

**City of South Lake Tahoe Housing Element Update  
Response to Comments on Draft**

Comment	Commenter	Response
<p><b>AB686, AFFH Concerns:</b> In reviewing the Sites Inventory it is clear that the majority of the Lower Income sites are clustered in a few large sites near US Highway 50 and California Highway 89, while Moderate Income sites are on smaller sites directly along California Highway 89 and throughout the community. Sites within existing residential neighborhoods are reserved for Moderate and Above Moderate sites.</p> <p>HCD guidelines for housing elements state: “sites identified to accommodate the lower income RHNA must be distributed throughout the community in a manner that affirmatively furthers fair housing.” Currently the housing element for South Lake Tahoe appears to be out of compliance with this guideline. The Lower Income sites are along major thoroughfares and highways, not distributed within existing neighborhoods. I recommend other sites throughout the community and within existing residential neighborhoods be allocated Lower Income.</p>	<p>Maxwell Davis</p>	<p>The areas where lower income sites are located are closer to amenities and transit. Furthermore, these are the most walkable areas of the community, deemed Town Centers, and the City has multiple programs in place to incentivize development in these areas. These are also the areas of the community with zones that allow for higher density development, which is more financially feasible for affordable housing development. HCD's Housing Element Site Inventory Guidebook (Memorandum dated June 10, 2020) identifies that zoning appropriate to accommodate low- and very low- income RHNA for must allow for a density of at least 20 units per acre and parcel size should be between 0.5 acre and 10 acres for affordable housing projects to be financially feasible. Affordability by density will be met on these sites, however lower-income housing will also be promoted throughout the City through promotion of ADUs (Program 2-9), incentives to provide long-term rentals of second homes and spare rooms to low- and moderate-income households (Program 3-9), and encouraging property managers and landlords of existing rental units to advertise them to Section 8 Voucher holders (Program 5-1). Through the sites identified for new lower-income development and these programs, the City has adequate sites to accommodate lower income development across the city in a manner that will promote access to services and resources as well as increase mobility opportunities.</p>
<p><b>AB1397, Reuse of sites:</b> AB1397 requires reused and non-vacant sites in a previous housing element to be rezoned for by-right development of 20% low-income projects. If the proposed site is vacant and reused from the previous two cycles, it must also be rezoned for by-right approval. Sixty of the sites in the 6th Housing Element are reused. These sites were present in the 5th Cycle Housing Element and were in zones in the 4th Cycle as areas for development(though the 4th cycle did not explicitly state all APNs). The city must include a program to rezone these sites.</p>	<p>Maxwell Davis</p>	<p>Per conversation with City zoning should already be in place for this parcel due to the objective design standards. The City's objective Residential Development and Design Standards, adopted in 2021, allow housing on this parcel with ministerial review, so the parcel's zoning is compliant with State law and does not require additional zoning changes at the City level.</p>

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<p><b>Height restrictions:</b> The city restricts building heights to two stories in most of the city and acknowledges that “This height limitation, combined with land coverage and setback restrictions, limits the feasibility of affordable housing and mixed-use projects” It is unlikely that most affordable housing projects would be feasible when limited to two story buildings. The city cannot list sites for low income housing that are impossible for low income housing. Therefore, the city must remove the height maximums and setback restrictions that make low income housing financially infeasible.</p>	<p>Maxwell Davis</p>	<p>Sites identified in the Site Inventory as suitable for low and very low income housing are located within Area Plan districts which allow height greater than two stories. One of the sites is located within the Tourist Core Area Plan Tourist Center Neighborhood Mixed-Use district which allows development up to 36' (3 stories), one is located in the Tourist Core Area Plan Tourist Center Mixed-Use district which allows development up to 56' (4 stories), and two are located in the Tahoe Valley Area Plan Town Center Mixed-Use Corridor district which allows development up to 42' (3 stories). Height is not a constraint to development in these areas.</p>
<p><b>Parking:</b> The city acknowledges that "The cost of land associated with parking, in addition to the costs of construction, paving, and maintenance, drive up the overall cost of development, reducing funds available for the development of affordable housing" and that parking minimums are "arbitrarily established". Therefore, having concluded that parking minimums are both arbitrary and financially burdensome, the city must include a program to remove or reduce them.</p>	<p>Maxwell Davis</p>	<p>Parking standards are not an actual constraint on the development of housing. See revised text providing clarification on page 4-162. Text added: The City of South Lake Tahoe has developed parking standards with the intent to better align parking requirements with the actual needs of residents. The parking requirement for studio and one bedroom units has been reduced to one parking space and additional parking reductions can be approved for multi-family projects where the property owner assumed responsibility for parking management (City Code Section 6.85.030.6.c.xiii) to prevent environmental impacts associated with parking in non-paved areas and safety impacts associated with parking long term on public streets during snow removal operations. Deed restrictions placed on properties approved for reduced parking will allow for enforcement of parking management if necessary.</p>
<p>City government has a duty and obligation to identify constraints to the development of housing for all income groups, and City officials have a duty to overcome these constraints and not simply say that TRPA or some other Federal or State agency will not let us do it.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The Tahoe Regional Planning Agency was established through a Bi-State Compact between the governments of California and Nevada which was ratified by the US Congress in 1969. The Bi-State Compact as revised in 1980 gives TRPA authority to adopt environmental quality standards and to enforce ordinances designed to achieve these standards. As an incorporated city within the jurisdiction of the TRPA, the City of South Lake Tahoe must work within the regulatory environment of the TRPA as well as the State of California and Federal government. Constraints to housing development due to TRPA regulations are identified in the Housing Element and acknowledgement of the City's obligation to work towards agreeable changes to TRPA regulations to reduce these constraints is included in Program 2-8.</p>

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<p><b>In Lieu Payments-</b> Should a State or Federal governmental agency wish to acquire developable residential, commercial, or industrial lands land within the City limits for any purpose, City officials will insist that the State or Federal government pay the City an in-lieu tax for its removal from the property tax roll and the funds from these in lieu payments shall be deposited in an affordable housing fund to support implementation of the Housing Element.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The requestor's suggestion is beyond the City's authority. General law cities like the City of South Lake Tahoe require statutory authority to impose taxes under California Constitution Article XIII, § 24. State-owned property is exempt from local taxes under California Constitution Article XIII, §3(a). There is no state law provision requiring the state to pay a city fees in lieu of property taxes. Under federal law (31 U.S.C. § 6902 <i>et seq.</i> , counties are the recipients of in-lieu fees for federally owned property (known as "Payment in Lieu of Taxes" or PILTs) and counties are not required to distribute these fees to other governmental agencies within their boundaries. <i>See Lawrence County v. Lead-Deadwood Sch. Dist. No. 40-1</i> , 469 U.S. 256 (1985).</p>
<p><b>Safety of Acquired Lands</b> – In order to protect the safety and welfare of existing affordable and workforce housing (and all existing housing) from the threat of catastrophic fire, the City shall require that all publicly owned vacant lands within the city are annually inspected by a fire professional and action taken to remove dangerous fuels from these vacant parcels in a timely manner and in a manner acceptable to the Fire Department.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In response to this and other comments regarding fire safety the City has included the following new policy in the Housing Element: Policy 3-8: City shall implement actions identified in Safety Element policies HS-2.1 through HS-2.8 for all housing development in the City in order to mitigate potential fire hazards and damage to structures in the event of a wildfire.</p>
<p><b>Compliance with the General Plan and Housing Element</b> – All acquisition of residential and other lands within the City limits by another Federal, State, or local agency will require the party to have the proposed acquisition reviewed by the Planning Commission and City Council that will determine and make appropriate written findings that the acquisition is consistent with the City's General Plan and Housing Element.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The requestor's suggestion is beyond the City's authority. State and federal governmental agencies have independent authority to acquire and dispose of property and the City does not have discretion to approve or deny these actions. Development proposals from these governmental agencies, on the other hand, may be subject to City discretionary review and permitting depending on the circumstances.</p>
<p><b>Adequate Fire Protection Required</b> – All providers of domestic water service will be required to submit a plan and timeline for ensuring that there is adequate water pressure (as established by the NFPA) to charge existing fire hydrants so that in the event of a fire emergency impacting residential and affordable housing units, first fire responders will have adequate water to fight the fire. This adequate fire flow protection for our community is a safety imperative.</p> <p>In this regard, the City of South Lake Tahoe will assist water agencies to seek Federal and State funds to make the much-needed improvements.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In response to this and other comments regarding fire safety the City has included the following new policy in the Housing Element: Policy 3-8: City shall implement actions identified in Safety Element policies HS-2.1 through HS-2.8 for all housing development in the City in order to mitigate potential fire hazards and damage to structures in the event of a wildfire.</p> <p>Policy HS-2.4, Fire Flow Adequacy, addresses this comment.</p>

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<p><b>Undergrounding of All Utilities in Residential Areas-</b> In order to provide the highest degree of protection for existing and proposed housing in the City limits, the City will actively pursue Federal and State grants and loans to ensure that all electrical, telephone, and cable facilities are placed underground. No cell towers or cell facilities will be installed in or near residential areas unless a comprehensive environmental impact assessment is done on the overall facilities plan and the safety of these facilities is determined, and appropriate mitigation measures are taken to ensure the safety of persons living here. The goal here is to see that these radiation producing facilities are placed underground. Undergrounding is a viable alternative to above ground cell towers and facilities.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The Public/Quasi-Public Facilities and Services Element of the adopted City General Plan addresses energy and telecommunications infrastructure. Policies PQP-8.2 and PQP-8.6 address underground utilities and Policy-8.4 directs the City to coordinate with utility providers to design systems to minimize environmental, aesthetic, and safety impacts.</p> <p>Under the federal Telecommunications Act, local agencies like the City are limited in their ability to deny applications for wireless communication facilities where they are needed to close a significant gap in service, and are prohibited from regulating these facilities based on environmental impacts from radiofrequency (RF) emissions. 47 U.S.C. §§ 332(c)(7)(B)(i), (iv); <i>MetroPCS, Inc. v. San Francisco</i>, 400 F.3d 715, 732-34 (9th Cir. 2005).</p>
<p>In the table of actions and programs item 2-8 deals with the 1st time homebuyer program administration and it states that no entities expressed an interest in administering this program. We have had a few conversations where we discussed that this would be an appropriate role for SJCLT and we have been awaiting the RFP to respond. I have been meaning to ask about the status since we were hoping that the program would be up and running in time for the Riverside Project sales.</p> <p>What is the status? Why does this indicate that no entity had expressed interest when we have been discussing this?</p>	<p>Jean Diaz, St. Joseph Community Land Trust</p>	<p>When this program was adopted in 2014, the idea was to approach the County for assistance since they administer first time homebuyer programs as well. That was done and they were not interested. I certainly acknowledge that we have had more recent discussions with SJCLT about the potential for SJCLT administering a moderate-income homebuyer program and some funding has been secured so this text could be revised to better reflect that. On page HE-9, the City proposes to continue this effort through the next Housing Element cycle (2022-2027). Program 2-7 (Moderate Income Homebuyer Program) is proposed in this Housing Element Update to address this comment.</p>
<p>Make the following edits shown to Policy 1-3: The City shall work with the California Department of Housing and Community Development, <del>and through</del> the California Legislature, <u>and through other appropriate legal means</u> to remove unreasonable barriers to the implementation of the goals, policies, and programs of the City's Housing Element and to maintain consistency with state law.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In response to this comment the suggested revision to Policy 1-3 has been made.</p>
<p>Make the following edits shown to Policy 1-7: The City shall direct high-density residential development <u>(to the extent that they are available)</u> to sites within walking distance of public transit and services. The City shall consider minimum density requirements in these areas.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The commentor's suggested edit is appreciated. However, the additional text is not necessary since all development is limited by the availability of sites. Sites identified in the Sites Inventory have been selected based on their access to amenities such as public transit and other services. Policies and Programs included in the Housing Element are intended to increase the availability and feasibility of sites to be developed to meet the City's housing needs.</p>

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<p><b>Protect Existing Affordable Housing Opportunities</b> – The City shall make every reasonable effort to protect existing affordable housing opportunities within the City limits from their conversion to other uses by either a private party or other governmental agency.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The City has included the following Policies and Programs in the Housing Element to support this comment: Policies 3-4, 3-7, Programs 3-2: Multi-family Dwelling and Single-Room Occupancy Inspection and Maintenance Program, Program 3-3: Mobile Home Parks Ordinances, Program 3-4: Preservation and Acquisition of At-Risk Properties, Program 3-6: Replacement of Lost Units From Residential Demolitions and Program 3-10, Mobile Home Park Preservation.</p> <p>To further respond to this comment, the City has revised Program 3-10 to add a new bullet as follows: "Work with HCD Mobilehome and Special Occupancy Parks Program to gather and maintain data on resident complaints, inspections and code violations."</p>
<p>Edit to Policy 2-4: The City shall inform and educate the public regarding the myths and realities of multifamily housing and affordable housing. <u>The City shall also ensure that multi-family housing development have responsible onsite management.</u></p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>California Code of Regulations, Title 25, Article 5, Section 42 requires that properties with sixteen or more units have an on-site manager. In addition, the City conducts the Multi-family Inspection Program that requires an annual inspection of all properties with six or more units. The purpose of the inspection is to ensure compliance with building, fire, property maintenance and health and Safety Code requirements.</p>
<p>Make the following edits shown to Policy 1-9: <u>The City shall take all reasonable and legal means to ensure that existing affordable and workforce housing opportunities are protected and preserved, and discourage the demolition of existing affordable housing sites. All Federal and State land acquisitions within the City limits must be reviewed to determine their compliance with the City's adopted General Plan and Housing Element and this review must include written findings by the Planning Commission and City Council.</u> <del>support the efforts of the California Tahoe Conservancy in the Tahoe Livable Communities program to remove blighted properties and repurpose associated development commodities. The City shall encourage the use of residential commodities for affordable housing located in or near Town Centers.</del></p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The commentor's suggested edit is appreciated and in response the City has included the following new policy in the Housing Element:</p> <p>Policy 3-9: The City shall take all reasonable means to ensure that existing affordable and workforce housing opportunities are protected and preserved, and discourage the demolition of existing affordable housing sites without adequate mitigation.</p> <p>State and federal governmental agencies have independent authority to acquire and dispose of property and the City does not have discretion to approve or deny these actions. Development proposals from these governmental agencies, on the other hand, may be subject to City discretionary review and permitting depending on the circumstances.</p>

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<p>Make the following edits shown to Policy 1-10: The City shall actively seek opportunities to obtain federal, state, and local funding for affordable housing <u>and funding to ensure that all public lands adjacent to existing housing is made fire safe and community development.</u></p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In response to this and other comments regarding fire safety the City has included the following new policy in the Housing Element: Policy 3-8: City shall implement actions identified in Safety Element policies HS-2.1 through HS-2.8 for all housing development in the City in order to mitigate potential fire hazards and damage to structures in the event of a wildfire.</p> <p>In addition, the City has made the following revision to Policy 1-10: Policy 1-10: The City shall actively seek opportunities to obtain federal, state, and local funding for affordable housing <u>and implementation of General Plan policies and programs to support housing affordability, community development and safety.</u></p>
<p>Add a new policy: The City shall pursue funding and collaborative efforts to ensure that all overhead utilities are placed underground including cell facilities to better protect residents from fire and exposure to radiation from cell facilities.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The Public/Quasi-Public Facilities and Services Element of the adopted City General Plan addresses energy and telecommunications infrastructure. Policies PQP-8.2 and PQP-8.6 address underground utilities and Policy-8.4 directs the City to coordinate with utility providers to design systems to minimize environmental, aesthetic, and safety impacts.</p>
<p>Add a new policy: The City shall require that all public land acquisitions within the City limits by Federal and/or State agencies pay an in-lieu of property tax for removing these parcels off of the tax rolls with the funds from these in lieu payments being deposited with the City in a Housing Element Implementation Fund.</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>The requestor's suggestion is beyond the City's authority. General law cities like the City of South Lake Tahoe require statutory authority to impose taxes under California Constitution Article XIII, § 24. State-owned property is exempt from local taxes under California Constitution Article XIII, §3(a). There is no state law provision requiring the state to pay a city fees in lieu of property taxes. Under federal law (31 U.S.C. § 6902 et seq., counties are the recipients of in-lieu fees for federally owned property (known as "Payment in Lieu of Taxes" or PILTs) and counties are not required to distribute these fees to other governmental agencies within their boundaries. See <i>Lawrence County v. Lead-Deadwood Sch. Dist. No. 40-1</i> , 469 U.S. 256 (1985).</p>

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<p>Edit Program 1-3 to add one additional bullet as shown below: The City shall continue to research best practices for parking standards and continue to allow more flexible parking standards and shared parking for mixed-use and other housing projects. Additional updates to parking standards could include one or more of the following practices:</p> <ul style="list-style-type: none"> <li>• Encouraging affordable housing developers to unbundle parking and rent parking spaces separately from the units.</li> <li>• Allowing housing developers to pay an in-lieu fee to support public transportation access to the project site in place of some of the parking requirements.</li> <li>• <u>In no case, however, shall the City waive the requirements for off-street parking if in doing so there are insufficient parking spaces onsite to accommodate the development and create overflow parking problems on City streets.</u></li> </ul>	<p>David M. Jinkens, Good Government Advocate</p>	<p>See revised text on page 4-162 providing clarification on adopted City parking standards. Text added: The City of South Lake Tahoe has developed parking standards with the intent to better align parking requirements with the actual needs of residents. The parking requirement for studio and one bedroom units has been reduced to one parking space and additional parking reductions can be approved for multi-family projects where the property owner assumes responsibility for parking management (City Code Section 6.85.030.6.c.xiii) to prevent environmental impacts associated with parking in non-paved areas and safety impacts associated with parking long term on public streets during snow removal operations. Deed restrictions placed on properties approved for reduced parking will allow for enforcement of parking management if necessary.</p>
<p>Question on Policy 2-8: This policy needs further explanation and discussion) Who is the college supposed to serve and for whom is housing on campus being built?</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>Policy 2-5 supports LTCC planning and development of housing for students, faculty and employees. The LTCC 2020-2030 Campus Master Plan includes potential sites for residential student living and mixed residential living and LTCC has conducted more detailed analysis of options to finance the development of student and workforce housing in the "Due Diligence and Concept Developmetn of P3 Opportunitites for Resdential Student Living" (August 30, 2019).</p>
<p>Edit to Program 2-9: The City shall continue to provide information that describes the myths and realities of multifamily and affordable housing development. This will include promoting ADUs as a housing option in the city <u>where appropriate and ere it does not disrupt or overload existing neighborhoods</u>). The City will also continue to publicize programs, such as energy-efficiency programs and state and federal funding programs currently available to South Lake Tahoe residents. Information is available on the City's website and, when needed, the City makes....</p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In March 2021 the City adopted an ordinance to allow ADUs on parcels zoned to allow single-family or multifamily dwelling residential uses and that includes a proposed or existing dwelling (City Code Section 6.85.050. The policy as originally written is consistent with the recently adopted ordinance.</p>

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<p>Edit to Policy 3-2: The City shall continue to ensure that housing in the city is decent, safe, and sanitary for its occupants <u>and ensure that Federal and State lands adjacent to existing housing is made fire safe and regularly maintained.</u></p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In response to this and other comments regarding fire safety the City has included the following new policy in the Housing Element: Policy 3-8: City shall implement actions identified in Safety Element policies HS-2.1 through HS-2.8 for all housing development in the City in order to mitigate potential fire hazards and damage to structures in the event of a wildfire.</p> <p>In addition, the City has made the following revision to Policy 1-10: Policy 1-10: The City shall actively seek opportunities to obtain federal, state, and local funding for affordable housing and implementation of General Plan policies and programs to support housing affordability, community development and safety.</p>
<p>Edit and question on Program 3-4: The City shall continue to provide technical and financial assistance <del>to the St. Joseph Community Land Trust and other</del> nonprofit housing organizations that might be interested in, and have the capacity to, step in to acquire and rehabilitate any of the assisted or substandard properties to maintain, or create, long-term, affordable rental housing. <u>(preferred agents should not be mentioned in this plan) Housing so rehabilitated should be made available on a priority basis to existing City residents in need,</u></p>	<p>David M. Jinkens, Good Government Advocate</p>	<p>In response to this comment, the City revised Program 3-4 as follows: The City shall continue to provide technical and financial assistance to the St. Joseph Community Land Trust and other nonprofit housing organizations that might be interested in, and have the capacity to, step in to acquire and rehabilitate any of the assisted or substandard properties to maintain, or create, long-term, affordable rental housing. <u>The City may consider adopting a policy that prioritizes local residents for housing rehabilitation services.</u></p>
<p>Deed restrictions/oversight - as the City moves forward with deed restrictions we must keep in mind that creating a deed restriction and enforcing a deed restriction, are two different things. We are in the process of cataloging deed restrictions in the Incline Village portion of Tahoe where deed restrictions are willingly ignored because there's no fear of enforcement. Given this regional history of not enforcing deed restrictions, we recommend working with the TRPA to ensure the required staffing (including the creative opportunity for a consulting contract) is in place to manage any current and future deed restrictions.</p>	<p>Tahoe Prosperity Center</p>	<p>In response to this comment the City has included the following new Housing Element policy: Policy 2-10: The City shall ensure that deed restrictions placed on affordable housing are monitored and enforced.</p>

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<p>The Housing Element states that “height standards are an ‘actual constraint’ related to housing, especially with Mixed-use projects that contain residential and commercial uses since they are limited to two stories.” Since the impact is on the financial feasibility of a mixed use project, perhaps the City could use funds to help these types of projects pencil. It’s our understanding that redevelopment at the Crossings didn’t pencil for this very reason. Given the dire need for local housing, the City could consider using funds to offer an incentive to developers - fund the financing gap, a zero interest loan, or some other creative means. If the City offered the right incentives, these types of projects could be a particularly valuable type of development in select parts of the City - for example the two parcels at 3900 and 3908 Lake Tahoe Blvd appear to be a prime potential location for mixed use.</p>	<p>Tahoe Prosperity Center</p>	<p>Sites located within Area Plan districts which allow greater height do not have a constraint associated with height standards. Mixed use and housing projects are incentivized in Town Centers through increased allowable land coverage, increased density and the ability to obtain residential allocations, RUUs and land coverage rights from the City. Program 1-4 directs the City to provide more information regarding available incentives and Program 1-1 directs the City to continue to create incentives for mixed use and housing projects.</p>
<p>It’s noted in the report that City building code enforcement is not an “actual constraint” to providing housing, and this surprises us. We’ve had numerous conversations with realtors and developers who feel that because of minimal code enforcement, we have an environment where there’s no incentive for owners of old, poorly maintained housing to either fix or sell their properties. We’d like to see increased enforcement of building codes on the owners of dilapidated properties, whether they be apartments, SRO’s, or even single family homes. Increased enforcement combined with City program 3.1, the rehabilitation loan program, could be a great stick AND carrot approach to incentivizing improvements and providing a path for property owners to do it.</p>	<p>Tahoe Prosperity Center</p>	<p>Housing Element Program 3.5 addresses continued enforcement of building, fire, health and zoning codes to improve the condition of existing housing stock. In addition, the City addresses maintenance of the quality of the existing housing stock in Program 3-1. In response to this comment, the City clarified text in Program 3-1 as follows: "The City shall develop a housing rehabilitation program to serve city residents in order to incentivize improved housing conditions, harden homes against wildfire threats, and make energy efficiency upgrades <u>while maintaining affordability</u>."</p>

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<p>The report shows that since the last housing element, only 19 of the targeted 63 RHNA units were built in the “moderate income” category. This is the second biggest miss, next to the “extremely low income” category. This moderate income category is what the term “missing middle” refers to, and we’d like to encourage a particular focus on this income category so we don’t continue to lose our non-service industry workforce. As Barton Hospital and others have pointed out, even good paying medical and legal jobs aren’t being filled because there’s virtually no housing available at even the moderate price point. We recommend the City to again consider ways to incentivise the very important but frequently overlooked segment of the market with things like no permit fees, by-right development, ministerial review of design standards, bonus units (beyond TRPA) if a project stays fully in moderate AMI, streamlined permitting (similar to by-right, but a true accelerated plan review within 30 days), and anything else that might ensure we reach those RHNA goals in the next couple of years.</p>	<p>Tahoe Prosperity Center</p>	<p>In response to this comment the City has revised Program 2-1 as follows:</p> <p>Program 2-1: Pursue State and Federal Funds To support the creation of quality, affordable housing optionf for extremely low-, very low-, low-, <u>and moderate-income</u> households, the City shall continue to seek and pursue grant opportunities for state and federal funds, when appropriate and feasible.</p> <p>Implementation of this policy along with Program 2-11 is intended to provide funding for the City to create additional incentives to develop housing for all income categories.</p> <p>In March 2021 the City adopted objective residential development and design standards that reduce permitting requirements for housing projects up to four units, requiring ministerial review only. These standards also provide the opportunity to larger housing projects to be reviewed ministerially if they are designed consistent with the objective development and design standards specified (City Code Chapter 6.85).</p>
<p>In light of the extraordinary changes to our housing market in the last two years, this might be a good time to readdress the concept of a Vacancy tax for 2nd homeowners. This could spur 2nd homeowners to action, serving two potential purposes: a) create a sustainable pool of funds that could be earmarked specifically for housing initiatives in the City, and b) incentivize owners of older 2nd homes that are rarely if ever used, to put their home to better use whether that be listing their house on the market to increase supply, or <u>renting to a local.</u></p>	<p>Tahoe Prosperity Center</p>	<p>The City is committing to evaluating the feasibility of creating a vacancy tax as well as other local housing revenue mechanisms in Program 2-11.</p>
<p>Two related tools that were listed in the South Shore Action Plan and have had proven impact in other communities, but are not listed in this report, are inclusionary zoning and residential/commercial linkage policies. We recommend considering both of these types of policies, including in-lieu fees, for future development, to help ensure the RHNA numbers are met across the income spectrum.</p>	<p>Tahoe Prosperity Center</p>	<p>In response to this comment the City has revised Program 2-11 as follows:</p> <p>Program 2-11: Local Funding Source Feasibility Study and Linkage Program The City shall conduct a feasibility study to explore local funding options to support affordable housign projects and programs. Examples of options to pursue include vacancy tax, housing transfer tax, sales tax, transient occupancy tax, linkage fees, impact fees, <u>inclusionary housing in-lieu fees</u>, and housing investment or trust funds...</p>

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Under Student Housing - for whom is student housing intended?	Housing Element Workshop, February 7, 2022	Policy 2-5 supports LTCC planning and development of housing for students, faculty and employees. The LTCC 2020-2030 Campus Master Plan includes potential sites for residential student living and mixed residential living and LTCC has conducted more detailed analysis of options to finance the development of student and workforce housing in the "Due Diligence and Concept Development of P3 Opportunities for Residential Student Living" (August 30, 2019).
I know the RHNA numbers are set, but are there more higher-income housing than lower-income units projected in the RHNA? Did you say higher income units were set because some of the higher income housing could be used as commercial? Or why is the higher income housing so much higher than the lower income housing?	Housing Element Workshop, February 7, 2022	The City recognizes that the numbers that the state provided in the above moderate category are higher than what we expected compared to the other categories. Through our data analysis and public outreach, we've heard to address a higher need for lower income housing than what the State addresses. Therefore, our sites inventory has a larger amount of units identified for lower income housing. Policies and programs included in the Housing Element are focused on creating more housing opportunities and housing units for very low, low and moderate-income residents.
Consider a vacancy tax to incentivize homeowners to rent long term	Housing Element Workshop, February 7, 2022	The City is committing to evaluating the feasibility of creating a vacancy tax as well as other local housing revenue mechanisms in Program 2-11.
Why does the draft Housing Element state that code enforcement is not a constraint to housing? Code enforcement should be a higher priority. Address dilapidated properties to avoid overall effects on the community.	Housing Element Workshop, February 7, 2022	Housing Element Program 3.5 addresses continued enforcement of building, fire, health and zoning codes to improve the condition of existing housing stock.
Rehabilitation Programs need more focus on how they could be implemented.	Housing Element Workshop, February 7, 2022	The City has added more specifics per HCD comment to timing of this program. The City will explore the best ways to support housing rehabilitation as part of Program 3-1. In addition, the City has clarified the language in Program 3-1 as follows: "The City shall develop a housing rehabilitation program to serve city residents in order to incentivize improved housing conditions, harden homes against wildfire threats, and make energy efficiency upgrades <u>while maintaining affordability.</u> "
Fair housing issues - landlord/tenant mediation needed for issues with landlords charging illegal fees - e.g. related to credit check, issues with evictions. More efforts are needed to make sure renters are aware of their rights.	Housing Element Workshop, February 7, 2022	The City of South Lake Tahoe has created a Housing Issues Hotline to assist residents with landlord-tenant concerns. The Housing Issues Hotline is a phone number residents can call and get information, locate resources, request assistance, or potentially file a complaint regarding the condition of your rental unit. The City also provides inspection and compliance services to address substandard housing issues and provides resource references for tenants to address other concerns, including legal assistance. The City offers information on fair housing issues in Spanish at the planning counter as well. In response to this comment, the City has revised Program 5-1 to add one additional bullet as follows: " <u>[The City will] continue the Housing Issues Hotline service to assist residents with substandard housing and fair housing concerns.</u> "

## City of South Lake Tahoe Housing Element Update Response to Comments on Draft

Comment	Commenter	Response
<p>Would like the City to institute a rental housing inspection program for ALL rental housing. Another attendee agreed and said this program should be highest priority.</p>	<p>Housing Element Workshop, February 7, 2022</p>	<p>California Code of Regulations, Title 25, Article 5, Section 42 requires that properties with sixteen or more units have an on-site manager. In addition, the City conducts the Multi-family Inspection Program that requires an annual inspection of all properties with six or more units. The purpose of the inspection is to ensure compliance with building, fire, property maintenance and health and Safety Code requirements. In addition, Housing Element Program 3.5 addresses continued enforcement of building, fire, health and zoning codes to improve the condition of existing housing stock.</p>
<p>Address demographic trends in the community as future planning take place. School enrollment and number of registered voters in the City has been declining</p>	<p>Housing Element Workshop, February 7, 2022</p>	<p>School district enrollment data was added to the Housing Element as new Section 4.2.2.9. Information about voter registration in South Lake Tahoe was not readily available for inclusion in the Housing Element.</p>
<p>Partnerships with large employers to address how they can participate in solutions to housing being a barrier to attracting and retaining employees. Program ideas include:</p> <ul style="list-style-type: none"> <li>o Partnerships with property management companies to provide employers notification and first right of refusal as units become available.</li> <li>o Making first time homebuyer programs available to employees.</li> </ul>	<p>Housing Element Workshop, February 7, 2022</p>	<p>The commenter's suggestions have been added as examples of additional programs to pursue in Program 2-2.</p>
<p>Assistance to employees that initially need to rent when they move to town but ideally want to purchase a home for the long term.</p>	<p>Housing Element Workshop, February 7, 2022</p>	<p>The commenter's suggestions have been added as examples of additional programs to pursue in Program 2-2.</p>
<p>Renter displacement is a concern</p>	<p>Housing Element Workshop, February 7, 2022</p>	<p>The City agrees that the recent trend of increased renter displacement and homes are sold is a concern. The City has initiated the Lease to Locals program, which provides incentives to second homeowners to rent their home long term, in order to increase the availability of rental properties in the City.</p>
<p>Consider changing how VHRs are defined to longer than 30 days, possibly 6 months.</p>	<p>Housing Element Workshop, February 7, 2022</p>	<p>The current definition of a VHRs as the rental of a dwelling for a period of less than 30 consecutive calendar days stems from California Revenue and Taxation Code 7280 which allows the collection of transient occupancy tax on lodging rented for thirty days or less. If the definition of VHR includes rentals for longer than thirty days, transient occupancy tax would not be able to be collected on these lodging services. Transient Occupancy Tax revenues would not be available to administer an expanded VHR program. The City's focus is on providing incentives, through the Lease to Locals Program, to property owners that rent their properties for long term. These incentives are only available to owners that rent their home or a room in their home for at least one year.</p>

## City of South Lake Tahoe Housing Element Update Response to Comments on Draft

Comment	Commenter	Response
Issue of mismatch between median income and the cost of market-rate housing. What Housing Element programs work to create more affordable units?	Housing Element Workshop, February 7, 2022	Many programs in the draft Housing Element work together towards creation of affordable housing. Programs 1-1 and 1-4 direct the City to develop incentives for the development of new housing units. Programs 2-1 through 2-13 direct the City to support and reduce barriers to the development to housing specifically for low-income, moderate-income and workforce residents. Programs 3-1 through 3-10 focus on the preservation and rehabilitation of existing housing units and increasing the availability and affordability of these units.
People are afraid to report landlords who don't keep things up to code because they won't have a place to live	Housing Element Workshop, February 7, 2022	<p>The City is sensitive to this concern that residents have when responding to housing condition complaints. In response to this comment the City has included the following text in the discussion of Fair Housing and Displacement Risk.</p> <p>As discussed in Section 4.2.6.2.3, complaints about poor home condition due to deferred maintenance or absentee landlords is one of the primary issues reports to El Dorado County Fair Housing. However, with the scarcity of affordable housing, some tenants may be hesitant to submit maintenance requests to their landlord or property manager for fear of retaliation, such as unjust eviction or rent increases. Lower-income renters are particularly at risk of displacement as a result of poor housing conditions if retaliation occurs, as there are limited alternative housing options. The City is aware of this concern residents may have and aims to proactively address substandard housing conditions through the Multi-Family Inspection Program, which will result in the City requiring maintenance by the homeowner rather than a request from the tenant. Additionally, the City has included Program 3-1 to provide rehabilitation assistance which will reduce barriers to maintenance and is intended to enable landlords and property managers to proactively address safety issues and reduce the burden on tenants to submit a request.</p> <p>Many Programs contained in the Housing Element are designed to address the shortage of affordable housing units in the City, which as the commentor noted, increases concerns of being displaced.</p>
Enhanced fire safety policies, would that belong in the Housing Element?	Housing Element Workshop, February 7, 2022	In response to this and other comments regarding fire safety the City has included the following new policy in the Housing Element: Policy 3-8: City shall implement actions identified in Safety Element policies HS-2.1 through HS-2.8 for all housing development in the City in order to mitigate potential fire hazards and damage to structures in the event of a wildfire.
Does the City have any control over setting the RHNA?	Housing Element Workshop, February 7, 2022	In response to this comment, the City has added a discussion of the RHNA process and how it is determined in Section 4.3.1.1.1, Survey of Available Land, of the Housing Element (page 4-109). The Housing Element now describes that the RHNA is set by the State and the City does not have input when the RHNA is set.
Program 2-6, Assist Nonprofit Housing Developers – <i>priority</i>	Gavin Feiger, Planning Commission Meeting, February 10, 2022	Program 2-6 has been included in the Housing Element with an ongoing timeframe that is continuous.

**City of South Lake Tahoe Housing Element Update  
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Comment	Commenter	Response
Program 2-11 LOCAL FUNDING SOURCE FEASIBILITY STUDY AND LINKAGE PROGRAM – <i>LOVE, extra priority</i>	Gavin Feiger, Planning Commission Meeting, February 10, 2022	Program 2-11 has been included in the Housing Element with a timeframe that calls for completion of the funding feasibility analysis by September 2022 and adoption of an ordinance by September 2023.
Rehabilitation/conservation – <i>like, prioritize this whole category</i> •» Program 3-4, Preservation and Acquisition of At-Risk Properties – <i>like, extra priority</i> •Program 3-5 PRESERVATION OF HOUSING CONDITIONS – <i>like</i> •Program 3-6 REPLACEMENT OF LOST UNITS FROM RESIDENTIAL DEMOLITIONS – <i>like, extra priority</i> • <i>Like all of these</i>	Gavin Feiger, Planning Commission Meeting, February 10, 2022	These programs have been included in the Housing Element with ongoing timeframes that will be continuous.
Energy Conservation Opportunities – yes, prioritize all to help implement CAP and meet renewable energy resolution.	Gavin Feiger, Planning Commission Meeting, February 10, 2022	These programs have been included in the Housing Element with ongoing timeframes that will be continuous.
Program 6-1 GREEN BUILDING INCENTIVE PROGRAM – <i>include coverage free or discounted from City pool if available?</i>	Gavin Feiger, Planning Commission Meeting, February 10, 2022	In response to this comment Program 6-1 has been revised as follows::  Program 6-1: Green Building Incentive Program The City shall continue to implement its Green Building Incentive Program that rewards developers for building green projects. <u>The City shall also evaluate opportunities to provide additional incentives for green building projects.</u>
POLICY 6-1 The City shall ensure that new construction meets Title 24 energy conservation requirements and shall retrofit older summer seasonal housing to be made suitable for year-round occupancy. – <i>include reference to Reach code for when it is finalized?</i>	Gavin Feiger, Planning Commission Meeting, February 10, 2022	In response to this comment, Policy 6-1 has been revised as follows:  Policy 6-1: The City shall ensure that new construction meets <u>or exceeds</u> Title 24 energy conservation requirements and shall <u>require retrofits</u> of older summer seasonal housing to be made suitable for year-round occupancy.

## City of South Lake Tahoe Housing Element Update Response to Comments on Draft

Comment	Commenter	Response
<p><i>Missing Middle:</i> Policy 2-5 states "The City recognizes that it will become difficult to attract employees if they cannot afford to purchase or rent housing in South Lake Tahoe. The City shall encourage and support programs and activities that create a robust local economy that provides residents with good paying employment and the means to purchase or rent housing in the city." <i>Not sure how the City can do this, but with all of the market-rate being approved, and seemingly that is the trend, need to directly assist renters. Like Program 2-7, but for renters. The community also seemed to ask for this based on the input and poll results Zach presented. If not a whole new program, maybe it could be added to 2-7, or somehow integrated with 2-11.</i></p>	<p>Gavin Feiger, Planning Commission Meeting, February 10, 2022</p>	<p>The City added a new Program 2-15 to address this comment as follows:  <u>"The City shall seek funding to establish a rental assistance program. The rental assistance program would provide financial assistance for initial rental deposits for lower-income households in South Lake Tahoe. Renters in the program would gradually repay the deposit to the City in installments as part of a pre-established payment plan."</u></p>
<p>Program 1-3, Parking Best Practices – <i>I would like to prioritize this, like the intent to allow more shared parking and flexible parking standards. I like the direction you went with the new residential design standards.</i></p> <ul style="list-style-type: none"> <li>• Encouraging affordable housing developers to unbundle parking and rent parking spaces separately from the units.</li> <li>• Allowing housing developers to pay an in-lieu fee to support public transportation access to the project site in place of some of the parking requirements</li> <li>• <i>Like both of these, but what about getting rid of parking minimums for some projects like affordable housing or commercial in Town Centers? Also, straightforward parking exemption form/tool. Make TVAP parking policies City-wide, reduced or no parking minimums for bonus units or in bonus unit boundary areas.</i></li> </ul>	<p>Gavin Feiger, Planning Commission Meeting, February 10, 2022</p>	<p>Parking standards are not an actual constraint on the development of housing. See revised text providing clarification on page 4-162.</p> <p>Text added:  The City of South Lake Tahoe has developed parking standards with the intent to better align parking requirements with the actual needs of residents. The parking requirement for studio and one bedroom units has been reduced to one parking space and additional parking reductions can be approved for multi-family projects where the property owner assumed responsibility for parking management (City Code Section 6.85.030.6.c.xiii) to prevent environmental impacts associated with parking in non-paved areas and safety impacts associated with parking long term on public streets during snow removal operations. Deed restrictions placed on properties approved for reduced parking will allow for enforcement of parking management if necessary.</p>

## City of South Lake Tahoe Housing Element Update Response to Comments on Draft

Comment	Commenter	Response
<p>Program 2-2, Partnerships for Workforce Housing – I would like to prioritize this, but not as proposed. Its a good idea, but how is it implementing proposed Policy 2-7 (which states "The City shall encourage employers with a large seasonal workforce located in or near South Lake Tahoe to develop or acquire employee housing for their workers, especially the quantified objective to Facilitate the development of 40 workforce and seasonal housing units to facilitate housing mobility and reduce displacement due to overcrowding and overpayment"). The program only seems to be proposing a loan for first/deposit. Policy 2-7 is the same policy from 2014-2022 and the review for this update says the program has been successful but only points to 3 homes built in the whole 8 years and no direct link to workforce besides a mention of LTCC being a partner. Student housing provides a better example of what I'd like to see with Program 2-5 implementing Policy 2-8.</p>	<p>Gavin Feiger, Planning Commission Meeting, February 10, 2022</p>	<p>The City added more specific strategies or tools as options in Program 2-2 to address this comment:  <u>"Additional partnerships with large employers will be considered, such as:</u>  <ul style="list-style-type: none"> <li>•<u>Partnering with property management companies to provide employers notification and first right of refusal as units become available.</u></li> <li>•<u>Making the homebuyer programs available to employees.</u></li> <li>•<u>Providing financial assistance or other support to employees that initially need to rent upon relocation to the city."</u></li> </ul> <p>In addition, the City added a new Program 2-15 to seek funding to provide financial assistance to low-income renters in the city.</p> </p>
<p>One other missing program - Inclusionary Zoning and/or requirements. As we approve all of these market-rate units, it would be great to get a few affordable units too. I just saw that Truckee is considering an exchange of STR permits for deed-restricted units. Their language is "Town Council also directed staff to develop a program that would incentivize the private sector to contribute to workforce housing by setting aside a limited pool of short-term rental registration certificates. Potentially, a developer could approach the town to propose deed restricting one or more housing units for workforce housing in exchange for the ability to access an agreed-to number of short-term rental certificates."            While our STR situation is different here, I thought it was a creative approach to getting some affordable housing out the high-demand residential that is largely what is being proposed.</p>	<p>Gavin Feiger, Planning Commission Meeting, February 10, 2022</p>	<p>In response to this comment the City has revised Program 2-11 as follows:</p> <p>Program 2-11: Local Funding Source Feasibility Study and Linkage Program            The City shall conduct a feasibility study to explore local funding options to support affordable housing projects and programs. Examples of options to pursue include vacancy tax, housing transfer tax, sales tax, transient occupancy tax, linkage fees, impact fees, <u>inclusionary housing in-lieu fees</u>, and housing investment or trust funds...</p> <p>Due to restrictions on VHRs in residential areas and multi-family units a program to allow them in exchange for deed restricting units would require voter approval to modify regulations of Measure T.</p>
<p>Potential for workshop around GP Annual Report to discuss implementation of Housing Element each year.</p>	<p>Gavin Feiger, Planning Commission Meeting, February 10, 2023</p>	<p>In response to this comment the following program has been added to the Housing Element:</p> <p>Program 1-8: The City shall annually conduct a public workshop or public meeting to discuss progress on housing programs and to solicit feedback.</p>

## City of South Lake Tahoe Housing Element Update Response to Comments on Draft

Comment	Commenter	Response
Mobile home parks have high levels of poverty and poor conditions	Ed Mosur (public comment), Planning Commission Meeting, February 10, 2022	Comment included in the record. To respond to this comment, the City has revised Program 3-10 to add a new bullet as follows: "Work with HCD Mobilehome and Special Occupancy Parks Program to gather and maintain data on resident complaints, inspections and code violations."
Housing Element plans haven't come to fruition	Ed Mosur (public comment), Planning Commission Meeting, February 10, 2022	Comment included in the record.
Multi-family projects being subdivided as condominiums and becoming VHRs	Ed Mosur (public comment), Planning Commission Meeting, February 10, 2022	VHRs are prohibited in non-commercially zoned areas, but are allowed in commercially zoned areas which have been identified as appropriate for lodging and short term rentals through voter approval of Measure T.
TRPA policy needs to follow state law	Ed Mosur (public comment), Planning Commission Meeting, February 10, 2022	The Housing Element analysis acknowledges that some TRPA regulations are a barrier to the development of affordable housing. The City has included Program 2-8 in the Housing Element directing continued efforts to advocate for changes to TRPA regulations that would reduce these barriers.
Enforcement of formerly permitted VHRs, especially in multi-family properties, is needed	Ed Mosur (public comment), Planning Commission Meeting, February 10, 2022	In response to this comment, Program 3-7 has been revised as follows:  Program 3-7 MONITORING IMPACTS OF VACATION HOME RENTALS ON LONG-TERM RENTAL SUPPLY South Lake Tahoe voters approved Measure T in late 2018 to prohibit vacation home rentals in many areas of the city where they were previously allowed. Full implementation of Measure T began in 2021 when all existing vacation home rental permits in residential areas expired. The City <u>shall continue enforcement of Measure T regulations and</u> will monitor the effects of limiting vacation home rentals during the course of the Housing Element planning period as the impacts unfold after 2021. The City will report to the City Council on any identifiable impacts to the supply and cost of long-term rental housing by the end of 2023.
Acquiescence to realtors a big part of problem	Ed Mosur (public comment), Planning Commission	Comment included in the record.
Sites Inventory – Are low-income sites all high density multi-family?	Natalia Wiczorek, Planning Commission Meeting, February 10, 2022	The areas where lower income sites are identified are areas of the community with zones that allow for higher density development, which is more financially feasible for affordable housing development. HCD's Housing Element Site Inventory Guidebook (Memorandum dated June 10, 2020) identifies that zoning appropriate to accommodate low- and very low- income RHNA for must allow for a density of at least 20 units per acre and parcel size should be between 0.5 acre and 10 acres for affordable housing projects to be financially feasible.
Incentives for developers on high density parcels. Increased density or available coverage.	Natalia Wiczorek, Planning Commission Meeting, February 10, 2022	Mixed use and housing projects are incentivized in Town Centers through increased allowable land coverage and increased density. The City also provides incentives that allow affordable housing developers to obtain residential allocations, RUUs and land coverage rights from the City. Program 1-4 directs the City to provide more information regarding available incentives and Program 1-1 directs the City to continue to create incentives for mixed use and housing projects.

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Comment	Commenter	Response
Tiny Homes and ADUs considered affordable housing stock?	Natalia Wiczorek, Planning Commission Meeting, February 10, 2022	Pursuant to Government Code section 65400, an ADU or a tiny home may be used to meet either the lower-income or moderate-income RHNA if it meets the following criteria: 1.The unit meets the State’s definition of a housing unit. A housing unit is “a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant, is intended for occupancy) as separate living quarters. Separate living quarters are those in which the occupants live and eat separately from any other persons in the building and which have direct access from the outside of the building or through a common hall.” 2.The unit is reported to the California Department of Finance upon development. 3.The unit is assigned a price that fits within the HCD income limits for El Dorado County for either lower-income housing or moderate-income housing.
Since Tax map doesn’t show inequality that really exists does that affect the City’s ability to obtain funding?	Natalia Wiczorek, Planning Commission Meeting, February 10, 2022	In response to this comment, the following Program has been added to the Housing Element:  Program 2-14: The City shall participate in state processes to provide input on the TCAC Opportunity Areas mapping with the goal of improving the mapping accuracy in identifying low, moderate and high opportunity areas.
Public transit is not discussed in Housing Element – Housing and Transit are tied together.	Natalia Wiczorek, Planning Commission Meeting, February 10, 2022	Public transit, and associated mobility opportunities, are discussed in Section 4.2.6.2.2 of the Assessment of Fair Housing. Additionally, the City has included an action in Program 5-1 to meet biannually with the Tahoe Transportation District to assess if any new and unmet transit needs have developed and, if so, will provide assistance in applying for state and federal funding for expanded services. In response to this comment, the City has expanded Program 5-1 to include the following text regarding transit accessibility: <u>The City shall ensure that projects needed to develop infrastructure improvements to support housing and residents without vehicles will continue to be included in the City’s Capital Improvement Plan.</u>
Potential for program to address illegal VHR code enforcement	Natalia Wiczorek, Planning Commission Meeting, February 10, 2022	In response to this comment, Program 3-7 has been revised as follows:  Program 3-7 MONITORING IMPACTS OF VACATION HOME RENTALS ON LONG-TERM RENTAL SUPPLY South Lake Tahoe voters approved Measure T in late 2018 to prohibit vacation home rentals in many areas of the city where they were previously allowed. Full implementation of Measure T began in 2021 when all existing vacation home rental permits in residential areas expired. The City <u>shall continue enforcement of Measure T regulations and</u> will monitor the effects of limiting vacation home rentals during the course of the Housing Element planning period as the impacts unfold after 2021. The City will report to the City Council on any identifiable impacts to the supply and cost of long-term rental housing by the end of 2023.
Fire safety should be addressed or referenced to the Safety Element in the Housing Element	Keith Roberts, Planning Commission Meeting, February 10, 2022	In response to this and other comments regarding fire safety the City has included the following new policy in the Housing Element: Policy 3-8: City shall implement actions identified in Safety Element policies HS-2.1 through HS-2.8 for all housing development in the City in order to mitigate potential fire hazards and damage to structures in the event of a wildfire.

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Comment	Commenter	Response
City involvement in TRPA Working Group	Natalie Yanish, Contractor's Association of Truckee Tahoe (public comment), Planning Commission Meeting, February 10, 2022	In response to this comment the following revision to Program 2-8 has been made:  If not already addressed in the 2012 TRPA Regional Plan update and through the Tourist Core Area Plan, the City shall continue to advocate <del>recommend</del> for that TRPA make the following changes to TRPA regulations in order to reduce restrictions on affordable, workforce, and mixed-use housing developments. <u>The City shall use its representation as a voting member on the TRPA Governing Board and the TRPA Advisory Planning Commission and its participation in specific working group efforts such as the Tahoe Living: Housing &amp; Community Revitalization Working Group to advance the following changes to TRPA regulations: ...</u>
Incentives to builders to address housing needs are appreciated due to the cost of building in Tahoe	Natalie Yanish, Contractor's Association of Truckee Tahoe (public comment), Planning Commission Meeting, February 10, 2022	Mixed use and housing projects are incentivized in Town Centers through increased allowable land coverage and increased density. The City also provides incentives that allow affordable housing developers to obtain residential allocations, RUUs and land coverage rights from the City. Program 1-4 directs the City to provide more information regarding available incentives and Program 1-1 directs the City to continue to create incentives for mixed use and housing projects.
CATT is resource to provide technical advice on remodeling and upgrading existing housing	Natalie Yanish, Contractor's Association of Truckee Tahoe (public comment), Planning Commission Meeting, February 10, 2022	Comment included in the record.
There are many different types housing units being constructed. Sugar Pine Village as large scale with property management and ADUs as small scale examples. Each unit counts.	Natalie Yanish, Contractor's Association of Truckee Tahoe (public comment), Planning Commission Meeting, February 10, 2022	Comment included in the record.