



# North Tahoe Citizen Action Alliance

August 11, 2008

Tahoe Regional Planning Agency  
128 Market Street  
Stateline, Nevada 89449

To: Mr. John Singlaub, Executive Director, and Members of the Governing Board

The importance of the distribution and use of Tourist Accommodation Units (TAUs) has always been of paramount importance to the North Tahoe Citizen Action Alliance's involvement in various development projects on the North and West Shores of Lake Tahoe. In addition, the Community Enhancement Program, and its reservation/award of bonus TAUs, will add density to each of the developments. TAUs are certainly very important to any development, but also to the communities in terms of scale and character. Since a TAU has no unit scale, the transfer of onsite and offsite TAUs is not being given the necessary community impact consideration.

In the TRPA Code of Ordinances Chapter 33 it states *"This chapter sets forth the requirements for regulating the rate and timing of growth within the region. In conjunction with other provisions of this Code and the Goals and Policies, this chapter, through issuance of allocations, distributes, in an orderly fashion, growth and development within the confines of attainment and maintenance of the environmental thresholds."* The practice of allowing a TAU to grow several times its initial size, at the discretion of the developer, is not consistent with this philosophy or the TRPA's responsibility.

The older, and the majority, of existing TAUs are typically identified with small motel units, on the order of 300 square feet. Currently, TAUs are sought for larger timeshare or fractional ownership units ten times, or more, as large as the original entitlement. An original 300 square feet TAU, for a one-bedroom motel unit, is now being transferred to a four-bedroom fractional or timeshare unit on the order of 3,000-4,000 square feet. In addition to this potential 1000%-1300% increase in unit footprint and resulting land coverage, the parking requirements, infrastructure impact, traffic, vehicle miles traveled (VMT), air quality, tree removal, and other environmental impacts, also increase dramatically. This practice does not appear consistent with regulating growth as stated previously. In addition, is not the practice for "bed and breakfast" residences one TAU for each bedroom?

New TAUs are a public entitlement. So a condition to qualify their use/application is reasonable. The transfer of TAUs from one commercial area to another, even within the same county, will likely effect development in the area losing the units.

Based on current Placer County ordinances, parking requirements for motel units are one space per unit, which is adequate for a small motel typically containing one bed, one car and two people. But a TAU transfer to a four-bedroom fractional unit or residence owned by multiple people realistically requires

parking up to four spaces, and the additional provision for a boat trailer. However, this will further increase impervious land coverage and must be considered in the project design and density.

As an example of the unequal effect of a current TAU transfer, consider the Sandy Beach Fractional Ownership project in Tahoe Vista under appeal with Placer County. The largest residence is 3,277 square feet. It has four bedrooms and one parking space. It is unreasonable to assume that eight to ten people will only need one parking space or could reasonably fit in a family vehicle. The land coverage is near 1100% more, based on the increase in unit size. The water/wastewater needs are a minimum of 400% more. This is certainly not an equitable TAU transfer in terms of the infrastructure and the environment. The Sandy Beach project has the potential to change the character of the Tahoe Vista community, based on the expansion of TAUs from small motel units to large homes.

Additionally, consider the Tonopalo Private Residence Club in Tahoe Vista. The Tonopalo Resort has 19 units, 18 of which have 3 bedrooms, averaging 2,100 square feet. There is one four-bedroom unit of about 4,000 square feet, for a total of 58 bedrooms. The TAUs allocated under the current system were 19. There are also 19 onsite parking spaces between the structure and S.R. 28. This has proven totally inadequate with overflow parking on the highway year round, except when prohibited for snow plowing. Some of this parking is across the highway making an extremely hazardous situation for crossing the highway which has no crosswalk within several hundred feet.

NTCAA recommends that a more realistic approach to the TAUs available onsite or transferred should be based on number of bedrooms. This would more accurately reflect the need as illustrated by the examples given above. Also the number of parking spaces should be based on number of bedrooms, with an allowance for boat trailer parking of one space for each unit. The direct benefits would be environmental improvements to Lake Tahoe by reduction of land coverage, decrease of vehicle trips, less air pollution, and preservation of the scale and character of individual communities.

TRPA will be looking at allocations of TAUs in the Regional Plan update. However, NTCAA requests that the TRPA address the equitable transfer of TAUs immediately in this update and issue a revision to the Code as soon as possible. The longer it takes the TRPA to create a TAU transfer system that is not only beneficial to the developer, as it is currently, but is also fair to the scale and character of the community, this inequity will continue.

Sincerely,

NORTH TAHOE CITIZEN ACTION ALLIANCE



Gerald J. Wotel, President  
For the NTCAA Board of Directors