



North Tahoe Preservation Alliance

[www.ntpac.com](http://www.ntpac.com) 775-831-0625 “helping preserve the natural beauty and rural character of North Lake Tahoe”

7/15/2015

Via email

Placer County

Environmental Coordination Services

Community Development Resource Agency

3091 County Center Drive, Ste. 190

Auburn, CA 95603

[cdraecs@placer.ca.gov](mailto:cdraecs@placer.ca.gov)

**Subject: Tahoe Basin Area Plan 2015 Notice of Preparation and draft Area Plan Package**

Dear Ms. Jacobsen:

This letter provides comments on the above mentioned NOP. The North Tahoe Preservation Alliance (NTPA) is a Nevada Nonprofit corporation formed to ensure that North Lake Tahoe retains its natural beauty and easygoing, rustic lifestyle. This letter provides comments on the Notice of Preparation that are in addition to and do not replace or otherwise supersede comments that were previously submitted. We also incorporate comments from the following organizations and individuals:

Tahoe Area Sierra Club  
Friends of the West Shore  
Ellie Waller

The NOP must adequately analyze the environmental impacts associated with the proposed Placer County Area Plan; we request that the NOP analyze the following:

1. **Document fails to address vision or conclusions of Community Plan Team members.** (Team agreed 36 feet on lakeside and 48 feet on mountainside. Density not increased from old Regional Plan) Tahoe Valley Area Plan was allowed to allow heights less than the RPU (Regional Plan Update adopted 2012), however Placer County appears to have decided against even considering team wishes. What is that rationale for not allowing the TBAP to have reduced heights and density?  
**An alternative reflecting Community Plan Team desires must be summarized for the public, compared with the TBAP and analyzed in the EIR/EIS.**
2. **NOP increases height to three stories in areas next to Town Centers (transition areas).**

*TBAP Part 4, pg 96 Core and Transition Areas*

*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.*

- A. Develop a map showing the boundaries of transition areas allowing three stories per the TBAP as compared to the same areas that are not currently allowed three stories. How many more parcels are affected by this change in the TBAP?

**Throughout the TBAP height must be in feet, not stories. Current project heights must be given as an example: Tonopalo, Doman on Hwy 28. (i.e. Current Squaw Valley controversy over height: whether 108' is 8 or 10 stories.)**

3. **NOP allows 400 secondary residences within a ¼ mile radius of Hwys 28, 89 and 267 for over 72 miles.**

- A. This creates multi-family zoning use where currently it is single family. It serves to downgrade property values and increase density.  
Provide two MAI appraisals of the values of a home with single family residential zoning on a site less than 1 acre, ½ acre and 1/3 acre and then compare the values to homes on the same sized sites in which zoning allows a secondary dwelling per the TBAP.
- B. Secondary dwellings should be limited to town centers, not the 1/4 m. distance from either side of HWYs 28, 89 and 267. The TBAP broad brush approach is inappropriate.
- C. Explain and give the rationale why all of Placer County doesn't or hasn't been proposed to allow a secondary dwellings zoning change within ¼ m. of areas served by transit?
- D. Provide the number of parcels affected by this zoning/use change.
- 4. NOP converts Commercial Floor Area (CFA) 454 sf to one TAU (Tourist Accommodation Use)(timeshare, fractional or hotel use could be up to 1800 sf in size).**  
These two uses are not equivalent. TAUs generate population increases which increase VMT and CFA does not. Analyze and explain the rationale of how 454 sf of CFA is equivalent to one TAU of 1200-1800 sf.  
Provide traffic study analyzing this use change proposal.
- 5. 4 stories allowed on lake side or 56 feet with allowances for more (Kings Beach Domas building is 48' high).** Placer County is proposing that 35% of the frontage on the lake be open or as an example, 35' of a 100 foot lot. If current side setbacks are approximately 10% of the width of a lot, analyze and explain why an increase from an approx. 20' setback to 35' (net increase of 15' to the setback or 7.5' on each side) sufficiently mitigates the impacts of 56' plus (with exceptions for additional height) buildings with the resultant loss of lake view sheds from significantly higher structures as compared to pre-RPU allowed heights on essentially flat lakefront parcels. Also, include comparisons of increases in massing between pre-RPU height allowances and RPU heights.  
**An appropriate mitigation would be to create significant new open space on the lake.**
- 6. Pilot projects (KILA LLC and Kings Beach Opportunity) should not be part of NOP, but should be separately analyzed as a new project. These pilot projects only serve to further complicate an already confusing TBAP NOP document.**

7. **Conflicting nomenclature, maps and descriptions require that a new simplified and accurate NOP be re-circulated. Just one example is the confusion surrounding “transition areas”.**

<http://www.placer.ca.gov/~media/cdr/Planning/CommPlans/TahoeBasinCUpdate/DraftAreaPlan2015/1-156%20Implementing%20Regulations%20DRAFT.pdf>

Note that outside Town Centers are called TRANSITION AREAS; as well as inside Town centers.

For each of these reasons, the NTPA, respectfully request that Placer County and TRPA, as the lead agencies re- distribute a technically and legally adequate NOP for Public review and comment that fully complies with the law and is supported by substantial evidence in light of the whole record.

Sincerely,



Ann Nichols

On behalf of the North Tahoe Preservation Alliance