

Chapter 3: Potential Housing Constraints



State housing law requires the County to review both governmental and nongovernmental constraints to the maintenance and production of housing for all income levels. Since local governmental actions can restrict the development and increase the cost of housing, State law requires the housing element to “address and, where appropriate and legally possible, remove governmental constraints to the maintenance, improvement, and development of housing” (Government Code Section 65583(c)(3)).

Potential Governmental Constraints

Local governments have little or no influence on the national economy or the federal monetary policies that influence it; yet these two factors have some of the most significant impacts on the overall cost of housing. The local housing market, however, can be encouraged and assisted locally. Part of the housing element’s purpose is to require local governments to evaluate their past performance in this regard. By reviewing local conditions and regulations that may impact the housing market, the local government can prepare for future growth through actions that protect the public’s health and safety without unduly adding to the cost of housing production.



Placer County’s primary policies and regulations that affect residential development and housing affordability include: land use controls; development processing procedures and fees; impact fees; on- and off-site improvement requirements; building and housing codes; and code enforcement. This section discusses these policies and regulations and assesses whether any serve as a governmental constraint to affordable housing development. Because development in the Tahoe Basin falls under the jurisdiction of both Placer County and the Tahoe Regional Planning Agency (TRPA), the discussion of governmental constraints also reviews impediments to affordable housing production due to the regulatory framework of TRPA.

As part of the governmental constraints analysis, the housing element must also analyze potential and actual constraints upon the development, maintenance, and improvement of housing for persons with disabilities. Additional analysis of these constraints is included at the end of this section.

General Plan and Zoning

Land use controls guide local growth and development. The Placer County General Plan, community plans, and zoning ordinance establish the amount and distribution of land allocated for different uses, including housing. The following discussion focuses on their general intent and their impact on housing production.

General Plan Land Use Designations

Placer County’s General Plan, adopted in 1994, includes a Land Use Element which sets the County’s policies for guiding local land use development. As summarized in Table 40, the land use element establishes four residential land use designations and two commercial land use designations that permit residential uses.

**Table 40. Land Use Designations Permitting Residential Use
Placer County, 2013**

General Plan Designation	Compatible Zoning Ordinance Classification	Residential Uses Allowed	Dwelling Units per Acre
AG-Agriculture	AE (Agricultural Exclusive) F (Farm)	Detached farmworker housing	1 unit/acre
RR-Rural Residential	RA (Residential-Agricultural) RF (Residential-Forest)	Detached single-family and secondary dwellings	1 unit/acre
LDR-Low Density Residential	RA (Residential-Agricultural) RS (Residential Single-Family)	Detached single-family and secondary dwellings	1–5 units/acre
MDR-Medium Density Residential	RS (Residential Single-Family) RM (Residential Multifamily) DL (Density Limitation Combining District)	Detached and attached single-family, secondary dwellings, and smaller-scale multifamily	5–10 units/acre
HDR-High Density Residential	RM (Residential Multifamily) DL (Density Limitation Combining District)	Detached and attached single-family, secondary dwellings, and all types of multifamily	10–21 units/acre
GC-General Commercial	CPD (Commercial Planned Development) C1 (Neighborhood Commercial) C2 (General Commercial) HS (Highway Services)	Multifamily housing as the primary land use or as part of a mixed-use project allowed	0–21 units/acre
TC-Tourist/Resort Commercial	HS (Highway Services) RES (Resort)	Multifamily	11–21 units/acre

Source: Placer County General Plan, 2013.

Note: The Placer Ranch, Placer County Government Center, and Sunset Area Plans will permit 30 units/acre.

Table 41. Density Standards for Residences, Placer County, 2020

Zoning District	Minimum Residential Lot Area	Maximum Residential Density (units/acre)
Single-Family Residential (RS)	10,000 square feet	4
Multi-Family Residential (RM)	6,000 square feet	single-family: 7
		multifamily: 20
Agricultural-Residential (RA)	40,000 square feet	1
Forest-Residential (RF)	10 acres	1
Neighborhood Commercial (C1)	6,000 square feet-corner lots 5,000 square feet-interior lots	Lake Tahoe area: 14 all other areas: 20
General Commercial (C2)	6,000 square feet-corner lots 5,000 square feet-interior lots	20
Commercial Planned Development (CPD)	not specified (as determined by a conditional use permit)	20
Highway Services (HS)	6,000 square feet	20
Resort (RES)	40,000 square feet	single-family: 1
		multifamily: N/A
Agricultural Exclusive (AE)	20 acres	0.05
Farm (F)	200,000 square feet	0.2

Source: Placer County Zoning Ordinance, 2020.

Other Local Community Plans

Placer County has adopted 17 community plans, some of which include affordable housing policies intended to supplement those in the general plan and housing element. All of the policies related to housing production support the need for affordable housing and do not result in additional constraints to housing production beyond those associated with the general plan.

Zoning Districts

The following discussion reviews the types and densities of housing permitted and relevant development standards in the Placer County Zoning Ordinance.

Residential Districts and Permitting

The Placer County Zoning Ordinance has four residential districts: Residential Single-Family (RS), Residential Multi-Family (RM), Residential-Agricultural (RA), and Residential-Forest (RF). There are also eight nonresidential zoning districts that allow residential uses. Table 41 shows minimum lot area and average residential density allowed in each zoning district that allows residential uses.

Table 42 summarizes the allowed housing types and applicable permit requirements for the zoning districts. If the housing type is allowable in a zone, the use is subject to one of the following land use permit requirements:

- **Allowed Use (A).** These uses are allowed without land use permit approval. No land use permit is required for “A” uses because they typically involve no or minimal construction activities, are accessory to some other land use that will be the primary use of a site, or are otherwise consistent with the purposes of the particular zone.
- **Administrative Review Permit (ARP).** ARP approval is a discretionary action required for certain land uses that are generally consistent with the purposes of the zone, but could create minor problems for adjoining properties if they are not designed with sensitivity to surrounding land uses. The purpose of an ARP is to allow Planning Department staff and the Zoning Administrator to evaluate a proposed use to assess the potential for problems, to work with the project applicant to resolve them, or to disapprove the project if they cannot be corrected.
- **Conditional Use Permit (CUP).** CUP approval is required for certain land uses that may be appropriate in a zone, depending on the design of the project and site characteristics. Such a project can either raise major land use policy issues or create serious problems for adjoining properties and the surrounding area if it is not appropriately located and designed. The purpose of a CUP is to allow Planning Department staff and the Placer County Planning Commission an opportunity to evaluate a proposed use to determine if problems may occur, to provide the public an opportunity to review the proposed project and express their concerns in a public hearing, to work with the project applicant to resolve problems, or to disapprove the project if problems cannot be corrected.

- **Minor Use Permit (MUP).** MUP approval is required for certain land uses that are generally consistent with the purposes of the zone, but could create problems not only for adjoining properties, but for the surrounding area if not designed to be compatible with existing uses. The purpose of a MUP is to allow Planning Department staff and the Zoning Administrator to evaluate a proposed use to determine if problems may occur, to provide the public an opportunity to review the proposed project and express their concerns in a public hearing, to work with the project applicant to resolve problems, or to disapprove the project if problems cannot be corrected.
- **Zoning Clearance (C).** Zoning clearance is a ministerial land use approval that involves Planning Department staff checking a proposed development to ensure that all applicable zoning requirements will be satisfied. If so, the permit is issued.

Setback Requirements

The setback requirements for residential uses in residential and commercial zones, as specified in the Placer County Zoning Ordinance, are shown in Table 43. The zoning ordinance states that residential dwellings proposed in any commercial zones shall provide side and rear setbacks as required in the Multi-Family Residential districts, except when the dwelling is in a commercial building. The setbacks, maximum coverage, and height requirements are similar to other communities throughout the State and are not considered a constraint to the development of affordable housing in unincorporated Placer County. Zoning, development standards, and permitting fees are available on the Planning Services webpages on the County website at www.placer.ca.gov.

Table 42. Housing Types Permitted by Zone, Placer County, 2020

Housing Types Permitted	RS	RM	RA	RF	C1	C2	CPD	HS	RES	AE	F
Caretaker and employee housing	-	-	-	-	C	C	C	C	MUP	MUP	MUP
Emergency Shelter, 60 or less beds	-	C	-	-	MUP	CUP	CUP	MUP	MUP	-	-
Emergency Shelter, 61 or more	-	MUP	-	-	MUP	CUP	CUP	MUP	MUP	-	-
Farmworker Dwelling Unit	-	-	A	A	-	-	-	-	-	A	A
Farmworker Housing Complex	-	-	A	A	-	-	-	-	-	A	A
Home occupations	C	C	C	C	C	C	C	C	C	C	C
Mobile home parks	-	CUP	-	-	CUP	CUP	-	-	-	-	-
Mobile homes	C	C	C	C	-	-	-	-	C	C	C
Multifamily dwellings, 20 or less units	-	C	-	-	MUP	CUP	CUP	MUP	MUP	-	-
Multifamily dwellings, 21 or more	-	MUP	-	-	MUP	CUP	CUP	MUP	MUP	-	-
Residential accessory uses	C	C	C	C	C	C	CUP	-	C	C	C
Residential care homes, 6 or less beds	C	C	C	C	-	-	-	-	C	-	C
Residential care homes, 7 or more	-	MUP	MUP	-	-	-	-	-	-	-	MUP
Accessory and junior accessory dwelling units	C	C	C	C	C	C	C	C	C	C	C
Senior housing developments	-	CUP	-	-	CUP	CUP	CUP	CUP	-	-	-
Single-family dwellings	C	C	C	C	-	-	-	-	C	C	C
SRO Housing Units, 30 or less units	-	MUP	-	-	C	CUP	MUP	CUP	C	-	-
SRO Housing Units, 31 or more	-	MUP	-	-	-	CUP	MUP	CUP	MUP	-	-
Temporary dwelling	-	-	C	C	-	-	-	-	C	C	C
Transitional and Supportive Housing	<i>Allowed with the same regulations as the single- and multifamily as they apply in the same zone.</i>										

Source: Placer County Zoning Ordinance, 2020.

Note: A proposed zoning amendment, tentatively scheduled for adoption in the spring of 2021, will allow residential uses by-right in commercial zones subject to objective design standards as set forth in the Housing Accountability Act. Additionally, the MUP will be removed in the RM zone to allow multifamily dwellings with more than 21 units, as a permitted use.

**Table 43. Setback, Lot Coverage, and Height Requirements in Residential Zones
Placer County, 2020**

Zone Designation	Front Setback	Side Setback	Rear Setback	Maximum Coverage	Maximum Height
Residential					
Single-Family Residential	20 ft.	15 ft. total, 5 ft. min.-one story; 7½ ft. min.-two stories or more	10ft. min-one story; 20 ft. min. two stories or more	40% max.-one story; 35% max. two or more stories ²	30 ft.
Multi-Family Residential	20 ft.	15 ft. total, 5 ft. min.-one story; 7½ ft. min.-two stories or more	10ft. Min-one story; 20 ft. min.-two stories or more	40% max.-one story; 35% max. two or more stories ²	36 ft. ²
Residential-Forest	50 ft.	30 ft.	30 ft.	10%	36 ft.
Residential-Agricultural	50 ft.	30 ft.	30 ft.	35%	36 ft.
Commercial					
Neighborhood Commercial	10 ft.	10 ft total; 5 ft min - all residential uses; 10 ft min - where rear lot line abuts residential zone	10 ft total; 5 ft min - all residential uses; 10 ft min - where rear lot line abuts residential zone	40%	30 ft.
General Commercial	10 ft.	5 ft total; 5 ft min – all residential uses or where side/rear lot line abuts residential zone district	5 ft total; 5 ft min – all residential uses or where side/rear lot line abuts residential zone district	40%	50 ft.
Commercial Planned Development	n/a ¹	n/a ¹	n/a ¹	50%	50 ft.
Highway Services	25 ft.	5 ft min	10 ft min	40%	35 ft.

Source: Placer County Zoning Ordinance, 2020.

¹As required by CUP or MUP. The CPD setbacks are determined by the use permit except for senior housing projects, which are specified to have a front setback of 20 feet and the sides and rear are a 10-foot minimum.

²As part of a zoning update that is anticipated to be adopted in spring of 2021, lot coverage requirements are expected to be removed for both single-family and multi-family residential zones. Additionally, the height limits in the multi-family residential zone will be increased to 50 feet.

Combining Districts

The zoning ordinance includes combining districts, which are used in conjunction with the zoning districts to address special needs or characteristics of specific areas. The following are combining districts that impact residential development in the County:

Density Limitation. Density Limitation (-DL) is a multifaceted combining district that provides special minimum lot size and density standards for certain areas where residential development may occur and where sensitive site characteristics or other special circumstances exist. The DL combining district allows for increased flexibility on lots that may be difficult to develop and encourages infill development through reduced setback and lot-size requirements. The DL combining district also allows greater maximum lot coverage than the base residential zone districts (RS and RM).

In the RS and RM zone districts, the front setback is 20 feet; the side setbacks are 15 feet total, a 5-foot minimum for one story and a 7.5-foot minimum for two stories; and the rear setback is 10 feet minimum for one story and 20 feet for two stories. The maximum site coverage is 40 percent for one story and 35 percent for two stories. In the DL combining district, these standards are relaxed; the front setback is reduced to 12.5 feet, the side setback is 5 feet for one story and 7.5 for two stories or more, and the rear setback is 10 feet. The maximum site coverage is increased to 50 percent for one story and 40 percent for two stories.

The DL combining district helps implement the General Plan for some cases where higher densities may not be appropriate by allowing flexibility on lot coverage, but maintaining the maximum number of dwelling units permitted by the general plan designation applicable to the parcel. In cases where higher densities are appropriate, the DL combining district allows for greater lot coverage than the base residential zone and can permit up to 22 units per acre, which is the maximum permitted by the zoning ordinance.

Building Site. The Building Site (-B) combining district allows parcels in new subdivisions to differ in size from what the zoning ordinance would otherwise allow. The parcel size is based on special characteristics of the site

such as environmental characteristics and community character. The building site combining district allows lots as small as 3,000 square feet.

Design Review. The Design Review (-Dc, -Dh, -Ds) combining districts create regulations for protecting and enhancing the aesthetic value of lands or specific buildings. The three design review combining districts are “design scenic corridor” (-Dc), “design sierra” (-Ds), and “design historic”(-Dh).

Dc and Ds designations are applied to areas of special natural beauty and aesthetic interest that contribute to the County’s tourism economy. The Dh designation establishes regulations for areas or buildings of historical or cultural significance in the County. These areas require special considerations to preserve existing residential structures as a community resource. Development restrictions are imposed in the Dh combining district related to the demolition, removal, relocation, or alteration of any residential building, structure, or site in the Dh combining district without a permit. Once a design review designation has been made by the zoning board, no new construction or changes to existing buildings can be made without gaining design review approval.

Planned Residential Development. The zoning ordinance implements the Planned Residential Development land use overlay through the Planned Residential Development (PD) combining district. This designation allows flexibility of standards and density requirements, and encourages cluster development, mixed-use, apartments, and condominiums in areas specified in the County General Plan and other community plans. All PDs are to be consistent with the goals and policies in the general plan and all community plans and are to follow the design guidelines applicable to the specific PD area. The designation is a combined land use designation, and the population density and building intensity standards of the base designation apply. The allowable density in the PD zone is determined by multiplying the residential intensity allowed in the base designation by the net buildable area of the site.

Growth Management

Growth management is a tool that local governments use to prevent urban sprawl and preserve natural resources and agriculture. Growth management measures, such as urban limit lines (ULLs), can in some instances increase the cost of affordable housing by limiting the amount of land for new development. Though Placer County does not have a ULL, a policy in its 1994 General Plan references growth management. Policy 1.M.1 in the Land Use Element states:

“The County shall concentrate most new growth within existing communities emphasizing infill development, intensified use of existing development, and expanded services, so individual communities become more complete, diverse, and balanced.”

The General Plan also recognizes that as the County continues to grow, additional areas may be identified as being suitable for development at urban or suburban densities and intensities.

The County requires the preparation of individual General Plan Amendments and specific plans for new development areas to determine the most appropriate arrangement and mixture of land uses, circulation system layout, extent of infrastructure and public services, and institutional framework necessary to accommodate development. Where appropriate, annexation is considered first for proposed urban projects. In recent years, the County has annexed four areas—Greenbrae Island to the City of Rocklin (2015), Amoruso Ranch to the City of Roseville (2016), Village One to the City of Lincoln (2016), and Lincoln Meadows to the City of Lincoln (2019). The County supports logical, planned growth contiguous to existing urban areas and approved or amended four significant specific plans (Bickford Ranch, Placer Vineyards, Riolo Vineyards, and Regional University) within the last five years and is currently processing the Squaw Valley Specific Plan.

In conclusion, the County’s growth management policy does not limit the development of affordable housing, but rather focuses on creating mixed-use, and mixed-income communities by developing in areas with services

and opportunities (such as schools, employment centers, and public services such as libraries) already in place. The policy reduces potential for segregation by encouraging diversity in housing types within individual communities.

Building Codes and Enforcement

Building codes and their enforcement influence the style, quality, size, and costs of residential development. Such codes can increase the cost of housing and impact the feasibility of rehabilitating older properties that must be upgraded to current code standards. In this manner, buildings codes and their enforcement act as a constraint on the supply of housing and its affordability.

On January 1, 2020, Placer County adopted the 2019 California Building Code (CBC) and the associated CAL-Green Code and California Referenced Standards Code via Ordinance 5994-B. Placer County has not made significant additions to the CBC for residential construction in the lower elevations of the County not subject to annual snowfall. Slight modifications—such as special roof design requirements to accommodate snow loads and avalanche protection standards—have been made for construction above an elevation of 5,000 feet. These modifications limit the use of new manufactured housing on individual lots, which limits the affordable housing options on vacant lots in the Tahoe Basin portion of the County, and in situations where a unit beyond rehabilitation needs replacement. The County also added additional special soil testing requirements given the unique soil mixes in certain areas.

Beginning in 2008, new fire safety amendments in Chapter 7A of the CBC made building standards more stringent in the Wildland-Urban Interface (WUI). The broad objective of the WUI Fire Area Building Standards is to establish minimum standards for materials and material assemblies and provide a reasonable level of exterior protection from wildfire exposure to buildings in WUI fire areas. It requires the use of ignition-resistant materials and design to resist the intrusion of flame or burning embers projected by a vegetation fire (wildfire exposure).

The County has also adopted the State’s Residential Code. The Residential Code regulates the condition of habitable structures with regard to health and safety standards and provides for the conservation and rehabilitation of housing in accordance with the CBC.

As with most jurisdictions, the County responds to code enforcement problems largely on a complaint basis. The usual process is to conduct a field investigation after a complaint has been submitted. If the complaint is valid, the immediacy and severity of the problem are assessed. The County’s philosophy is to effectively mitigate serious health or safety problems while allowing the property owner a reasonable amount of time and flexibility to comply. The more pressing the problem, the more urgent the County action. The County usually achieves compliance with the codes through a combination of letters, phone calls, and/or site visits. In cases where the problems are severe and appeals for voluntary solutions are unsuccessful, the County will take more aggressive action. In rare cases, the housing units may be declared hazards and posted as such and/or legal compliance may be forced through action taken by the District Attorney or County Counsel’s office.

In conclusion, the County’s building codes are consistent with the codes used in other jurisdictions throughout California and do not negatively impact the construction of affordable housing. The County attempts to find a balance between ensuring that housing is safe and avoiding the potential loss of affordable housing units through unnecessarily strict enforcement practices. Based on discussions with the County, there is no indication that code enforcement practices have unduly penalized older dwellings or have inhibited rehabilitation.

Design Review

Design review requirements can sometimes increase the cost of housing, particularly requirements for additional costly features to be provided in a multifamily housing development. As discussed in the Combining Districts section, the zoning ordinance allows establishment of design review combining zones in which all new construction or changes to existing lands or structures cannot occur without design review approval. Construction in specific areas of the County must adhere to

design standards described in the Placer County Design Guidelines, Rural Design Guidelines, North Auburn Design Guidelines, and North Tahoe Design Guidelines.

The Placer County General Plan includes policies and programs to allow flexibility in the design review process in order to promote affordable housing projects. Program HE-5 states that the County shall review and update policies and requirements of the Placer County Design Guidelines Manual, Landscape Design Guidelines, and community design elements of the various community plans to ensure development standards are objective. The County shall only deny a development project based on development standards if such standards are objective, quantifiable, written development standards, conditions, and policies.

The Placer County Code, Zoning Ordinance, and Design Guidelines authorize the County to allow flexibility in applying design guidelines based on the merits of individual projects for issues such as buildings arrangements, setbacks, walls, off-street parking, and landscaping.

In conclusion, design review is not a significant impediment to the development of affordable housing in Placer County. The County allows flexibility in the design guidelines for affordable housing projects.

Processing and Permit Procedures

Similar to other jurisdictions, the County has several procedures it requires developers to follow for processing development entitlements and building permits. Although the permit approval process must conform to the Permit Streamlining Act (Government Code Section 65920 et seq.), housing proposed in the County is subject to one or more of the following review processes: environmental review, zoning, subdivision review, specific plan development and review, use permit control, design review, and building permit approval.

The County employs a zoning administrator to serve as a hearing officer who is assigned the authority and original jurisdiction to investigate, consider, and approve or deny administrative review permits, minor use permits, and variances. The usual turnaround for a zoning administrator decision is 30 to 60 days after the receipt of a complete application.

Residential development projects requiring environmental review and a discretionary planning approval (conditional use permit) that are on flat ground with available sewer, water, and electricity take an average of six to eight months to process through the Placer County Planning Department; more complicated sites typically take more time. Longer processing times may result from site constraints (e.g., wetlands, vernal pools, steep slopes, paleontology or archaeology finds), inadequate application materials, and/or review and comment by numerous other agencies.

Consistent with Senate Bill (SB) 330, housing developments for which a preliminary application is submitted that complies with applicable general plan and zoning standards are subject only to the development standards and fees that were applicable at the time of submittal. This applies to all projects unless the project square footage or unit count changes by more than 20 percent after the preliminary application is submitted. The developer must submit a full application for the development project within 180 days of submitting the preliminary application.

Placer County requires predevelopment meetings with applicants of larger projects prior to submission of formal applications to better define the information needed to review a project. Predevelopment meetings have helped to shorten the review process and allow for better communication between applicants and County departments.

As required by the California Environmental Quality Act (CEQA), the County's permit processing procedures include an assessment of the potential environmental impacts of the proposed project. The environmental review process helps protect the public from significant environmental degradation and inappropriate siting of developments. It also gives the public an opportunity to comment on project impacts. However, if a project requires an environmental impact report (EIR), additional processing, cost, and time are required. An EIR is an in-depth analysis of the potentially significant environmental impacts of a project. EIRs may take nine months or longer to complete depending on the project's complexity. The Placer County Environmental

Review Ordinance provides an exemption for residential construction totaling no more than four dwelling units and for no more than six dwelling units in urbanized areas. Projects consisting of seven or more units may not have an environmental exemption.

CEQA compliance is the first step in the review of a project—prior to scheduling any permit or application before a hearing body. After completing the initial study, if County staff determines that the proposed project will have no significant adverse impact on the environment, the applicant will be notified that a negative declaration (or mitigated negative declaration) will be prepared by County staff and distributed for public review. If staff determine that the project may have a significant impact, an EIR will be required. Once it has been determined that the EIR is acceptable, it is distributed for public review. After either the negative declaration (or mitigated negative declaration), or EIR has been completed, the applicant may file the tentative map or subsequent entitlement application, and a public hearing will be set to consider the CEQA document and any other entitlements.

On July 1, 2020, implementation of the State's change to CEQA under Senate Bill (SB) 743 became effective and requires that lead agencies no longer use Level of Service (LOS) as a measure for transportation impacts. Rather, lead agencies are required to use Vehicle Miles Traveled (VMT) to assess transportation impacts in CEQA documents. The state's requirement to transition from LOS to VMT is aimed at promoting infill development, public health through active transportation, and a reduction in greenhouse gas emissions. This change creates a paradigm shift for transportation impact assessment and could present some challenges for project implementation. In December 2018, the State's Office of Planning and Research (OPR) developed a Technical Advisory on Evaluating Transportation Impacts in CEQA, which provides guidance for lead agencies. The Technical Advisory is a guidance document and does not eliminate the discretion lead agencies have when preparing CEQA documents. Lead agencies, such as Placer County, have the discretion to establish their own thresholds and screening criteria. Based on Placer County's diverse land use context, including established, developing, and

rural sub-regions, as well as the Tahoe Basin, county staff has been exploring threshold and screening options that recognize this diversity.

The level of analysis for new projects will be determined based on the project's characteristics, such as type, size, location, etc. Typical projects in unincorporated Placer County will fall into one of three types based on their individual characteristics: Projects consistent with OPR's screening criteria (which is applicable to deed-restricted affordable housing projects and other small subdivisions), projects that qualify to use the Placer County VMT estimation tool, or larger projects that require a full VMT analysis.

Additionally, the County realizes that it may be difficult for individual projects to mitigate VMT impacts on their own. As such, the County will strive to address potential VMT impacts at a community-level by evaluating strategies and mitigation measures to better connect transportation and land use.

County staff is currently preparing recommended screening criteria and threshold options, which will be adopted at a Board of Supervisors hearing in Fall/Winter 2020.

Residential projects that are permitted as a "matter of right" and do not need discretionary approval include: single-family residences; accessory dwelling units including junior accessory dwellings; and multifamily projects within the Residential Multi-Family and Commercial zoning districts. The Placer County Board of Supervisors adopted Ordinance 6022-B on June 9, 2020, to amend the zoning code to clarify the distinction between multifamily buildings and single-family buildings with ADUs or JADUs. The ordinance also expanded the range of zones in which ADUs and JADUs are permitted by right to include Zones C1, C2, CPD, and HS. The processing time for these permits, which is primarily tied to the building plan check process, typically ranges from four to six weeks.

Some projects require discretionary review (minor use permit or conditional use permit). As previously shown in Table 42, multifamily projects in the Residential Multifamily (RM) zoning district with more than 20 units,

and all multifamily projects in the Neighborhood Commercial (C1) district require a minor use permit, which is reviewed by the Planning Department staff and Zoning Administrator and discussed at a public hearing. A future update to the housing code, currently targeted for adoption by March 2021, may amend this section.

Residential projects require a conditional use permit (CUP) in the General Commercial (C2) district. The findings for CUPs that are used by the County for project approval include

- Comparison of the benefits or adverse impacts of the proposed project versus traditional lot-and-block development of the property, and a conclusion that the planned development proposal is or is not the superior method of development for the site in question.
- Summary of the benefits or adverse impacts to the community as a result of density increases realized by the project by using this process, and a conclusion regarding the appropriateness of any increased density in the project based upon specific features of the planned development proposal.
- Physical design of the proposed development and the manner in which the design does or does not make adequate provision for public services, control over vehicular traffic, and the amenities of light and air and recreation and visual enjoyment.
- Site for the proposed development is physically suitable for the type and proposed density of development.
- Proposed use is consistent with the character of the immediate neighborhood and will not be contrary to its orderly development.

The County expedites permit processing for development projects with a low-income residential component through its Permit-Streamlining Program and prioritizes low-income and senior housing projects in the development review process. For all other projects, the typical permit procedures and timelines are shown in Tables 44 and 45.

Table 44. Timeline for Permit Procedures, Placer County, 2020

Type of Approval or Permit	Typical Processing Time	Approval Body
Annexation**	1 year	Board of Supervisors
EIR	1 to 2 years	Planning Commission
Mitigated or Negative Declaration	3 to 6 months	Zoning Administrator/ Planning Commission
General Plan Amendment	6 months to 2 years	Board of Supervisors
Planned Development	6 months to 1 year	Planning Commission
Site Plan and Design Review*	1 to 3 months	Design/Site Review Committee
Density Bonus	Included with entitlement processing; not a stand-alone process	Varies
Specific Plan**	2 to 3 years	Board of Supervisors
Subdivision Map	6 months to 2 years	Planning Commission
Conditional (Major) Use Permit	6 months to 1 year	Planning Commission
Minor Use Permit	30 to 90 days	Zoning Admin* or Planning Commission
Variance	30 to 60 days	Zoning Administrator/ Planning Commission
Rezone**	1 to 2 years	Board of Supervisors

Source: Placer County Planning Department, 2020. Notes:

* When exempt from CEQA; otherwise approval body is Planning Commission

** Upon recommendation from the Planning Commission

Table 45. Typical Processing Procedures by Project Type, Placer County, 2020

	Single Family Unit	Single Family Unit (Master Plan)	Subdivision**	Multifamily**
	Building Permit/ Plan Check	Building Permit	Tentative Map	Site Plan and Design Review
			Initial Study/Mitigated or Negative Declaration	Categorical Exemption
			Final Map	Initial Study/Mitigated or Negative Declaration
			Development Agreement (optional)	Development Agreement (optional)
Estimated Total Processing Time	4 to 6 weeks	2 to 4 weeks	6 months to 2 years	6 months to 1 year

Source: Placer County Planning Department, 2020.

Permit application processing time does not constitute a barrier to the development of housing. In January 2021, 96 percent of residential projects requiring a full review were completed within four weeks (from application submittal to issuance of a building permit), and 89 percent of over-the-counter residential projects (from application submittal to issuance of a building permit), were completed within the same day.

In conclusion, processing and permit procedures do not constitute a development constraint in Placer County. The County's Permit-Streamlining Program places priority on affordable and senior housing projects, expediting the process.

Reasonable Accommodations

In accordance with SB 520 (Chapter 671, Statutes of 2001), Section 17.56.185 was added to the zoning ordinance to establish a formal procedure for persons with disabilities seeking equal access to housing to request reasonable accommodation(s) in the application of the County's land use regulations and to establish relevant criteria to be used when considering such requests. Additionally, the County provides information on the County's website and at the front counter/permit center in the Placer County Community Development Resources Agency Building.

The decision as to whether to approve or deny a request for accommodation is based on findings related to the following factors:

- Whether the property will be used by an individual with a disability
- Whether the request is necessary to make specific housing available to an individual with a disability
- Whether the requested reasonable accommodation would require a fundamental alteration in the nature of a County code provision
- Potential impacts on surrounding uses, and
- Physical attributes of the property and structures.

Additionally, County approves reasonable accommodations requests provided that they are found to conform to the requirements of the California Building Code.

The County code defines "family" as "one or more persons occupying a dwelling and living as a single, nonprofit housekeeping unit, as distinguished from a group occupying a hotel, club, fraternity or sorority house. A family includes any servants and four or fewer boarders". This definition is not considered a constraint to housing for those with disabilities.

The County has included program 39 to review reasonable accommodation approval findings to ensure they are consistent with State Law.

Development Fees and Exactions

The County collects fees to help cover the costs of permit processing, environmental review, building inspections, and capital improvements. Fees collected by the County in the review and development process do not exceed the County's costs for providing these services. Fees charged for building permits are based on the construction values prescribed by the California Building Code. The County collects capital improvement fees (impact fees) in accordance with California Government Code Sections 66000 to 66025 for the provision of services such as water, sewers, and storm drains. These fees are generally assessed based on the number of units in a residential development. When raising fees, the County complies with applicable provisions of the California Government Code. Table 46 shows the major application-related fees according to the 2019 fee schedule for Placer County.

Fee Waivers

The County waives 50 percent of the development fees over which it has direct control for residential projects with 10 percent of units affordable at the very-low-income level or 20 percent of units affordable at the low-income level. Service and mitigation fees, such as water, sewer, and school impacts, will be considered for waivers if an alternative source of funding is identified to pay these fees. However, service and mitigation fees, also known as capital improvement fees, are the largest component of residential development fees.

**Table 46. Major Fees Associated with New Housing Development
Placer County, July 2019**

Type of Fee	Amount
Planning Review	
Plan Check	50% of Total Valuation x \$0.007
Building Permit	Total Valuation x \$0.007
Inspection Fees (plumbing, elec., mech.)	60% of County Engineer's estimate
Conditional Use Permit	Initial Fee/Deposit: \$4,676
Minor Use Permit	» Type A: \$3,499 » Type B: \$2,375 » Type C: \$2,333
Tentative Map	(four lots or less): \$1,611 + \$110/lot (five lots or more): \$1,636 minimum fee/deposit plus staff costs +\$110/lot
Major Subdivision (50+ units)	Staff cost of project review
Design Review	» Type A: \$4,660 minimum fee/deposit plus staff costs » Type B: \$4,660 minimum fee/deposit plus staff costs » Type C: \$2,200 » Type D: \$869 » Single-Family Dwelling: \$263
Annexation/Policy Changes	
Variance	\$1,593
Minor Boundary Line Adjustment	\$1,020 per adjustment
Voluntary Merger	\$150
Minor Land Division	\$1,594 per resulting lot
General Plan Amendment	\$4,185 min. fee/deposit plus staff costs
Rezoning/Zoning Text Amendment	\$3,557 minimum fee/deposit plus staff costs
Other	
Appeals to Staff and Planning Commission	\$619
Development Impact Fees	
Fire Development Fees	Fees depend on location; set by local fire protection agencies in unincorporated Placer County
Sewer ¹	(3 different sewer maintenance districts) » Single family dwelling hook-up fee: \$1,500–\$10,519 » Annexation Fee: \$194–\$6,344/acre » Single-family dwelling average user fee: \$85 per month
Traffic Mitigation Fees	(See Table 50)
Park Fee	» Single-family dwelling: \$4,785 » Multi-family/Second Dwelling/Mobile Home: \$3,480 » Senior Dwelling: \$3,150 » Subdivision: \$9,570 maximum, varies

Source: Placer County Plan Check Schedule and Planning Fee Schedule, July 2019

¹ Average fee based on service fees effective Sept 10, 2019 for three sewer districts in the County.

**Table 47. TRPA Base Fees for New Residential Construction
Tahoe Basin, Effective January 28, 2020**

Residential Use Category*	Base Fee
Single-family Dwelling, Summer Home, Secondary Residence, one Mobile Home Dwelling, and one Employee Housing unit	\$1.34 per sq. ft. of floor area \$670 min.
Multiple Family Dwelling, Multiple Person Dwelling, Nursing and Personal Care, Residential-care, more than one Employee Housing unit, more than one Mobile Home Dwelling	\$2,946 + \$54/unit

Source: Tahoe Regional Planning Agency Application Filing Fee Schedule, Effective January 28, 2020. Notes:

*All application fees waived with projects that use new affordable, moderate, or achievable housing bonus units. Other fees would still be applicable.

Residential development in the Tahoe Basin portion of the County is subject to additional TRPA fees. TRPA’s filing fee schedule categorizes residential projects into two groups: single-family and multifamily new construction. Table 47 shows the base fees for the two types of residential developments.

Depending on the required level of review (staff, hearing officer, or governing board review) and the location

of the project, the total fee may be greater than the base fee. The majority of projects are reviewed at the staff level. The TRPA hearing officer or governing board generally only review residential projects identified as a “Special Use” in the applicable plan area statement. Fees for revisions to the original plan are also determined by applying a multiplier to the original project fee. Table 48 summarizes TRPA’s fee multipliers.

Table 48. TRPA Fee Multipliers, Tahoe Basin, Effective January 28, 2020

Level of Review	Multipliers
Staff Level Review	1.00
Hearing Officer Review	1.40
Governing Board Review	1.80
Plan Revisions	
Minor—A non-substantive change to a permitted project. A project that will not cause changes to any TRPA permit conditions, does not require new field review by TRPA staff, does not require a public hearing, and does not involve any modifications to building size, shape, land coverage, location, or scenic rating score.	0.40
Major—A substantial change that does not significantly exceed the original scope of the project. Revisions that significantly exceed the original scope of a project, or which require a public hearing, shall be treated as new or modified projects, as the case may be.	0.70
Special Planning Area	
For projects located in an adopted community plan area, or subject to an adopted redevelopment, specific, or master plan.	1.25

Source: Tahoe Regional Planning Agency Application Filing Fee Schedule, Effective January 28, 2020.

Projects are subject to other TRPA filing fees such as the \$117 I.T. surcharge applied to each application for maintenance of the TRPA database, and the \$400 Shoreland scenic review fee applied to projects in the Shoreland area of Lake Tahoe. Table 49 lists these and other fees charged by TRPA in the land development process.

In addition to the project application fees, mitigation fees are required by TRPA for all projects in the Lake Tahoe Basin. No exemptions for affordable housing are provided. These fees are the same for single-family or multiple-family housing:

- **Water quality mitigation fee:** \$1.86 per square foot of land coverage.
- **Off-site land coverage mitigation fee:** \$8.50 to \$25 per square foot of coverage depending on watershed.
- **Air quality mitigation fee:** \$325.84 per daily vehicle trip end (DVTE) for single-family dwellings only.

Together, TRPA mitigation fees for a 2,000-square-foot single-family home would cost approximately \$21,045.

Traffic Mitigation Fees

In 1996, Placer County adopted the Countywide Traffic Impact Fee Program, which requires new development in the unincorporated areas to mitigate impacts to the roadway system by paying impact fees. The fees collected through this program are used to construct the roads and other transportation improvements that are needed to accommodate new development. The program divides the County into 11 benefit districts, and the fees collected within each district are applied only to roadway improvements within that particular benefit district (see Table 50).

Typical Residential Development Fees

Table 51 summarizes the typical fees that would apply to a typical single-family residence and multifamily unit in Placer County. These development fees total approximately \$41,788 for a typical 1,500-square-foot single-family home and \$29,688 for an 800-square-foot multifamily unit.

Table 49. Other TRPA Fees, Tahoe Basin, Effective January 28, 2020

Category	Fee
Shoreland Scenic Review Fee—For new construction projects, and additions and other construction modifications to existing structures located in the “shoreland” area of Lake Tahoe.	\$536 min. fee, deposit account
Information Technology (I.T.) Surcharge—applied to all applications	\$117
Unit Allocation Transfer	\$710
Land Coverage Transfer	\$710
Lot Line Adjustment	\$1,285 (2 lots) + \$134 per add. lot

Source: Tahoe Regional Planning Agency Application Filing Fee Schedule, January 2020.

Table 50. Traffic Mitigation Fees by Benefit District, Placer County, 2020

Benefit District	County Fee per DUE	Highway 65 Fee per DUE	SPRTA Regional Fee per DUE	PC/CR Fee Per DUE	Total Fee per DUE
Auburn/Bowman	\$5,608	-	-	-	\$5,608
Dry Creek	\$3,534	-	\$691	\$864	\$5,089
Foresthill	\$5,196	-	-	-	\$5,196
Granite Bay	\$7,039	-	\$689	-	\$7,728
Meadow Vista	\$5,710	-	-	-	\$5,710
Newcastle/Horseshoe Bar/Penryn	\$5,441	-	\$1,690	-	\$7,131
Placer Central	\$2,342	-	\$2,130	-	\$4,472
Placer East	\$3,789	-	-	-	\$3,789
Placer West	\$2,901	-	\$1,628	\$188	\$4,717
Sunset	\$3,328	\$1,608	\$1,420	\$281	\$6,637
Tahoe	\$5,440	-	-	-	\$5,440

Source: Placer County Department of Public Works, October 2020. Notes:

DUE = Dwelling Unit Equivalent. DUE is a term used to compare the vehicular traffic generated by different land uses to that of a single-family residential unit. The DUE factor for each land use category takes into account the number of trips made within the afternoon peak hour, the average length of each trip in miles, and the percentage of new trips resulting from that land use. The DUE for a single-family unit would be equal to one since it is the standard. Nonresidential uses are typically expressed in terms of DUEs per 1,000 square feet. For example, a 2,000-square-foot office building would have a DUE of about 7.9 times that of a single-family unit.

County fees effective 10/1/2020 (Sunset 2/2020, Tahoe 8/2017); SPRTA fees effective 7/1/2020; Hwy 65 JPA fees effective 7/1/2020.

SACOG Fee Study

In 2020, SACOG completed a comparative study of the level of impact fees required by each jurisdiction in the SACOG region. As shown in Figure 4, on a per-unit basis, the total fees charged for single-family homes built in Placer County fell within the middle of the range of SACOG jurisdictions, as did those for multifamily units. In 2020, Placer County charged comparable levels of total fees for single-family homes as were charged for Sacramento County in the Carmichael and Arden-Arcade areas as well as in Galt and Folsom south of US-50.

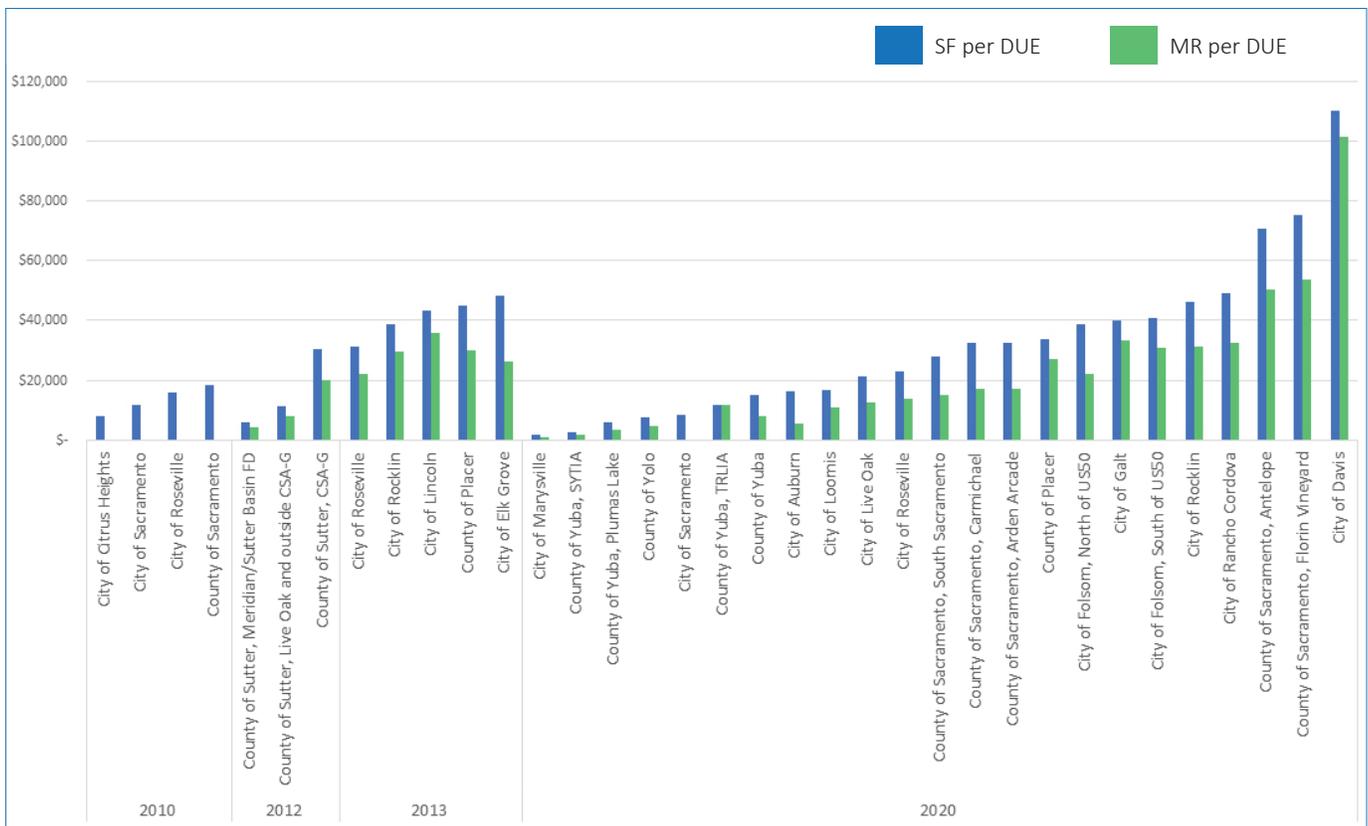
Among multifamily per-unit fees, Placer County's fees were comparable to those of Folsom in the area south of US-50 and the cities of Rocklin and Rancho Cordova. Sewer fees represented the largest percentage of the overall fee for both types of development. However, no single fee category represented a large percentage of the overall fees for either type of development, as compared to jurisdictions such as Davis that have significant housing fees.

Table 51. Typical Residential Development Fees, Placer County, 2020

Type of Fee	Single Family	Multifamily
Sewer Hook-Up Fee	Low: \$5,549 High: \$10,519	Low: \$5,549 per unit High: \$10,519 per unit
School Fee	\$1.28–\$5/sq. ft. \$4,710 avg. based on 1500 sq. ft. residence	\$1.28–\$5/sq. ft. \$2,512 avg. based on 800 sq. ft. unit
Building Permit Fee	\$2,924 based on 1500 sq. ft. residence	\$1,335 based on 800 sq. ft. unit
County Traffic Fee	Low: \$3,729 High: \$7,617	Low: \$2,908 High: \$5,941
Fire Fee	\$.59/sq. ft. \$885 based on 1500 sq. ft. residence	\$.59/sq. ft. \$472 based on 800 sq. ft. unit
Facility Fee	\$4,603	\$3,305
Park Fee	\$775	\$550
Water (PCWA): base connection	Low: \$13,599 High: \$48,348	Low: \$5,440 High: \$7,736
Total Average Cost	\$58,577	\$27,270

Source: County of Placer Development Impact Fee Schedule, February 2020

Figure 4. Single-Family and Multifamily Unit Fee Totals Charged by Cities and Counties



Source: SACOG Fee Study, 2020

On-/Off-Site Improvement Requirements

Placer County requires the installation of certain on-site and off-site improvements to ensure the safety and livability of its residential neighborhoods. On-site improvements typically include street, curb, gutter, sidewalk, and utilities as well as amenities such as landscaping, fencing, streetlights, open space, and park facilities. Off-site improvements typically include:

- Road improvements, including construction of sections of roadway, medians, bridges, sidewalks, bicycle lanes, and lighting;
- Drainage improvements, including improvement to sections of channel, culverts, swales, and pond areas;
- Sewage collection and treatment;
- Water systems improvements, including lines, storage tanks, and treatment plants.
- Public facilities for fire, school, and recreation;
- Geological hazard repair and maintenance where appropriate.

Typically, on-site and off-site improvement costs associated with residential projects are passed on to the homebuyer as part of the final cost of the home.

Other typical off-site improvements for both single-family and multifamily developments might include: recreational trail facilities, traffic control needed to serve the development, street trees, and landscaping. Utilities may need to be upgraded or installed to serve the development, including water mains, sewer mains, storm water pollution prevention measures, and undergrounding of electric utilities.

For developments where road improvements need to be added, the County's requirements differ depending on the type of road that is to be added. Street improvement requirements are as follows:

- **Rural Minor Residential:**
 - 40-foot easement
 - 24-foot roadway (12-foot traffic lane)
- **Rural Secondary:**
 - 40-foot easement (minimum.)

- 32-foot roadway (16 foot traffic lane)

- **Urban Minor:**

- 44-foot easement
- 24-foot roadway (12-foot traffic lane)
- 5-foot sidewalk

- **Urban Secondary:**

- 50-foot to 58-foot easement
- Residential:
 - » 34-foot roadway (11-foot traffic lane + 6-foot to lip of gutter)
 - » 5-foot sidewalk
- Commercial, Industrial:
 - » 40-foot roadway (12-foot traffic lane + 8-foot paved shoulder)
 - » 6-foot sidewalk

- **Urban Primary:**

- 90-foot easement
- 72-foot roadway (two 12-foot traffic lanes each direction, 5-foot to gutter, 14-foot for two-way left turn lane in center)
- 6-foot sidewalk

Off-Street Parking

Since off-street parking often requires large amounts of land, parking requirements are one of the development standards that can most negatively impact the development of affordable housing. Off-street parking requirements increase the cost of development, limiting the funds available for providing housing. Parking standards in most jurisdictions do not necessarily represent the needs of the people living in the developments. This is especially true for senior and affordable housing developments where occupants are less likely to require more than one parking space.

The cost of land associated with parking, in addition to the costs of construction, paving, and maintenance, drive up the overall cost of development and therefore the cost to provide affordable housing.

Placer County’s off-street parking standards for residential uses, as required by Zoning Ordinance Section 17.54.060, are as follows:

- **Single-family dwellings:** two spaces per dwelling unit or four off-street parking spaces per unit not in a carport or garage if (1) the dwelling unit fronts a road with “no parking” signs and/or (2) if the road has an improved width of less than 32 feet.
- **Two-family dwellings and townhouse units:** two spaces per dwelling unit or four off-street parking spaces per unit not in a carport or garage if (1) the dwelling unit fronts a road with “no parking” signs and/or (2) if the road has an improved width of less than 32 feet.
- **Multiple-family dwellings:**
 - Studio and One-Bedroom: one space per dwelling unit plus one guest space for each four dwelling units.
 - Two-Bedroom or larger: two spaces per dwelling unit plus one guest space for each four dwelling units.
- **Senior housing:** One and a half spaces for each dwelling unit.
- **Accessory dwelling units:** One space per accessory dwelling unit.
- **Farmworker housing (dwelling unit or housing complex):** One space per dwelling unit or one space per every three beds (whichever is more) and one space per housing complex employee.

The Placer County Zoning Ordinance requires parking spaces to be a minimum of 9 feet in width and 20 feet in depth. The average parking space in a large parking lot requires 300 to 350 square feet of land; this includes access lanes and landscaping requirements.

The County permits parking exceptions in the Tahoe Basin Area Plan that allow developers to contribute to transit in lieu of parking requirements. Developers that pursue this option do so through participating in a zone of benefit and paying an annual fee for transit. The County is also considering modifying the Tahoe Basin Area Plan parking standards to reduce or eliminate

parking requirements for land development in the Town Center and the creation of parking districts and a parking management program.

In the Kings Beach, Tahoe City, Tahoe Vista, and West Shore areas in the Tahoe Basin, shared parking is permitted. Shared parking facilities may be approved if two or more users/applicants execute and record reciprocal agreements for shared parking if and when the uses have different peak periods and parking demand will not overlap.

If requested by the applicant, Placer County grants parking reductions to affordable housing developers. The reductions are consistent with the Statewide Parking Standards for Affordable Housing (see Density Bonus) and can significantly reduce the costs associated with parking.

Placer County Zoning Ordinance Section 17.54.120 allows for administrative relief from the zoning code standards for infill and/or affordable housing projects. Up to a 10 percent reduction in the parking standards is allowed provided that the required amount of parking is unreasonable given the type of development.

In conclusion, Placer County’s parking standards are similar to those in other jurisdictions, and therefore do not represent a development constraint beyond that of other counties. Additionally, the County offers reduced parking standards as an incentive for affordable housing developers.

Streets

The County may require the following street improvements for all new residential development with the exception of single-family dwellings on individual lots. The standard required street improvements for new developments and new phases of established developments are:

- Road widening on the project’s frontage to one-half the total amount indicated in the Land Use/Circulation Diagrams and Standards found in the General Plan;

- Construction of up to one lane of road widening plus shoulders or on-street parking, except where additional widening for tapers, driveways, transitions or turning lanes are associated with the project, in which case additional widening may also be required;
- Street lighting may be required in major commercial areas;
- Concrete curb, gutter, and sidewalk are required in urban areas and may be required for any development.

In conclusion, site improvements in the County are those typically associated with development for on-site improvements (fronting streets, curb, gutter, sidewalk, and utilities) and off-site improvements (road improvements, drainage, sewer/water, schools, and parks). Therefore, these are costs that will be added to the sale or rental price of housing. Because residential development cannot take place without the addition of adequate infrastructure, site improvement requirements are not a constraint to the development of housing in Placer County.

Summary Conclusion

The requirements for on- and off-site improvements are similar to those of many other communities across California, and as such do not represent an undue constraint on the development of affordable housing. Placer County does provide some flexibility in standards for affordable housing projects.

Open Space and Park Requirements

Open space and park requirements can decrease the affordability of housing by decreasing the amount of land available on a proposed site for constructing units. The Land Use Element of the County’s General Plan requires that open space be included within certain new developments. General Plan Policy 1.B.9 states that the County shall require all residential development to provide private or public open space.

The County requires new development to provide a minimum of five acres of improved parkland and five acres of passive recreation area or open space for every 1,000 new residents of the area covered by the development. Developers may meet the requirement through the dedication of land and/or payment of fees, in accordance with State law (Quimby Act) to ensure funding for the acquisition and development of public recreation facilities.

To fund the acquisition and maintenance of County parks and open space, the County charges a park fee to all development projects. As defined in “Placer County Parks and Recreational Facilities (QUIMBY) Fee” for the 2020/2021 fiscal year, the park fee is currently \$775 per resulting parcel on lands zoned to permit single-family residences, \$550 per dwelling unit on lands zoned for multifamily residential uses, and \$500 per dwelling unit on lands zoned for age-restricted senior uses. The fees are set and adjusted as necessary to provide for a level of funding that meets the actual cost to provide for all of the public parkland and park development needs generated by new development.

Conclusions

In conclusion, the requirements for open space and park facilities are similar to those of many other communities across California, and do not represent an undue constraint on the development of affordable housing. Placer County does provide some flexibility in standards for affordable housing projects.

Review of Local Ordinances

Inclusionary Housing

Approved in 2020, a minimum of 10 percent of units in residential projects that exceed 100 units are required to be affordable to moderate-, low-, and very-low-income households; for residential projects with 8 to 99 units, the owner is required to pay an affordable housing fee on all newly constructed market rate dwelling units. Placer County also adopted Ordinance 5816-B in 2016 that allows owners of accessory dwelling units who elect to deed-restrict those units for affordable housing to be exempt from payment of building permit fees.

In conclusion, Placer County’s inclusionary housing requirements in Specific Plan project areas and incentives for affordable accessory dwelling units do not represent an undue constraint on the development of affordable housing and result in the provision of more affordable housing than would otherwise be built.

Short-Term Rental

Approved in 2019, the County’s short-term rental ordinance is intended to create a balance of reducing issues related to vacation rentals without undermining the market for this important guest accommodation. There is some evidence to suggest that short-term rentals have the potential to limit the availability of rental housing, as owners of rental units may prefer to rent housing on a short-term basis for higher nightly rates rather than as long-term housing. This is particularly likely in areas with high demand for tourist accommodations. As such, the short-term rental ordinance also works to regulate short-term rentals and minimize the loss of the affordable housing stock.

The County does not have any other ordinances that could constrain the development of housing.

Density Bonus

A density bonus is the allocation of development rights that allows a parcel to accommodate additional square footage or additional residential units beyond its zoning district maximum. On January 1, 2005, SB 1818 (Chapter 928, Statutes of 2004) revised California’s density bonus law (Government Code Section 65915) by reducing the number of affordable units that a developer must provide in order to receive a density bonus. The legislation also increased the maximum density bonus to 35 percent. The minimum affordability requirements are as follows:

- The project is eligible for a 20 percent density bonus if at least 5 percent of the units are affordable to very-low-income households or 10 percent of the units are affordable to low-income households;
- The project is eligible to receive a 5 percent density bonus if 10 percent of for-purchase units are affordable to moderate-income households.

The law also established a sliding scale, which determines the additional density that a project can receive. A developer can receive the maximum density bonus of 35 percent when the project provides either 11 percent very-low-income units, 20 percent low-income units, or 40 percent moderate-income units. In 2005, SB 435 was passed, which clarified California’s density bonus law by explaining that a project can only receive one density bonus.

Prior to SB 1818 and SB 435, jurisdictions were required to grant one incentive, such as financial assistance or development standard reductions, to developers of affordable housing. The new laws require that cities and counties grant more incentives depending on the percentage of affordable units developed. Incentives include reductions in zoning standards, development standards, design requirements, and other reductions in costs for developers. Projects that satisfy the minimum affordable criteria for a density bonus are entitled to one incentive from the local government. Depending on the amount of affordable housing provided, the number of incentives can increase to a maximum of three incentives from the local government. If a project provides affordable units but uses less than 50 percent of the permitted density bonus, the local government is required to provide an additional incentive.

Additionally, the new laws provide density bonuses to projects that donate land for residential use. The donated land must satisfy all of the following requirements:

- The land must have general plan and zoning designations which allow the construction of very-low-income affordable units as a minimum of 10 percent of the units in the residential development;
- The land must be a minimum of one acre in size or large enough to allow development of at least 40 units;
- The land must be served by public facilities and infrastructure.

SB 1818 also imposes statewide parking standards that a jurisdiction must grant upon request from a developer of an affordable housing project that qualifies for a density bonus. When local parking requirements are

Table 52. Statewide Parking Standards for Affordable Housing, California, 2007

Number of Bedrooms	Number of On-Site Parking Spaces Required
0 to 1 bedroom	1
2 to 3 bedrooms	2
4 or more bedrooms	2½

Source: Goldfarb & Lipman, LLC., SB 1818 Q & A.

higher, the statewide parking standards supersede the local requirements. Developers may request these parking standards even if they do not request the density bonus. The new statewide parking standards for affordable housing are summarized in Table 52. These numbers are the total number of parking spaces, including guest parking and accessible parking.

Placer County Zoning Code Section 17.54.120 is consistent with State law requirements related to density bonus. The County offers a 20 percent density bonus to developers that provide either: 1) at least 10 percent of units for low-income households; or 2) at least 5 percent of units for very-low-income households. The County also offers a 5 percent density bonus to developers of a condominium project or planned unit development with at least 10 percent of units reserved as affordable to moderate-income households. The developer can decide to increase the percentage of affordable or senior units to receive a maximum 35 percent density bonus. Additionally, the County offers affordable housing developers up to three density bonus incentives, as required by State law. The County also offers density bonuses to projects that donate land for affordable housing and offers parking ratio reductions consistent with the statewide parking standards shown in Table 52.

Placer County’s Zoning Code Section 17.56.210 states that the County offers a 25 percent density bonus for housing projects that reserve at least 50 percent of residential units for senior households. A project is granted additional density bonuses based on certain criteria, including but not limited to affordability of units, meals served, distance to shopping centers, and distance to transportation services. A senior project can acquire a

maximum 250 percent density bonus depending on the criteria that it meets.

In conclusion, Placer County’s treatment of the density bonus provision does not represent a constraint on the production of affordable housing. The County’s density bonus ordinance is consistent with State law and promotes affordable housing by offering an incentive to developers who produce units affordable to seniors, very-low-, and low-income households.

State of California Constitution, Article 34

Article 34 of the State Constitution requires voter approval for specified “low rent” housing projects that involve certain types of public agency participation. Generally, a project is subject to Article 34 if more than 49 percent of its units will be rented to low-income persons. If a housing development project is subject to Article 34, it will require approval from the local electorate. This can constrain the production of affordable housing, since the process to seek ballot approval for affordable housing projects can be costly and time consuming, with no guarantee of success.

The provisions of Article 34 allow local jurisdictions to seek voter approval for “general authority” to develop low-income housing without identifying specific projects or sites. If the electorate approves general parameters for certain types of affordable housing development, the local jurisdiction will be able to move more quickly in response to housing opportunities that fall within those parameters.

Placer County has not built housing itself (it has only provided support for affordable housing projects seeking state or federal funding), so it has not needed Article 34 authorization. Most affordable housing projects are built by private developers, who seek financial assistance from the State and federal governments.

In conclusion, the lack of Article 34 authorization has not served as a constraint to the development of affordable housing in Placer County. By supporting the development of affordable housing by supporting funding applications made by private developers rather than directly developing low-income housing, the County has mitigated this potential constraint.

Development, Maintenance, and Improvement of Housing for Persons with Disabilities

In accordance with SB 520 (Chapter 671, Statutes of 2001), the County has analyzed the potential and actual governmental constraints on the development of housing for persons with disabilities. On an ongoing basis, the County reviews its zoning laws, policies, and practices to ensure compliance with fair housing laws. Placer County has adopted the 2019 California Building Code, including Title 24 regulations of the code concerning accessibility for persons with disabilities. The County has not adopted any additional universal design elements in its building code beyond Title 24 requirements.

In 2008, Placer County adopted Section 17.56.185 into the zoning ordinance to establish a formal procedure for persons with disabilities, who are seeking equal access to housing, to request reasonable accommodation in the application of the County's land use regulations. Persons with disabilities can request reasonable accommodation by submitting an application, which is reviewed by the Planning Director. If the request is made in conjunction with another discretionary approval, such as a use permit, the request is submitted and reviewed concurrently with the application for the discretionary approval. There is no application fee associated with the request for reasonable accommodation.

In conclusion, the reasonable accommodation ordinance allows certain deviations from development standards to accommodate accessibility improvements in existing structures. The ordinance demonstrates the County's efforts to remove governmental constraints to meeting housing needs for persons with disabilities.

Impediments to Affordable Housing Production in the Tahoe Region

Tahoe Regional Planning Agency (TRPA)

The TRPA was established in 1969 as a bi-state compact between California and Nevada and later approved by Congress to oversee development and protect the natural resources of the Tahoe Basin. TRPA's mission is to preserve, restore, and enhance the natural and human environment in the Lake Tahoe basin. TRPA updated its Regional Plan which was approved in December 2012 by the TRPA Governing Board. The Regional Plan is the long-term plan for the development of the Lake Tahoe region. In some cases, regulations that further the realization of TRPA's Regional Plan can preempt California and Nevada state law.

TRPA's code of ordinances establishes specific regulations and thresholds for, among other things, land use, density, rate of growth, land coverage, excavation, and scenic impacts. These regulations are designed to bring the Lake Tahoe region into conformance with the threshold standards established for water quality, air quality, soil conservation, wildlife habitat, vegetation, noise, recreation, and scenic resources. However, although these regulations serve to protect and enhance the Tahoe Basin, they create additional costs and requirements that can constrain development and housing production despite the great need for such housing. TRPA employs some measures to promote affordable housing in the basin, but many of the environmental regulations limit the feasibility of affordable housing projects for lower-income and moderate-income residents.

The 2012 Regional Plan identifies the provision of a variety of housing choices around the Tahoe Basin as a top priority. Placer County staff provided regular feedback and proposed modifications to the Regional Plan Update to address areas of inconsistency related to land use/zoning district designations and development standards.

Placer County also worked with TRPA to ensure that accessory dwelling units would be permitted on parcels greater than one acre in size and on parcels located in a community with a local government housing program certified by TRPA. This is codified in Section 21.3.2.A.2 of the TRPA Code of Ordinances. Any accessory dwelling units on such parcels are to be deed-restricted units, as is allowed in the City of South Lake Tahoe.

Zoning

Under the previous regional plan, plan area statements and community plans were the equivalents in TRPA regulations of general plan land use designations and zoning districts. Each parcel of land in the region was assigned to a plan area statement (PAS) or community plan (CP) district. Each of these documents defined the “permissible uses” for the given area. The PAS used “flexible zoning” that often allows a variety of residential uses without requiring rezoning. At the time of the 5th-cycle housing element update, there were 54 PAS and CP areas in the Tahoe Basin portion of Placer County.

Placer County updated its Tahoe Basin Community Plans in 2017 to be consistent with the 2012 Regional Plan Update. Community plans replace the plan area statements for the areas within the community plan boundaries, but are required to retain certain features of the plan area statements in the regional plan.

In Placer County, all PAS districts were replaced and superseded by area plan subdistricts and overlay districts to create a more efficient planning system that integrated TRPA requirements into the plans and permits of other government agencies.

TRPA’s policies create incentives for restoration of sensitive lands and increase the feasibility of “environmental redevelopment.” The Regional Plan update eliminated regulatory barriers to redevelopment of rundown buildings.

In conclusion, TRPA’s Regional Plan’s zoning regulations provide for a wide variety of mixed-use subdistricts, which should help increase the amount of affordable housing in the plan area. The plan’s zoning regulations appear to be similar to the County’s regulations and do not impose any burdensome requirements that would constrain the development of more affordable housing.

Land Coverage Limitations

Paved areas like roads, parking lots, and building (i.e., impervious surfaces) negatively impact water quality in Lake Tahoe. TRPA created rules for land coverage because of the potential damage to the lake’s world-famous clarity.

There are two systems that regulate land coverage in the Tahoe Basin. The Bailey Land Capability Classification System, in place since 1971, regulates land coverage for all uses except single-family housing development. Single-family housing falls under the individual parcel evaluation system (IPES), which was adopted by TRPA under the 1987 Regional Plan.

The Bailey classification system uses a land development capability scoring system that ranges from 1 to 7. Low-capability scores (less suitable for development) range between 1 and 3, and high-capability scores (more suitable for development) range between 4 and 7. The IPES system, used only for vacant residential parcels, uses a land development capability scoring system that ranges between 0 and 1,200, with scores under 726 considered low capability and above 726 considered high capability. Landowners are permitted to cover between one percent and 30 percent of a parcel’s surface with “base coverage” (structures and parking), depending on the Bailey classification or IPES score.

In addition to the “base coverage,” owners can transfer additional units of land coverage up to a specific maximum based on the parcel size. This transferred land coverage is purchased either privately or from a

land bank in accordance with hydrologic transfer area restrictions. These rules enable coverage to be moved around within a subwatershed, but remain within the cap that was created to protect Lake Tahoe.

In a 1987 settlement agreement, TRPA agreed to lower the IPES line from 726 to 1, subject to a number of environmental “safeguards.” These safeguards include requirements to install a water quality monitoring program and retirement of environmentally sensitive parcels. Since 2008, every jurisdiction in the Tahoe Basin, with the exception of Placer County, has had its IPES line reduced to 1. The stagnation of the IPES line at 726 in Placer County limits the land available for residential development.

The 2012 Regional Plan update modified the TRPA’s land coverage regulations to promote the redevelopment of older buildings and improvements to lake clarity. It encourages land coverage to be relocated to town centers, where greater density, walkability, and links to transit are planned. TRPA allows excess coverage to be removed and converted to development rights, and also allow coverage to be regulated at a neighborhood scale rather than parcel-by-parcel if overall coverage and coverage on sensitive lands are reduced.

In conclusion, land coverage limitations often pose a constraint to the achievement of maximum residential density for multifamily uses, but changes in the Regional Plan will help facilitate higher-density development in the Tahoe Basin. The stagnation of the IPES line at 726 in Placer County limits the land available for residential development and is a constraint on the production of housing in the Tahoe Basin portion of the County.

Density Limitations

The maximum permissible density for multifamily housing in most of the Tahoe Basin is currently 15 units per acre. However, Town Centers in the Tahoe Basin have a maximum permissible density of 25 units per acre for multifamily housing. Affordable housing is allowed a 25 percent density bonus (which would allow up to 18.75 units per acre) when two specific findings can be made: 1) the project at the increased density satisfies a demonstrated need for additional affordable housing;

and 2) the additional density is consistent with the surrounding area. Any future proposed higher densities would require an amendment to the Regional Plan.

In conclusion, density limits can be a constraint to the production of affordable housing in the Tahoe Basin. Developers of affordable housing often require higher densities to make a project financially feasible. Although density bonuses are available to some affordable housing developments, maximum densities are often not achievable due to other site limitations such as land coverage limitations, height restrictions, and setbacks.

Affordable Housing Incentives

Local Efforts to Remove Barriers

Placer County continues to work with TRPA to modify policies that are negatively impacting the creation of affordable housing, such as restrictions on the construction of accessory dwelling units. In the 2012 Regional Plan, Policy HS-3.1 states:

TRPA shall regularly review its policies and regulations to remove identified barriers preventing the construction of necessary affordable housing in the region. TRPA staff will work with local jurisdictions to address issues including, but not limited to, workforce and moderate-income housing, secondary residential units and long-term residency in motel units in accordance with the timeline outlined in the Implementation Element.

Policy C-2 of the Placer County General Plan requires new commercial development to also provide housing to 50 percent of the full-time equivalent employees that the development will generate. Housing may either be provided through on-site or off-site construction, land dedication, or payment of an in-lieu fee. Placer County will continue to implement the employee housing requirements established on new commercial developments in the Tahoe Basin.

Potential Nongovernmental Constraints

The availability and cost of housing is strongly influenced by market forces over which local governments have little or no control. Nonetheless, State law requires the housing element to contain a general assessment of these constraints, which can serve as the basis for actions to offset their effects. The primary nongovernmental constraints to the development of new housing in Placer County can be divided into the following three categories: availability of financing, development costs, and community sentiment.

Availability of Financing

For credit-worthy projects, residential construction loan rates are currently (2020) between 11 to 25 percent, depending on the approver of the loan. However, since interest rates reflect deliberate monetary policy by the Federal Reserve Board, it is not possible to forecast what will happen to interest rates during the upcoming housing element planning period. If interest rates rise, not only will it make new construction more costly (since construction period loans are short term and bear a higher interest rate than amortized mortgages), but it will also lower the sales price that buyers can afford to pay.

At the time of this housing element's preparation (April 10, 2020), mortgage interest rates were historically low.¹

■ Conforming and Government Loans

- 30-year Fixed Rate: 3.125% Interest Rate and 3.206% APR
- 20-year Fixed Rate: 3.125% Interest Rate and 3.197% APR
- 15-year Fixed Rate: 2.500% Interest Rate and 2.645% APR

■ Jumbo Loans

- 30-year Fixed Rate: 3.500% Interest Rate and 3.504% APR
- 15-year Fixed Rate: 3.250% Interest Rate and 3.250% APR
- 10/1 Adjustable Rate Mortgage Jumbo: 3.000% Interest Rate and 3.122% APR

Comparatively, the average 30-year fixed rate in 2019 was 4.25 percent and at its lowest was 3.63 percent. This lowest rate from 2019 was still higher than the current 30-year rate of 3.125 percent as reported. This drop in interest rates is likely due to the unforeseen COVID-19 pandemic. The associated lockdown orders from the Governor and social distancing guidance from the federal government have caused economic impacts across industries, including the finance and housing market. This makes it easier for households to finance house purchases. It is likely, however, that rates will increase once again to previous levels when the pandemic restrictions are lifted, allowing economic activity to return to normal. Still, rates are not likely to significantly increase given that the average interest rate has fluctuated very little from 3 to 4 percent since 2012.

Development Costs

Land Costs

Costs associated with the acquisition of land include both the market price of raw land and the cost of holding the property throughout the development process. Land acquisition costs can account for over half of the final sales price of new homes in very small developments and in areas where land is scarce. Vacant, undeveloped land costs vary substantially across Placer County depending on the community and location. Generally, vacant land costs are lower toward the Greater Sacramento area on the County's western end compared to land costs in the Tahoe Basin on the County's eastern end. For unincorporated Placer County, the average cost of vacant land parcels was \$243,512, and the average cost per acre was \$532,413. For the western unincorporated County, the average cost of vacant land parcels was \$264,048, and the average cost per

1 <https://www.wellsfargorelo.com/relo/todaysRates.page?suffix=yourcompany1096>

acre was \$222,062.² For the Tahoe Basin, the average cost of vacant parcels was \$298,271, and the average cost per acre was \$1,224,459.^{3, 4}

Construction Costs

Construction costs vary widely depending on the type, size, and amenities of the development. According to Placer County Building Services Division of the Community Development Resource Agency, the average single-family construction costs in Placer County in 2020 are \$118 to \$163 per square foot, depending on the size of the home and/or its elevation above sea level. Generally, housing units below 5,000 feet in elevation are less costly to build than homes at or above 5,000 feet due to the additional construction requirements, as mentioned in the *Building Codes and Enforcement* section of this element.

In the Tahoe Basin area of Placer County, construction costs are somewhat greater. A 2018 housing development study prepared for TRPA determined that construction costs range between \$229 per square foot for both rental and owner-occupied single-family construction and about \$301 or \$302 per square foot, respectively, for rental and owner-occupied multi-family construction. This suggests that single-family construction is less expensive to build than multifamily housing; however, the total cost estimates show that, overall, multifamily housing is far more affordable to construct. For instance, a 45-unit rental multifamily housing project and a for-sale multifamily housing project cost \$260,490 and \$261,294 to construct per unit, respectively. Comparatively, a single-family home—for rent or for sale—costs an estimated \$549,791 to build. This discrepancy originates from the large footprint of single-family homes in the Tahoe Basin—since 2010 the median size of new single-family construction has

typically been about 2,500 square feet. This results in a per-square-foot cost estimate that is seemingly more affordable than multifamily construction, but nearly twice as expensive when accounting for the entire structure.

High construction costs coupled with high land costs make it difficult for private-sector developers to provide housing for lower-income residents. Subsidies, incentives, and other types of financial assistance are available to private-sector developers to bridge the gap between actual costs of development and the sale price of affordable housing.

Total Housing Development Costs

As shown in Table 53, the total of all housing development costs discussed above for a typical entry-level single-family home (1,500 square feet) in the unincorporated County is roughly \$247,783 for single-family homes in the Western/Central areas of the County and \$537,062 for homes in the Eastern area of the County, including site improvements, construction costs, and fees and permits. As shown in Table 54, these per-unit development costs for multi-family housing are \$217,071 in the Western and Central parts of the County and \$344,025 in the Eastern part of the County.

2 Western unincorporated County in this analysis includes: Applegate, Bowman, Meadow Vista, Newcastle, Penryn, Sheridan, and Weimar.

3 Tahoe Basin in this analysis includes: Alpine Meadows, Carnelian Bay, Homewood, Kings Beach, Olympic Valley, Tahoe City, and Tahoe Vista.

4 Cost estimates come from an online survey performed on April 10, 2020, of vacant parcel listings on Zillow sold within the last two years though most were sold between three months to a year ago. The three most recently sold parcels were surveyed for the unincorporated Placer County communities listed in footnotes 16 and 17, for a total of 60 parcels representing the entire unincorporated County.

**Table 53. Estimated Single-Family Housing Development Costs
Placer County, 2019**

Type of Cost	Amount
Land Costs (one acre)	\$532,413
Total Housing Development Costs, per Unit, Western/Central County	\$247,783
Total Housing Development Costs, per Unit, Eastern County	\$537,062

Source: Placer County and Placer County Affordable Housing Funding and Investment Strategy, 2019.

**Table 54. Estimated Multifamily Housing Development Costs
Placer County, 2019**

Type of Cost	Amount
Land Costs	\$532,413
Total Housing Development Costs, per Unit, Western/Central County	\$217,071
Total Housing Development Costs, per Unit, Eastern County	\$344,025

Source: Placer County and Placer County Affordable Housing Funding and Investment Strategy, 2019.

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