



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

MEMORANDUM

TO: Honorable Board of Supervisors

FROM: Michael J. Johnson, AICP
CDRA Director

DATE: May 18, 2010

SUBJECT: Tahoe Regional Planning Agency - Regional Plan Update Status

ACTION REQUESTED:

The Planning Department and County Executive Office are providing the Board with an update on the TRPA Regional Plan Update. No Board action is requested at this time.

BACKGROUND:

The Tahoe Regional Planning Agency (TRPA) is in the process of updating its Regional Plan and making minor revisions to existing Environmental Threshold Carrying Capacities (Thresholds). The threshold changes are made in an effort to incorporate updated science and changes in law, such as addressing climate change relative to the Region's carbon footprint, and address the risk of catastrophic wildfire. The Regional Plan provides an overview of land use, conservation, restoration, forest health, wildlife management, air quality, and related goals and policies and implementation strategies that, when combined, are designed to accelerate threshold attainment over the next 20 years.

The Regional Plan contains Goals and Policies, and these support Implementation Measures. The aim of the draft documents is to assist stakeholders in the review of the list of proposed changes and to understand how each measure could be affected in each alternative scenario. These Element and Sub-Element documents are descriptive narratives broken down by each sub-element of the plan.

Regional Plan Update Elements

1. LAND USE ELEMENT

- Land Use Sub-element
- Housing Sub-element
- Noise Sub-element
- Natural Hazards Sub-element
- Air Quality Sub-element
- Water Quality Sub-element
- Community Design

2. TRANSPORTATION ELEMENT

3. CONSERVATION ELEMENT

- Vegetation Sub-element
- Wildlife and Fisheries Sub-element
- Soil Conservation Sub-element
- Shorezone Sub-element
- Scenic Sub-element
- Open Space Sub-element
- Stream Environment Zone (SEZ) Sub-element
- Cultural Resources Sub-element
- Energy and Climate Change Sub-element

4. RECREATION ELEMENT

Dispersed Recreation Sub-element
Developed Recreation Sub-element
Urban Recreation Sub-element
General Recreation Sub-element
Recreation Education Sub-element

5. PUBLIC SERVICES AND FACILITIES ELEMENT

6. IMPLEMENTATION ELEMENT

Institutional Partnerships Sub-element
Performance Review and Implementation Scheduling Sub-element
Environmental Improvement Sub-element
Education and Outreach Sub-element
Monitoring and Evaluation Sub-element

Alternatives

TRPA has drafted four different Regional Plan scenarios, called Alternatives, for analysis in the Environmental Impact Statement. The alternatives provide a way of projecting and comparing the outcomes of different styles of management:

1. *Alternative One* is the "no project" alternative. Under this alternative no changes would be made except what is necessary to keep up with the regulations of other federal or state agencies.
2. *Alternative Two*, the alternative proposed by TRPA staff, focuses on a combination of incentives, regulation, and collaboration to achieve the environmental thresholds required by the Compact.
3. *Alternative Three* is largely like the "no project" Alternative One, except that it allows for development to continue at a pace very similar to the one we have seen over the past 20 years.
4. *Alternative Four* takes the approach that a decreased amount of allocations and an increased amount of regulation is the best way to ensure that the Thresholds are attained.

The Regional Plan Update alternatives contain a broad range of policies, regulations, supporting scientific rationale and a complete environmental analysis will ultimately be presented to the TRPA Advisory Planning Commission and Governing Board for public hearings, deliberation and action on certification of the Environmental Impact Statement and adoption of the updated Thresholds and Regional Plan.

CURRENT STATUS

TRPA has conducted stakeholder meetings with local jurisdictions and interested parties who have provided input as various sub-elements of the Regional Plan. Comments and suggestions are considered by the TRPA Advisory Planning Commission and finally, agreed upon suggestions are presented to the TRPA Governing Board for action and direction to TRPA staff.

The first Milestone meeting was held on January 10, 2010 and specifically considered the Water Quality and Stream Environment Zones sub-elements of the Regional Plan.

The second Milestone meeting was held on February 24, 2010 and specifically considered the Public Lands, Resource Management and Recreation sub-elements of the Regional Plan.

To ensure that County concerns are properly addressed in the Regional Plan, County staff participates in the many stakeholder meetings, the TRPA Advisory Planning Commission Hearings, and the TRPA Governing Board hearings. Attached for your information and review are copies of the two most recent comment letters to the TRPA regarding the proposed Transect Maps and Allowable Land Use Tables (dated March 10, 2010) and the proposed Air Quality Element (dated March 24, 2010). Currently, staff is coordinating comments regarding

the proposed Transportation, Noise and Climate Change sub-elements and expects to submit those comments later this month.

In summary, this status update is intended to generate discussion and feedback from your Board as well as to seek your concurrence that County staff is implementing your Board's direction thus far in providing comments on the Regional Plan.

Respectfully submitted,



MICHAEL J. JOHNSON, AICP
Director of Planning

Attached to this report for the Board's information/consideration are:

ATTACHMENTS:

- Attachment 1: March 10, 2010 letter. Placer County Comments on Transect Maps and Allowable Land Use Tables
- Attachment 2: March 24, 2010 letter. Placer County Comments on the Air Quality Element

cc: Tom Miller, County Executive Officer
Jennifer Merchant, Tahoe County Executive Office
Scott Finley, County Counsel's Office
Loren Clark, Assistant Planning Director
Wes Zicker, Engineering and Surveying Director
Paul Thompson, Deputy Planning Director
Steve Buelna, Supervising Planner
Ken Grehm, Department of Public Works Director
Peter Kraatz, Deputy Public Works Director
Jim Lobue, Redevelopment Deputy Director
Rae James, Redevelopment Agency
Mary Dietrich, Deputy Facility Services Director
Nick Trifiro, Associate Planner



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

March 10, 2010

Mr. John Hitchcock
Regional Plan Update Team Lead
Tahoe Regional Planning Agency
PO Box 5300
Stateline, NV 89449

SUBJECT: TRPA Regional Plan Update
Placer County Comments on Transect Maps and Allowable Land Use Tables

Dear Mr. Hitchcock:

Thank you for providing Placer County the opportunity to review the TRPA Draft Regional Plan Update Alternatives and Transect Maps and Allowed Uses. For your convenience, comments from various County Departments including Planning, Facility Services, Redevelopment Agency, and the County Executive Office are included in this letter and conveniently organized by commenting department.

Following are comments provided by the Placer County Planning Department:

It can be confusing to have so many uses listed in each transect. The County suggests removing uses that are not allowed in either the transects or the Plan Area Statements to facilitate an easier review. This may also allow for larger font size making the document easier to read. A clear identification of where the changes to the existing zoning would also be helpful.

Existing densities are not listed when the proposed Transect densities are. Is there a reason for this exclusion? Additionally, a number of instances suggest activities be performed without indicating the responsible party. This information would be helpful to determine the impact of this plan on Placer County. The County also suggests that PAS 031, or the new equivalent transect, recognize Multi-Family as an allowed use, making this transect consistent with Placer County.

Homewood Tahoe Ski Bowl

There is reference to the need for a new Community Plan for any new or additional commercial uses. How would this impact the proposal for Homewood Mountain Resort?

Blackwood

A policy is suggested that "Blackwood Creek should be stabilized and other instream programs to minimize erosion and scouring should be performed." Who would be performing this?

The statement is made that snowmobile use should be prohibited in important wildlife habitat. Where is this habitat identified? How will the public be informed of this? Who will enforce this?

It appears that the current zoning for Blackwood allows pipelines and transmission with the approval of a use permit. The proposed zoning does not allow this in certain transects. The Planning Department suggests the more appropriate approach would be to leave this as allowed with a use permit in areas where there is a question, and allow it to be determined during the public hearing process.

It is confusing to have T4 included in this chart when there is no indication on the map of the presence of T4 zoning. At the same time, T5 is clearly shown on the map, yet there is not a category for it within the chart.

Alpine Ski (new)

The policy seeks to prohibit base facilities. Are there base facilities proposed currently? What is the rationale behind this prohibition? Would it be more appropriate to leave it as a possibility that could be considered in a Conditional Use Permit, since this is a 20 year plan?

There is a note about no new parking facilities. Alpine Peaks HOA recently had a discussion before NTRAC about parking and there was discussion about providing more public spaces so they could enforce no parking.

Alpine Ski (new)

Downhill Ski Facilities indicates the need for a use permit. It should be noted that Placer County requires a Conditional Use Permit for all ski lifts and ski runs.

This seems a bit confusing. T4 is the only transect that appears in the allowed use column, yet it does not appear on the map. It is unclear how the map and the table relate to one another.

Lower Ward Valley

The T3 transect requires a use permit for single family dwellings. The areas identified on the map as T3 are largely existing developed single family dwelling parcels. It seems inappropriate to create a new transect that does not recognize the existing character of an entire area.

Placer County Westshore LDR

Who would be offering the buyout program for Alpine Peaks lots? And is this seen as a viable program? How would this impact the County should the IPES line be dropped to 0 as is the case in every other jurisdiction.

There is discussion of lack of services to Alpine Peaks, specifically fire protection and TCPUD. There are homes there now, how are they served? Have NTFPD or TCPUD commented on suggesting that due to their limitations, owners should retire their development potential in these areas?

Is TRPA referring to transfer of vacant land development rights out of the Mark Twain Tract?

What does S(1-8) mean?

Why are there 3 columns for T5? It appears there is a special area 1. How is this defined, where is it located? It does not appear to be delineated on the map. Without this knowledge it is impossible to comment on whether the proposed changes are appropriate.

Domestic Animal Raising

Placer County is requesting that TRPA revise the definition of "Domestic Animal Raising" to permit the raising and keeping of chicken hens within single family residential districts as part of the Regional Planning Update. Placer County is currently processing a Zoning Text Amendment to allow the raising and keeping of up to three chicken hens primarily within the County's smaller lot size residential zone districts (Chickens are currently permitted within the larger lot zone districts). The keeping of roosters and other types of poultry hens (Guinea, pea, etc...) is prohibited. The County is preparing the Zoning Text Amendment in response to a rapidly growing movement to provide locally raised and grown foods. The County's proposed Zoning Text Amendment has generated an inordinate amount of interest by the public. Placer County highly recommends that TRPA revise the definition of "Domestic Animal Raising" to allow the raising and keeping of chicken hens in the upcoming Regional Planning Update so that TRPA is adequately prepared to address what may become an on-going issue in the future.

Cellular Communications Installations

Cellular installations within portions of Placer County that are also located within the Lake Tahoe Basin are discretionary to the joint authorities of the County and to the Tahoe Regional Planning Agency (TRPA). To that end, the County, through adoption of General Plan and Community Plan documents for Placer County communities located within the Lake Tahoe Basin, has established land use criteria and zoning regulations that conform to land use criteria included in Chapter 18 of the TRPA Code.

Presently, cellular communications installations (Transmission and Receiving Facilities land use) are allowed within all General Plan and Community Plan Area Statements (PAS) within the Placer County portion of the Lake Tahoe Basin with the exception of properties located within the following Plan Area Statements of the West Shore Area General Plan:

- PAS 003 (Lower Truckee - Special Area #1)
- PAS 159, Special Areas 1, 2, and 3 (159 - Homewood/Commercial)
- PAS 160, Special Areas 1, 2, 3, and 4 (160 - Homewood/Residential)
- PAS 166 (Upper Ward Valley)

Additional considerations and restrictions may exist due to the specific policies of each PAS and/or due to location within or proximity to the Lake Tahoe Shorezone. Documents reviewed in reference to the information above include the following:

- West Shore Area General Plan
- Tahoe City Community Plan
- North Tahoe Community Plan, Including:
 - Carnelian Bay
 - Kings Beach
 - Kings Beach Industrial
 - Tahoe Vista
 - North Stateline
 - North Tahoe Area General Plan

Deployment of New Facilities within the Tahoe Basin

The TRPA has recently advised that it may further restrict development of cellular communications sites (Transmission and Receiving Facilities) within certain land use districts within the Basin, such as residential areas and along scenic roadway areas. Placer County currently has no policies to preclude development of cellular facilities in zoning designations or plan areas where they are permitted. However, County staff does work closely with project applicants to provide guidance on the appropriateness of proposed cellular installation locations.

To this end, staff actively encourages cellular representatives to make efficient use of existing communications sites and utility infrastructure, to propose new locations (when necessary) that are sensitive to overall development patterns and land uses, to encourage location of new communication sites within designated commercial and industrial areas, and on properties developed with public safety facilities or public utility facilities. Due to the largely rural character of Placer County, there are significant portions of the County where there are not opportunities to locate new facilities as described above. Therefore County Ordinance does permit these facilities within all zoning districts and nearly all Plan Area Statements subject to approval of a Minor Use Permit or Administrative Approval depending on the type of installation proposed.

When such facilities are proposed in residential areas or in other rural zone districts, staff requires demonstration that the facility would not be disruptive to overall land use patterns and that the facility would not result in considerable impacts to neighboring property owners. Typically, rural residential areas are more conducive to placement of new facilities due to larger parcel sizes while areas with smaller parcels and higher population densities are less conducive. However, areas with smaller parcels and higher population densities are typically located within close proximity to commercial areas, public safety and public utility facilities, and/or transit corridors where alternative siting opportunities may exist.

Effect of Regulation By Local Agency

According to our discussion, the TRPA has expressed a desire to implement regulatory structures relative to requests for approval of new telecommunications facilities on the basis

of perceived health affects related to radio frequency emissions commonly referred to as EMF's. The 1996 Telecommunications Act prohibits State or local agencies from regulating on the basis of EMF's. Section 704 (Facilities Siting; Radio Frequency Emission Standards) of the bill reads, in part, "No State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's (emphasis added) regulations concerning such emissions." Although local agencies cannot regulate the placement of installations on the basis of EMF's, the Act does not preclude State or local agencies from regulating the land use itself, including prohibition of the land use within any zone district so long as the use is not outright prohibited throughout the jurisdiction.

Wayfinding Signage

As you are aware, the County, TRPA, and a number of other government agencies have been meeting with the North Lake Tahoe Resort Association over the past couple years to address their concept of Wayfinding Signage. The current Sign Ordinance does not provide an allowance for this type of signage. If at all feasible, the Regional Plan Update should provide a mechanism to include this concept within sign regulations for the Lake Tahoe Basin.

Following are comments provided by the Placer County Department of Facility Services:

The focus of our review is to determine impacts to land use regulations that affect activities for services that County government provides in the Tahoe Basin. Additionally, since the Department of Facility Services is also responsible for managing County-owned properties in the Basin, this review included evaluation of changes that would affect the development potential of County-owned properties.

The following comments on this memorandum include observations that globally apply to a number of the Transect areas in the Regional Plan. We have also separately attached comments that apply specifically to the individual Transect areas (Attachment 2). On these sheets we have identified County-owned or leased properties and have provided comments where stated policies or land use changes may affect County's ability to provide services.

Facility Services appreciates the opportunity to comment on the Regional Plan Update and is available to discuss our comments at your convenience.

Facility Services - Property Management

In reviewing the draft TRPA Regional Plan, we observed an inconsistent approach in articulating policies. At times, the policies were appropriately broad as would be expected in a plan of this type. However, there are numerous instances where the policy statements are site-specific and seemingly more appropriate for a community plan or for project level review (E.g. Kings Beach HDR – Policy 7A).

The basis and intent of some policy statements in the draft TRPA Regional Plan are not substantiated (E.g., North Tahoe Recreational Area - Policy 24A.2). In these circumstances, additional clarification would be beneficial.

Some policies call for changes that could possibly have implications for other jurisdictional agencies. Further outreach and consultation with other public agencies in the Tahoe region may be necessary before these policies are moved forward (E.g., Homewood Marina – Policy 4).

The nature of agency approvals (administrative approval or approval with minor use permit/conditional use permit) for many uses has changed. Where revitalization of a specific community such as Kings Beach is a goal, agency approvals should be as administrative as possible. This would also apply in Tahoe City where maintenance of the community's vitality is key.

Given the importance of providing adequate levels of public service for Placer County residents throughout the Tahoe region, it is appropriate to allow Government Office uses with an administrative approval rather than being subject to the special use permit process. Professional Office and Government Office are designated as two separate land use categories. In most Transect areas, Professional Office uses are permitted administratively. However, Professional Office and Government Office provide for functionally identical uses, and the parking requirements are the same for both. Facility Services strongly recommends that the Governmental Office use be combined with Professional Office, requiring only administrative approval. As an option, allowing Governmental Office uses administratively would be an acceptable alternative.

In a number of the TRPA transect matrices, the labeling for the transect zones did not match the transect zones map legends (E.g. Tahoe Vista CP, Tahoe City Town Center CP). Once these inconsistencies are corrected, additional review may be required.

Tahoe City is an important community center for the delivery of services to residents. We were unable to complete the review of the Tahoe City Town Center Transect area because the labeling and Transect areas do not match. Similarly, Kings Beach is also an area of opportunity for County service delivery. However, no information on this commercial area was provided in the review package. Consequently, Facility Services would like to reserve an opportunity to provide additional comments when clarifications are provided.

Facility Services - Parks

Placer County and other recreation providers have established their own policies according to the interests of their respective constituents. While they share common interests, each entity has unique goals and policies. This plan should not create new obligations of recreation providers without their full participation and input and should not create new funding priorities or requirements.

Because of overlapping responsibilities and interests, a stakeholder group of various public interest holders should be convened prior to addressing public shore zone access policies

described in this document. Isolated comments about public ownership status and rights should be avoided without closer analysis (E.g., Carnelian Bay LDR – Policies 1A and 4A).

It is unclear how the trail plans of the various local Community Plans and the TRPA regional bikeway plan will be incorporated into the Regional Plan Update. Following further clarification, the County would like an opportunity to provide further comment.

In some transect zones riding and hiking trails are precluded or require Special Use Permits. Is this consistent with the TRPA Bicycle and Pedestrian Master Plan that is currently being updated? Requiring Special Use Permits for trails involves a more onerous process and may discourage the development of trail linkages important to the Tahoe Basin (E.g., Granlibakken, Tahoe Vista CP).

Following are comments provided by the Placer County Redevelopment Agency:

The Placer County Redevelopment Agency has a strong interest in the future redevelopment of properties within its North Lake Tahoe Redevelopment Project Area boundaries. The County supports redevelopment activities that accomplish the simultaneous goals of protecting the natural environment, improving substandard housing conditions, upgrading deficient infrastructure, revitalizing the local economy and improving the quality of life for local residents, workers and visitors. The Placer County Redevelopment Agency has invested significant resources to pursue these simultaneous goals by targeting investment and redevelopment project efforts in strategic locations that are considered best placed to provide the greatest overall community benefit. In most cases, the proper land use designations and allowances are critical for the feasibility of implementing these proposed projects. In light of the foregoing, the following comments reflect proposed modifications to the draft materials reviewed and update the February 9, 2009 comments on a previous set of draft transect maps and allowed uses tables.

Alternative 2 is RDA's preferred alternative. However, without maps at a resolution that indicates the boundaries for transects and plan area statements, it is difficult to give final comments. It is my understanding that TRPA is working the County GIS management to provide copies.

Alternative 2 & 4

The Tahoe City Golf Course, the Gateway location (lower Truckee River), the landfill site north of Tahoe City and Lake Forest center, are important to the 20-yr work program for the Redevelopment Agency. They are all currently labeled 'special areas' and these designations by default have created a roadblock to environmental or economic improvement. All three sites suffer from a lack of BMPs, and due to current code language economic incentives to correct environmental challenges and/or sensitive land rehabilitation are non-existent.

Provisions for addressing these unique sites should be explicit in the Regional Plan Update. It is our understanding that if Chapter 15 is amended under the updated Regional Plan, those redevelopment areas would be entitled to incentives outside (or inside) current

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community plan areas—in the event Placer County has not updated its community plan areas.

A Housing Obligation Policy provision should be addressed in Alternative 2 and 4 to allow developers to bank or credit constructed affordable housing units that can later be sold to other developers in order to satisfy a housing obligation.

How are timeshares treated in the update? How are fractionals to be dealt with in the discussion of TAUs vs. subdivided units?

Provisions should be included that make government facilities an allowed use if located in an appropriate transect area.

Alternative 4

Alternative 4's constrained development is counter to TRPA's exposed public policies of sustainable development. Through its creation of new burdensome code requirements, it defacto makes development economically infeasible and places local jurisdictions in financial jeopardy.

The measure to require Class I bike trails on both sides of a street in a redevelopment area is not only cost prohibitive to sustainable development, it is not physically feasible++ in most redevelopment communities in North Lake Tahoe.

Following are comments provided by the Placer County Executive Office:

Land Use Comments

Page 33, Subdivisions. This policy prohibits projects that are consistent with TRPA goals and must be changed/clarified, especially in regard to mixed use development. The two step process is not consistent with current California building code.

Table LU-2 on Page 34 is not readable.

Alternative 2

Buzz words and terms such as Pedestrian Transit Oriented Development, promote and provide don't have a lot of meaning without some more detailed definition. The alternatives section is not complete without this.

Community Plan areas should be shown on the west shore, including Sunnyside, Homewood and Tahoma, where, as defined by the document, "infrastructure capacity and facilities exist." It is not appropriate that even the most intensely developed alternative does not provide for/acknowledge development in existing West Shore communities. This must be changed, as it will also result in zero to minimal environmental improvements here.

The document must provide transect district information for Placer County. The hugely sized transect document (18 pages printed and taped together) is confusing in intent and lacks

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detail. This type of documentation should also be provided to local jurisdictions via hard copy, not only electronic file.

The accompanying maps are unmarked segments of the basin and impossible to identify.

District definitions- Why are residential structures limited to one to two stories, if height allowance is 38 feet, which would accommodate three stories? Also, can't really assess agreement without comparative maps.

Disagree with statement on page 46 that "incentives and allocations proposed in Alternative 2 would not be available until an area's CP is either adopted or updated consistent with the updated Regional Plan." This process could take 5-10 years. Placer County has for nearly a year requested TRPA to review and discuss with Placer County what happens when RP is inconsistent with County/TRPA CPs. If this is a response to that question, this is not acceptable.

Minimum density of 8 units/acre is not high enough to incentivise ped/transt oriented development. LEED minimum is at least twice as high. This will not result in the envisioned PTOD TRPA seems to be promoting in Alternative 2.

Concern re: requirement of site specific soil survey—for every project??? Needs clarification.

Clarify statement on Page 49 that "allocation of additional CFA and TAU quantities would depend on reuse and conversion of existing development." This process needs to be fully developed so that we can provide input.

Jurisdictions should be allowed to retain any and all residential allocations "earned" through investments in EIP implementation.

Do not agree with "deed-restricted, owner-occupied" concept as explained on Page 50. This is not likely to yield the type of development being envisioned.

Alternative 4

It is not acceptable that this alternative does not include Tahoe City. What is the logic behind this decision?

On Page 55, why is it proposed that the USFS would increase its acquisition of residential lands? What benefit does this have to the long-term health of the basin? It is also unclear whether this is a funded USFS priority, and therefore even possible.

Please explain how exclusion of PTOD in all areas north of the south "wye" and west of north Stateline will help TRPA attain its environmental goals. This excludes some of the most densely populated and developed portions of the basin from Tahoma to Tahoe City to Carnelian Bay to Tahoe Vista and seems ill-advised.

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If reduced residential allocations were implemented it would be unfair to Placer County, which has developed fewer units than other jurisdictions.

Housing Subelement

"Encouraging" local jurisdictions to provide their "fair share" of affordable housing is not acceptable without more definition and process. We can comment further when this has been more fully defined.

Is fulltime residents defined anywhere? Does this include seasonal residents?

Conclusion

Knowing the commitment that TRPA has made to assuring the success of the Regional Plan, the County comments above reflect the County's commitment to assisting TRPA in preparing a Regional Plan that is complete, accurate and, most importantly, implementable. Placer County remains committed in achieving the overall goal of protecting Lake Tahoe and its surrounding environment while sustaining the vitality and well-being of the various Placer County communities and citizens who reside nearby.

Should you have any questions regarding the information in this letter, please do not hesitate to call me at (530) 745-3044. I look forward to working together with you and your team on the successful completion of the Regional Plan Update.

Sincerely,



PAUL THOMPSON
Deputy Planning Director
Placer County Planning Department

ATTACHMENTS

Attachment 1: TRPA Plan Review Spreadsheet containing Comments from the Department of Facility Services

cc. Jennifer Merchant, Tahoe County Executive Office
Scott Finley, County Counsel's Office
Loren Clark, Assistant Planning Director
Wes Zicker, Engineering and Surveying Director
Paul Thompson, Deputy Planning Director
Steve Buelna, Supervising Planner
Ken Grehm, Department of Public Works Director
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Rae James, Redevelopment Agency
Mary Dietrich, Deputy Facility Services Director
Nick Trifiro, Associate Planner



COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING

March 23, 2010

Harmon Zuckerman, Regional Plan Update Manager
Tahoe Regional Planning Agency
PO Box 5310
Stateline, NV 89449

Dear Mr. Zuckerman:

Thank you for providing Placer County the opportunity to review the TRPA Draft Regional Plan Update Air Quality Element.

These comments have been compiled via outreach to County departments and external agencies, including air quality and fire agencies.

Placer County shares TRPA's objectives of achieving improvements in air quality by implementing practical and measurable projects and services. However, Placer County has concerns with the Air Quality Element's lack of a developed Air Quality Attainment Plan and the absence of science and analysis for supporting the various proposed implementation measures. Placer County, along with other local and regional jurisdictions, respectfully requests that such a plan be created prior to further work on possible implementation measures and that TRPA coordinate with local air districts to ensure consistency with Federal and State air quality attainment requirements. The plan, similar to the development of the Lake Tahoe Total Maximum Daily Load (TMDL) program should, through monitoring and modeling, include a comprehensive scientific analysis of pollutant sources by jurisdiction so that a fair share implementation plan can be developed. The current network of monitoring stations does not adequately characterize key pollutants in Placer County. It would be our expectation that any ensuing implementation measures would then specifically mitigate the impacts identified for each Regional Plan Update alternative.

Without such a plan, and an accompanying cost benefit analysis for each proposed implementation measure, it is impossible to fully assess the implementation lists provided for each alternative. While many of the proposed implementation measures are used, in part, in other regions throughout the United States to successfully reduce air pollution, the list presented may not be a realistic list for a path to attainment.

Other comments:

- Many of the current implementation measures recommended may conflict with other TRPA goals, including water quality/SEZ, and in some cases even seem inconsistent with transportation and air quality goals.
- It is unclear how "prioritization" of TRPA Air Quality Mitigation Funds will be administered. Will funds still be allocated by jurisdiction, or is the proposal to create a basinwide fund? Placer County does not support converting the existing AQ fund structure from jurisdiction specific to basinwide.
- We are unclear how the first AQ goal of attaining and maintaining AQ for human and ecosystem health is different from second goal of reducing emissions. If emissions were reduced then human ecosystem health would be improved. The County recommends including the second goal as part of first one. If not, it would be important to understand the difference in standards for these goals.
- Many of the document's stated "policies" read similar to "implementation measures." For example, under the second goal, policies include installing and maintaining year-round bicycle trails, sidewalks and bike lanes, and integrating traffic signals. These are projects and should be included in a capital improvement plan that would implement the goals and policies.
- Most implementation measures are not documented with enough level of detail for implementers to understand associated capital and ongoing maintenance and operations funding. Many measures also seem to lack understanding of potential limitations of operating in a mountain environment.
- It is recommended that consideration be given to enumerating bullet points so they can be more easily referenced.

Knowing the commitment that TRPA has made to assuring the success of the Regional Plan, the County comments above reflect the County's commitment to assisting TRPA in preparing a Regional Plan that is complete, accurate and, most importantly, implementable.

Placer County remains committed in achieving the overall goal of protecting Lake Tahoe and its surrounding environment while sustaining the vitality and well-being of the various Placer County communities and citizens who reside nearby.

Should you have any questions regarding the information in this letter, please do not hesitate to call me at (530) 745-3044. I look forward to working together with you and your team on the successful completion of the Regional Plan Update.

Sincerely,



PAUL THOMPSON
Deputy Planning Director
Placer County Planning Department

cc: Jennifer Montgomery, District 5 Supervisor
Michael J. Johnson, CDRA Director
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Paul Thompson, Deputy Planning Director