

September 26, 2023

Tahoe Regional Planning Agency
Regional Plan Implementation Committee and TRPA staff
128 Market St, Stateline, NV 89410
Submitted via email

Re: Proposed Phase 2 Housing Amendments

Dear RPIC Chair, members, and TRPA staff -

The League to Save Lake Tahoe (League) is dedicated to protecting and restoring the environmental health, sustainability and scenic beauty of the Lake Tahoe Basin. In connection with our mission, we advocate for the implementation of sound, environmentally-friendly policies contained within regional land use and planning documents.

We have been the only environmental group actively and continuously participating in this housing working group, and the efforts leading up to its formation over the last few years. It has been great working with the working group and TRPA staff, Karen and Alyssa especially, and our feedback and input has been heard, so far.

Our concerns have been the same from the start - coverage, density, and transportation impacts - which directly and indirectly impact Lake Tahoe's natural environment. Addressing the housing issues at Lake Tahoe is a top priority but any effort to improve housing must also ensure that we are protecting the environment.

Please consider our comments on a few specific aspects of the proposal as you develop your direction to staff on September 27th.

Coverage

As we've been saying for years, we would prefer that TRPA look at using its authority to reduce or eliminate parking minimums to reduce the coverage needed (and reduce transportation impacts) instead of allowing more coverage. We are comfortable with the coverage changes as proposed due to the requirement that stormwater must be treated onsite or through an area wide BMP/stormwater treatment system that must be managed and maintained by a government agency (new Code section 30.4.2.B.6).

Parking

We are encouraged to see TRPA take a role in parking management. AS the Cascadia background information found, parking requirements must be reduced for height, density, and coverage incentives to work. Parking must be treated similarly to the other incentives – along with the proposal to get rid of maximums for density and coverage, parking minimums should be eliminated for deed-restricted housing in Town Centers. The 0.75 maximum should be applied to the multifamily areas outside of Centers, but within the bonus unit boundary area.

Additionally, the 0.75 spaces per unit needs to be clarified. In the staff report it sounds like it's a minimum, but in the proposed Code it reads like a maximum. The Code as currently proposed, for areas outside of Centers, is preferable.

Height

We do not see the need for increased height allowances. Sixty-five feet in Town Centers is a large change and additional height outside of Town Centers does not align with the goal of concentrating development in Town Centers, and may not be a good fit for those neighborhoods and communities.

Regardless of your direction on height, the way the change is proposed in the Code for areas outside of Town centers makes it seem like the 8.5' and 11' are additive instead of one or the other as we believe is intended.

Town Center Adjacent Parcels

A lot of time and thought went into the Town Center boundaries. Giving the Town Center incentives to parcels adjacent to those boundaries should be looked at more holistically in Phase 3.

Thank you for considering our suggestions as you develop your direction to staff.

We look forward to our continued work with the Tahoe Living working group and complementing efforts to increase affordable and workforce housing while minimizing environmental impacts.

Sincerely,

A handwritten signature in black ink, appearing to read "Gavin Feiger", with a long horizontal stroke extending to the right.

Gavin Feiger
Policy Director
on behalf of the League to Save Lake Tahoe