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STAFF REPORT

Date: November 12, 2025

To: TRPA Regional Planning Committee

From: TRPA Staff

Subject: Presentation on the Placer County Individual Parcel Evaluation System (IPES) Buildable Line

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Summary:
TRPA's growth management system includes three primary elements: (1) Limits on total development; (2) Limits on the pace of development; and (3) Limits on the location of development. The IPES framework helps direct residential development to the most suitable locations. Like the biannual distribution of residential allocations, which the agency uses to meter the pace of development, the IPES system includes a periodic review to ensure that environmental progress is being made before opening new parcels for development. This process can result in lowering the minimum score, or IPES line, needed for a parcel to be considered for development. Pursuant to the review required by Chapter 53 of the Code of Ordinances, staff recommends that the Regional Planning Committee recommend that the Placer County IPES line be lowered from 726 to 702 at the December 2025 Governing Board meeting.

Requested Motion:

1. A motion to recommend that the Governing Board make the required findings, as shown in Attachment A.
2. A motion to recommend Governing Board approval of lowering the Placer County IPES line from 726 to 702 and adoption of the proposed resolution included as Attachment B.

An affirmative vote of a majority of the quorum present is required to take the requested action.

Background:
TRPA adopted IPES as part of the 1987 Regional Plan to assess the suitability of vacant lots for single-family residential development. Between 1987 and 1989, field teams, including a soil scientist, a hydrologist, and a planner, evaluated more than 10,000 vacant residential parcels in the Tahoe Basin, assigning each a score from 0 to 1,150 along with a corresponding percentage of allowable coverage. Parcels were then ranked by jurisdiction according to their relative environmental suitability for development. Parcels scoring 726 or higher became eligible to apply for a building allocation beginning in 1989. IPES was designed so that parcels scoring below the cutoff of 726 could become eligible over time once the jurisdiction meets specific criteria, outlined below. When those criteria are met, annual adjustments to the IPES line are made. The program prioritizes development of the highest-capability parcels—those best able to support development and filter stormwater runoff. Since its adoption, IPES has successfully facilitated the gradual progression of residential development while protecting sensitive land.

Chapter 53 of the TRPA Code of Ordinances sets forth five findings that must be made for the IPES line to be lowered for a jurisdiction. Those findings are:

1. All parcels included in the top rank are otherwise eligible for development under the Lake Tahoe Water Quality Management Plan ("208 Plan" or "WQMP") and other legal limitations;
2. The monitoring program for that jurisdiction is in place pursuant to Chapter 16: *Regional Plan and Environmental Threshold Review* and the TRPA monitoring plan;
3. Demonstrable progress is being made on capital improvement programs for water quality within that jurisdiction;
4. The level of compliance with conditions of project approvals within any jurisdiction is satisfactory; and
5. For any jurisdiction, the number of parcels having scores below the level defining the top-ranked parcels, divided by the number of parcels in that jurisdiction that were identified as sensitive by TRPA on January 1, 1986, does not exceed the following percentages:
    a. El Dorado County- 20 percent
    b. Placer County- 20 percent
    c. Douglas County- 33 percent
    d. Washoe County- 33 percent

TRPA Code of Ordinances Section 53.5.1 directs that TRPA annually assess whether the required findings can be made to support lowering the IPES line. When the findings can be made, the IPES line shall be lowered based on the number of allocations used in that jurisdiction during the previous year. In 1994, the Governing Board began to incrementally lower the IPES line for Douglas County and Washoe County. Both jurisdictions reached a minimum buildable score of 1 in 2006. The IPES line in El Dorado County was first lowered in 2004 and reached a minimum buildable score of 1 in 2006.

The buildable line has remained at 726 in Placer County specifically due to finding 5.b (above), because the percentage of sensitive parcels exceeded 20 percent. In 1986, Placer County counted 1,667 undeveloped sensitive lots, requiring the removal of more than 1,334 parcels from the sensitive lot inventory to achieve the required ratio of 20 percent (also referred to as the vacant lot equation). Over time, the number of sensitive parcels has decreased through several mechanisms: (1) acquisition and retirement by the California Tahoe Conservancy's Environmentally Sensitive Land Acquisition Program; (2) acquisition and retirement through the USDA Forest Service Santini-Burton Act; (3) retirement through TRPA's Allocation Assignment Program; (4) purchase of additional IPES points through TRPA's IPES Limited Incentive Program[1]; (5) increases in parcel scores resulting from the implementation of Environmental Improvement Projects[2]; and (6) voluntary parcel mergers that reduce the total number of parcels in the jurisdiction. The ratio calculation in Finding 5 is also affected by parcels developed or under construction, as these parcels have consumed an allocation and development right and are no longer considered vacant lots included within IPES.

The initial rate of parcel retirement in Placer County during the 1990s was approximately 89 parcels per year, but that pace slowed over time to about 25 parcels per year by 2009. This decline was due primarily to reduced funding for acquisition programs and fewer property owners participating in the limited Incentive Program. An increase in sensitive parcels was also influenced by Placer County's

[1] The IPES Limited Incentive Program allows owners of properties with IPES scores within 10% of the buildable line to increase the points to the buildable line by either proposing and implementing an off-site water quality project or by paying a $1,121 per point mitigation fee that funds water quality projects in Placer County.
[2] Up to a maximum of 50 points are awarded to IPES parcels under the category "Need for Water Quality Improvement Projects in Vicinity of Parcel." As water quality improvement projects are completed, points are awarded to parcels within the direct project area, as specified in the technical standards in Code Section 53.10.7.

practice of embedding multiple legal lots within a single assessor's parcel number, often for tax purposes. In this scenario, a property owner can request that the County Assessor issue separate Assessor Parcel Numbers for each legal lot, which increases the total number of parcels in the jurisdiction. TRPA requires an IPES score for any vacant parcels where single-family residential development is proposed. If the IPES evaluation results in a score below 726, the number of sensitive parcels then increases.

Staff Recommendation: TRPA is able to make the required findings in Chapter 53 of the Code of Ordinances (see Findings in Attachment A), which, by procedure, triggers TRPA to lower the buildable line. Staff reviewed parcel-level changes over the past three years and determined that Placer County met the findings in 2022. The number of sensitive parcels in the vacant lot equation has fluctuated over the past three years as parcels were removed and added. To account for this, staff recommend lowering the IPES line in Placer County by a total of 34 places, reflecting 18 allocations issued in 2022, 10 in 2023, and 6 in 2024. This adjustment reduces the minimum buildable score from 726 to 702.

The proposed action, expected to be considered by the Governing Board in December 2025, is limited to lowering the IPES line in Placer County and does not involve reevaluating or rescoring any parcels, changing the scoring methodology, or allowing any net increase in regional development. The Regional Plan's development caps remain in effect, and any parcel proposed for development must obtain (and use) an allocation and the necessary development rights. Going forward, TRPA will conduct the IPES line analysis annually, with each subsequent year's allocation distribution considered separately.

Contact Information:
For questions regarding this agenda item, please contact Julie Roll at 775-589-5247 or jroll@trpa.gov.

To submit a written public comment, email publiccomment@trpa.gov with the appropriate agenda item in the subject line. Written comments received by 4 p.m. the day before a scheduled public meeting will be distributed and posted to the TRPA website before the meeting begins. TRPA does not guarantee written comments received after 4 p.m. the day before a meeting will be distributed and posted in time for the meeting.

Attachments:

A. Required Findings
B. Proposed Resolution

Attachment A
Required Findings

Required Findings

Finding 53.5.1.A.1: All parcels included in the top rank are otherwise eligible for development under the applicable state water quality management plan for the Lake Tahoe Basin (the "208 Plan") and other legal limitations;

Rationale: Staff finds that the proposed inclusion of additional parcels in the IPES top-rank category is consistent with the TRPA Code of Ordinances and the applicable state and federal water quality management requirements for the Lake Tahoe Basin. The 208 Plan, developed under Section 208 of the Federal Clean Water Act and certified by California, Nevada, and the U.S. Environmental Protection Agency in 1989, incorporated the IPES system as the mechanism for determining which vacant residential parcels are suitable for development. Under this framework, a parcel is considered eligible for development if it has an IPES score above the established buildable line, has no disqualifying constraints such as Stream Environment Zones, and can comply with TRPA land coverage and Best Management Practice requirements.

Although subsequent updates to the 208 Plan (including the 2013 amendment incorporating the Lake Tahoe TMDL) have modernized the document and removed explicit references to IPES, TRPA continues to administer IPES consistent with the 208 Plan's intent- to ensure that only parcels suitable for development under current water-quality protection standards may be built upon. Staff has verified that all parcels proposed for inclusion in the top-rank category meet these eligibility criteria and are otherwise consistent with applicable legal and environmental limitations.

Finding 53.5.1.A.2: The monitoring program for that jurisdiction is in place pursuant to Chapter 16: *Regional Plan and Environmental Threshold Review* and the TRPA monitoring plan;

Rationale: TRPA, with support from local jurisdictions and regional partners, maintains monitoring and reporting programs consistent with Chapter 16 requirements for water quality as well as other threshold categories. The most recent threshold evaluation was issued by the Governing Board in June of 2025, and is available at: https://thresholds.laketahoeinfo.org/

At the time the IPES program was adopted, the monitoring program requirements contained two primary elements. The first focused on stormwater and later tributary monitoring. Both monitoring programs continue to be implemented today through coordinated efforts between the jurisdictions and partners. Stormwater pollutant load control is coordinated through the Lake Tahoe Total Maximum Daily Load (TMDL). Load reductions are validated through the Clarity Crediting Program, which validates pollutant load reduction through monitoring.

The load reductions of the Clarity crediting program are verified through the Regional Stormwater Monitoring Program (RSWMP). RSWMAP, developed in 2015, is a collaboration between the Tahoe Resource Conservation District and the seven jurisdictions required to comply with the TMDL. RSWAMP is designed to validate that select Best Management Practices (BMPs) are monitored to ensure that these pollutant reduction strategies are having the desired effect. Additional details and monitoring results from the RSWAMP are available on LTINO.

The Lake Tahoe Interagency Monitoring Program implemented by the United States Geological Survey (USGS) provides concentration and load data for nutrients and fine sediment particles in the Tahoe Basin. The LTIMP program provides a long-term record of water-quality data, especially nutrient and sediment data, necessary to document the local and regional effectiveness of environmental programs and to assure compliance with California and Nevada water-quality management programs. Additional details and real-time results from the program are available on the USGS Lake Tahoe webpage.

Placer County is a partner in the above monitoring efforts, so they are meeting their monitoring requirements per the standards in Chapter 16 of the TRPA Code of Ordinances.

Finding 53.5.1.A.3: Demonstrable progress is being made on capital improvement programs for water quality within that jurisdiction;

Rationale: Placer County has made a significant investment in capital improvement projects targeting the water quality threshold category. Since 2008, approximately 15 water quality improvement projects have been completed in Placer County, with a total expenditure of $109,900,574. An additional seven water quality improvement projects are in the planning and design phases, slated for implementation within the next five years, with an expected expenditure of $70,018,874. Detailed information on each of these Environmental Improvement Program (EIP) projects is available at https://eip.laketahoeinfo.org/.

Finding 53.5.1.A.4: The level of compliance with conditions of project approvals within any jurisdiction is satisfactory;

Rationale: Pursuant to TRPA Code, Section 13.8.3: Annual Review, and the Performance Review System addressed in TRPA Code, Section 50.5: Allocation of Additional Development, TRPA conducts an annual audit of permits issued by partners. Based on the most recent audit in 2024, TRPA staff recommended that the Governing Board recertify the existing delegation of authority memorandum of understanding with Placer County and distribute the base number of residential allocations minus one increment deduction for failing to meet Total Maximum Daily Load (TMDL) targets in the 2024 TMDL Best Management Practices Performance Report. The report documented that Placer County did not reach its target pollutant load reductions in 2023 due to impacts from historic snowfall and low temperatures, which caused difficulties in replacing filter cartridges and scheduling road condition assessments. Though Placer County fell short in achieving clarity credits, its registered stormwater Best Management Practices and other non-registered stormwater facilities throughout Placer County were well-functioning and helped prevent fine sediment particle inputs to the lake. In the 2025 Lake Tahoe TMDL Program 2025 Performance Report, published in July 2025, Placer County exceeded its 2024 Credit Target, and the issues identified in the 2024 report were resolved.

Finding 53.5.1.A.5: For any jurisdiction, the number of parcels having scores below the level defining the top-ranked parcels, divided by the number of parcels in that jurisdiction that were identified as sensitive by TRPA on January 1, 1986, does not exceed the following percentages;

a. El Dorado County- 20 percent
b. Placer County- 20 percent
c. Douglas County- 33 percent
d. Washoe County- 33 percent

Rationale: In 1986, 1,667 parcels were identified as sensitive in Placer County. The last IPES line status report presented to the TRPA Governing Board was in February 2010. At that time, staff recommended no action because the findings to lower the IPES line in Placer County could not be made. Staff determined that an additional 111 sensitive parcels needed to be retired or otherwise removed from the analysis to meet the required 20 percent threshold for Placer County.

In 2024, TRPA staff conducted a comprehensive review and analysis of the IPES data for Placer County, using parcel data from the 2007 analysis as the baseline. Staff reviewed each vacant parcel with a score below 726 to determine whether it could be removed from the sensitive parcel list because it had been retired, consolidated through a parcel merger, or because the score increased above the sensitive parcel threshold (currently 726) through the Limited Incentive Program or implementation of Environmental Improvement Program projects. As a result, 153 parcels were removed from the list of sensitive parcels. At the same time, 16 new sensitive parcels were added because TRPA continues to evaluate new and previously unscored parcels in Placer County (approximately 10 to 15 per year) and some of these evaluations resulted in scores below 726.

Summary of 2025 IPES Calculation:

| | | |
|---|---|---|
| Parcels Below Line (726) as of 2007 Analysis | 454 parcels | Based |
| Parcels with scores increased to 726[3] | -52 parcels | on this |
| Voluntary Parcel Merger | -79 parcels | |
| Parcels Retired | -11 parcels | |
| Parcels evaluated under Bailey (multi-family, commercial, etc.)[4] | -12 parcels | |
| Net parcels added from splits | +6 parcels | |
| New IPES Scores Added (Below 726) | +16 parcels | |
| Parcels Below Line (726) as of 2025 | 322 parcels | |

analysis, 322 sensitive parcels currently remain in Placer County. In accordance with Finding Number 5, this figure is divided by 1,667 (the number of sensitive parcels identified in 1986) resulting in a percentage of 19.3%, which is below the 20% threshold.

[3] Points increased through participation in the Limited Incentive Program or by being awarded water quality points associated with a completed EIP project[3]

[4] IPES is used to determine eligibility for single-family development only. A Bailey land capability evaluation is used for any other proposed use (multi-family, commercial, public service, etc.). If a parcel evaluated under IPES is later developed under Bailey, the IPES score is deactivated.

Attachment B
Proposed Resolution

TAHOE REGIONAL PLANNING AGENCY
TRPA RESOLUTION NO. 2025–

RESOLUTION LOWERING THE NUMERICAL LEVEL DEFINING THE TOP RANKED PARCELS IN PLACER COUNTY

WHEREAS, the 1987 Regional Plan and Code of Ordinances implemented the Individual Parcel Evaluation System (IPES) to evaluate and determine eligibility for development for vacant residential parcels; and

WHEREAS, a component of IPES is the potential for annually lowering the numerical level defining the top-ranked parcels ("IPES line") in a given jurisdiction; and

WHEREAS, the numerical level defining the top rank in a given jurisdiction cannot be lowered unless TRPA makes five certain findings as set forth in Chapter 53 of the TRPA Code of Ordinances; and

WHEREAS, the Governing Board has provided notice to the public and conducted a public hearing on the five required findings; and

WHEREAS, the Governing Board has set numerical performance standards for the criteria used to determine the level of compliance with conditions of approval in TRPA resolution 93-19; and

NOW, THEREFORE, BE IT RESOLVED that the Governing Board of the Tahoe Regional Planning Agency finds, based on substantial evidence in the record, that:

(1) All parcels in Placer County included in the top rank are otherwise eligible for development under the applicable state water quality management plan for the Lake Tahoe Basin (208 Plan) and other legal limitations;
(2) The monitoring program for Placer County is in place pursuant to Chapter 16 of the TRPA Code of Ordinances;
(3) Demonstrable progress is being made on capital improvement programs for water quality in Placer County, as evidenced by their funding of recently completed projects as well as projects in the planning and implementation phases;
(4) Placer County's level of compliance with conditions of project approvals is satisfactory; and

(5) In Placer County, the number of vacant parcels below the level defining top-ranked parcels, which is 322, divided by the number of vacant parcels deemed sensitive on January 1, 1986, which is 1,667, equates to 19.3 percent and therefore does not exceed 20 percent.

BE IT FURTHER RESOLVED that by applying the standard set forth in Subsection 53.5.1 for the three prior years for which applicable findings could be made, the Governing Board hereby lowers the numerical value defining the top rank in Placer County by 34 parcels to reach a score of "702", such that all parcels scored "702" or higher are now within the top rank of parcels in Placer County.

PASSED AND ADOPTED by the Governing Board of the Tahoe Regional Planning Agency this_____ day of_____,2025, by the following vote:

Ayes:

Nays:

Abstain:

Absent:

_____
Hayley Williamson, Chair
Tahoe Regional Planning Agency
Governing Board