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EL DORADO COUNTY

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General Plan: ROI 182-2011

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The overall theme of the proposed changes, especially in the Community Regions, seems to be higher density development which goes against the county's vision as well as against the majority of the resident's desires that have been repeatedly voiced over and over again throughout the years. The two most observable items to people in the county are **open space** and **traffic**. These two items also have the biggest impact on quality of life and what makes the county attractive to residents and business. Higher density development will significantly compromise our quality of life.

In addition, placing some requirements (either as is or modified) into documents other than the General Plan makes them too easy to modify in the future and indicates lesser importance. It will make it too easy to piecemeal changes that cumulatively have a significant impact without performing an EIR to assess this impact.

LAND USE ELEMENT

Policy 2.2.1.2 and Table 2-1-Major Concern

Multi-Family Use: Consider amending density from 24 units per acre to 30 units per acre to comply with California Government Code 65583.2(c)(iv) and (e) which requires jurisdictions within Metropolitan Statistical Areas (MSA) of populations greater than 2,000,000 to allow for up to 30 units per acre when determining sites to meet the low and very low housing allocation categories. El Dorado County is located within the Sacramento MSA. Amend the Multi-Family land use to allow for commercial as part of a mixed use project. Amend the Multi-Family land use to encourage a full range of housing types including small lot single family detached design without a requirement for a Planned Development.

High Density Residential Use: Consider deleting the requirement for a Planned Development application on projects of 3 or more units per acre.

Amending the density from 24 to 30 units would have a significant impact on site specific projects designated as multi-family use. This change would required that the infrastructure must be in place prior to development of the project.

This may be appropriate for small developments on a single acre, but when creating more than 10 units in an area, a Planned Development is appropriate—especially if up to 8 units are on a single acre.

Policies 2.2.3.1, 2.2.3.2 and 2.2.5.4-Major Concern

Consider amending the 30% open space requirement inside of Community Regions and Rural Centers to allow lesser area of “improved open space” on site, set criteria for options in meeting a portion of the requirement off-site or by an in lieu fee option as deemed necessary.

This would allow too many discretionary decisions by county policy makers on open space issues.

Regardless of the “improvement” of the open space, a reduction from 30% open space will dramatically change the feel of an area. Even worse, allowing open space to be off-site completely removes the rural feel of an area that is being developed and again violates the fundamental principles of the county’s citizens.

Policy 2.2.4.1-Major Concern

Consider amending the Density Bonus policy which allows incentive for the creation of open space as part of residential projects, and implement policy specifics through Zoning Ordinance.

Density Bonus has encouraged developers to request higher density projects for increased profits instead of better projects.

It is not appropriate to have a Density Bonus in Medium Density and Low Density Residential land use areas. Instead, an owner should apply for a change in land use designation and be evaluated on a case by case basis. Otherwise, a Density Bonus in these zones amounts to a change in land use and would significantly change the intention of the land use in the General Plan.

Policy 2.2.5.4-Major Concern

Consider deleting policy.

The requirement for a Planned Development belongs in the General Plan as it is one of the fundamental principles of our county that ensures preservation of open space as well as having infrastructure in-place prior to the development. It is too important to be moved from the most important planning document of the county, the General Plan.

New Policies-Major Concern

Consider setting criteria for and identify Infill sites and Opportunity areas that will provide incentives substantial enough to encourage the development of these vacant/underutilized areas.

This could increase densities in infill areas without providing the required infrastructure.

The proposed language by staff for “Promote Infill Development” item d) should have the following words added at the end of the sentence “, but only after all infrastructure is in place that will support such future development”.

TRANSPORTATION AND CIRCULATION ELEMENT

Policy TC-1a, TC-1b, and Table TC-1-Major Concern

Consider revising policies, and table to bring objectives into conformance with policy TC-1p, TC-1r, TC-1t, TC-1u, Tc-1w, TC-4f, TC-4i, HO-1.3, HO-1.5, HO-1.8, HO-1.18, HO-5.1, and HO-5.2, to allow for narrower streets and road ways and to support the development of housing affordable to all income levels.

Road widths should not be set by housing issues, but for public safety issues.

Allowing narrower streets sacrifices safety of our citizens in a significant way. To do this for financial gain is not appropriate. Highway standards should be based strictly on safety and if a road cannot meet the standards, that becomes what limits the use and development of a parcel—we should not let the use and development of a parcel dictate the safety level.

Policy TC-1m, TC-1n(B), TC-1w-Moderate Concern

Consider amending policies to clean up language including; TC-1m delete “of effort” TC-1n(B) replace accidents with crashes; and TC-1w, delete word maximum.

Why replace the word “accidents” with the word “crashes”? Are they considered the same? Is one more inclusive of incidents than the other? Why not include both “accidents and crashes”? Or, are all accidents a subset of crashes? We need to make sure that this change does not reduce the need for safety improvements on our roads.

Table TC-2, TC-Xb and, TC-Xd-Moderate Concern

Consider amending or deleting table TC-2 and maintain list outside of General Plan and amending any policies referring to Table TC-2.

Traffic is one of the two most observable items to people in the county. A list of these roads belongs in the General Plan. If they are removed, an EIR would have to be performed every time a new road segment was added to the list or the Maximum V/C ratio was changed. The EIR needs to know what to evaluate now and cannot anticipate future changes by the County.

In addition, Policy TC-Xf should not have the item “or (2) ensure the commencement of construction of the necessary road improvements are included in the County’s 10-year (or 20-year) CIP”. This second item should be eliminated since the CIP changes frequently and is budget dependent. The improvements might never be constructed and then the citizens would have to live with unbearable traffic forever. Or, expecting citizens to tolerate traffic and safety problems for 10 or more years is unreasonable.

Policy TC-4i, TC-5a, TC-5b, and TC-5c- Moderate Concern

Consider amending policies to provide more flexibility when requiring sidewalks.

Staffs proposal in the LDM to allow the possibility of “in-lieu fees instead of construction at time of development” says that we can compromise safety if we are paid a fee. Sidewalks are either required for safety or they are not—collecting a fee does not

mitigate the increased risks associated with not having a sidewalk! Public safety should be of utmost concern.

PUBLIC SERVICES AND UTILITIES ELEMENT

Policies 5.2.1.3 and 5.3.1.1- Moderate Concern

Consider amending policies to increase flexibility for the connection to public water and wastewater systems when projects are located in a Community Region.

The proposal is to remove the word “shall” and replace with the word “may” in requirement of connecting to public water and public wastewater. This is not appropriate for a Community Region! The whole idea of a Community Region is that infrastructure is readily available. If a development cannot connect to both public water and public wastewater, it does not belong in the Community Region—especially for high-density residential and multifamily residential development. The use of the word “may” might be appropriate in the case of medium-density residential, commercial, industrial, and research and development projects.

Also, the addition of the words “if reasonably available” should be replaced with “if appropriate”, otherwise if public water and public wastewater are not “reasonably available” an applicant could claim that they are allowed to develop using well water and/or septic by right.

CONSERVATION AND OPEN SPACE ELEMENT

Policy 7.1.2.1-Major Concern

Consider amending the restrictions for development on 30% slopes, and set standards in the Zoning Ordinance and Grading Ordinance.

Construction of homes on 30% grade would cause additional environmental impacts on the area (grading, water runoff, and erosion).

The existing language in the General Plan seems appropriate. If there are additional exceptions that are appropriate but not currently included, then add them to the General Plan. Keeping this in the general plan allows a proper EIR to be performed.

LAND USE ELEMENT

Policy 2.2.1.2 -Major Concern

High Density Residential: Consider analyzing the effects of increasing High Density Residential Land use density from a maximum of 5 units per acre to 8 units per acre.

Increasing the density to 8 units per acre would put a tremendous load on the supporting infrastructure.

This amounts to giving away the Density Bonus without earning it! The analysis for this type of density should be done through the Density Bonus provision.

Policy 2.1.1.1 and 2.1.2.1-Major Concern

Consider analyzing the possibility of adding new, amending or deleting existing Community Regions or Rural Center planning areas.

These areas should be identified before analysis to determine public support for the change.

TRANSPORTATION AND CIRCULATION ELEMENT

Policy TC-Xd, TC-Xe, and TC-Xf- Major Concern

Consider revising the policies to clarify the definition of "worsen", what action or analysis is required if the threshold of "worsen" is met, clarification of the parameters of analysis (i.e. analysis period, analysis scenarios, methods), thresholds and timing of improvements.

This should be a scientific term that has a measurable value and infrastructure trigger points must be established to prevent reduction of traffic circulation and degrading of service

Economic Development

Policy 10.2.1.5- Major Concern

Don't see any ROI language indicating a desire to analyze a change in this policy.

The way staff has proposed to change this policy violates another fundamental principle. The proposed word change from "shall" to "may" could result in existing citizens subsidizing developers for the cost of facilities, infrastructure, and services. All development applications for subdivision must require a Public Facilities and Services Financing Plan that assures cost burdens do not fall on existing residents.

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Zoning Ordinance: ROI 183-2011

6. Provide alternative means to any open space requirement as part of a planned development to provide more flexibility and incentives for infill development and focus on recreation in Community Regions and Rural Centers;- ***Major Concern***

This will allow too many discretionary decisions by county policy makers on open space issues.