

Date: September 13, 2022

Subject: Land Use Study Update Report

*Purpose: This report is issued pursuant to California Government Code Section 65858(d) to summarize the measures the Town of Truckee has taken since the adoption of urgency Ordinance 2022-06 to alleviate the conditions which led to the adoption of this ordinance.* 

The Town of Truckee is undertaking a study of three land uses proposed to be prohibited under the 2040 General Plan (gas stations, mini-storage facilities, and single retailers with more than 20,000 square feet of gross floor area). This study will inform Town Council's consideration of the draft General Plan policies and action items related to these land use prohibitions.

Thus far, the Town has taken the following steps in relation to the proposed land use prohibitions:

- The proposed prohibitions were first presented as a concept at the June 9, 2022 community workshop, including the written handouts. These prohibitions were based on decision-maker feedback and public input gathered throughout the duration of the General Plan Update process which commenced in November 2018.
- The proposed prohibitions were identified at the June 16, 2022 GPAC meeting, including the written material.
- The proposed prohibitions were presented in the staff report for the Council/Commission Joint Session on June 12, 2022.
- The proposed text was published in the June 2022 Draft 2040 General Plan which was released June 3, 2022 and has been available for public viewing on Truckee2040.com.
- Public comment has been accepted as part of the community workshop, public hearings and public review draft release of the draft 2040 General Plan.

In addition to the above discussions, staff has prepared the following report with additional information on the proposed land use prohibitions to assist the Town Council with its future General Plan deliberations. The following information is not intended to be comprehensive, but rather to provide additional background information and initial data to provide additional context for the upcoming General Plan discussions.

### I. Gas Stations

An inventory of the existing gas station facilities in Truckee completed by Town staff identified seven gas stations that are currently operable within the Town limits and one that is currently

inoperable, along with several nearby gas stations located outside the Town boundary on Donner Summit and at Hirschdale:

- Fastlane (State Route 267)
- Beacon & 76 (Downtown Truckee)
- Shell (State Route 89 South)
- Flyers (West River Street)
- Shell and Chevron (Donner Lake) plus 76 (currently non-operational)
- Truckee River RV (Hirschdale)
- Donner Summit Gas and Shell (Soda Springs)

For the sake of comparison, there are two gas stations in the North Lake Tahoe area (one in Tahoe City and one in Incline Village).

Below is a map showing the locations of the gas stations in the Truckee/North Lake Tahoe area. As shown on the map, the majority of the gas stations are clustered along the main transportation corridors through Truckee (along the I-80/Donner Pass Road corridor and along State Route 267 and State Route 89 South):



Based on an analysis of driving distances within the Town limits, the majority of parcels within town are located within five miles of an existing gas station, with a few parcels (for example, on Skislope Way in Tahoe Donner) located within six miles of an existing gas station.

### Potential Gas Station Development

Under the current Development Code, construction of new gas stations would be allowed in the following zoning districts with the following permit requirements:

- **Permitted use** with approval of a Zoning Clearance by the Community Development Director in the CN (Neighborhood Commercial), CG (General Commercial), and CS (Service Commercial) zoning districts.
- **Conditionally allowed use** with approval of a Use Permit by the Planning Commission in the CH (Highway Commercial), DC (Downtown Commercial) DM (Downtown Manufacturing) zoning districts.

Staff processed a Preliminary Application in 2021 for a new gas station on Deerfield Drive. As part of the review, staff noted that while a service station and convenience store may be uses that are typically appropriate for a site in the CH (Highway Commercial) zoning district, the location of the site at the confluence of two creeks could create concerns regarding potential impacts to the adjacent waterways and floodplain. The location of the project site in relation to Cold Creek and Donner Creek is shown in the map below:



A new gas station was also proposed as part of the Village at Gray's Crossing project in 2017; however, the developer did not move forward with the gas station as part of the project due to neighborhood opposition to the gas station use.

### Discussion on Gas Station Densities

The BAE Urban Economics report that was completed in January 2020 as part of the 2040 General Plan process identified a potential need for two future gas stations in Truckee. This

analysis was based on projected demand through the General Plan planning horizon of 2040 rather than on current demand for additional gas stations or identification of where additional gas stations might be a need in a particular area of Truckee.

The Preliminary Application Review application for the new gas station on Deerfield Drive proposed the new facility in the vicinity of the following existing gas station facilities: a Chevron station on the opposite side of Deerfield Drive, within approximately 100 feet of the project site, a Shell station on the far side of Interstate 80, within a half mile of the project site, and third gas station site located across Coldstream Road (a former 76 station, which is currently non-operational but could be redeveloped through a reactivation of use). The Village at Gray's Crossing project proposed a new gas station facility on Highway 89 North, approximately 1.3 miles from the two Downtown gas stations (76 and Beacon), and approximately 2.2 miles to the Fastlane gas station on Highway 267.

As an alterative to a ban on future gas stations, the Council could also discuss having locational criteria in place for any new gas stations and disallowing any new stations within a certain distance from one another if the Council thinks this would reduce VMT associated with cars getting to a gas station and having these facilities more spread out in town. However, this conversation would need to occur as part of the General Plan Update process.

### Projected Gas Station Demand

As noted above, the 2020 BAE study anticipated that based on development projections for future buildout, Truckee could experience demand sufficient to absorb two additional gas stations. However, as noted above, these projections were based on anticipated buildout within the 2040 Planning horizon rather than reflecting current demand. At the time the study was completed, the 2040 General Plan land use alternatives had not yet been developed. The BAE study identified a reduction in visitor-based retail sales for both motor vehicle and parts dealers and gasoline stations (from \$45,251,902 in 2018 to \$23,334,883 in 2040).

Another factor in analyzing future gas station demand are the actions that have been taken in California related to transitioning to the zero-emission vehicle market. In August 2022, the California Air Resources Board (CARB) signed off on a plan requiring that by 2035, all new passenger cars and light trucks sold in California are required to be electric vehicles or other emissions-free models. As noted by the CARB in a press release on August 25, 2022, the new rule "sets California on a path to rapidly growing the zero-emission car, pickup truck and SUV market and deliver cleaner air and massive reductions in climate-warming pollution" (https://ww2.arb.ca.gov/news/california-moves-accelerate-100-new-zero-emission-vehicle-sales-2035).

The ban on the sale of gasoline powered vehicles in California in 2035 coupled with the increasing popularity of electric vehicles will likely result in a different demand for future gas station services. Across the United States, the number of public fueling sites has been reduced from 170,000 to 100,000 over the past two decades, and the number continues to decline as gas stations become less profitable amid a national push for more sustainable mobility options like electric vehicles. If EVs dominate the automobile market, up to 80% of gas outlets could become unprofitable by 2035. according to estimates from the Boston Consulting Group (https://www.bcg.com/publications/2019/service-stations-future).

Another consideration in whether to approve new gas stations is the cleanup of a site that would be required if the gas station becomes unprofitable. The financial cost of cleanup can be millions

of dollars in some cases. According to the Environmental Protection Agency, approximately half of the 450,000 brownfield sites in the United States—sites containing hazardous substances, pollutants or contaminants—are properties compromised by the presence of petroleum, much of it leaking from old gas stations (<u>https://www.epa.gov/brownfields/understanding-brownfields</u>). Leaks and abandoned sites pose environmental risks to cities by contaminating the air and drinking water supply to surrounding neighborhoods.

The environmental and health impacts of new gas stations during operation of the facility is another consideration. Underground storage tanks can impact soil and groundwater and emissions and other fumes pollute the air. According to a 2018 study from Columbia University and Johns Hopkins University, gas stations release far higher levels of known carcinogens like benzene than estimates from industry-wide risk assessments (https://www.publichealth.columbia.edu/public-health-now/news/gas-stations-vent-far-moretoxic-fumes-previously-thought). Separate studies have found that children who live near gas stations have elevated risk of childhood leukemia (https://academic.oup.com/aje/article/185/1/1/2631401). The fossil fuel industry also has long situated stations and refinery operations in socioeconomically disadvantaged neighborhoods and communities of color exacerbating health impacts on already vulnerable people.

## Gas Station Bans

As part of their climate action planning, a number of California cities have taken action to ban future gas stations. In March 2021, Petaluma became the first city in the nation to enact such a ban when the City Council voted unanimously to prohibit the creation, expansion, reconstruction and relocation of gas stations. The gas station ban is part of the city's goal of becoming carbon neutral by 2030. According to the United States EPA, every gallon of gasoline burned adds 8.887 grams (20 pounds) of carbon dioxide to the atmosphere (https://www.epa.gov/greenvehicles/greenhouse-gas-emissions-typical-passenger-vehicle). In 2019, Americans consumed 142 billion gallons of gasoline, producing 1.4 billion tons of CO<sub>2</sub>.

Rather than being viewed as a solution to the climate change issues, the ban is seen as a first step toward a greener future, with the idea that future next steps should include more charging stations, cheaper electric vehicles, better public transportation, and more bikes. The ban is also viewed as an environmental justice issue in terms of addressing the impacts of the oil industry, including oil spills, extraction, refining and storage. To encourage owners to transition to stations that serve electric and hydrogen-powered vehicles, the Petaluma City Council streamlined the process for existing gas stations who want to add electric vehicle charging stations plus hydrogen fuel cell stations to support alternative fueling.

A number of other California cities have since enacted similar bans, including Sebastopol and Rohnert Park. On August 23, 2022, Santa Rosa became the largest city in the nation to ban new gas stations when the City Council voted unanimously to ban construction of gas stations and expansion of fossil fuel infrastructure at existing gas stations within city limits. The ban is intended to help accelerate the transition from fuel to electric vehicles and encourage the use of alternative transportation. Similar bans are under consideration in other California jurisdictions, including Los Angeles, as well as jurisdictions in New York and British Columbia.

A report issued by Stand.earth, an environmental advocacy group, in June 2022 discusses how gas stations pose numerous health, environmental, equity, and financial risks to communities (<u>https://www.stand.earth/latest/people-vs-big-oil/los-angeles-and-local-</u> <u>governments-across-us-and-canada-form-growing-wave</u>), as summarized below: 1. Local Environmental, Health, and Equity Impact – Even small spills at stations threaten public health as over time they can add up to significant soil and water pollution. Research shows gas stations vent more toxic fumes than previously thought, including benzene, a known carcinogen and ozone, which causes respiratory problems and asthma. The US EPA says that about half of the 450,000 brownfield sites are contaminated by petroleum, with much of it coming from leaking underground tanks from old gas stations, and a US EPA study showed that 11% of Black, Indigenous, and People of Color (BIPOC) people and 14% of those below the poverty level in the US live within a half mile of a brownfield site.

### References:

- https://www.sciencedaily.com/releases/2014/10/141007103102.htm
- <u>https://www.indianaenvironmentalreporter.org/posts/gas-stations-emit-10-times-more-benzene-than-previously-recorded#:~:text=Researchers%20from%20Columbia%20and%20Johns,benzene%20and%20other%20toxic%20chemicals.</u>
- <u>https://www.scientificamerican.com/article/is-it-safe-to-live-near-gas-station/</u>
- <u>https://www.epa.gov/ust/petroleum-brownfields</u>
- <u>https://www.epa.gov/sites/default/files/2015-</u> 09/documents/webpopulationbrownfieldsites.9.28.15.pdf
- 2. Financial Risks to Cities and Neighborhoods Gas stations are a declining business in the US and Canada. A recent study found that up to 80% of traditional model gas stations may be unprofitable in about 15 years. But unlike many other kinds of businesses, when a gas station shutters it's an expensive and complicated process to clean up the all-too-common leaks and contamination from underground storage tanks so the site is safe for a new business to open there. Cities and counties face pollution risks and costly cleanups associated with gas stations as this story from Newburgh, NY shows. Similar stories are found in Van Zandt, WA and Erie County, NY. The cost of remediating a gas station site ranges from tens of thousands to more than \$2 million, with an average cost of \$243,299 per site. Prohibiting new gas stations prevents an increase in financial risk from clean up and redevelopment.

### References:

- <u>https://www.marketwatch.com/story/how-many-gas-stations-are-in-us-how-many-will-there-be-in-10-years-2020-02-16</u>
- <u>https://www.bcg.com/publications/2019/service-stations-future</u>
- https://www.recordonline.com/story/news/2022/05/09/newburgh-vacantbroadway-eyesore-developer/9644138002/
- <u>https://www.ocregister.com/2010/03/17/gas-station-clean-up-example-of-lasting-cost/</u>
- <u>https://cfpub.epa.gov/si/si\_public\_record\_Report.cfm?Lab=NRMRL&dirEntryl</u> <u>d=96736</u>
- **3. Global Climate Impacts** Burning fossil fuels for transportation has huge climate impacts. The US and Canada are first and second in the world for per capita greenhouse gas emissions from road transportation. Transportation is the largest sector for US greenhouse gas emissions, making up 27% of the total most of that

from burning gasoline in cars, trucks and SUVs. In Canada transportation is responsible for 24% of greenhouse gas emissions, making it the second largest source of greenhouse gas emissions in the country. A steady transition away from gasoline cars is critical for meeting greenhouse emission reduction goals at every level of government. Ending new gas station construction may not immediately reduce the amount of fossil fuels burned for transportation. But it will send a clear signal to the markets that new gas stations are a needless stranded cost because communities expect to make the transition to transportation powered by clean energy.

### References:

- <u>https://www.statista.com/statistics/1201243/road-transport-sector-per-capita-co2-emissions-worldwide-by-country/</u>
- <u>https://www.epa.gov/ghgemissions/sources-greenhouse-gas-</u> emissions#:~:text=The%20largest%20source%20of%20greenhouse,Greenh ouse%20Gas%20Emissions%20and%20Sinks.
- 4. EVs Are the Future Fossil fuel pumps are going to be obsolete. California recently decided to end new gas car sales by 2035. Washington State plans to by 2030, and the idea is gaining traction in other places. Car makers are bolstering their EV offerings, with GM, for example, planning to shift entirely to building all-electric cars in a little over 12 years. Existing fossil fuel pumps are more than sufficient to meet the needs during the transition. Any new gas stations will rapidly become stranded assets. The Biden Administration has announced its plan for making EV charging stations accessible across the US. And more and more charging stations will be available at workplaces, cinemas, public buildings, shopping centers, and other places where cars are parked for extended periods of time. Many local governments are also increasing transit, including transit powered by renewables rather than fossil fuels, and promoting active transportation options, including walking and biking in Canada and the US.

# References:

- <u>https://www.cnbc.com/2022/04/13/california-releases-proposal-to-ban-new-gas-fueled-cars-by-2035-.html</u>
- <u>https://www.thomasnet.com/insights/gm-marks-another-milestone-in-all-</u> <u>electric-future-with-cadillac-lyriq/</u>
- <u>https://www.cnn.com/2022/06/09/politics/electric-vehicle-charging-</u> <u>stations/index.html</u>
- <u>https://www.pymnts.com/connectedeconomy/2022/businesses-bet-charging-stations-energize-customer-traffic/</u>

### Truckee 2040 General Plan

The draft Land Use Element of the 2040 General Plan contains goals, policies and action items which would prohibit future land uses that have been identified as inconsistent with the vision and goals for future development, including the following:

 Goal LU-1 (Efficient and Sustainable Land Use Patterns) – Create efficient land use patterns to provide adequate land designated for residential, commercial, industrial, and open space/recreational uses while reducing environmental impacts, minimizing residential and commercial sprawl, increasing access to opportunity, and mitigating threats to public safety. In creating the draft land Use Element, one of the major changes from the 2025 General Plan was that greenhouse gas emissions reduction and climate change adaptation were considered in the creation of the land use map. The element was developed in consideration of the Town Council and GPAC goals and priorities, which include promoting sustainable land use patterns that support walking, biking and transit.

The Town has adopted GHG emissions targets that reflect the seriousness of the climate crisis. In November 2017, the Town Council adopted Resolution 2017-58, setting long-term goals for emissions reductions and renewable energy. By 2030, the Town's goal is to have 100 percent of electricity used townwide come from renewable sources, with the objective that all energy use (e.g., electricity, home heating fuels, transportation fuels) in the town come from renewable sources by 2050. Additionally, the resolution established a target to cut community-wide GHG emissions 80 percent from 2008 levels by 2040. The Climate Ready Truckee – Climate Change Adaptation Plan was subsequently developed to reduce climate-related risk to both people and nature. Strategies and actions presented in the Adaptation Plan are designed to protect the most vulnerable residents while building resilience across all people, businesses and natural resources throughout the community.

The Town has also taken considerable steps to reduce GHG emissions within Truckee, as summarized below:

- Energy Conservation: Implementing energy efficiency upgrades at municipal facilities, upgrading light fixtures, adding daylight controls for lighting systems, installing pipe insulation on hot water piping, implementing network thermostats for control of water-source heat pumps, and implementing occupancy-based lighting fixtures; completing a follow-up energy efficiency audit of all municipal facilities; authorizing participation in four Property Assessed Clean Energy programs that help to assess and finance energy efficiency and renewable energy upgrades for residential and non-residential buildings in Truckee; installing solar-powered pedestrian crossing lights on Brockway Road. solar lighting in the Envision DPR project and on the Stockrest Springs roundabout, and on the Soaring Way/Joerger Drive/Raley's roundabout; and initiating conversations with the Truckee Donner Public Utility District (TDPUD) on increasing renewable sources in the utility's generation portfolio and collaborating with TDPUD to expand their home energy retrofit incentives; and partnering with the Truckee Tahoe Airport District and Truckee Fire Protection District to complete a scoping study to evaluate various biomass solutions for our community.
- **Transportation:** Updating the Truckee Trails and Bikeways Master Plan, which includes goals and policies to guide expansions to and maintenance of pedestrian and bike infrastructure and to support facilities aimed at increasing bicycle and pedestrian trips in the community; developing a Long-Range Transit Plan that outlines plans for establishing new neighborhood routes and connections, providing extended service hours, and expanding dial-a-ride services; transitioning to a "fare-free" system for trips on the Truckee local routes and on the State Route (SR) 89 and SR 267 routes operated in partnership with Placer County; initiating a microtransit pilot project preparing to roll out an e-bike program; implementing a transportation demand management (TDM) program for Town employees including 9/80 work schedules for its staff to reduce employee trips to Town Hall, an incentive program for employees using alternative transportation (e.g., bikes, carpooling, etc.), encouraging virtual meetings, and a work from home pilot program on Fridays to reduce VMT generated by daily Town business; purchasing hybrid equipment for the Public Works Department and zero-emissions electric vehicles for the Police Department; installing three EV charging stations at Town Hall for fleet, employee, and

public use; and adopting the Innovate Gateway Strategy, a California Department of Transportation (Caltrans) grant-funded study to identify opportunities for new housing options, economic development strategies, sustainable mobility improvements, and quality of life enhancements to reduce VMT on Interstate 80.

- Waste Reduction and Recycling: Updating the Town's waste and recycling services to improve diversion rates under a new franchise agreement with its waste hauler, with Truckee residents moved from using colored plastic bags to wheeled carts for their recyclables and yard waste, estimated to save up to three million plastic bags in 10 years; developed a sustainability-oriented website, Keep Truckee Green, which provides residents with a recycling guide and other information about solid waste services and waste-related GHG emissions reduction; and beginning outreach efforts and introducing the Feed Truckee food recovery program to reduce organic waste and increase food recovery as part of reaching the targets established in SB 1383.
- **Greenhouse Gas Inventory and Forecast Summary:** Completing the Community-Wide and Municipal Operations 2016 GHG Emissions Re-Inventory, which includes a comparison of the Town's 2008 GHG inventory with an updated GHG emissions inventory for the year 2016; reprioritizing the implementation of a real-time municipal GHG tracking dashboard and adding this item to the Town's workplan; and entering into an agreement with nZero with implementation of this dashboard in progress.

The 2040 General Plan demonstrates the Town's commitment to addressing climate change by dedicating an element to climate action and setting firm goals for reducing greenhouse gas emissions, increasing alternative transportation, promoting building efficiency standards, upgrading existing buildings and reducing solid waste sent to the landfill while increasing recycling and diverting organic waste to more efficient uses. A ban on gas stations is not envisioned to provide a single solution to reducing GHG and achieving the Town's climate action goals, but rather to be one step in the broader Town's climate action planning efforts.

### II. Mini-Storage Facilities

An online search for current self-storage facilities in Truckee identified three existing facilities within the Town limits (on Pioneer Trail, West River Street and Highway 267 near the airport) and two additional self-storage facilities located outside the Town limits near the airport. A similar search for self-storage facilities in Reno resulted in 21 self-storage facilities. The existing facility locations in Truckee are shown in the map below:



In addition to the existing facilities, an additional 67,840 sf/393 unit mini-storage building with 2,164 sf office/co-working space and 1,769 sf residence and garage was approved in July 2022 by Placer County. The property is located just outside the Town of Truckee boundary adjacent to Highway 267.

### Potential Mini-Storage Development

Under the current Development Code, construction of new mini-storage facilities would be allowed in the following zoning districts with the following permit requirements:

- **Permitted use** with approval of a Zoning Clearance by the Community Development Director in the CS (Service Commercial), M (Manufacturing) and DM (Downtown Manufacturing) zoning districts.
- **Conditionally allowed use** with approval of a Use Permit by the Planning Commission in the CG (General Commercial) zoning district.

In terms of recent interest in future mini-storage facilities in Truckee, the Planning Division processed a Preliminary Application in 2021 for a 21,773 sf self-storage facility on Pioneer Trail. As part of the Preliminary Application Review, staff noted that the proximity of the project site to one of the main industrial areas of Truckee presented an opportunity to achieve Town priorities by creating opportunities for new service commercial and/or light industrial businesses, as well as supporting the relocation of existing industrial uses. However, staff noted that the construction of another mini storage facility was not a use that had been previously identified as a community need or priority. Staff referenced General Plan Goal ED-2, which encourages high wage light industrial development in Truckee. Policies in support of this goal include providing sufficient business park and light industrial space to allow for the attraction and expansion of quality employers within Truckee, and encouraging uses consistent with high wage and high density employment in business parks and light industrial areas, as opposed to services or low employment density uses such as warehouse space.

Staff is also currently processing an application for Joerger Ranch Parcel 2, located in the M1 (Manufacturing) zoning district within Joerger Ranch along Soaring Way across from the Soaring

Ranch development. The developer has expressed interest in utilizing the industrial space within the project as vehicle storage that could be rented by property owners with a vehicle that they would like to store in an off-site location from their residence. Staff discussed with the applicant team that one of the main goals of the Council in adopting the Specific Plan was to provide space for existing industrial uses to relocate off the Truckee River, and that it did not appear that a vehicle storage facility would facilitate the Town's goals for industrial development. However, "Commercial Parking and/or Vehicle Storage" is a conditionally allowed use within the M1 zone with approval of a Use Permit by the Planning Commission. Under the current Specific Plan zoning and allowed uses, this use could be allowed in the M1 zone if the findings to approve the Use Permit can be made.

### Mini-Storage Demand

Mini-storage was not a use that was analyzed in the 2020 BAE Urban Economics study. A review of current vacancy rates at the existing mini-storage facilities in Truckee revealed that two of the facilities currently have waiting lists and there is existing capacity at the other two facilities, including at the airport self-storage facility in a variety of unit sizes (small, medium, large, and car/RV/boat storage) ranging from \$175 to \$455 per month. It is unknown what the local vacancy rates will be upon construction of the new storage facility located in Placer County though it will likely increase capacity by a substantial amount.

### Mini-Storage Impacts

Due to the fact that these types of facilities create minimal employment opportunities, they do not generate significant economic activity. They are commonly viewed as a "dead use" in that they neither create jobs nor create the types of activity that contribute to a vibrant community, unique Truckee identity, and sense of place. Constructing this type of use in a commercial or manufacturing zone would mean less opportunities for other uses that have been prioritized by the Town (such as industrial and community-service commercial uses) to develop. The development of uses that do not create jobs also reduces the ability of local residents to access employment opportunities. The amount of land required to accommodate these types of projects tends to be significant. For example, the recently approved Martis Valley Self Storage project located just outside the Town boundary near the airport is located on a 2.88-acre parcel. The Pioneer East Self-Storage Preliminary Application proposed a mini-storage facility on a 9.62-acre parcel of land zoned for CS (Service Commercial) uses. The size of these properties provides a relatively low return in economic benefits based on providing a warehousing/storage use versus a locally serving commercial or industrial use, in addition to the number of employees generated by the potential uses of the site, as discussed further below.

To analyze the potential loss of employment generation by a mini-storage facility, which typically employs a minimal amount of staff, Town staff calculated the employee generation for a 110,000 sf storage facility (comparable to a self-storage facility in Placer County that was approved in June 2022) versus a similarly sized commercial project, based on the requirements of Development Code Chapter 18.216 (Workforce Housing). The calculations are included below:

- C. Employee Generation. For the purposes of this Chapter, employees generated by a development project shall be calculated as follows:
  - The standard number of full-time equivalent employees (FTEE) generated by a land use type shall be:

Land Use	FTEE
Commercial including retail, service, office, and restaurant	1 FTEE per 500 s.f. of gross floor space
Industrial, not including uses with substantial outdoor work or activity areas	1 FTEE per 1,000 s.f. of gross floor space
Visitor Lodging	As determined by review authority based upon comparison with similar businesses
Uses Not Listed	As determined by review authority based upon comparison with similar businesses

Based on the information above, a 110,000 sf commercial project would generate 220 full-time equivalent employees (based on one FTEE per 500 sf of floor area), versus 120 employees for a similarly sized industrial project (based on one FTEE per 1,000 sf of floor area). The recently approved 110,000 sf mini-storage facility in Placer County estimated that there will be 1.5 employees onsite daily, including one full-time manager and one part-time relief manager, which is significantly less employee generation than a similarly sized commercial or industrial project.

From an environmental standpoint, these uses are typified by large, paved areas with minimal landscaping which can contribute to a heat-island effect. This use does, by nature, generate vehicle trips due to the fact that the storage is occurring at an offsite location. The prohibition on this use is intended to address the creation of efficient land use patterns which benefit the community by providing active uses and uses that generate high-wage employment opportunities. If the use is ultimately prohibited and future demand for mini-storage exceeds the available amount of storage space, residents would have the option to utilize the many self-storage facilities exist in Placer County near the Town's boundary along Highway 267 as well as Chilcoot, Portola and the Reno/Sparks region. Alternatively, a household could choose to reduce its storage needs so that off-site storage isn't necessary. If the provision of mini-storage in the future becomes a council or community priority, or traveling to out-of-town facilities is undesired, the Council can elect to amend the GP to allow this use.

#### Truckee 2040 General Plan

One of the goals of the 2040 General Plan is to establish efficient and sustainable land use patterns (Goal LU-1). To achieve this goal, Policy LU-1.7 prohibits the development of a number

of inefficient land uses, including new gas stations, mini storage facilities and golf courses. Golf courses are already prohibited under the 2025 General Plan, and the prohibition on new gas stations is proposed to ensure that future development involves uses that achieve the Town's sustainability goals. Additionally, the Economic Development element encourages economic diversification and year-round employment opportunities (Goal ED-1) and includes policies related to prioritizing land uses consistent with higher density economic activity and high wage employment, as opposed to services or low employment density uses, such mini-storage facilities. Action Item ED-1.H provides direction to amend the Development Code to prohibit uses and services with low density economic activity and low wages, such as mini-storage facilities. This is also a matter of community character and shaping Truckee's future through land use actions that fulfill the community's vision.

Constructing a mini-storage use in a commercial or manufacturing zone would mean less opportunities for other uses that have been prioritized by the Town (such as industrial and community-service commercial uses) to develop. The development of uses that do not create jobs commensurate with the scale of the project also reduces the ability of local residents to access employment opportunities. A prohibition on this use would ensure that the remaining land available for development in Truckee, as well as future redevelopment opportunities, would be targeted to the types of uses that would generate economic activity and create employment opportunities for the local workforce.

### III. Single Retail Uses of 20,000 SF

The 2025 General Plan includes Goal LU-6 related to preserving and enhancing the distinctive community character of Truckee and each of its neighborhoods. To implement this goal, the General Plan includes Policy P6.1 limiting the maximum size for a single retail commercial use building to 40,000 square feet.

The Truckee community has a long history of concern with the development of big box retail uses and the building types that are associated with these uses. One of the factors in the community's decision to incorporate in 1993 was a desire to have more control over the development of that type of use, which was proposed at the time. The 40,000 sf cap in the 2025 General Plan was a step toward ensuring that future single-retail projects were consistent with the community's expectations for the size of this type of use.

Since that time, the Town has continued to refine its approach to larger retail uses. Larger floor plate uses were included within the Regional Commercial zoning district in the Joerger Ranch Specific Plan, under the concept that this zone would provide a location for larger retailers to establish uses or provide relocation opportunities for existing businesses in Truckee looking to expand their businesses. The targeted uses for the CR zone district include grocery and/or specialty food markets and large floor plate commercial, office and retail businesses with indoor floor layouts consisting of 5,000 square feet or larger. National retail chains are discouraged unless it can be demonstrated through an economic analysis that such a use will benefit the Town as a whole and avoid or minimize economic impacts to the downtown. The Phase 1 development in Soaring Ranch included the 35,478 sf Raley's grocery store, 12,000 sf co-anchor, and a multi-tenant building with seven tenant spaces ranging in size from 603 to 1,750 sf. As projects within subsequent phases of Soaring Ranch have evolved, the developer has identified that there is not a current need for large floor plate retail businesses, and the approved commercial spaces within Soaring Ranch Phase 2 range in size from 2,700 sf to 7,424 sf.

Within the Railyard Master Plan, the maximum allowed size was capped at 35,000 sf for a grocery store in the Downtown Extension District zone and 25,000 sf for a neighborhood specialty grocery store in the Industrial Heritage zone. The Master Plan guidelines state that developments should contribute to a healthy mix of diverse serving commercial and entertainment uses (such as restaurants, high quality grocery store, bakeries, boutique hotels, bars small office space, and Retail), and that a mix of both local and tourist serving retail is encouraged. If there is future demand for an additional grocery store in Truckee, one could be built within the Railyard under the allowed sizes specified in the Master Plan.

The 2020 Bay Area Economics study identified that based on available market data, the retail real estate market in Truckee is relatively healthy, with low vacancy and rents that are above the regional averages. The Town has exceptionally high per capita retail sales in several categories, including the building materials and restaurant categories. This significant injection is largely due to the strong tourist economies that lay at the center of the regional economic landscape, where even building materials sales are largely driven by demand for second homes in Truckee and throughout North Tahoe. Despite these advantages, the study identified that there is concern among Town staff and members of the community that the Town is struggling to retain many of its important resident-oriented retailers. With a relatively small resident population, the community lacks the critical mass of consumers necessary to retain some types of retail businesses. The Town also suffers from a relative shortage of year-round lower wage retail workers. Retailers also face considerable competition from larger, often lower cost, retail establishments in Reno. BAE noted that the retail businesses which are likely to remain more resilient are those that represent daily and weekly destinations for Truckee residents, as well as those that are more closely reliant on having a location in the Truckee-North Tahoe region, including those with Tahoe brand products that appeal to visitors and residents alike.

The proposed 20,000 sf limit for future retail uses in Truckee is intended to target the development of smaller retailers, which are more likely to be locally owned businesses rather than chain stores, and tend to be more unique in nature, which contributes to Truckee's mountain town community character. The proposed floor area limit will help guide future development to encourage these types of retail uses.