% land coverage, reduction of parking to a maximum of .75 spaces per unit, and no setbacks. The "stated intent" is to consolidate the remaining development potential of bonus units (960 or so reported entitlements") for "achievable" and or affordable housing.

The following are my concerns, questions and needed clarifications.

1. Amendments are not just for consolidation of entitlements into the Town Centers. They are proposed anywhere multiple family housing zoning is allowed. This sprawls into neighborhoods, (Kings Beach Grid- Tahoma Residential), and impacts Carnelian Bay Gateway, two miles and hundreds of parcels in Tahoe Vista, Lake Forest, Dollar Hill, Homewood, and Tahoma, plus identified transition areas. Amendments include greater heights, unlimited densities (which do not currently exist) and can potentially affect change in a neighborhood and the built environment.
2. I did not see any environmental analysis to accompany the proposed code changes? What level of Environmental review will be forthcoming?

3. TRPA examples for “achievable housing” projects are shown on 12,000 sf lots. There are hundreds of parcels within the areas described above, that are 2, 3, 4, and 5 acres in size that would have very different impacts with the proposed density, height and land coverage overrides. These amendments could create hundreds of so-called “*achievable housing*” units, not to be confused with “*affordable housing*,” that are expected to rent at \$2,450/month for a 650-sf space located in supersized buildings to be profitable. This type of housing is decidedly *not* “*affordable*” for those in the seasonal J-1 workforce, and moreover to the minimum wage workforce that power our retail, hospitality, and service industries. These small apartments do not serve the needs of our local families. Once the code changes are approved it will likely lead the way for projects that are not just workforce housing based, but that facilitate more luxury vacation condos. Density overrides and additional height should come with requirements to build a percentage of housing that is truly affordable based on income qualifications and not just a 30-hour work week requirement as defined in “Achievable” definitions.
4. We have been told “no more than 200 units” would be spread out in each community basin-wide but where is that written? Dollar Hill Crossing is a proposal for 118 affordable and market rate units. Would this be considered as part of the 200 units planned for our area? How does TRPA intend to spread out the entitlements in an equitable manner between communities and the north and south shore?
5. If one retires a parcel of land and receives a bonus unit does that increase the bonus unit pool over the 960 allocations?
6. Renderings used by TRPA staff at the Summit and Farmer’s Markets, and on the website to solicit feedback on “Height for Housing” are **disingenuous and misleading** and DO NOT represent the TRUE Height of what the TRPA proposals are or the target users of such housing. (Please see attachment). The TRPA triplex is only 36 feet high not 48 feet as proposed **outside** town centers for transition areas, and the single building is intended to be 44 feet high at its highest point not 65 feet as is proposed **inside** Town Centers on the Northshore. The renderings were changed at the zoom meeting held last week (September 20th), to include the Domus project in Kings Beach which is approximately 46 feet high but is not the rendering TRPA used to solicit community feedback for additional height. Heights of 65 feet should be shown to the public before surveys are taken requesting if the public has support for such heights. TRPA also did not identify if it was community members, tourists or exactly who was interviewed in Farmers Markets and other venues. These TRPA surveys are skewed and deceptive.
7. Elevation drawings with adjacent properties to scale will show the relationship and height more truthfully than perspective drawings which can’t be drawn to scale.
8. Please identify those areas considered as transitional via assessor parcel and color-coded mapping. (How far do they extend from the Town Centers in all directions?)

Section 37.5.5 simply states adjacent and contiguous to Town Centers. This is very broad based and ambiguous.

9. 35 community members spent four years crafting amendments for the TBAP where the height within Town Centers is allowed 56 feet (more height than was desired) but heights approved, nevertheless. The Northshore community **DOES NOT** want to have 65 feet of height regardless of if it is “a bargain” to the developers to build this housing. 65 feet in our Town Centers would tower and shade neighboring properties and would be completely out of scale and context with existing development. Neighbors are complaining about loss of shade from just one 29 foot newly constructed building in the Kings Beach core. Perhaps these heights are better suited for the south side of the lake that has taller buildings and is more urban. Rules do not have to be homogenous basin wide.
10. TRPA requirement that the County must show progress towards achieving housing if they don't like the amendments comes with a big stick and is subjective.
11. California Rezone laws in Placer County outside of the Tahoe Basin except for Alpine Meadows and the mobile home park near Truckee on Highway 89 were recently approved for a 30 unit per acre maximum density for housing. This was to qualify for housing and other grants from the State. Unlimited density overrides do not appear to exist in any other community that I have researched and especially is concerning in the basin containing a scenic resource such as Lake Tahoe. Language should be added in the code to differentiate between overrides on a 12,000 sf lot vs overrides on parcels over 1 acre in size. Section 31.4.8 is too broad based. The code does not differentiate between the smaller lots and large acreage parcels however impacts of unlimited density and land coverage overrides are very different for the different lot sizes. Example: Project involving a duplex or triplex 35 feet height on a small half acre or ¼ acre parcel has very different impact than projects that have the potential for hundreds of units on a larger parcel with the same zoning. The code should be amended to account for these differences and limitations imposed for density and height if over a certain parcel size. i.e, ¾ to one acre parcels must have reductions in density and coverage overrides and additional parking allowances, setbacks etc.
12. Placer County TBAP proposed amendments come with no parking minimums for commercial, retail, housing and other proposals. TRPA amendments come with .75 parking spaces per unit maximums. Section 34.4.4-1 How do these rules interface with each other? .75 parking spaces per unit does not breakdown by size. Is this requirement the same for a studio as it is for a three-bedroom unit? There was nothing in the code that states any differences.
13. Where are the rules that force the larger employers to provide housing for their employees and incentives to allow redevelopment of blighted structures etc? As an example, Palisades has 3,000 employees, with only 40 beds on site, and 200 beds offsite

from Kings Beach to Truckee. Approx. 50% of their employees have cars and are driving from all over to go to work. Housing should be required on site as is done in Colorado ski resorts.

14. Housing workers in hotels reduces the available TOT tax base and must be thoroughly evaluated for this loss of revenue. Section HS-3.1 states that TRPA should work with local jurisdictions on long term residency in motel units. Is that something that should be encouraged?
15. Dollar Hill Apartments has 17 units of studio and one-bedroom units with 25 parking spaces and the manager states that they are constantly shifting cars especially in winter and that 25 spaces are not enough. Is it feasible to expect that our workforce (contractors, teachers, hospital workers etc. do not have cars)? TRPA did their own study and found that 66% of those surveyed have two or more cars. Parking should be realistic based on working conditions.
16. The TRPA zoom meeting September 20th had 100 questions that I could not see and 80 participants mainly from the north shore. The questions should be included in Governing Board packets for Board members and all the public to see, not just on the website.
17. Proposed code changes need some clarification. Please define what it means that TRPA standards “supercede Area Plans? Does this imply that Placer County must allow the height and density overrides automatically and that adopted Area Plans with height and density standards no longer apply? Code section 37.5.5 does not identify areas eligible for additional height? Section 30.4.4 B.6 is confusing. The language intent is that projects must associate with area wide storm water systems in order to get incentives, but the language also states that site BMP’s are acceptable. Since all parcels in the basin are required under Compact mitigation measures as part of “carrying capacity thresholds” to install BMP’s this is not a above and beyond expectation to allow excessive heights, coverage and density overrides.

HISTORIC: Additionally, TRPA proposes code changes to historic resource reviews. In the past State Historic Preservation Office (SHPO) review was required for historic structures however they have not reviewed single family dwellings for years and TRPA approves removal of historic structures based on receiving no feedback from this agency. TRPA code changes would allow staff to review recovery plans and for Hearings Officer review only for designated structures not structures that are proposed to be included on the historic register where historians have recommended that they be included or designated as historic. In the past TRPA would actually require historic structures whether designated or not to be preserved, relocated, repurposed on site and/ or advertised for removal offsite. Recovery plans recently proposed are meaningless- staff can make a finding that if a window is saved that is a recovery plan. I oppose

code changes as they have not been vetted and are whitewashing the intent of historic preservation. NO single-family iconic or otherwise historic structures will ever be saved based on proposed TRPA code amendments.

Summary:

Our communities can certainly be enhanced by continued redevelopment within the existing framework that was developed by the community in 2016, at currently allowed heights of 56 feet in Town Centers, (which is more than the community called for), with plans for adequate infrastructure, reasonable constraints on density and land coverage, and spreading out of housing in every community. “Achievable” should be mixed with affordable income qualifiers or the “low and moderate” housing will never be built. Proper CEQA and NEPA analysis is needed to accompany the proposed code changes.

It’s important to make sure we are investing in programs, that INCENTIVIZE repurposing of abandoned buildings, etc. that have the infrastructure and parking in place, and conversions of existing structures from empty commercial spaces to housing, instead of only focusing on building new units. STR’s should be reduced, to free up long term rentals, vacancy taxes imposed, and McMansions and luxury condos rules reexamined. These uses create a workforce and thus should mitigate the jobs they create. Programs such as lease to locals, and free ski passes for rents should be funded and encouraged.

Our supervisor knows the community sentiment. The local architects, designers, and engineers tell us that **no** additional height is necessary to craft good profitable designs, yet TRPA is relying on one housing developer saying that overrides for everything and excessive heights are the basis for TRPA amendments. The community would like TRPA to go back to their housing consultant and determine what the proposals would look like on larger than 12,000 sf lots and with heights that do not exceed approved conditions in the Town Centers. The community members are not “Nimbys”, we are not “selfish”, we are not “uncaring”. We want to see progress towards fixing what is broken, and we want housing for our workers. We also want to balance our nature-based communities with future developments.

Respectfully submitted,

Leah Kaufman-

Principal Planner

Enc.





From: leah kaufman <leah.lkplanning@sbcglobal.net>
Sent: 9/25/2023 5:27:30 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Comments to go rpac and gov board
Attachments: [09-26-2023 Public Comments for the Placer County staff & Board of Supervisors.pdf](#)

[Sent from AT&T Yahoo Mail on Android](#)

Public Comments for the Placer County staff and Board of Supervisors

Date September 26, 2023

It may be enlightening for all to know that people living and working in the North Tahoe area really do care about their communities and have great knowledge about what improvements will work and what they want in their towns.

These people include professionals such as architects, engineers, land use planners, environmental scientists, Real Estate professionals, small business owners, developers, contractors and more. These people work with everyone else who works in the region. They know what is effective, what is needed, and they also know what is abusive, ill-conceived and greed driven.

They know that most of the county planned code changes have been designed to please larger project developments, and try to bait financial companies to back these large projects in the risky business of new resort developments, all in the name of progress. But is it progress to miss the mark and develop the wrong product?

The answer to that is all the misguided plans that Placer County CEP and Placer County Redevelopment Agency tried, and to this point, have not been able to get into place. Redevelopment district formed in the mid 1990's took tax funds away from the north shore of Tahoe to be used to redevelop the area. The county reminds us often that the spent "a lot of money redoing the streets and sidewalks in Kings Beach". Yes, and that was the tax money they got from Kings Beach, being used where it was earned. The county under the guise of the redevelopment agency bought up several town center parcels of land, taking them off the tax rolls and then has been holding them, somewhat for ransom, to find a single buyer, a single use that investors find is not financeable. Perhaps it is not a good investment???

Realtors, architects, engineers, land use planner and builders in the area have found local buyers interested in keeping in scale with the community, making a more "Mom and Pop" investment with commercial spaces on street level, owner or workforce housing on second and third floor, and make a sustainable and attainable business model in the town center. We have engineers designing 3-4 story resort mix commercial building within the code that will pencil out. We have solutions that are acceptable to the current codes and to the town character.

We have need for workforce housing. Most of our workforce that make under \$100k per year cannot afford to buy a home here. They also cannot afford to rent at prices over \$2500 for a single person per month. They find it most economical to pay for a 3-4 bedroom home with room for their spouse and family that costs them under \$3000 a month.... In Reno or Carson City or Portola or Minden and Gardnerville.

Plans to build workforce housing look like they are designed for a person who's scenario does not exist. Hopkings Village: \$615k purchase price, 2 bedroom small, a buyer will need \$125k down payment for a conventional loan, 7% interest loan will require them to make over \$200k per year to qualify. While this will help wealthy local workers—Doctors and lawyers, it won't help most the workforce whose wages are not near that amount. In Kings Beach the design modifications would allow zero set backs and 5-6 story high buildings creating a massive change of character and ruin the properties surrounding the building, less parking requirements (because we all know that buyers of \$2million luxury condos always take public transportation) and the workforce housing in these would be 650 sqft, room for one person, who

has no car, and pays \$2400 per month rent, (because we all know that a restaurant server make lots of tips, and a ski area attendant gets \$8000 a month income, and a house cleaner can take public transportation to clean all the STR's on her route).

Again, who are we building for??? If we need workforce housing make it something workforce can use, can afford and something close to their or if they are seasonal: i.e. ski area employes should be housed in or very near ski areas. To attract families we must have 2-3 bedroom homes or apartments with parking for 2 cars at the least.

And do we need more high-end vacation housing? Not if we are hoping to relieve the neighborhoods from the over exploitation of STR changing the scope of what a single family residential zoning means. We need more moderate priced motels, hotels. Places for short term over night stays near the recreational amenities that tourists want to enjoy. We need them in commercial areas where visitors can walk to restaurants and enjoy beaches, jump on the public transit to go skiing and sight seeing.

Let's build what we can use!! What our vacationers can afford and use. Let's not cater to high end developers who build big, add cluster, congestion and make their money and leave us in their wake to deal with the shit.

I applaud the other letters you are receiving, and I attach this to Ellie Waller's more in-depth analysis of the questionable actions taking place in the north Tahoe, eastern Placer County region.

Since you are always counting: "this comment represents one person's opinion" etc etc. Well, add this to the count, **this letter represents 2400 people!!** Everyone I talk to says: "say it for us too!!"

Please know that I can get 1000's of signatures from people here who applaud these comments, **ask that you, the staff and the county supervisors, represent the people who live here and not just the developers. We ask that you keep us safe from emergency evacuation panic and congestion, that you vote as if you lived here, because often you don't.** We feel we worked hard to establish the current codes and we want to have development live by those codes. We know it can be done. We know that you also represent a special place, Lake Tahoe. We know that your interests to keep it environmentally pure are sometimes clouded by \$\$\$\$.

Thank you, respectfully, Sue Daniels, Dan Daniels, and family, and friends. And people of the north shore Tahoe, and the west shore Tahoe, and the east shore Tahoe! People who have lived here before like my grandparents in the 1940's, my parents from the 1950's on, my mom who is 92 and worries that the best times of Tahoe are disappearing too fast. From all the legacy families who have never gotten rich and who have fought so hard to keep Tahoe fresh and pure and beautiful for the whole world to see.

From: Karen Fink <kfink@trpa.gov>
Sent: 9/25/2023 8:41:29 AM
To: Public Comment <PublicComment@trpa.gov>
Subject: FW: [BULK] Policy change comments on affordable housing
Attachments: [image001.jpg](#)

Karen Fink, AICP
Housing and Community Revitalization Program Manager
Office: 775-589-5258
kfink@trpa.gov



From: Carol Daum <gncdaum@gmail.com>
Sent: Sunday, September 17, 2023 7:50 PM
Cc: The BOSFIVE <bosfive@edcgv.us>; PublicComment@cityofslt.us; Karen Fink <kfink@trpa.gov>
Subject: [BULK] Policy change comments on affordable housing

To whom it may concern,

I am writing this letter regarding the TRPA Sept 19 Zoom meeting at 5pm on Achievable/Affordable Housing Policy changes.

First I want to acknowledge the time and effort which has been put into this important endeavor. Secondly, I am disappointed that this meeting has not been written about in searches of the local newspapers. Has the City Council agenda'd these proposals in a special meeting for public comments? I hope the TRPA will allow time for this before changing their policies. Feedback is important to come up with the best plans.

I have some thoughts and concerns regarding the following policy suggestions in #1 & 2, and propose some related suggestions to affordable housing in #3,4 &5 for consideration:

1. I am very concerned about TRPA statements (in blue) implying the impact on fire evacuation is *okay*, and not TRPA responsibility by stating: "*Local fire and law enforcement entities are responsible for evacuation planning, not TRPA*" (Shouldn't health, safety and welfare be all government agencies' responsibility in developing any government policy)?

- "*The proposed changes are focused on town centers, where wildfire danger is inherently less because they are further from forests, there is more defensible space and pavement. New developments are subject to local building standards that are built to withstand fire and... can be used to shelter in place*".
- "*Local fire and law enforcement officials would qualify for the housing built under these changes*". (This would imply first responders would void their oath to approve these TRPA policy changes and put the needs of themselves above the health, safety and welfare of the community).

2. I am concerned with the open ended proposed policy change to "unlimited density" and "no maximum coverage" without "requiring parking" in residential neighborhoods deemed "town centers."

Please consider *1 ADU per parcel* would be more practical for fire evacuation; because, as a lifetime community member I have experienced neighbors and I have friends living next to an unpermitted ADU home broken up into 3 units. Last winter there was no room for both parking and snow removal. The result was the ADU home blew snow into the neighbors parcel burying their gas meter and rocks chipping their windows. They now have a feud with the neighbors and can not get a restraining order due to being next door. The problems with overcrowding parcels will get worse with parking in the streets interfering with snow removal. The new city garbage trucks and trash cans in the winter will be another obstacle as well as additional mail boxes. With the cold weather environment, only 4% of Tahoe households not having a car, and new electric/hybrid efficient cars, it is responsible design for parking to be properly planned for... and not ignored. *There should be conditions with obtaining a permit that have to be adhered to, and consequences of fines or losing a permit when they are not courteous of their neighbors...just like vacation rentals should.*

3. The effects of Prop 19 had a negative impact on affordable housing by deceptive advertising. Before Prop 19 parents could pass property to their children, and they could rent long term without having property absorbently increased by the largest increase in state history.

Planners and community leaders should support reversing Prop 19 by supporting Assembly Constitutional Amendment 9, introduced by Assembly Member Kevin Kiley (R-Rocklin), which would reinstate Propositions 58 and 193 to the state constitution. ACA 9 will restore Proposition 13 benefits to children, preserving the legacy of parents and grandparents who have worked for decades to pay off mortgages on homes thereby helping to lower rents. help by going online to reinstate58.hjta.org to download a flyer that you as planners and leaders should share with the community if you want to promote affordable housing.

4. Please use your influence as leaders with the State Insurance Commissioner. Also consider that "adding density" to the city will likely continue to raise insurance rates. As a landlord I will now sadly have to raise my tenants rent. Why?

Because of being *forced* to purchase the CA Fair Plan. Residential property owners are forced now to purchase - 2 plans! A Difference in Conditions plan which covers liability, leaky pipes, roof failure or etc *plus* a separate fire (CA unfair plan). Property owners should be able to decide for themselves what risks and coverages they want if a property is paid for. Property owners should have the ability to fire just as you can "choose" to have earthquake insurance. However the Insurance Commission "regulations" are now contributing to housing being unaffordable. One must now show proof of the CA Fair Plan *before* purchasing any additional insurance. Sadly, that feels like extortion.

5. Please consider influencing any governmental agency to purchase the meadow parcel next to the Truckee River that is for sale next to Motel 6. It appears to have a buildable area. TRPA could influence BMP's and variances for multi-family housing on the east side of the river and a greenspace bike or walking path opportunity that could have a very positive impact on the community?

Respectfully,
Carol Daum

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From: Ellie <tahoellie@yahoo.com>
Sent: 9/24/2023 10:15:31 PM
To: Public Comment <PublicComment@trpa.gov>
Cc: Karen Fink <kfink@trpa.gov>; Alyssa Bettinger <abettinger@trpa.gov>;
Subject: TRPA Governing Board 9-27-23 Public Comment for RPIC and Governing Board

Please provide this public comment to the TRPA Regional Plan Implementation Committee and Governing Board members and appropriate staff. Thank you ~Ellie Waller

Achievable Housing in the Lake Tahoe Region: The recent 54 minute webinar held by the TRPA <https://storymaps.arcgis.com/stories/62ae9110d85c43ecb381eb3f3ccec196> was yet another example of cutting out true public participation.

- 1). Did you really think one hour was a sufficient amount of time? This is a contentious topic.
- 2). Not allowing the public to view all questions being posed by participants is not transparency.
- 3). Hard to determine how selection of questions to be answered (approx 80-90) was done.
- 4). When will all questions posed be answered and published?
- 5). When and how will neighborhoods affected by these proposed changes be notified of multi-family availability in current single-family neighborhoods?
- 6). Reality is community character will change.
- 7). Reduced parking strategies unrealistic based on published info.
- 8). Each individual neighborhood is unique. Cookie-cutter code proposals just don't work. One-size does not fit all

Here are some articles from the past two-three years that capture issues. This isn't just about the public's dis-satisfaction of the direction TRPA is taking on affordable housing but in other areas in California.

This begs the question: How does TRPA expect Nevada to adopt similar suggestions in the current proposal? This is a Bi-State Compact and each state has different approaches to housing.

<https://www.ocregister.com/2021/06/28/orange-county-cities-sue-state-over-new-homebuilding-goals/>

Orange County cities sued the state housing department over its projected homebuilding requirements for the next decade, arguing the state agency grossly overestimated the number of new residences Southern California must plan for by 2030.

<https://www.ocregister.com/2021/01/09/more-cities-than-ever-are-protesting-rhna-allocation-of-homes-theyve-been-told-to-plan-for/>Faced with housing goals they say are unachievable and a fall deadline to plan for them, more Southern California cities than ever before are fighting to have their allocations of new homes rolled back.

No one denies the region needs more homes in general, and there's been a specific push to get housing for low-income families built across the region.

But some city leaders say the 1.34 million new units assigned to the six-county area (including Los Angeles, Orange, Riverside and San Bernardino counties) is wildly overinflated, and there's no place in their communities to shoehorn the hundreds or thousands of additional homes they're currently mandated to put in their plans.

<https://www.cbsnews.com/sanfrancisco/news/controversy-erupts-in-atherton-as-state-housing-plan-deadline-passes/>

The law does not require towns to build or finance new housing--but they must PLAN for it. For the next 8 years, Atherton has been assigned 348 new homes for people in all income levels. The Council was considering what they call an "overlay zone" near the commercial corridor and local schools may add some housing, as well. They hoped that, and the ADUs, and the property on Oakwood would be enough.

<https://easyreadernews.com/redondo-beach-mayor-bill-brand-drafts-initiative-to-block-sb-single-family-zoning-bill/>

"In this case, it would be the voters of California, who want control of zoning in their towns. Do you want faraway legislators doing it, who have never even been to your town? Or do you want your local agencies, represented by people who live where you live? I thought the answer was clear.

"I realized if you were going to have that kind of transfer of power, you were going to have to amend the State Constitution, which I had never read. So I sat down and read it, and figured out, 'Oh, I see. We are going to have to amend Article 11, and transfer the power back to local communities."

Current law requires only that cities plan a certain amount of housing, not that it actually be built, and housing elements are often examples of meeting the letter of a law rather than its spirit. In this, Redondo's plan was not particularly egregious. Beverly Hills, for example, is attempting to meet part of its housing obligations by forecasting a 185-unit, mixed-income apartment complex on what is now a 10-story office building occupied by law firms, medical offices and salons.

<https://calmatters.org/commentary/2023/02/california-housing-element-government/>

Whether the pressure on local communities actually results in 2.5 million units is very questionable. That would require more than a doubling of current housing construction and other factors, such as interest rates, material costs and the supply of construction labor, tend to discourage construction.

<https://calmatters.org/housing/2021/01/california-housing-crisis-lessons/>

The 3.5 million number comes from a McKinsey study which I wonder how much time the Newsom team spent reviewing. Other housing experts and developers could have told you it was pretty impossible to ramp up development that quickly without massive, politically unpopular reforms. And even then it's dubious.

Gavin Newsom's housing lawsuit put 47 California cities on notice. Is yours on the list? <https://www.sacbee.com/news/politics-government/capitol-alert/article226293135.html>

[How California lawmakers greenlit 'any flavor of affordable housing you could possibly want'](#)

You may not have seen the headlines (there weren't any). You may have missed the raucous debate (there wasn't much of one). But with the [end of the legislative session](#) last week, California is now on the verge of laying down a welcome mat for most major affordable housing projects across the state.

That's not because of a single bill, but a patchwork of current and former legislation that, taken together, "basically covers any flavor of affordable housing you could possibly want to build," said Linda Mandolini, president of Eden Housing, an affordable housing development nonprofit.

<https://www.hklaw.com/en/insights/publications/2023/09/many-california-local-governments-face-tight-rezoning-deadlines>

California housing law requires every city and county in the state to update the Housing Element of that jurisdiction's General Plan every eight years. Among other things, each updated Housing Element must plan for the jurisdiction's new Regional Housing Needs Assessment (RHNA) allocation – a measure of how many new homes that jurisdiction is expected to accommodate during the eight-year period.

Has TRPA verified all jurisdictions in California have updated their General Plan Housing Elements and are compliant?

<https://www.hklaw.com/en/insights/publications/2023/05/california-court-of-appeal-decision-provides-new-guidance-on>

- The California Fifth District Court of Appeal's recent opinion in *Martinez v. City of Clovis* provides considerable guidance to local jurisdictions across the state as they wrestle with heightened housing element requirements and the consequences of failing to meet those requirements.
- The court conveyed reluctance to disturb Department of Housing and Community Development (HCD) determinations on housing elements as long as some evidence allows the court to discern HCD's rationale. Only where that rationale was both unexplained and inexplicable was the court willing to intervene.
- The decision provides important insight into the interplay between courts and HCD when reviewing housing elements for compliance with state law.

[California's 2022 Housing Laws: What You Need to Know | Insights | Holland & Knight](#)

AB 602 (Assembly Member Grayson) – Impact Fee Nexus Study Standards and Procedures

AB 602 imposes additional standards and procedures for agencies adopting impact fees. It requires agencies to identify an existing level of services for public facilities and information supporting the agency's actions in increasing fees and requires agencies to impose fees on a housing development proportionately to the square footage of the development or make findings for a different methodology. Agencies must adopt studies at a public hearing with at least 30 days' notice, notify any member of the public who requests notice of an impact fee nexus study and consider any evidence submitted by any member of the public that the agency's determinations or findings are insufficient. Large jurisdictions are required to adopt a capital improvement plan as part of the nexus study. Agencies must update nexus fee studies at least every eight years from the period beginning on Jan. 1, 2022. Agencies must also post the current impact fee schedule and update at least twice a year. Finally, the law directs HCD to create an impact fee nexus study template. With additional standards and procedures, more engaged oversight and comment on the impact fee process by housing groups and industry organizations may follow.

AB 491 (Assembly Member Christopher Ward) – State Law Requirement for Multifamily Developments to Integrate BMR Units and Provide Same Access to Common Areas and Amenities

AB 491 requires that, for any residential structure with five or more residential dwelling units that include both affordable housing units and market-rate housing units, the BMR units must provide the same access to common entrances, areas and amenities as non-BMR units, and the building "shall not isolate the affordable housing units within that structure to a specific floor or an area on a specific floor." Similar provisions have previously been included in locally adopted inclusionary housing requirements. Although clearly a new requirement, AB 491 states that it is declaratory of existing law (apparently a reference to the fact the authors believe that isolating BMR units may violate current fair housing or anti-discrimination requirements), which means that state and local building officials may apply it retroactively. It will be important to plan for affordable and market-rate unit integration from an entitlement, financing and construction perspective.

From: Karen Fink <kfink@trpa.gov>
Sent: 9/22/2023 8:56:32 AM
To: Public Comment <PublicComment@trpa.gov>
Cc: Seth Dallob <seth.dallob@gmail.com>;
Subject: FW: non-question feedback from webinar
Attachments: [image001.jpg](#)

See public comment for the Phase 2 Housing item on the September 27th RPIC agenda.

Karen Fink, AICP
Housing and Community Revitalization Program Manager
Office: 775-589-5258
kfink@trpa.gov



From: Seth Dallob <seth.dallob@gmail.com>
Sent: Tuesday, September 19, 2023 5:24 PM
To: Karen Fink <kfink@trpa.gov>
Cc: Jeff Cowen <jcowen@trpa.gov>
Subject: non-question feedback from webinar

Karen (and Jeff):

You may remember me from a couple of housing op-eds. I am a developer, most recently in Seattle as COO of NexGen Housing Partners, where I helped build 400+ units of market rate workforce housing. You can see our portfolio at www.nexgenhp.com. My wife and I moved to South Lake Tahoe 1.5 years ago, and I've largely been idle since then. I'm all ears to any introductions that may be of mutual interest.

While I have focused my feedback at City Council meetings, I'll share it with you and I'm happy to meet and discuss them at your convenience.

1. Deed restrictions make market rate financing much harder - many banks simply won't lend to deed restricted parcels (both construction and finance), decreasing the pool of potential financiers and increasing costs. You can achieve the same results that deed restrictions seek with large fines for non-compliance.
2. I don't see any provisions for buildings built for sale rather than rent; it's unfair to burden the buyer with a deed restriction. In Seattle's version of this, the first buyer needs to qualify and then the income restriction drops off.
3. Your existing deed restriction has language that forces occupants to move out if their income increases above a given threshold; punishes success and puts undue burden on them. It penalizes success.
4. Compliance costs for every occupant every year/every lease is burdensome for both TRPA and the landlord. In Seattle, we had to hire a full-time employee to do nothing but bureaucratize with the City. Basic statistics shows that you can catch 95% of violations with a 1-2% random sample audit. Back that audit with heavy fines for non-compliance. This will save TRPA and operators significant costs (and ultimately lower rents).
5. I need clarity which rules apply/which bonus units apply to which level of affordable/moderate/achievable.
6. A much broader point - 100% affordable properties promote ghettoization by concentrating poor populations together; it's better for the fabric of society to consider incentives for buildings that are 20-30% affordable, spreading the externalities throughout a larger area.

Again, I'm happy to discuss this with anyone that will listen, anywhere, anytime, with the ultimate goal of teaming up with a local property owner/developer to realize construction of these types of units.

Sincerely,
Seth Dallob

From: Niobe Burden Austere <niobe.burden@gmail.com>
Sent: 9/22/2023 8:29:31 AM
To: BoardClerk@placer.ca.gov <BoardClerk@placer.ca.gov>; Public Comment <PublicComment@trpa.gov>; Cindy Gustafson <cindygustafson@placer.ca.gov>; Julie Regan <jregan@trpa.gov>; Jeff Cowen <jcowen@trpa.gov>; Hayley Williamson <hayley.a.williamson@gmail.com>; Ashley Conrad-Saydah <ashleyc@alumni.princeton.edu>; Brandy McMahon <bcmcmahon@trpa.gov>; Steve Sweet <ssweet@trpa.gov>; Jennifer Carr <jcarr@ndep.nv.gov>; Tiffany Good <tgood@trpa.gov>; Vince Hoenigman <vhoenigman@yahoo.com>; Crystal Jacobsen <CJacobse@placer.ca.gov>; Kat McIntyre <KMCMintyre@trpa.gov>; Bruce Barr <bbarr@trpa.gov>; Shelly Aldean <shellyaldean@gmail.com>; James Settelmeyer <JSettelmeyer@dcnr.nv.gov>; Alexis Hill <AHill@washoecounty.us>; Belinda Faustinos <belindafaustinos@gmail.com>; Ben Letton <ben.letton@waterboards.ca.gov>; Jessica Diss <jdiss.trpa@gmail.com>
Subject: Fwd: Sustainable housing allocation /development in a sensitive environment

Please accept this email as **Public Comment** for the posted meetings on Sept 26 for Placer County Board of Supervisors and Sept 27 for the TRPA Governing Board

----- Forwarded message -----

From: **Niobe Burden Austere** <niobe.burden@gmail.com>
Date: Wed, Sep 20, 2023 at 2:45 PM
Subject: Sustainable housing allocation /development in a sensitive environment
To: <CAHousingFuture2040@hcd.ca.gov>, John Garamendi <ashley.therien@mail.house.gov>, Edgar Rodriguez <edgar_rodriguez@padilla.senate.gov>, Edward Heidig <edward.heidig@mail.house.gov>, Heidi Mayerhofer <heidi.mayerhofer@sen.ca.gov>, Nicole Rinke <nicole.rinke@doj.ca.gov>

Please acknowledge receipt and distribute to make aware, with discussion as deemed necessary

To whom it may concern -

Please take note and work with the governing jurisdictions (TRPA, Placer and Eldorado Counties) of north lake Tahoe communities of Tahoe City, Tahoe Vista, Homewood, Tahoma, Sunnyside and Kings Beach to find creative solutions for "affordable housing". In local government jurisdiction response to CA SB9, the **current "achievable housing" proposed** solutions are not achievable for the current workforce, except the Bay area remote tech workers who can obtain a business license and afford a "deed restricted" unit. There is no income cap on the guidelines and it is **NOT addressing the real problem of service workers not being able to RENT something affordable**. Why would a "missing middle" local family live in a condominium without a yard for their kids when they can live in a house in Reno. The remaining "missing middle" that I've spoken to whom I work with in the Tahoe Forest Hospital District can't afford to purchase any of these proposed "deed restricted achievable" housing units.

One of the largest obstacles to building "affordable" housing in the Tahoe Truckee area is the **substantial costs involved building within an environmentally sensitive environment and meeting thresholds for protection of Lake Tahoe**. Therefore, proposed projects do not "pencil" without additional density and alternatively they want to encourage projects with more density and proposed "deed restricted, achievable housing". Parking is also not being planned realistically. Rather they propose to allow more coverage/density, and leave it up to the developer but let us not digress. This is very different than "affordable housing" but it satisfies most developers for profitability. Local jurisdictions including Placer County and the Tahoe Regional Planning Agency (TRPA) are **proposing increased coverage/density with additional building height up to 65 feet in the name of "achievable, deed restricted" housing**. These proposed projects (ski village type morphing town centers) will forever change the character of north lake tahoe communities, further deteriorate accessibility and **widen the inequality for people of lower income levels** whether visitors or residents, as well as threaten environmental and lake quality. **This is a matter of Equality and Accessibility for ALL who want to enjoy the lake**. What lake side resort communities do you know currently that allow 65' or 5 story buildings? There already has been enough built in the 50's in South Lake Tahoe and it is ugly. **Additional density** not only threatens lake quality but it is **a grave concern to local residents when there is the threat of wildfire**. The only egress is on a limited number of 2 lane roads out of the basin, and if more density is allowed than the current 40k ill-informed visitors that may be present on a windy summer day, there would certainly be grave consequences!

Encouragement of REDEVELOPMENT of current properties with incentives to current property owners is one solution, which has been proposed TO **Placer County with NO response**. The Redevelopment Agency of Placer doesn't even exist anymore?? Redevelopment dollars could easily be implemented in this way. Another solution would be for the county to **allocate part of the extensive land parcel bank they own and partner with "affordable housing" developers**, who are willing to work within the current building codes and environmental thresholds to protect the lake. Contribute gratis land for smaller, more sustainable projects (4-6 unit) which would not have to exceed the height restrictions currently in place or change the scenic beauty of the north shore. There is plenty of housing development funding out there which can be used to supplement projects of smaller scale whether new or redevelopment and build communities sustainably, why is it not being utilized? Are the jurisdictions just too lazy to deal with the bureaucratic red tape necessary to implement?

A current cumulative environmental impact report hasn't even been completed since 2017 yet we all are aware of the overtourism, resulting trash, traffic congestion, wildfire evacuation concerns along with the increase in properties purchased for STR (short term rentals) purposes which drove workforce housing availability to its lowest level in the first place! Please insist these governing bodies develop sustainably when planning, reduce STR permits and complete a current Cumulative Environmental Impact Report BEFORE allocating density for housing or changing codes to accommodate profiting developers. The current height allowance of 56' feet (increased from 48' which was proposed by the community in 2017) can be worked within according to local architects. Lowering the available STR permits would only provide more options for the local seasonal workforce again if the STR permit isn't available.

Developing sustainably should be front and center focus on everyone's mind!

The 3 impacts of increased density not in line with developing sustainably -

1. **Lake Quality - Environmental thresholds not being updated, analyzed or even currently upheld (I can forward information about this)**
2. **Inequality - furthering the accessibility gap for workers and visitors to be able to live or visit the Lake Tahoe area**
3. **Wildfire Evacuation - the gravest for residents and visitors alike to be able to evacuate on the limited 2 lane egresses. No roadway by roadway evacuation study has been completed.**

Three alternatives to the proposed height increase (from 56' to 65'), density and 100% coverage (considering no tree screening) in town center development and 60 units per acre outside of town centers:

1. Establish partnerships with workforce housing developers who want to be part of sustainable development in beautiful Lake Tahoe by granting land, waiving development fees, and providing the support to obtain supplemental funding sources.
2. Limit and decrease the number of short term rental permits currently allowed and providing STR owners an alternative incentive program to participate in a seasonal or long term workforce housing program
3. Require completion of a CURRENT Environmental Impact Report and Roadway by Roadway Evacuation Study to understand the impacts that will need mitigating and substantiate this increase in density which seems to be contradictive of what the purpose of the bi-state compact and CEQA guidelines are meant to do - protect the lake its current resident and visitor populations.

Please read the following article recently published in the Nevada Independent which summarizes well what is happening in the eyes of most local residents -

<https://thenevadaindependent.com/article/what-vips-dont-see-all-is-not-well-in-lake-tahoe>

If you have questions or want additional information about any of these impacts, please don't hesitate to ask.

Thanks for your attention and supporting the local community. We feel underrepresented in this matter.

Niobe Burden Austere

(530)320-2100

One of many north shore property owners and a No Lake Tahoe community advocate

From: rondatycer@aol.com <rondatycer@aol.com>
Sent: 9/21/2023 6:30:54 PM
To: Marja Ambler <mambler@trpa.gov>; Public Comment <PublicComment@trpa.gov>
Subject: Fw: 9/19 TRPA Meeting Followup
Attachments: [EpperlyInterview.docx](#) , [STRsReduceAffordableHousing2023.doc](#) , [TycerInputTRPA9-19-23.doc](#)

Dear Marja,

Please distribute to all Governing Board members. Thank you.

Ronda

Dear Karen,

Your Tuesday Power-point presentation on TRPA's amendments for increasing height, density, and allowed coverage in town centers seemed designed to stifle public input by allowing only a written public Q&A at the end of the presentation. I understand that there were over 90 questions submitted. If you intend to answer those, will you be publishing the questions and answers for the public?

For the record, I attach my planned input and also an interview from *California Insider* about the effects of SB9 and SB35 on the California building industry, which may be of interest to you. The interview is with Christine Epperly who is a civil engineer and architectural designer, and has served as a community building expert on the Sebastapol, CA Design Review Board the past 25 years. I think you'll find the interview thought-provoking, as did I. Epperly spotlights the often over-looked psychological effects on residents of living in tiny, dense rental apartments.

As you told me, TRPA does not have to comply with California Regional Housing Needs Allocation (RHNA) code, however TRPA must generate housing policy to accord with RHNA for all basin municipalities in California. It is obvious your current amendments are to align TRPA code with RHNA requirements *not only* on the California side of the basin.

I hope you find the information helpful.

Best always,

Ronda

State-Mandated Housing Coming to Your Town | Christine Christine

A CALIFORNIA INSIDER INTERVIEW with Khorrami Siyamak
And
Christine Epperly:

I'm a structural civil engineer
And architectural designer
Community building expert
On the Sebastapol *Design Review Board* for 25 years

<https://www.theepochtimes.com/epochtv/state-mandated-housing-coming-to-your-town-christine-epperly-5491193?est=4Y9Wfc0BVQDohg7gBTJLNUGbiEYBfco6llFrLmIIKVzd%2BPq58NGJUs4zGTBow%3D%3D>

Views 17.2K •
September-13-2023

● Let's keep in touch: https://bit.ly/YEmail_CAI

Siyamak sits down with Christine Epperly, a licensed civil engineer and building designer with over 30 years in business. She discovered a state-run plan called the "15 Minute City" that is changing the landscape of California. The "15 Minute City" is urbanized, high density, walkable, bikeable rental units.

Christine Epperly - "What's happening in California is we're building these high-density communities in the middle of the towns and suburbs. I looked at them and they're basically all the same. It's brutalism... Living in these small units in high density... it does something to you."

Khorrami

In California today we see all these apartment buildings going up, at the same time they are very high priced, and we're told they're affordable housing. Most of them look like luxury units.

You've seen this happening in your community, which is a very small town in California.

Christine

It's a design review project came before the Design Review Board. This huge project showed up from an out-of-state applicant for 86 units.

Khorrami

So your town has 7500 people. The developer wants to build 86 units.

Christine

So it came before the board. We have what we call “discretionary standards.” It’s on a sloping lot from 0 at the street up to 36 feet. To build they needed a flat lot. So they proposed to cut the back of the lot and put in a huge retaining wall – 16 feet.

One of our standards is “Does it make a smooth transition to the neighboring properties?” We discussed this. And they realized they could go in through the SB35 process. They pulled the project.

SB35 encourages large, high-density housing projects. They promote it as “affordable housing,” but only a maximum of 50% has to be affordable.

“Affordable” means 30% of the median income in your county. In my area, that would make a 2-bedroom apartment rent \$3200-\$3500/month considered “affordable.” In my area the median income is around \$100,000. To be “affordable” what you’re spending on your housing cannot be more than 30% of \$100,000. This is not “low-income” housing. The SB35 projects are 50% affordable and the rest whatever the market will bear. The 50% can’t charge above a certain rent for those. It’s deceptive. It looks like you’ve got this low end, but not everybody is paying that.

I’m from Menlo Park, and I was visiting my dad there and he was showing me the same thing on the El Camino, he had talked to his real estate agent, and he told me that the agent said those were renting out for \$8000/month. What the developer does is designate a certain number of units as affordable to be rented out only at the 30% number. But the rest of the units are whatever he can get. IMO it’s a bit deceptive.

But also what’s happening with these developments is that the developer is getting subsidies. So for our project, when they were still in the design review process, I asked the developer, “Why are you here?” I said, “You’re from Idaho. This is Sebastapol. What are you doing here?”

He was very forthcoming. He said “Quite frankly, because California gives us the most money.” He explained that they get federal money subsidies, state money subsidies, and local money subsidies if they call it “farm-worker housing.” So they called it “farm-worker housing” which set them into having to include “low-income housing” not just “affordable.”

They are subsidized on their build, and the rent for low-income is subsidized by the tax-payer.

Khorrami

So in this process, what you guys were surprised about was... you showed me a map showing the location of this project. There are a lot of single-family homes and a lot of open space, and then all of a sudden there is this proposed big apartment complex kind of in the middle of nowhere?

Christine

So Sebastopol was traditionally mostly apple farming. So the locale was actually a remnant of an old apple farm. There are a few areas in Sebastopol that are within the city jurisdiction that aren't developed. What the State of CA did was go around to all the jurisdictions and said "You have to make this housing element" and "You have to designate areas for high-density." So the City of Sebastopol was forced to designate some locations for high-density, so they found these two lots.

These objective design standards are very big on combining lots so you can do these developments. So they combined the lots, already zoned for high-density, and in they came. *And they used SB35 which means that the local jurisdiction has no say-so whatsoever.*

Khorrami

And is this really common now, that in spite of a lot of the local restrictions, they have to approve this housing?

Christine

Yeah. You have to give them a permit in 90 days. It's crazy. There are a lot of moving parts here, so I'm going to move on to the Objective Design Standards.

What the law says is that you as a developer can do—as long as the design standards are "objective"—they can't be "subjective." So when we had our local standard that said, "There has to be a nice transition between the new development and the adjacent properties," that gave us the leeway to look at the different projects and say, "Yeah, that fits that doesn't." But that was subjective. It has to be objective. It would have had to say, "You cannot have a retaining wall taller than 6'." They took two people from the Design Review Board, one person from Planning, and one City Council member, and they made a subcommittee, and we were to read these Objective Design Standards, which were prepared by a consultant.

My first question when the consultant came in was, "I'd like to see some of the other ones you've done locally...that you've completed the project on." They were hesitant. They said, "You don't need to see that." I said, "Yeah, but I'd really like to." He said, "We did one for Belvedere." Well, that was interesting to me because a good deal of my engineering work was in Belvedere. I know Belvedere. And I looked at the one they were presenting us as a preliminary, and they were the same as the one in Belvedere. I could take a page—flip— and read the same language page by page. And that's what made me start wondering what was going on. So I did a little research, and I found that this company had done 11 in Marin County. Belvedere's in Marin County and I'm one county north of that. And they are basically all the same. There's little nuanced tweaks in the language in a few locations, but basically, they are all the same. That's when I started wondering and asking questions about What is This? We have to adopt this. And they're telling us now that it's only for SB35 and SB9 projects, but I'm thinking, "Here you have this document, what's from keeping the jurisdictions from saying, "Oh, we're just going to adopt this for everything now"?"

So I wanted to know more. I started looking into it more and I saw this language: urbanization, high density, walkable, bikeable. And I thought, I've heard about this before. But what is this really? And I could see that it's definitely a sort of ideology. You take your housing, you inboard, you densify your city. You don't build outside your cities. That's why you're seeing all these apartments.

The concept of the 15-MinuteCity which I thought when I first heard about it was some kind of conspiracy theory, but no, they're serious about this. The idea is that you can do everything you need to do in your life within a 15 minute walk: work, recreate, shop, eat out—everything within 15 minutes.

Khorrani

So essentially they want a lot of apartments or a lot of housing in one area, right?

Christine

Exactly. You can walk to all your amenities within 15 minutes.

Khorrani

And they say this is more affordable. But from what we're hearing, these apartments are a lot more expensive.

Christine

It's interesting because it starts out with "We need more housing and we need more affordable.

Khorrani

This is what it's about because they are forcing the city to develop more.

Christine

This is what they are saying, but, this program doesn't seem to support that. I would say anywhere you have high-density urbanization, it's always more expensive than when you're out in the country. Cities are just more expensive to live in. I think that's the norm.

But it's almost like we have this thing that's being promoted, and then what's really happening.

Khorrani

And in your town, I wouldn't call it a city, it's pretty rural right? And there's a lot of space across the community. There's a lot of farmland that people could develop homes if they wanted to change the zoning. Then people could develop single-family homes, right?

Christine

They are trying to discourage that. That's a big issue. The document that's interesting to read is the Final "RHNA Housing Needs Allocation Plan" (SF Bay Area 2023-2031). The RHNA is the

regional housing needs allotment. That's been around since the 1960s. The California government is trying to predict where are we going to need housing and what kind of housing. But what happened recently is the method includes a lot of things that can't be defined.

The State of California gave the Bay Area a number of housing to be built, and it has to be built within 8 years. The number is 441,000. Then you have a committee that gets together and decides which jurisdiction gets how much of this number. It's divided into Extremely Low Income, Low Income, Moderate Income, and Above Moderate income. Then they have this methodology where they are deciding who gets what.

For example, Belvedere is a town of almost exclusively wealthy people. It's just a little rock in the Bay. So their RHNA number required them to balance by having extremely low income housing, so people can live in Belvedere when they have an extremely low income. The issue with Belvedere is they have no land on which to build anything.

Khorrami

They're already built out?

Christine

Completely.

Khorrami

So they have to tear something down?

Christine

They don't know what they will do. They are trying to use accessory dwelling units (ADUs)

Khorrami

As a means to build new homes

Christine

If you don't meet your RHNA as a jurisdiction, the punishment is horrible. You get all your grant funding pulled. You get referred to the CA Attorney General. You get fined. You have to meet your RHNA number. But it's entirely dependent upon people applying for building permits. How can a jurisdiction control that? In Belvedere for example, the houses are \$8, \$9, \$10, \$20 million—they're hoping they'll build a little ADU in their back yard so they can count that toward the RHNA number. People like that are not particularly motivated. They are not going to rent out an ADU because they don't need to.

Khorrami

Also, wouldn't that create a social problem if you build an ADU on a multi-million dollar home for a family who qualifies for affordable housing. They live there and see these rich people with their nice cars. A their kids growing up see their neighbor kids with all these nice things. Do you think that might create a problem for the low-income families?

Christine

The whole thing is inorganic. It's not following the natural flow of humanity. Because it can depend. The problem I think is here is the density. For example, I do a lot of work where I go on large ranches in the central valley. What I see there is you have the nice house of the ranch owner, and then there will be small houses that the farm workers live in. That seems to work out fine. But if you've got a house in Belvedere, and a tiny space into which to squeeze an ADU... If it were more spread out. If you could allow building outside the urban environment, you're not sharing... But when the wealthy family with a big fancy house and pool and cabana... you have the little granny unit right there [next to it], I do think that will cause problems. On the central valley ranches, there's space around. As a farm worker, you have your own little space with your unit or your house on it.

Khorrami

You have a different perspective on all of this because you often visit Europe as well. You go to Hungary on a regular basis. And they inform you because they have been building apartment units. Essentially, in California now we're building a lot of apartment buildings. If people don't know about it they should know that we are going to have all these apartment buildings. We are planning for a dense living space. And you have an interesting perspective because you go to Hungary in Europe, so can you tell us what they think of that?

Christine

This is interesting. After WWII the housing stock in Hungary was wiped out. The village houses were all bombed out. Then they went behind the Iron Curtain. They had a real housing problem because everyone lost their homes. So they built high-density in the cities and moved everyone in. And over time—it was too harsh on the human spirit—and came to be known as “brutalism.” Now when you go to Hungary, the remnants of this high-density is where only the very poorest people live. They're now trying to move people back out into the villages. They are rebuilding the villages. So it's the opposite of what we're doing now.

It's interesting to go to Hungary because the Hungarian people have always looked to California as a beacon, like, we all want to go there. Now they're looking at the youtube videos and seeing all the problems with the homeless and crime and everything, and they're asking me, “What are you doing? Why are you letting this happen?” They'll say to me, “This is our hope. You are our shining light. If the light goes out, we have no hope.” You need to have something to aspire to.

Khorrami

Why do they call it “brutalism to have people living in these apartment buildings?”

Christine

Living in small units in high density and not going very far from their houses, that happens in Hungary because they don't have any personal transportation. And part of this RHNA program is trying to take that away. It does something to you. Your world becomes much smaller. You lose confidence. You have a low self-image. It's brutalism.

We have a program where we take inner-city kids to a ranch in Wyoming. They've usually never been more than a few blocks from their home. We take them out there. They have experiences with horses, they're in the outdoors, they're riding, going fly-fishing, and having cookouts. What we found with these kids is, when they first come, they have no confidence. They're defensive and afraid. When you give them a couple of weeks out there with the horses, the fishing, and the hiking, they change. So this is brutalism. But right now, it's the trend here. I'm probably one of the few people in my town who would say this. You'd get run out of town.

Khorrami

So essentially what California is doing—which in your town, I saw the pictures—doesn't really make sense. They are building in the middle of ranches and homes with big back yards. What's happening in California is that we're building these communities in the middle of towns and suburbs, which you are saying is not going to get those people out of the communities anyway. Because they are living in this confined space.

Christine

So this is the other aspect of this program. What they want to do... Make sure you don't provide enough parking. So this development we're getting... First of all the road narrows down so there's no possibility for street parking in the proximity of the units. They have 1.7 parking places per unit. That includes the disabled parking and the car-charging parking spots which you can't use.

The idea is that these people will give up on the idea of having a car. The plan for the Bay Area is that we have delineated all these transit corridors and everyone is going to take buses. But Sebastapol is out in the middle of nowhere. You have to have a car. They think you'll walk into town to go to the grocery store. But there are so many things that are not in Sebastapol or in a small town that you have to drive to go do, that these cars are going to be there. If you talk to a normal modern family, the husband has a car, the wife has a car, and if you have kids old enough, they have cars. They have to. But there's nowhere for them to park. But this is a program to force you to walk away from your car.

The people making these decisions are ideologues. They see this situation where everybody car-shares or walks and we save the planet from CO2. But it's not real.

Khorrami

They're also trying to help these people by bringing these low-income residents into the communities that are affluent, right?

Christine

This is part of the program. They've delineated the areas that they say are "under-privileged" and ranked your RHNA number, so that if you don't have people in low-income housing in your area, it needs to be balanced by bringing those in. That's reflected in the RHNA number.

This project that's coming to our town is a RHNA-number-driven project. We *have* to develop a certain number of these units.

Khorrami

So are they going to bring people from out of town to these units, or will the residents be people who are already in the town? So it seems like the population is growing... or how does this really work?

Christine

This particular project has to be "farm workers." So, where are the farms? We have a lot of vineyards. But the thing about vineyards is that they are really only labor-intensive for a brief time during pruning and picking. What vineyards typically do is contract out to companies that have crews that they bring around and do the work when the work is needed. I can't imagine there are all these "low-income farm workers." They may be in the central valley. So I don't know where they are going to come from. They aren't locals.

Khorrami

So they have to drive further to get to these buildings?

Christine

For sure with the location of this building, nobody is walking to work in 15 minutes. And there is no public transit to take them anywhere, so they have to drive. This is one of the things we were discussing when it was still under the purview of the Design Review Board. We were asking them about this. They kept saying "State law says we only have to put in this much parking, so that's what we're doing." There was a time not that long ago when we could have done something about it. But now we can't. And this all happened at the same time. We had these initial meetings where we were commenting on the project. Then we got shut off because it was an SB35 project and we no longer had any control.

What ended up happening for these people—I felt sorry for them—the public comment on this was during COVID with everyone on Zoom. These poor people who aren't technically sophisticated spend half of their allotted 3 minutes saying "Can you hear me?" "Can you see me?" "Do I have this on right?" And they have only a few minutes for this really critical input and they're just cut off. But at least they had a chance before it moved into SB35. And the attitude was, "Well you're living next to an area zoned for high-density, so you should expect it." It's just a difficult situation.

Khorrami

There's another side to this that says people are trying to solve the affordability problem. They want to make housing more affordable and these units will cost less to make.

Christine

They are saying it's unaffordable now because there aren't enough units. So if you make a whole bunch more units, it will drive the cost down. But that's actually not the case.

What's happening in construction in California... Actually the material aspect of this is everywhere. When the lockdowns happened, the producers of construction materials didn't know what was going to happen, so they shut down their operations, resulting in a huge shortage of materials. Interestingly, construction did not go down. When the lockdowns happened, I thought maybe everything would slow down including construction, but it did not. So it peaked the prices of everything—your concrete, your rebar ties, your form-boards. Everything is 3-4 times more than what it was before COVID. And now the prices are not going back down. This is now the new established price.

So you're looking at building the most basic unit at \$600/sq ft. So for example, I live in a 1200 square foot house, and if I had to rebuild it because of fire or something else happened, that would cost \$720,000. When I talk about \$600/sq ft I'm talking about your most minimal materials that probably won't be durable. My contractors are telling me, "Oh, no, you've got to move up to \$800-\$1000/sq ft. These are fixed costs. I don't care whether you're building an SB35 project or you're building a nice house. Those costs are fixed.

Khorrami

...whether you're building a multi-unit or a single unit?

Christine

A multi-unit building you'll get some break because of the size. But lo and behold, what are we finding out? We hear about these apartments for the homeless in Venice Beach. It's \$700,000 per unit. And I'm thinking, "Yeah, it is!" And the other aspect that is driving up the cost is the labor. What my contractors are telling me is ever since the COVID lockdown, they can't get the good workers. They're having to pay a lot more money for a lot less production. So the labor costs have gone way up. You combine that with the materials cost, and you're looking at these fixed numbers. You can talk about building however many units you want, but they are each still going to cost that. So I don't see RHNA driving the cost down at all.

Khorrami

So we're building these multiunit complexes in suburbs, forcing the development. The state wants to do this because they want to lower the cost of housing, they also want to achieve climate initiatives so don't want people to drive. But from what it looks like, it might not do much about the costs. And it might not have an impact on driving because a lot of people are in non-urban areas. Right?

Christine

It's ridiculous. When you're looking at the cost, there are all these state mandates that are driving it up. All my contractors know exactly what I'm talking about. You can't use gas appliances anymore so now you have to use these E-pump units. That's another project cost. Then you have your energy requirements for insulation and lighting and everything. It's so onerous. And they just passed a new code in California that made it even worse. You add all these things up, and it becomes unaffordable.

What's interesting to me is that construction continues. There's no shortage of work if you're in the building industry. But the prices are astronomical.

Khorrami

So you don't think you're building "affordable" housing?

Christine

It's not affordable housing. They're saying that, "If you build enough units, the price will go down." That's the thinking, but that's not what's happening. It still costs that much to build those units. They still have to sell for the price point based on the cost. We're not looking at what's making them costly. The cost is not because there aren't enough units. That's not the reason. I can tell you that for sure. Because landlord/tenant laws in California are so onerous that we currently have a massive amount of unrented units available right now.

I had a conversation with a lady who ran for mayor of San Francisco. She was involved with the Chinese community. She told me there are 40,000 unrented units in San Francisco. If they rent it out, they're worried they won't be able to get the tenant out. The laws favor the tenants.

Khorrami

So they're renting and the price goes up and they don't want...

Christine

Well the units are there. But now they want to build more units. And we've got the cost of the new units. So if we could rent out the existing empty units, then you can go back to a more affordable price because you don't have to pay to build them. When you build new units, you have to pay to build them at the new costs I'm describing. And these costs are fixed costs. You can't make them go away unless the prices of everything start going down. I don't see that happening.

So in a way it's not well thought out. But in addition to that, there is this underlying agenda. That is what is called "form-based code." That's what these objective design standards are. It's a new way to look at how you're going to plan your community.

They're trying to not have big boxy buildings. Rather if an area is built out for apartments, you have smaller buildings with roads or paths going between the buildings so it doesn't look like one giant building.

The consultant we have keeps talking about this. We can combine lots and make this like a little community within the community. You'll have roads going through and some little houses and all this. Combining lots into one lot and building all these units still has only one owner. We're talking rentals. We're not talking individual home ownership. If you have a townhouse project, each townhouse becomes its own separate property. So one individual can go in there and buy

it. The greatest way in this country for your average person to gain some wealth is to own a property. And these are where people start. They start with a townhouse and get a little equity, their job will get better, they'll move to the single family dwelling.

But what they're planning here is a rental society. All the apartments you see going up are all rentals. This form-based code is all rentals. You're creating a rental society. That's very different from a society where everybody has a stake in it. And nobody is talking about this.

40:18

Khorrami

Christine, do you have any recommendations for California?

Christine

I do. Don't take everything you're being told about and just accept it. Think about it with your own mind. Do research. Look into it. The amount of information I found just by going on Google is incredible. Don't accept just what you're being told. People are busy, so they tend to.

And get involved in your city. I'm only here because I volunteered to be on this Board. Find ways to get involved in your community. Go on boards, join the school board. the design review board, run for city council. Get in there and say something. Because all this stuff is happening and you don't even know about it.

Khorrami

So Christine. What should you tell those state leaders? It's not easy. The housing costs have gone up significantly. And you're trying to solve this by pushing communities to develop these high-density housing. What would you recommend to them?

Christine

First of all, they have to find a way to listen to the people who are actually engaged with the industry and not just using ideological ideas that sound nice. Those are the people who really know what's happening. As far as the cost of construction, you're going to have to talk to the people who are actually building the buildings, and find out what's going on with them and what they think about what's happening. They'll tell you about their problems with their trucks which they had to convert from diesel. That cost a huge amount of money that got passed on. You have all these new energy standards... but we live in a really nice environment. Do we really need the big amount of insulation? What's that costing people? And Listen to the people. I don't know how you get to that point. People who are actually doing the stuff—building buildings and transporting the materials—they're busy working. They're not available to come to the planning meetings. They don't come to them. The people who come to the planning meetings are the ones with these nice ideas. They have a little bit more time. Maybe they're not working so much. And the ideas sound good. "Let's bring everybody into the city so we can protect the environment outside the city." That's an idea. But is it practical or reasonable?

I'd give our leaders the same advice I give to the people. Don't just take these ideas. Think them through. Drill down on them. Ask yourself questions. "Why is this working like this?" "Does this work?" "Will this work?" What are other options? Listen to people who have other options. Don't shut them down. People with different viewpoints are getting shut down and not allowed to speak.

We have a huge number of houses that were built in the 50s, 60, and 70s that are at the end of their lifespan because people can't afford to make the repairs that are needed at this point. Let's find a way to encourage that. Have a program to help those people out. Encourage home ownership. They're now going the opposite direction.

I think if people can find a way to get in and own the home, they'll have pride, they'll have their foot in the door (financially), they'll feel they have something of value. When you're creating a society of renters, that's not going to happen. There's no way that's going to happen. This is what happened with the "pack-and-stack" in Central Europe. They were all owned by the government, and people were renting. There was no motivation to fix them up. Why would there be? Who's going to do it? The person who owns property does that. They are motivated to do that because they have a stake in it.

Khorrani

Do you have any final thoughts for our audience?

Christine

California is a great state. There are just awesome people here. But let's just start talking about it. Don't be afraid to talk about it. Don't let yourself get shut down. With all the incredibly wonderful people who are here, we can save this state. So just start talking about it to everybody—grocery store clerks, people in store lines, wherever you go. Just start talking and don't get shut down.... We are a great people here—the best in the world, in my opinion.

Khorrani

Christine Epperly—civil engineer and building designer—it was great to have you on California Insider.

Christine

Thank you very much. It was my honor.

Affordable Housing and the Impact of Short-Term Rentals

December 30, 2021 by [Steve Butler](#)

Category: [Housing](#), [Tourism](#)

<https://mrsc.org/stay-informed/mrsc-insight/december-2021/affordable-housing-and-the-impact-of-short-term-re>

Short-term rentals (STRs), sometimes also referred to as “Home Sharing,” are very popular with travelers. They are viewed as a way for visitors to temporarily feel part of a local neighborhood rather than staying in a hotel or motel situated in a commercial area.

Short-term rentals have been in existence for several decades but widespread usage of them exploded with the advent of online platforms such as Airbnb and VRBO. The market took a major hit during the early days of the COVID-19 pandemic, but its popularity has been rising now that more people are traveling again.

With the ever-increasing popularity of STRs, however, has come unanticipated and unwanted problems, particularly for residential neighbors living close to them. Negative impacts caused by some short-term rental visitors include excessive noise, after-hours partying, and parking conflicts, to name just a few of the major ones. In response, several communities have adopted regulations to address those negative impacts (for more details, see my blogs: [12 Examples of Short-Term Vacation Rental Regulations](#); [Local Government Catching Up with Airbnb and Other Short-Term Transient Rental Businesses](#)).

One major item that has recently been facing increasing local government scrutiny, however, is the impact that STRs have on the supply of affordable housing. The worry is not about a homeowner renting out a room or two to help with monthly mortgage payments. Instead, there is a concern that investors will purchase existing residential units and rent them out on a short-term basis to out-of-town visitors, thereby taking those units out of the long-term rental housing market.

STRs Effect on the Local Affordable Housing Supply

While not the primary cause of affordable housing problems, many experts believe that STRs do have a negative impact on affordable housing at the local level, especially in high-tourism communities. Several organizations, such as The Pew Charitable Trusts and the Harvard Business Review (HBR), have conducted or published research showing that as the number of short-term rentals increase in a community, the quantity of affordable housing units decrease.

The authors of a [2019 HBR article](#) focusing on the effects of Airbnb observed that, “because of Airbnb, absentee landlords are moving their properties out of the long-term rental and for-sale markets and into the short-term rental market.” The authors noted that as *absentee* landlords reduce the housing supply, it increases the housing cost for local renters:

(I)n aggregate, the growth in home-sharing through Airbnb contributes to about one-fifth [or 20%] of the average annual increase in U.S. rents and about one-seventh [or 14%] of the average annual increase in U.S. housing prices.

But what about *non-absentee* property owners using online platforms like Airbnb to rent out their properties, you might ask? The HBR researchers found that “owner-occupiers” who rent out their spare rooms or even an entire house (when they are away for a set period of time) to short-term visitors using a virtual house-sharing platform do not impact the long-term rental market.

Regulations That Address STRs and Affordable Housing Concerns

Affordable housing impacts caused by the conversion of long-term housing to short-term rental use are such a concern that it is becoming a major rationale for regulating STRs, with one U.S. community — the ski resort town of [Aspen \(CO\)](#) — taking the dramatic step of enacting a one-year STR moratorium.

While not going so far as Aspen, several Washington State cities have adopted plans and STR regulations that explicitly identify the impact on affordable housing as a major policy rationale. Examples include:

- [Chelan County Municipal Code Sec. 11.88.290\(C\)](#) — This section on short-term rentals references affordable housing as one reason for regulation.
- [Kirkland Ordinance 4607](#) — Cites housing affordability in the third ‘whereas.’
- [Olympia Housing Action Plan](#) — Strategy 2b states: “Adopt short-term rental regulations to minimize impacts on long-term housing availability.”
- [Walla Walla Municipal Code Sec. 20.139.010\(B\)](#) — The purpose statement in the short-term rentals section cites regulation of STRs as “necessary to provide adequate housing opportunities to low- and moderate-income persons.”

In addition to having a clear affordable housing policy statement, Chelan County has recently updated its [STR regulations](#) to provide more flexibility for owner-occupied units. These are categorized as “Tier 1” rentals and must meet one of the following characteristics:

1. Is a room in a dwelling in which the owner is personally present during the rental period;
2. Is a unit located on the same parcel as the owner’s principal residence and the owner is personally present during the rental period, or;
3. Is the entire dwelling, which is rented for no more than 15 total days in a calendar year provided that an on-site qualified person is there during the owner’s absence.

STRs that don’t meet one of these three Tier 1 criteria are categorized as Tier 2 or Tier 3 and are more strictly regulated by the county, in large part due to affordable housing concerns. In fact, the Chelan County code requires that new short-term rentals deemed to be Tier 2 and/or Tier 3 “cannot be located in specified areas where short-term rentals make up more than the maximum share of the total housing stock in [those specifically identified] residential zoning districts...” For most of the specified areas in Chelan County, the maximum share is 6%, with two exceptions being the Manson urban growth area (UGA) at 9% and the Peshastin UGA at 0%.

Conclusion and Additional Resources

There may be many reasons behind a local government’s decision to regulate or not regulate the local STR market. On the one hand, mitigating the negative impacts of ill-behaved visitors on local residents may prompt a jurisdiction to adopt STR regulations. Conversely, allowing property owners to rent out an extra room, which may make it easier for them to pay their mortgage, is sometimes the reason why restrictions on STRs are more limited or nonexistent in some communities.

For those communities wrestling with a tight housing supply and a strong tourist/visitor market, however, affordable housing is another significant policy factor to weigh when a local government is considering how strictly to regulate short-term rentals.

For more information on how STRs impact the local housing market and what some cities and counties have done to regulate them, here are additional resources:

- [When Airbnb Listings in a City Increase, So Do Rent Prices](#) — Harvard Business Review
- [A Practical Guide to Effectively Regulating Short-Term Rentals on the Local Government Level](#) — Prepared for the City of Santa Cruz (CA) by Ulrik Binzer, Host Compliance LLC
- [Cities Tell Airbnb to Make Room for Affordable Housing](#) — Stateline, Pew Charitable Trusts
- [The Airbnb Effect on Housing Markets and Rent](#) — Forbes

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About Steve Butler

Steve joined MRSC in February 2015. He has been involved in most aspects of community planning for over 30 years, both in the public and private sectors. He received a B.A. from St. Lawrence University (Canton, New York) and a M.S. in Urban and Regional Planning from the University of Wisconsin-Madison. Steve has served as president of statewide planning associations in both Washington and Maine, and was elected to the American Institute of Certified Planner's College of Fellows in 2008.

[VIEW ALL POSTS BY STEVE BUTLER](#)

Unbeknownst to most, TRPA's affordable housing code changes are a response to California's carrot-and-stick agenda—the Regional Housing Needs Allocation (RHNA). This legislation requires every California city and county to build housing affordable to all income earners. TRPA must generate housing policy in accord with RHNA for all Tahoe Basin municipalities in California.

The 2016 RHNA forces municipalities to build affordable housing. If municipalities don't meet their quota, they don't qualify for state grants and other funding. The carrot with the stick is that California provides significant subsidies for building these units (more than any other state), and specific subsidies are also available from the federal government (e.g., "farm-worker housing"), and from local governments (e.g., "low-income" housing). These "subsidies" come from the taxpayers.

Unfortunately, ***TRPA's proposed changes to height, density, and coverage won't solve the problem of housing affordability in the Tahoe Basin for several reasons.***

1 - The **first** is that the RHNA building mandate only requires a minimal percentage of units in each development to be "affordable." The rest can be at market rate.

Affordable means 30% of the median annual income in the county. For example, in Placer County the AMI = \$64,100 for a 2-person family; \$80,100 for a 4 person family. So "affordable housing" would be in the range from 30% of 64100 = \$19,230 to 30% of 80100 = \$24,030. Dividing these totals by 12 months results in rent or home payments of \$1603 to \$2003 per month. ***Such payments will not buy or rent new housing in the Tahoe Basin today.*** (<https://www.placer.ca.gov/DocumentCenter/View/36060/AMI>).

2 - The **second** is that in our post-pandemic reality, the construction industry raw materials and labor have risen so much that even modest deed-restricted newly built units will have fixed building costs that make them "unaffordable."

Estimates of per unit costs have increased since your consultants put together their presentation in 2021-22. Fixed costs for materials and labor are now a "bare-bones" \$600/sq ft to a "standard" \$800/sq ft. Fixed costs for a 2 bedroom-2 bath 1200 sq ft unit will be between \$720,000 and \$960,000. ***Fixed construction costs will not translate into "affordable"*** without government subsidies, which simply transfer the cost from those who benefit to those who don't.

A more promising approach is to fully utilize the current housing stock to avoid having to pay the current unaffordable high price of new development. Redevelopment saves land costs. Remodels—even adhering to new codes and putting in proper BMPs—save materials. Hence, today's remodels will be more environmentally friendly than today's new construction.

3- The **third** is that when you tweak the definition of "affordable" to include "achievable" to lure developers, you ensure that ***most basin employees will be left out.*** Yes, middle- and upper-management professionals can find housing, but again the employees in Tahoe's major employee categories can't.

4 - Another huge factor affecting housing costs—now being recognized and discussed even by national political candidates—is that ***large investment groups such as Blackrock have purchased hundreds of thousands of houses throughout the US, easily outbidding the average homebuyer for every purchase and running up costs.*** According to data reviewed by [Stateline](#), corporate investors purchased 28% of all single-family-homes in 2022. The huge increases in rental costs in the basin over the past 3 years are in no small part

due to these institutional investors buying up existing housing stock to use as rentals. When more than a quarter of homes are bought at top dollar to rent out—effectively raising prices beyond reach of average Americans—all the psychological benefits of home ownership (pride of ownership, motivation to maintain and improve possessions, financial opportunity based on ownership, commitment to neighborhoods and communities, etc.) are sacrificed.

So yes, new TRPA policies for basin housing are critically needed. But until TRPA promotes policies that prevent trillion-dollar investment firms from buying up homes for short-or long-term rentals (see attached), TRPA code changes in height, density, and coverage will do little to help the basin's affordable-housing crisis.

I hope these comments are helpful.

Ronda Tycer, PhD
Incline Resident

From: Patrick Taylor <patrick@ALPINE-CORP.COM>
Sent: 9/21/2023 5:55:08 PM
To: Karen Fink <kfink@trpa.gov>
Cc: Public Comment <PublicComment@trpa.gov>;
Subject: RE: RPIC packet posted
Attachments: [image002.jpg](#), [image003.jpg](#)

Hi Karen,

I attended the webinar on Tuesday September 19th and have the following comments and solutions. The code that requires excess land coverage to be purchased and transferred to a deed restricted workforce housing project should be repealed. This code disincentivizes developers to build deed restricted work force housing. The costs to build this type of housing is already extremely high and makes the Tahoe basin an undesirable place to build this type of housing which is one of the reasons why there's a drastic shortage of workforce housing.

It doesn't make any sense that developers paying money is going to help the environment according to the EIR which is apparently the reason this was taken out the proposed code changes. All it does is disincentivize developers from building this housing. The solution is to change that code and do anything TRPA can do to bring the costs down to develop workforce housing.

The map that was presented during the webinar showing the orange areas outside of town centers that small lots are being encouraged to be developed with duplexes, triplexes, and four plex's is a great place to develop the work force housing although not these type units. The cost of the land is too high to make building these types of units financially feasible.


The solution is to change the code to remove all density, parking, and height restrictions on these small lots. That will incentivize development of these small parcels and allow as many units as possible to be built on these parcels which is a win-win for everyone.

It's critical that TRPA be focused on code changes that allow more density, land coverage, height, and no parking requirements on parcels currently zoned Multifamily outside of town centers. That will help solve the problem that developers face which is how do we make this project financially feasible and keep the rents low or sales prices achievable.

I've lived in Lake Tahoe for 35 years and my company is doing everything we can to build as many work force housing units around the lake as possible. We and other developers can't do it without help from TRPA and other agencies as well as municipalities.

Sincerely,

Patrick Taylor
CFO
PO Box 11224
Zephyr Cove, NV 89448
e. patrick@alpine-corp.com
o: 775-588-7824
m. 775-830-9994


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From: Karen Fink <kfink@trpa.gov>
Sent: Thursday, September 21, 2023 12:49 PM
To: Patrick Taylor <patrick@ALPINE-CORP.COM>
Subject: RE: RPIC packet posted

Hi Patrick – feel free to send any comments. If you want the board to see them, please cc: publiccomment@trpa.gov. At this point we can't make any more changes to the packet so if there is anything in there you think should be changed, please send a public comment or make a comment at the meeting. The comments regarding the 25% density bonus for achievable are posted, and in fact the current proposal proposes to lift the density cap in multi-family areas as well as in town centers.

Karen Fink, AICP
Housing and Community Revitalization Program Manager
Office: 775-589-5258
kfink@trpa.gov



From: Patrick Taylor <patrick@ALPINE-CORP.COM>
Sent: Thursday, September 21, 2023 12:39 PM
To: Karen Fink <kfink@trpa.gov>
Subject: Re: RPIC packet posted

Hi Karen,

I've got a few comments about the webinar should I send them to you? Hopefully, you can use them for your RPIC packet and include them in your proposed code changes.

One of things I noticed during the webinar is there seemed to be a lot of people that answered NO to the questions, I've noticed this at most of the housing meetings I've attended, do any of these people offer any solutions to our workforce housing crisis?
I feel like this question should be asked to all of them in the public meeting to prove the point that they don't have any solutions they're simply complaining.

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From: Karen Fink <kfink@trpa.gov>
Sent: Thursday, September 21, 2023 11:15:58 AM
To: Patrick Taylor <patrick@ALPINE-CORP.COM>
Subject: RPIC packet posted

Hi Patrick
We got your comments and posted them. The RPIC packet is posted here: <https://www.trpa.gov/wp-content/uploads/RPIC-Agenda-Item-No-3-Housing-Amendments.pdf>

Karen Fink, AICP
Housing and Community Revitalization Program Manager
Office: 775-589-5258
kfink@trpa.gov



From: Marja Ambler <mambler@trpa.gov>
Sent: 9/20/2023 12:01:56 PM
To: leah kaufman <leah.lkplanning@sbcglobal.net>
Cc: Niobe Burden <niobe.burden@gmail.com>; Public Comment <PublicComment@trpa.gov>;
Subject: RE: Sustainable housing allocation /development in a sensitive environment
Attachments: [image001.jpg](#)

Thank you for your email. Please send or copy all future public comments to publiccomment@trpa.gov.

Marja Ambler
Executive Assistant
775-589-5287



From: leah kaufman <leah.lkplanning@sbcglobal.net>
Sent: Wednesday, September 20, 2023 12:00 PM
To: Marja Ambler <mambler@trpa.gov>
Cc: Niobe Burden <niobe.burden@gmail.com>
Subject: Fw: Sustainable housing allocation /development in a sensitive environment

Please distribute for Sept RPIC

Niobe

Please acknowledge receipt and distribute to make aware, with discussion as deemed necessary

To whom it may concern -

Please take note and work with the governing jurisdictions (TRPA, Placer and Eldorado Counties) of north lake Tahoe communities of Tahoe City, Tahoe Vista, Homewood, Tahoma, Sunnyside and Kings Beach to find creative solutions for "affordable housing". In local government jurisdiction response to CA SB9, the **current "achievable housing" proposed** solutions are not achievable for the current workforce, except the Bay area remote tech workers who can obtain a business license and afford a "deed restricted" unit . There is no income cap on the guidelines and it is **NOT addressing the real problem of service workers not being able to RENT something affordable**. Why would a "missing middle" local family live in a condominium without a yard for their kids when they can live in a house in Reno. The remaining "missing middle" that I've spoken to whom I work with in the Tahoe Forest Hospital District can't afford to purchase any of these proposed "deed restricted achievable" housing units.

One of the largest obstacles to building "affordable" housing in the Tahoe Truckee area is the **substantial costs involved building within an environmentally sensitive environment and meeting thresholds for protection of Lake Tahoe**. Therefore, proposed projects do not "pencil" without additional density and alternatively they want to encourage projects with more density and proposed "deed restricted, achievable housing". Parking is also not being planned realistically. Rather they propose to allow more coverage/density, and leave it up to the developer but let us not digress. This is very different than "affordable housing " but it satisfies most developers for profitability. Local jurisdictions including Placer County and the Tahoe Regional Planning Agency (TRPA) **are proposing increased coverage/density with additional building height up to 65 feet in the name of "achievable, deed restricted" housing**. These proposed projects (ski village type morphing town centers) will forever change the character of north lake tahoe communities, further deteriorate accessibility and **widen the inequality for people of lower income levels** whether visitors or residents, as well as threaten environmental and lake quality. **This is a matter of Equality and Accessibility for ALL who want to enjoy the lake**. What lake side resort communities do you know currently that allow 65' or 5 story buildings? There already has been enough built in the 50's in South Lake Tahoe and it is ugly. **Additional density** not only threatens lake quality but **it is a grave concern to local residents when there is the threat of wildfire**. The only egress is on a limited number of 2 lane roads out of the basin, and if more density is allowed than the current 40k ill-informed visitors that may be present on a windy summer day, there would certainly be grave consequences!

Encouragement of REDEVELOPMENT of current properties with incentives to current property owners is one solution, which has been proposed TO **Placer County with NO response**. The Redevelopment Agency of Placer doesn't even exist anymore?? Redevelopment dollars could easily be implemented in this way. Another solution would be for the county to **allocate part of the extensive land parcel bank they own and partner with "affordable housing" developers**, who are willing to work within the current building codes and environmental thresholds to protect the lake. Contribute gratis land for smaller, more sustainable projects (4-6 unit) which would not have to exceed the height restrictions currently in place or change the scenic beauty of the north shore. There is plenty of housing development funding out there which can be used to supplement projects of smaller scale whether new or redevelopment and build communities sustainably, why is it not being utilized? Are the jurisdictions just too lazy to deal with the bureaucratic red tape necessary to implement?

A current cumulative environmental impact report hasn't even been completed since 2017 yet we all are aware of the overtourism, resulting trash, traffic congestion, wildfire evacuation concerns along with the increase in properties purchased for STR (short term rentals) purposes which drove workforce housing

availability to its lowest level in the first place! Please insist these governing bodies develop sustainably when planning, reduce STR permits and complete a current Cumulative Environmental Impact Report BEFORE allocating density for housing or changing codes to accommodate profiting developers. The current height allowance of 56' feet (increased from 48' which was proposed by the community in 2017) can be worked within according to local architects. Lowering the available STR permits would only provide more options for the local seasonal workforce again if the STR permit isn't available.

Developing sustainably should be front and center focus on everyone's mind!

The 3 impacts of increased density not in line with developing sustainably -

1. **Lake Quality - Environmental thresholds not being updated, analyzed or even currently upheld (I can forward information about this)**
2. **Inequality - furthering the accessibility gap for workers and visitors to be able to live or visit the Lake Tahoe area**
3. **Wildfire Evacuation - the gravest for residents and visitors alike to be able to evacuate on the limited 2 lane egresses. No roadway by roadway evacuation study has been completed.**

Three alternatives to the proposed height increase (from 56' to 65'), density and 100% coverage (considering no tree screening) in town center development and 60 units per acre outside of town centers:

1. **Establish partnerships with workforce housing developers who want to be part of sustainable development in beautiful Lake Tahoe by granting land, waiving development fees, and providing the support to obtain supplemental funding sources.**
2. **Limit and decrease the number of short term rental permits currently allowed and providing STR owners an alternative incentive program to participate in a seasonal or long term workforce housing program**
3. **Require completion of a CURRENT Environmental Impact Report and Roadway by Roadway Evacuation Study to understand the impacts that will need mitigating and substantiate this increase in density which seems to be contradictive of what the purpose of the bi-state compact and CEQA guidelines are meant to do - protect the lake its current resident and visitor populations.**

Please read the following article recently published in the Nevada Independent which summarizes well what is happening in the eyes of most local residents -

<https://thenevadaindependent.com/article/what-vips-dont-see-all-is-not-well-in-lake-tahoe>

If you have questions or want additional information about any of these impacts, please don't hesitate to ask.

Thanks for your attention and supporting the local community. We feel underrepresented in this matter.

Niobe Burden Austere

(530)320-2100

One of many north shore property owners and a No Lake Tahoe community advocate



**TAHOE
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PLANNING
AGENCY**

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From: Karen Fink <kfink@trpa.gov>
Sent: 9/14/2023 2:02:52 PM
To: Andrea Gonzalez <andrea@exlineandcompany.com>; Exline & Company Inc <nick@exlineandcompany.com>; Public Comment <PublicComment@trpa.gov>
Subject: FW: Achievable Housing Density Bonus Support Letter
Attachments: [TRPA Density Support Letter.pdf](#) , [image001.jpg](#)

Dear Andrea and Nick,
Thank you for submitting this letter. I have copied our new Public Comment e-mail address. Please send or copy all future public comments to publiccomment@trpa.gov.

Thanks, have a great day!

Karen Fink, AICP
Housing and Community Revitalization Program Manager
Office: 775-589-5258
kfink@trpa.gov



From: Andrea Gonzalez <andrea@exlineandcompany.com>
Sent: Thursday, September 14, 2023 11:51 AM
To: Karen Fink <kfink@trpa.gov>
Cc: Nick Exline <nick@exlineandcompany.com>
Subject: Achievable Housing Density Bonus Support Letter

Hi Karen,

I hope you are having a great week.

Please see our attached housing density support letter where we write to support the expansion of density bonus options for all deed restricted housing options. We have been engaged with Patrick Taylor in order to best provide support to bring these decisions forward.

Please feel free to reach out with any questions or if you would like to discuss further.

Thank you,

--
Andrea Gonzalez
Assistant Planner II
Mobile 760-575-0356

Exline & Company Inc.
P O Box 16789
South Lake Tahoe, CA 96151
www.exlineandcompany.com





September 14, 2023

Attn: Karen Fink,
Housing and Community Revitalization Program Manager

Tahoe Regional Planning Agency
P.O Box 5310
Stateline, NV 89449

RE: Achievable Housing Density Bonus Support Letter

Dear Ms. Fink,

This letter is being provided to outline the importance of allowing deed restricted achievable housing to utilize TRPA density bonus options available to other deed restricted housing types. The Tahoe community and our elected officials support the implementation of increased density bonus options for all levels of deed restricted housing, including achievable housing. With the limitations of density brought forth within different zoning and area plan statements, the need for housing density bonus options continues to increase around the Tahoe Basin. To allow any level of deed restricted housing to utilize density bonuses eases the challenges associated with the development of affordable and achievable housing units. These housing projects should be more inclusive in order to incentivize private developers to lend their helping hand in providing deed restricted housing options.

There are planning considerations and special designations already existing in various governing planning documents that have been put in place to incentivize deed restricted housing. However, these considerations and designations are not enough to truly bring forward an array of deed restricted housing options. Without the essential piece of housing amendment packages currently being considered by TRPA, moving forward the development of deed restricted housing will be difficult to achieve. The amendment package does not go far enough because it does not allow for deed restricted achievable housing to utilize the density bonus option. Allowing achievable housing to utilize the density bonus option is paramount to bringing forward additional housing units for our community. Alpine Estates is currently in preliminary permitting process with the City of South Lake Tahoe and TRPA, located near the "Y" intersection of Lake Tahoe Blvd to develop deed restricted achievable housing. Significant progress has been made in ensuring additional units are included with the incentives provided within the Tahoe Valley Area Plan. However, not all town centers around the basin offer such incentives for achievable multi-family housing.

Our team at Exline and Company enjoys working with developers proposing deed restricted housing options around the basin. However, developers face different challenges when seeking potential project areas including density. As an active company around the basin that fully supports deed restricted housing options, Exline & Company fully supports the expansion of density bonus options for all deed

restricted housing types including achievable housing. We are pleased to work with you, the community and stakeholders to bring forward deed restricted housing.

Thank you for your time and consideration.

Sincerely,

Nicholas Exline

Nicholas Exline
Principal Planner, AICP

Andrea Gonzalez

Andrea Gonzalez
Assistant Planner II

From: Sandy <sandy@ALPINE-CORP.COM>
Sent: 9/11/2023 12:29:27 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: In favor for code changes for Achievable Housing
Attachments: [image001.jpg](#)

Hello,

The new code changes proposed for deed-restricted achievable housing should allow the same 25% density bonus for achievable housing that applies to the existing code for affordable housing. This change should apply to both town centers and non-town centers.

Thank you,

Sandy Sobas
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