

**Statement of the League to Save Lake Tahoe on Proposed
Amendment to the Boundary of the Kings Beach Community Plan**

The League strongly supports environmentally sensitive redevelopment projects in the communities around the Lake that are suitable for such redevelopment. Kings Beach is such an area and we are pleased to see redevelopment planning underway.

However, the League strongly opposes the expansion of Community Plan boundaries. Such expansions foster creeping urbanization and create unmitigated incremental coverage concentrations. They represent precisely the **opposite** of environmental sensitivity and basic good planning. Such expansions are also unjustifiable in light of the need for the agency to attain and maintain the region's environmental threshold carrying capacity for soil coverage.

We recognize that subsidized housing is always in high demand in the Basin, as in other places where the quality of life is high. This demand extends to moderate, low and very low income, senior, disabled, and workforce housing. Every project that offers to supply any part of this demand is viewed by TRPA as deserving to have every possible presumption made in its favor.

We realize that this well-intended impulse is driving the agency to attempt to extend to subsidized housing projects the coverage rules applicable to community plan areas. These community planning rules were designed to offer commercial districts with well-established patterns of excess coverage the means to contribute to threshold attainment through communally-funded area-wide programs, rather than through parcel-level compliance with environmental restrictions, such as limits on coverage, that have already been exceeded.

The extension of community plan boundaries to make special coverage rules available to new below-market priced housing construction projects raises Regional Plan issues that require more consideration than is possible in an environmental checklist. Such an extension might well be justified, but it reflects a major regional policy decision that requires review in an environmental impact statement of the cumulative impacts of the boundary extensions that can be expected throughout the Basin. The Initial Environmental Checklist provided to support this Regional Plan change is not close to providing adequate environmental analysis.

Further, the Tahoe Regional Planning Agency is two years out of compliance with its Pathway 2007 goal for updating its regional plan. The agency cannot credibly support the necessary finding that the Regional Plan, as amended, will achieve and maintain the environmental threshold carrying capacities. This planning proposal, and other future Regional Plan amendments, should be analyzed in the EIS planned on the Regional Plan update.

These comments are confined to the issue of planning and do not reflect on the housing projects that the owners of these parcels hope to see constructed on them one day, nor on housing projects of this kind generally. Such projects may well provide benefits to the community that are worthy of providing even more special consideration in regional planning than is presently provided, such as the special coverage rules sought to be utilized here.

However, such special considerations must be extended, if at all, as part of a Regional Plan package, accompanied by full environmental review, that assures the achievement and maintenance of the environmental threshold carrying capacities for the Lake Tahoe Basin, as well as addressing housing policy for the area in a well considered way.