

Appendix H

Comment Letter 99 Attachment

Waller, Ellie

Comments on the

Placer County Tahoe Basin Area Plan 2nd

NOP, Area Plan document, and

Implementing Ordinances

Comments on the NOP

We will be looking closely at the environmental analysis as related to Land Use Plan and related policies and expecting scientific proof and contribution to threshold achievement.

Beginning in late 2012 the County formed citizen advisory groups referred to as “plan area teams” to help draft vision statements, zoning, development standards and design guidelines for each sub-area within the Plan Area boundary. **The plan area teams have begun visioning and addressing land use and scale within each sub-area.** Drafts of working maps, zone district maps, vision statements, district standards, and design guidelines are available on the County’s Community Plan Update website. Page I-9 of the Existing Conditions Report September 2013.

The detailed worked sessions held with the “plan area teams” for over two years resulted in little to no translation in the sub-areas/sub-districts in the revised NOP documentation. Provide an alternative in the EIR/EIS that represents and utilizes what the plan area teams requested for height, density, community character, etc. (not TRPA maximums in code) which were captured by Placer Staff and consultants. Where questions about land-use, scale, etc. arise, reconvene the plan area team for clarification to develop the alternative.

*The alternatives must feasibly attain most of the basic project objectives while avoiding or substantially lessening the project’s environmental impacts. (See Public Resources Code § 21100(b)(4); see also CEQA Guidelines § 15126.6(a).) **The CEQA Guidelines state that the selection and discussion of alternatives should foster informed decision-making and informed public participation.** (See CEQA Guidelines § 15126(d)(5).) Alternatives to the Project – The alternatives must include a comparative analysis between the project and the selected alternatives.*

In addition to community and general plans, Plan Area Statements (PASs) provide specific land use policies and regulations for individual “Plan Areas.” The Placer County portion of the Region is divided into **57 separate Plan Areas**. For each Plan Area, a “statement” is made as to how that particular area should be regulated to achieve environmental and land use objectives. Each PAS includes a description, land classification, management strategy, planning considerations, special designations, special policies, use regulations, and density limitations
Page 3-29 Chapter 3: Land Use, Community Design and Development Potential Existing Conditions Report

G. Upon adoption, the provisions of the Area Plan will supersede the six Community Plans and **51 Plan Area Statements** that were previously adopted by Placer County and TRPA for the area. It will also replace two previously adopted Placer County General Plans
From Implementing Regulations document pgs 1-156 on page 9 of the document Page 2 at bottom of the page

All reports, studies, documentation, figures, tables, etc. must report data consistently to insure environmental analysis is accurately completed. TRPA website confirms 57 Plan Area Statements in Placer County. The Draft Area Plan EIR/EIS must reflect the correct information as well as being consistently reported in all reference materials and the NOP.

4.1 Land Use Strategy Page 1 Land Use Plan: page 71 on bottom of page

This Land Use Plan promotes redevelopment of the built environment, multi-modal transportation options and enhanced economic conditions. Regional Plan incentives for compact and environmentally sensitive redevelopment are applied in the Town Centers of Tahoe City, Kings Beach and North Stateline. Incentives to transfer development from sensitive lands and outlying areas to these Centers are also provided.

Additional amendments are implemented for the lower intensity Village Centers throughout the Plan area. In these traditionally commercial nodes, the Plan promotes mixed land uses, environmental gain and high quality design. Village Centers include Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista.

The Draft Area Plan EIR/EIS must disclose and list the specific amendments for lower intensity Village Centers and provide detailed criteria and environmental analysis for the amendments proposed for each of the Village Centers listed above.

The Draft Area Plan EIR/EIS must include a list of Plan Area Statement amendments for review and subsequent environmental analysis and approval as the Area Plan documentation states the addition of mixed-use where commercial, light industrial, etc. were originally analyzed as individual zoning in the 1987 Regional Plan and now will have new impacts due to the mixed-use overlay and nomenclature used throughout the documentation.

If there are no changes to the non-Town Center sub-areas is a mixed-use overlay applicable and mixed-use code of ordinances applicable to Village Centers, Neighborhood Centers, anywhere mixed-use has been stated? Does the mixed-use overlay for re-developing or new development allow code applicability for greater coverage and density for sub-areas outside Town Centers? Code states otherwise. Provide detailed criteria for transition areas as they will be affected by their proximity to Town Center boundaries.

Table 13.5-3.1

[1] With adoption of an Area Plan. To ensure compatibility with adjacent uses and viewshed protection, the findings in Sec. 37.7.16 shall apply.
[2] Limited to replacement structures, provided, the structures to be demolished and replaced are an existing casino hotel, with existing structures of at least eight stories, or 85 feet of height as measured from the lowest point of natural grade. Such structures shall also comply with Sec. 37.7.17.
[3] Areas of Community Plans outside of Centers shall not be eligible for the alternative height and density allowances authorized in Area Plans for Centers. Any existing project density approved pursuant to Section 31.4.3 may be retained in an Area Plan.
[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.

7. Mixed-Use (Formerly Commercial and Public Service Areas)

Mixed-use areas are urban areas that have been designated to provide a mix of commercial, public services, light industrial, office, and residential uses to the region or have the potential to provide future commercial, public services, light industrial, office, and residential uses. The purpose of this classification is to concentrate higher intensity land uses for public convenience and enhanced sustainability. Any amendment to a plan area statement that is adopted after the adoption of this Code may retain the name of the Commercial and Public Services Area land use classification, however, Area Plans shall utilize the Mixed-use classification.

TRPA Code of Ordinances

Adopted by Governing Board December 12, 2012 | Amended January 28, 2015 | Page 11-3

The TRPA code is problematic and confusing as the Plan Area Statements are not being amended but must identify former areas (Commercial & Public Service) as Mixed-Use.

The Draft Area Plan EIR/EIS must change the non-Town Center sub-areas and sub-districts back to the original community plan designations until the sub-areas are analyzed in future Area Plan amendments for clarity of applicability to TRPA Code of Ordinances, Goals and Policies, etc. Placer must work with TRPA to resolve this conflict.

CHAPTER 31: DENSITY
 31.5 Calculation of Maximum Density
 31.5.1 Single Uses

31.5. CALCULATION OF MAXIMUM DENSITY

The maximum density that may be permitted within a project area shall be calculated as set forth in this section.

31.5.1. Single Uses

For a single use, the maximum density established in Section 31.3 shall be applied to the project area.

31.5.2. Mixed Uses

For two or more uses, the maximum densities shall be established through the following process: (1) determine the category or categories of mixed use on the parcel or project area, pursuant to subsection A below; and (2) determine the rules applicable to that category of mixed use pursuant to subsection B below.

A. Categories of Mixed Use

The category of the mixed use shall be determined from the following table. Select the first proposed use from the left-hand column and the second proposed use from the top-level row. Any other combination of uses not shown in the table, including three or more uses in any project area, is assigned to Category F.

TABLE: 31.5.2-1: CATEGORIES OF MIXED USE

	Single-Family Dwelling Summer Home	Multi-Family Dwelling Mobile Home Dwelling Multi-Person Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	Other Tourist Accommodation (less than 20% kitchens) Other Tourist Accommodation (greater than or equal to 20% kitchens)	Developed Campgrounds Recreation Vehicle Parks Group Facilities	Commercial Use Public Service Use Other Recreational Use Resource Management
Single-Family Dwelling Summer Home		A	A	A	D
Multi-Family Dwelling Mobile Home Dwelling Multi-Person Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	A	B	B	B	E
Other Tourist Accommodation (less than 20% kitchens) Other Tourist Accommodation (greater than or equal to 20% kitchens)	A	B	C	B	E
Developed Campgrounds Recreation Vehicle Parks Group Facilities	A	B	B	B	F

CHAPTER 31: DENSITY
 31.5 Calculation of Maximum Density
 31.5.3 Mixed Uses

TABLE: 31.5.2-3: CATEGORIES OF MIXED USE

	Single-Family Dwelling Summer Home	Multi-Family Dwelling Middle Home Dwelling Multi-Unit Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	Other Tourist Accommodation (less than 20% kitchen) Other Tourist Accommodation (greater than or equal to 20% kitchen)	Developed Campgrounds Recreation Vehicle Parks Group Facilities	Commercial Use Public-Service Use Other Recreational Use Resource Management
Commercial Use Public-Service Use Other Recreational Use Resource Management	D	M	F	F	G

B. Maximum Density for Mixed-Use Categories

Depending upon the category of the mixed uses, as determined from Table 31.5.2-1, maximum density shall be calculated as follows:

1. Category A

In Category A, a single-family dwelling or summer home shall be treated as equivalent to another residential unit, tourist unit, or campsite. Maximum densities for all other residential units, tourist accommodation units, or campsites shall be in accordance with Table 31.3.2-1. Conversion factors set forth in subsection 31.3.3 shall be applied as appropriate.

2. Category B

In Category B, the maximum density shall be calculated as a proportional share of the maximum densities for the combined uses, rounded to the next lowest whole number.

Page 1 of Land use Plan

4.1 Land Use Strategy

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Additional amendments are implemented for the lower intensity Village Centers throughout the Plan area. In these traditionally commercial nodes, the Plan promotes mixed land uses, environmental gain and high quality design. Village Centers include Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista.

Page 2 of Land use Plan

In the existing single family neighborhoods, development standards remain largely unchanged and environmental restoration is emphasized. To provide housing for the area's workers, additional opportunities for secondary dwelling units are provided on properties near the Village Centers and transit services.

The Draft Area Plan EIR/EIS must provide detailed environmental analysis and diagrams by sub-area (so they are readable by the public/agencies) showing proposed locations for secondary dwelling units in Town Centers as well as properties near the Village Centers. Provide criteria for "near" the Village Centers.

Town Centers must provide fair-share affordable housing within in the Town Center Boundary in support of the Regional Plan goals and Area Plan goals for walkable, bikeable, livable, workable communities and especially a reasonable balance in the Town Centers of Tahoe City and Kings Beach.

Commercial Floor Area (CFA) Page 15 Land Use Plan : page 85 bottom of page

Placer County's CFA supply totals 72,609 square feet (Feb 2015). Placer County may assign this CFA with project approvals. Some CFA is reserved for certain areas and some is available throughout the Plan. The County's current CFA supply is listed on Table 4.3-D.

TRPA also has a CFA supply that is used for development transfer bonus units and other programs. The TRPA supply totals 160,347 square feet for the region (Nov 2015). TRPA has an additional 200,000 square feet that may be used once the current supply is exhausted. Utilization of new CFA has been slow.

The Draft Area Plan EIR/EIS must disclose and list where, throughout the plan, CFA is targeted to be used and provide detailed environmental analysis and diagram showing locations.

Table 4.3-E: Placer County TAU Supply Page 15 Land Use Plan: page 85 bottom of page

Location of Use Units

Tahoe City – Remaining from 1987 Plan 25

Kings Beach - Kings Beach Center 10

Kings Beach - Owned by

Redevelopment Successor Agency;

Eastern Gateway 6

Kings Beach – Units committed and in process; Community House 8

Total Available or in Process 49

The Draft Area Plan EIR/EIS must provide a table showing all existing TAU's by sub-area (not just the Town Centers in Table 4.3E) to allow the public/agencies to better understand and evaluate all the sub-areas and overall number of TAU's by location within the Placer County Tahoe Basin Area Plan to determine appropriate proposed future new development and redevelopment in and outside Town Centers.

LAND USE CONVERSIONS page 16 Land Use Plan: page 86 bottom of the page

The Regional Plan allows land use conversions through several programs. These programs allow TAUs to be converted to either CFA or Residential Units, but do not allow CFA to be converted to TAUs. A process to convert some of the regional bonus unit pool of CFA to TAUs is being developed by TRPA. This Area Plan expands upon the TRPA programs with a pilot program for on-site conversions from CFA to TAUs and conversions of the Placer County supply. The program is intended to facilitate the most likely redevelopment projects and is described below in the Area Plan Program section.

The Draft Area Plan EIR/EIS must provide detailed environmental analysis for those areas that will be converting CFA to TAU as the Regional Plan has not been amended to allow this type of conversion. Disclose and provide a list of proposed on-site locations for proposed conversion and elsewhere conversions of the Placer County supply will be applied. Add policy restriction to only allows on-site conversion of CFA in Town Centers not all Mixed-use areas as Tahoe Vista has 16% of the commercial area within the Area Plan. See reference below from Existing Conditions Report. Page 3-11 Existing Conditions Report land Use section Chapter 3

Commercial

Commercial land comprises 0.3 percent of land (177 acres) in the Plan Area. The plurality of this acreage—nearly 46 percent—is located in Tahoe City. Tahoe Vista (16 percent) and Kings Beach (12 percent) also have large amounts of commercial land. Commercial land uses are generally located adjacent to the SR 28 and SR 89 corridors and consist of office, retail, church, and service commercial uses. Within Tahoe City the majority of commercial land is located near the “Wye” intersection, generally to the west of SR 28 and SR 89. However a few large commercial parcels are located along the shoreline of Lake Tahoe. The majority of retail development in Tahoe City is clustered in “mini-centers” east of SR 28 adjacent to Lake Tahoe. Smaller pockets of commercial land are also located in Dollar Point, Carnelian Bay and Homewood.

4.4 Area Plan Programs Page 17 Land Use Plant: page 87 bottom of the page

In response to the continued ecological degradation of Lake Tahoe and its environs, in large part due to pollution originating from existing development, policies in the Regional Plan aim to create walkable communities, increase alternative transportation options, and facilitate “environmental redevelopment” of existing built areas. The Regional Plan maps and defines land use classifications and priority redevelopment areas, including Town Centers, as areas where sustainable redevelopment is encouraged, subject to design and development requirements. **Placer County has three designated Town Centers – Tahoe City, Kings Beach and North Stateline.** The Regional Plan requires that Area Plans “preserve the character of established residential areas outside of Centers, while seeking opportunities for environmental improvements”.

North Stateline is currently part of the Kings Beach Town Center and has been identified as Special Area # 5 for more detailed future planning. The Special Area is zoned Mixed-use Tourist as identified on North Tahoe East Mixed Use Districts Map. The Draft Area Plan EIR/EIS must provide detailed environmental analysis for the North Stateline area as related to the zoning identified (mixed-use tourist) on current maps in the NOP not as a Town Center.

“To utilize Town Center incentives, properties within the North Stateline Special Plan Area shall prepare a detailed Town Center plan addressing TRPA requirements, including for Open Space” Page 94 of the Land Use Plan

The Town Center of North Stateline includes a relatively small area that adjoins and is integrated with larger Town Center properties on the Nevada side of the state line. The Area Plan is focused on Town Center planning efforts within Kings Beach and Tahoe City. **A Town Center plan was not prepared for North Stateline.** Instead, property owners may continue to operate under existing land use provisions, or may apply for a Special Plan as outlined below to implement the Town Center incentives and address the Regional Plan requirements. Page 96 of the Land Use Plan

The Draft Area Plan EIR/EIS must correctly identify North Stateline as Mixed-use Tourist as identified on Pages 71, 87, 91, 98 and Figure 4.5 in the Land Use Plan Part 4. Introduction Page 6 as well as anywhere else it is misrepresented in the Area Plan, NOP, etc. documentation that will be included in the environmental documentation for analysis.

Redevelopment Incentives for Town Centers: Page 17 of Land use Plan: page 87 bottom of the page

The Area Plan implements Regional Plan redevelopment incentives in Town Centers. Regional Plan standards will be used for building height (**3-4 stories**), density (**25 units/acre for residential and 40 units/acre for tourist**) and maximum land coverage (50-70 percent of

non-sensitive lands). The above described development transfer incentives also become effective upon adoption of this Area Plan.

The Draft Area Plan EIR/EIS must provide all TRPA code provisions showing requirements for residential, tourist, etc. Not all tourist projects qualify for 40 units per acre- add a similar Table (see South Shore Area Plan example below). Include in the Draft Area Plan EIR/EIS the maximum height allowed in Town Centers and Outside Town Centers and give examples of additional height that will be allowed based on Chapter 37 findings.

31.3.2. Table of Maximum Densities

Except where a TRPA plan area statement or adopted plan sets a more restrictive standard, no person shall create a density that exceeds the limits set forth in Table 31.3.2-1, except as provided in Section 31.4, increases to Maximum Density.

TABLE 31.3.2-1: MAXIMUM DENSITIES	
Use	Maximum Density
Residential Uses	
Single-family dwelling (parcels less than one acre)	1 unit per parcel
Single-family dwelling (parcels greater than or equal to one acre)	2 units per parcel, provided one unit is an authorized secondary residence
Summer home	1 unit per parcel or lease site
Multiple-family dwelling	15 units per acre
Mobile-home dwelling	8 units per acre
Multi-person dwelling, nursing and personal care, and residential care	25 persons per acre
Tourist Accommodation Uses	
Bed and breakfast	20 units per acre
All other: - If less than 50 percent of the units have kitchens - If greater than or equal to 50 percent of the units have kitchens	40 units per acre 15 units per acre
Recreational Uses	
Developed campgrounds	8 sites per acre
Recreation vehicle parks	10 sites per acre
Group facilities	25 persons per acre

37.4.1. Maximum Heights for Buildings

Outside of Centers and except as provided in Section 37.5, the maximum heights for buildings are set forth in the following table:

TABLE 37.4.1-1: MAXIMUM HEIGHTS FOR BUILDINGS												
Percent Slope Retained Across Building Site	Roof Pitch											
	0:12	1:12	2:12	3:12	4:12	5:12	6:12	7:12	8:12	9:12	10:12	12:12
0	24'-0"	25'-2"	26'-5"	27'-7"	28'-9"	30'-0"	31'-2"	32'-5"	33'-7"	34'-9"	36'-0"	36'-0"
2	24'-0"	25'-0"	26'-1"	27'-4"	28'-6"	29'-8"	31'-0"	32'-3"	33'-5"	34'-7"	35'-9"	36'-0"
4	25'-0"	26'-2"	27'-5"	28'-7"	29'-9"	31'-0"	32'-3"	33'-5"	34'-7"	35'-9"	37'-0"	37'-0"
6	25'-0"	26'-0"	27'-1"	28'-4"	29'-6"	31'-0"	32'-3"	33'-5"	34'-7"	35'-9"	37'-0"	37'-0"
8	26'-0"	27'-2"	28'-5"	29'-7"	30'-9"	32'-0"	33'-3"	34'-5"	35'-7"	36'-9"	38'-0"	38'-0"
10	26'-0"	27'-0"	28'-1"	29'-4"	30'-6"	32'-0"	33'-3"	34'-5"	35'-7"	36'-9"	38'-0"	38'-0"
12	27'-0"	28'-2"	29'-5"	30'-7"	31'-9"	33'-0"	34'-3"	35'-5"	36'-7"	37'-9"	39'-0"	39'-0"
14	27'-0"	28'-0"	29'-1"	30'-4"	31'-6"	33'-0"	34'-3"	35'-5"	36'-7"	37'-9"	39'-0"	39'-0"
16	28'-0"	29'-2"	30'-5"	31'-7"	32'-9"	34'-0"	35'-3"	36'-5"	37'-7"	38'-9"	40'-0"	40'-0"
18	28'-0"	29'-0"	30'-1"	31'-4"	32'-6"	34'-0"	35'-3"	36'-5"	37'-7"	38'-9"	40'-0"	40'-0"
20	29'-0"	30'-2"	31'-5"	32'-7"	33'-9"	35'-0"	36'-3"	37'-5"	38'-7"	39'-9"	41'-0"	41'-0"
22	29'-0"	30'-0"	31'-1"	32'-4"	33'-6"	35'-0"	36'-3"	37'-5"	38'-7"	39'-9"	41'-0"	41'-0"
24	30'-0"	31'-2"	32'-5"	33'-7"	34'-9"	36'-0"	37'-3"	38'-5"	39'-7"	40'-9"	42'-0"	42'-0"

Notes: Cells shaded in gray are considered "additional height" and subject to additional approval criteria in Sec. 37.4 through 37.5.

CHAPTER 37: HEIGHT

37.5 Additional Height for Certain Buildings

37.5.2 Additional Building Height for Public Service, Tourist Accommodation, and Certain Recreation Buildings

- A. Additional Building Height With Required Findings
- The maximum heights specified in Table 37.4.1-1 may be increased by up to four feet, but not to exceed a maximum height of 38 feet, provided TRPA makes the following findings in Section 37.7:

- For tourist accommodation buildings: findings 1, 2, and 3;
- For public service buildings: findings 1, 2, 3, and 4; and
- For certain recreation uses, including downhill ski facilities, cross country skiing facilities, or recreation uses whose primary recreation use is participant sports facilities, recreation centers, or sport assembly: findings 1, 2, 3, 4, and 7.

- B. Additional Building Height for Reduced Land Coverage

The maximum building heights specified in Table 37.4.1-1 may be increased for reductions in the amount of land coverage otherwise permitted within a project area pursuant to Chapter 30: Land Coverage. The maximum building heights may be increased by one foot for each onsite reduction in land coverage equal to five percent of the base allowable land coverage, or existing land coverage, whichever is greater, up to a limit of four additional feet, but not to exceed a maximum height of 42 feet, if TRPA makes findings 2, 3, and 5 in Section 37.7.

- C. Additional Building Height for Public Service and Certain Recreation Buildings That Are Not Visible From Lake Tahoe and That Are Not Located Within or Are Not Visible From Designated Scenic Highway Corridors

The maximum building heights specified in Table 37.4.1-1 may be increased by up to eight feet, but not to exceed a maximum of 42 feet, if the building will not be visible from Lake Tahoe and the building is not located within a TRPA-designated scenic highway corridor pursuant to Section 66.2: Establishment of Scenic Highway Corridors, provided TRPA makes findings 1, 3, 4, 7, and 8 in Section 37.7. An additional two feet, not to exceed a maximum of 42 feet, may be earned if the building meets the criteria and findings set forth above and is not visible from a TRPA-designated scenic highway corridor pursuant to Section 66.2.

- D. Additional Building Height for Certain Recreation Buildings Within Adopted Ski Area Master Plans

The maximum building heights specified in Table 37.4.1-1 may be increased if the buildings are identified in an adopted ski area master plan, are not visible from Lake Tahoe, are not located within or visible from designated scenic highway corridors and designated bikeways and recreation sites identified in the Lake Tahoe Scenic Resource Evaluation, and provided TRPA makes findings 1, 3, 4, 7, and 8 in Section 37.7. Additional height shall be calculated as follows:

- The maximum height in Table 37.4.1-1 may be increased by up to 14 feet, but not to exceed a total building height of 56 feet, provided that the project proponent demonstrates that expected snow depths in the area of the building site make the additional height necessary for the function of the building. The amount of additional height shall not exceed the ten-year

37.5. ADDITIONAL HEIGHT FOR CERTAIN BUILDINGS

TRPA may approve building heights greater than those set forth in Section 37.4, in accordance with the following provisions and provided that TRPA makes the applicable findings in Section 37.7:

37.5.1 Approval of Building Heights Greater Than 20 Feet

Building heights greater than 20 feet may be approved if the project is in compliance with the standards in Section 66.2: Scenic Quality Standards and TRPA makes the findings specified below. If, in any case, the TRPA is unable to make the required findings, maximum building height shall be limited to that height for which the required findings can be made.

A. Additional Height for Roof Pitch of Up to 5:12

Building heights greater than 20 feet, up to the maximums set forth in Table 37.4.1-1, for a roof pitch of up to 5:12, may be approved if TRPA makes findings 1 as set forth in Section 37.7.

B. Additional Height for Roof Pitch Greater Than 5:12

Building heights greater than 20 feet, up to the maximums set forth in Table 37.4.1-1, for a roof pitch of greater than 5:12, may be approved for residential buildings if TRPA makes findings 1, 2, and 3 as set forth in Section 37.7, and for other buildings if TRPA makes findings 1, 2, 3, and 5 as set forth in Section 37.7.

37.5.2 Additional Building Height for Public Service, Tourist Accommodations, and Certain Recreation Buildings

TRPA may approve building heights greater than those set forth in Section 37.4, for buildings whose primary use is public service, tourist accommodation, or certain recreation uses as follows:

Example Table for each sub-area by sub-district that must be added to Draft Area Plan EIR/EIS to provide clarity to the public/agencies and insure accurate and extensive environmental analysis is completed.

20.703.080 South Shore Area Plan development standards (Table).

Development Standards	T-T/HDT Overlay (High Density Tourist District)	T-MU/TC Overlay (Lower Kingsbury)	T-RR (Edgewood Mountain Parcel)	T-R (Edgewood Golf Course and Lodge)
Height (maximum) [1]	197 feet[2] /95 feet	56 feet	42 feet	42 feet/60 feet [7]
Density, Single-Family Residential [8]	1 unit per parcel (parcels less than one acre) 2 units per parcel (parcels greater than or equal to one acre)			
Density, Multiple-Family Residential (maximum) [8]	25 units/acre	25 units/acre	15 units/acre	15 units/acre
Density, Multi-person, nursing and personal care, and residential care [8]	25 units/acre	25 units/acre	25 units/acre	25 units/acre
Density, Tourist (maximum) [6] [8]	40 units/acre	40 units/acre	40 units/acre	250 units for site
Density, Recreation [8]	Developed campgrounds - 8 sites /acre Recreation vehicle sites - 10 sites/acre Group facilities - 25 persons/acre			
Front Yard Setback (feet) [3] [5]	25' (from Hwy 50)	25' (from Hwy 50 and S.R. 207)	25'	25'
Rear Yard Setback (feet) [3] [5]	25' (from Lake Parkway)	25'	25'	25'
Side Yard Setback (feet) [4] [5]	0'	0'	25'	25'
Side Yard Setback, Street Side (feet) [5]	25' (from Lake Parkway)	25'	25'	25'
Minimum Parcel Size (square feet)	10,000	10,000	20,000	20,000
Land Coverage (maximum)	Per Section 30.4 of the TRPA Code of Ordinances. High Capability Lands in the T-T/HDT Overlay and T-MU/TC Overlay zoning districts may be covered up to 70%.			
[1] Structures must not project above the forest canopy, ridge lines, or otherwise detract from the viewshed, except as permitted within the T-T/HDT and T-MU/TC Overlay zoning districts. For structures within the T-MU/TC Overlay zoning district that are over three stories, the findings in Section 37.7.16 of the TRPA Code of Ordinances must be met. Eighty percent of structures fronting Highway 50 within the T-T/HDT Overlay zoning district shall not exceed 56 feet in height when an existing building or buildings are being replaced within 100 feet of the right-of-way. See DCDGIS Manual, Part I, Division 7, South Shore Design Standards and Guidelines and TRPA Code of Ordinances for additional height requirements.				
[2] Limited to replacement structures, provided, the structures to be demolished and replaced are an existing casino hotel, with existing structures of at least eight stories, or 85 feet of height as measured from the lowest point of natural grade. Such structures shall also comply with Section 37.7.17 of the TRPA Code of Ordinances.				
[3] Setbacks from major roadways (Highway 50, S.R. 207, and Lake Parkway) shall be measured from the back of curb line. All other setbacks shall be measured from property lines.				
[4] Setbacks between structures must conform to International Building Code requirements.				
[5] Projections, including roof overhangs and eaves, porte coheres, decks, stairs and stairway landings, awnings, oriel and bay windows, and canopies, may encroach up to 20 percent into a setback as long as the projection conforms to International Building				

The Draft Area Plan EIR/EIS must provide scenic simulations of both the Tahoe City Lodge and Kings Beach Design Center Concept sites with maximum height, varied height, maximum density and maximum coverage allowed per the TRPA code allowing the public/agencies to adequately comment and insure environmental analysis and code compliance is accurately addressed.

Redevelopment Incentives for Town Centers: Page 17 Land Use Plan: page 87 bottom of the page
 Environmental improvements are identified and Code standards applied in accordance with the Regional Plan. The following are important requirements for Area Plan approval:

- Identify and support environmental improvement projects.
- Direct development away from stream environment zones.
- Require that projects in disturbed stream environment zones reduce coverage and enhance natural systems.
- Include site and building design standards addressing ridgeline and viewshed protection.
- Require variations in building height and transitional height limits adjoining properties outside Town centers

The Draft Area Plan EIR/EIS must provide a list of EIP projects that will be expected to be supported and require environmental maintenance of those projects.

The Draft Area Plan EIR/EIS must provide where Placer County plans to restore SEZ in support of Policy WQ-3.3.

The Draft Area Plan EIR/EIS must provide detailed information showing Placer maintains a mitigation fee program to finance activities that mitigate water quality impacts of development activities per WQ-3.4

WQ-3.3 UNITS OF LOCAL GOVERNMENT, STATE TRANSPORTATION DEPARTMENTS, U.S. FOREST SERVICE AND OTHER IMPLEMENTING AGENCIES SHALL RESTORE 25 PERCENT OF THE SEZ LANDS (FROM THE 1983 BASELINE) THAT HAVE BEEN DISTURBED, DEVELOPED, OR SUBDIVIDED IN ACCORDANCE WITH THE ENVIRONMENTAL IMPROVEMENT PROGRAM.

Stream Environment Zones have many beneficial effects on water quality, vegetation, scenic, wildlife and fisheries thresholds. The development of Stream Environment Zones in the Tahoe Region has adversely affected water quality, in many cases permanently. Stream Environment Zone restoration is a cost-effective policy for improving water quality and other thresholds and is a priority for the Environmental Improvement Program as well as TRPA policies and ordinances.

TRPA Regional Plan | CHAPTER 2: LAND USE ELEMENT
Adopted – December 12, 2012 | Page 2-37

WQ-3.4 IN ADDITION TO OTHER POLICIES AND REGULATIONS THAT ARE INTENDED TO MINIMIZE WATER QUALITY IMPACTS OF DEVELOPMENT ON-SITE, MAINTAIN MITIGATION FEE PROGRAMS TO FINANCE ACTIVITIES THAT MITIGATE THE WATER QUALITY IMPACTS OF DEVELOPMENT ACTIVITIES. THE MITIGATION FEE PROGRAMS SHALL REFLECT DIRECT AND INDIRECT WATER QUALITY IMPACTS AND BENEFITS RESULTING FROM DIFFERENT TYPES OF DEVELOPMENT AND REDEVELOPMENT ACTIVITIES, AS WELL AS GEOGRAPHIC DIFFERENCES.

The Draft Area Plan EIR/EIS must provide criteria that will demonstrate the measurement of enhancement to disturbed SEZs.

The Draft Area Plan EIR/EIS must provide criteria that will demonstration ridgeline and viewshed protections.

Redevelopment Incentives for Town Centers: Page 17 Land Use Plan: page 87 bottom of the page

- Require variations in building height and **transitional height limits** adjoining properties outside Town centers

The Draft Area Plan EIR/EIS must provide detailed criteria/diagram where transitional heights are expected to be located and note height limitations that will coincide in Tahoe Vista and Carnelian Bay as the North Tahoe West sub-area is adjoined to the Kings Beach Town Center as well West Shore sub-area adjoined to the Tahoe City Town Center and provide environmental analysis of transitional heights for potential scenic, etc. impacts.

Redevelopment Incentives for Town Centers: Page 17 Land Use Plan: page 87 bottom of the page

- **Include an integrated community strategy for coverage reduction and enhanced stormwater management.**

The Draft Area Plan EIR/EIS must provide the integrated community strategy documentation for coverage reduction and enhanced stormwater management documentation to allow for public/agencies to comment on its efficacy and applicability to threshold gain.

Demonstrate that all development activity within Town Centers will provide for and not interfere with Threshold Gain.

The Draft Area Plan EIR/EIS must provide detailed environmental analysis and a Table by threshold demonstrating development activity within the Town Centers does not interfere with, but achieves threshold gain as stated in RPU Goals and Policies.

LU-4.8 IN ORDER TO BE FOUND IN CONFORMANCE WITH THE REGIONAL PLAN, ALL AREA PLANS SHALL INCLUDE POLICIES, ORDINANCES AND OTHER IMPLEMENTATION MEASURES TO:

- 1) Identify zoning designations, allowed land uses and development standards throughout the plan area.
- 2) Be consistent with all applicable Regional Plan policies, including but not limited to the regional growth management system, development allocations and coverage requirements.
- 3) Either be consistent with the Regional Land Use Map or recommend and adopt amendments to the Regional Land Use Map as part of an integrated plan to comply with Regional Plan policies and provide threshold gain.
- 4) Recognize and support planned, new, or enhanced Environmental Improvement Projects. Area Plans may also recommend enhancements to

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planned, new, or enhanced Environmental Improvement Projects as part of an integrated plan to comply with Regional Plan Policies and provide threshold gain.

- 5) Promote environmentally beneficial redevelopment and revitalization within Centers.
- 6) Preserve the character of established residential areas outside of Centers, while seeking opportunities for environmental improvements within residential areas.
- 7) Protect and direct development away from Stream Environment Zones and other sensitive areas, while seeking opportunities for environmental improvements within sensitive areas. Development may be allowed in disturbed Stream Environment Zones within Centers only if allowed development reduces coverage and enhances natural systems within the Stream Environment Zone.
- 8) Identify facilities and implementation measures to enhance pedestrian, bicycling and transit opportunities along with other opportunities to reduce automobile dependency.

- LU-4.9 IN ORDER TO BE FOUND IN CONFORMANCE WITH THE REGIONAL PLAN, ALL AREA PLANS THAT INCLUDE TOWN CENTERS OR THE REGIONAL CENTER SHALL INCLUDE POLICIES, ORDINANCES AND OTHER IMPLEMENTATION MEASURES TO:
- 1) Address all requirements of *Policy LU-4.8*.
 - 2) Include building and site design standards that reflect the unique character of each area, respond to local design issues and consider ridgeline and viewshed protection.
 - 3) Promote walking, bicycling, transit use and shared parking in town centers and the Regional Center, which at a minimum shall include continuous sidewalks or other pedestrian paths and bicycle facilities along both sides of all highways within town centers and the Regional Center, and to other major activity centers.
 - 4) Use standards within town centers and the Regional Center addressing the form of development and requiring that projects promote pedestrian activity and transit use.
 - 5) Ensure adequate capacity for redevelopment and transfers of development rights into town centers and the Regional Center.
 - 6) Identify an integrated community strategy for coverage reduction and enhanced stormwater management.
 - 7) Demonstrate that all development activity within town centers and the Regional Center will provide threshold gain, including but not limited to measurable improvements in water quality.

Mixed Use Zoning Page 18 Land Use Plan: page 88 bottom of the page

Consistent with the Regional Plan, residential and mixed uses will be allowed in existing commercial districts. **These centrally located areas were changed from Commercial to Mixed-Use in the 2012 Regional Plan.** This amendment will allow housing in proximity to employment and multi-modal transportation facilities. Over time, this will reduce automobile dependency, improve air quality, and accelerate redevelopment and BMP installation.

The Regional Plan changed the nomenclature but did not analyze mixed-use outside town centers. The NOP and staff presenters and consultant consistently state that the outside town center sub-areas are governed by TRPA code and existing Plan Area Statements. The Plan Area Statements from the 1987 Plan did not analyze mixed-uses. The Draft Area Plan EIR/EIS must provide detailed analysis/criteria for the changes that are allowed with mixed-uses outside Town Centers where the mixed-use code is applicable and demonstrate no environmental impacts.

Revised Parking Regulations Page 18 Land Use Plan: page 88 bottom of the page

The Area Plan modifies parking standards to reduce minimum parking in some cases, promote shared parking, and consider the future development of parking assessment districts and/or in-lieu payment systems. **Amendments were developed as part of a comprehensive parking study and are consistent with Regional Plan parking amendments, including TRPA Code Section 13.5.3.B.2 encouraging alternative parking strategies.** Future development of parking assessment districts and/or in-lieu payment systems may also involve amendments to this Area Plan. Reductions in minimum parking standards and shared parking options are intended to reduce land coverage and make more efficient use of land for parking and pedestrian uses. **Future consideration of parking assessment districts and/or in-lieu systems would further consolidate parking and reduce vehicle trips.**

The Draft Area Plan EIR/EIS must provide detailed analysis/maps of each sub-areas parking standards to allow the public/agencies to comment on each sub-area needs- not just the Town Centers. Include diagram and list of where shared parking is proposed. The Draft Area Plan EIR/EIS must include/analyze the March 2015 North Tahoe Parking Study prepared by LSC

Transportation Consultants as its findings are being used for parking standards in the proposed Area Plan. List the amendments developed as part of the parking study to allow the public/agencies to accurately comment and insure extensive environmental analysis is completed. March 2015 parking study link below

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/Parking%20Study%20Final%20Report.pdf>

The Draft Area Plan EIR/EIS must provide diagrams and environmental, scenic and financial feasibility analysis for any proposed parking structures in the Placer County Area Plan boundary.

Gordon Shaw of LSC Consultants commented at a 2015 NTRAC meeting that he does not agree with the EPS Economic Development Report (provided as reference material) that structured parking is needed on the North Shore. The EIR/EIS must provide detailed parking analysis and environmental impacts related to surface versus structured parking.

The Draft Area Plan EIR/EIS must provide detailed analysis/criteria of what a parking district make-up would be and cost analysis to individual businesses. Provide a list/diagram of proposed parking assessment district locations. Parking Assessment Districts may be financially infeasible as the businesses are already in bid assessment districts for snow-removal.

The Draft Area Plan EIR/EIS must provide financial analysis for what is needed for an in-lieu program in support of developing and ultimate installation of on-the-ground parking based on accurately assessed parking demand/needs. If it takes years to get enough money in the in-lieu pool no environmental gain is achieved. Provide detail/criteria of the in-lieu fee parking program for public/agencies comment.

Example of a potential flaw for reduction of parking is the Martis Camp Beach Shack and any other proposed similar private amenity as parking needs are based on PAOTS granted. The Draft Area Plan EIR/EIS must provide parking demand information/table based on PAOTs allocation.

Site and Building Standards for Mixed Use Districts

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The Area Plan implements new site and building design standards for Town Centers and **other Mixed Use areas**, including lot standards, building placement standards, building height and form standards, and site design standards.

The Draft Area Plan EIR/EIS must disclose/list all “other Mixed Use areas” allowing the public/agencies to comment on those other areas for site and building standards. Current maps provided in the NOP include the following areas as Mixed-use: The Town Centers of Kings Beach and Tahoe City as well as outside of town centers: North Tahoe West, North Stateline and West Shore. Provide detailed criteria for the differences between mixed-use in Town Centers and outside Town Centers as environmental analysis of all mixed-use areas will be required as the mixed-use overlay will allow additional incentives that were not analyzed in the Plan Area Statements in the 1987 Regional Plan.

Site and Building Standards for Mixed Use Districts

Page 18 Land Use Plan: page 88 bottom of the page

Standards address all Regional Plan requirements and focus on improving scenic conditions and enhancing pedestrian facilities. The standards incorporate, modernize and supplement existing provisions of the Placer County Standards and Guidelines for Signage, Parking, and Design. **Implementation will improve scenic quality** and promote alternative modes of transportation.

The Draft Area Plan EIR/EIS must provide scenic analysis for all sub-areas identified as mixed-use (not just Town Centers) applying Regional Plan standards for height and density against the current on-the-ground baseline development. Provide detailed environmental analysis/criteria and simulations demonstrating scenic conditions will improve. Provide a list and diagram showing location of proposed enhanced pedestrian facilities.

Design Standards for Landscaping, Lighting and Signs

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The Area Plan updates Regional Plan design standards and guidelines for landscaping, lighting and signs. Changes primarily involve modernizing the document format, graphics and references. There is also a new requirement for fully-shielded outdoor lighting fixtures. This is primarily a formatting amendment to existing design standards. New TRPA dark sky lighting requirements are not fully addressed in the existing plans, so **conforming amendments are included. Implementation will improve scenic quality.**

The Draft Area Plan EIR/EIS must provide detailed criteria and a list of all amendments required to adhere to TRPA lighting and dark skies ordinances. Provide detailed scenic analysis that demonstrates scenic quality will improve with implementation of amendments.

Limited Conversion of CFA to TAU Page 19 of Land Use Plan page 89 bottom of the page

The Area Plan establishes a pilot program for the limited conversion of CFA to TAUs for existing development (held by property owners) and for the CFA supply held by Placer County. The program builds upon the conversion standards currently being developed for the TRPA pool of CFA and Tourist Bonus Units. Limitations include:

- Converted units may only be used in Placer County Town Centers;
- Sites must have BMP Certificates;
- Sites must have sidewalk access;
- Sites must be within ¼ mile of a transit stop;
- No more than 400 additional TAUs may be established in Placer County through this pilot program and other actions combined; and,
- **The program will be periodically monitored for efficacy, possible extension and consideration of program adjustments.**

The conversion rate is consistent with the conversion rate being developed by TRPA for bonus units: 1 TAU = 454 square feet of CFA.

This amendment is needed because the current supply of TAUs in Placer County is insufficient to accommodate redevelopment projects with new lodging units, creating a barrier to environmental development. **Studies have shown that there is a land use imbalance in the Area Plan, primarily involving a shortage of lodging compared to visitation levels and other uses. The current pattern of visitors staying outside the Tahoe basin and driving to and from activities at Lake Tahoe is environmentally and economically impactful.**

This amendment recognizes the uneven distribution of commodities and allows Placer County to **establish a more balanced land use pattern over time**. It promotes redevelopment of Placer County's Town Centers, which will improve environmental conditions and support the local economy.

The Draft Area Plan EIR/EIS must provide list/criteria and environmental analysis for possible program adjustments.

The Draft Area Plan EIR/EIS must provide the studies that have shown there is a land use imbalance. Provide detailed criteria of what constitutes the imbalance.

The Draft Area Plan EIR/EIS must provide detailed criteria for the determination that 400 additional TAU's are necessary. The February 2015 Economic Development Incentives for North Lake Tahoe Town Centers Report is more of a list with some narrative of ways to expedite development. It starts with an assumption: that we need to develop the Basin to raise prosperity to both attract and reward development and provide funds for environmental improvement. The EPS Report does not demonstrate that massive new development will in fact solve Tahoe's shoulder season problem which is kind of the purpose of the Placer analysis in the first place..

The Draft Area Plan EIR/EIS must provide environmental analysis for the 400 additional TAU's at buildout. Must provide an alternative comparison of 200 TAU's versus 400 and zero new TAUs for environmental benefits assessment as well as economic feasibility.

The Draft Area Plan EIR/EIS must include parking needs, scenic evaluation, water and air quality analysis based on 400 new TAU's on the North Shore. Provide detailed analysis and criteria demonstrating TAU's have less impact on the environment than CFA.

The Draft Area Plan EIR/EIS must analyze the findings of Economic Development Incentives for North Lake Tahoe Town Centers Feb 2015 study as it is used for the basis of many of the recommendations for Area Plan Programs outlined in the NOP.



The Draft Area Plan EIR/EIS must provide detailed environmental analysis for the proposed increase of TAUs as the policy below DP 2.2 clearly states what was analyzed in the Regional Plan Update.

DP-2.2 THE MAXIMUM AMOUNT OF RESIDENTIAL ALLOCATIONS, COMMERCIAL FLOOR AREA, TOURIST BONUS UNITS AND RESIDENTIAL BONUS UNITS THAT MAY BE RELEASED BEFORE DECEMBER 31, 2032 IS OUTLINED IN THE TABLE BELOW.

ALLOCATION AND DEVELOPMENT RIGHTS ACCOUNTING ^a			
ALLOCATIONS/ DEVELOPMENT RIGHTS	USED 1987-2012	REMAINING FROM 1987 PLAN ^b	2013 ADDITIONS
Residential Allocations	5,973	114	2600
Residential Bonus Units	526	874	600 ^c
Tourist Bonus Units	58	342	0
Commercial Floor Area (Total square feet)	416,421	383,579	200,000 ^d
Placer County	128,623	72,609	
Washoe County	87,906	2,000	
Douglas County	45,300	36,250	
El Dorado County	15,250	36,150	
City of South Lake Tahoe	77,042	52,986	
TRPA Special Project and CEP Pool	62,300	183,384	

^aNote 1: 158,815 sq. ft. of Commercial Floor Area, 245 Residential Bonus Units and 90 Tourist Bonus Units have been reserved or allocated to projects (e.g., Community Enhancement Projects) that have not been permitted or permitted but not built, are accounted for in the "Remaining from 1987 Plan" column. The 114 remaining residential allocations were distributed to local governments in 2011 and 2012, but have not been built.

^bNote 2: 600 Residential Bonus Units shall be used only in Centers.

^cNote 3: 200,000 sq. ft. of CFA shall only be made available after the 383,579 sq. ft. of remaining CFA is exhausted.

^dNote 4: The columns "Used 1987-2012" and "Remaining from 1987" are estimates and not regulatory.

REMAINING 1987 ALLOCATIONS ARE AVAILABLE FOR USE IN ACCORDANCE WITH REGIONAL PLAN AND CODE OF ORDINANCE PROVISIONS. SUBJECT TO COMPLIANCE WITH REGIONAL PLAN POLICIES AND CODE OF ORDINANCES INCLUDING NOTE 3 ABOVE, TRPA WILL MAKE AVAILABLE UP TO 20 PERCENT OF THE 2013 RESIDENTIAL AND COMMERCIAL LAND USE ALLOCATIONS EVERY FOUR YEARS, IN CONJUNCTION WITH THE 2012 REGIONAL PLAN UPDATE AND FUTURE UPDATES OF THE REGIONAL PLAN AND RTP.

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Included in the analysis and requirements of the CFA to TAU conversion pilot program: require and specify that monitoring of the program will be reported annually to the TRPA. Reporting must include how many square feet of CFA have been converted to TAU's and environmental impacts or benefits with the associated projects. Add that to qualify for the conversion from CFA to TAU the new TAU project must contribute to an EIP or restore SEZ on the North Shore.

Staying in the Lake Tahoe basin does not stop visitors from driving to and from other locations in the Tahoe basin. Until public transportation adequately addresses the needs of locals as well as visitors- people will drive to destinations. The Draft Area Plan EIR/EIS must provide a study/environmental analysis demonstrating staying inside versus outside the Tahoe Basin has less environmental impact. To initially arrive at the Tahoe Basin people must drive here. Public transportation does not offer flexibility for the tourist to get on and off a bus nor does it allow enough lead-time or frequency for the local workforce.

The Draft Area Plan EIR/EIS must provide detailed environmental analysis demonstrating over time (how much time?) that providing more TAU and less commercial is environmentally beneficial. Develop a policy and provide incentives for a TAU project to be relocated from Tahoe Vista to a Town Center and require site restoration to provide additional open space in a non-Town Center sub-area as Tahoe Vista has more TAU's per capita than the Town Centers.

Tourist Accommodations

Land for tourist accommodations makes up 0.1 percent (75 acres) of land in the Plan Area and consists of hotels, motels and resorts/timeshares. The majority of tourist accommodation land is located in Tahoe Vista (53 percent), followed by Kings Beach (18 percent) and Tahoe City (15 percent). In Tahoe Vista and Kings Beach tourist accommodations are located along SR 28 and consist of one- and two-story motel type buildings. In Tahoe City tourist accommodations are located along SR 28, clustered near the "Wye" and Granlibakken Resort.

Non-Contiguous Project Areas in Town Centers

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This program allows a project site to include non-contiguous parcels within Town Centers. To utilize this program, all project components must be located on developed land in a mixed use zoning district within a Town Center, and all applicable development standards still apply. Projects utilizing this option will require TRPA approval.

Placer County's Town Centers are subdivided into small parcels, most of which have more land coverage than is currently allowed. Assembling a large enough project area can be a significant impediment to redevelopment. This amendment will allow property owners to assemble non-contiguous parcels for different project components, thereby accelerating redevelopment, BMP installation and related environmental benefits. A comparable ordinance was used in the South Lake Tahoe Redevelopment Plan Area.

The Draft Area Plan EIR/EIS must provide additional detailed criteria for the Non-contiguous Project Area in Town Centers which can be translated into environmental analysis requirements i.e. sites must have completed BMPs as they are required to be on developed land, one-site should not be entirely for parking needs, determine/establish maximum distance between sites, determine/establish maximum number of non-contiguous sites allowed for a single project, etc.

Secondary Residences Page 20 Land Use Plan: page 90 bottom of the page

This program expands upon TRPA Code Section 21.3.2 to allow market-rate secondary residences on certain residential parcels less than one acre in size, subject to BMP certificates, TRPA code requirements (including allocations), and supplemental design standards. To qualify for the program, properties must be located within one-quarter mile of a mixed use zoning district or primary transit route (see Figure 4-8). Secondary residences may not be used as tourist units or converted to TAUs.

To qualify for the program, properties must be located within one-quarter mile of a mixed use zoning district or primary transit route (see Figure 4-8). Secondary residences may not be used as tourist units or converted to TAUs.

The Draft Area Plan EIR/EIS must provide a detailed list/criteria for the properties by sub-area that qualify for secondary residences. Figure 4.8 is impossible to read- provide maps by mixed-use sub-district and sub-area and show where sites are located. Most areas are considered mixed-use- identify what areas do not qualify for secondary residential units.

Add that secondary residences cannot be converted to commercial floor area.

4.5 Land Use Diagram Page 21 Land Use Plan: page 91 bottom of the page

The Area Plan Land Use Diagram (Figure 4-5) depicts the Regional Plan land use designations and Town Centers, along with Village Centers identified by this Area Plan. More detailed zoning maps are included in the Area Plan Implementing Regulations.

REGIONAL PLAN LAND USE DISTRICTS

Regional Plan Policy LU-4.1 describes land use designations and acceptable uses as follows:

LU-4.1: THE REGIONAL PLAN LAND USE MAP IDENTIFIES GROUPINGS OF GENERALIZED LAND USES AND PRIORITY REDEVELOPMENT AREAS IN THE REGION. AREAS OF SIMILAR USE AND CHARACTER ARE MAPPED AND CATEGORIZED WITHIN ONE OR MORE OF THE FOLLOWING EIGHT LAND USE CLASSIFICATIONS: WILDERNESS, BACKCOUNTRY, CONSERVATION, RECREATION,

RESORT RECREATION, RESIDENTIAL, MIXED-USE, AND TOURIST. THESE LAND USE CLASSIFICATIONS SHALL DICTATE ALLOWABLE LAND USES. EXISTING URBANIZED AREAS ARE IDENTIFIED AS CENTERS AND INCLUDE TOWN CENTERS, THE REGIONAL CENTER AND THE HIGH DENSITY TOURIST DISTRICT. CENTERS ARE THE AREAS WHERE SUSTAINABLE REDEVELOPMENT IS ENCOURAGED.

Since the development permitted under this plan is generally limited to the existing urban boundaries in which uses have already been established, the concept of this land use plan is directed toward encouraging infill and redirection. The intent of this system is to provide flexibility when dealing with existing uses, continuation of acceptable land use patterns, and redirection of unacceptable land use patterns. Implementation regulations set forth the detailed management criteria and allowed uses for each land use classification.

This Area Plan includes Conservation, Backcountry, Recreation, Residential, Mixed Use and Tourist districts, along with the Tahoe City, Kings Beach and North Stateline Town Centers. Not included in the Plan are Wilderness, Resort Recreation, Regional Centers or High Density Tourist Districts. Policy LU-4.1 describes the districts as follows.

The Draft EIR/EIS must provide map location in the Draft Area Plan EIR/EIS for future possibility (identified project is Martis Valley West) Resort Recreation as there will be cumulative impacts associated with any proposed project with a Resort Recreation overlay. The Marits Valley West parcel is located in Placer County and must be held accountable for cumulative impacts within the Tahoe Basin. Develop policies for Resort Recreation

VILLAGE CENTERS Page 23 Land Use Plan: page 93 bottom of the page

The smaller Village Centers of Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista contain a variety of uses but are not identified in the Regional Plan or eligible for its Town Center incentives.

Village Centers face many of the same challenges as the larger Town Centers, including development in SEZs, excess land coverage, scenic non-attainment ratings and a general need for property upgrades.

This Area Plan encourages redevelopment in the Village Centers and implements the programs that are allowed under the Regional Plan. Area Plan programs that apply in the Village Centers include mixed use zoning, revised parking regulations, new design standards and secondary dwelling units. Also included are plans to complete trail connections, enhance transit service, and advocate for additional redevelopment incentive programs in the Regional Plan.

The Draft Area Plan EIR/EIS must disclose and provide a list of the programs that are allowed in the Regional Plan that apply to Village Centers to insure the proper level of environmental analysis is completed in the EIR/EIS where changes to baseline conditions will occur with the mixed-use overlay for new or re-developed properties. The criteria for changes in the non-Town Centers triggers the requirement for analysis as the baseline conditions will be changed.

The Draft Area Plan EIR/EIS must provide a list of trail connections proposed to be completed along with a timeline for completion.

The Draft Area Plan EIR/EIS must provide information/diagram on where transit will be enhanced in the Area Plan boundary.

The Draft Area Plan EIR/EIS must disclose and provide a list/criteria of proposed additional redevelopment incentive programs being considered that were not analyzed in the Regional Plan Update and complete environmental analysis of proposed programs.

The Draft Area Plan EIR/EIS must provide detailed criteria and environmental analysis as prescribed by The Lake Tahoe Basin Scenic Resource Evaluation, The 1982 Travel Route Ratings of the Scenic Thresholds and Scenic Quality Improvement Plan that demonstrates compliance of scenic thresholds per policies SR-1.1, SR-1.2 and SR-1.3.

POLICIES:

SR-1.1 ALL PROPOSED DEVELOPMENT SHALL EXAMINE IMPACTS TO THE IDENTIFIED LANDSCAPE VIEWS FROM ROADWAYS, BIKE PATHS, PUBLIC RECREATION AREAS, AND LAKE TAHOE.

The impact of development on the landscape views and scenic qualities of the Tahoe Region should be considered as part of the project review process. Conditions should be placed on project approval in a manner capable of mitigating any likely impacts. Impacts shall be evaluated against specific management directions provided for each identified landscape view in the *Lake Tahoe Basin Scenic Resource Evaluation, 1983, Wagstaff and Brady*. In addition, the Scenic Quality Improvement Program (SQIP, adopted September, 1989) and *Design Review Guidelines for Scenic Quality (September, 1989)* are to provide direction for the design, review, and implementation of projects reviewed from identified roadways, bike paths, public recreation areas, and Lake Tahoe.

SR-1.2 ANY DEVELOPMENT PROPOSED IN AREAS TARGETED FOR SCENIC RESTORATION OR WITHIN A UNIT HIGHLY SENSITIVE TO CHANGE SHALL DEMONSTRATE THE EFFECT OF THE PROJECT ON THE 1982 TRAVEL ROUTE RATINGS OF THE SCENIC THRESHOLDS.

Projects proposed in areas sensitive to scenic degradation shall be analyzed to ensure that the scenic quality of the area is maintained or improved.

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SR-1.3 THE FACTORS OR CONDITIONS THAT CONTRIBUTE TO SCENIC DEGRADATION, AS SPECIFIED IN THE SCENIC QUALITY IMPROVEMENT PROGRAM (SQIP), NEED TO BE RECOGNIZED AND APPROPRIATELY CONSIDERED IN RESTORATION PROGRAMS, PLAN DEVELOPMENT, AND DURING PROJECT REVIEW TO IMPROVE SCENIC QUALITY.

OPEN SPACE Pages 23/24 Land Use Plan: page 93/94 bottom of the page

The Area Plan calls for the **maintenance and expansion of planned open spaces**, including public lands managed for environmental purposes, areas where additional development is not allowed (stream environment zones, steep slopes, etc.) and connections between these areas. In accordance with Regional Plan Policy CD-2.1, Area Plan requirements supplement Regional Plan Policies to **strategically identify areas where open spaces are planned to connect sensitive areas within Centers to undisturbed areas outside of Centers**. Examples include:

- Residential and Commercial uses are no longer allowed at the Tahoe City Golf Course, establishing an open space / recreation connection between the Town Center

and U.S. Forest Service lands to the north. Town Center development within the Tahoe City Golf Course Special Planning Area must also include SEZ restoration.

- To utilize Town Center incentives, properties within the Tahoe City Western Entry Special Planning Area shall provide public access and amenities along the river, thereby extending the Truckee River trail and open space corridor to the 64 acre park and Town Center.
- To utilize Town Center incentives, properties within the Kings Beach Entry Special Planning Area shall remove development from the Griff Creek floodplain and restore lands in the floodplain and other SEZ areas.
- Zoning for parks and beaches in Kings Beach is changed from mixed use to recreation.
- To utilize Town Center incentives, properties within the North Stateline Special Plan Area shall prepare a detailed Town Center plan addressing TRPA requirements, including for Open Space.

The Draft Area Plan EIR/EIS must provide a list of maintenance sites, proposed new open space plan and the proposed locations for open space throughout the Area Plan.

The Special Area designation is proposed for future planning or where additional environmental performance standards apply. The Draft Area Plan EIR/EIS must provide a list of environmental performance standards that are applicable and explain if the Special Area is designated for future planning and when the environmental analysis will be performed. Tiering from the Area Plan EIR/EIS will not be applicable as the project will not have been fully defined.

The Draft Area Plan EIR/EIS and Tahoe City Lodge Project must disclose/state that a new clubhouse building will be part of the recreation zoning for Tahoe City Golf Course and include environmental analysis for the new golf course club house and relocation of the putting green as well as winter ice skating area. Scenic analysis for the new golf course clubhouse must be provided as well as VMT analysis for proposed new uses (i.e. conference room addition)

The Draft Area Plan and Tahoe City Lodge EIR/EIS must provide detailed information/criteria of where open space is proposed to be located.

The County should be providing funding for some of the restoration of Griff Creek as materials have been stored for the KB Core Improvement project on the SEZ at SR 28 and Secline. Detailed environmental analysis and restoration of the disturbed Griff Creek SEZ must be included in the Draft Area Plan EIR/EIS.

The Draft Area Plan EIR/EIS must provide detailed information/list of beaches and parks recommended to be re-zoned from mixed-use to recreation. Provide environmental analysis of the proposed change for each of the beaches and parks in the Draft Area Plan EIR/EIS and ownership of the areas slated to be re-zoned (i.e. CTC, State Parks, Placer County). Provide a diagram showing location of sites to be re-zoned.

4.6 Town Center Plans Page 26 Land Use Plan page 96 bottom of page

The Town Center Plans for Tahoe City and Kings Beach share a number of objectives and plan designations, but maintain variations to reflect the unique character and setting of each community. Each Town Center Plan is heavily influenced by the Vision Plans that are summarized in the introduction to this Area Plan. Vision Plan priorities are reflected in the Area

Plan Implementing Regulations and the projects described in the Implementation Plan. The Town Center Plans are depicted on Figures 4-6 and 4-7.

The Draft Area Plan EIR/EIS must provide detailed environmental analysis of the Kings Beach and Tahoe City Vision Plans as assumptions have been based on content of visions plans as well as being referenced in the Implementing Regulations and Implementation Plan and the NOP (see above.)

Core and Transition Areas Page 26 of document page 96 bottom of page

Each Town Center has Core and Transition areas. Core areas are the center of each community with compact development, continuous sidewalks and improved public spaces. The full suite of Regional Plan incentives apply in these areas.

Transition Areas are located within walking distance of each Core area, but have lower intensity development patterns, incomplete sidewalk networks and fewer public spaces. In accordance with Regional Plan requirements, these areas have transitional building heights (3 stories) and requirements to complete sidewalk (or multi-use trail) connections to core areas prior to or concurrent with projects utilizing the Regional Plan redevelopment incentives.

Revise criteria for transition areas stating that 3 stories or less is applicable in transition areas in the Draft Area Plan EIR/EIS. 3 stories is not a mandatory requirement.

Placer County should not depend solely on development or redevelopment to create usable sidewalks in transition areas or trail connections. Other funding sources should be identified in the Draft Area Plan EIR/EIS (coordinate with the Tahoe Conservancy for trail connection funds) and a draft policy to seek other funding sources.

Town Center Zoning Page 26 Land Use Plan page 96 bottom of page

Town Centers include zoning districts for Mixed Use, Residential and Recreation areas. The zoning ordinances describe the allowed land uses in more detail. **Minor Regional Plan land use amendments are also included to be consistent with parcel lines and Town Center boundaries.**

The Draft Area Plan EIR/EIS must address Town Center zoning and include "Tourist" as a zoning district as it is not part of the mixed-use definition. Environmental analysis must be consistent with the zoning district stated.

The Draft Area Plan EIR/EIS must disclose and provide a list/criteria for "Minor Regional Plan land use amendments" and provide environmental analysis for the proposed amendments.

Any Town Center Boundary adjustment is not minor and must be day-lighted in the Draft Area Plan EIR/EIS and include all proposed zoning changes that are being considered along with the boundary adjustment and must be analyzed for environmental impacts.

Analysis must also be done at the project level and included in the Tahoe City City Lodge EIR/EIS where zoning changes are proposed.

7. **Mixed-Use (Formerly Commercial and Public Service Areas)**
Mixed-use areas are urban areas that have been designated to provide a mix of commercial, public services, light industrial, office, and residential uses to the region or have the potential to provide future commercial, public services, light industrial, office, and residential uses. The purpose of this classification is to concentrate higher intensity land uses for public convenience and enhanced sustainability. Any amendment to a plan area statement that is adopted after the adoption of this Code may retain the name of the Commercial and Public Services Area land use classification, however, Area Plans shall utilize the Mixed-use classification.

TRPA Code of Ordinances

Adopted by Governing Board December 12, 2012 | Amended January 28, 2015 | Page 11-3

CHAPTER 11: PLAN AREA STATEMENTS AND PLAN AREA MAPS

11.6 Content of Plan Area Statements

11.6.3 Special Designations

8. **Tourist**
Tourist areas are urban areas that have the potential to provide intensive tourist accommodations and services or intensive recreation. This land use classification also includes areas recognized by the Compact as suitable for gaming. These lands shall include:
- a. Areas already developed with high concentrations of visitor services, visitor accommodations, and related uses;
 - b. Lands of good to moderate land capability (land capability districts 4 – 7);
 - c. Lands with existing excess coverage; and
 - d. Areas located near commercial services, employment centers, public services, transit facilities, pedestrian paths, and bicycle connections.

Town Center Boundaries Page 27 Land Use Plan page 97 bottom of page

The Tahoe City Town Center boundary is modified to exclude about 3.4 acres at the Fairway Community Center and about 3.6 acres of restored SEZs along Highway 89 - and to include about 4.2 acres at the Tahoe City Golf Course clubhouse as a mixed use area subject to Special Planning Area requirements as outlined below. Areas excluded from the Town Center are primarily SEZ. Areas added are more suitable for development. The Kings Beach Town Center remains unchanged from the Regional Plan.

The Draft Area Plan EIR/EIS and Tahoe City Lodge Project must provide detailed environmental analysis/criteria for the proposed mixed-use overlay on lands currently zoned recreation and disclose The Tahoe City Lodge project is dependent on this mixed-use overlay to utilize acreage to allow for TAUs at 40 units per acre.

The Draft Area Plan EIR/EIS and Tahoe City Lodge Project must provide MOU documentation between Tahoe City Lodge and Golf Course to allow the public/agencies to determine if this is environmentally beneficial for both sites and the Town Center itself.

Lake Tahoe View Protection Page 27 Land Use Plan page 97 bottom of page

Protecting and enhancing views to Lake Tahoe is a high priority in the Plan area. The increased building heights authorized in Town Centers of this Plan are intended to provide capacity for development transfers and redevelopment, while at the same time encouraging enhancement of views to Lake Tahoe. TRPA findings require, among other items, that three and four-story buildings in Town Centers demonstrate “no net loss” of views to Lake Tahoe and other scenic resources. Implementing Regulations for this Area Plan expand upon the TRPA finding to require that any proposed four-story project on the Lake side of highways either maintain 35 percent of the site as open view corridors to Lake Tahoe, or if existing development does not comply, increase the width of open view corridors by ten percent or more.

The Draft Area Plan EIR/EIS must provide scenic simulations and environmental analysis demonstrating “no net loss” of views with three and four stories on the lake side as well as the mountain side of both Town Centers.

The Draft Area Plan EIR/EIS must provide scenic simulations of all three views (listed below) of three as well as four story buildings in and outside town centers for the entire Area Plan demonstrating that view-sheds have been enhanced.

(1) Upland scenic (2) views from the highway to the lake and (3) views from Lake Tahoe itself.

The Draft Area Plan EIR/EIS must provide diagrams (sample site plan) with examples for a 35% open space requirement (i.e a 100 ft wide parcel with a four story building on 65 ft with a remainder of 35% open space view). Define/provide criteria for “open space” view corridor in the Draft Area Plan EIR/EIS to provide clarity of the finding requirements and demonstration of open space views.

Special Planning Areas Pages 27/28 Land Use Plan page 97/98 bottom of page

Special Planning Areas are identified for more detailed future planning, or where additional environmental performance standards apply. Where applicable, performance standards may be addressed in a special plan for an area, or with individual projects. Special Planning areas include:

The Draft Area Plan EIR/EIS must provide a list of environmental performance standards that apply to special planning areas or individual projects enabling the public/agencies to comment on those standards for code compliance and environmental analysis and demonstration of threshold attainment.

The proposed Special Planning Areas are circumventing the planning process. Remove the analysis of all the Special Planning Areas from the Draft Area Plan EIR/EIS. These areas are for future planning or individual projects and should become future amendments to the Area Plan after it is approved. These areas have not been given adequate public visibility and if they are associated with an individual project then it must come forward as a separate environmental analysis of the specific project to insure accurate and extensive environmental analysis is completed. The Tahoe City and Kings Beach Vision Plans are not conclusive enough to have the public participation in those meetings qualify as adequate public input. Stating they were visions and not Special Planning Areas at the time is disingenuous and misleading.

1. Kings Beach Entry Special Planning Area. This Special Planning Area is located at the northern gateway to Kings Beach at the intersection of Highways 267 and 28. The Special Plan should address redeveloped project sites, scenic enhancements, coordinated site planning with public and private landowners, environmental improvements, and enhanced lake access. Area-wide water quality improvements and/or coverage management plans should be considered. Future Town Center boundary modifications may also be appropriate. The Kings Beach Fire Station, North Tahoe Beach, Secline Beach and Griff Creek are important community amenities. Redevelopment should complement these assets. Implementing Regulations for the area retain current development standards and

allow the use of Town Center incentives as part of a Special Plan. This is a scenic non-attainment area.

Special Planning Area #1 will require coordination/funding from Federal Highways/other, cooperation with CalTrans, possible relocation of the North Tahoe Fire Station, a gas station, tire store, easement from Brockway Golf Course and restoration of Griff Creek SEZ, coordination with CTC and private landowners, etc. Considering a Kings Beach Town Center Boundary modification/adjustment has not been given proper public visibility and should have its own process day-lighted and will require detailed environmental analysis. Special Planning Area #1 should be a stand-alone project or Area Plan and not analyzed in the Draft Area Plan EIR/EIS.

Any Town Center Boundary adjustment is not minor and must be day-lighted and include all proposed zoning changes that are being considered along with the boundary adjustment and must be analyzed for environmental impacts.

2. Tahoe City Western Entry Special Planning Area. This Special Planning Area is considered the western gateway to Tahoe City along Highway 89. In this area, riverfront restoration and public access is required if Town Center incentives are used. This is a prominent gateway to Lake Tahoe. The properties are developed with commercial and light industrial uses, including a Caltrans facility and lumber yard along the River frontage. This is a scenic non-attainment area.

Special Planning Area #2 will require possible relocation of the Caltrans facility, lumber yard and other light industrial uses. Coordination with other agencies will be required to provide public access and river restoration. The use of Town Center incentives has not been given proper public visibility and should have its own process day-lighted and will require detailed environmental analysis. Special Planning Area #2 should be a stand-alone project or Area Plan and not analyzed in the Draft Area Plan EIR/EIS.

3. Tahoe City Golf Course Special Planning Area. This area encompasses an area around the Tahoe City Golf Course clubhouse, where off-site SEZ restoration is required if Town Center incentives are used. This part of the Town Center boundary modifications is described above. It is intended to be used for public uses and shared use facilities with Town Center redevelopment projects.

Special Planning Area # 3 is complicated as the Tahoe City Lodge Project is dependent upon Special Area #3 approval. Independent analysis of the golf course and golf course with Tahoe City Lodge is most appropriate to insure accurate and extensive environmental analysis is completed. The BMP requirements for the golf course have been long past due and must be completed before the Tahoe City Lodge is approved. Adding the Tahoe City Lodge as part of the Area Plan has not been given proper public visibility and should have its own process day-lighted and will require detailed environmental analysis. Special Planning Area #3 should be a stand-alone project or Area Plan and not analyzed in the Draft Area Plan EIR/EIS.

4. North Stateline Special Planning Area. This area includes the North Stateline Town Center, where the requirements of TRPA Chapter 13 need to be addressed if Town Center incentives are used.

Special Planning Area #4 is not currently a Town Center until approved/analyzed as a Town Center. Special Planning Area #4 has not been given proper public visibility and should have its own process day-lighted and will require detailed environmental analysis. Special Planning Area #4 should be a stand-alone Area Plan and not analyzed in the EIR/EIS.

5. Truckee River Corridor Special Planning Area. This area includes the Truckee River Corridor from the Tahoe City Town Center to the Plan boundary near Alpine Meadows. This area will be reviewed with a goal of updating zoning and development standards to promote the environmental redevelopment and design improvements on non-residential properties.

Special Area # 5 needs to have clearly defined boundary lines (basin boundary) as well as all non-residential properties disclosed for analysis. Changing zoning and development standards will require detailed environmental analysis. Special Planning Area #5 and has not been given proper public visibility and should have its own process day-lighted. Special Planning Area #5 should be a stand-alone Area Plan and not analyzed in the EIR/EIS.

The North Tahoe West and West Shore Plans are not being fully analyzed in this Draft Area Plan EIR/EIS. Staff time and budget as well as over two years of selected volunteers' time and public input have been spent to date to lay a foundation for the analysis in the Area Plan. The Draft Area Plan EIR/EIS must provide a Table with details/criteria and prioritization of Special Areas future analysis and the sub-areas and sub-districts not fully analyzed.

The Draft Area Plan EIR/EIS must provide detailed environmental analysis demonstrating that the five special planning areas (if they remain in the Area Plan) achieve greater environmental benefits than others sub-areas and sub-districts not being fully analyzed

Town Center Opportunity Sites and Tahoe City Lodge Pilot Project

Page 28 Land Use Plan page 98 bottom of page

Key sites within the Town Centers of Tahoe City and Kings Beach are identified for future environmental redevelopment opportunities, as shown on Figures 4-9 and 4-10. The Kings Beach Center is a conceptual design for mixed-use environmental redevelopment and SEZ restoration on a 4-acre, 16 parcel site (the former BBLC County Redevelopment Agency site, along with a former County Redevelopment Agency site along the south side of North Lake Boulevard, and the existing County Kings Beach library site) and is analyzed at a programmatic level in the EIR/EIS.

The Kings Beach Center design concept includes hotel, commercial, professional office, government services, public plaza, and community park uses on the former County Redevelopment Agency sites, and removal and relocation of the existing County Kings Beach library and SEZ restoration of the site.

A second site in Tahoe City is a proposed redevelopment project, the Tahoe City Lodge, and

is analyzed as a pilot project in the EIR/EIS. The Tahoe City Lodge involves environmental redevelopment of the old "Henrikson" site with new tourist accommodations and amenities, as well as renovations to the Tahoe City Golf Course clubhouse. The EIR/EIS analysis and review of the Kings Beach Center opportunity site and the Tahoe City Lodge pilot project is intended to evaluate projects that may be built under this plan and promote future environmental redevelopment and revitalization of the Town Centers.

Analyzing key sites is taking away from analysis of other areas within the overall Area Plan that were studied for over two years only to be given a backseat to "Key sites and Special Planning Areas". Projects should be required to be analyzed separately from the overall Area Plan process to insure extensive and accurate environmental analysis is completed.

Placer County should consider going back to four Area Plans as enough information is available to create four distinct "Area Plans". TRPA does not require Placer County do just one gigantic Area Plan. Other jurisdictions have carved out smaller plan areas for analysis which clarified specific requirements, character/design standards, applicable code, etc. The City of South Lake Tahoe has two distinct Area plans

- 1). The Tourist Core and*
- 2). The Tahoe Valley (the wye) Area Plans to address the uniqueness of each "area".*

The Draft Area Plan EIR/EIS should include an alternative with the four sub-areas identified in the first NOP.

From Page 9 of the NOP

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCUpdate/DraftAreaPlan2015/NOP.pdf>

1.2.1 Tahoe City Lodge Pilot Project

PROJECT LOCATION

The approximately 3.1-acre Tahoe City Lodge Pilot Project site is situated east of the intersection of SR 28 and SR 89 near the western entrance to Tahoe City (Exhibit 1). The site is located at 255 and 265 North Lake Boulevard and includes Assessor Parcel Numbers (APNs) 094-070-001 and 094-070-002, which comprise approximately 1.4 acres. The project site also includes two existing easements on adjacent properties (a 0.5-acre easement from the Tahoe City Golf Course and a 0.1-acre easement from the parcel to the west of the project site) and 1.1 acres of the Tahoe City Golf Course.

The Tahoe City Lodge Site has 1.4 acres and will require approval of TC Golf Course inclusion into the Town Center for an additional 1.7 acres to achieve 40 units per acre density for the project.

Using TRPA's significantly different zoning processes, the Placer County General Plan amendment will be swept-up/confused with the TRPA Area Plan process.

The Draft Area Plan EIR/EIS and Tahoe City Lodge EIR/EIS must provide detailed information about the California General Plan amendment process as to how it relates to this Area Plan update approval and subsequent amendment to the Placer County General Plan. The previous environmental documentation for the Placer County General Plan was completed in July 1994.

The Tahoe City Lodge separate EIR/EIS must provide detailed environmental impact analysis of the Lodge as an individual project and cumulative impacts to the Area Plan.

The Draft Tahoe City Lodge project EIR/EIS must provide a Table with detailed certified financial accountability / transparency of what the Tahoe City Lodge Project and the Tahoe City (publically owned) Golf Course are paying for in the way of environmental analysis i.e. The Draft EIR/EIS for the Tahoe City Lodge Project, the environmental analysis of moving and constructing a new TCGC clubhouse and putting green, shared parking environmental analysis, Winter recreation activities on the golf course environmental analysis, conceptual site plans, any analysis solely applicable to the Tahoe City Lodge or Tahoe City Golf Course MOU to insure public funds for the Area Plan are not contributing to the projects separate analysis. By including and highlighting/focusing the NOP on the Tahoe City Lodge Project adds complexity and confusion to analyzing the Area Plan re-zoning and up-zoning. The proposed Tahoe City Town Center Boundary-line adjustment and the Tahoe City Golf Course Special Planning Area #3 environmental analysis cost should be bore by the Tahoe City Lodge/TCGC MOU partners as that analysis directly benefits the proposed Tahoe Lodge Project and Tahoe City Golf Course.

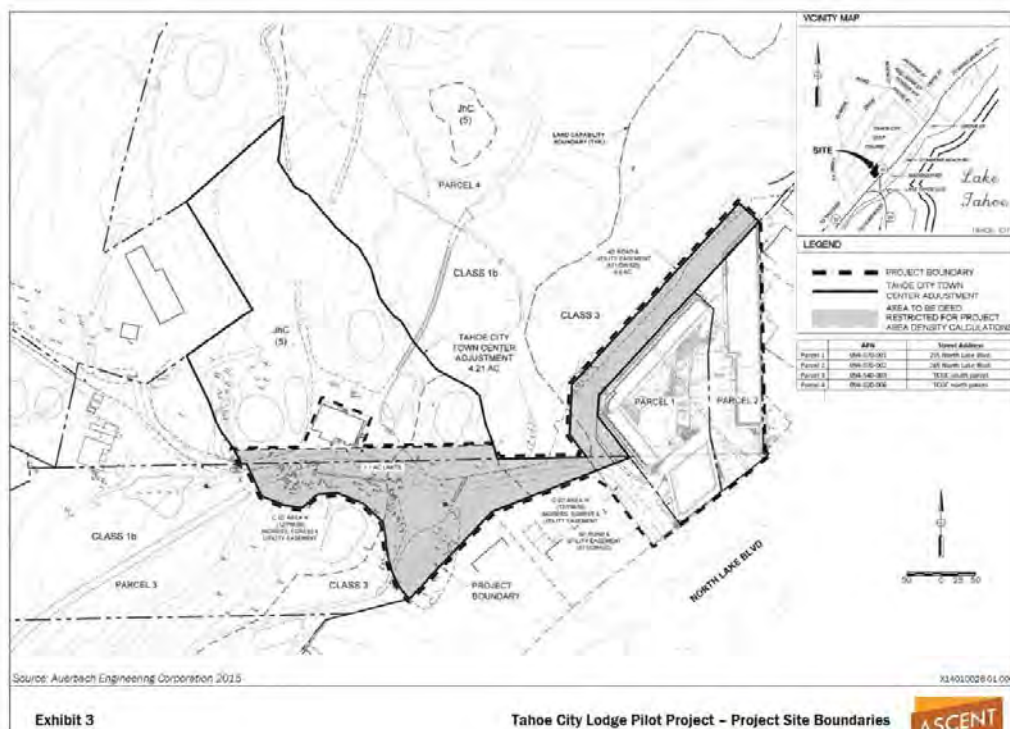
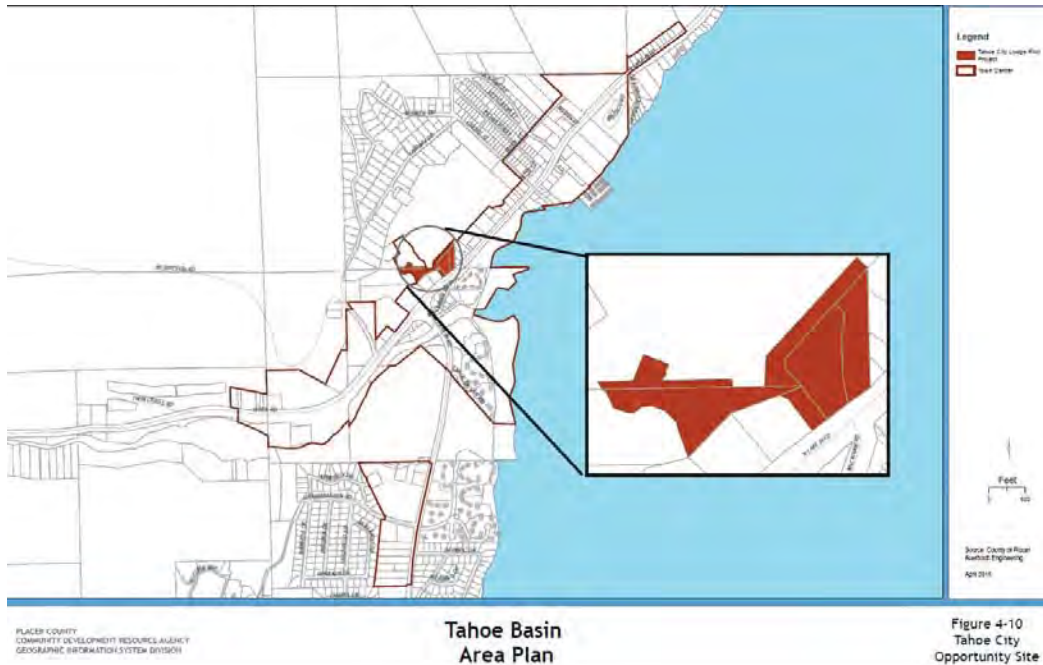
Town Center Boundaries Page 27 Land Use Plan page 97 bottom of page

The Tahoe City Town Center boundary is modified to exclude about 3.4 acres at the Fairway Community Center and about 3.6 acres of restored SEZs along Highway 89 - and to include about 4.2 acres at the Tahoe City Golf Course clubhouse as a mixed use area subject to Special Planning Area requirements as outlined below. Areas excluded from the Town Center are primarily SEZ. Areas added are more suitable for development. The Kings Beach Town Center remains unchanged from the Regional Plan.

Page 28 of Land Use Plan page 98 bottom of page 3. Tahoe City Golf Course Special Planning Area. This area encompasses an area around the Tahoe City Golf Course clubhouse, where off-site SEZ restoration is required if Town Center incentives are used. This part of the Town Center boundary modifications is described above. It is intended to be used for public uses and shared use facilities with Town Center redevelopment projects.

(3. Tahoe City Golf Course Special Planning Area. This area encompasses an area around the Tahoe City Golf Course clubhouse, where off-site SEZ restoration is required if Town Center incentives are used. This part of the Town Center boundary modifications is described above. It is intended to be used for public uses and shared use facilities with Town Center redevelopment projects.)

The Draft Tahoe City Lodge project EIR/EIS must provide another diagram detailing actual golf course boundary versus area to be deed restricted for density calculations to provide the public/agencies a clearer picture of the acreage (1.7 acres) that is required from the golf course to provide 40 units per acre for the Tahoe City Lodge Project. The two figures below do not adequately show Tahoe City Golf Course Boundary-lines and what is proposed to be an easement for the Tahoe City Lodge project.



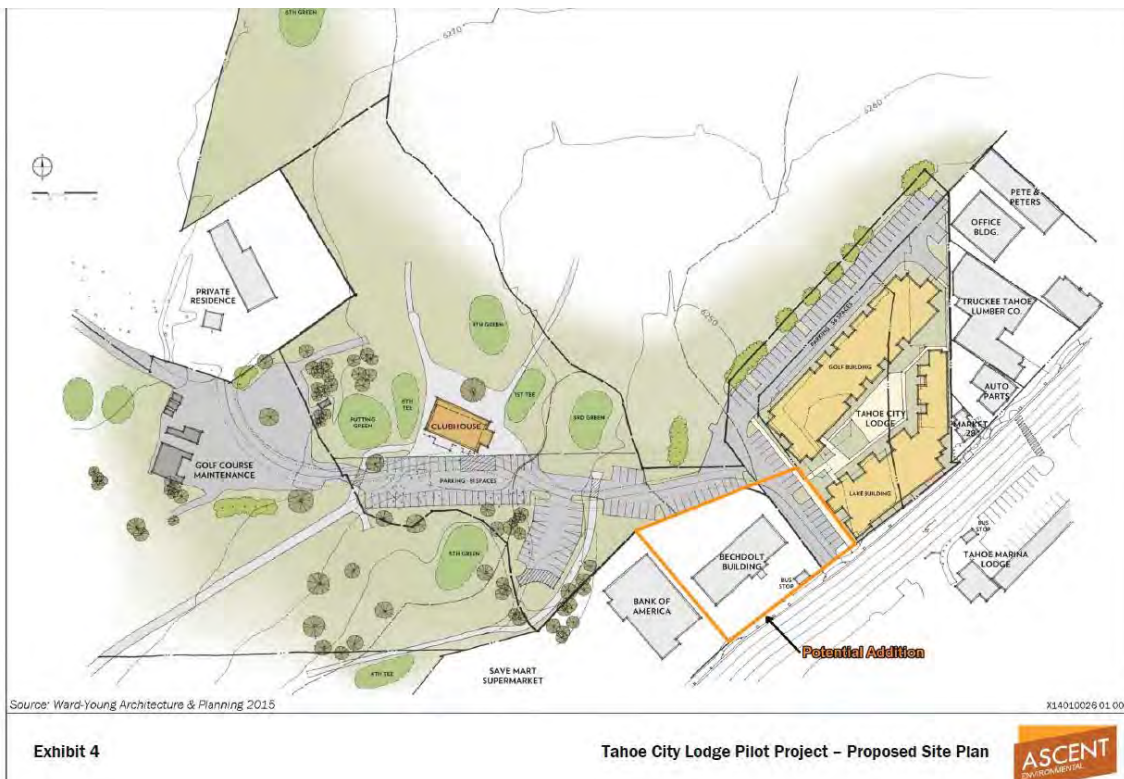
The Draft EIR/EIS for the Tahoe City Lodge Project must disclose how many parking spaces currently exist at the TC Golf Course versus the shared parking proposal. Disclose how many parking spaces would be required just for the 120 (or 140 if applicable) unit lodge versus the golf course as if they were independent projects. Provide detailed maximum demand analysis for the three different parking uses-1) TCGC clubhouse i.e. golf operations, community meetings, fund-raisers, and change in-use of existing golf course clubhouse etc., 2) golf course

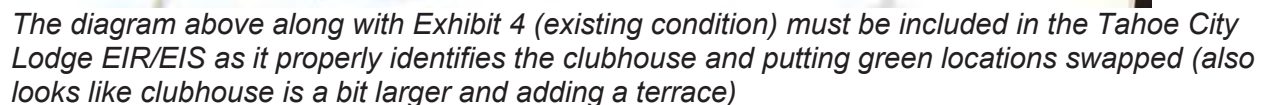
itself 3) lodge. Also provide environmental analysis for parking demands for Summer versus Winter.

The Draft environmental documentation for the Tahoe City Lodge must disclose and provide analysis/information that answers the following questions. Provide detailed information on the MOU between the project and the Tahoe City Golf Course as related to the acreage exchange. Can an off-site easement serve as coverage or acreage accountability in allowing the 40 units per acre? Is a lot line adjustment required by Placer County? Is the acreage deed restricted to the Tahoe City Lodge or the TCGC? Is the shared Tahoe City Lodge and Golf Course parking counted as coverage? Have the Tahoe City PUD rate payers been adequately notified of the new MOU and potential environmental impacts/mitigation obligations that may arise? Have the partners in the MOU that exists for the current ownership of the TC Golf Course concurred on the new MOU with the Tahoe City Lodge Project owner Kila Properties and potential environmental impacts/mitigation obligations that may arise?

The Draft environmental documentation for the Tahoe City Lodge must include analysis of moving the TC Golf Course clubhouse to where the putting green is currently located as well as analyzing proposed winter activities in the same vicinity, as the clubhouse will be relocated to the putting green for deed restricted coverage calculations for the Tahoe City Lodge project.

Provide a diagram showing the new location of the clubhouse (Below: Exhibit 4 from the NOP does not show the proposed relocated clubhouse) as well as proposed clubhouse footprint, coverage and height and detailed environmental analysis of the relocation and new building/terrace proposed.





The Draft EIR/EIS for the Tahoe City Lodge Project must provide an accurate depiction of the project site with proper setbacks, actual width for fire department hammerhead, size of parking spaces, ingress/egress from SR 28, building heights, accommodation mix and size of units, etc.

The environmental analysis for the Tahoe City Lodge as well as cumulative impact analysis for the Area Plan EIR/EIS should include an alternative that only utilizes the Henriksen 1.4 acre footprint which would allow approx. 60 units or if Bechdolt Building is incorporated a maximum of 80 units.

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The Draft Tahoe City Lodge EIR/EIS must provide proposed heliport operations location at the golf course to insure that there is no conflict with a four story proposed Tahoe City Lodge building nearby and include heliport operations safety analysis.

The Draft Tahoe City Lodge EIR/EIS must provide VMT and cumulative effects analysis where drive through traffic will occur to reach shared parking as well as cumulative impact analysis for the Area Plan EIR/EIS. The analysis must include access from Bechdolt Building as well as around the Bank of America building in combination with Tahoe City Lodge and Golf Course right of ways to the proposed shared parking.

The Draft Tahoe City Lodge EIR/EIS must provide detailed information and analysis for food, equipment, linen, etc. deliveries to the Tahoe City Lodge as well as Golf Course operations and clubhouse deliveries. The Fire Department hammerhead cannot be utilized on site for hotel operations as it could conflict with public health and safety.

Provide a list of EIP projects in the Draft Tahoe City Lodge Project EIR/EIS that will be expected to be supported by the Lodge Project/TCGC MOU and require environmental maintenance of those projects.

The Draft Tahoe City Lodge Project and Draft Area Plan must disclose that approximately four acres is being held as residential zoning by the golf course while the remaining golf course zoning will become recreation only. The Tahoe City Lodge Project is requesting less than two acres from the golf course. Disclose and analyze what the other acreage zoned residential is proposed to be used for.

The Draft Area Plan and Draft Tahoe City Lodge Project must specify the breakdown of the types of units to accurately and extensively analyze the different environmental impacts associated with different uses. 40 hotel rooms, 80 condos will have different parking needs, VMT, etc. Along with the breakdown, provide phasing information if applicable. How many condos versus how many hotel rooms in each phase. Will one building be a Phase then the other building (s) a later phase? Provide additional information and environmental analysis if other buildings are proposed.

From NOP Page 10 of NOP Page 8 at bottom of page

PROJECT OVERVIEW

The Tahoe City Lodge Pilot Project proposes to redevelop an existing commercial complex into a 120-unit lodge that would include a mix of hotel rooms and 1- and 2-bedroom suites, conference facilities, a lobby, an activity center, a roof-top swimming pool and hot tub, a recreation room (including workout equipment), food and beverage facilities, as well as parking. The project would operate as a "condo hotel" meaning that the 1- and 2-bedroom suites would be sold to private individuals. However, it is anticipated that nearly all of these units would be put into a rental pool and be rented out through the hotel, subject to Transit Occupancy Tax (TOT) like other hotel rooms. The Tahoe City Lodge Pilot Project site boundaries are shown on Exhibit 3, and Exhibit 4 shows the proposed site plan. Lodging unit sizes would range from approximately 300 to 1,000 square feet. Project design would adhere to TRPA height and mass standards with buildings ranging in height from 2 to 4 stories. The buildings would be configured to have a reduced height and mass at the SR 28 street frontage, and would transition to increased heights further from the street and closer to the golf course.

The applicant is currently in negotiations to acquire an adjacent parcel, APN 094-540-004. This parcel is 0.7 acre in size, is located immediately west of the project site, and is currently 100 percent paved. The location of this parcel is identified on Exhibit 4 as a "Potential Addition" to the project. If the applicant acquires this parcel, the site plan will be redesigned, and some of the proposed uses will be relocated onto this adjacent parcel. The proposed uses will not change; rather, the same mix of uses will be redistributed within the expanded project site, but up to 20 additional units may be added to the project. The applicant anticipates completing negotiations before the Draft EIR/EIS is released. The project description in the Draft EIS/EIR will reflect whether the applicant has acquired this adjacent parcel.

Placer County and TRPA must provide a permissible use and definition for “condo hotel” for which the Tahoe City Lodge Project states it is before approving the Tahoe City Lodge Project as environmental impacts will vary depending on unit type. Develop a Table for permissible size of units, parking requirements, etc.

TRPA code

Condominium

An interest in real property defined or recognized under applicable (California or Nevada) state law as a condominium.

Condominium Development

The division of real property into, or use of real property for, condominiums, including all structures relating to such division or use.

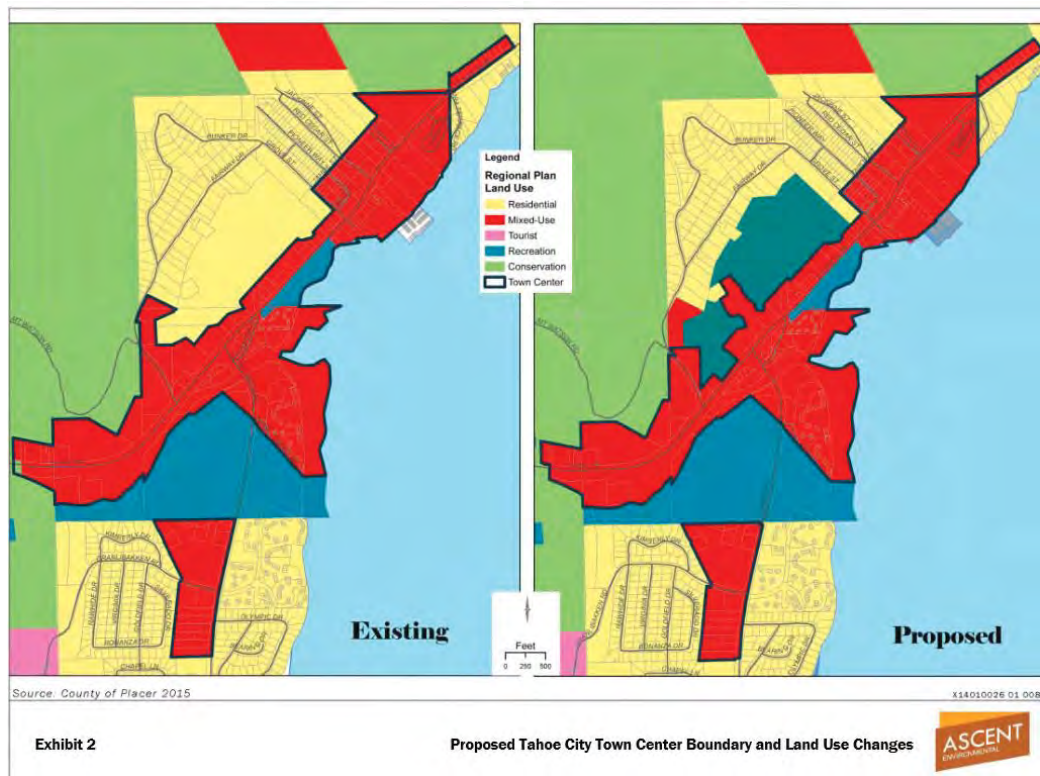
Condominium Conversion

A change in the form of ownership of improved property whereby persons obtain ownership interests in and to, or rights of occupancy of, individual units thereof, including but not limited to, condominiums, community apartments, stock cooperatives and any other similar change in the form of ownership of real property.

USE	DEFINITION
TOURIST ACCOMMODATION	
Bed and breakfast facilities	Residential-type structures that have been converted to or constructed as tourist accommodation facilities where bedrooms without individual cooking facilities are rented for overnight lodging, and where at least one meal daily is provided. The use does not include “Hotels and Motels,” which are defined separately, nor rooming and boarding houses (see “Multi-Family Dwellings”).
Hotel, motel, and other transient dwelling units	Commercial transient lodging establishments, including hotels, motor-hotels, motels, tourist courts, or cabins, primarily engaged in providing overnight lodging for the general public whose permanent residence is elsewhere. This use does not include “Bed and Breakfast Facilities” or “Vacation Rentals.”
Time sharing (hotel/motel design)	A right to exclusively use, occupy, or possess a tourist accommodation unit of a hotel/motel design without kitchen units, according to a fixed or floating time schedule on a periodic basis occurring annually over a period of time in excess of three years.
Time sharing (residential design)	A right to exclusively use, occupy, or possess a tourist accommodation unit of a residential design with kitchen units, according to a fixed or floating time schedule on a periodic basis occurring annually over a period of time in excess of three years.

The Draft Tahoe City Project must deed restrict the hotel units and not allow for condo conversion (like the Resort at Squaw Creek). Provide detailed environmental analysis in the Tahoe City Lodge project EIR/EIS providing condo impacts versus hotel unit impacts as well as cumulative impact analysis as related to the Draft Area Plan EIR/EIS.

The Tahoe City Lodge Draft EIR/EIS must provide detailed information on the 1.6 acres of SEZ restoration required as part of the project requirements. Stating that part of the golf course will be restored is inadequate. In fact, restoration of the TC Golf Course is a BMP requirement that should have been completed by the golf course (not be a project related restoration) when the TCPUD and partners purchased the golf course. Identify location/provide diagram of 1.6 acres of SEZ to be restored by the Draft Tahoe City Lodge Project: off-site restoration or equivalent of on-site and off-site.



Include Exhibit 2 (above) in the Draft Area Plan EIR/EIS and the Draft Tahoe City Lodge EIR/EIS to enable the public/agencies clarity of the proposed boundary-line adjustment to insure accurate and extensive environmental analysis for the proposed re-zoning.

The Draft Area Plan EIR/EIS and the Draft Tahoe City Lodge Identify Tahoe City Lodge Project must identify the location and shared parking on Exhibit 2 for clarity and significance of the requested Boundary-line change.

The Draft Area Plan as well as the Draft Tahoe City Lodge Project environmental documentation must include information and detailed analysis as related to the Tahoe City Lodge Project objectives stated in the NOP as individual project impacts as well as cumulative impacts to the Area Plan:

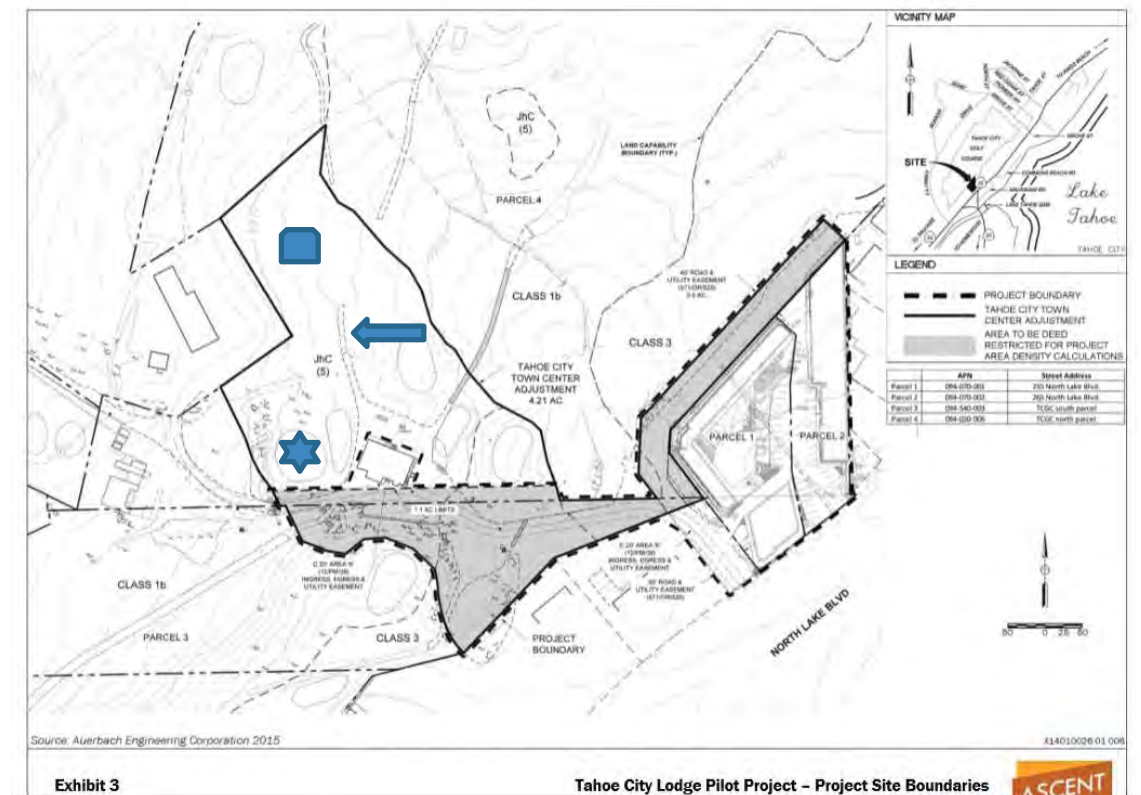
- 1). Provide detailed analysis/criteria of the baseline of the current negative impact on water quality and demonstrate the improvement to water quality with the Tahoe City Lodge Project.*
- 2). Provide a Table and environmental analysis for the Tahoe City Lodge Project by threshold demonstrating contribution to threshold attainment.*
- 3). Provide detailed environmental analysis demonstrating the improved/proposed more efficient entitlement process facilitates environmental redevelopment in the Tahoe Basin.*
- 4). Provide detailed environmental analysis that demonstrates enhancing and improving pedestrian safety and traffic flow at the TC Golf Course is achievable by joining the golf course to the Tahoe City Lodge Project.*

5). Provide detailed environmental analysis of water quality improvements and the capture of fine sediments with the Tahoe City Lodge Project. Provide a diagram showing the reduction of impervious surfaces comparing current footprint of Henriksen site and the proposed Tahoe City Lodge Project.

The Draft Area Plan EIR/EIS and Tahoe City Lodge EIR/EIS must provide detailed scenic analysis from SR 28 – a straight on view of the Tahoe City Lodge Project from the highway and from both the wye and uphill of the project, from the lake, from the golf course and surrounding homes. Provide simulations showing the differences of the current height of Henriksen site versus proposed 4-story Tahoe City Lodge project. Invite the public to view story poles showing the four stories of height location in the spirit of transparency.

Provide detailed environmental analysis in the Draft Area Plan EIR/EIS and Tahoe City Lodge Project Draft EIR/EIS demonstrating reduced coverage will occur with the Tahoe City Lodge/TCGC shared parking, lodge and new TCGC clubhouse as each is located partially in a Stream Environment Zone.




The Draft Tahoe City Lodge EIR/EIS and Draft Area Plan EIR/EIS must include analysis demonstrating acceptable LOS standards will be met and include mitigation measures and assess fees related to LOS standards.





The Draft Tahoe City Lodge EIR/EIS and Draft Area Plan EIR/EIS must provide detailed criteria and environmental analysis for the proposed Tahoe City Town Center boundary-line adjustment as related to the Tahoe City Lodge project site boundaries identified on Exhibit 3 above.

Disclose details and provide environmental analysis for the following:

- 1). *Total residential acres that will remain on the golf course besides the proposal to use approx. 1.1 acres for the Tahoe City Lodge Project. Proposed purpose of remaining residential acreage.*
- 2).  *The criteria for the project boundary-line beyond the club house*
- 3).  *Show the proposed relocation for the new clubhouse*
- 4).  *Could there be another home built here or another use as it will be zoned mixed-use. Disclose potential future use?*

NOP Page 6 of NOP Page 4 at bottom of page

MAP REVISIONS

The proposed Area Plan would implement the following changes to existing land use and zoning maps.

- ▲ **Tahoe City Town Center Boundary and Planned Land Use Changes.** The Area Plan would modify the Tahoe City Town Center boundary to remove 7.12 acres of property surrounding the Fairway Community Center and a Placer County water quality wetland treatment area, and to add 4.2 acres surrounding the Tahoe City Golf Course clubhouse. These changes would result in a net reduction of 2.91 acres in the Town Center. The Area Plan would also modify Regional Plan land use designations and Area Plan zoning within the Tahoe City Town Center to change: (1) land use designations of land added to the Town Center from Residential to Mixed Use; (2) land use designations of the Placer County water basin located adjacent to the golf course

4

Placer County/TRPA
Placer County Tahoe Basin Area Plan

Ascent Environmental

Notice of Preparation

from Mixed Use to Recreation; and (3) land use designations of the remainder of the Tahoe City Golf Course from Residential to Recreation. Exhibit 2 shows these proposed boundary and land use changes.

The proposed Map revisions are confusing. The Draft Area Plan EIR/EIS and Tahoe City Lodge Project EIR/EIS must include maps/diagrams detailing the changes described above in Map Revisions.

Requesting a Town Center boundary-line adjustment, re-zoning/up-zoning, shared parking, map changes, a new MOU between golf course and Tahoe City Lodge project, easements to allow density from golf course to Tahoe City Lodge project, moving the golf course clubhouse, etc. is too complex and confusing and should be stand-alone amendments to the Area Plan and not analyzed in the Area Plan Draft EIR/EIS.

The Kings Beach Town Center Opportunity sites deserve the same level of analysis in the Draft Area Plan EIR/EIS as the Tahoe City Opportunity sites which many are being analyzed as Special/Future Planning Areas if special planning remain in Area Plan analysis.



Opportunity Sites and Estimated Site Capacity

Several opportunity sites have been identified as having the locational and other attributes needed to catalyze the market in the Town Center designations in Kings Beach and Tahoe City as shown in **Map A-1** and **Map A-2**. In Kings Beach, the Community Plan Public Workshops identified six opportunity sites:

- **The Kings Beach Center**, a multi-parcel bounded by SR 28 to the south, Fox and Coon Streets to the east and west, and straddling Salmon Street, represents a major opportunity to create a mixed-use, town center development on non-sensitive lands. The amalgamated sites have the capacity to develop a mixed-use project concept from 80 to 110 TAUs and 30,000 to 50,000 square feet of commercial/office/retail space, incorporating both surface parking and a parking structure.
- **The Ferrari Family Land Holdings** are a collection of antiquated motor lodges along the lake front and on the land side of the lake totaling more than 120 TAUs, complemented by a small amount of CFA and approximately 28 residential units. Over the past decade, the Ferrari Family has been actively trying to redevelop the land in several configurations. These properties represent a significant opportunity to create both a dynamic lakefront resort and generate town center housing units.
- **Central Beach Area**. Perhaps the greatest asset in Kings Beach is its beautiful central beach. Flanked on one side by an underutilized Event Center and on the other by a state park linking to the Kings Beach Center opportunity site, this long stretch of land is home to several restaurants and small retail businesses. Two significant opportunities exist for this site:
 - Construction of a new pier for both a water taxi and private watercraft.
 - Development of a modern and well-planned conference center complex.
- **Eastern Kings Beach**. There are 3 smaller sites at the eastern edge of Kings Beach that were assets of the former redevelopment agency. The properties are known as Swiss Mart, Everett, and the Eastern Gateway. Together or individually, they have the capability to be redeveloped as commercial properties. Under a shared parking scenario, and with transferred TAUs or residential units, they also have the opportunity to become small residential or tourist properties.

Page 5 of the Economic Development of Town Centers Report Feb 2015

1. KEY ISSUES AND REPORT ORGANIZATION

In Placer County, the 2012 TRPA Regional Plan identified Town Centers for both Tahoe City and Kings Beach. Those two communities are the focus of this analysis. Most importantly, in each of these communities, **opportunity** sites for catalyst mixed-use projects have been identified.

As used in this report, a catalyst project is a significant mixed-use project that will encourage additional redevelopment of the community in support of environmental enhancement, economic development, and community goals. Catalyst projects are most likely to be located within a set of "opportunity sites," characterized by strategic infill/redevelopment locations in the Town Centers of Tahoe City and Kings Beach. Both have sites that are antiquated and/or blighted and in need of substantial reinvestment. The strategic position of these sites makes them good prospects for stimulating additional projects once they are developed.

The Draft Area Plan EIR/EIS must provide criteria and environmental analysis demonstrating the Kings Beach Center Design Concept sites provide greater environmental/economic benefit to the Kings Beach Town Center than the Waterfront Improvements properties as the Ferrari, North Tahoe Events Center, etc. could easily be considered Special Planning Areas as identified in the EPS Feb 2015 Report. Although, as previously stated, Special Areas should be day-lighted through a separate process and become amendments to the Area Plan.

From NOP Page 13 of NOP Page 11 at the bottom of the page

1.2.2 Kings Beach Center Design Concept

LOCATION

The Kings Beach Center design concept site includes 16 parcels (totaling approximately 4 acres) owned by Placer County on the mountainside of North Lake Boulevard (SR 28), between Fox and Coon streets. Exhibits 1 and 5 show the location and affected properties. The site also includes the adjacent Placer County Department of Public Works (DPW) parking lot that could be used for shared-use parking. Exhibit 5 also shows the location of other county-owned properties in the vicinity that could be incorporated into the Kings Beach Center design concept as part of an alternative evaluated in the EIR/EIS or redeveloped as a separate project in the future. These properties include:

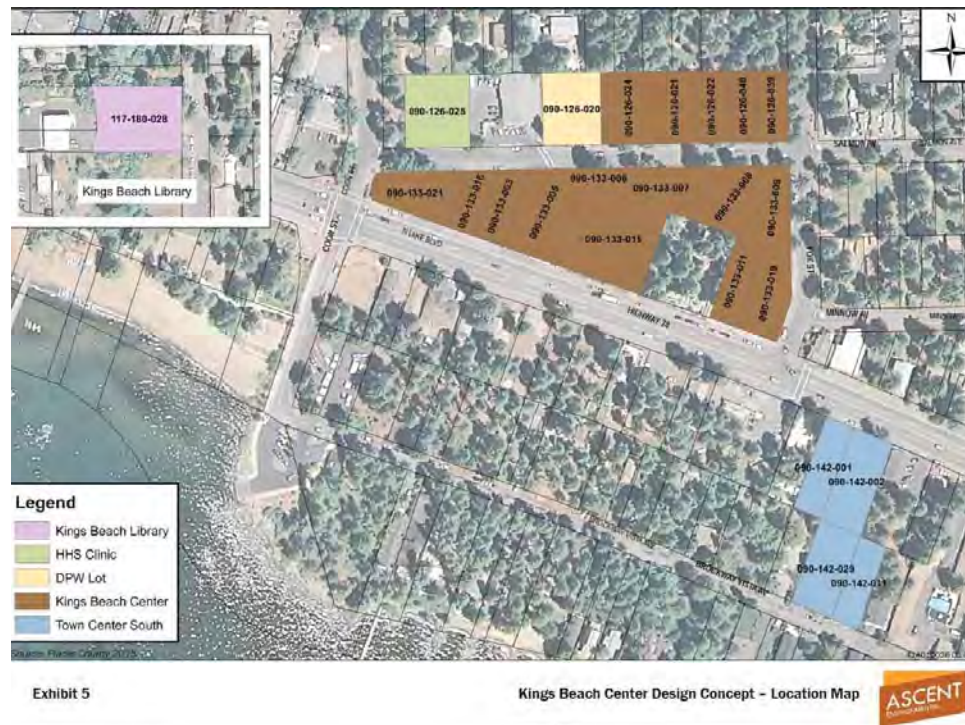
- ▲ the Placer County Health and Human Services (HHS) Clinic on Salmon Avenue,
- ▲ the Placer County Kings Beach Library on Secline Drive, and
- ▲ the Placer County Successor Agency Town Center South vacant lots on the lakeside of SR 28.

DESIGN CONCEPT OVERVIEW

The Kings Beach Center design concept parcels are currently leased to residential and commercial tenants. The collective parcels represent an opportunity for a mixed-use environmental redevelopment design concept in the Kings Beach Town Center. It is the county's intent to market the 16 parcels in 2015 and 2016 to secure a developer for future redevelopment of the site.

For the purposes of evaluation in the EIR/EIS, the county has developed two conceptual proposals that involve a combination of hotel, commercial, professional office, and retail uses. Both options include a government service building, public plaza, community park, and parking. Option A includes a smaller number of hotel units coupled with a larger amount of commercial/retail space than Option B; the hotel complex in both options could include condominiums or privately-owned units. The table below compares the potential redevelopment scenarios under both options. Exhibits 6 and 7 show the conceptual layout of Options A and B.

The NOP description of what will or will not be analyzed is confusing as related to The DPW parking lot (shown on Exhibit 5 below) which is a vacant parcel and not used for parking to date, The KB Library, The Town Center South vacant lots and the Placer HHS Building. The Draft Area Plan EIR/EIS and Kings Beach Center Design Concept program level analysis must disclose if these lots are to be included as part of the Kings Beach Center Design to insure accurate and extensive environmental analysis and provide the public/agencies clarity of the proposed concept.



The Draft Area Plan EIR/EIS and Kings Beach Center Design Concept program level analysis must disclose the type of parking proposed for the DPW (APN 090-126-020) lot: and answer the following questions: 1). Is the proposed parcel for a parking structure 2) Is the parking structure anticipated to be shared parking for the Kings Beach Center Design? The Draft Area Plan EIR/EIS and KB Center Design program level analysis must provide detailed environmental analysis for structured versus surface parking for the DPW lot and identify the number of new versus replacement parking spaces as related to the KB Core Improvement project and the number of new parking spaces for proposed Kings Beach Center Design Concept.

The Draft Area Plan EIR/EIS and Kings Beach Center Design Concept program level analysis must disclose if additional parcels will be added to the DWP parcel for even more parking as depicted on Exhibits 6 & 7 (★) and also must disclose if surface versus structure parking is being proposed and how many parking spaces are new versus replacement for the Kings Beach Core Improvement project and the number of new parking spaces for proposed Kings Beach Center Design Concept.

The Draft Area Plan EIR/EIS and Kings Beach Center Design Concept program level analysis must provide a maximum parking demand analysis for the various uses identified on Exhibits 6 & 7 (retail, office, public service, tourist accommodations, mixed-use, Mini- golf course, Post Office and HHS Clinic specifically, etc.)

The Draft Area Plan EIR/EIS and KB Center Design program level analysis must provide detailed traffic and VMT analysis for the various uses identified on Exhibits 6 & 7 (retail, office, public service, tourist accommodations, mixed-use, Mini- golf course, Post Office and HHS Clinic specifically, etc.)

The Draft Area Plan EIR/EIS and KB Center Design program level analysis must provide detailed traffic and VMT analysis as well as a diagram/site plan of the proposed parking facility on the DWP parcel as it will directly impact the Kings Beach Post Office. Conflict with ingress/egress depending on the site design for parking must be identified and analyzed.

The Draft Area Plan EIR/EIS and KB Center Design program level analysis must provide detailed scenic analysis of both options. Detailed scenic simulations of both options must be included to provide clarity of the findings requirements and other scenic code compliance.

The Draft Area Plan EIR/EIS and KB Center Design program level analysis must provide detailed environmental analysis for Option A and Option B and provide environmental analysis demonstrating which option provides greater environmental benefits and threshold achievement.

The Draft Area Plan EIR/EIS and KB Center Design program level analysis must disclose if Placer County and/or applicant will be providing relocation funds to existing businesses residing in the KB Design Center Concept parcels and financial feasibility of those relocation costs.

From NOP



Exhibit 6

Kings Beach Center Design Concept – Conceptual Site Plan, Option A





Exhibit 7

Kings Beach Center Design Concept – Conceptual Site Plan, Option B

NOP Page 7 Page 5 at the bottom of page: In addition to these land use changes, the Area Plan includes minor Regional Plan land use adjustments in the Kings Beach Town Center to align parcel lines with Town Center boundaries

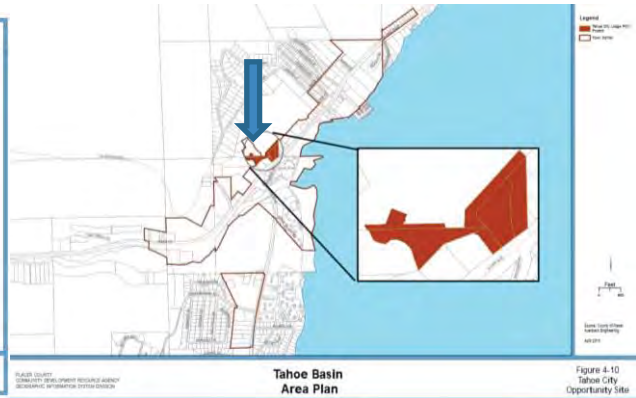
The Draft Area Plan EIR/EIS must disclose and provide detailed information and criteria for Kings Beach Town Center “minor” Regional Plan land use adjustments. Provide diagram of proposed alignments/boundary line changes and APN numbers and current/proposed zoning of affected parcels. The Draft Area Plan EIR/EIS must define/provide criteria for minor and land use adjustment.

Correct Figure 4.9 and 4.10 in the Land Use Section and Exhibit 2 in NOP (when used in the environmental documentation) to add a different color or symbol for the North Stateline Area of the Kings Beach Town Center as North Stateline is not a Town Center. The same for the proposed boundary-line adjustment for the Tahoe City Town Center as neither have been approved, only proposed. Both sites are only being considered/proposed for future planning as Special Areas and must not be identified as Town Center Boundary-lines on any diagram until the Area Plan is approved.

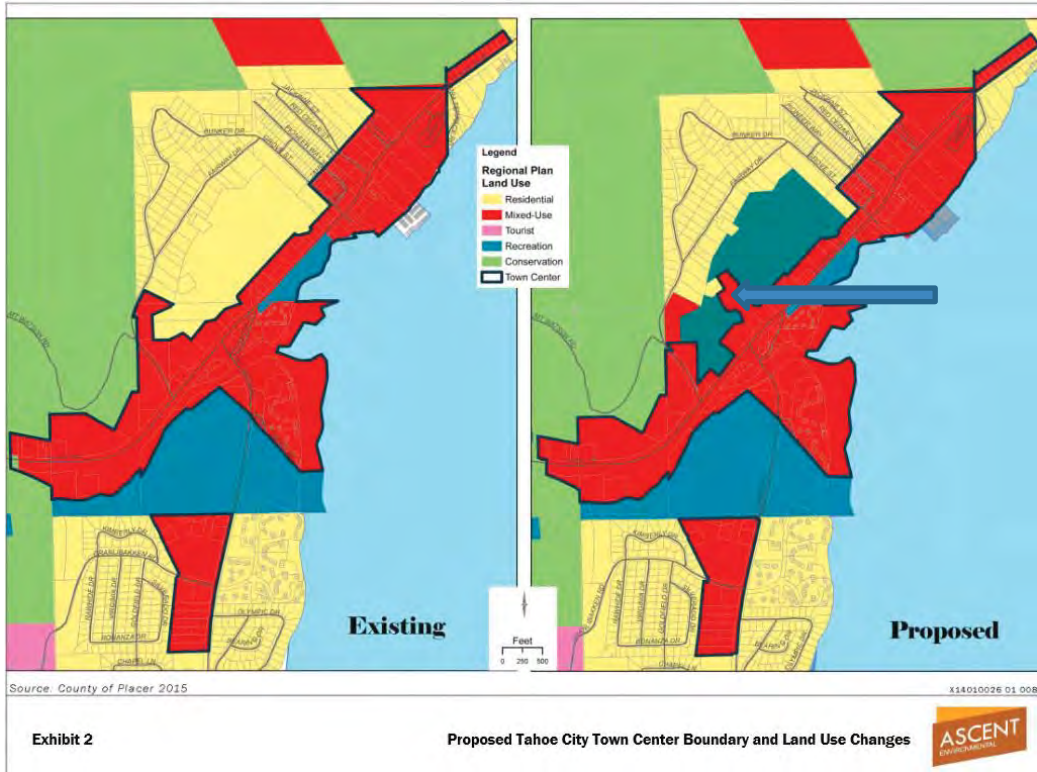
NOP Exhibit 9



NOP Exhibit 10



NOP Exhibit 2



4.7 Land Use and Community Design Policies Page 34 Land Use Plan 104 bottom of page
This section outlines Land Use and Community Design Policies for the Placer County Tahoe Basin Area Plan, which supplement the Regional Plan Goals and Policies.

LAND USE

LU-P-1 Continue to implement TRPA policies, ordinances and programs related to land use and development that are in effect.

LU-P-2 Manage development in accordance with the TRPA growth control system and supplemental programs in this Area Plan, including development rights, IPES, allocations, transfers and conversions.

LU-P-3 Continue to coordinate with TRPA, the California Tahoe Conservancy, local Public Utility Districts and other agencies to acquire, improve and manage lands for public and environmental purposes.

LU-P-4 Develop zoning districts consistent with Regional Plan that reflect the unique community characteristics of the Area Plan subareas.

LU-P-5 Direct development toward Town Centers and preserve the character of surrounding neighborhoods.

LU-P-6 Direct development away from functioning stream environment zones and other sensitive areas.

Further develop LU-P-1 through LU-P-6 to add meaningful criteria that demonstrates environmental gain with implementation of policies- include in the Draft Area Plan EIR/EIS.

LU-P-7 Require each project seeking an allocation of additional commercial floor area to contribute toward achieving community-wide improvements. Projects shall also be subject to commercial floor area allocation procedures.

Further develop this policy to state once additional CFA is obtained it must be deed restricted and not allowed to be converted to another use or transferred again. Provide criteria that demonstrates contribution toward achieving community-wide improvements. Provide list of applicable community-wide improvements- include in the Draft Area Plan EIR/EIS.

LU-P-8 Coordinate with TRPA on assigning development allocations to the respective Area Plan subarea.

LU-P-9 Maintain the current allowed densities for areas outside of Town Centers.

Provide detailed environmental analysis, location, and criteria for proposed secondary housing units outside town centers that demonstrate current densities will be maintained- include in the Draft Area Plan EIR/EIS.

LU-P-10 Encourage public gathering places, outdoor dining, and special event venues.

Further develop this policy by identifying appropriate locations for: gathering places, outdoor dining and special events venues in each of the sub-areas not just the Town Centers- include in the Draft Area Plan EIR/EIS.

LU-P-11 Address parking, transportation, water quality, public access, SEZ restoration, land coverage, and other issues affecting the Plan area through community-wide approaches that encourage redevelopment and maximize attainment of environmental thresholds.

Further develop this policy by identifying issues within each sub-area. Provide criteria demonstrating contribution toward achieving community-wide improvements and threshold gain. Provide list of applicable community-wide improvements- include in the Draft Area Plan EIR/EIS.

LU-P-12 Encourage tourist-oriented uses in areas designated as Mixed-Use or Tourist. Prioritize locating tourist retail uses on street and sidewalk frontages.

Further develop this policy by identifying criteria for tourist-oriented uses and identify designated areas on a diagram- include in the Draft Area Plan EIR/EIS.

LU-P-13 Maintain and enhance open spaces in the Plan area in accordance with Regional Plan goals and policies for Open Space.
Provide diagram showing current location of open spaces and proposed maintenance plan

LU-P-14 Projects should include strategies for protecting undisturbed sensitive lands and, where feasible, establishing park or open space corridors connecting undisturbed sensitive areas within Centers to undisturbed areas outside of Centers.

Further develop this policy by providing the criteria and strategies/guidelines/standards for protecting undisturbed sensitive lands and establishing parks and open space.

LU-P-15 Provide areas for passive and active recreation uses and related services to improve public access and enjoyment of Lake Tahoe and the Truckee River.

LU-P-16 Support efforts to restore disturbed land and improve public access along segments of the Truckee River corridor where access is limited. Where feasible, relocate the multi-use trail to the river frontage.

LU-P-17 Consider future land use map amendments for non-conforming uses.

Further develop LU-P-1 through LU-P-17 to add meaningful criteria that demonstrates environmental gain with implementation of policies- include in the Draft Area Plan EIR/EIS. The Draft Area Plan EIR/EIS must include criteria and applicable mitigation measures for all proposed land use policies.

MIXED USE

MU-P-1 Promote the revitalization of Town Centers and Village Centers by encouraging a mixed land use pattern that combines tourist accommodation, residential, commercial, public facilities and public spaces to serve visitors and locals alike.

Provide separate policies for Town Centers and Village Centers to insure accurate and extensive environmental analysis.

MU-P-2 Create distinctive, connected, and walkable districts that have a strong sense of identity.

MU-P-3 Promote site sensitive design and pedestrian-oriented activities in mixed-use developments.

Further develop this policy by identifying criteria for what constitutes sensitive design and pedestrian-oriented activities.

MU-P-4 Foster high quality design, diversity, and a mix of amenities in new residential, commercial and tourist accommodation, where appropriate.

Further develop this policy by identifying criteria for what constitutes high quality design, mix of amenities

MU-P-5 Establish design standards for mixed-use tourist districts that build on the existing tourist recreation theme with high-quality storefronts designed to attract tourists, and meet the needs of local residents.

Further develop this policy by identifying criteria for what constitutes high quality storefronts that attract tourists as well as meeting the needs of the locals. Example: KB Central Market, Rustic Lounge restaurant

MU-P-6 Support future Regional Plan amendments that promote redevelopment of Village Centers and other mixed use areas that are not included in a Town Center.

Further develop MU-P-1 through MU-P-6 to add meaningful criteria that demonstrates environmental gain with implementation of policies- include in the Draft Area Plan EIR/EIS. The Draft Area Plan EIR/EIS must include criteria and applicable mitigation measures for all proposed Mixed-use policies.

TOWN CENTER

TC-P-1 Reform Town Center development standards to minimize barriers to environmentally beneficial redevelopment in accordance with the Regional Plan.

TC-P-2 Implement Regional Plan incentives for the transfer of development from sensitive and outlying areas to Town Centers.

TC-P-3 Establish building height and density standards for Town Centers that support a high-quality, compact, pedestrian-scaled environment.

TC-P-4 Require that development have variations in height and provide transitional height limits adjoining property outside Town Centers.

TC-P-5 Require that any four story buildings between the Highways and Lake Tahoe enhance views from the highway to the lake.

TC-P-6 Complete the sidewalk network in Town Centers.

TC-P-7 Address environmental and economic enhancements in Town Centers through community-wide, locally sustained programs and projects, such as community parking management, area wide coverage management programs, and area wide water quality improvement programs.

TC-P-8 Reduce land coverage through environmental redevelopment and transfers of development from sensitive and remote property to Town Centers.

TC-P-9 Emphasize compact form and pedestrian orientation in Town Centers, in locations that many residents reach on foot, by bicycle, on transit, or by short drives.

Add TC-P10 Provide opportunities for affordable housing, including senior housing in The Town Centers mixed-use areas where public transportation is easily available, close to neighborhood serving retail facilities, and where such development will be compatible with surrounding land uses allowing for walkable, bikeable commutes to employment and meets the needs of the local community members.

Further develop TC-P-1 through TC-P-9 to add meaningful criteria that demonstrates environmental gain with implementation of policies- include in the Draft Area Plan EIR/EIS. The Draft Area Plan EIR/EIS must include criteria and applicable mitigation measures for all proposed Town Center policies.

COMMUNITY DESIGN

CD-P-1 Require that building and site designs be consistent with the Scenic Quality Thresholds and standards.

CD-P-2 Limit unbroken length of buildings and articulate building entrances with recesses, projections, overhangs, and architectural details in order to create a pleasant and engaging experience for pedestrians.

CD-P-3 Require landscaping with both private and public development projects. Protect existing trees of importance, size, age, and value to the maximum extent feasible with the goal of ensuring their long-term survival.

CD-P-4 Upgrade commercial properties in the Plan area that are in need of scenic restoration through remodeling, renovation, screening, landscaping, and, in some cases, through complete removal of the use or activity.

CD-P-5 Require new and redeveloped commercial, tourist accommodation, or multifamily residential projects in the Plan area to go through the Design Review process and meet applicable design standards and guidelines.

CD-P-6 Buffer adjacent residential uses from the commercial, tourist and public service uses of Town Centers through site design, transitional height limits, landscaping, vegetation, and screening.

CD-P-7 Require projects to provide landscape screening of on-grade parking areas that consist of either manmade or plant materials, or combinations of both, effective year round.

CD-P-8 Encourage commonly designed architectural monuments throughout the Plan area, particularly at gateways.

CD-P-9 Encourage use of architectural designs and materials that are unique to each Plan area.

CD-P-10 Encourage the upgrading or replacement of commercial advertising signs that detract from the aesthetic appearance of the community.

CD-P-11 Provide on-site pedestrian facilities with non-residential, mixed-use and multi-family projects and encourage multi-use paths between uses within the Plan area.

Further develop CD-P-1 through CD-P-11 to add meaningful criteria that demonstrates environmental gain with implementation of policies- include in the Draft Area Plan EIR/EIS. The Draft Area Plan EIR/EIS must include criteria and applicable mitigation measures for all proposed Community Design policies.

REDEVELOPMENT

DP-P-1 Provide incentives to encourage rehabilitation and/or remodeling of commercial, tourist, recreation, public service, and residential properties. Prioritize projects that emphasize rehabilitation by replacement or remodeling of substandard and inefficient development.

DP-P-2 Consider development of an allocation strategy that assigns priority of commercial floor area (CFA) to projects that emphasize remodeling and rehabilitation of substandard development.

DP-P-3 Encourage consolidation of development and restoration of sensitive lands to a naturally-functioning condition through transfer of development rights and transfer of land coverage programs.

DP-P-4 Pursue a program for land use conversions that minimize barriers to interjurisdictional transfers and allow the conversion of commercial floor area to tourist accommodation units.

DP-P-5 Pursue the acquisition of tourist accommodation units (TAUs) on sensitive lands and obtain TAU bonus units from TRPA to incentivize high priority redevelopment projects that participate in community-wide improvements as determined by the County.

Further develop DP-P-1 through DP-P-5 to add meaningful criteria that demonstrates environmental gain with implementation of policies- include in the Draft Area Plan EIR/EIS. The Draft Area Plan EIR/EIS must include criteria and applicable mitigation measures for all proposed Redevelopment policies.

HOUSING

HS-P-1 Provide affordable and employee housing within the Plan area and encourage employee shuttles to major employers, such as ski resorts and casinos.

HS-P-2 Require larger scale commercial, recreational, and tourist accommodation projects to contribute their fair share toward providing employee housing.

Further develop (HS-P-1 and 2) policies to add that major employers, ski resorts and casinos must provide funding in-lieu of an already imbalanced system to support the transportation of and housing needs of their employees. Assess current workforce and develop fair-share funding requirements.

HS-P-3 Multi-residential bonus units may be utilized for affordable and/or employee housing projects.

HS-P-4 Provide opportunities for affordable housing, including senior housing in appropriate areas where public transportation is easily available, close to neighborhood serving retail facilities, and where such development will be compatible with surrounding land uses.

HS-P-5 Allow for secondary residences on parcel sizes less than one acre in size within ¼ mile of Mixed Use areas and transit routes and restrict such units to residential use.

HS-P-6 Pursue TRPA-Certified Local Governing Housing Programs pursuant to Sections 21.3.2.B, 52.3.4 and 52.3.6 of the TRPA Code of Ordinances to provide additional opportunities for deed-restricted affordable and moderate income housing.

HS-P-7 Evaluate housing needs in the region in coordination with TRPA. Consistent with Regional Plan Housing Policy HS-3.1, update TRPA policies and ordinances as necessary to achieve state, local and regional housing goals. Future housing efforts should seek to remove identified barriers preventing the construction of necessary affordable housing in the region including, but not limited to, workforce and moderate -income housing, secondary residential units and long -term residency in motel units.

Further develop this policy to insure fair-share affordable housing is located throughout the 72 acre Area Plan.

Additional policies and analysis in Draft Area Plan EIR/EIS must include:

- 1). Distinguish between resort/vacation development and permanent occupancy development to identify where differing levels of public services may be required. The Draft EIR/EIS should include analysis for the differing levels of public service required.*
- 2). Require that new/re-development be designed and constructed to protect, enhance, rehabilitate, and restore the following types of areas and features, Scenic corridors; SEZ and, travel routes in non-attainment.*
- 3.) Ridgeline protection areas should be established throughout the Area Plan and be sensitive to avalanche, landslide, severe slope stability problems, streams and other areas subject to flooding from a 100-year storm, areas with extreme and high fire risk and airport safety zones.*
- 4). Include analysis and mitigation measures in the Draft Area Plan EIR/EIS for the proposed Tahoe Basin Urban Boundary expansion and what impacts this has on Growth Management defined in the Regional Plan approved 12-12-12. It is appropriate to analyze the Boundary Line change as this will affect the Area Plan boundary environmental analysis for cumulative effects.*
- 5). All new development shall be required to meet current state requirements for energy efficiency. The retrofitting of existing units shall be encouraged.*
- 6). Participate with other jurisdictions and Caltrans in the planning and programming of improvements, as well as maintaining the adopted level of service (LOS), for State Highway 267, 28, 89 in accordance with state and federal transportation planning and programming procedures, so as to maintain acceptable levels of service for Placer County. The Draft Area Plan EIR/EIS must include all correspondence and Caltrans documentation verifying acceptable LOS standards allowing the public/agencies to comment on problematic areas. The Draft Area Plan EIR/EIS must include mitigation measures and assess fees related to LOS standards.*
- 7). Establish a program for funding contributions by new/re-development for implementation of transit services to meet current and future demands.*
- 8). Establish a policy for coordinating land use planning decisions which are especially pertinent with respect to major land use decisions immediately adjacent to the Region (Martis Valley West, Squaw Expansion, Northstar Master Plan, etc.) which may have significant impacts on the Region and affect the ability of TRPA to attain environmental thresholds.*
- 9). The Draft Area Plan EIR/EIS must establish a policy to prohibit ski lift facilities, parking and ski runs on TPZ or Forest Service lands in the Tahoe Basin.*

REPORT PURPOSE

This document—Existing Conditions Report—analyzes environmental resources and hazards, land use and community form, and infrastructure, and discusses planning implications that will need to be addressed as part of a process to update plans in the Placer County portion of the Lake Tahoe Basin area and develop Area Plans that may be found in conformance with the Tahoe Regional Planning Agency (TRPA) Regional Plan. This report also discusses the existing regulatory context, existing policies that should be carried forward and new policy opportunities as they relate to the updated Regional Plan. The information conveyed will help community members, County staff, and elected officials make informed input and decisions throughout the rest of the Community Plan Update. Economic and market issues are analyzed in the Economic and Market Analysis Report, which EPS completed in July 2013. This report is included as Appendix F.

The EIR/EIS must analyze the Existing Conditions Report September 2013 and EPS Report February 2015 as both are referenced and utilized for the Area Plan.

The Land Use Section in the EIR/EIS should include maps of each of the sub-areas: land capability, land coverage, existing land uses, Area Plan land uses, to show more detail of locations to allow the public/agencies to comment on the overall sub-areas environmental health and impacts and to insure that the proper level of environmental analysis is completed in the EIR/EIS. Figures 2.6, 2.7, 4.2, 4.5 below should be broken down by sub-area

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%202-6%20Land%20Capability.pdf>

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%202-7%20Land%20Coverage.pdf> *Not just the Town Centers*

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%204-2%20Land%20Use%20Kings%20Beach.pdf> *Not just the Town Centers*

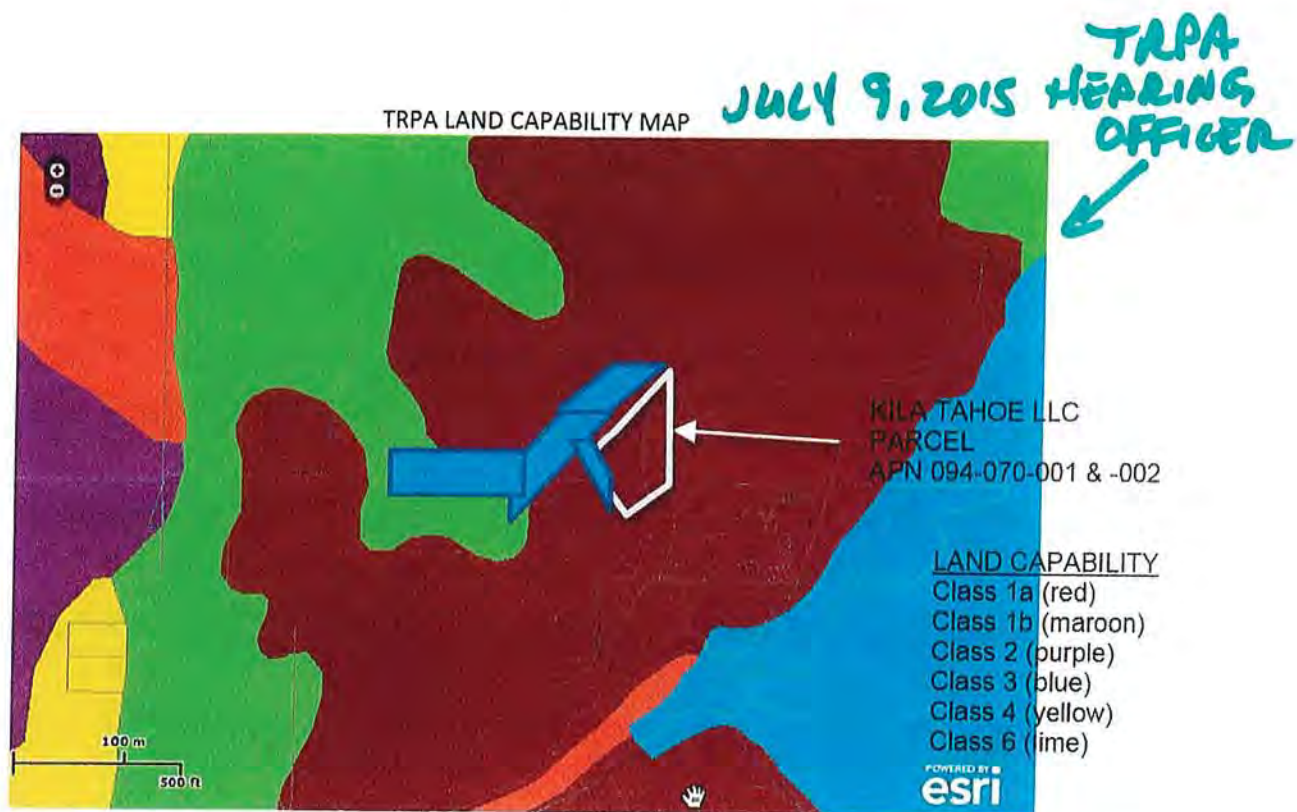
<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%204-5%20Area%20Plan%20Land%20Use%20Map.pdf>

The Land Use Section in the EIR/EIS should include maps of each of the sub-areas for flood zones, fish habitat, vacant sites, to allow the public/agencies to assess the sub-areas environmental health and potential environmental impacts for future land use planning and development.

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%202-14%20Flood%20Zones.pdf>

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%202-12%20Fish%20Habitat.pdf>

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/Figures/Figure%204-4%20Vacant%20Sites.pdf>



Land surrounding the proposed challenge has previously been changed with Tahoe City Golf Course challenge in April 2014 from 1b to Class 3 where proposed shared parking will be located. An approximation of where change was made is demonstrated- refer to actual change on PROPOSED Challenge map.

Other previous changes with the TCGC challenge will result in: 1). TCGC clubhouse being located in Class 5 entirely where it was partially Class 1b. 2) proposed shared golf course/lodge parking location changed from 1B and Class 5 to Class 3..

The TC Lodge project and golf course require detailed analysis and should not be part of the Draft Area Plan EIR/EIS.

The map provided above, with a professional engineered overlay, must be included in the Draft Area Plan EIR/EIS as well as the Tahoe City Lodge Draft EIR/EIS Area Plan to provide clarity for public/agencies comment and insure accurate and extensive environmental analysis.

The independent land capability challenge changes for the golf course and The Tahoe City Lodge project are intertwined but have not been reviewed as a proposed project. The MOU between the Lodge and TCGC should also be discussed for clarity.

Allowing 120 units on a 1.4 acre site though calling the site 3.1 acres is confusing and misleading and too many units for less than 1.5 acres where only ½ of the units would be allowed without the add'l acreage calculation.

The Tahoe City Lodge site includes 2 parcels as noted in the NOP documentation above and diagram below but will use acreage from off-site shared easement and call it 3.1 acres

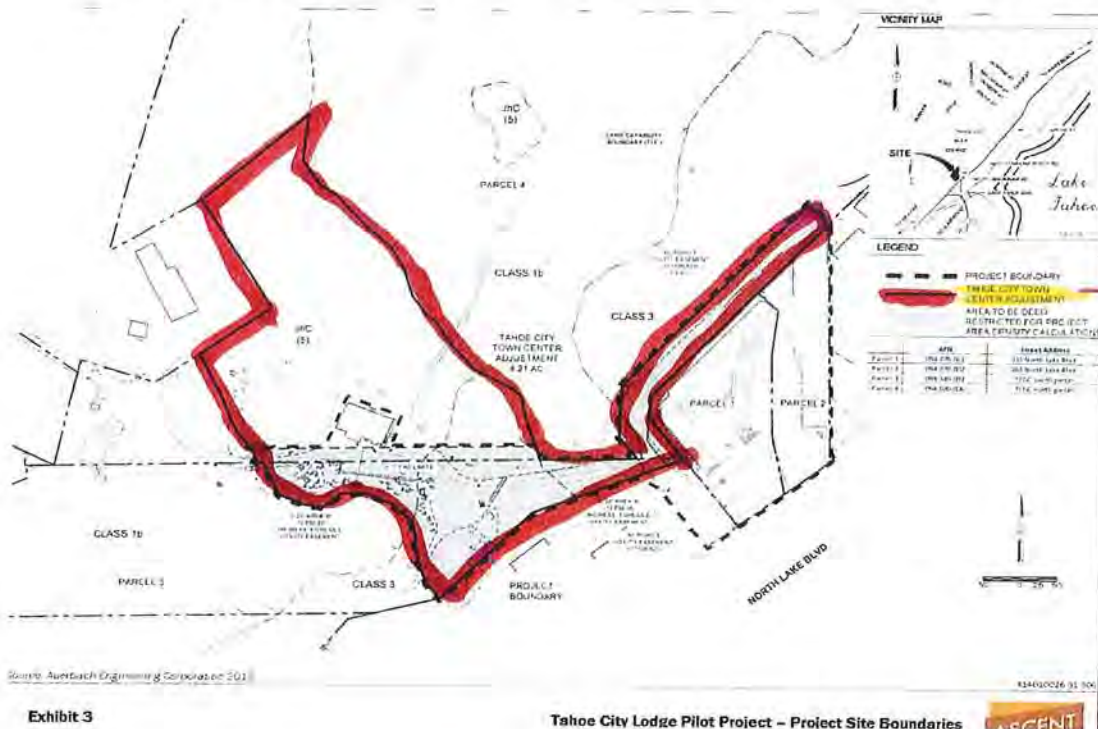


Exhibit 3

Tahoe City Lodge Pilot Project – Project Site Boundaries

1.2.1 Tahoe City Lodge Pilot Project

PROJECT LOCATION

The approximately 3.1-acre Tahoe City Lodge Pilot Project site is situated east of the intersection of SR 28 and SR 89 near the western entrance to Tahoe City (Exhibit 1). The site is located at 255 and 265 North Lake Boulevard and includes Assessor Parcel Numbers (APNs) 094-070-001 and 094-070-002, which comprise approximately 1.4 acres. The project site also includes two existing easements on adjacent properties (a 0.5-acre easement from the Tahoe City Golf Course and a 0.1-acre easement from the parcel to the west of the project site) and 1.1 acres of the Tahoe City Golf Course.

PROJECT OVERVIEW

The Tahoe City Lodge Pilot Project proposes to redevelop an existing commercial complex into a 120-unit lodge that would include a mix of hotel rooms and 1- and 2-bedroom suites, conference facilities, a lobby, an activity center, a roof-top swimming pool and hot tub, a recreation room (including workout equipment), food and beverage facilities, as well as parking. The project would operate as a "condo hotel" meaning that the 1- and 2-bedroom suites would be sold to private individuals. However, it is anticipated that nearly all of these units would be put into a rental pool and be rented out through the hotel, subject to Transit Occupancy Tax (TOT) like other hotel rooms. The Tahoe City Lodge Pilot Project site boundaries are shown on Exhibit 3, and Exhibit 4 shows the proposed site plan. Lodging unit sizes would range from approximately 300 to 1,000 square feet.



Tahoe City Lodge recent land capability challenge. I attended the Hearings Officer meeting July 9 for a requested change from SEZ 1b to Class 5 for the Lodge location. Staff included information that did not show the recent 2014 challenge info for the adjacent Tahoe City Golf Course which changed 1b to Class 3 bordering this project in April 2014 but instead showed the lands as all 1b surrounding the property. That challenge change will benefit this project and shared golf course and lodge parking.

I presented maps (handed out) to the Hearings Office who stated to staff that they should have been used for the challenge and when the project comes forth, should be the most up to date info. I'm bringing this to your attention as this is a highly unusual process with the proposed Lodge project that has an agreement and requests for easement acreage to allow up to 40 units per acre on approx. 1.4 acres.

The independent land capability challenge changes for the golf course and The Tahoe City Lodge project are intertwined but have not been reviewed as a proposed project and will have to be analyzed as part of the Placer Area Plan environmental documentation but should have been done as one challenge showing the project intent.

The agreement between the Lodge and TCGC should also be discussed for clarity.

I am requesting that the Tahoe City Lodge project come before you as a Board with more detail disclosing what is necessary to get this project on the ground i.e. Area Plan incentives from the Town Centers, The Tahoe City Golf Course Boundary line change to be included as a Community Plan Boundary change as well as a Special Planning Area #2 approval and much more. I believe the complexity of issues will get glossed over/frankly lost with the enormity of the proposed changes in the Placer County Area Plan approval process.

Also note the date of the TCPUD letter of intent to transfer assets is the same time as the TC Golf Course Land Capability Challenge approval.

TCPUD Policy Statement Regarding Transfer of Assets

TCPUD is willing to negotiate for use or transfer of Tahoe City Golf Course assets and consider entering into public-private partnerships to facilitate redevelopment of the Tahoe City commercial core under the following guidelines and understandings:

- TCPUD holds title to the Tahoe City Golf Course pursuant to the terms of a Memorandum of Understanding with Placer County, North Lake Tahoe Resort Association and the Truckee Tahoe Airport District (Partners). Any negotiation for use or transfer of assets must address the individual Partners' purposes for their financial contribution to the acquisition.
- Any proposal to transfer assets must also preserve a viable golf course and winter sports park, allow for additional public recreation, preserve water rights and not preclude the ability to construct a water treatment plant in the future.
- TCPUD will rely upon the Partners' recommendations for transfer of those assets that are unrelated to TCPUD's purposes.
- The public must benefit from the value of any assets used or transferred.
- Once the Partners' recommendations and goals are met, the buyout provisions in the MOU will be revised or eliminated to reflect the commensurate change in values.
- Any future agreements will be subject to public review and disclosure consistent with the Brown Act.

Approved by the Board of Directors 4/18/2014

References:

http://www.trpa.org/wp-content/uploads/TCPUD-Golf-Course_Staff-Summary_UPDATED1.pdf
Tahoe City Golf Course Land Capability Challenge March 2014 Hearings Officer Mtg

http://www.trpa.org/wp-content/uploads/ITEM-NO.-V.C. KILA-TAHOE_LCC.pdf
Kila Properties Land Capability Challenge Hearings Officer Mtg July 2015

NON-BINDING LETTER OF INTENT

This Non-Binding Letter of Intent is entered into on April 21, 2014, by and between the Tahoe City Public Utility District, a California local agency, and Kila Properties, LLC, a California limited liability company.

Tahoe City Public Utility District (TCPUD) holds title to the Tahoe City Golf Course pursuant to a Memorandum of Understanding (MOU) between it and Placer County, North Lake Tahoe Resort Association, and the Truckee Tahoe Airport District (collectively the Partners).

At this time, TCPUD has been requested to execute a Non-Binding Letter of Intent that would indicate a willingness to negotiate a future agreement regarding a public/private partnership with Kila Properties. Kila Property acknowledges and agrees that it is not relying on, and will not rely on, this Non-Binding Letter of Intent to purchase or complete the purchase of any property and/or to pursue development entitlements for any property.

Pursuant to the TCPUD Board Policy adopted on April 18, 2014 concerning the utilization or transfer of Tahoe City Golf Course assets for redevelopment purposes within the Tahoe City commercial core, TCPUD is willing to enter in a Letter of Intent with the following provisions:

NON-BINDING

This Letter of Intent is intended solely as a basis for further discussion between the parties and is not intended to be and does not constitute a legally binding agreement. Accordingly, this Letter of Intent creates no obligation for either party to enter into a future agreement and shall not confer on any person or entity any rights or remedies. The parties will only be obligated if they approve, execute and deliver a future agreement. Either party may terminate discussions and negotiations for the future agreement at any time and for any reason without any liability or obligation to the other party. Each party shall pay and be responsible for its own fees, costs and expenses with respect to this Letter of Intent and the preparations and negotiations for the future agreement.

INTENT

TCPUD is willing to enter into negotiations regarding a possible future agreement with Kila Properties (or its assigns) which will address the following:

- Implementation of deed restrictions on a portion of the Tahoe City Golf Course (TCGC) property to facilitate an increased density of tourist accommodation units for the proposed hotel development that would be located at 255 and 265 North Lake Blvd.
 - This could only occur if all or a portion of the TCGC property is included in the Town Center boundaries and would most likely result in a commensurate reduction in development potential on the golf course property.

- Implementation of shared parking that would provide adequate parking for the recreation uses at the TCGC property and provide some of the parking required for the proposed hotel development.
- Potential shared or restored coverage to address regulatory requirements to support redevelopment.

The future agreement would detail Kila Properties' and the TCGC's contributions to:

- The redevelopment of the TCGC Club House building which would include improvements to the kitchen, bar, exterior, and addition of conference room/special event space, for joint use by the TCGC and the hotel.
- The construction of shared parking infrastructure on the TCGC property.
- Participation in extended operations of the restaurant/kitchen at the TCGC.
- Participation in the coordinated installation of best management practices for TCGC and the proposed hotel development.
- Allow for construction of improved entry way and signage for the TCGC.
- Potential memberships/packages for the golf and winter sports park operations to increase operating revenues.

Specific terms of these benefits would be mutually agreed to in a future agreement, subject to a public input process and contingent on agreement or approval of all of the Partners.

4/22/2014

Date

Tahoe City Public Utility District

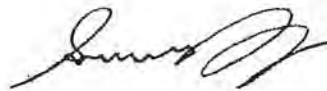


By: Cindy Gustafson, General Manager

5/7/14

Date

Kila Properties, LLC



By: Samir Tuma, CEO

TCPUD Policy Statement Regarding Transfer of Assets

TCPUD is willing to negotiate for use or transfer of Tahoe City Golf Course assets and consider entering into public-private partnerships to facilitate redevelopment of the Tahoe City commercial core under the following guidelines and understandings:

- TCPUD holds title to the Tahoe City Golf Course pursuant to the terms of a Memorandum of Understanding with Placer County, North Lake Tahoe Resort Association and the Truckee Tahoe Airport District (Partners). Any negotiation for use or transfer of assets must address the individual Partners' purposes for their financial contribution to the acquisition.
- Any proposal to transfer assets must also preserve a viable golf course and winter sports park, allow for additional public recreation, preserve water rights and not preclude the ability to construct a water treatment plant in the future.
- TCPUD will rely upon the Partners' recommendations for transfer of those assets that are unrelated to TCPUD's purposes.
- The public must benefit from the value of any assets used or transferred.
- Once the Partners' recommendations and goals are met, the buyout provisions in the MOU will be revised or eliminated to reflect the commensurate change in values.
- Any future agreements will be subject to public review and disclosure consistent with the Brown Act.

Approved by the Board of Directors 4/18/2014

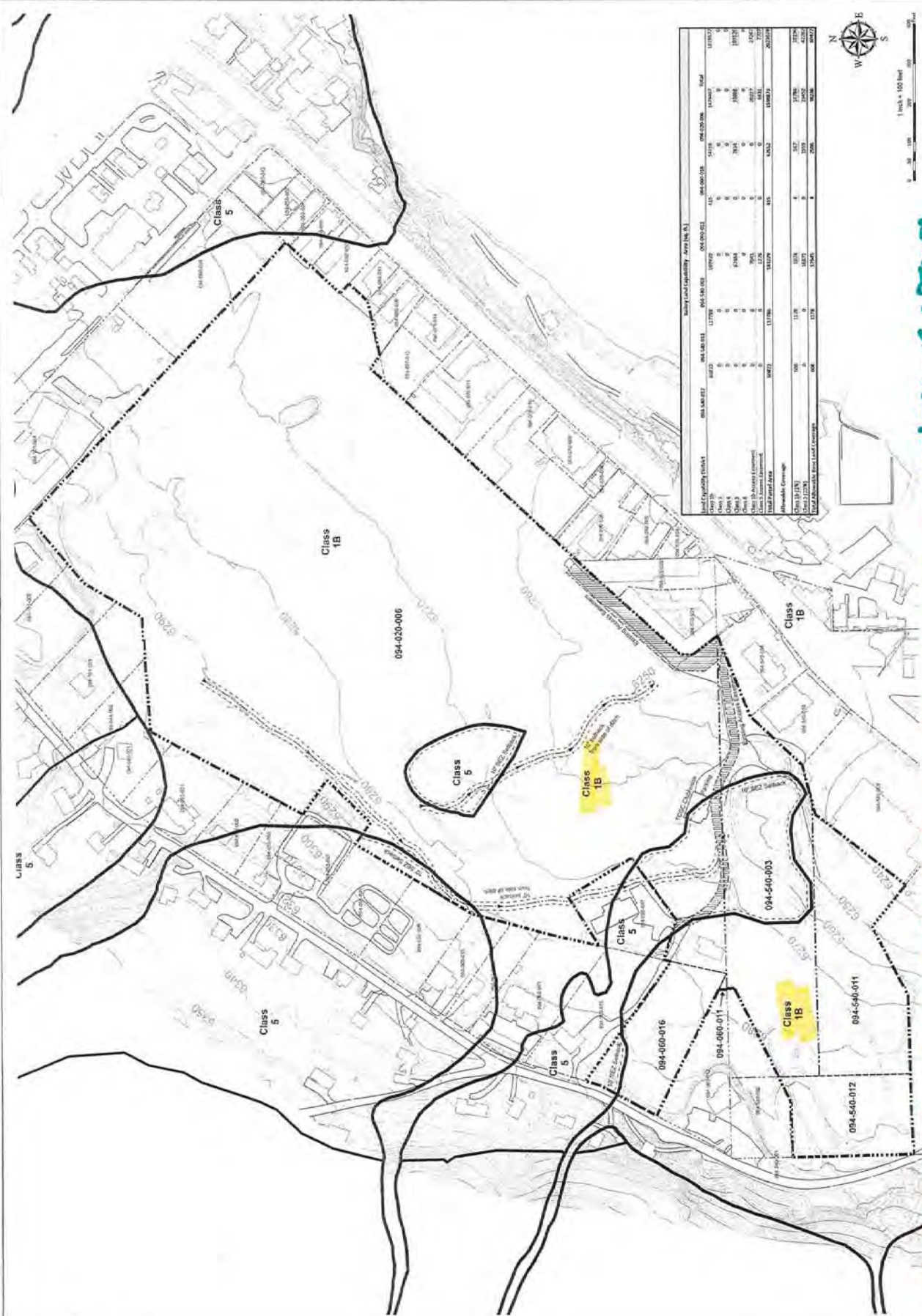
8 of 10 7-22-15 Elie Waller

1 OF 02
SHEET

EXISTING LAND CAPABILITY (Bailey)

TAHOE CITY PUBLIC UTILITY DISTRICT
P.O. BOX 2248
TAHOE CITY, CA 96146
(530) 583-3796

TAHOE CITY PUBLIC UTILITY DISTRICT
P.O. BOX 2248
TAHOE CITY, CA 96146
(530) 583-3796



9 OF 10 7-22-15 Ellie Waller MARCH 2014 TRPA HEMLOCK OFFICE

Comments to the TRPA Governing Board
and Advisory Planning Commission

Regarding the

Placer County Tahoe Basin Area Plan

NOP

Comments to the APC, June 10, 2015

We've only had the documentation for one-week so providing comments is tough. There will be more comprehensive comments to follow.

I beg to differ with Arlo's assessment of the implementing regulations- there are a lot more details than he states. There is more to this public review process than just the 20 page Notice of Preparation for Placer County Tahoe Basin Area Plan. The Area Plan itself has 100's of pages to review and comment to be made by August 3, 2015: 313 pages of the implementing regulations which include: District standards, Area-wide standards, Permissible Uses, Transfer of development rights, etc. Another 125 pages which includes Conservation, Land Use, Recreation, etc. Additionally, researching The Existing Conditions report -318 pages, approx. 35 figures with various details, The Economic Development Incentives for Town Centers report -97 pages, related Placer and TRPA code- this is an enormous undertaking to provide relevant and substantive comment.

I am asking you to carefully review the documentation so when asked to approve you are fully aware of the implications of implementation of the proposed plans. I am asking that you require the following documents (appendices) be part of the environmental analysis and scoping as they were used and are still being referenced as guiding principles for the Area Plan process.

From Placer webpage announcing the NOP and Area Plan :

Appendices (reference documents - **not a part of the Area Plan**):

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<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/Parking%20Study%20Final%20Report.pdf>

List of all the documents to be reviewed.

Public Review Draft Tahoe Basin Area Plan

<http://www.placer.ca.gov/departments/communitydevelopment/planning/tahoebasinareaplan>

Placer County has released its June 2015 Public Review Draft Tahoe Basin Area Plan and Notice of Preparation (NOP) of a Draft Environmental Impact Report/Environmental Impact Statement (EIR/EIS) for the proposed Tahoe Basin Area Plan and Tahoe City Lodge pilot project. Written comments should be submitted no later than 5:00 p.m. on August 3, 2015 to: Environmental Coordination Services, Community Development Resource Agency, 3091 County Center Drive, Suite 190, Auburn, CA 95603. Comments can be faxed to (530) 745-3080, or emailed to cdraecs@placer.ca.gov.

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[Figure 7-2](#) Schools and Public Safety Services

I am requesting code be amended immediately to define “Pilot Program and Pilot Project as this terminology is being utilized more regularly and should require criteria/definition as no definition currently exists in TRPA code.

Also mixed- uses were not analyzed in the Regional Plan Update to determine the impacts outside Town Centers. The EIR/EIS will need to provide analysis for those areas outside Town Centers

From the Placer Implementing Regulations document pages 1-156

1.06 **Definitions of Terms and Uses**

- A. **Terms.** The terms used in this document are defined in the TRPA Code of Ordinances, Chapter 90, Definitions.
- B. **Uses.** Land Uses in this document are defined in Chapter 21, Permissible Uses, of the TRPA Code of Ordinances.
- C. **Shorezone Uses.** Shorezone Uses in this document are defined in Chapter 81, Permissible Uses and Structures in the Shorezone and Lakezone, of the TRPA Code of Ordinances.

Unlike the scheduling for the Tahoe Valley Area Plan that you heard earlier, the public was not / has not been made aware of the Pilot Project Tahoe City Lodge being added for analysis in the NOP by the Placer Planning Commission or Board of Supervisors. Seems to me the local jurisdiction should be hearing this NOP before the TRPA and no meetings are currently calendared for those two local jurisdiction bodies. The two Public Workshops are not announced in the NOP: June 22, 2015 and June 29, 2015. They should have been part of the NOP notification package.

Page 1 of the NOP starts by introducing the “opportunity sites” and continues throughout the NOP. Eight pages plus additional paragraphs of the total eighteen pages of the NOP are dedicated to two proposed project level studies. The entire Area Plan encompasses the portion of Placer County that is also within the jurisdiction of TRPA, an area of 46,162 acres (72.1 square miles). It seems fitting that the NOP should have more details related to the 72 acres and not so much focus on the two projects proposed to be studied. The NOP should have also recommended that the public and agencies reviewing the NOP refer to various documents on-line especially the implementing regulations to allow the public/agencies to provide substantive comments to ensure the proper level environmental analysis is performed (see above).

The proposed Tahoe City Lodge Pilot Project should be a separate environmental process. Why is Placer County subsidizing a developer's environmental analysis? Provide information in regards to how much the developer and owners of Tahoe City Golf Course (which also benefits from this environmental analysis) should be expected to pay toward environmental analysis which would be normally required of an applicant. Placer County should not bore the cost for a specific projects environmental analysis- it should be bore by the applicant.

That said, Placer County owns the former BBLLC project area and should not analyze it either until a private developer or developers purchase the project sites. Placer should not be spending our taxpayer dollars to market the former BBLLC project through this Area Plan process. These costs should be bore by the potential developers/investors.

I have on several occasions asked with no answer why Placer abandoned the four Area Plan concept which makes much more sense. The four sub-areas more accurately represent zoning, community, character, etc. instead of one large geographic area. Environmental analysis will be much more conclusive if done by sub-area.

Public Comment at beginning of the meeting

I am asking TRPA staff to re-visit the permissible uses chart in regards to Beach Recreation definition as you of my consternation with the Martis Camp Beach Shack in Tahoe Vista which requested/was approved 60 PAOTs. Another project may propose the same use in Tahoe Vista : The Shore House recently purchased by The Ritz Carlton and there are impacts like parking standard requirements, etc.

Oral Comments to the TRPA Governing Board, June 25, 2015

I'll be framing this a little differently. The revised Placer County Tahoe Basin Area Plan NOP is far more complex and confusing than the last one. This is one gigantic 72 acre area plan.

The new NOP is basically focused on one specific project- not sure why we are calling it a Pilot Project- should just drop that moniker and call it The Tahoe City Lodge. This is precedent setting and is requesting that you as decision-makers allow this project to move through environmental analysis alongside the zoning that will govern it. The other focus of the NOP is a program level project so Placer County can market the former BBLLC project that Placer now owns.

I'm hoping Board member Severson can assist me in getting the Tahoe City Lodge on the July Placer Board of Supervisors agenda for open public discussion.

I have suggested two alternatives that have broken down the larger proposed singular Area Plan into 2 up to 5 Area Plans.

The complexity comes with 1). Requesting a new conversion program to allow CFA to become TAUs that was not analyzed in the Regional Plan is also not insignificant. This program is requesting an additional 400 TAU's that have not been analyzed in the Regional Plan.

2). Allowing a Project Area to include non-contiguous parcels was also not studied in the Regional Plan and will have environmental impacts.

3). The request to allow an additional residence on less than one acre is requesting a code amendment.

4). Also stating that changing the Tahoe City Town Center Boundary is just a Map Revision. It's changing the Urban Boundary line and will require its own amendment.

I think the Special Planning Areas: Special Plan Area #1 Tahoe City Western Entry, Special Plan Area #2 Tahoe City Golf Course, Special Plan Area #3 Truckee River Corridor Industrial Properties, Special Plan Area #4 Kings beach Entry (SR 267 and SR 28 intersection) and Special Area #5 North Stateline should not be studied in this EIR/EIS as they are unique areas with unique standards that will be allowed. They should be a separate process with a separate NOP and become an amendment to the Area Plan after it's approved as it states in the NOP that these five special areas are for future planning.

Simply stating there are no changes to the areas outside Town Centers and using current Plan Area Statement descriptions for regulation and TRPA code is glazing over the FACT that many of those areas have been assigned mixed-use overlays and do require additional environmental analysis as mixed-use addresses additional code that could cause impacts that must be studied as well as analyzing for threshold attainment and were not part of the analysis of the existing Plan Area Statements.

I'll close with I as well as many other team members are disappointed that Placer chose to refer to TRRA code instead of using our 2+ years of input on what the community wants as community character on this Area Plan. I have provided you over 30 pages of comments so- more to come

Additional RPIC comment

Ellie Waller North Tahoe West Team Member and Tahoe Vista Resident June 24, 2015
TRPA Governing Board comments for the record (Jennifer Montgomery Coffee June 25, 2015)

The EIR/EIS should cite page number and chapter of where anything has stated to be tiered from the Regional Plan, TMDL, RTP, etc.

Ellie Waller, Tahoe Vista Resident, Member North Tahoe West Area Plan Team
Comments for the Record Placer County Notice of Preparation : Tahoe Basin Area Plan
June 24, 2015 TRPA Governing Board and RPIC

There is more to this public review process than just the 20 page Notice of Preparation for Placer County Tahoe Basin Area Plan. The Area Plan itself has 100's of pages to review and comment to be made by August 3, 2015: 313 pages of the implementing regulations which include: District standards, Area-wide standards, Permissible Uses, Transfer of development rights, etc. Another 125 pages which includes Conservation, Land Use, Recreation, etc. Additionally, researching The Existing Conditions report -318 pages, approx. 35 figures with various details, The Economic Development Incentives for Town Centers report -97 pages, related Placer and TRPA code- this is an enormous undertaking to provide relevant and substantive comment.

I provided this same info to the APC and am asking you (the Governing Board Members) to carefully review the documentation so when asked to approve you are fully aware of the implications of implementation of the proposed plans. I am asking that you require the following documents (appendices) be part of the environmental analysis and scoping as they were used and are still being referenced as guiding principles for the Area Plan process.

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Provide a Table in the EIR/EIS showing all required TRPA Regional Plan and code amendments as well as another Table for all Placer County code and other plan amendments.

Additional Table (s) defining all the separate approvals required (i.e. Area Plan, Tahoe City Lodge, the former BBLLC program level amendments, Tahoe City Community Plan Boundary adjustment, Special Areas being considered and associated amendments, etc.)

The Placer County Tahoe Basin Area Plan EIR/EIS must cite (chapter and page number as well as providing detailed documentation) where in the Regional Plan, environmental documentation analysis has been performed when stating tiering is being used in-lieu of additional environmental analysis and provide proof of no additional impact as well as threshold gain. The EIR/EIS should also cite Regional Transportation Plan and Total Maximum Daily Load documentation applicability with chapter and page number references.

The new NOP is basically focused on one pilot project (The Tahoe City Lodge) which is a precedent setting request allowing a project to move through environmental analysis alongside the zoning that will govern it and a program level project so Placer County can market the former BBLLC project that Placer now owns through our tax dollars.

Page 1 starts by introducing the “opportunity sites” and continues throughout the NOP. Approximately 8 pages of the NOP plus additional paragraphs of the total eighteen pages of the NOP are dedicated to these opportunity sites. The Area Plan encompasses the portion of Placer County that is also within the jurisdiction of TRPA, an area of 46,162 acres (72.1 square miles). It seems fitting that the NOP should have more details related to the 72 acres and not so much focus on the two projects proposed to be studied.

One alternative should include moving forward with the Tahoe City and Kings Beach Town Centers as one or two Area Plans as that is the focus of this NOP. Getting the Tahoe City Lodge on the ground seems to be a Placer County priority- craft the Tahoe City Area Plan first, then Kings Beach Area Plan to market the BBLLC site.

Then revisit the other two sub-areas of West Shore and North Tahoe West as separate Area Plans as there is conflicting and confusing information for those two areas- it's not just the Plan Area Statement info being tweaked.

Another alternative should be four separate Area Plans as originally envisioned in the first scoping process April 2014 which is what the Board of Supervisors originally approved for the process and the public adopted. This will allow environmental benefits and impacts to be better analyzed with a smaller geographic area identified. Those four areas could be expanded to five to allow for the future of a Town Center at North Stateline (separate from the Kings Beach Town Center) The four Area Plans have already been identified and now called sub-areas with sub-districts so determining boundaries and districts is not an issue. The Teams that participated for 2.5+ years identified characteristics for each area and that information is also available.

Furthermore, provide in the EIR/EIS an additional Table showing the population of each of the four sub-area Plans. The documentation should note that population decrease and economic instability and lack of sustainability can also be attributed to the economic downturn and shoulder season declines. Just providing incentives for future re-development does not guarantee population or economic stability. Provide environmental and financial analysis proving population fluctuations effect sustainability and economic development.

3.1 Population

Like many areas in the Lake Tahoe Region, the Plan area has sustained a decline in its permanent population base for many years. The population within the Placer Tahoe Basin Area Plan was 9,716 as of April 2010 according to the 2010 U.S. Census, a 20 percent decline from the 2000 population of 12,158 (Table 3.1-A). The loss of population is in large part due to a declining regional economy and a dramatic increase in residential home prices starting in 2001.

Table 3.1-A: Population Trends in the Area Plan

Community	2000	2010	% Change
	Population	Population	
Dollar Point	1,539	1,215	-21.1%
Kings Beach	4,037	3,796	-6.0%
Sunnyside	1,761	1,557	-11.6%
Tahoe Vista	1,668	1,433	-14.1
Carnelian Bay	n/a	524	n/a
Tahoma	n/a	1,191	n/a
Remainder	3,153	n/a	n/a
Total	12,158	9,716	-20.1%

Source: 2000/2010 U.S. Census

Race and ethnicity in the

61

The EIR/EIS should develop ridgeline protections ordinances and provide environmental analysis for the entire Area Plan as the Martis Valley West Parcel has the potential to build upon a basin ridgeline. Ridgeline protection ordinances should be approved before any project on the ridge can be submitted. Stating that it is a stand-alone Area Plan does not negate the responsibility to protect the other affected communities on the North Shore in Placer County.

Placer County Foresthill Divide has some protections- expand those for applicability to the Tahoe basin as there is a known conflict from outside the basin with the Martis Valley West Parcel Specific Plan and potential for the Martis Valley West Parcel Area Plan within the basin which is currently suspended.

From the Foresthill Divide Community Plan:

3.C.1-4 Design all new development to be compatible with the scale and character of the area. Structures, especially those outside of commercial centers, should be designed and located so that:

- a. They do not silhouette against the sky above ridgelines or hilltops
- b. Roof lines and vertical architectural features blend with and do not detract from the natural background or ridge outline;

3.C.9-1 New development in scenic areas (e.g., river canyons, watersheds, scenic highway corridors, community gateways, ridgelines and steep slopes) outside the commercial core shall be planned in a manner which employs design, construction, and maintenance techniques that:

- a. Avoid locating structures along ridgelines and steep slopes such that they would be silhouetted from below or from a public road;

Ellie Waller, Tahoe Vista Resident, Member North Tahoe West Area Plan Team
Comments for the Record Placer County Notice of Preparation : Tahoe Basin Area Plan
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- b. Incorporate design and screening measures to minimize the visibility of structures and graded areas;
- c. Maintain the character and visual quality of the area.
- d. Utilize natural landforms and vegetation for screening structures, access roads, building foundations, and cut and fill slopes.
- e. Incorporate landscaping that avoids significant discontinuity in landscaping vegetation between developed areas and adjacent open space or undeveloped areas

From the Horsebar/Penryn Community Plan

15. To the maximum extent possible, all structures, including residences, should complement and blend in with the natural setting of the planning area, and to this end the following principles shall be incorporated into the project design:
 - a. The visual impact of the structure shall be mitigated either through reduction of building bulk, increased setbacks, or introduced hillside structures shall be designed to step down the natural hillside in order to achieve a low building profile and minimize grading.
 - b. Structures may be located within existing tree covered areas and still be consistent with slope, geologic and related conditions and the need to preserve natural terrain and locally unique or especially beautiful wooded areas.

Horseshoe Bar/Penryn Community Plan

77

Rev. 12/05

- c. Largely bare slopes and sparsely wooded ridges visible from large portions of the planning area should be kept free of structures to the maximum extent possible.

Additional prescribed protections are in the Draft Lake Tahoe Basin Mgmt. Unit document dated June 2012

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5371194.pdf

Ellie Waller, Tahoe Vista Resident, Member North Tahoe West Area Plan Team
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Scenic Quality

The public has expressed a strong desire to maintain the scenic integrity of the Lake Tahoe Basin, while accommodating forest management activities on public lands. Key valued scenic attributes include overall scenic quality of the natural environment, lake views, and dark night sky views (minimization of lighting to allow for dominance of natural, nighttime light). Other public desires include flexibility in design development to ensure that desired community character is achieved, and prevention of further loss of critical views.

- DC1.** *Scenery viewed from Lake Tahoe and the Basin's major roadways, public recreation areas, trails and urban centers predominantly displays natural-appearing forest, meadows, mountains, and the shoreline of Lake Tahoe. Development, where visible, appears subordinate to and harmonious with the surrounding setting. (Pathway)*
- DC2.** *Views of the night sky from the naturally-appearing areas of the Basin are conducive to star gazing. Light emanating from the built environment is carefully controlled to ensure safety and security and does not encroach upon the regional dark sky. (Pathway)*
- DC3.** Management activities promote scenic stability and increase resistance to visual disruption resulting from disturbance events. Landscape alterations complement and blend with the characteristic landscape of the Lake Tahoe Basin. Vegetation treatments are designed to produce natural-appearing diverse forest structure.

Martis Valley West Specific Plan proximity to the Tahoe Basin Boundary-line: The proposed Martis Valley West Specific Plan lies on the same ridgeline as the Tahoe basin and will have impacts on the Tahoe Basin. The MVW Specific Plan identifies 760 units to be built. The project must be analyzed for cumulative effects, scenic, traffic, air quality, etc. as specifically related to the North Tahoe West sub-area above Tahoe Vista and Carnelian Bay as well as cumulative effects to the Tahoe Basin

Maps must be consistently represented in the environmental documentation. Two examples provided below

Page 20 Map of the Implementing Regulations document pages 1-156 show map representing boundary as part of North Tahoe East plan while Map on Page 159 in Implementing Regulations pages 157-313 is more representative of what the North Tahoe West Plan Team members have been provided the past 2.5 years.

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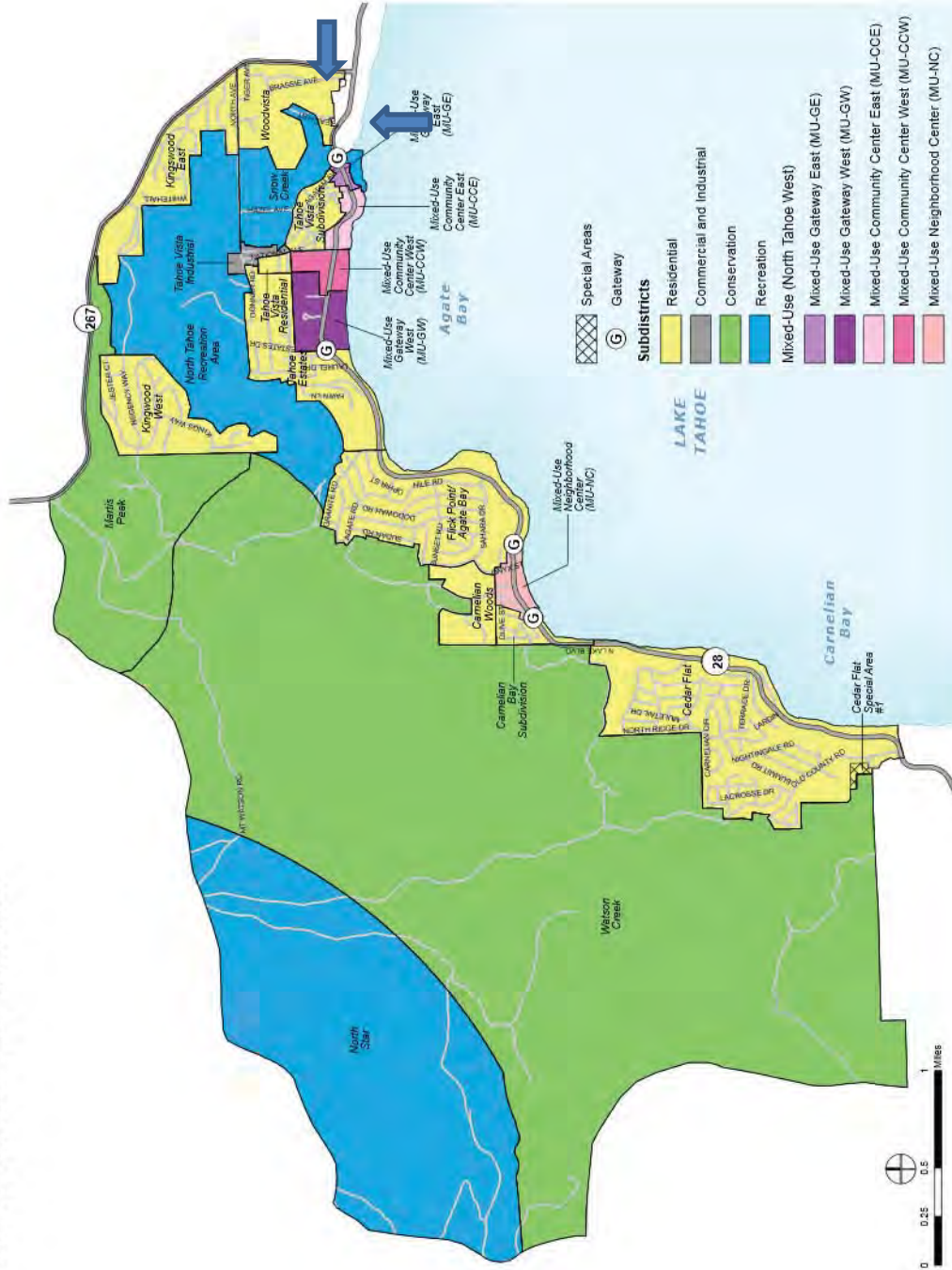
NORTH TAHOE EAST: MIXED USE DISTRICTS



Denotes over lapping on North Tahoe West to North Tahoe East subareas- designate which subarea Beach and Brassie are aligned with.

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NORTH TAHOE WEST SUB AREA



There is much more confusion with the provided documentation that must be corrected in the EIR/EIS.

Tahoe Vista is identified as a Community Center in the implementing ordinances document and a Village Center in the Land use section. To further complicate the confusion, overlaying the mixed-use district on maps but also identifying the area as having a tourist element which has different standards, incentives, etc.

Provide clarification and identify applicable TRPA code.

The maps must be consistent or at the very least be identified in another section explaining how they all are coordinated and what ordinances are applicable.

2. Zoning subdistricts where TRPA Code of Ordinances Community Plan standards apply are as follows:
 - a. The former Tahoe City Community Plan includes all subdistricts within the Tahoe City Town Center plus the Fairway Service Subdistrict.
 - b. The former Kings Beach Community Plan includes all subdistricts within the Kings Beach Town Center.
 - c. The former North Stateline Community Plan includes the MU-TOR (Mixed Use – Tourist) Subdistrict within the North Stateline Town Center.
 - d. The former Tahoe Vista Community Plan includes the MU-CCW (Mixed Use – Community Center West), MU-CCE (Mixed Use – Community Center East), MU-GW (Mixed Use – Gateway West), and MU-GE (Mixed Use – Gateway East) Subdistricts.
 - e. The former Carnelian Bay Community Plan includes the MU-NC (Mixed Use – Neighborhood Commercial) Subdistrict.
 - f. The former Kings Beach Industrial Community Plan includes the Kings Beach Industrial Subdistrict.
- E. The Placer County Code applies to the area within a conforming Area Plan to the extent that a provision is not in conflict with the TRPA Code of Ordinances or this document.
- F. In case of conflicts between the provisions of this Area Plan and other TRPA Code of Ordinances provisions, the most restrictive provision applies. In all other cases, the Area Plan provisions apply.

Mixed-use does not include tourist which is a separate designation on another map. Provide clarification for the inconsistency of the zoning.

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7. **Mixed-Use (Formerly Commercial and Public Service Areas)**

Mixed-use areas are urban areas that have been designated to provide a mix of commercial, public services, light industrial, office, and residential uses to the region or have the potential to provide future commercial, public services, light industrial, office, and residential uses. The purpose of this classification is to concentrate higher intensity land uses for public convenience and enhanced sustainability. Any amendment to a plan area statement that is adopted after the adoption of this Code may retain the name of the Commercial and Public Services Area land use classification, however, Area Plans shall utilize the Mixed-use classification.

TRPA Code of Ordinances

Adopted by Governing Board December 12, 2012 | Amended January 28, 2015 | Page 11-3

MIXED USE

- MU-P-1 Promote the revitalization of Town Centers and Village Centers by encouraging a mixed land use pattern that combines tourist accommodation, residential, commercial, public facilities and public spaces to serve visitors and locals alike.
- MU-P-2 Create distinctive, connected, and walkable districts that have a strong sense of identity.
- MU-P-3 Promote site sensitive design and pedestrian-oriented activities in mixed-use developments.
- MU-P-4 Foster high quality design, diversity, and a mix of amenities in new residential, commercial and tourist accommodation, where appropriate.
- MU-P-5 Establish design standards for mixed-use tourist districts that build on the existing tourist recreation theme with high-quality storefronts designed to attract tourists, and meet the needs of local residents.
- MU-P-6 Support future Regional Plan amendments that promote redevelopment of Village Centers and other mixed use areas that are not included in a Town Center.

The request to allow mixed uses in commercial areas and site and building standards for mixed-use districts is more than what the old community plans analyzed. There are greater impacts to allowing mixed uses outside town centers which were zoned differently in the Plan Area Statements. The implication that nothing is changing in areas outside town centers is incorrect. Mixed-uses in Town centers and outside town centers do not have separate criteria. TRPA and Placer County must develop criteria for Town centers versus outside Town Centers mixed use ordinances to provide clarity and insure the correct level of environmental analysis and achievement of thresholds.

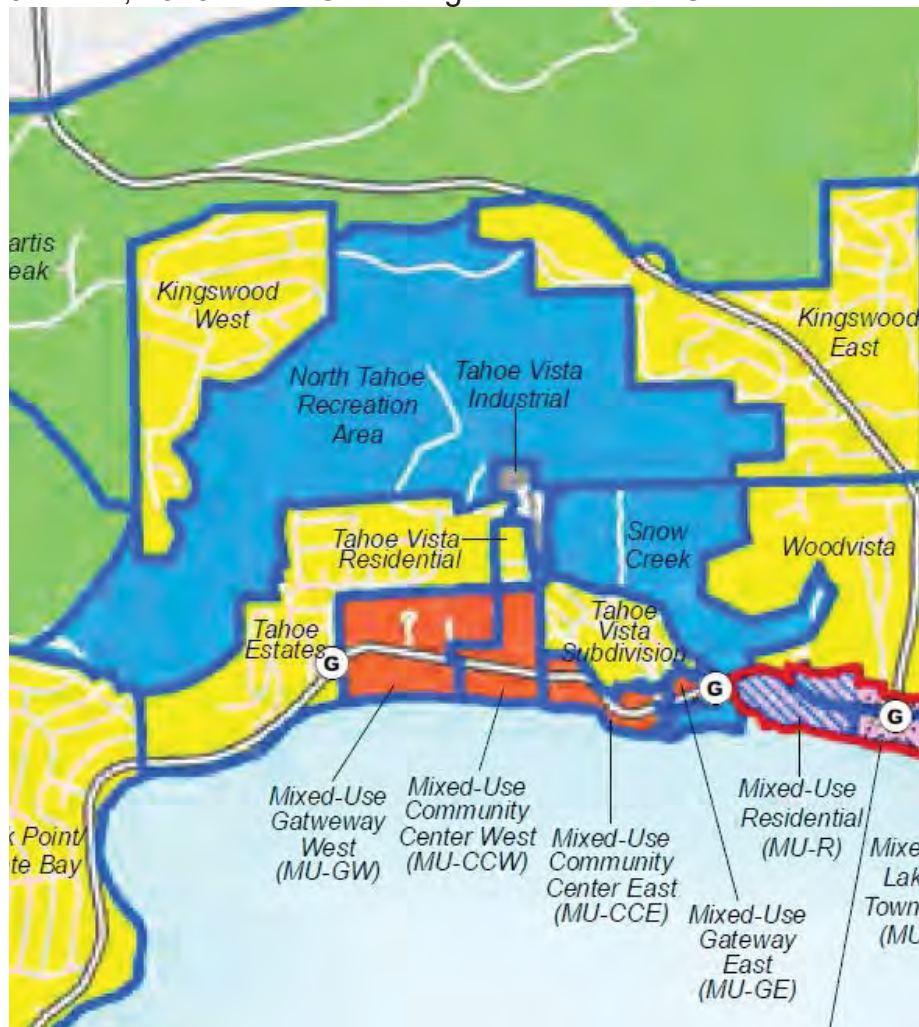
4.1 Land Use Strategy

This Land Use Plan promotes redevelopment of the built environment, multi-modal transportation options and enhanced economic conditions. Regional Plan incentives for compact and environmentally sensitive redevelopment are applied in the Town Centers of Tahoe City, Kings Beach and North Stateline. Incentives to transfer development from sensitive lands and outlying areas to these Centers are also provided.

Additional amendments are implemented for the lower intensity Village Centers throughout the Plan area. In these traditionally commercial nodes, the Plan promotes mixed land uses, environmental gain and high quality design. Village Centers include Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista.

Tahoe Vista map as related to mixed use mapping.

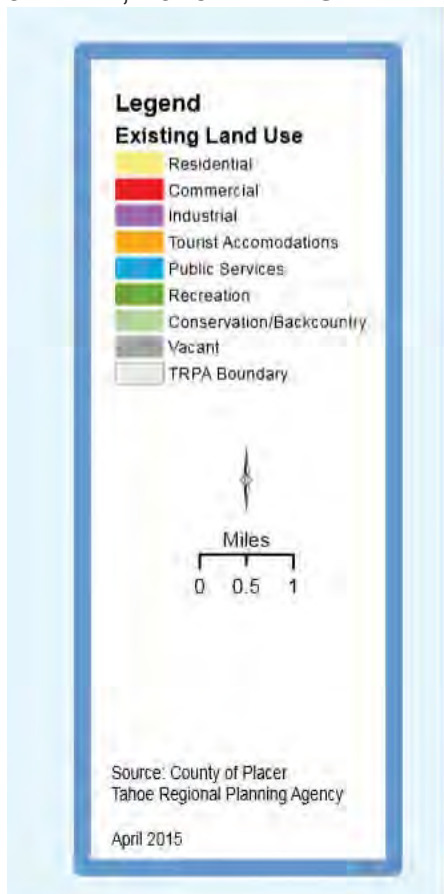
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Also provide clarification and applicability to zoning for Tahoe Vista Special Area #6

Noted under Residential Subdistricts (Section 2.03) but this is a Tourist zone and not a mixed use area but the map below shows a tourist component.

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<i>Subdistrict</i>	<i>Regional Plan Land Use Designation</i>	<i>Previous Plan Area Statement (PAS)</i>
Homewood/Residential	Residential	160 Homewood/Residential
Kings Beach Residential	Residential	028 Kings Beach Residential
Kingswood East	Residential	025 Kingswood East
Kingswood West	Residential	020 Kingswood West
Lake Forest	Residential	008 Lake Forest
Lake Forest Glen	Residential	007 Lake Forest Glen
Mark Twain Tract	Residential	172 Mark Twain Tract
McKinney Tract	Residential	158 McKinney Tract
Rocky Ridge	Residential	005 Rocky Ridge
Sunnyside/Skyland	Residential	164 Sunnyside/Skyland
Tahoe Estates	Residential	021 Tahoe Estates
Tahoe Park/Pineland	Residential	170 Tahoe Park/Pineland
Tahoe Pines	Residential	161 Tahoe Pines
Tahoe Vista Residential	Tourist	022 Tahoe Vista CP Special Area #6

Tourist

Tourist areas are urban areas that have the potential to provide intensive tourist accommodations and services or intensive recreation. This land use classification also includes areas recognized by the Bi-State Compact as suitable for gaming. These lands include areas that are: already developed with high concentrations of visitor services, visitor accommodations, and related uses; of good to moderate land capability (land capability districts 4-7); with existing excess land coverage; and located near commercial services, employment centers, public services and facilities, transit facilities, pedestrian paths, and bicycle connections.

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Residential

Residential areas are urban areas having potential to provide housing for the residents of the Region. In addition, the purpose of this classification is to identify density patterns related to both the physical and manmade characteristics of the land and to allow accessory and non-residential uses that complement the residential neighborhood. These lands include: (1) areas now developed for residential purposes; (2) areas of moderate-to-good land capability; (3) areas within urban boundaries and serviced by utilities; and (4) areas of centralized location in close proximity to commercial services and public facilities.

PUBLIC REVIEW DRAFT Implementing Regulations

- Z. **Tahoe Vista Residential Subdistrict.** The Tahoe Vista Residential Subdistrict is located within the North Tahoe West Subarea. This area should continue to be residential, maintaining the existing character of the neighborhood.
1. *Special Designation.* None.
 2. *Special Policies.* None.
 3. *Permissible Uses.* The following primary uses may be permitted within all or a portion of the Subdistrict. The list indicates if the use is Allowed (A), subject to an Administrative Review Permit (C), or must be considered under the provisions for a Conditional Use Permit (CUP) or Minor Use Permit (MUP). Existing uses not listed shall be considered nonconforming uses within this Subdistrict. The establishment of new uses not listed shall be prohibited.

TABLE 2.03.Z-1: LAND USE REGULATIONS-TAHOE VISTA RESIDENTIAL SUBDISTRICT		
Allowable Land Uses	Land Use Permit	Add'l Regs.
Residential		
Employee Housing	A	
Mobile Home Dwelling	MUP	
Multiple Family Dwelling	A	
Multi-Person Dwelling	A	
Residential Care	A	
Single-Family Dwelling	A	
Public Service		
Religious Assembly	MUP	
Day Care Centers – Pre-Schools	A	
Local Public Health and Safety Facilities	MUP	
Schools – Kindergarten through Secondary	MUP	
Pipelines and Power Transmission	CUP	
Transit Stations and Terminals	CUP	
Transportation Routes	CUP	
Transmission and Receiving Facilities	MUP	Placer County Code, Section 17.56.060.F
Recreation		
Cross Country Ski Courses	MUP	
Day Use Areas	A	
Developed Campgrounds	CUP	
Recreational Vehicle Parks	CUP	
Riding and Hiking Trails	MUP	
Rural Sports	CUP	

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The implementing ordinance above states there are no Special Areas but Special Area #6 (022) does exist today. Update Tahoe Vista Residential Subdistrict table

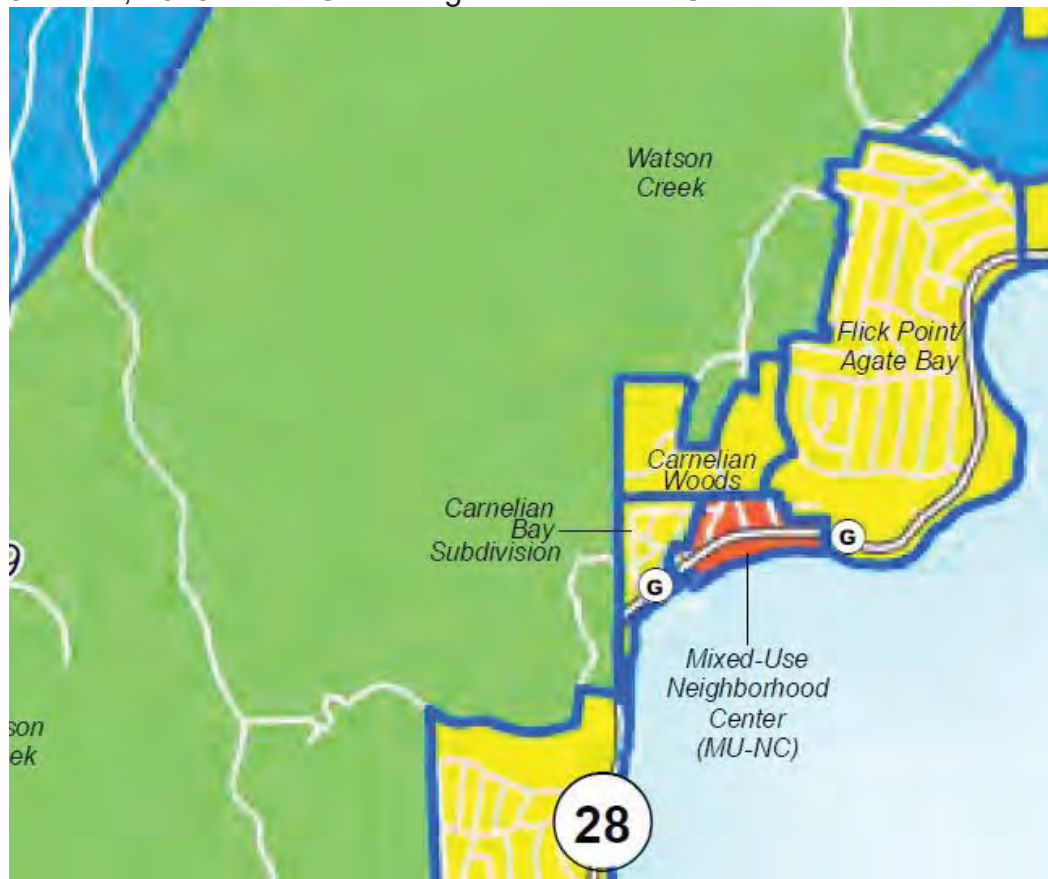
VILLAGE CENTERS

The smaller Village Centers of Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista contain a variety of uses but are not identified in the Regional Plan or eligible for its Town Center incentives. Village Centers face many of the same challenges as the larger Town Centers, including development in SEZs, excess land coverage, scenic non-attainment ratings and a general need for property upgrades.

This Area Plan encourages redevelopment in the Village Centers and implements the programs that are allowed under the Regional Plan. Area Plan programs that apply in the Village Centers include mixed use zoning, revised parking regulations, new design standards and secondary dwelling units. Also included are plans to complete trail connections, enhance transit service, and advocate for additional redevelopment incentive programs in the Regional Plan.

The same confusion for Carnelian Bay as a Village Center versus a Neighborhood Center. No definition of neighborhood center is provided. Provide clarification and identify applicable TRPA code.

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The environmental documentation should provide Existing Land Tables for the non-Town Center Areas: of North Tahoe West sub-area and West Shore sub-area to allow the public/agencies commenting to better understand the existing make-up of those areas and what the mixed-use overlay allowables will impact. Provide detailed environmental analysis of how the mixed-use incentives will impact the non-Town Center sub-areas. A Table just like 4.2 Existing Land Use

4.2 Existing Land Use

LAND USE MIX

Existing land uses are listed on Table 4.2-A and are mapped on Figures 4-1 (Plan area map), 4-2 (Kings Beach map) and 4-3 (Tahoe City map).

Over 85 percent of the Plan area includes undeveloped and protected land.

About 75 percent of the Plan area is used for conservation and backcountry purposes. Conservation lands include U.S. Forest Service lands within the Tahoe National Forest and open spaces that are managed by other agencies. About 4 percent of the conservation lands are privately owned and used primarily for timber production.

Table 4.2-A: Existing Land Uses

<i>Land Use</i>	<i>Acres</i>	<i>Percent</i>
Residential	3,558	7.7%
Commercial	177	0.4%
Tourist Accommodations	75	0.2%
Industrial	48	0.1%
Public Services	313	0.7%
Vacant	1,247	2.7%
Recreation	4,744	10.2%
Conservation/Backcountry	35,030	75.4%
Right of Way	1,209	2.6%
Total	46,402	100.0%

Source: Placer County Assessor, 2013; Dyett & Bhatia, 2013.

The EIR/EIS must provide scientific evidence of environmental gain. The team members have asked on countless occasions to have TAUs and CFA be broken down by sub-area to determine the appropriate planning levels and if environmental gain and threshold attainment are achievable. The EIR/EIS should include a table providing a breakdown of the current CFA and TAUs by all sub-areas.

The information in the Land Use section Table 4.3-D Placer County CFA Supply (below) is inconclusive and not complete. The West Shore should be included.

Tahoe Vista and Carnelian Bay are now one sub-area. The EIR/EIS must analyze the 1,250 CFA that now can be transferred to the old Tahoe Vista Community Plan Area as zero exists.

Provide a map in the EIR/EIS of where the 21,888sf Area-wide CFA is located..

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The supply of CFA and TAUs are limited - and like residential development - can be transferred between properties through Regional Plan programs. For transfers to Town Centers, the ratios are 1:3 for SEZ lands and 1:2 for other sensitive lands. There is no distance multiplier.

Commercial Floor Area (CFA)

Placer County's CFA supply totals 72,609 square feet (Feb 2015). Placer County may assign this CFA with project approvals. Some CFA is reserved for certain areas and some is available throughout the Plan. The County's current CFA supply is listed on Table 4.3-D.

TRPA also has a CFA supply that is used for development transfer bonus units and other programs. The TRPA supply totals 160,347 square feet for the region (Nov 2015). TRPA has an additional 200,000 square feet that may be used once the current supply is exhausted. Utilization of new CFA has been slow.

Tourist Accommodation Units (TAUs)

The supply of TAUs is more restricted than the supply of CFA. Placer County retains 25 TAUs from original 1987 allocations and has since acquired property with additional TAUs. The potential supply for new projects is shown on figure 4.3-E. The TRPA supply for development transfer incentives is only 122 for the entire region.

Table 4.3-D: Placer County CFA Supply

<i>Location of Use</i>	<i>Square Feet</i>
Kings Beach	20,816
Tahoe City	20,699
Carmelian Bay	1,250
Tahoe Vista	0
Stateline	4,500
Kings Beach Industrial	3,456
Area-Wide	21,888
Total	72,609

Source: Placer County and TRPA, 2015.

Table 4.3-E: Placer County TAU Supply

<i>Location of Use</i>	<i>Units</i>
Tahoe City – Remaining from 1987 Plan	25
Kings Beach – Kings Beach Center	10
Kings Beach – Owned by Redevelopment Successor Agency; Eastern Gateway	6
Kings Beach – Units committed and in process; Community House	8
Total Available or in Process	49

Source: Placer County and TRPA, 2015.

Additionally the EIR/EIS must provide detailed environmental analysis of the impacts of the proposed 400 new TAU's in two Town Centers as this was not analyzed in the Regional Plan Update. The proposed conversion rate has not been sufficiently analyzed by TRPA. Placer County must provide additional analysis for the proposed conversion rate factor.

In addition, explain how requesting 400 new TAU's through the conversion program is not violating the Regional Plan Growth Management system and creating additional environmental impacts as no new TAU's were analyzed in the RPU. Identify/provide a table how many TAU's already exist in the Area Plan boundary broken down by sub-areas. Calling it a pilot program does not negate environmental analysis.

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CHAPTER 50: ALLOCATION OF DEVELOPMENT

50.5 Allocation of Additional Residential Units

50.4.2 2013 Additional Allocations

TABLE 50.4.1-1: ALLOCATION AND DEVELOPMENT RIGHTS ACCOUNTING			
ALLOCATIONS/ DEVELOPMENT RIGHTS	USED 1987-2012	REMAINING FROM 1987 PLAN ¹	2013 ADDITIONS
Residential Allocations	5,973	114	2600
Residential Bonus Units	526	874	600 ²
Tourist Bonus Units	58	342	0
Commercial Floor Area (Total) (square feet)	416,421	383,579	200,000 ³
Placer County	128,623	72,609	
Washoe County	87,906	2,000	
Douglas County	45,300	36,250	
El Dorado County	15,250	36,150	
City of South Lake Tahoe	77,042	52,986	
TRPA Special Project and CEP Pool	62,300	183,584	
<p>Note 1: 158,816 sq. ft. of Commercial Floor Area, 245 Residential Bonus Units and 90 Tourist Bonus Units have been reserved or allocated to projects (e.g., Community Enhancement Projects) that have not been permitted or permitted but not built are accounted for in the "Remaining from 1987 Plan" column. The 114 remaining residential allocations were distributed to local governments in 2012, but have not been built.</p> <p>Note 2: 600 Residential Bonus Units shall be used only in Centers.</p> <p>Note 3: 200,000 sf of CFA shall only be made available after the 383,579 sf of remaining CFA is exhausted.</p>			

4.3 TRPA Growth Control System

TRPA has implemented a strict growth control system under the Bi-State Compact and Regional Plan. The system is designed to complement the region's development standards and improvement programs to achieve and maintain the Thresholds. Programs described in this section are outlined in TRPA Code Chapters 39 through 53, which remain in place under this Area Plan.

Upon adoption, certain aspects of the TRPA growth control program were litigated extensively, appealed to the U.S. Supreme Court, and ultimately upheld as lawful.

At a basic level, TRPA administers a cap-and-trade system for different types of development rights and for land coverage. These "commodities" can be bought and sold separately from the property from which they originate. In some cases, the commodities can be "transferred" to other locations, "banked" for future use or "converted" into other types of commodities. Overall, the TRPA growth control system limits the Region's capacity for development.

Amendments in the 2012 Regional Plan and this Area Plan are targeted to specific issues and do not alter the comprehensive foundations of the regional growth management framework, which includes the following components:

- Subdivisions that would create new development potential are prohibited.
 - Parcels that legally existed prior to July 1, 1987 were either assigned one residential development right (which may or may not be constructed on site) or were authorized for non-residential development.
 - In order to construct a residential unit, tourist unit or commercial space, development allocations must be obtained. Allocations are released slowly through a complicated system that requires various forms of environmental improvement in exchange for development allocations. Maximum build out of the Region is established with caps for all land use commodities, which include residential units (residential development rights and allocations), commercial floor area (CFA), and tourist accommodation units (TAUs).
- ▲ **Limited Conversion of CFA to TAUs.** The Area Plan would establish a pilot program for the limited conversion of commercial floor area (CFA) to tourist accommodation units (TAUs) for existing development (held by property owners) and for the CFA supply held by Placer County. The program builds upon the conversion standards currently being developed for the TRPA bonus pool of CFA and TAUs. Limitations include:
- (1) converted units may only be used in Placer County Town Centers;
 - (2) sites must have best management practices (BMP) certificates;
 - (3) sites must have sidewalk access;
 - (4) sites must be within 0.25 mile of a transit stop;
 - (5) no more than 400 additional TAUs may be established in Placer County through this pilot program and other actions combined; and
 - (6) the program will be periodically monitored for efficacy, possible extension and consideration of program adjustments.

The proposed conversion rate is consistent with the conversion rate being developed by TRPA for bonus units: 1 TAU = 454 square feet of CFA.

The EIR/EIS must provide detailed environmental analysis of the impacts associated with the proposed non-contiguous parcels for projects as there is the potential for increased VMT which could cause additional air and water quality issues by allowing this option with more than one site location for a project. This was not analyzed in the Regional Plan Update.

- ▲ **Allow a Project Area to Include Non-Contiguous Parcels.** This program would allow a project site to include non-contiguous parcels within Town Centers. To utilize this program, all project components must be located on developed land in a mixed-use zoning district within a Town Center, and all applicable development standards would still apply. Projects proposing this option would require TRPA approval.

The following suggested Policy Document Goal should not be a proposed Goal within the Placer Policy Document until there is an analyzed, approved amendment to the TRPA Regional Plan.

Goal DP-G-3 Encourage consolidation of development and restoration of sensitive lands to a naturally-function condition through transfer of development rights and transfer of land coverage programs. Consider a revised allocation program that allows for inter-jurisdictional transfers and conversion of tourist accommodation units to commercial floor area.

The Socio Economic section of the EIR/EIS should include a table showing the number of affordable units existing to date within each community listed. Those units should include trailer park unit counts, the Domus project, any hotels/motels currently known to be used as affordable housing (examples: Little Bear Cottages, Kings Beach and a portion of the Tahoe Vistana in Tahoe Vista). An accurate accountability will assist in the overall planning necessary to determine the number of units needed and where they should be located to assure fair-share affordable housing located in each community in support of the Regional Plan goals and Area Plan goal for walkable, bikeable, livable, workable communities and especially a reasonable balance in the Town Centers of Tahoe City and Kings Beach.

SE-P-6 Continued efforts to address the existing job-housing imbalance and provide additional housing at affordable price levels should be pursued.

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The EIR/EIS must provide detailed environmental analysis of the impacts associated with the proposed secondary residences as there is the potential for increased VMT and density in neighborhoods which could cause additional air and water quality issues by allowing this option with more than one home on lots less than an acre. This was not analyzed in the Regional Plan Update.

- ▲ **Secondary Residences.** This program would expand upon Section 21.3.2 of the TRPA Code to allow market-rate secondary residential units on certain residential parcels less than 1 acre in size, subject to BMP certification, TRPA Code requirements (including allocations), and supplemental design standards. To qualify for the program, properties must be located within 0.25 mile of a mixed-use zoning district or primary transit route. Secondary units may not be used as tourist units or converted to TAUs.

Add that these units cannot be used for commercial purposes as stated in TRPA code. Define if these units are also for affordable deed restricted uses.

21.3.2. Secondary Residence

One secondary residence shall be considered an accessory use to the primary use it serves and may be permitted where the primary use is a permissible use. Secondary units may include a guest house; an affordable or market-rate rental unit; a caretaker residence for a

TRPA Code of Ordinances

Adopted by Governing Board December 12, 2012 | Amended January 28, 2015 | Page 21-3

CHAPTER 21: PERMISSIBLE USES

21.3 Accessory Uses

21.3.2 Secondary Residence

residential use, commercial use, public service or recreational use; and a manager's quarters for a tourist accommodation or multi-residential use. A secondary residence shall be considered a residential unit subject to the residential allocation limitations and transfer provisions. If the primary use is residential, a secondary unit may be permitted only if either subparagraph 21.3.2.A.1 or 21.3.2.A.2 below is met.

A. Residential Secondary Unit Parcel Size

A secondary residence may be permitted as accessory to a single-family house if:

1. The parcel on which the residence is located is greater in size than one acre; or
2. The parcel on which the secondary residence would be located is within a jurisdiction certified by TRPA to possess an adequate local government housing program and the secondary unit is restricted to affordable housing.

B. TRPA-Certified Local Government Housing Program

TRPA may certify by resolution a local government housing program upon a finding that it adequately addresses, at a minimum, subparagraphs 1 through 3 below.

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There will be unintended consequences of increased density in residential neighborhoods with the proposed secondary unit on less than an acre. The EIR/EIS should provide a table that includes the APN's for each vacant lot broken down by Community as noted in Table 4.3-A. Additional environmental analysis and site specific restrictions must be identified based on coverage and must be analyzed in the EIR/EIS.

Also identify CTC asset lots within each community listed on Table 4.3-A. Identify on a map in the EIR/EIS as there is a potential for future sale and development of those lots and secondary residences which could cause unforeseen environmental impacts by allowing increased density in residential areas above and beyond the already identified vacant lots and proposed secondary unit allowances.

Provide several individual maps with more specificity than Figure 4.8 which is impossible to read and discern the various categories.

Identify on separate maps by subarea: the lots that are eligible for a secondary units, mixed-use ¼ mile buffer, tourist planned development, transit route ¼ mile buffer on separate maps.

Also provide maps by each sub-area identifying the vacant lots as that map is impossible to read.

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Originally, only parcels with an IPES score of 726 (the IPES Line) or higher were considered “buildable.” The IPES Line was designed to lower over time as more environmental restoration projects were completed. In most local jurisdictions, the IPES Line has dropped to a score at which every vacant parcel that is not located in a SEZ is buildable. However, because of historic development patterns and the way the IPES system has been implemented, the Placer County IPES Line remains at 726.

IPES scores also indicate the percentage of allowable coverage on a site. In some cases, additional coverage can be purchased and transferred to a site. Base allowable coverage (coverage assigned to a property) or the maximum allowable coverage (maximum coverage a property may have pursuant to land coverage transfers), whichever is greater, determines the percentage of coverage that may occupy the parcel.

As shown in Table 4.3-A, the Plan area contains 441 vacant residential parcels with an IPES score equal or greater to 726. These vacant sites are mapped in Figure 4-5 and are considered “buildable” home sites. Additional home sites may also be “buildable” under TRPA programs or if the Placer County IPES line drops.

Table 4.3-A: Vacant Parcels with IPES \geq 726

<i>Community</i>	<i>Parcels</i>	<i>Acres</i>
Carnelian Bay	84	57.7
Tahoe Vista	100	34.8
Tahoe City	69	28.7
Homewood	56	22.7
Kings Beach	89	18.5
Dollar Point	26	8.9
Tahoma	17	5.2
Total	441	176.5

Source: Placer County, 2013; TRPA, 2013.

The vacant sites range in size from 0.1 acres to nine acres. The majority of parcels—69 percent—are located north of the SR 28 and SR 89 intersection in the communities of Carnelian Bay, Tahoe Vista and Kings Beach. The largest parcels are located in Carnelian Bay, while the smallest parcels are primarily located in Kings Beach.

Placer should require that the ski resorts provide pick-up and return shuttles from affordable housing areas.

Providing in-lieu fees toward affordable housing doesn’t necessarily accomplish getting the units built. Provide financial feasibility information on what is needed in the in-lieu fee pool to build an affordable housing complex. Fair share number of affordable units in both Town Centers should be identified in the EIR/EIS.

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HOUSING

- | | |
|--------|--|
| HS-P-1 | Provide affordable and employee housing within the Plan area and encourage employee shuttles to major employers, such as ski resorts and casinos. |
| HS-P-2 | Require larger scale commercial, recreational, and tourist accommodation projects to contribute their fair share toward providing employee housing. |
| HS-P-3 | Multi-residential bonus units may be utilized for affordable and/or employee housing projects. |
| HS-P-4 | Provide opportunities for affordable housing, including senior housing in appropriate areas where public transportation is easily available, close to neighborhood serving retail facilities, and where such development will be compatible with surrounding land uses. |
| HS-P-5 | Allow for secondary residences on parcel sizes less than one acre in size within ¼ mile of Mixed Use areas and transit routes and restrict such units to residential use. |
| HS-P-6 | Pursue TRPA-Certified Local Governing Housing Programs pursuant to Sections 21.3.2.B, 52.3.4 and 52.3.6 of the TRPA Code of Ordinances to provide additional opportunities for deed-restricted affordable and moderate income housing. |
| HS-P-7 | Evaluate housing needs in the region in coordination with TRPA. Consistent with Regional Plan Housing Policy HS-3.1, update TRPA policies and ordinances as necessary to achieve state, local and regional housing goals. Future housing efforts should seek to remove identified barriers preventing the construction of necessary affordable housing in the region including, but not limited to, workforce and moderate -income housing, secondary residential units and long -term residency in motel units. |

Provide detailed criteria for when the Placer Administrative Review Permit process is used versus Planning Commission and Board of Supervisor review process.

17.58.100 Administrative review permits.

When an administrative review permit (ARP) is required by Sections 17.52.130(B)(1)(b), (B)(1)(d) or 17.56.170(B)(1) to authorize a proposed land use, the permit shall be processed as set forth in Sections 17.58.020 et seq., (Applications—Filing and initial processing), except as follows:

A. Notice Not Posted and Public Hearing Not Held. Notice to the public shall be provided as set forth in Section 17.60.140(A)(3), except for the requirement to post a notice on the property which is the subject of the permit application, and a public hearing is not conducted.

B. Final Action. After completion of a staff report pursuant to Section 17.58.070, the zoning administrator shall take action on an administrative review permit application as follows:

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1. The zoning administrator shall consider information presented about the project proposed in the administrative review permit application, in the staff report, in any accompanying environmental documents and comments received on such documents, in any correspondence received, from any field review, and from any other information made part of the record.

2. Within the time limits specified by Section 17.58.160(A) (Time Limits for Action by County), the zoning administrator shall, approve any proposed negative declaration, or other appropriate environmental document required by Chapter 18 of this code, and shall approve, approve subject to conditions, or disapprove the administrative review permit.

3. Approval or conditional approval shall be granted only where the zoning administrator can make the findings required by Section 17.58.140(A) (Permit Issuance—Findings Required for Approval), and the permit shall be denied where the findings cannot be made. The zoning

administrator may approve an administrative review permit subject to conditions, as set forth in Section 17.58.140(B).

4. The decision of the zoning administrator shall be in writing, including all findings that were made as the basis for the decision.

C. Appeal. Decisions of the zoning administrator on administrative review permits may be appealed to the planning commission, in accordance with Section 17.60.110 (Appeals).

D. Referral to Planning Commission. As provided by Section 17.60.030(C), the planning director or zoning administrator may refer an administrative review permit to the planning commission for a public hearing, consideration, and approval or disapproval pursuant to the procedures specified by Section 17.58.130 (Conditional use permits). Such referral may occur at the discretion of the planning director or zoning administrator when it is deemed necessary because of policy implications, unique or unusual circumstances, the size of the project, or other factors determined by the planning director or zoning administrator to be significant enough to warrant planning commission review. (Ord. 5126-B, 2001)

Utilizing the Mixed-use moniker outside Town Centers was not analyzed in the Regional Plan for the increases or associated impacts of the expansion of the existing use. This was only done for Town Centers. Provide detailed environmental analysis utilizing the baseline of all areas (sub-districts) outside town centers based on current Plan Area Statement restrictions. Any prior environmental documentation and analysis, Plan Area Statement environmental analysis, etc. must be consulted and used as the baseline for analysis of sub-area sub-districts to determine environmental threshold standard attainment is achievable.

7. **Mixed-Use (Formerly Commercial and Public Service Areas)**

Mixed-use areas are urban areas that have been designated to provide a mix of commercial, public services, light industrial, office, and residential uses to the region or have the potential to provide future commercial, public services, light industrial, office, and residential uses. The purpose of this classification is to concentrate higher intensity land uses for public convenience and enhanced sustainability. Any amendment to a plan area statement that is adopted after the adoption of this Code may retain the name of the Commercial and Public Services Area land use classification, however, Area Plans shall utilize the Mixed-use classification.

TRPA Code of Ordinances

Adopted by Governing Board December 12, 2012 | Amended January 28, 2015 | Page 11-3

Mixed-use outside town centers creates higher intensity and more incentives outside town centers which is not what the RPU analyzed. The Placer County Area Plan cannot tie on this issue of more intensity outside town centers and must analyze from the original baseline Plan Area Statement designations of commercial, public service, industrial, etc. as well as Conservation, Mitigation, Scenic Restoration, etc.

This is undoing the original community planning structure in the Tahoe basin by the allowance of the combination of many different uses allowed/located at one parcel.

This is an example of why an alternative breaking down this proposed gigantic Area Plan to 2-5 area plans is viable : mixed use. Code 11.8.4: The overlay of mixed-use in areas outside town centers is making the request to modify current PAS as previously analyzed thus requiring an amendment/additional environmental analysis for those PAS's outside town centers. Changing the name of Plan Area Statements to Sub-districts is not providing environmental impact analysis where baseline on the ground zoning was residential, commercial, etc. now going to be mixed use.

CHAPTER 11: PLAN AREA STATEMENTS AND PLAN AREA MAPS

11.8 Plan Area Statement and Plan Area Map Amendment

11.8.4 Findings for Plan Area Amendments

11.8.4. Findings for Plan Area Amendments

Prior to adopting any plan area amendment, TRPA shall find:

A. General

The amendment is substantially consistent with the plan area designation criteria in subsections 11.6.2 and 11.6.3; and

B. Expansion of Urban Plan Area Boundary or Addition of Residential, Tourist, Commercial, or Public Service Uses to Non-urban Plan Area

If the amendment is to expand an existing urban plan area boundary or to add residential, tourist accommodation, commercial, or public service as permissible uses to a non-urban plan area, TRPA shall find that the amendment will make the plan area statement consistent with an adopted policy or standard of the Regional Plan, and that the amendment will satisfy one or more of the following criteria:

1. The amendment corrects an error that occurred at the time of adoption, including but not limited to a mapping error, an editing error, or an error based on erroneous information; or
2. The amendment enables TRPA to make progress toward one or more environmental thresholds without degradation to other thresholds as measured by the Chapter 16: *Regional Plan and Environmental Threshold Review*, indicators; or
3. The amendment is needed to protect public health and safety and there is no reasonable alternative.

C. Addition of Multiple-Family as Permissible Use

1. If the amendment proposes to add multiple-family as a permissible use to a plan area or for one or more parcels, except as provided for in subparagraph 3 below, the plan area or affected parcel shall be found suitable for transit-oriented development (TOD). When determining TOD suitability, TRPA shall find that the site contains the following features, or functional equivalents, that facilitate TOD in a manner that is equal or superior to the listed features:
 - a. Access to operational transit within one-half mile walk;
 - b. Neighborhood services within one-half mile walk (e.g., grocery/drug stores, medical services, retail stores, and laundry facilities);
 - c. Good pedestrian and bike connections;
 - d. Opportunities for residential infill (at densities greater than eight units per acre) or infill with mixed uses; and
 - e. Public facilities adequate to service increased demand from the addition of multi-family units (e.g., public schools, urban or developed recreation sites, government services, and post offices).

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The mixed-use moniker outside town centers misleads the public in believing height and density incentives are not available by stating they cannot be the same as town center incentives in Table 13.5.3.1 but the mixed- overlay does allow additional incentives in chapter 30.4.2 Transferred land –coverage

By allowing the mixed-use overlay outside town centers the following coverage incentives apply. Residential coverage is very specific as stated in table 30.4.2-1

30.4.2. Transferred Land Coverage Requirements

In addition to the base land coverage prescribed by subsection 30.4.1, land coverage may be transferred to a parcel pursuant to subsection 30.4.3. Parcels and uses eligible for transfer of land coverage are identified in this subsection. For purposes of this subsection, the "maximum land coverage" equals the base land coverage plus the transferred land coverage. Land coverage shall not exceed base land coverage for parcels and uses that are not identified in this subsection. The aggregate of base land coverage and transferred land coverage shall not exceed the limits set forth in this subsection.

A. General Standards Applicable in All Locations

1. Residential Facilities (One to Four Units)

The maximum land coverage allowed on a parcel for residential facilities of four units or less shall be the land coverage allowed pursuant to the coefficients in Table 30.4.2-1, or as follows, whichever is greater:

a. Maximum Parcel Coverages

TABLE 30.4.2-1: MAXIMUM PARCEL COVERAGE	
Project Area (Sq. Ft.)	Maximum Land Coverage
0 - 4,000	Base Land Coverage Only
4,001 - 9,000	1,800 sq. ft.
9,001 - 14,000	20% of Project Area
14,001 - 16,000	2,900 sq. ft.
16,001 - 20,000	3,000 sq. ft.
20,001 - 25,000	3,100 sq. ft.
25,001 - 30,000	3,200 sq. ft.
30,001 - 40,000	3,300 sq. ft.
40,001 - 50,000	3,400 sq. ft.
50,001 - 70,000	3,500 sq. ft.

TRPA Code of Ordinances

Adopted by Governing Board December 12, 2012 | Amended January 26, 2015 | Page 30-24

2. Commercial Facilities Within Community Plans

Unless otherwise provided in subparagraph A, the maximum land coverage) base land coverage plus transferred coverage) allowed on a parcel for commercial and mixed-use facilities located within community plans approved pursuant to Chapter 12, but not within a Center of a Conforming Area Plan is as follows:

- a. For parcels upon which there is no development legally existing as of July 1, 1987, and for areas within 300 feet of the high Water Line of Lake Tahoe (excluding those areas landward of State highways in the Tahoe City and Kings Beach Town Centers), maximum land coverage shall be 70 percent of the project area that is located within Land Capability Districts 4 through 7, inclusive; and
- b. For parcels upon which there legally exists development as of July 1, 1987, maximum land coverage shall be 50 percent of the project area that is located within Land Capability Districts 4 through 7, inclusive.

The EIR/EIS must provide maps showing the existing zoning with an overlay of mixed-use to non-Town Center sub-areas to determine the changes from baseline to mixed-use and the environmental impacts because of the allowances that come with the mixed-use zoning classification. There are many combinations of allowed mixed uses as provided in TRPA code 31.5.2

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31.5.2. Mixed Uses

For two or more uses, the maximum densities shall be established through the following process: (1) determine the category or categories of mixed use on the parcel or project area, pursuant to subsection A below; and (2) determine the rules applicable to that category of mixed use pursuant to subsection B below.

A. Categories of Mixed Use

The category of the mixed use shall be determined from the following table. Select the first proposed use from the left-hand column and the second proposed use from the top-level row. Any other combination of uses not shown in the table, including three or more uses in any project area, is assigned to Category F.

TABLE: 31.5.2-1: CATEGORIES OF MIXED USE					
	Single-Family Dwelling Summer Home	Multi-Family Dwelling Mobile Home Dwelling Multi-Person Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	Other Tourist Accommodation (less than 10% kitchens) Other Tourist Accommodation (greater than or equal to 10% kitchens)	Developed Campgrounds Recreation Vehicle Parks Group Facilities	Commercial use Public Service Use Other Recreational Use Resource Management
Single-Family Dwelling Summer Home		A	A	A	D
Multi-Family Dwelling Mobile Home Dwelling Multi-Person Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	A	B	B	B	m
Other Tourist Accommodation (less than 10% kitchens) Other Tourist Accommodation (greater than or equal to 10% kitchens)	A	B	C	B	m
Developed Campgrounds Recreation Vehicle Parks Group Facilities	A	B	B	B	m

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31.5.2. Mixed Uses

For two or more uses, the maximum densities shall be established through the following process: (1) determine the category or categories of mixed use on the parcel or project area, pursuant to subsection A below; and (2) determine the rules applicable to that category of mixed use pursuant to subsection B below.

A. Categories of Mixed Use

The category of the mixed use shall be determined from the following table. Select the first proposed use from the left-hand column and the second proposed use from the top-level row. Any other combination of uses not shown in the table, including three or more uses in any project area, is assigned to Category F.

TABLE: 31.5.2-1: CATEGORIES OF MIXED USE					
	Single-Family Dwelling Summer Home	Multi-Family Dwelling Mobile Home Dwelling Multi-Person Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	Other Tourist Accommodation (less than 10% kitchens) Other Tourist Accommodation (greater than or equal to 10% kitchens)	Developed Campgrounds Recreation Vehicle Parks Group Facilities	Commercial use Public Service Use Other Recreational Use Resource Management
Single-Family Dwelling Summer Home		A	A	A	D
Multi-Family Dwelling Mobile Home Dwelling Multi-Person Dwelling Nursing and Personal Care Residential Care Bed and Breakfast	A	B	B	B	m
Other Tourist Accommodation (less than 10% kitchens) Other Tourist Accommodation (greater than or equal to 10% kitchens)	A	B	C	B	m
Developed Campgrounds Recreation Vehicle Parks Group Facilities	A	B	B	B	m

CHAPTER 31- DENSITY
31.5 Calculation of Maximum Density
31.5.1 Mixed Uses

CATEGORY B: EXAMPLE DENSITY CALCULATIONS

Example 1

A proposed project that contains an equal number of multi-family dwellings and other tourist accommodation units without kitchens.

$$\text{Maximum Density} = \frac{\text{Density of Multi-Family Dwelling (15)} + \text{Density of Other Tourist w/o Kitchens (40)}}{2} = \frac{55}{2} = 27.5 \text{ units/acre} (= 27 \text{ units/acre})$$

On a hypothetical two-acre project, a maximum 55 units would be allowed.

Example 2

A proposed project will contain 2/3 multi-family dwellings and 1/3 other tourist units without kitchens.

$$\text{Maximum Density} = \frac{(2) \times \text{Density of Multi-Family Dwelling (15)} + (1) \times \text{Density of Other Tourist w/o Kitchens (40)}}{3} = \frac{55}{3} = 23.5 \text{ units/acre} (= 23 \text{ units/acre})$$

On a hypothetical three-acre project, a maximum 70 units would be allowed.

3. **Category C**
In Category C, if ten percent or more of the other tourist units have kitchens, the maximum density is 15 units per acre. If less than ten percent of the other tourist units have kitchens, then the maximum density is 40 units per acre.
4. **Category D**
In Category D, the maximum residential density is one unit per project area, provided that residential units are allowed by the plan area statement or community plan, except for mixed-use project proposing to subdivide multi-family units, which is subject to Category E below.
5. **Category E**
In Category E, the maximum density for a multi-family dwelling, multi-person dwelling, or other tourist accommodation use shall be the maximum density for the given residential or tourist accommodation use, as determined by Table 31.3.2-1, multiplied by the ratio of the floor area of that use to the total floor area in the project area (see Examples 1 and 2), subject to the exceptions below.
 - a. If another use with which the residential or tourist accommodation use is to be combined does not lend itself to a calculation of floor area, such

CATEGORY E: EXAMPLE DENSITY CALCULATIONS

Example 1: Vertical Mixed-Use— Density Calculation for Multi-Family Dwelling

For a proposed building that contains a commercial establishment on the ground floor and multi-family dwellings on the second floor, and where each floor has a floor area of 10,000 square feet, the maximum residential density is 7.5 units per acre, calculated as follows:

$$\frac{\text{Floor Area of Multi-Family Dwelling (2000)}}{\text{Total Project Floor Area (4000)}} \times \text{Density of Multi-Family Dwelling (15)} = 7.5 \text{ units/acre}$$

On a hypothetical two-acre parcel, a maximum of 15 dwelling units would be allowed.

Example 2: Vertical Mixed-Use in Two-Story Structure — Density Calculation for Multi-Person Dwelling

For a proposed project that contains a public service use of 3000 square feet on ground floor and a multi-person dwelling of 750 square feet on the second floor, the maximum residential density is 5 persons per acre, calculated as follows:

$$\frac{\text{Floor Area of Multi-Person Dwelling (750)}}{\text{Total Project Floor Area (3750)}} \times \text{Density of Multi-Person Dwelling (25)} = 5 \text{ persons/acre}$$

On a hypothetical two-acre project area, a maximum of 10 persons would be allowed.

Example 3: Horizontal Mixed-Use in Detached Single-Story Structures — Density Calculation for Multi-Family Dwelling

For a proposed project that contains multi-family dwellings and a commercial use in separate structures, the maximum residential density is determined by applying the maximum density in the table in Section 31.3 to the portion of the project area to be devoted to the multi-family use. Thus, if a landowner proposes to use 10,000 square feet of a 50,000-square foot lot for multi-family dwellings, and the remaining 40,000 square feet is proposed for commercial uses, the maximum multi-family dwelling density is 3 units per acre, calculated as follows:

$$\frac{\text{Land Area of Multi-Family Dwelling (10,000)}}{\text{Total Project Floor Area (50,000)}} \times \text{Density of Multi-Family Dwelling (15)} = 3 \text{ units/acre}$$

On the hypothetical 50,000-square foot lot, a maximum of 3 multi-family dwellings would be allowed.

On a hypothetical 45,000-square foot lot, a maximum of 1 multi-family dwelling would be allowed.

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6. Category F

a. Applicability

Category F applies in the following cases:

- (i) When a mobile-home dwelling, bed and breakfast, developed campground, recreational vehicle park, and/or group facilities use is combined with a commercial use, public service use, other recreational use, or resource management use;
- (ii) When more than two uses are combined;
- (iii) When there is a combination of uses not listed in the Table 31.3.2-1; and/or
- (iv) When another use with which a residential or tourist accommodation use is to be combined, such as a park or golf course, does not lend itself to a calculation of floor area the maximum residential or tourist density shall be calculated per this subsection.

b. Density Calculation

(i) Uses Subject to Density Calculation

The project proponent shall designate, as part of the project application, the portion of the project area to be devoted to a residential, tourist accommodation, or developed recreational use. The maximum density established in Section 31.3 shall be applied to that portion of the project area.

(ii) Uses Not Subject to Density Calculation

The maximum densities for uses that are not subject to the density calculations of Category F, such as commercial, public service, other recreational, and resource management uses, shall be determined by other sections of the Code that address land coverage, building height, parking, and other development standards.

7. Category G

In Category G, mixed uses shall be permitted if they otherwise conform to this Code and applicable plan area statement or community plan.

The Implementing Regulations document pages 1-156 include tables by land use designation. The environmental documentation should also include tables broken down by each Sub-area to allow the public to comment on overall sub-area composition and potential environmental impacts or benefits to each of the sub-areas.

Comments on the Placer County Tahoe
Basin Area Plan
Implementing Ordinance

The Draft Tahoe Basin Area Plan EIR/EIS must align the mixed-used districts with the sub-districts for each sub-area to allow the public/agencies a complete picture of an individual sub-area instead of skipping around the implementing regulations documents. This will allow a complete representation of the sub-area to compare all aspects of the sub-area for environmental analysis clarity, mitigation and implementation of plans/policies. Provide a crosswalk of where to find each of the Tables if the documentation is not provided by complete sub-area. Examples of location below which makes it confusing to have to go between documents to view a specific sub-area in its entirety.

TABLE 2.03.Z-1: LAND USE REGULATIONS-TAHOE VISTA RESIDENTIAL SUBDISTRICT		
Allowable Land Uses	Land Use Permit	Add'l Regs.
Residential		
Employee Housing	A	
Mobile Home Dwelling	MUP	
Multiple Family Dwelling	A	
Multi-Person Dwelling	A	
Residential Care	A	
Single-Family Dwelling	A	
Public Service		
Religious Assembly	MUP	
Day Care Centers - Pre-Schools	A	
Local Public Health and Safety Facilities	MUP	
Schools - Kindergarten through Secondary	MUP	
Pipelines and Power Transmission	CUP	
Transit Stations and Terminals	CUP	
Transportation Routes	CUP	
Transmission and Receiving Facilities	MUP	Placer County Code, Section 17.56.060.F
Recreation		
Cross Country Ski Courses	MUP	
Day Use Areas	A	
Developed Campgrounds	CUP	
Recreational Vehicle Parks	CUP	
Riding and Hiking Trails	MUP	
Rural Sports	CUP	

Page 87 of implementing Regulations 1-156

TABLE 2.04.C-1: LAND USE REGULATIONS—NORTH TAHOE WEST MIXED-USE SUBDISTRICTS						
	Town Center Subdistricts					
Use	MU-GW	MU-CCW	MU-CCE	MU-GE	MU-NC	Add'l Regs
Residential						
Single Family Dwelling	MUP (2)	MUP (3)	MUP (3)	A (2)	A (1)	
Multiple Family Dwellings	MUP (2)	MUP (3)	MUP (3)	MUP (2)	MUP (1)	
Multi-Person Dwellings	MUP	MUP		MUP		
Employee Housing	MUP	MUP	MUP	MUP	MUP	
Residential Care		MUP		MUP		
Tourist Accommodation						
Bed and Breakfast Facilities	A	A	MUP	A	A	
Hotels, Motels and Other Transient Dwelling Units	MUP (20 units or more, CUP)	MUP (20 units or more, CUP)	CUP	CUP	MUP (20 units or more, CUP)	
Timeshare (Hotel/Motel Design)	CUP	CUP	CUP	CUP	CUP	
Timeshare (Residential Design)	CUP	CUP	CUP	CUP	CUP	
Commercial						
Auto, Mobile Home and Vehicle Dealers		CUP	CUP			

Page 160 of Implementing Regulations 157-313

Comments for the Record: Placer County Tahoe Basin Area Plan: Implementing Regulations
August 2, 2015 Ellie Waller: Member North Tahoe West Team and Tahoe Vista Resident

TABLE 2.05.E-1: LAND USE REGULATIONS-TAHOE VISTA INDUSTRIAL SUBDISTRICT		
Allowable Land Uses	Land Use Permit	Add'l Regs.
Commercial		
Auto, Mobile Home and Vehicle Dealers	A	
Building Materials and Hardware	A	
General Merchandise Stores Mail Order, and Vending	A	
Nursery	A	
Outdoor Retail Sales	A	
Eating and Drinking Places	MUP	
Food and Beverage Retail Sales	MUP	
Furniture, Home Furnishings and Equipment	A	
Service Stations	CUP	
Amusements and Recreation Services	CUP	
Privately Owned Assembly and Entertainment	CUP	
Animal Husbandry Services	A	
Auto Repair and Service	A	
Broadcasting Studios	A	
Business Support Services	A	
Contract Construction Services	A	
Financial Services	A	

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- D. **Martis Peak Subdistrict.** The Martis Peak Subdistrict is located partially within the North Tahoe East Subarea and partially within the North Tahoe West Subarea. This area should be reserved for moderate to intensive resource management to include timber management programs that enhance the wildlife, recreational, and vegetation resources. Several miles of the main electrical transmission system serving the north and west shores of the California side of Lake Tahoe pass through this subdistrict. A back-up diesel electrical generator facility and electrical switching station are located in Special Area #1.
1. **Special Designation.** None.
 2. **Special Policies.**
 - a. Unimproved roads in the area should be closed and re-vegetated or be brought up to current water quality standards as adopted in the Lake Tahoe Water Quality Management Plan (208 Plan) to eliminate associated erosion problems.
 - b. Water diversions on Griff Creek should not be allowed to impact the stream fishery.
 - c. New or expanded public utility center facilities are limited to Special Area #1. The location of these facilities shall be limited to high capability land outside of the 100-year flood plain.
 - d. Any new electrical substation in Special Area #1 shall be contingent on the removal of the substation on Cutthroat Avenue in the Kings Beach Industrial Community Plan Area.
 3. **Permissible Uses.** The following primary uses may be permitted within all or a portion of the Subdistrict. The list indicates if the use is Allowed (A), subject to an Administrative Review Permit (C), or must be considered under the provisions for a Conditional Use Permit (CUP) or Minor Use Permit (MUP). Existing uses not listed shall be considered nonconforming uses within this Subdistrict. The establishment of new uses not listed shall be prohibited.

TABLE 2.06.D-1: LAND USE REGULATIONS-MARTIS PEAK SUBDISTRICT		
Allowable Land Uses	Land Use Permit	Add'l Regs.
Residential		
Summer Homes	MUP	
Public Service		
Transmission and Receiving Facilities	CUP	Placer County Code Section 17.56.060.F
Transportation Routes	CUP	
Pipelines and Power Transmission	CUP	
Public Utility Centers	CUP	Limited to Special Area #1
Local Public Health and Safety Facilities	MUP	
Recreation		
Day Use Areas	MUP	



TABLE 2.04.B-6: SHOREZONE-NORTH TAHOE EAST MIXED-USE SUBDISTRICTS		
Tolerance Districts	6	7
Maximum Community Noise Equivalent Level (CNEL)		
Shorezone	55	55
Lakezone	50	50
Primary Uses		
Water- Oriented Outdoor Recreation Concessions	S	S
Beach Recreation	A	A
Waterborne Borne Transit	A	A
Tour Boat Operations	S	S
Safety and Navigation Facilities	A	A
Marinas	S	S
Boat Launching Facilities	S	S
Salvage Operations	S	S
Accessory Structures		
Buoys	A	A
Piers	A	A
Fences	S	S
Boat Ramps	A	A
Breakwaters or Jetties	S	S
Shoreline Protective Structures	S	S
Water Intake Lines	A	A
Floating Platforms and Docs	A	A

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TABLE 2.04.B-6: SHOREZONE-NORTH TAHOE EAST MIXED-USE SUBDISTRICTS		
Tolerance Districts	6	7
Maximum Community Noise Equivalent Level (CNEL)		
Shorezone	55	55
Lakezone	50	50
Primary Uses		
Water-Oriented Outdoor Recreation Concessions	S	S
Beach Recreation	A	A
Waterborne Transit	A	A
Tour Boat Operations	S	S
Safety and Navigation Facilities	A	A
Marinas	S	S
Boat Launching Facilities	S	S
Salvage Operations	S	S
Accessory Structures		
Buoys	A	A
Piers	A	A
Fences	S	S
Boat Ramps	A	A
Breakwaters or Jetties	S	S
Shoreline Protective Structures	S	S
Water Intake Lines	A	A
Floating Platforms and Docs	A	A

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The Draft EIR/EIS must include a Shore Zone Table for North Tahoe West. The North Tahoe East Table has been included by mistake- see page numbers above.

TABLE 2.04.C-1: LAND USE REGULATIONS-NORTH TAHOE WEST MIXED-USE SUBDISTRICTS						
	Town Center Subdistricts					
Use	MU-GW	MU-CCW	MU-CCE	MU-GE	MU-NC	Add'l Regs
Residential						
Single Family Dwelling	MUP (2)	MUP (3)	MUP (3)	A (2)	A (1)	
Multiple Family Dwellings	MUP (2)	MUP (3)	MUP (3)	MUP (2)	MUP (1)	
Multi-Person Dwellings	MUP	MUP		MUP		
Employee Housing	MUP	MUP	MUP	MUP	MUP	
Residential Care		MUP		MUP		
Tourist Accommodation						
Bed and Breakfast Facilities	A	A	MUP	A	A	
Hotels, Motels and Other Transient Dwelling Units	MUP (20 units or more, CUP)	MUP (20 units or more, CUP)	CUP	CUP	MUP (20 units or more, CUP)	
Timeshare (Hotel/Motel Design)	CUP	CUP	CUP	CUP	CUP	
Timeshare (Residential Design)	CUP	CUP	CUP	CUP	CUP	
Commercial						
Auto, Mobile Home and Vehicle Dealers		CUP	CUP			

Page 160 of Implementing Regulations 157-313

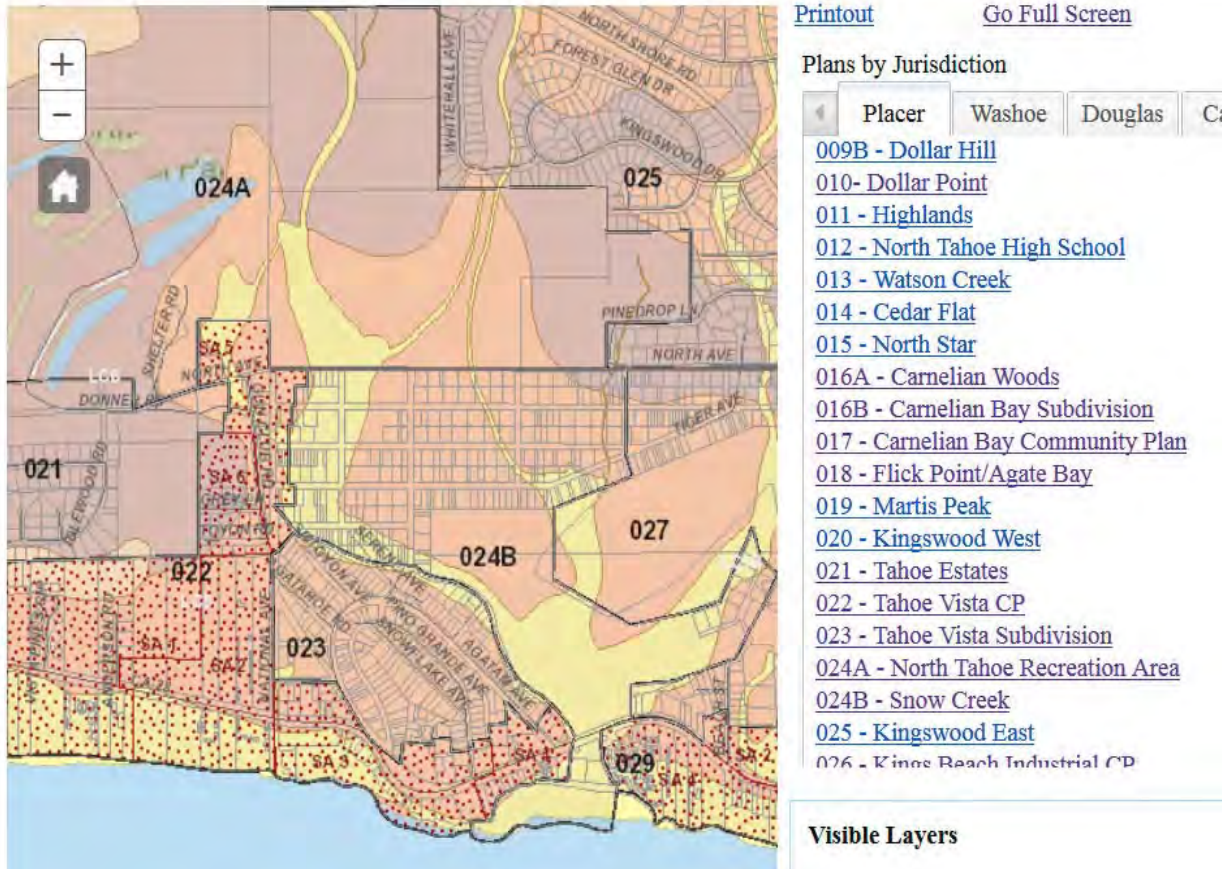
Correct the nomenclature at the top of the Table 2.04.C-1 Land Use Regulations – North Tahoe West Mixed-use Subdistricts. “Town Center” is incorrect. The nomenclature must be consistent in the Draft TBAP EIR/EIS Table above to allow the public/agencies to accurately comment by sub-area and to assist in determining if areas are performing and where additional environmental analysis and mitigations should occur.

Additional amendments are implemented for the lower intensity Village Centers throughout the Plan area. In these traditionally commercial nodes, the Plan promotes mixed land uses, environmental gain and high quality design. Village Centers include Tahoma, Homewood, Sunnyside, Lake Forest/Dollar Hill, Carnelian Bay and Tahoe Vista.

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AREA PLANS, COMMUNITY PLANS (CP), AND PLAN AREA STATEMENTS (PAS)



Provide Plan Area Statement maps for reference in the Draft TBAP EIR/EIS for each of the sub-areas to allow public/agencies to understand current baseline information enabling comments to be meaningful and correct and to allow the public/agencies to accurately comment by sub-area on how those areas are performing and where additional environmental analysis and mitigations should occur.

Include the Implementing Ordinances documents in the Draft TBAP EIR/EIS for further comment and analysis as the documentation is slated for approval by Placer County and TRPA.
<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/DraftAreaPlan2015/1-156%20Implementing%20Regulations%20DRAFT.pdf>

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCPUpdate/157-313%20Implementing%20Regulations%20DRAFT.pdf>

The Draft TBAP EIR/EIS must provide an alternative that includes the recommendations of the Plan Area Teams height and density requests for each sub-area and sub-district- The Implementing ordinances must also reflect those restrictions. Example below would need to be modified in the alternative to reflect Max Building Height requested by respective teams.

4. **Development Standards.** Table 2.03.FF-2 prescribes the development standards for the Woodvista Subdistrict.

TABLE 2.03.FF-2: DEVELOPMENT STANDARDS-WOODVISTA SUBDISTRICT	
Maximum Density	
<i>Residential</i>	Single Family Dwelling: 1 du/parcel
Maximum Building Height	TRPA Code of Ordinances, Chapter 37
Minimum Lot Size	10,000 sq ft
Minimum Lot Width	55 ft
Minimum Lot Area per Dwelling Unit	6,000 sq ft
Minimum Setbacks (measured from property line unless otherwise noted)	See also 17.54.130, 17.54.140, and 17.54.150
<i>Front</i>	20 ft (1)
<i>Side</i>	15 ft total; 5 ft min
<i>Rear</i>	10 ft
Maximum Community Noise Equivalent Level	50 CNEL
<i>Highway 267 Corridor</i>	55 CNEL
Notes: (1) Where the road right-of way is less than 50', add 25' to the front setback and measure from the center of traveled way.	

C. North Tahoe West Mixed-Use Subdistricts

Page 154 of Implementing Ordinances

Planning Statements. Planning statements for each Mixed-Use Subdistrict are as follows:

Mixed-Use Community Center (MU-CC). The Mixed-Use Community Center is made up of Mixed-Use Community Center East (MU-CCE) and Mixed-Use Community Center West (MU-CCW)

ii. Special Policies (6) Projects which provide substantial rehabilitation by re-modeling, upgrading, or other aesthetic improvements shall be eligible for incentives.

The TBAP Draft EIR/EIS must provide a list of incentives and criteria for projects eligible as defined in special policy 6. Define/provide criteria for substantial rehab by re-modeling.... Define/provide criteria for other aesthetic improvements.

Page 155 of Implementing Ordinances

b. Mixed-Use Gateway (MU-G). The Mixed-Use Gateway is made up of Mixed-Use Gateway East (MU-GE) and Mixed-Use Gateway West (MU-GW)

(5) Projects which provide substantial rehabilitation by re-modeling, upgrading, or other aesthetic improvements shall be eligible for incentives.

The TBAP Draft EIR/EIS must provide a list of incentives and criteria for projects eligible as defined in special policy 5. Define/provide criteria for substantial rehab by re-modeling....

Define/provide criteria for other aesthetic improvements.

aesthetic improvement

(6) The focus of redevelopment should be on the beach area

Special policy 6 should be revised to include for projects on the mountain-side not just focus on the beach-side as many of the tourist properties are in need of re-development.

TABLE 2.04.C-3: BUILDING PLACEMENT STANDARDS AND GUIDELINES—NORTH TAHOE WEST MIXED-USE SUBDISTRICTS				
Subdistrict				
	MU-G	MU-CC	MU-NC	#
Minimum Setbacks				
Street Frontage, Hwy 28 (from edge of pavement)	15 ft min, 20 ft max. First 4 ft should be a landscaped parkway followed by a minimum 6 ft sidewalk. This guideline may be waived by the Design Review Committee where topographical features preclude sidewalk construction and alternative pedestrian access exists (a)			1
Street Frontage, Other Streets (from edge of pavement)	10 ft min, 20 ft max. First 2 ft should be a landscaped snow easement followed by a 4 ft sidewalk (a)			2
Interior Side (from property line)	0 ft; 10 ft landscaped setback required adjacent to residential use			3
Rear (from property line)	20 ft		10 ft	4
Lake Tahoe	Per TRPA Code of Ordinances			5
Attached garage	2 ft from primary façade			6
Minimum Building Frontage at the Build-to Line (% of linear street frontage)	40% (b)	30% (b)	30% (b)	7
Corner Build Area	30 ft (c)	30 ft (c)	30 ft (c)	8
Maximum Projection into Front Setback	Awnings and overhangs to provide a covered walkway, public plaza, or outdoor eating area may project up to 50% of the required setback, but not into any public right-of-way.			9

The TBAP Draft EIR/EIS must provide actual code chapter(s) that the Lake Tahoe category is referring to

The North Tahoe West sub-area should not allow parking structures- it is not a Town Center. The tourist/lodging properties as well as commercial sites must provide adequate or shared parking for their projects. Remove i. from Implementing Ordinances for North Tahoe West sub-area.



Exceptions for Parking Garages: Multi-level garages are not required to meet the building transparency requirement of this subsection. Instead, they must be either located behind buildings or screened with a landscaped area at least 10 feet wide between the parking garage and public street.

TABLE 2.04.C-4: PARKING AND ACCESS STANDARDS AND GUIDELINES-NORTH TAHOE WEST MIXED USE SUBDISTRICTS

	Setback			#
	AW+G	AW+EC	AW+WC	
Minimum Setback from Edge of Traveled Way	20 ft (u)			1
Minimum Setback from Lake Tahoe	40 ft or per TRPA Code of Ordinances, whichever is greater			2
Setback from Buildings and Public Plaza	5 ft walkway and/or landscaping			3
Access Location	Side street of road whenever possible			4
Shared Access	See additional regulations (f)			
Curb Cuts	Minimized and in areas least likely to impede pedestrian circulation			

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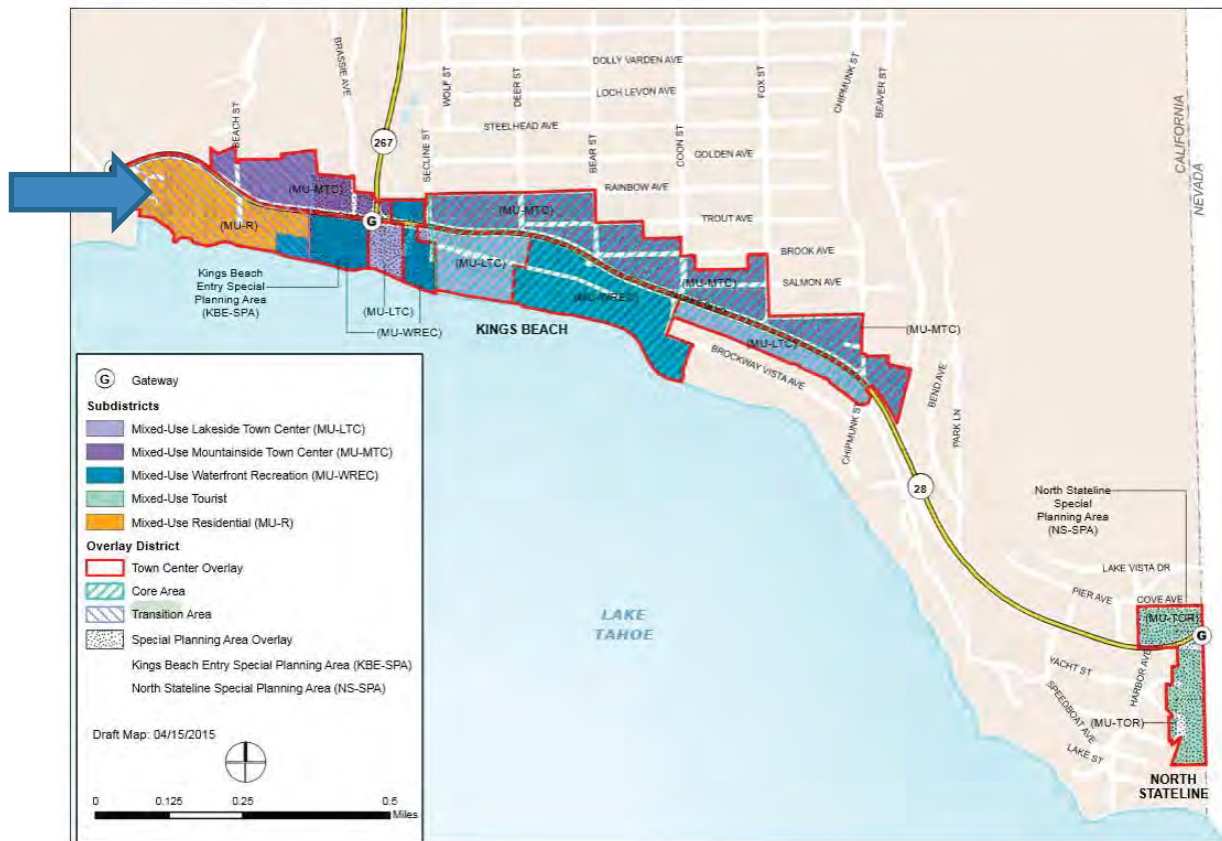
1. **Core Areas.**
 - a. **Building Height.** Maximum building height within Town Center Core areas is four stories and 56 feet, subject to the findings listed below.
 - i. Three- or four-story buildings in Town Centers shall meet findings listed in Section 37.7.16 of the TRPA Code of Ordinances; and
 - ii. Four-story buildings in Town Centers located between Lake Tahoe and State Highways 28 or 89 shall maintain 35 percent of the site as open view corridors to Lake Tahoe, or if existing development does not comply, increase the width of open view corridors by 10 percent or more.
2. **Transition Areas.**
 - a. **Building Height.** Maximum building height within Town Center Transition areas is three stories and 46 feet, subject to the findings listed below.
 - i. Three- or four-story buildings in Town Centers shall meet findings listed in Section 37.7.16 of the TRPA Code of Ordinances.
 - b. **Sidewalks.** Prior to or concurrent with development of projects utilizing Town Center standards, planned sidewalks or multi-use trails shall be installed along the project's Highway 89, Highway 28 and Highway 267 street frontages, as applicable, and extending off-site to the existing Town Center sidewalk/trail network. Any projects proposed without sidewalk or multi-use trail connections to Town Center Core areas shall be ineligible for Town Center Overlay District standards.
3. **Non-Contiguous Project Area.** Projects within the Town Center Overlay District may utilize a non-contiguous project area with TRPA approval. To utilize a non-contiguous project area, all project components shall be located on developed mixed-use land within the Town Center Overlay District and all applicable development standards shall apply.



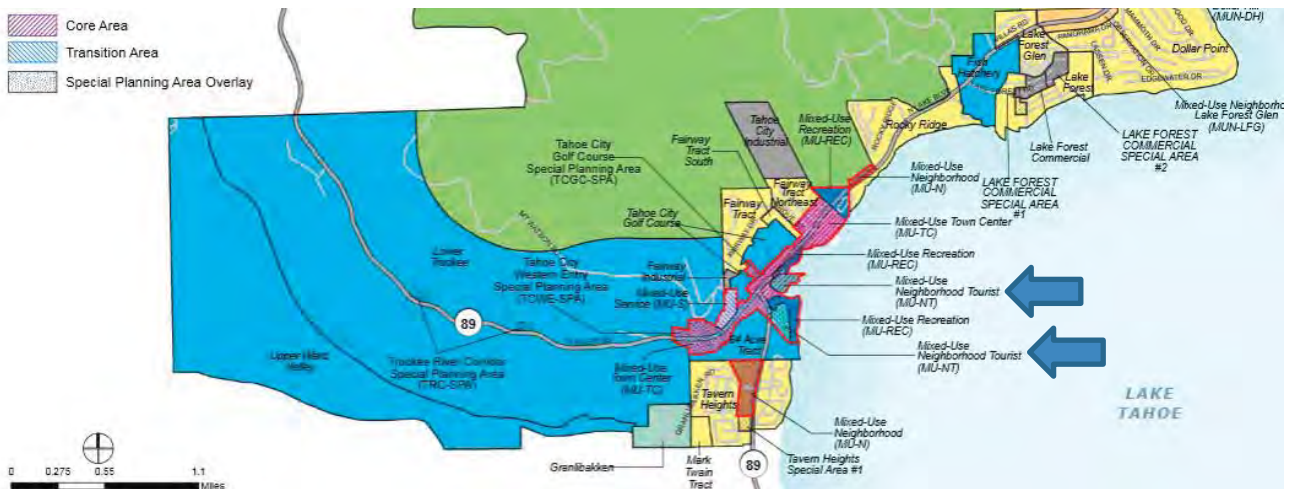
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Transition Areas that include shorezone properties must have restricted height below 46 feet in the Shorezone. Some areas are not Town Center Cores and should not be afforded greater height to insure the achievement of scenic thresholds and adhere to TRPA Shorezone Code findings. Transition areas differ inside and outside Town Centers. Implementing Ordinances must clearly provide different requirements for inside versus outside Town Centers.

NORTH TAHOE EAST: MIXED USE DISTRICTS



The transition area noted above is particularly confusing as the identified location is within the Tahoe Vista assessor boundary area but within the North Tahoe East Town Center sub-area. This location currently has condos/residential units that should not be allowed 46 feet in height if re-developed in the Shorezone .



The areas identified as transition areas Mixed-Use Neighborhood Tourist should not be allowed 46 feet in height if re-developed in the Shorezone.

The section below is very confusing on what policies from the old Community Plan and Plan Area Statements still apply to areas outside Town Centers. Clarity on what is applicable needs to be identified in Tables.

1.02 Authority

Pursuant to the TRPA Regional Plan and Code of Ordinances, Chapter 13, Area Plans, the County adopts the regulations in this document to implement the Area Plan in the portions of Placer County located within the Lake Tahoe Regional Planning area.

1.03 Applicability

The provisions of this document apply to all land uses, development, and projects occurring within the Placer County Tahoe Basin Area Plan area. The boundaries of the Area Plan include all land within Placer County under the jurisdiction of TRPA.

- A. All development within the Tahoe Region is required by federal and State law to comply with the Tahoe Regional Planning Compact (Public Law 96-551), Regional Plan, Code of Ordinances, and other provisions of TRPA.
- B. No Area Plan may limit TRPA's responsibility to enforce the Tahoe Regional Planning Compact, Regional Plan, TRPA Code of Ordinances, or other plan or regulation adopted by TRPA.
- C. All regulations of the TRPA Code of Ordinances shall remain in effect unless superseded by the provisions of this Area Plan. This document supersedes Chapter 36, Design Standards, of the TRPA Code of Ordinances in the Mixed Use Subdistricts. This document supersedes Chapter 34, Driveway and Parking Standards and Chapter 38, Signs, of the TRPA Code of Ordinances in the entire Plan area.
- D. In order to retain long-standing development standards for areas that were within Community Plans prior to adoption of the Area Plan and are not included in the Town Center

Placer County


Overlay District, provisions of the TRPA Code of Ordinances that apply to Community Plans and Community Plan Areas shall continue to apply.

1. Exceptions to this standard are as follows:
 - a. Chapter 11, Plan Area Statements and Plan Area Maps and Chapter 12, Community Plans, of the TRPA Code of Ordinances do not apply to adopted Area Plans; and
 - b. When standards for Town Centers address the same topic as a TRPA standard for Community Plans, the standards for Town Centers shall apply within the Town Center Overlay District.
2. Zoning subdistricts where TRPA Code of Ordinances Community Plan standards apply are as follows:
 - a. The former Tahoe City Community Plan includes all subdistricts within the Tahoe City Town Center plus the Fairway Service Subdistrict.
 - b. The former Kings Beach Community Plan includes all subdistricts within the Kings Beach Town Center.
 - c. The former North Stateline Community Plan includes the MU-TOR (Mixed Use – Tourist) Subdistrict within the North Stateline Town Center.
 - d. The former Tahoe Vista Community Plan includes the MU-CCW (Mixed Use – Community Center West), MU-CCE (Mixed Use – Community Center East), MU-GW (Mixed Use – Gateway West), and MU-GE (Mixed Use – Gateway East) Subdistricts.
 - e. The former Carnelian Bay Community Plan includes the MU-NC (Mixed Use – Neighborhood Commercial) Subdistrict.
 - f. The former Kings Beach Industrial Community Plan includes the Kings Beach Industrial Subdistrict.
- E. The Placer County Code applies to the area within a conforming Area Plan to the extent that a provision is not in conflict with the TRPA Code of Ordinances or this document.
- F. In case of conflicts between the provisions of this Area Plan and other TRPA Code of Ordinances provisions, the most restrictive provision applies. In all other cases, the Area Plan provisions apply.
- G. Upon adoption, the provisions of the Area Plan will supersede the six Community Plans and 51 Plan Area Statements that were previously adopted by Placer County and TRPA for the area. It will also replace two previously adopted Placer County General Plans.

I also herein incorporate all comments submitted by Tahoe Area Sierra Club and Friends of West Shore.


Comments on the Placer County Tahoe Basin Area Plan

From NOP documentation

The NOP lists nine  Community Plan while The Introduction section states the Area Plan Replaces six Community Plans. The Tahoe Basin Area Plan Draft EIR/EIS documentation must be consistent.

1.1.2 Relationship to Existing Plans

Once adopted, the proposed Area Plan would become part of the 2012 Regional Plan and the Placer County General Plan. The Area Plan would supersede and rescind the following community plans, general plans, PASs, and related planning documents adopted to implement the 1987 Regional Plan, including relevant sections of the Placer County Zoning Ordinance:

- 
- ▲ West Shore General Plan
 - ▲ Tahoe City Area General Plan
 - ▲ North Tahoe Area General Plan
 - ▲ Tahoe City Community Plan
 - ▲ Carnelian Bay Community Plan
 - ▲ Tahoe Vista Community Plan
 - ▲ Kings Beach Community Plan
 - ▲ Kings Beach Industrial Community Plan
 - ▲ California North Stateline Community Plan
 - ▲ 51 PASs adopted for Placer County
 - ▲ Placer County Standards & Guidelines for Signage, Parking & Design
 - ▲ Placer County Zoning Ordinance: Sections 17.02.050(D) and 17.56.202, and Appendices B, C, D, and F

Placer County TRPA
Placer County Tahoe Basin Area Plan

L

The adopted Placer County Tahoe Basin Area Plan becomes a part of the Lake Tahoe Regional Plan and the Placer County General Plan. **It replaces the six Community Plans**, the Placer County Standards & Guidelines for Signage, Parking and Design, and 57 Plan Area Statements that were previously adopted by Placer County and TRPA for the area. It also replaces two Placer County General Plans.

Page 8 (bottom of page) of Introduction

Because TRPA's standards are generally stricter and more detailed than other State and County requirements, this Area Plan utilizes the Regional Plan and Code as its foundation. Goals and Policies in the Regional Plan are supplemented with more specific goals and policies in the Area Plan.

The TRPA Code remains in place for most regulatory topics. Where the TRPA Code does not adequately address local considerations, supplemental and replacement standards are identified in this Area Plan and Code. **Topics not addressed in the TRPA Plans continue to be governed by the Placer County General Plan and Code.**

The Tahoe Basin Area Plan Draft EIR/EIS must list the Placer County General Plan and Code elements that will govern the Area Plan where TRPA does not address certain topics allowing the public/agencies to accurately comment by sub-area on how those sub-areas are performing and where additional environmental analysis and mitigations should occur. Provide a Table by topic with reference to Placer code that TRPA code does not govern.

This Area Plan must develop goals and plans that meet or exceed targets to achieve Regional Plan requirements and thresholds.

Outside the Town Centers a "Village Center" concept is embraced for the existing commercial areas. Mixed use zoning, new design standards, and parking amendments apply within Town and Village Centers. Additional opportunities for secondary residences are provided within ¼ mile of mixed use areas and transit routes.

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As commented in other sections a "Village Center" is outside Town Centers (example: Tahoe Vista) and is not targeted for environmental analysis within this Area Plan EIR/EIS and will be studied at a later time. Staff and consultants suggest the existing Community Plan standards and guidelines apply. The above statement is contradictory stating new design standards, and parking amendments apply and will be eligible for secondary residences.

The TBAP Draft EIR/EIS must include Tables for each sub-area and sub-district that is not a Town Center. The Tables must disclose new standards and policies that will apply allowing the public/agencies to accurately comment by sub-area on how those sub-areas are performing and where additional environmental analysis and mitigations should occur.

ORGANIZATION OF THE AREA PLAN

This Area Plan is comprised of eight sections and implementing regulations. Reference documents that are not part of this Area Plan are provided as Appendixes.

Part 1 – Introduction: An overview of the regulatory framework, planning process, and Area Plan content.

Part 2 – Conservation Plan: Current environmental conditions and plan to achieve and maintain environmental Threshold standards.

Part 3 – Socioeconomic Plan: Socioeconomic conditions and plan for improvement.

Part 4 – Land Use Plan: Existing and planned land uses and development.

Part 5 – Transportation Plan: Existing and planned multi-modal transportation facilities and services.

Part 6 – Recreation Plan: Existing and planned recreation facilities and services.

Part 7 – Public Services and Facilities Plan: Existing and planned public services and facilities.

Part 8 – Implementation Plan: Implementation Projects and environmental performance targets.

Area Plan Implementing Regulations: Zoning districts, land use regulations, development standards and design guidelines.

Appendixes (Reference Documents – not a part of the Area Plan):

- A. Memorandum of Understanding for the Placer County Tahoe Basin Area Plan (placeholder – MOU to be prepared).
- B. Kings Beach Vision Plan, September 2013.
- C. Tahoe City Visioning Options Report, September 2013.
- D. Existing Conditions Report, September 2013.
- E. Study on Economic Development Incentives for Town Centers, February 2015.
- F. Summary of Community Plan Performance Measures, March 2015.

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The Draft TBAP EIR/EIS Conservation Section Part 2 must list in title of section: Scenic Resources, to allow public/agencies to accurately comment by sub-area scenic impacts and to determine where additional environmental analysis and mitigations should occur

The Draft TBAP EIR/EIS must include Area Plan Implementing Regulations and all Appendix documentation A-F) listed above for environmental analysis as they are reference documents that inform the Tahoe Basin Area Plan.

7.4 Stormwater

Stormwater management is high priority at Lake Tahoe and is a central component of the Regional Plan and the Lake Tahoe TMDL. These programs and facilities are detailed in the Conservation Plan water quality section.

Stormwater facilities are owned and operated by agencies and landowners in the Plan area. Consideration should be given to establishing one or more stormwater utility districts to more efficiently plan, construct and maintain stormwater facilities.

The Draft Tahoe Basin Area Plan EIR/EIS must include a policy that makes it mandatory for any tourist , commercial, industrial, mixed-use, public service or recreation property being built or redeveloped to complete all BMP's in Phase 1 if project is to be phased to help achieve threshold gain sooner than later.

Chapter 2: Conservation Existing Conditions Report

Best Management Practices

The Best Management Practices (BMP) Stormwater Management Program, also known as EIP project #16, is one of the largest EIP programs both in scope and cost. Stormwater pollution affecting Lake Tahoe is directly correlated with the extent of urban development within the Tahoe Region.¹³ Stormwater BMPs are control measures taken to mitigate the quantity and quality of runoff caused by increased impervious surfaces from urban development. In general, BMPs are designed to reduce stormwater volume, peak flows, and/or nonpoint source pollution through evapotranspiration, infiltration, detention, and filtration.¹⁴

In 1992, TRPA codified the BMP retrofit program, which requires that all property owners in the Tahoe Region install erosion control and stormwater infiltration measures on developed parcels. BMPs must be designed to stabilize soil and infiltrate the volume of a 20-year, 1-hour storm onsite. As of December 2011, 14,714 of 43,470 parcels in the Tahoe Region had received a BMP certificate, a compliance rate of 34 percent.

TRPA provided data on parcels that have received BMP certificates since 1992 within the Plan Area. As shown in Table 2.3-4 below, BMP compliance for all developed parcels in the Plan Area is 29 percent, which is slightly lower than BMP compliance overall within the Region. Approximately 31 percent of single-family parcels, 39 percent of multi-family parcels and 20 percent of commercial parcels have received BMP certificates. Figure 2-4 maps the location of developed parcels with BMP certificates.

Table 2.3-4: BMP Compliance in the Plan Area

Land Use	Total Estimated Parcels	BMP Certificates	BMP Compliance
Single Family Residential	9,983	3,078	31%
Multifamily Residential	635	247	39%
Commercial	266	52	20%
Tourist Accommodations	73	14	19%
Industrial	217	10	5%
Public Services	129	29	22%
Recreation	439	20	5%
Total Parcels¹	11,742	3,450	29%

¹ Does not include conservation/backcountry or vacant parcels.

Source: TRPA, 2013.

¹³ Appendix IE-3, Stormwater Management/BMP Retrofit Program Overview, TRPA (2012).

¹⁴ Municipal Stormwater Management, Thomas Debo (2003).

Provide a Table in the Draft TBAP EIR/EIS broken down by sub-area for BMP Compliance. Break-down the Table above by sub-area to allow the public/agencies to accurately comment by sub-area on how those areas are performing and where additional environmental analysis and mitigations should occur.

Existing Study Area Conditions



New policies in the TRPA Regional Plan may enable property owners to participate in area-wide water quality management solutions rather than implementing BMPs on an individual parcel basis.

Area-Wide Water Quality Treatment

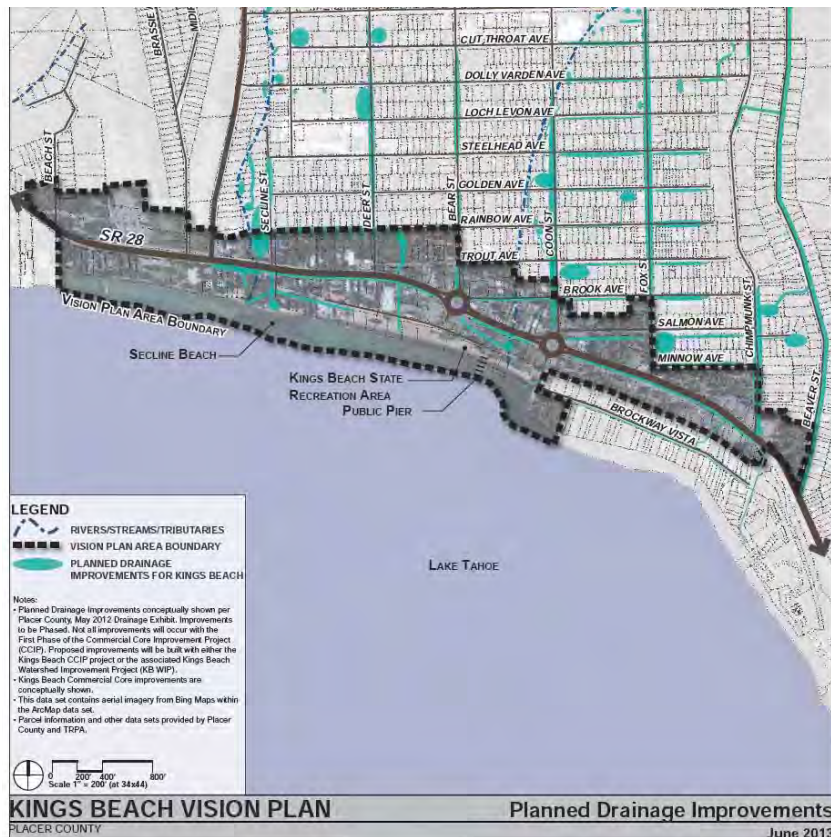
One of the major obstacles inhibiting redevelopment of existing properties within Kings Beach are the parcel specific water quality discharge and treatment requirements. The TRPA Regional Plan requires that parcels meet specific standards for water runoff from impervious surfaces. To achieve the standards, properties are required to install Best Management Practices (BMPs) to control erosion and manage surface runoff. Analysis provided by TRPA indicates that within the Kings Beach Town Center only 7% and 9% of the tourist and commercial properties, respectively, have BMP Certificates.

The County's ongoing Kings Beach Water Quality and SEZ Improvement Project phases present a significant opportunity for properties within area/community plans to establish area-wide water quality treatment and funding mechanisms in lieu of certain site-specific BMPs (assuming capital funding for the County's project and future phases are secured). Following TRPA approval of the County's area/community plan, property owners may find that connecting to the County owned system provides a feasible alternative to implementing individual parcel BMPs.

Page 6 of 6 Kings Beach Vision 2013

Environmental Gains

Due to its proximity to the lake, developed stream environment zones (SEZs), and deteriorating infrastructure, Kings Beach contributes some of the highest levels of fine sediment loads to Lake Tahoe. Emphasis should be placed on environmental improvements that upgrade the natural and built environment in support of threshold attainment.



Kings Beach Vision 2013

The Draft TBAP EIR/EIS must provide detailed criteria of in-lieu and proposed area-wide BMP programs. Provide information about secured capital funding and a priority list for that funding for proposed area-wide water quality projects. Provide detailed environmental analysis based on the priority list to get the greatest environmental improvements. Provide detailed criteria for adjoining to County systems versus individual BMPs and provide environmental analysis disclosing where greater benefits are achieved when joining to the area-wide system. Develop a policy for enforcement of BMPs to achieve greater environmental benefits.

Page 24 of 63 Existing Conditions Report: Fundamental Issues & Challenges

Research and analysis from previous planning studies, conversations with the local land agencies, and community members during the charrette revealed a consistent summary of the fundamental challenges facing Kings Beach:

- There are approximately 42.3 acres of stream environment zones (SEZ) within the Kings Beach Vision Plan (source: Kings Beach Community Plan, 1996). These lands have limited development potential but they may serve as part of an environmental redevelopment plan aimed at concentrating development in more appropriate areas of the community.

The Draft TBAP EIR/EIS must provide a diagram by sub-area showing the approximately 42 acres of SEZ to allow the public/agencies to accurately comment by sub-area on how those areas are performing and where additional environmental analysis and mitigations should occur.

Page 29 of 63 Existing Conditions report

Environmental Gains Principles

Environmental Gains principles highlight opportunities to achieve environmental gains while meeting community goals.

1. Build upon the Commercial Core's environmental improvements to reduce impacts to lake clarity. Relocate inappropriate uses from sensitive landscapes and consider dual uses of water quality facilities to achieve environmental and community needs.
 - Identify inappropriate uses which are located in stream environment zones or other sensitive lands and determine appropriate strategies for relocation to more appropriate sites.
 - Identify opportunities to improve the connection to recreation sites and provide beach access through the relocation of uses on sensitive lands.
 - Consider the dual use of sediment basins to achieve environmental goals and provide community resources such as park facilities.
2. Develop verifiable environmental improvements as part of area-wide solutions.
 - Identify opportunities for property owners to connect to planned and implemented area-wide BMP projects to reduce existing sediment loading to Lake Tahoe and other environmental impacts.
 - Coordinate area-wide BMPs to technical realities.
3. Utilize reinvestment to implement environmental improvements, including water quality and scenic threshold attainment.
 - Consider reinvestment opportunities to relocate inappropriate uses, provide lake access, and achieve environmental gains while providing community resources.
 - Provide a package of environmental improvements that can be included with reinvestment.



Environmental improvements should be continued to help minimize negative community impacts to water clarity.



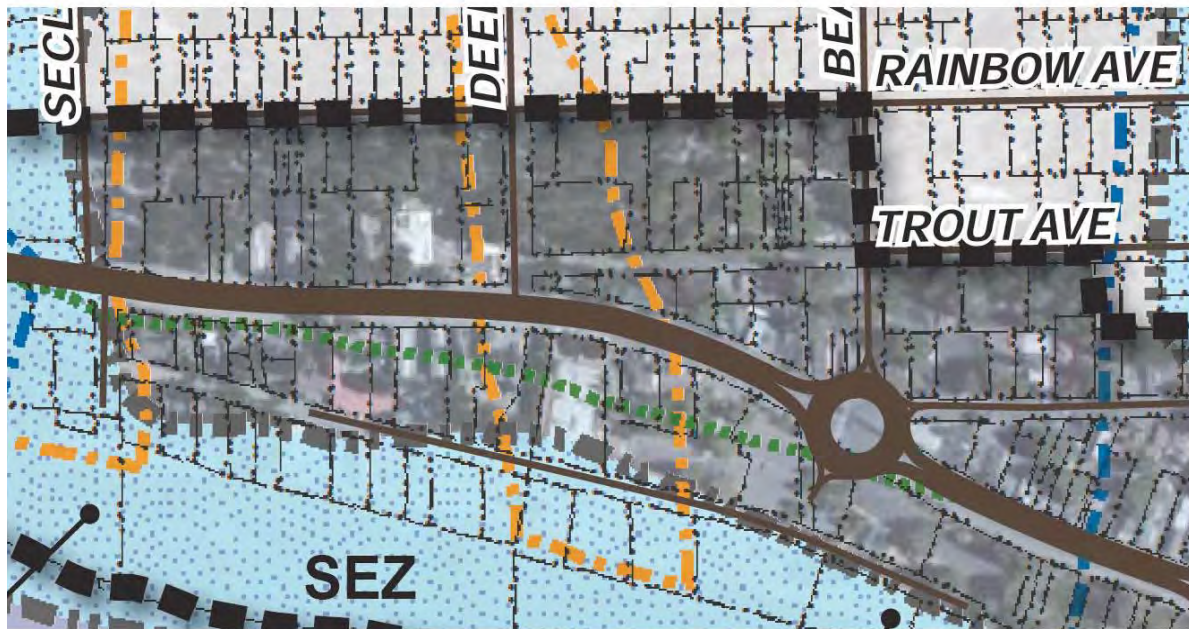
The Draft TBAP EIR/EIS must provide detailed criteria for identified opportunities for property owners to adjoin or support area-wide BMP projects. Develop policies and implement programs that realize the environmental benefits envisioned. Provide detailed criteria and develop policies for TMDL linkage requirements and implementation.

Page 54 of 63 Existing Conditions Report A number of existing lodging units are located in a stream environment zone (SEZ) along the lakefront. While lake frontage is highly desirable for accommodation units, environmental improvements could be achieved by redeveloping the property to relocate units out of sensitive lands while maintaining prime lake views and direct beach access. Additional community benefits could be achieved if the redevelopment also included public amenities such as access to beach areas.

The Draft TBAP EIR/EIS must provide a diagram by sub-area showing the existing lodging units located in SEZ (identify lodging establishment by name) to allow the public/agencies to accurately comment by sub-area on how those areas are performing and where additional

environmental analysis and mitigations should occur. As well as identifying the potential for new open space in the shorezone if the lodging units were to be re-located to a more suitable, higher land capability site.

Page 55 of 63 of Existing Conditions Report



Existing lake side accommodations are partially located in a stream environment zone. Relocation of units out of sensitive areas provides opportunities for environmental and community benefits.

Sample diagram of SEZ location

From the Introduction section

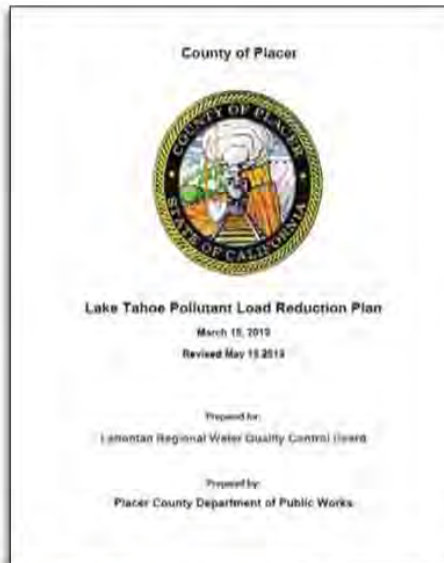
LAKE TAHOE TMDL (TOTAL MAXIMUM DAILY LOAD)

The Lake Tahoe TMDL program was developed under the Federal Clean Water Act and approved in 2011. The TMDL is intended to complement the Regional Plan and was prepared in coordination with TRPA.

The TMDL identifies Lake Tahoe's pollutants of concern (fine sediment, phosphorus and nitrogen) and the primary sources of those pollutants (urban uplands and atmospheric deposition).

Pollutant load reduction targets are established in the TMDL to attain the Lake Tahoe transparency standard over a 65-year implementation period. The TMDL requires that each jurisdiction holding a National Pollutant Discharge Elimination System (NPDES) permit - including Placer County - identify and implement measures to achieve the required pollutant load reductions.

Placer County's current Pollutant Load Reduction Plan (PLRP) was approved in 2013. Load reduction targets are being achieved with Water Quality Improvement Projects in high priority catchments, pollutant control management measures in road maintenance operations, and the completion of private parcel Best Management Practices (BMPs) for larger projects and redevelopment activities.



*County of Placer Pollutant Load Reduction Plan,
May 15, 2013*

The TBAP Draft EIR/EIS must provide details (actual project implementation/analysis/adaptive management and trend toward positive results) and disclose the achievement of load reduction targets. Provide (plan/table) information of what is expected to be achieved on an annual basis. If multi-year project, show same info for 4 years to be aligned with Regional Plan/Threshold Report cycle of review to determine next steps toward the 65 year implementation period. This Area Plan must develop goals and plans that meet or exceed targets to achieve Regional Plan requirements and thresholds.

Page 26 of 42 Conservation Part 2 SCENIC RESOURCE POLICIES

SR-P-1 Continue to participate in the Lake Tahoe Environmental Improvement Program (EIP) and coordinate with other agencies to identify and secure funding for projects that improve scenic quality.

The Draft Tahoe Basin Area Plan EIR/EIS must provide a list of proposed EIP projects to be supported by new and redeveloped projects that will be required to provide mitigation funds.

SR-P-2 Accelerate scenic resource improvement by implementing incentives for redevelopment within Town Centers and the transfer of development from outlying areas to Town Centers in accordance with the Regional Plan. *The Draft TBAP EIR/EIS must include proposed incentives and criteria to allow the public/agencies to accurately comment by sub-area on how those areas are performing and where additional environmental analysis and mitigations should occur.*

SR-P-3 Support undergrounding of overhead utility lines on a project-by-project basis, as well as through established Underground Districts. *The Draft TBAP EIR/EIS must include a diagram of proposed underground districts and should require completion of undergrounding for those sites that have already been granted facade loans.*

From Implementing Ordinances page 5 & 7 of 159 for reference in Imp Ord doc #2: All projects within the TRPA scenic corridor shall be responsible for removing, relocating, or screening overhead utilities as a condition of project approval. The decision making body may waive this requirement if the project is part of an underground program or the undergrounding has been determined by TRPA not to be necessary to meet TRPA scenic targets. The TBAP Draft EIR/EIS must provide criteria for "determined by TRPA no to be necessary to meet scenic targets."

SR-P-4 Protect and enhance existing scenic views and vistas. *The Draft TBAP EIR/EIS must include criteria and details for protection and enhancement of existing scenic views and vistas. Provide a diagram of location of views and vistas to be protected.*

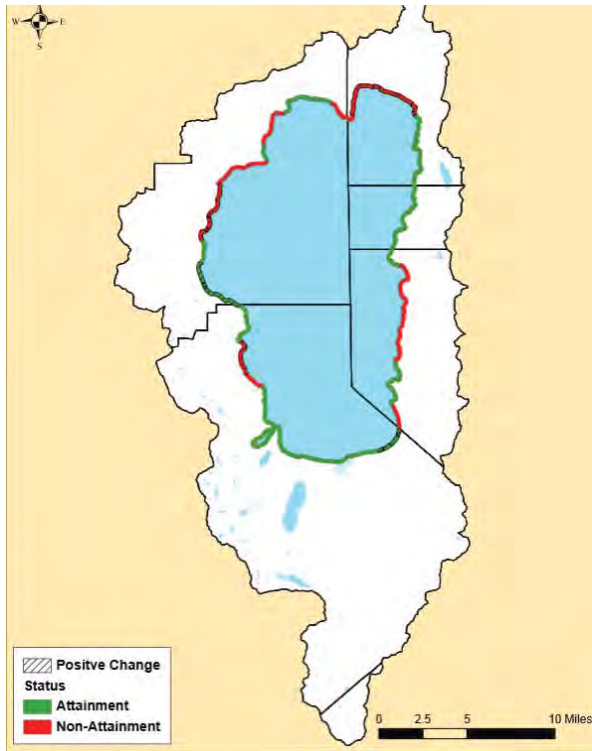
SR-P-5 Implement site and building design standards to protect and enhance scenic views from Town Centers and nearby areas. *The Draft TBAP EIR/EIS must include criteria and details for protection and enhancement of existing scenic views.*

SR-P-6 Manage development located between designated scenic corridors and Lake Tahoe to maintain and improve views of Lake Tahoe from the corridors. *The Draft TBAP EIR/EIS must include criteria and details for "management of development" and what will be done to "maintain and improve views of Lake Tahoe from the corridors."*

SR-P-7 Prioritize scenic improvement efforts at the gateways to Lake Tahoe in Tahoe City and Kings Beach. *The Draft TBAP EIR/EIS must include criteria and details for "improvement efforts at the gateways."*

SR-P-8 All TRPA policies, ordinances and programs related to Scenic Quality will remain in effect. Scenic Quality improvement projects and policies are identified in the Implementation Plan.

The TBAP Draft EIR/EIS must provide actual height not stories of the three proposed buildings for the Tahoe City Lodge and Kings Beach Design Concept buildings to insure the public/agencies can accurately determine scenic visual assessments and other scenic threshold issues are addressed in the areas of travel route attainment, recreation scenic disruption with the TC golf course, residential district impacts on Fairway Drive, residential district impacts in Kings Beach Grid, etc.



The Draft TBAP EIR/EIS must include approximate heights of trees to be retained on the Tahoe City Lodge project site for comparison to proposed building heights.

The most up to date renderings must be included in the Draft TBAP EIR/EIS to allow the public/agencies to accurately comment. A comparison Table of existing hotels should also be included for reference i.e. how many acres and how many units in the Tahoe City Inn, Peppertree, Ferrari's Crown Motel and height of those properties.

Include an alternative for the Tahoe City Lodge project that would instead of a Lodge, be an entirely commercial shopping center as stated by applicant at the July 29, 2015 public meeting to compare environmental impacts of a non-lodge project.

The Draft Tahoe Basin Area Plan EIR/EIS must analyze the impacts of the proposed changes in the Town Centers on local population, housing, and employment characteristics. Describe the demographics of the region and those areas directly adjacent to the Tahoe basin: Provide detailed information of the current /proposed populations of Squaw Valley, Northstar and Martis Valley West Specific Plan to date. Analyze for cumulative effects on the Tahoe Basin.

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3.1 Population

Like many areas in the Lake Tahoe Region, the Plan area has sustained a decline in its permanent population base for many years. The population within the Placer Tahoe Basin Area Plan was 9,716 as of April 2010 according to the 2010 U.S. Census, a 20 percent decline from the 2000 population of 12,158 (Table 3.1-A). The loss of population is in large part due to a declining regional economy and a dramatic increase in residential home prices starting in 2001.

Table 3.1-A: Population Trends in the Area Plan

Community	2000	2010	% Change
	Population	Population	
Dollar Point	1,539	1,215	-21.1%
Kings Beach	4,037	3,796	-6.0%
Sunnyside	1,761	1,557	-11.6%
Tahoe Vista	1,668	1,433	-14.1
Carnelian Bay	n/a	524	n/a
Tahoma	n/a	1,191	n/a
Remainder	3,153	n/a	n/a
Total	12,158	9,716	-20.1%

Source: 2000/2010 U.S. Census

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Table 3.6-1: Population Change Between 2000 and 2010

Community	2000	2010	Percent Change
Carnelian Bay	1,928	1,170	-39%
Dollar Point	1,539	1,215	-21%
Tahoe City	3,997	3,161	-21%
Tahoma	1,282	1,037	-19%
Homewood	840	744	-11%
Kings Beach	4,802	4,414	-8%
Tahoe Vista	669	788	18%
Total	15,057	12,529	-17%

Source: Placer County, TBCP Background Report dated April 23, 2013.

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More than fifty percent of North Lake Tahoe residences are used on a seasonal, recreational, or occasional basis. The North Lake Tahoe area is characterized by a high proportion of absentee property owners. Table 3.2-B shows the percentage of absentee ownership among various communities in the North Lake Tahoe area. Kings Beach and Tahoe Vista show the lowest rates of absentee ownership at 34 percent and 50.8 percent, respectively. Dollar Point, Carnelian Bay, and Tahoma have absentee ownership rates of over 60 percent.

Table 3.2-A: Housing Units and Occupancy

<i>Community</i>	<i>Total Units</i>	<i>Occupied</i>	<i>Vacant</i>	<i>Owner-Occupied</i>	<i>Renter-Occupied</i>
Carnelian Bay	947	256	691	171	85
Dollar Point	1,822	571	1,251	363	208
Kings Beach	2,372	1,362	1,010	552	810
Sunnyside/Tahoe City	2,119	744	1,375	402	342
Tahoe Vista	1,446	628	818	398	230
Tahoma	2,058	553	1,505	359	194
Total	10,764	4,114	5,410	2,245	1,869

Source: 2010 U.S. Census

Table 3.2-B: Seasonal Housing Units

<i>Community</i>	<i>Vacant Units Used for Seasonal Use</i>	<i>Percent of All Housing Units</i>
Carnelian Bay	654	69.1%
Dollar Point	1178	64.7%
Kings Beach	807	34.0%
Sunnyside/Tahoe City	1239	58.5%
Tahoe Vista	735	50.8%
Tahoma	1428	69.4%
Total	6041	56.1

Source: 2010 U.S. Census

The Draft TBAP EIR/EIS must provide accurate information of populations by community for each sub-area (community) for local as well as tourist redevelopment needs i.e. additional commercial uses, public services, etc.

Page 133 of the Existing Conditions Report provides population data and narrative (below). Page 4 of the Socio Economic section provides population data. Basis for environmental analysis are concluded on which data set: The Existing Conditions Report or the Part 3 Socio-Economics? Provide details and related analysis in the Draft TBAP EIR/EIS. The data provided must be consistently reported to insure accurate environmental analysis and assessments for mitigations .

3.6 Opportunity Sites and Market Demand

DEMOGRAPHIC AND EMPLOYMENT PROJECTIONS

Population Growth

Between 2000 and 2010 the entire permanent population of the Tahoe Region decreased by about 12 percent. In 2000 the permanent population of the Region was approximately 62,800. By 2010 the population had decreased to 55,600, slightly above the Region's 1990 population of 52,600. According to the US Census there were 19,535 persons on the north shore and 36,072 persons on the south shore in 2010.

Lake Tahoe experiences huge swings in population throughout the year. Generally, the population swells significantly during the popular summer and winter tourist months, when millions visit the lake, returning to normal levels during the fall and spring, more reflective of the permanent population. Table 3.6-1 shows the permanent population of the Plan Area by community. Similar to other communities in the Tahoe Region, the Plan Area has sustained a decline in permanent population since 2000. In 2000, the total population of the Plan Area was 15,057. By 2010 the population had decreased to 12,529, a decrease of 17 percent in permanent population. Carnelian Bay experienced the greatest decline (39 percent) followed by Dollar Point (21 percent). Tahoe Vista was the only community to grow in population, which likely reflects a growing workforce population along the north shore as many permanent residents are priced out of more expensive housing located along the west shore. The average sales price of a single family home on the west shore is 50 percent higher than that on the north shore.¹²

Page 133 of Existing Conditions Report

Employment Growth

Similarly to the declining population trend described above, the Tahoe Region in recent years has experienced a substantial loss in the number of local jobs. Between 2001 and 2009, employment in Tahoe fluctuated from a high of approximately 28,000 jobs in 2001 to a low of 22,300 in 2009, a decline of more than 20 percent.

The north shore leisure employment base is heavily impact by weather, quality and quantity of access to natural and man-made resources, and availability of disposable income to visitors. According to a study prepared for the North Lake Tahoe Resort Association (NLTRA), the primary and secondary impacts of tourism produce 65 percent of north shore employment earnings and 71 percent of its jobs. When compared to other similar resort destinations, the north Lake Tahoe area has the highest percentage of earnings coming from the leisure industry. This indicates that the local economy is highly susceptible to travel and tourism trends.¹³

In 2010, approximately 87 percent of jobs on the north shore were filled by workers from outside the Region and it is estimated that approximately 49 percent of workers throughout the Tahoe Region commute 50 miles or more to work.¹⁴ Table 3.6-2 below shows employment by sector for workers whose jobs are located in the Plan Area. Interestingly, between 2002 and 2011 there was an 8 percent increase in employment in the Plan Area. Sectors seeing the most job growth were primarily government jobs (public administration, educational services and utilities), in addition to real estate rental and leasing, and other services. Sectors seeing the most job losses included the construction sector and accommodation and food service.

Page 134 of Existing Conditions Report

Page 9 of 9 of Socio-Economics Part 3

3.5 Socio-Economic Policies

SE -P-1

The planning and permitting process should be streamlined to the maximum feasible extent.

SE-P-2

Consistent with the Regional Plan, Town Centers are the preferred locations for economic development incentives and projects.

SE-P-3

Opportunities for economic development outside Town Centers should be pursued in a manner consistent with the Regional Plan.

The Draft TBAP EIR/EIS should add to this policy that sub-areas outside Town Centers will be addressed in more detail as an amendment to this Area Plan documentation to inform the public/agencies that environmental issues will be addressed in the future not in this Area plan.

SE-P-4

Whenever feasible, Placer County should provide assistance to property owners seeking to complete projects on priority redevelopment sites through public-private partnerships and other forms of assistance.

The Draft TBAP EIR/EIS must provide criteria/define/identify on a diagram "priority redevelopment sites" to allow the public/agencies the opportunity to provide comment on identified areas. Provide proposed funding levels that have been allocated or expected to be obtained for the public/private partnerships. As well, provide the criteria/list of other forms of assistance" for comment by public/agencies.

SE-P-5

Placer County supports efforts to promote environmental redevelopment in mixed use areas within and outside Town Centers, including the Village Centers identified in this Area Plan.

The Draft TBAP EIR/EIS must provide criteria/define/identify on a diagram changes proposed for sub-areas outside Town Centers as the Area Plan consistently reports no changes to those areas?

SE -P-6

Continued efforts to address the existing job-housing imbalance and provide additional housing at affordable price levels should be pursued.

The Draft TBAP EIR/EIS must identify proposed locations and provide environmental analysis for those areas targeted for additional affordable housing. Provide a diagram for proposed locations and analyze fair-share in each Town center as well as other areas..

The Draft TBAP EIR/EIS must include a cumulative impact analysis and provide a detailed table of the current and newly proposed projects to insure environmental impacts of VMT, Noise, Water Quality, Air Quality, etc. are extensively analyzed and do not hinder threshold gain.

Projects that must be included but not limited to: Martis Valley West Specific Plan, Brockway Campground, Squaw Valley Expansion, Northstar Master Plan, Martis Camp Beach Shack, Ritz Carlton Beach Pavilion, Tahoe City Lodge Project, Homewood Mountain Village, Boulder Bay, Kings Beach Design Concept, Speedboat Beach Master Plan, Tonopalo II, Sandy Beach Timeshare project, etc.

The Draft Tahoe Basin EIR/EIS must address climate change impacts and specifically analyze how the Area Plan would comply with AB32 and the Global Warming Solutions Act of 2006 as well as SB375.

TRPA's Regional Plan Goals and Policies and Regional Transportation Plan, as well as the General Plan, set standards for vehicle "level of service" (LOS). LOS is a qualitative measure that describes the operating performance of transportation facilities. For roadways, LOS is an indicator of traffic flow from the perspective of motorists based on factors such as speed, travel time, delay, freedom to maneuver, volume, and capacity. It is defined on a scale from LOS A, the least congested operating conditions, to LOS F, the most congested operating conditions. The TRPA Regional Plan require that peak period traffic flow not exceed LOS D for major roadways (arterials and collector routes), and signalized intersections shall be at LOS D. LOS E may be acceptable during peak periods, not to exceed 4 hours per day.

Provide detailed LOS information and analysis of SR 28, 89, 267. The most recent information provided as noted in Table 5.2 is 2011 and is outdated (Source: Fehr and Peers, 2011; EDAW, 2005, 2008; LSC, 2006).

EXISTING TRAFFIC CONDITIONS

"Level of Service" (LOS) is a measure of the quality of operation of roadway elements, ranging from LOS A (free-flow conditions, with minimal delay) to LOS F (stop-and-go conditions, with extensive delays). Placer County currently defines its LOS standard as "D" for locations within one-half mile of a state highway, and "C" for other locations in the Plan area. The TRPA standard is to achieve LOS D or better at signalized intersections, with up to four hours per day at LOS E allowed. The TRPA vehicle LOS standards may be exceeded when provisions for multi-modal amenities and/or services are adequate to provide mobility for users. In general, Caltrans tries to maintain LOS D or better, although exceptions are made in specific cases.

Table 5.2 presents the existing LOS at key intersections. The LOS F conditions at SR 28/Grove Street reflect the long delays for movements (particularly left turns) onto the state highway at stop-sign-controlled intersections along the major highways. The other (signalized) intersections attain LOS standards.

Table 5.2: Existing Level of Service at Key Intersections

	Winter	Summer
SR 89 / SR 28 (Tahoe City Wye)	C	D
SR 28 / Grove Street	F	F
SR 28 / National Avenue	A	A
SR 28 / SR 267	D	C
SR 28 / Coon Street	A	B

Note: Based on average delay of all approaches for signalized intersections, and delay on worst approach at unsignalized intersections.

Source: Fehr and Peers, 2011; EDAW, 2005, 2008; LSC, 2006.

Not reflected in the intersection LOS is the congestion created along roadways away from the key intersections. In particular, drivers on SR 89 northbound and SR 28 in both directions through the Tahoe City core area experience substantial (20 minute or more) delays due to a combination of factors including pedestrian crossings, parking maneuvers,

The Draft TBAP must provide information and adequate mitigation fee structures that should require local nexus of those fees for new and re-developed properties where LOS levels exceed prescribed standards. Provide extensive environmental analysis for air quality, VMT, etc. as related to non-attainment of LOS standards as well as mitigation measures.

Develop a policy in the Draft Tahoe Basin Area Plan for fixed route bus stops within the plan area. Some have benches, while some of the stops also provide shelter for bus users. Provide a diagram for proposed shelters along the route as ridership is affected by weather. Coordinate with the Tahoe Transportation District on installing additional bus shelters along SR 28 and SR 89 as funding becomes available.

TRPA is requiring each local jurisdiction to develop a Greenhouse Gas (GHG) reduction strategy, using the Lake Tahoe Sustainability Action Plan as a guide in order to attain a 15 percent reduction below the existing emissions inventory for Area Plans. According to the IS/IEC, accounting for the GHG emissions reduction associated with the removal of existing lodging units for operation would result in assisting that reduction. The Tahoe Basin Area Plan is proposing up to 400 new TAUs. Provide detailed criteria and disclose in the Draft Tahoe Basin Area Plan how Placer will achieve GHG reductions with the addition of any new TAU's above and beyond what exists on the books today in Placer County.

Page 6 of 18 of Transportation Plan Part 5.

To implement the policies of the Regional Transportation Plan, Placer County, TRPA, the Tahoe Metropolitan Planning Organization and TTD shall develop and carry out measures to revitalize the Fanny Bridge and Tahoe City River District into a primarily pedestrian and bicycle zone. These measures shall be developed through active planning processes and adopted into the appropriate plans, including the Placer County Area Plan, the Tahoe City Mobility Plan, and the Corridor plan for the area. In particular, Placer County and TRPA will fully implement feasible biking, walking and transit objectives of the Mobility and Area plans consistent with RTP policies on complete streets in consultation with stakeholders.

Feasibility shall take into account funding and State and local legal requirements.

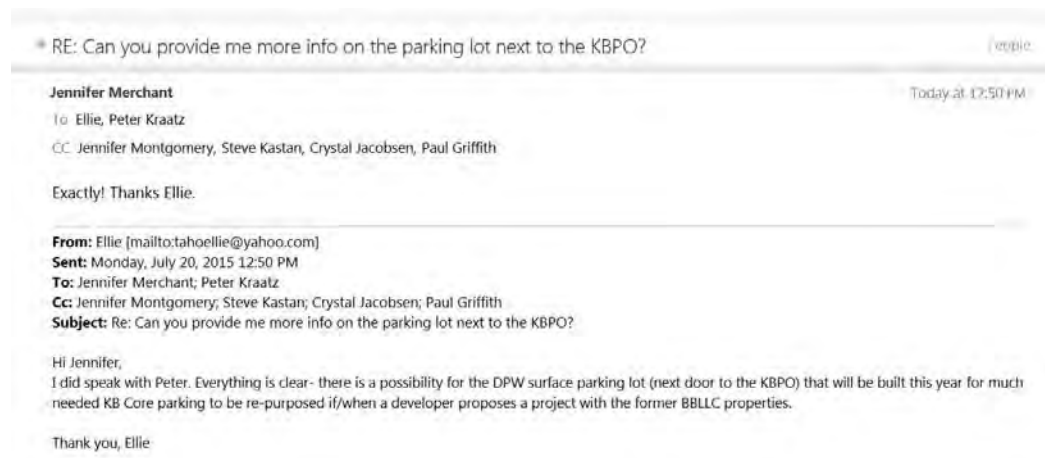
[Note to public: Specific policies to implement the above general direction for inclusion in this Area Plan will be developed.]

The Draft TBAP transportation policies and environmental analysis must factor in seasonal weather changes as well as tourist population fluctuations . The financial feasibility/economics of transportation must be studied for the down-sized tourist/workforce shoulder-season populations. Provide documentation citing where in the TMPO Mobility 2035 Regional Transportation Plan that the TBAP supports/adheres to the RTP policies. The Draft TBAP EIR/EIS must include specific policies to allow public/agencies to comment on their validity.

The Tahoe City Lodge Project and major employers in Town Centers should include transportation plans to shuttle hotel guests/employees to and from ski resorts and beaches.

The Draft Area Plan EIR/EIS must disclose that there is a potential/intent to re-purpose the DPW surface parking lot on Salmon Ave (to be built in 2015 as replacement parking for the

Kings Beach Core Improvement) as part of the Kings Beach Design Concept project being analyzed.



TRPA Goals and Policies: Recreation Element Goal R -4.9

PARKING ALONG SCENIC CORRIDORS SHALL BE RESTRICTED TO PROTECT ROADWAY VIEWS AND ROADSIDE VEGETATION.

This policy would reduce roadside parking by providing off -road parking "satellites" in conjunction with roadside barriers.

The TBAP Draft EIR/EIS must include a policy to develop a plan to implement and address the on-street parking along scenic corridors that block views of Lake Tahoe from established scenic route ratings.



6.3 Recreation Strategy

This Plan seeks to enhance recreation opportunities, support Lake Tahoe as a four-season international destination and ensure that recreation facilities do not adversely impact environmental thresholds or disturb important habitats.

Policies support dispersed recreation activities by identifying areas where low-density recreational experiences are prioritized, such as undeveloped shorelines, wilderness, and other undeveloped and roadless areas.



A park in Kings Beach

Outdoor recreational uses should be developed based on demand and be consistent with the environmental constraints and Threshold standards. Existing facilities in sensitive areas should be retrofitted to mitigate environmental impacts or relocated to higher capability land. In general, improved facilities should be developed in proximity to existing infrastructure near urban areas.

The Tahoe Basin Area Plan Draft EIR/EIS must include a policy limiting the number of private amenities (like Martis Camp Beach Shack and Ritz Carlton Beach Pavilion) within in each sub-area. Tahoe Vista will have two such properties before this Area Plan is approved. Limitation will insure public beaches are not overcrowded and there is adequate parking, public services, etc.. Possible mitigation requirement could be for private amenities to include installation of public restrooms (Sandy Beach or Moon Dune could be recipient sites) Then coordinate with State Parks or CTC to fund the Operations and Maintenance of the public restrooms as stated in: R-P-8 Coordinate with State Parks and the California Tahoe Conservancy on management, operations, and maintenance of beaches within the Plan area.

Goals and Policies Recreation Element R-5.2

REGULATE INTENSITY, TIMING, TYPE, AND LOCATION OF USE TO PROTECT RESOURCES AND SEPARATE INCOMPATIBLE USES.

This policy would regulate the intensity and type of recreation use in specific locations. Regulations will be adopted and enforced dealing with the types of use and numbers of people at one time permitted for various activities. Timing of permitted uses would be closely regulated to avoid conflict with other resources required by fish, wildlife, and vegetation. Incompatible activities between visitors would be separated by establishing use areas for dispersed recreation separate from developed recreation areas. This strategy would examine overall demand and planned capacity and determine site specific areas within the Region for the various demands to be met

TABLE 21.4-A: LIST OF PRIMARY USES AND USE DEFINITIONS	
USE	DEFINITION
RECREATION	
Beach recreation	Recreational use of a beach, supported by developed facilities such as sanitation facilities, parking, and picnic sites, and nearshore facilities such as multiple-use piers and buoys. Nearshore and foreshore facilities are included in Chapter 81: <i>Permissible Uses and Structures in the Shorezone and Lakezone</i> .

The allowable use granted for the Martis Camp amenity must be re-defined by a newly created permissible use. The use is a hybrid of commercial, membership club house, recreation, etc.

Beach Recreation should not necessarily be an (A)llowed use in North Tahoe West or West Shore sub-areas based on the abuse of the permissible use by Martis Camp Beach Shack. At the very least it should be a (S)pecial use requiring additional review and a Conditional Use Permit to insure adequate parking standards are assessed, the impacts based on the number of PAOTS where the former uses were less, scenic threshold analysis particularly in the shorezone, etc..

Placer County must work with TRPA to amend the code to create a new use and not use Beach Recreation for private amenities as an ownership privilege.

The environmental impacts of the specific site where these uses have or will be approved are greater based on granting many more PAOTS than a single family residence or small B&B would use daily. Additional parking requirements as well as VMT to an alternate site for overflow parking, staff working on-site, private fund raisers of up to 100+ people, etc. must be analyzed. The impact analysis should be based on the difference between a single family residence or whatever current use is being converted and what the increases of the use from prior use with many more people.

R-P-7

Utilize all appropriate opportunities (land acquisition, obtaining easement rights, etc.) to increase opportunities for public access to the shoreline of Lake Tahoe.

The TBAP Draft EIR/EIS should include a strategy and funding resource to remove and/or relocate the gas station in Kings Beach to a more appropriate location away for the shoreline of Lake Tahoe opening an opportunity for public access to Lake Tahoe.

R-P-10

Prohibit snowmobile uses in important wildlife habitat, including Page Meadows.

*Correct spelling for **Paige** Meadows in Draft TBAP EIR.EIS.*

The TBAP Draft EIR/EIS must provide a list of other important wildlife habitat areas i.e Martis Valley West Ridgeline (identified by the Northstar Habitat Management Plan), etc.

The TBAP Draft EIR/EIS must provide environmental analysis for the potential of Resort Recreation zoning as the Martis Valley West Area Plan has only been suspended with a proposed project of approximately 112 luxury units and commercial could that will be built in the Placer County.

7.2

Potable Water

Drinking water for the Plan area comes from Lake Tahoe, local streams, smaller lakes, and groundwater. The two largest water providers in the Plan area are NTPUD and TCPUD. Additionally, there are 13 small public and private water companies that provide drinking water to residents located outside of public utility district boundaries. See Figure 7-1 for the location and service areas for water purveyors in the Plan area

Ground Water Resources

The US Army Corps of Engineers (USACE) delineates five aquifer areas surrounding Lake Tahoe including the Tahoe City/West Shore Aquifer and Tahoe Vista/Kings Beach Aquifer. The Tahoe City/West Shore Aquifer extends from Dollar Point on the north to Rubicon Bay on the south. The estimated depth of the basin is about 590 feet. The Tahoe Vista/Kings Beach Aquifer extends from Dollar Point on the west to Stateline Point on the east. Snowmelt is the primary source of recharge to the groundwater basin. Other sources of groundwater recharge include stream-flow seepage and groundwater inflow from the surrounding bedrock. Page 2-20 Existing Conditions Report

Provide detailed environmental analysis for the state of our aquifers supply and demand for the Placer County Area Plan boundary as identified in the Existing Conditions Report.

Require proponents of new / re-development to demonstrate the availability of a long-term, reliable and adequate supply of pure, wholesome, healthful, and potable water as well as any necessary water for irrigation or other purposes. Require written certification from the service provider that either existing services are available or needed improvements will be made prior to occupancy. Test wells, appropriate hydrologic testing, and/or report(s) from qualified professionals will be required substantiating the long-term availability of sufficient and suitable groundwater. The Draft EIR/EIS should include analysis for long-term, reliable and adequate supply of all water types mentioned above.

PS-P-4

Encourage strategies to provide adequate new and more appropriate sites for existing facilities, such as the Caltrans corporation yard and Liberty Energy Tahoe City Power Substation, out of environmentally and visually sensitive areas.

Add the Liberty Utility Kings Beach generator as it could be more appropriately relocated as part of the recent system upgrade (EIR) proposed by Liberty.

PS-P-7

Ensure that all proposed developments are reviewed for fire safety standards by local fire agencies responsible for its protection, including providing adequate water supplies and ingress and egress.

Provide detailed environmental analysis that not only addresses fire safety standards for proposed development but what currently exists in the Placer County Area Plan. Provide detailed criteria proving there is sufficient water supply available for the entire Area Plan.

PS-P-8 Encourage all water systems address fire suppression water needs.

Provide detailed environmental analysis that addresses fire suppression requirements for the Placer County Area Plan Boundary

Solicit the views of the Native American Heritage Commission and shall consult directly with the Washoe Tribe of Nevada and California in cases where development may result in disturbance to sites containing evidence of Native American activity and/or to sites of cultural importance. (Include documentation in the Draft EIR/EIS that the Washoe Tribe has been notified of the newly proposed development on the West Parcel and that the Washoe tribe has responded to receipt of notification and any comments they supply. The figure below identifies historic resource areas.

