
**Regulatory Reform Subcommittee
of the
Economic Development Advisory Committee**

July 25, 2011

**Report to the:
El Dorado County Board of Supervisors**

Regulatory Reform Subcommittee
July 25, 2011

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EDAC Regulatory Reform Report

EDC Board of Supervisors Workshop

July 25, 2011

The El Dorado County Economic Development Advisory Committee (EDAC) was directed by the Board of Supervisors “to recommend ways to reform and improve the regulatory processes through a review of the 2004 General Plan and other county regulations”. EDAC charged the Regulatory Reform Subcommittee and its vast array of working volunteers, to work with staff to fulfill this task. During the past two years these volunteers have reviewed: the General Plan (GP), proposed Zoning Ordinance (ZO), proposed Land Development Manual (LDM), fire regulations, Traffic Impact Mitigation (TIM) fee program, and local development/growth patterns. We have presented issues of concern along with technical reports, to the Board of Supervisors (Board) for appropriate action. These EDAC reports include a Land Use Forecast that reports that the Community Regions (CR) with sewer (El Dorado Hills, Cameron Park, Shingle Springs, El Dorado/ Diamond Springs) may accommodate 75% of the remaining 20,000 new dwelling units to be accommodated by the General Plan – if not constrained by traffic and other regulations.

After a number of public hearings, the Board of Supervisors identified their concerns as follows:

1. After building 12,000 new dwelling units under the 2004 General Plan, the El Dorado County Job/Housing balance has worsened considerably;
2. Substantially all of the 12,000 new dwelling units built under the 2004 General Plan, accommodate only households with above moderate income (\$90,000+ per year). Housing for moderate income households (\$55,000- \$90,000) must be accommodated;
3. \$ 800,000,000 in sales leakage, including \$ 400,000,000 taxable retail, continues to drain from the El Dorado County economic bucket;
4. Rural Commerce, including Agriculture and Natural Resources, as well as Rural Lands, must be protected and encouraged, to develop jobs and sales as well as to maintain the rural character of the County.

In order to address these constraints, the Board adopted a Resolution of Intention (ROI) to proceed with a Targeted General Plan Amendment (TGPA). On July 25, 2011, the Board will consider the scope of the Project Description for the environmental review for the TGPA and related activities, such as the Zoning Ordinance Update, LDM, Fire Regulations and Tim Fee Update. In hearing this workshop, EDAC asks that this workshop include the following considerations:

1. **Don't Waste a Good EIR**. The scope of the GPA environmental review must be broad enough to allow analysis of any actions the Board wants to consider for approval. This environmental review will empower the Board to act, by including in the project analysis those actions the Board wants to consider for approval after CEQA compliance. For instance, over the past three years the Board has initiated at least three Resolutions of Intent to amend the General Plan related to: Amending Camino/Pollock Pines from a Community Region to a Rural Center; Revising the 30% open space requirements for Planned Developments (PD) in Community Regions; and, Expansion of Agricultural Districts. These actions have not been completed, at least in part, because each requires some form of environmental review before the Board is permitted to act; and the Board may want to consider including those amendments in the environmental review for the TGPA. Similarly, the Board does not have the power to approve the GPAs, Zoning Ordinance update, ROIs or other related actions on July 25. The Board will be considering the scope of the project description only, so that after a CEQA review is complete, the Board may take action.

2. **Don't let the tail wag the dog.** In April 2011, the Board was asked to spend \$220,000 for an environmental review of the ZO update, to check this item off the "to do" list. This effort to fast-track the Zoning Ordinance update would have turned the planning process upside down and obstructed a comprehensive approach to GPA, zoning, LDM, Fire, TIM fee program and related issues. The General Plan (and Amendments) are the charter to which the Zoning Ordinance must conform, not the other way around. The tail does not wag the dog. In turn, the LDM implements the GP and ZO, and it trails both the Zoning tail and the GPA dog.

3. **Best Bang for the Public Buck.** The TGPA and Zoning Ordinance update must be placed in the context of the Development Services Department's ("DSD") fourteen item work plan, presented to the Board on April 4, 2011, which includes the following activities as prioritized in **Exhibit A**:

Task #	Description	Estimated Cost	Source*
1	Zoning Code Update	\$ 220,000	DSD
2	Housing Element Reporting		
3	Housing Element Update (2013?)	\$ 200,000,	EDAC
7	ROI – 30 % Open Space in PDs	\$ 150,000 7,8,9,11	EDAC
8	ROI – Historical District		
9	ROI – Ag District Expansion		
11	ROI – Camino/Pollock Pines (Change from Community Region to Rural Center)		
12	Validate/Refine Land Use Forecast for TIM Fee Update	\$ 175,000	DSD
14	Targeted General Plan Update	\$ 750,000	DSD
Estimated Total Cost		\$ 1,495,000	
*Source of Estimated Cost from DSD work plan, or estimated by EDAC where no DSD cost estimate is available.			

Future work action includes MUD II, and although mentioned by the Board as an action item in January, a Climate Action Plan (CAP) is not on the task list. EDAC estimates a future MUD II at \$ 75,000 and a Climate Action Plan at \$ 150,000.

Altogether, the above referenced tasks in the DSD work plan, with MUD and CAP added, are estimated by DSD (or EDAC where no cost estimate was provided by DSD) to total approximately \$ 1,750,000. Additionally, the GPA before the Board on July 25, 2011 and Land Use Forecast required to begin the TIM Fee Update process, are given very low priority (at Tasks #14 and #12 respectively).

In April 2011, DSD proposed to 'check off' the Zoning Ordinance for \$ 220,000 and put the GPA near the bottom of the list as #14. In contrast to this checklist approach, EDAC will be proposing a programmatic approach to the work plan which EDAC believes will allow the Board to accomplish all of the above tasks

(along with action on a CAP) and get the Best Bang for the Publics' Buck. In other words, implement a comprehensive project that will complete substantially all of the DSD- and DOT-related TIM tasks at a fraction of the estimated cost. The cost of the whole project will be substantially less than the total of the estimated costs total of the component tasks.

EDAC recognizes the actual cost of the project will be directed to those activities that are included within the project description. For example, the GP review identifies a very limited supply of entitled lands that accommodate housing for households below \$ 90,000 a year, and these same limited lands must also be used to plug the \$ 800,000,000 a year loss in sales leakage to neighboring jurisdictions. Land use changes in the General Plan would increase opportunities for moderate income housing and commercial development, resulting in increased retail sales. However, the costs to address environmental effects under CEQA could be substantial and could include major changes in land use and related traffic. Similarly, an expansion of zoning regulations for home occupations to allow employees, might result in new job creation and a potential reduction in out-of-county vehicle trips. The Board will need to consider the benefits of including of specific activities under the EIR umbrella, as well as the cost.

The cost of the environmental review should also take into account the continuing pro bono contributions by EDAC in the form of technical reports and outreach in the environmental review process.

Components and Factors for Project Description

The July 25th meeting is basically a scoping session for the CEQA project description being developed. EDAC is presenting the following observations, information, recommendations and reports for the Board to consider in determining which activities should be under the umbrella of the project description, to empower the Board to act on these activities after CEQA compliance:

1. Based on compilation of existing data and technical reports prepared by EDAC, **EDAC believes the GP growth assumptions are on track and achievable, with some course corrections.** These compilations and technical reports have been reported and are available for the environmental review process.
2. **EDAC believes the project description may be developed with no changes to the General Plan Land Use Map (GP LU-1).** Although the GP 5-year review identified a shortage of Commercial and Mixed Use Lands to accommodate retail as well as moderate housing needs, EDAC recommends that the GPA and environmental review identify potential locations for increasing the supply, proposed as "Opportunity Sites". These areas, such as Camino/SPI and Cameron Park South, have been discussed and will be included as staff generated opportunity sites, with no obligation or commitment by the Board. Property owners will still need to file project proposals for these sites, and would include appropriate CEQA review at the project level. There is no need for CEQA review of these sites in the GPA, but only a discussion that opportunity sites exist to address moderate housing and commercial demands.

As an alternative to this bare bones project description approach, the Board may consider it more cost effective to include any and all of the following actions in the Project Description. A cost/benefit analysis will be included as part of the "Best Bang for the Public Bucks" as part of the July 25th discussion.

- A) The Board has adopted the following Resolutions of Intentions (ROI) that would amend LU-1 and/or the General Plan land use element text, or the Zoning Ordinance:
 - 1.) **ROI 179-2010** adopted 10/7/10: El Dorado/Diamond Springs Historical Combining Zone District Overlay Zone
 - 2.) **ROI 013-2011** adopted 1/25/11: Ag District Expansion GPA. The BOS indicated in ROI 013-2011 adopted by the BOS 1/25/11 that Agricultural Districts be expanded from 50,000 to approximately 70,000 acres, primarily into lands designated Natural Resources (NR).

3.) **ROI 110-2009** adopted 5/19/09: Camino/Pollock Pines Rural Center **GPA**. The Board has indicated an interest in amending the General Plan to designate Camino/Pollock Pines as a Rural Center rather than a Community Region.

4.) **ROI 274-2008** adopted 10/10/08: **GPA**. The Board expressed its desire to amend GP Policies 2.2.3.1, 2.2.3.2, 2.2.5.4 and 2.2.5.13 to change the requirement that all residential Planned Development (PD) projects must designate 30% of the site as open space.

B) General Plan Policy 2.6.1.3 directs the Board to consider and approve Commercial designations for Highway 50 intersections.

C) GP Policy 2.9.1.4 directs the Board to consider other Community Region and Rural Center boundaries during the 5-year review process. Some have interpreted GP Policy 2.9.1.4 as limiting Board-initiated changes to the 5-year reviews.

3. **EDAC does not propose that the Project Description include the increasing housing densities required to meet RHNA targets within Multi-Family and Commercial/MUD land use designations.** Currently, the General Plan provides for: 16 du/acre for Commercial/Mixed Use; and 24 du/acre for Multi-Family Residential (MFR). This means an affordable housing project with a density of 24 du/acre is currently allowed, by right, on MFR up to 24 units per acre. EDAC promotes detached moderate housing on C/MUD and MFR lands at around 8-12 du/acre. In other words, EDAC promotes moderate housing on MFR and C/MUD lands *as an alternative to apartments*, which are allowed by right.

However, EDAC recognizes the Housing Element must be amended next year to increase densities to conform to current RHNA requirements. Thus EDAC believes that inclusion of the Housing Element requirements within this GPA would be good planning and cost-effective. If the Housing Element RHNA requirements are not incorporated into the Targeted General Plan Amendment and Zoning Ordinance update, the County will ultimately be faced with the cost of these actions as a “stand-alone” project. Accordingly, including the future Housing Element requirements in this GPA is both good planning and cost-effective, **providing the “Best Bang for the Public Bucks”**.

4. **The Project Description should allow the Board to consider a wide range of “Rural Commerce” activities.** “Rural Commerce” is used as a broad term that includes economic activity on 1,000,000 acres of lands in the Rural Regions. Economic activities have included lumber, mining, agriculture as well as grazing and a wide range of production landscape activities. In recent history, subdividing land has been a primary economic use of rural lands. The EDAC Land Use Forecast indicates that as long as 75% of the GP’s new dwelling units (DU) are accommodated in the Community Regions with sewer, significant rural land splits may not be required to meet GP housing goals. However, as an alternative to land splits, a broad range of economic activities have been suggested, several of which may require a General Plan Amendment.

The General Plan limits industrial lands in the Rural Regions to uses that support on-site agriculture, timber resource production, mineral extraction or other resource utilization, while GP Table 2-1 and GP policy 2.2.1.2 limit new commercial lands in the Rural Regions. Standards for these uses on rural lands would be incorporated into the Zoning Ordinance update, but because zoning must be consistent with the General Plan, a GPA would be required to enable the Zoning Ordinance to provide for “Rural Commerce” uses. Depending on classification methods, there are around 400,000 acres of lands that might accommodate some level of Rural Commerce. Given the hundreds of thousands of acres of land outside the Community Regions and Rural Centers, there are proposals for both Commercial and Industrial uses on these lands. The purpose of rural commerce is to allow a way for rural land owners to develop a working landscape to allow others to enjoy the open space provided by the land owner. Issues that have surfaced involve the tension between gentrification and working, rural lands.

The July 25 presentation will include specific proposals from representatives of Agriculture, Rural Lands, Low Density Residential and Natural Resources.

- A. Attached as **Exhibit B** is a report for Agriculture lands.
- B. Attached as **Exhibit C** is a background report with specific proposals for compatible uses for TPZ lands.;
- C. Attached as **Exhibit D** are reports on Rural Lands which proposes that owners of rural lands not designated as agriculture, should be allowed a wider range of commercial and industrial uses by right, as limited by state nuisance laws and objective standards for impacts such as noise, fire and traffic safety. The paper specifically requests a review of GP Policy 2.2.1.2 be included in the analysis to allow Industrial and Commercial uses within Rural Regions, and GP Policies 5.2.1.3 and 5.3.1.1 be amended to modify sewer and water connection requirements to allow for alternatives if public water and sewer prove unnecessary, *and* fire and other regulations may be met.

The report also considers the enabling of Ranch Marketing Programs on Livestock Operations consistent with the Economic Development Element (Policy 10.1.5.4) and Agriculture & Forestry Element (AF-D and AF-E) . This would encourage agri-tourism activities on productive agriculture lands as incentives for staying in agricultural production while providing another means of revenue for the agriculturist. Section 8.2.2 encourages the use of Ranch Marketing, or direct farm sales, on agricultural crop lands and sets the criteria for allowing these accessory uses to enhance the income opportunities for agriculturists. Although ranching operations are not specifically excluded from these uses, they are not included and therefore an amendment to Policy 8.2.4.4 addressing Ag Grazing lands and Ranch Marketing is recommended. EDAC also recommends 8.1.2.1 be considered for modification to allow Ranch Marketing activities on Grazing Lands.

5. The Project Description should allow the adoption of additional Commercial Zones to direct specific uses to specific areas of the County as mandated by the General Plan; and the actual zoning of lands suitable for these zones. This is consistent with the GP, which, not only allows but requires:

“Numerous zone districts shall be utilized to direct specific categories of commercial uses to the appropriate areas of the County” GP Policy 2.2.1.2;

The Zoning Ordinance shall expand the classes of permitted uses for commercial, industrial, and research and development uses on lands so designated on the General Plan land use maps” GP Policy 10.1.2.2.1.

The purpose for General Plan Policies is clear. Zoning is to plan specific uses for specific areas. A land owner then knows what is planned both when the property is purchased and when development projects are designed. The community plans and the developer must meet that plan. Rather than reacting to what a developer proposes, planning in advance for specific uses, in specific areas of the county, provides predictability. This also ensures that limited commercial areas will be developed in the best interest of the county. By analyzing the effects of specific uses, in the appropriate areas as directed by the General Plan, specific projects may then tier off the TGPA EIR, resulting in streamlining of the CEQA process. (**Exhibit I**)

“I’m Thinking of a Color”: Currently the process for a project coming in under the current Zoning Ordinance requires the developer to move forward in the following manner: 1) Developer proposes a use and a location for the project; 2) After spending large sums of money dedicated to engineering, architecture, special studies, etc and planning processes, he meets with Planning to see whether or not he “guessed” the right color – the same color the Planning Dept is looking for. If wrong – developer goes back to step one – which is the usual effect.

EDAC is asking the Board to enforce current General Plan policy and consider an alternative approach to the Zoning Ordinance by adopting the following:

1. “direct specific categories of commercial uses to the appropriate areas of the County”;
2. Set design standards and provide streamlining incentives for the developer if the design comports with the zoning plan and safe harbor plans and designs. To preserve the maximum flexibility and freedom of design, the developer is free to propose any “color” that he desires, instead of adhering to the streamlined planned approach adopted by the jurisdiction. Good new designs and standards that are ultimately accepted for a project design, may end up incorporated into the areas pre-approved plans.

6. The Project Description should allow the implementation of MUD II. MUD I was passed by the Board on 12/08/10 allowed mixed use vertical and horizontal projects on commercial lands *with a PD*, at a density of 16 DU/acre in Community Regions. At that time, the Board directed a “by-right” process, other than the PD process, to be developed along with a process for identifying MUD sites.

EDAC has prepared a procedure for the Board to consider as MUD II. This will be presented on July 25th, and includes a MUD II component to be allowed by right in selected commercial zones, such as a “Main Street Commercial/MUD Zone”. These would allow MUD by right in lands zoned for MUD, and selected “standard plans”, “master plans” or “safe harbor” schematic plans for detached, residential, compact dwelling units be allowed by right, along with pre-approved storefronts. The “safe harbor” compact residential master plans would also be allowed on MFR lands. RHNA requires El Dorado County to identify and maintain sufficient zoned Multi-Family lands to accommodate 4,008 Affordable Housing units, primarily located within community regions with sewer. Nearly all of the MFR lands are required to accommodate the 4,008 units as apartments, which must be allowed by right. EDAC proposes, as an appealing alternative to affordable apartments, that MFR lands also be permitted the use of detached, compact, residential type moderate housing units.

The Update process would ensure that compact detached residential dwelling units could be built in both MFR and Commercial lands, and Standard Plans and design guidelines (form-based codes) be included in the Zoning Ordinance for both land uses. Implementation of MUD II is primarily a zoning issue. Proposed General Plan Amendments will support Mixed Use Developments.

Road and other standards within the LDM must facilitate rather than impede detached residential projects.

MUD III - defined as “community design” - is in the future. As different communities evolve, such as Cameron Park, it is expected that Form Based Coding will be enacted.

7. The Project Description should allow the Board to address the deficient Jobs/Housing Balance by analyzing the effects, if any, of expanded Home Occupations. El Dorado County has a dismal job creation record. Actual jobs created under General Plan policies have resulted in significant imbalance in the Job/Housing ratio. A frequent response to this deficiency is often, “more folks here work out of their homes”. Since working at home reduces trips, home occupations meet both local and state goals.

At the beginning of the Zoning Ordinance update process, the county noted, “Many existing home businesses, that utilize employees, detached buildings, and create occasional noise, have operated for years without complaint, or impact on neighbors, but they are illegal.” We suggest development standards such as setbacks and/or ,hours of operation: (7 a.m. to 7 p.m). The Economic Element of the General Plan includes policies to encourage home occupations based on establishing standards in the Zoning Ordinance.” (Zoning Ordinance Assessment October 26, 2006 EDC PC)

Rather than legalizing and encouraging home occupations, the proposed Zoning Ordinance significantly limits home occupations. For instance, employees are not allowed based on the represented traffic concern. Other jurisdictions address traffic or other concerns, if any, with limits on number of employees, ITE trip assumptions,

non-peak hours, etc. Since this issue addresses both job and vehicle trip reductions, any analysis could, if necessary, be included in the Project Description. An analysis could include the types of occupations that may be allowed by the code and what might be the outcome of a reasonably foreseeable development of home occupations (including currently allowed and proposed to be allowed) within the County. While allowing an employee may increase traffic somewhat, the traffic experts may determine whether it makes a difference in the traffic projections, and how limitations such as peak hour restrictions would relate. Since not everyone will host a home occupation, and not all will have employees, there may be some reasonable assumptions made as to the potential traffic generation. A Request for Proposal for the environmental review could address these issues and the cost related to the permitted use, along with a Request for Proposal for the updated traffic model as part of the TIM Fee Update.

8. The Project Description should consider Industrial uses in Rural Regions. The General Plan limits Industrial lands in Rural Regions to uses which support only on-site agriculture, timber resource production, mineral extraction, or other resource utilization.

Considering there are over 1,000,000 acres in El Dorado County in the Rural Regions, while nearly all Industrial lands are in the Community Regions, Rural Commerce requires flexibility in the placement of industrial uses.

The Industrial white paper attached as **Exhibit E** proposes expansion of rural industrial into rural regions. Proposed zoning provisions will allow industrial uses in rural lands with a conditional use permit; and, like commercial, will propose more industrial zones, directing specific uses to specific and appropriate areas of the County.

9. The Project Description should consider the removal of constraints to development of commercial and moderate housing within the Community Regions. Suggested actions are addressed in more detail in the “low density residential” white paper attached as **Exhibit F**, and include:

a. **Environmental review of ROI 274-2008** to allow the Board to take action act on their intent, which was adopted by the Board on October 10, 2008, to amend GP Policies 2.2.3.1, 2.2.3.2, 2.2.5.4, and 2.2.5.13 to amend the requirement for a 30% open space requirement for residential Planned Development projects. The reason for the Board action was based on the fact that these policies prevent the implementation of GP, and state moderate housing objectives.

b. **Consideration of revision of General Plan Policy 7.1.2.1 and Mitigation Measure 5.9-4(b)** which prohibits development or disturbance of slopes exceeding 30% unless necessary for access or where reasonable use would otherwise be denied. The rationale seems to be based on erosion concerns. A significant number of other jurisdictions, along with observation of successful developments in steep areas, demonstrate that good engineering and new technological advances can successfully address this concern. Given the very limited Commercial/Mixed Use Developments and Multi-Family Residential, this constraint could be amended to allow flexibility based on good engineering and encouraged compliance with commercial and compact residential housing objectives.

c. **Wetlands setbacks should be reviewed.** On June 22, 2006 the County adopted interim interpretative guidelines for GP Policy 7.3.3.4 relating to buffers and setbacks for the protection of riparian areas and wetlands. These are to be compared to proposed zoning code section **17.30.030.H** which adopts a new standard not included in the General Plan or Interim Guidelines: “Riparian setbacks shall be measured from the edge of riparian vegetation or “top of bank”, as defined in Article 8, whichever is furthest from the water feature.” This could result in a substantial increase in the setback requirements, especially considering the subjective determination of measuring from the “edge of riparian vegetation.” This policy should be further reviewed.

d. **I’m thinking of a Color.** At the recent EDC Economic Summit, 90% of the participants were asked “if you were emperor and could make any change, what would that be?” 90 % responded, “EDC

regulations". Participants included public and quasi- public employees, financial consultants, educators, volunteer groups, and members of the Chambers of Commerce. Many added their personal experiences about the ambiguity of the regulations they were trying to comply with. The consensus of the participants was that EDC had failed to provide a clear set of standards, and defaulted to: "I'm thinking of a color", leaving the applicant working the entire color spectrum.

EDAC will present regulatory streamlining considerations to be included in the GPA/Zoning environmental review as an alternative to the present process.

10, The Project Description should allow review of General Plan Circulation Element Policies that constrain GPA Objectives. EDAC Regulatory Reform Engineering Subcommittee is working with an independent Traffic Engineer to determine how best to implement the General Plan Objectives through the Land Development Manual and Traffic Impact Mitigation Fee program. As part of the process, they are reviewing General Plan Policies to determine if amendments are necessary or if Objectives can be achieved through other implementation tools. Circulation issues considered include:

a. The El Dorado Hills Business Park is presently subject to an employment cap implemented as a result of General Plan EIR mitigation measure 5.4-1(b). A Congestion Management Plan for the Capital Southeast Connector project would be an alternative mitigation measure and should be considered.

b. The TC-1 table needs to not only reduce right of way widths, but also the intersection spacing requirements on smaller roads should be reduced.

c. TC-Xf: The last line "reasonably foreseeable projects" should be defined to include a cutoff date such as TM submittal date, Traffic Report Scope date, or something definitive. Diamond Springs has started a process of continuing to add projects to the traffic study requirements that come in long after submittal of an application. The result is a never ending loop. This is actually a loophole that allows indefinite delay of a project. For example, if I want to kill a project that my neighbor is proposing, all I have to do is come in with a map to request a high traffic use on a neighboring parcel. That forces the previous applicant into a situation of having to mitigate my project, when I'm not really serious about anything but stopping my neighbor. This makes no sense!

d. TC-Xg: This may be for another time, but DOT appears to be realizing that a transition from a reimbursement policy to a credit policy might be more advisable. With the current language, credits are not really permissible. It might be a good opportunity to alter this policy and allow DOT to figure out a way to transition to credits in the future. Complicated as that might be, at least it would be allowed. DOT believes the current language does not prohibit credits, but clarity is required.

e. TC-5a & 5b: Consider requiring sidewalks on one side of the road only, particularly on lower volume local roads. Since Settlement Agreements have been resolved in this manner, why not build it into the system so the option is available to reduce impervious area? Also, in places like the business park where some areas have sidewalks and others don't, why not deal with that issue now and provide flexibility by not requiring sidewalks on both sides of all roads.

f. Four/fifths Board Vote. Counsel is suggesting a General Plan Amendment is required.

11. EDAC supports the preparation of a Climate Action Plan (CAP) and has identified and contacted a potential funding source. CAP would not likely be made a part of the General Plan. However, it will allow the County to set its own baseline and reduction target criteria for itself and private projects. This will achieve State and local objectives while ensuring funding eligibility and project tiering opportunities with CEQA streamlining benefits. This is for every public and private project.

EDAC would be agreeable to assisting in the preparation of the plan. Discussions with planners from different counties indicate a CAP total cost of around \$ 150,000 with wide range of public input. James Caruso, Senior Planer from San Luis Obispo County is an excellent source, especially with a “bottom up” plan.

In seeking funding for a plan, EDAC discovered that PG&E provides funding through the Sierra Business Council. Attached as **Exhibit G** is an exchange of emails relating to the plan and establishing that El Dorado County could participate in the process, which also includes Placer, Plumas, Sierra, Amador and Nevada Counties as well as Placerville, Jackson, Auburn and other cities.

Depending on the timing, it may be possible for the Climate Action Plan to be analyzed within the GPA process to an extent that the environmental review for the separate CAP could tier off the GPA EIR. This would be desirable from the standpoint of cost-effectiveness, but is not the only option. Yolo County recently successfully employed a related strategy.

12. **EDAC engineers have prepared a “Land Use Forecast”.** This “Land Use Forecast” or more properly Achievable Land Use Maps in Community Regions with sewer prepared by EDAC should be characterized as a “refinement” of the earlier forecast done for the GP EIR. EDAC didn’t revise market-driven assumptions in the GP EIR. Instead it “tested” the validity of assumptions by assessing the capacity of land within the CR/RC to support the land uses allocated in the forecast, by verifying that those uses can be accommodated in CR/RC with sewer, unless constrained by other policies. This forecast may be used in at least the following ways during the Targeted General Plan Update :

a. TIM FEE MODEL UPDATE. DOT and DSD have estimated the cost of preparing a Land Use Forecast as part of the Update of the Land Use Forecast and Traffic Model at \$ 175,000 (See **Exhibit H**). EDAC traffic engineers have reviewed the information and believe the work can be incorporated into the traffic model update. EDAC proposes a Traffic Model Update that be paid from the TIM Fees. Additional information will be provided on July 25.

b. STRESS TEST. The Land Use Forecast combined with EDAC’s feasibility analysis of the locations of approximately 12,000 new dwelling units, functioned as a “stress test” . This process confirmed that approximately 75% of the 12,000 new dwelling units have been built in the Community Regions with sewer. 5% of those new dwelling units were constructed in Pollock Pines/Camino. This process showed that there is adequate achievable density in the Community Regions with sewer to accommodate 75% of the remaining 20,000 dwelling units yet to be built under the General Plan. This simply confirms the GP is “on track”. It will also enable the County to determine the remaining capacity within the road system, and the extent to which major road improvements are reasonable from a cost-benefit perspective.

c. TRAFFIC ANALYSIS FOR GPA. After EDAC has reviewed traffic hard costs, soft costs and a Test Case trip generation for Cameron Park, EDAC will work with traffic engineers and staff to propose a framework for an RFP for the traffic model update. This work may be prepared concurrent and may be incorporated into the GPA process.

EDAC RECOMMENDATIONS

EDAC recommends the Board:

1. Approve specific components and related recommended amendments so they can be carried forward into a Project Description. EDAC recommends eliminating any components that the Board has no interest in pursuing now, and allow the other components to move forward.
2. Direct staff/EDAC to conduct a CEQA Board workshop in October 2011 to focus on the potential costs of the related components in the Project Description as relates to CEQA (including traffic issues related to GPA).
3. Direct staff to schedule a public hearing with the Planning Commission on the Draft Project Description with a target return date to the Board no later than November 2011 for final approval and CEQA Review.
4. Direct staff to work with EDAC to draft an RFP for the CEQA analysis based on the proposed Project Description. Incorporate into this RFP all technical reports prepared, or to be prepared, by specialists working with EDAC. Bring the draft RFP document to the Board for review.
5. Direct staff and EDAC to draft an RFP to update the TIM Fee Model. Incorporate into this RFP all technical reports prepared, or to be prepared, by specialists working with EDAC
6. Direct staff and EDAC to report to the Board with a programmatic work plan to accomplish all DSD work plan tasks, including the Land Use Forecast for the TIM fee update model.