

Town Council

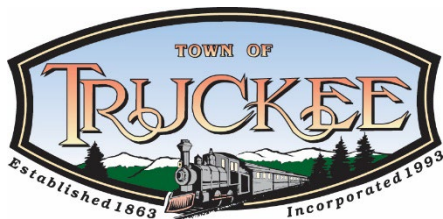
Lindsay Romack, Mayor

David Polivy, Vice Mayor

Anna Klovstad, Council Member

Jan Zabriskie, Council Member

Courtney Henderson, Council Member



Department Heads

Jen Callaway, Town Manager

Andy Morris, Town Attorney

Danny Renfrow, Chief of Police

Daniel Wilkins, Public Works Director/Town Engineer

Denyelle Nishimori, Community Development Director

Nicole Casey, Administrative Services Director

Judy Price, Communications Director/Town Clerk

Hilary Hobbs, Assistant to the Town Manager

January 26, 2023

Dylan Crosby
Tahoe Forest Hospital District
10121 Pine Avenue
Truckee, CA 96161

RE: Town of Truckee Application 2021-00000017 (Tahoe Forest Hospital Master Plan)

Dear Mr. Crosby:

Thank you for your submittal of the Tahoe Forest Hospital Master Plan (Town of Truckee Application #2021-00000017) on March 11, 2022. This letter has been prepared in response to your request for feedback from Town staff on the proposed project.

The proposed plan addresses future development within the Tahoe Forest Hospital campus area over an anticipated 20-year timeframe, including both short-range and long-range development projects. According to the submitted proposal, the project area includes a total of 40 existing parcels (APNs 018-570-058, 018-630-008 to -024, 018-650-004 to -006, 018-650-009 to -014, 019-460-022, 019-460-027 to -030, 019-460-042, 018-640-002, 018-640-007, 018-640-009, and 019-640-011). The 2025 General Plan land use designations for the parcels within the project area include Public Hospital/Office, Commercial, and High Density Residential, 16-18 Dwelling Units Per Acre. The existing zoning for the parcels within the project area includes PF (Public Facilities), CN (Neighborhood Commercial), CG (General Commercial), RM-15 (Multi-Family Residential, 15 Dwelling Units Per Acre), RM-18 (Multi-Family Residential, 18 Dwelling Units Per Acre), and RS-X (Single-Family Residential, No Further Subdivision).

The current proposal requests approval of the following land use entitlements:

1. **General Plan Amendment** to create a Public Hospital land use designation for all Tahoe Forest Hospital District (TFHD) parcels within the campus area and identify a TFHD Specific Plan within the General Plan with specific density and Floor Area Ratio (FAR) allowances;
2. **Zoning Map Amendment** to change the zoning within the TFHD Specific Plan Area;
3. **Development Code Amendment** for text changes to create deviations from certain development standards for the Specific Plan area;
4. **Specific Plan** approval;

10183 Truckee Airport Road, Truckee, CA 96161-3306

www.townoftruckee.com

530-582-7700 | email: truckee@townoftruckee.com

Printed on recycled paper.

5. **Development Agreement** approval;
6. **Development Permit** approval for three development projects with more than 7,500 square feet of floor area); and
7. **Vesting Tentative Map** approval to modify existing parcel boundaries.

Please note that approval of legislative acts (e.g., General Plan amendments, Development Code amendments, Development Agreements, Specific Plan/Master Plan adoptions) are not subject to the Permit Streamlining Act or the 30-day completeness timeframe.

Based on the information provided in the application submittal, staff has prepared the feedback below. In compiling these responses, staff considered many factors for successful development within the campus area. One of our primary roles is to pull guidance from the Town's various adopted plans and policies and to identify any potential conflicts. For this particular site, staff also referenced previously contemplated projects, current use of the site, design principles and Council priorities in an effort to assist with your understanding of all the planning issues and Town considerations.

The information contained in this letter is specific to the submitted land use application and subsequent processing. Staff acknowledges the prior work completed by the district to better understand how to plan for and meet patient and employee needs and understands the challenges the district is facing. Although there are differences in our perspectives which are outlined in this letter, there is no question that having a local hospital is a community benefit. The challenge for the Town's decision-makers will be how to balance need with land use compatibility and what appears to be an evolution of the hospital campus from a local-serving hospital to a regional hospital. It's unclear at this time what the community's overall interests are and how they want the Town Council to approach and manage this change.

Master Plan/Specific Plan/Development Code Amendment Processes

The application submittal requests approval of a Specific Plan for the hospital campus area. Based on the guidance provided in the OPR Guidelines, it appears that a Master Plan could potentially be a more appropriate document to address development within the campus area. A Master Plan typically covers a smaller, more localized area; includes zoning regulations and development standards; and falls under the umbrella of the General Plan. A Specific Plan combines a policy document (e.g., goals, policies and programs) with a regulatory document (zoning ordinance) and serves as a standalone planning document, replacing the General Plan and zoning ordinance for the Specific Plan area. Specific Plans are regulated by the State of California under Government Code Sections 65450-65457 and are required to include a number of components, including land use regulations and developments standards; a program of implementing measures; planned and needed public works projects to serve the Specific Plan area (essentially a capital improvement program); and financing measures necessary to implement the Plan and its recommendations. The Master Plan process could potentially provide a simpler path and would include adopting the separate Master Plan consistent with State law (by resolution), General Plan Amendment (by ordinance or resolution) and rezone (by ordinance).

Another option to consider would be to incorporate new zoning districts for the campus plan area into the Development Code rather than adopting a separate, standalone document. This would require amending into the Development Code to add new zoning districts, allowed land use tables, and development standards to address development within the campus area. This could provide a streamlined approach to creating new zoning and development standards specific to the areas within the hospital campus (for example, zones for hospital facilities,

parking structures, and housing). However, deviations from the Town's development standards would not be easily incorporated into the Development Code under this scenario. If deviations from the Development Code standards are requested, it may make more sense to have a standalone document with specific standards for the campus area. Please note that preparation of a standalone document would likely require hiring a consultant to create the document for the Planning Commission and Town Council's review and consideration.

Please review the above options and advise staff on which path is preferred by the applicant team so that staff can provide more detailed information on the required approval process.

Development Agreement

The application submittal indicates that a Development Agreement is requested. However, it is unclear what the purpose or need for a Development Agreement would be. If the interest is in locking in development standards, that could be accomplished through adoption of a Master Plan. Staff would need additional information on the proposed agreement in order to evaluate what is proposed. The Development Agreement should be presented as a detailed proposal for the Town to review in order to determine if it would be consistent with the Town's practices for such agreements. The proposal would need to identify exactly what standards are proposed to be waived or modified, as well as what benefit the Town would receive from entering into such an agreement.

Development Permit Submittal

The application submittal references that Development Permit approval is requested for three development projects as part of the campus plan application; however, a Development Permit submittal was not included in the application package. If the intent is to submit the Development Permit applications for concurrent processing as part of the campus plan review, please refer to the Development Permit information sheet and submittal checklist on the Town's website and ensure that all submittal requirements for these projects have been met (available at <https://www.townoftruckee.com/government/community-development/planning-division/application-forms>).

Construction of a parking garage on Levon Avenue is identified as one of the short-range development projects in the current submittal. A Development Permit application for the parking garage project was submitted as a separate project to the Planning Division on November 14, 2022 (Town of Truckee Application #2022-00000138). As noted in the incomplete letter issued by Town staff on December 13, 2022, in order to process the Development Permit as a standalone land use entitlement, the project would require submittal of a rezone application and possible Development Code Amendment in order to allow the proposed use of the project site. Additionally, in order to comply with current State housing laws, if the project site is proposed to be rezoned, the residential density would need to be accommodated on another site within the Town of Truckee under the "no net loss" provisions of State law, which may require an additional rezone of the proposed new housing site to accommodate the additional residential density and potentially a General Plan Amendment depending on the current land use designation of the new housing site. Staff requested that the applicant team clarify what is proposed in terms of any changes to the existing zoning districts and land use designations as part of the parking garage project, and whether the intent was for the Development Permit application to be processed concurrent with the Master Plan application. If so, staff noted that the current Development Permit application would be closed out, and the land use entitlement would be added with the Master Plan application submittal and processed as a single application. Please advise how the applicant team would like to proceed with this land use entitlement.

Tentative Map Submittal

The application submittal requests approval of a Vesting Tentative Map to modify existing parcel boundaries within the campus area. A plan sheet showing the proposed parcel configuration (Sheet G1.2) was included in the submittal and appears to show that a total of 11 parcels are proposed; however, it does not appear that a Vesting Tentative Map submittal was included in the application package. If the intent is to submit a Vesting Tentative Map application for concurrent processing as part of the campus plan submittal, please refer to the Vesting Tentative Map information sheet and submittal checklist on the Town website to ensure that all submittal requirements have been met (available at <https://www.townoftruckee.com/government/community-development/planning-division/application-forms>).

Please note that Development Code Section 18.96.120 (Vesting Tentative Maps) requires an application for a Vesting Tentative Map to include detailed information on the proposed development on each parcel on the map, including accurately drawn floor plans/building footprints and architectural elevations for all buildings and structures intended to be constructed on the property after subdivision. The required findings for a Vesting Tentative Map state that approval of the map shall not be granted unless the review authority first determines that the intended development is consistent with the zoning regulations applicable to the property at the time of filing, in addition to all other findings required for Tentative Map approval under Development Code Section 18.96.060 (Tentative Map Approval or Denial). Due to the fact that only three of the development projects within the campus plan area are identified for approval as part of the campus plan application process, it does not appear that the criteria to qualify for a Vesting Tentative Map would be met. A simplified Tentative Map exhibit showing the proposed parcel boundaries should be submitted as part of a Tentative Map application, along with all required information on the Tentative Map submittal checklist, if the purpose of the map is to create new parcels that will allow for future development within the plan area, including for the long-range development projects identified in the applicant justification letter.

Proposed Zoning Designation

The current campus plan proposal includes rezoning the entire Specific Plan area to PF (Public Facilities). Since the PF zoning district does not include housing as an allowed use, a Specific Plan Overlay is proposed that would allow workforce housing and senior citizen housing up to a density of 24 dwelling units per acre. Based on staff's understanding of State law, rezoning a residential property to a zoning district that does not allow housing would be considered a downzone. It is unclear whether applying an overlay to allow housing density to those parcels would be sufficient to address the "no net loss" provisions of State law, which are related to the underlying zoning of a parcel. A better option may be to recreate a "hospital housing" zoning district for parcels within the campus plan area that are envisioned to be developed with housing, with specific residential densities identified for the parcels. Please note that the current allowed density of the Upper McIver site is 18 dwelling units per acre, which was the residential density approved by the Town Council through a rezone in order to meet to Truckee's housing allocation requirements under State law. This amount of density was already an increase from the previous allowed density of 12 dwelling units per acre. This site has a number of constraints (including steep slopes and scenic corridor proximity) that could create challenges for development. Based on these constraints, and the previous discussions with the Town Council and community about the appropriate amount of development for the site, it is unlikely that staff would recommend adding additional density to the Upper McIver site. More research and possible discussions with the State of California

Department of Housing and Community Development (HCD) may be needed to understand the pros and cons of these options and determine which approach would be the most consistent with current State law.

Housing Allocation

As previously noted, State law prohibits a downzone of residential properties which would result in a net loss of housing density. The current proposal includes a rezone of the RM-15 parcels on Levon Avenue (APNs 019-460-027 and -028) to allow construction of a parking garage for hospital staff in that location. In order to avoid a net loss of housing, the removal of the housing density in the existing RM-15 zone and replacement of the 16 units that were already demolished in that location would need to be addressed. The current application identifies construction of 10 workforce housing units on Lake Avenue as one of the short-range development projects, with project-specific approval of this project proposed as part of the campus plan entitlements. However, these 10 units fall short of the 16 units that were already demolished on Levon Avenue, and the demolition of the existing single-family residences on Lake Avenue that would need to occur in order to accommodate the 10 new housing units would also need to be addressed. The timing for the workforce housing construction will need to be resolved in order to ensure compliance with State housing laws and would likely require a concurrent project approval for construction of replacement housing units along with any proposed rezone of the existing residential parcels within the campus plan area. A land use application for this housing project has not been submitted concurrent with the campus plan submittal. Please advise how these issues are intended to be addressed. Please also advise whether the existing residential parcels on Lake Avenue identified for redevelopment in the current submittal are under the ownership of TFHD.

Skilled Nursing Facility Use

The current application proposes a “Senior Citizen Housing and Skilled Nursing/Assisted Living (memory care, custodial care, skilled nursing care) facility” with a residential density of up to 24 dwelling units per acre on the Upper McIver parcel. This site is currently zoned for residential uses at a density of 18 dwelling units per acre. As noted in the “Proposed Zoning Designation” section above, staff would likely not recommend approval of additional density on the Upper McIver site due to the site constraints and prior discussions with the Town Council and community about the appropriate amount of development for that site. Under the Development Code definitions, a skilled nursing facility falls under the definition of “Medical Cares – Extended Care” definition, which includes board and care homes, convalescent and rest homes, extended care facilities, and skilled nursing facilities. This is identified in the allowable land use tables as a commercial use, and is not an allowed use within the Town’s residential zoning districts. In order to allow this use on the Upper McIver parcel, “Medical Services – Extended Care” would need to be added to the allowed uses within the zoning district allocated to that site through the campus plan and/or Development Code amendments to the allowed use tables, depending on whether a standalone document is adopted or the development standards and allowed uses for the campus plan area are incorporated into the Development Code. In previous discussions with the applicant team, TFHD’s attorney indicated that follow-up information would be submitted in support of considering the skilled nursing facility a residential rather than a commercial use in order to avoid a net loss of housing under State law. If this information is available, please provide it for staff’s review. With a density of 18 dwelling units per acre, the only way to achieve a density of 24 dwelling units per acre would be through a density bonus; however, it is unclear whether a skilled nursing facility use would qualify as a residential use under State density bonus law.

Proposed Development Standards

Under the current campus plan proposal, a number of proposed development standards are identified which appear to deviate from current Town standards. These include site coverage, floor area ratio (FAR), height, setbacks, drainage and stormwater, snow storage, undergrounding of utilities, hillside development, landscaping, parking, bicycle parking, signs, and workforce housing, as discussed below.

- **Site Coverage** – The current campus plan submittal proposes up to 80 percent site coverage for the overall campus plan area. Site coverage is calculated on a per-parcel basis; therefore, staff will need to understand what site coverages are proposed for the new proposed parcels and zoning designations. Different site coverages could be appropriate depending on the proposed uses within the zoning designations. For example, a “hospital housing” zone would likely have different site coverage allowances than a “hospital parking garage” or “hospital medical services” zone. Generally, commercial zones are allowed greater flexibility in terms of site coverage than residential zones. For reference, under the Town’s current development standards, 50 percent maximum site coverage is allowed for residential properties in the RM zoning district, whereas 70 percent maximum site coverage is allowed for a number of commercial zones (CG, CN and CS) and no maximum site coverage is identified downtown properties in the DMU zoning district. The proposed site coverages should be appropriate for the types of uses proposed within each zone.
- **Floor Area Ratio (FAR)** – FAR is a topic which has been discussed as part of the 2040 General Plan process, including discussions about what the appropriate amount of FAR should be allowed for the Gateway area. Under the draft 2040 General Plan, the FAR calculation would include both residential and commercial square footages. The proposed 1.25 FAR for the overall campus area and 2.0 FAR for parking garage structures may not ultimately coincide with the amount of development that the Planning Commission and Town Council decide are appropriate for the Gateway area. Similar to the “Site Coverage” discussion above, FAR is calculated on a per-parcel basis; therefore, the campus plan should identify specific FAR allowances for the different zones within the campus area. A higher FAR could be appropriate for some zones (for example, parking garages) than other uses (such as residential development); however, it is unclear at this point what amount of development the Commission and Council will support. The faster the requested information can be turned around and staff has everything it needs to review, the sooner we will be able to outline the process moving forward.
- **Setbacks** – The current submittal proposes 8’ front yard, 5’ side yard and 0’ rear yard setbacks within the campus plan area. Similar to the above comments related to site coverage and FAR, the proposed setbacks should be tailored to reflect the types of development proposed within each campus zone. For example, the setbacks that would be appropriate for residential development would likely be different than would be required for a parking garage or medical services zone. For reference, standard setbacks for residential properties in the RM zoning district are 20’ front yard, 10’ side yard, 15’ street side and 20’ rear yard, whereas no standards setbacks are required for commercial properties in the CS, CCG and CH zoning districts. Different setbacks could also be appropriate based on the location of a proposed project (for example, in relation to a public street rather than along property lines between parcels on the interior of the campus area).
- **Height** – The current submittal proposes a maximum height of 57 feet within the campus plan area. Under the Development Code development standards, a maximum height of 35 feet for residential properties and 50 feet for commercial properties (or 3.5 stories, whichever is less) is allowed. Proposed heights should reflect the type of

development proposed within each campus zone to align with the type of development proposed. For example, the appropriate height for residential uses would likely be different than for commercial uses. It is unclear whether additional height would be supported by the Town decision-makers. It may be an easier path to request additional height for specific buildings where the additional height is necessary in order to meet medical use construction requirements, rather than asking for an increased height limit throughout the overall campus plan area. Please also note that portions of the campus area are located within the Interstate 80 Scenic Corridor as identified in Development Code Chapter 18.46.080 (Scenic Corridor Standards), which limits height on structures within 100 feet of the I-80 right-of-way to 25 feet. These height restrictions should be taken into consideration when proposing additional height within the campus area. Please review the development standards that apply to structures within scenic corridors in Section 18.46.080.C (Development Standards) to understand the restrictions on development within these areas.

- **Circulation** – Town Engineering is generally in support of the current submittal that proposes to abandon Pine Street and reconfigure the site circulation on the south side of Donner Pass Road (DPR) to provide access to the proposed parking lots and new uses. The reconfigured circulation will tie into Donner Pass Road by way of a proposed roundabout, which the design, permitting, and construction of will need to be coordinated directly with the Town and will require appropriate right-of-way limits dedicated to the Town by TFHD prior to implementation. Most of the proposed driveways on the north side of DPR share centerlines with driveways and/or side streets along the south side of DPR, which is consistent with the direction previously provided by the Town. However, there is a single driveway proposed on the north side of DPR on the far west side of the project site that may need to be relocated/removed in order to meet typical Town standards of sharing centerline or a minimum distance of 150' apart from opposite driveways/side streets on the south side of DPR (i.e., distance from Sierra Avenue). Consider obtaining a shared driveway with APN 018-570-063 to align with Sierra Avenue to the south or an alternative circulation element to meet Town standards for encroachments.
- **Frontage Improvements** – The project applicant should provide further consideration and information to the Town regarding the applicant's proposed design for frontage improvements along the roadways within the campus. The currently proposed plans do not clearly show details (dimensions, materials, 7' clear path of travel) of frontage improvements, including sidewalks, transit stops, on-street parking, protected crosswalks, streetscape furniture/amenities, public art, and any other necessary improvements. Frontage improvements will need to be consistent with the Town's Envision DPR project for this area and the extents of the frontage improvements will be reviewed and approved by the Town Engineer prior to Building permit issuance. They are also an important component of defining the Master Plan.
- **Drainage and Stormwater** – In previous discussions with the applicant team, Town staff identified that the proposed campus plan includes a significant amount of impermeable surfaces, such as parking areas, and that accommodating the required amount of snow storage, stormwater treatment areas, etc. may be challenging. These areas must be sized appropriately to meet the minimum dimensions required in the Development Code; small pockets of space do not adequately address the needs of a project of this scale, and low impact design areas are hard to implement in practice. To date, the applicant team has done a good job of implementing feedback from the Engineering Division in providing a comprehensive storm drain plan (Sheets C3.0-C3.2), which provides stormwater conveyance by way of sized culverts and intersystem LID features (Stormtech chambers) to treat stormwater prior to safe

release back into the public storm drain system. It's worth mentioning that the Engineering Division has not thoroughly reviewed a Drainage Report for the campus and the proposed plan should be considered a conceptual layout for the campus. A comprehensive final drainage report should be provided to the Town for review for consistency with Town stormwater requirements, including, but not limited to: the requirement to treat all existing and future impervious surface areas since the future/reconfigured impervious surface area is greater than 50% of the existing impervious surface area, to implement additional LID features beyond the proposed chambers, and to ensure that stormwater leaving the site is being conveyed within legal easement/right-of-way in the vicinity of the campus (i.e., confirming drainage easements on APNs 019-460-025, 018-630-003, and 019-460-024). The campus will trigger the requirement to treat all impervious surface areas when development/redevelopment reaches 50% of the existing impervious surface area. The proposed phasing plan for the storm drain/treatment system appears to accommodate that type of incremental approach, but the applicant team should confirm that the entire campus stormwater treatment/conveyance system can be constructed at any time to meet the Town requirement of treating all existing impervious surfaces when it is triggered. Worth noting, the current submittal identifies Development Code Section 18.30.050 (Drainage and Stormwater Runoff) as one area where the project may not comply with current Town standards. It is unclear what deviations are requested, and whether the "incremental improvements" mentioned are intended as a phased approach to bring the campus plan area into compliance with Town standards through a phased approach. Additional clarification on this topic is needed in order for Town staff to evaluate the proposal and provide feedback on whether the proposed approach would be supported by staff.

- **Snow Storage** – The current submittal identifies that a Snow Storage and Management Plan for the entirety of the campus plan area is proposed. Staff notes that a comprehensive snow storage/removal plan was previously approved for the hospital campus. Sheet SS1.1 shows the "Short Range" plan for snow storage, which does not appear to be consistent with previously approved plans for the campus in that it does not include a majority of the existing parking lots on the campus. Please revise to include all the existing parking lots and any new AC paving being considered as part of the "Short Range" plan. Sheet SS4.1 shows the "Long Range" plan, which appears to be comprehensively thought out with snow storage areas provided all around the campus (rather than one large designated area, which is less ideal). However, it is unclear if all the snow storage areas identified meet the Development Code standards such as, 10' minimum in all directions, minimal obstructing vegetation such as trees, and easily accessible (i.e., no curbs or other vertical obstructions). In addition, there is a portion of the snow storage shown along the southern property boundary that appears to be on Caltrans right-of-way. Please provide zoomed in views of each snow storage area with pertinent information that confirms each is located entirely on the TFHD property and that each area meets all Development Code requirements for snow storage areas. It would be helpful to understand how the current proposal is consistent with the previous plan, and in what areas changes would be required. The Town's Engineering Division will need to review the proposed campus snow storage/removal plan to determine if it meets current Town requirements.
- **Undergrounding of Utilities** – Under Development Code Section 18.30.160 (Undergrounding of Utilities), all electric, telecommunications and cable television lines to be installed on a site to serve a proposed development are required to be installed underground; new poles or overhead lines are not allowed. In addition, any existing overhead utilities along DPR will be required to be undergrounded as part of

development along the corridor. Undergrounding may occur in several ways including, which may include: (1) incrementally as approved by the utility providers, (2) the entire TFHD campus frontage on DPR pursued by TFHD by way of an encroachment permit with the Town, or (3) as part of a cost-sharing approach with a Town project where TFHD would pay its fair-share of the costs to underground the existing overhead utilities along the TFHD campus frontage along DPR. It is unclear from the description in the applicant justification letter whether the project proposes to comply with the Development Code standards. Please advise staff if deviations are requested.

- **Landscaping** – The current submittal states that the applicant team proposes to comply with the current landscape requirements for the PF zoning district. Please note that the PF zone does not have specific landscaping requirements. The Town’s landscaping requirements are provided in Development Code Chapters 18.40 and 18.42. If deviations from these standards are requested, please identify that information for staff to evaluate.
- **Parking** – The current proposal identifies that the amount of proposed parking “generally aligns” with Town requirements, including those of the PF zoning. Please note that the PF zoning district does not have specific parking requirements; rather the Development Code parking demand calculations are based on use, as identified in Development Code Chapter 18.48 (Parking and Loading Standards). It is unclear what deviations from the Town’s parking standards are requested. It would be helpful to understand where the parking counts are coming from, how the amount of proposed parking compares to the existing parking, and whether the applicant team has information from LSC Transportation Consultants to support the need for the amount of proposed parking. During the approval of the Cancer Center project in 2010, TFHD prepared a parking study which determined that the parking demand at that time was 457 parking spaces, and that with implementation of carpooling strategies and use of the Town right-of-way for parking, the parking supply count was 454 parking spaces, which was identified as adequate to meet future buildout within the hospital campus. Based on recent conversations between Town staff and TFHD, the employee counts have doubled since approval of that project; therefore, it appears that the hospital campus may be currently out of compliance with the previously approved parking management plan. As part of the campus plan project, staff will need to determine how to best address this growth within the campus plan area.
- **Bicycle Parking** – The current submittal identifies that bicycle parking is proposed to be improved within the campus area and that five percent bicycle parking is proposed for the parking structures. Please note that this amount of bike parking does not comply with the current Development Code requirements in Section 18.48.090 (Bicycle Parking and Support Facilities). The current standards require 15 percent bike parking for non-residential projects and specific bike parking requirements for residential projects. Due to the fact that this is has been a topic that has been of recent interest to the Commission and Council, particularly in terms of how it relates to the Town’s overall sustainability goals, staff recommends meeting or exceeding the current Development Code standards for bicycle parking.
- **Off-Street Loading Spaces** – The current submittal requests deviations from the Town’s requirements for off-street loading space requirements, with a request for one parking stall (9’x20’) to be striped in front of each building on campus for 15-minute van loading/delivery. Staff will need to better understand the operations of these buildings to determine whether waiving these requirements would be appropriate. The Town does not support the use of public parking spaces in the right-of-way for private uses such as dedicated loading/unloading/waiting. TFHD should consider options for

those types of private use spaces within the campus and outside the Town right-of-way.

- **Hillside Development** – The current proposal requests approval of deviations from the Town’s hillside development standards as required under Chapter 18.36 (Hillside Development Standards). The submittal mentions seeking a variance to allow development in slopes that exceed 30 percent, and notes that the majority of such slopes that impede the construction areas of site are a result of previous site grading for parking and drive aisles. Please note that this is an area that tends to be controversial and could be of concern for the Commission, Council and community members. In reviewing a past application for hospital parking lots, the Commission expressed concerns with the proposed hillside disturbance on the north side of Donner Pass Road. While deviations can be requested, it is unclear whether the review authority would support such deviations.
- **Signs** – The current submittal mentions that a separate “signage package” will be submitted at the completion of the campus plan process. It is unclear whether this is intended to be a Comprehensive Sign Plan for the campus area. Additional information is needed to evaluate this proposal. Including direction on signage for the campus plan as part of the plan may be more appropriate if the goal is to comprehensively plan signage for the plan area. The campus plan should address future signage approvals within the plan area, including proposed standards for future signage.

At this point, it is unclear which deviations would be supported by the Town decision-makers. While deviations can be requested, the more consistency with current Town standards that could be achieved would likely create a smoother review process and less potential for concern that the proposed plan is not consistent with the Town’s overall goals and standards.

Workforce and Inclusionary Housing

Another issue that will need to be addressed is the additional housing demand that would be created by the proposed development. In order to evaluate this, staff will need to review an affordable housing plan, which should include a study on how the affordable housing demand for the institutional uses has been calculated, as well as information on what types of restrictions would be placed on the housing units to ensure that they are meeting the needs of the local workforce. Additionally, the timing of construction for any workforce and inclusionary housing units should be identified to ensure that the timing complies with the Town’s requirements under Development Code Chapter 18.210 (Affordable Housing Controls), Chapter 18.214 (Inclusionary Housing) and Chapter 18.216 (Workforce Housing). The current campus plan identifies that the 10 housing units proposed to be constructed on Lake Avenue would be a first phase of a plan to “incrementally develop” workforce housing. A campus-wide solution could potentially be appropriate to address the overall housing demand for the proposed development; however, staff would need more information on the demand that will be created and how it is proposed to be addressed in order to provide feedback on this topic.

Intensity of Development Proposed

As noted in previous discussions between Town staff and the applicant team, it is unclear how the community and decision-makers will view some elements of the proposed development, in particular the proposed building heights and overall density/intensity of development proposed. The amount of development envisioned in the current campus plan would be a significant change for the Gateway area, and could create concerns among the community and Town decision-makers. It appears that there is some community interest in creating

boundaries for the campus area to ensure that future growth does not continue to expand beyond those limitations, but it is unclear whether the proposed plan would adequately address those concerns about future growth. While staff notes that TFHD has done some outreach to the community in preparing its plan, this outreach primarily focused on services rather than development impacts. One topic of conversation which will likely be discussed as part of the plan review process is whether the Truckee community has the desire and capacity to serve as a regional hub for medical services for the surrounding counties, rather than focusing on providing services for the local community, potentially with satellite facilities in other areas which could reduce the need for Truckee to absorb all of the impacts of providing these types of services in one centralized location. Feedback from the Town Council as part of the 2040 General Plan process indicated that there will need to be further discussions about this topic in order to determine what the community, Planning Commission and Town Council will ultimately support. Additional community input will be needed to evaluate the tradeoffs between expanded medical services and development impacts in order for staff to provide feedback on this topic.

Environmental Review

According to the Notice of Preparation (NOP) dated November 16, 2021, TFHD is the lead agency for preparation of an Environmental Impact Report for the campus plan. The Notice of Preparation scoping review period ended on December 15, 2021. Please advise staff on the current status/timeline of the environmental document preparation. Please also note that depending on the timing of when the campus plan adoption moves forward, additional analysis may be required based on the 2040 General Plan to ensure consistency with the General Plan in place at that time.

Vehicle Miles Traveled (VMT)

As part of the environmental analysis, one area that will need to be considered is Vehicle Miles Traveled (VMT) to ensure compliance with State law and local requirements. The campus area is not exempt from VMT analysis under the Town's current thresholds of significance, and there is not currently a mitigation plan in place to address impacts of a project that are identified through a VMT analysis. If a significant impact is identified, adoption of a Statement of Overriding Considerations would be required. As lead agency, this would be TFHD's decision to make. However, it is unclear whether this action would be consistent with the Council's direction related to VMT reduction and the Town's overall focus on sustainability.

Sustainability Initiatives

Another priority for the Planning Commission and Town Council, which would likely factor into their review of a proposed campus plan, is sustainability. Areas of interest will likely include green building, zero net energy, and alternate transportation. It is unclear whether these types of sustainability initiatives will be addressed as part of the campus plan or the requested legislative acts/land use permits. Staff recommends taking this topic into consideration in terms of how the campus plan can be consistent with Town goals and priorities for sustainability.

Entitlement Timeframes

As noted above, legislative acts (e.g., General Plan amendments, Development Code amendments, Specific Plan/Master Plan adoptions) are not subject to the Permit Streamlining Act or 30-day completeness timeframe. Likely a campus plan application would require adopting a Master Plan (by resolution), General Plan Amendment (by ordinance or resolution) and rezone (by ordinance). While land use entitlements for specific development projects could be processed and reviewed concurrently, please be advised that the effective date for

the land use entitlements would have to occur after the referendum period on the Master Plan adoption has ended (generally 30 days). It is also possible that in reviewing the Master Plan, the Commission and Council feedback could trigger required updates to the proposed development applications in order to ensure consistency with the campus plan that is ultimately approved. This could add time and cost to the process. Another alternative would be to move forward with the campus plan adoption separate from the development application review, so that when the development applications are submitted, there is a greater degree of surety about what the campus plan will ultimately include so that the development projects can be tailored to the adopted requirements. These timing and cost components are something to consider in terms of how to move forward with processing the campus plan and land uses entitlements.

Next Steps

Once the above questions and requests for additional information have been addressed, staff will route the project for review and comment by the Town departments and outside agencies and special districts. Copies of all comment letters received will be forwarded to the applicant team for review so that any changes to the plan that would be required based on agency requirements can be addressed.

The hospital campus area is an important site within the Gateway area and within the broader context of the Truckee community. The right mix of uses at this location could enhance medical services for the community to address existing and future needs while ensuring that growth within the campus area is consistent with other Town goals, including providing housing that is affordable to the local workforce, achieving the Town's green building and sustainability goals, and ensuring that the size and scale of development is consistent with Truckee's community character. Our staff will continue to work with you on developing a concept for this site which will ensure that the proposed project is consistent with the vision of the General Plan, meets other Town goals and policies, and addresses the community's expectations for future development in Truckee.

If you have any questions, please feel free to contact me at (530) 582-2937 or by email at LDabe@townoftruckee.com.

Sincerely,



Laura Dabe, AICP
Associate Planner