From: Ann Nichols <preserve@ntpac.org>
Sent: 3/11/2026 9:38:23 AM
To: Public Comment <PublicComment@trpa.gov>; Boardclerk <boardclerk@placer.ca.gov>
Cc: Gavin Feiger <gavin@keeptahoeblue.org>; DarcieGoodman-Collins <Darcie@keeptahoeblue.org>; Alexis <alexis@mapf.org>;
Subject: Million-Dollar Homes Are Not Workforce Housing -APC 3/11/26

Title: Million-Dollar Homes Are Not Workforce Housing

NTPA would like to address the proposed income cap of $245,000 for deed-restricted “achievable housing.”

When you run the numbers, this policy raises a serious question about who the program is actually designed to serve.

A household earning $245,000 per year has roughly $20,000 in monthly income. Using standard mortgage underwriting, that household can afford a housing payment of around $6,000 per month, which translates into a home price in the range of $900,000 to $1.1 million depending on interest rates and down payment.

In other words, the policy effectively defines million-dollar homes as achievable housing.

This also dramatically exceeds traditional workforce housing definitions.

In both Placer and Washoe Counties, Area Median Income is roughly $105,000 to $120,000. An income cap of $245,000 represents over 200 percent of Area Median Income.

Housing policy across the country generally defines workforce housing between 80 and 120 percent of AMI, occasionally extending to about 160 percent in high-cost regions.

Two hundred percent of AMI is not workforce housing.

To put this in national context, a household earning $245,000 is essentially in the top 10 percent of households in the United States.

Meanwhile, most of Tahoe’s actual workforce — teachers, firefighters, hospitality workers, nurses, and local service employees — earn between $60,000 and $140,000 a year.

So the question becomes: who is this program really serving?

When the income cap rises this high, the program stops solving Tahoe’s workforce housing problem and starts solving the financial feasibility problem for large redevelopment projects.

If the goal is truly to house the local workforce, then the eligibility levels should reflect the incomes of the workforce.

Because redefining million-dollar homes as achievable housing does not solve Tahoe’s housing crisis — it simply redefines it.

Thank you.

Ann Nichols

From: Pamela Tsigdinos <ptsigdinos@yahoo.com>
Sent: 3/10/2026 4:43:54 PM
To: Public Comment <PublicComment@trpa.gov>
Subject: Public Comment: Agenda Item No. 4. A, Cultivating Community, Conserving the Basin: Six Policy Concepts
Attachments: APC.3.11.25.PublicComment Agenda Item4A.pdf

Please include my public comment into the public record and distribute to staff and APC Commission Members.
Thank you, Pamela

Agenda Item No. 4. A, Cultivating Community, Conserving the Basin: Policy Concepts

March, 10, 2026

Advisory Planning Commission (APC) Members,

Please see my comments regarding several of the policy concepts that need much more work.

Policy Concept 4.1: Income limits on achievable housing, including but not limited to an income cap not to exceed 245% of the respective local jurisdiction's area median income (AMI), along with a local living/work requirement and enforcement/audit provisions.

The "achieve housing" -- definition is confusing at best. One of TRPA's goals in its process was to build community engagement and expertise around land-use planning and policies and build trust. One way to do this was to increase transparency and simplify terminology. The current definition is 120% AMI, or 30 hours of work from one person in the household, or retired. 120% AMI is moderate housing.

Why include this as an option in the achievable housing definition? Has a single achievable bonus unit been utilized by complying only with the 120% AMI criterion?

In the Coburn Crossing example, the developer had a hard time renting at the local-worker/market-rate rents, so they started renting to anyone, which, upon being audited in 2020, showed that ⅓ of units were not being rented to workers in the TTUSD district being rented to workers in the TTUSD district; they were rented to anyone who could afford the units, i.e. market rate.

A Town of Truckee audit revealed that the property manager was not upholding the local priority preference restriction. The Town revealed the audit in 2020, which found abuse of incentives and deed-restrictions that were not honored; the units went to those who could afford them, especially in Truckee Tahoe, where we have more affluent visitors and second-home owners who enjoy a weekend ski or summer lease. Market-rate rents are problematic for meaningful deed restrictions, and projects that receive benefits or incentives must be audited.

Overall, the lack of an income cap is questionable and does not align with the housing policy goals this package is directed at confronting. Others, including Governing Board Member, Shelly Aldean, at the November 19, 2025, draft policy package workshop, expressed concern that the Achievable Housing definition is indeed problematic. Ms. Aldean indicated that there is too much flexibility. The requirement should be 30 hours of work in the basin with an income cap, and deed-restriction monitoring and audits. This is critical for ensuring that the incentives and benefits provided lead to the creation of the housing Tahoe needs: housing for the local workforce, seniors, low-income, and disabled communities.

Policy Concept 4.2: An assessment of criteria to address potential site-specific impacts, including but not limited to impacts to scenic resources and public safety (wildfire dangers and evacuation hazards) in the event TRPA considers development incentives in areas outside of Town Centers.

This policy concept was included in MAP's lawsuit Settlement Agreement to ensure that the Environmental Impact Statement (EIS) fully analyzes site-specific impacts related to any proposed policy changes. Without including a specific proposal or alternative in the environmental review process, it will be near impossible to understand the full scope of potential site-specific impacts. A model must be created to illustrate land use conversions and impacts on neighborhoods in the basin. For example, one potential proposal is to allow the conversion of single-family dwellings into duplexes, triplexes, and fourplexes and to exempt them from project-level environmental review. To allow these projects to tier from the Cultivating Community EIS, all potential site-specific impacts must be evaluated under the EIS, and criteria to address such impacts, **such as impacts on emergency evacuation, must be included in the process.** There must be a more robust good-faith discussion on this topic once the final policy proposal is solidified and the Draft EIS is available for review

Policy concept 4.3: Refining criteria for added height outside of Town Centers

There is policy consideration to allow local jurisdictions to expand Town Center boundaries. This would, in effect, allow for additional height outside of existing Town Centers. Accordingly, there should be good-faith discussions now about refining the criteria for additional height beyond the current Town Center boundaries. It is important to have a more robust conversation on the impacts and potential benefits of height, so that TRPA can have baseline data to inform these policies. Communities are often met with land use applications and projects asking for height variances, that yield an economic benefit for the developer, **BUT they do not take into account the environmental and public safety impacts/loss that tall buildings can create, and the loss of solar aspect for the built environment around the proposed structure, the frozen and icy streets and sidewalks that form around the dwelling**, and the associated impact height can bring to a small town center or adjacent parcel.

Policy Concept 4.4: Incentives/programs to unlock the existing housing supply, including but not limited to regulation of short-term rentals and investment in Lease to Locals, down payment assistance, workforce, or equivalent programs.

With approximately 50% of existing housing stock in the Tahoe Basin sitting vacant most of the year. One of the fastest, most environmentally friendly strategies for addressing the housing crisis is to unlock existing units through regulation of short-term rentals. This must be done basin wide. Further, this is a low-hanging fruit way to address the housing crisis, quickly. Please see this story for more information:

Basin-wide short-term rental caps must be part of TRPA's housing plan
https://www.tahoedailytribune.com/news/basin-wide-short-term-rental-caps-must-be-part-of-trpas-housing-plan-opinion/

Policy Concept 4.6: A one spot per unit minimum parking requirement

The current conditions do not adequately facilitate the transition away from automobiles toward public transportation. This agency must not ignore the reality we live in. Do not further burden locals with increased congestion due to reduced parking requirements.

Further, many lower-income residents hold multiple jobs that require frequent travel, which is currently unavailable on Basin transportation networks. As such, they must utilize private automobiles. Not planning for the reality of the Tahoe Basin places a greater burden on lower-income residents, creating an equity issue. The Phase 3 process was intended to target solutions for social and environmental equity, not to create more barriers for the population to be supported.

Under the Phase 2 Amendments, deviations from local parking standards must be supported by a parking study. However, it was never clear what needed to be included in the parking study. Additionally, local jurisdictions were told they could "opt out" of the amendments. However, again, it was unclear exactly what was needed to opt out. The Washoe Tahoe jurisdiction attempted to "opt out" of the Phase 2 parking amendments based on input from its constituents like me and many others as reported here, but we were unsuccessful. It became apparent during the process that the barrier to opting out was incredibly high and improbable. Washoe Tahoe residents were betrayed by Washoe County when it voted not to an "opt out" of this amendment. Further, **TRPA's strong arming throughout the Washoe County planning workshop process to comply with the amendment changes served to further lose community trust**.

In closing, the scope of the myriad land-use amendment is broad, the potential impacts many; the details have yet to be fully spelled out, and the timeline for adoption in the early part of 2027 is highly concerning.

As to the MAP Settlement Agreement policy considerations, I concur with MAP when it writes: "It's clear that without understanding the full implications, it is challenging to have good-faith discussions. The current approach for the Environmental Impact Statement (EIS), as stated by staff, is to include a wide array of policy recommendations in the EIS and then to refine the proposal down the road."

Tahoe basin residents have heard Governing Board members state that the environmental review process is too late to change the policies, so it has been hard to understand when, where, and how the TRPA expects ideas and conversations to shape future innovative policies and programs to ensure that Tahoe maintains its growth cap and focuses on the housing its needs, versus more luxury developments for visitors and for those who do not

live and work full-time in the Tahoe basin. As stated by Governing Board members and APC members, the devil is in the details and right now, the public does not have the details.

To quote MAP's leadership: "Moving forward, we hope that staff will further define the potential alternatives to be evaluated in the EIS and will continue to facilitate discussions around the Settlement Agreement considerations, as necessary."

Major redevelopment projects in the Tahoe basin should not be able to proceed without updated environmental analysis simply because they conform to an area plan adopted more than a decade ago. Environmental review should not be frozen in time.

Since the 2012 Regional Plan Update, the Basin has experienced greater wildfire risk, increased congestion, and far higher peak visitation. To pretend otherwise will put the public and the Tahoe basin at great risk. **Prioritize public safety and protect the Lake and its fragile environment.**

Pamela M Tsigdinos
Full-time Washoe Tahoe resident