

# County of El Dorado

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April 10, 2007

Mr. Mike McKeever  
Executive Director  
Sacramento Area Council of Governments  
1415 L Street, Suite 300  
Sacramento, Ca 95814

RE: Proposed Regional Housing Needs Allocation (RHNA) for El Dorado County

Dear Mike:

El Dorado County appreciates the opportunity to participate in the creation of the 2008-2013 Regional Housing Needs Allocation (RHNA) plan that is currently underway by you and your staff. As you are probably aware, the County has already taken great strides to incorporate many policies and procedures to assist in meeting the housing needs of our current and future residents, and recognizes its responsibility to provide opportunities for development of housing for all economic segments of the community.

However, upon reviewing the proposed/draft allocations received at the SACOG Planning meeting held on February 21, 2007, our staff has determined that the proposed allocation for El Dorado County, relative to the rest of the SACOG region appears to be disproportionately high, especially in comparison to the current planning period. We understand that your staff is still working on revisions to the methodology for allocating units; however, this is a serious issue that needs immediate attention.

We question how SACOG staff can justify almost doubling the amount of units from our 2001 allocation in all income categories, even with the knowledge of El Dorado County's unique constraints as discussed with your staff in a meeting held on January 12, 2007, at our offices.

In addition, an analysis of the worksheets provided by SACOG appears to show that El Dorado County will be the only county in the region with an increase in its regional share from the previous allocation. Each of the other counties is being afforded a decrease in their overall share even though those jurisdictions generally have far fewer constraints on development than exist in El Dorado County (for example, approximately 60% of El Dorado County is off-limits to development due to federal ownership and a significant portion of the remaining area of the County is subject to regulation by the Tahoe Regional Planning Agency which has very stringent limits on new development). A comparison table of the existing 2007 and currently proposed 2013 allocations for El Dorado County is below.

	<b>2006-2013 Draft Unincorporated El Dorado County RHNA Allocation</b>		<b>2000-2007 Unincorporated El Dorado County RHNA Allocation</b>	
<b>Income Levels</b>	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
Very Low-Income	4,818	30.1%	2,477	29.3%
Low-Income	3,456	21.6%	1,629	19.3%
Moderate-Income	3,002	18.8%	1,811	21.5%
Above Moderate-Income	4,717	29.5%	2,528	29.9%
<b>Total</b>	<b>15,993</b>	<b>100%</b>	<b>8,445</b>	<b>100%</b>
<b>Units per Year</b>	<b>2,284 units per year</b>		<b>1,206 units per year</b>	

What was even more surprising was to see Sacramento County receiving the largest proportional **decrease** in its regional share compared with the previous planning period. This seems to go against the principles established through the Blue Print project that SACOG has championed over the past few years. It would seem more appropriate to allocate the bulk of new housing development within urban areas where this type of density can be more readily absorbed and sustained.

El Dorado County adopted its new General Plan in July 2004 and has only just begun to implement the Plan after litigation surrounding plan adoption was finally resolved last year. Should the proposed draft allocation be the final allocation issued by SACOG, it would require El Dorado County to implement a comprehensive revision not only to the Land Use Element of the General Plan but also many of the other elements that include policies that regulate the growth of the County. This would be an undue burden on the County, resulting in a barrier to implement the General Plan as approved by the Board of Supervisors and ratified by the voters of El Dorado County. It would also place a fiscal burden on the County which we find unnecessary.

We respectfully request that your staff continue to work together with the County staff to create a workable allocation for our County taking into account El Dorado County's special circumstances and geographical constraints.

Sincerely,

HELEN K. BAUMANN

Chairman

El Dorado County Board of Supervisors

cc: El Dorado County Board of Supervisors  
El Dorado County Planning Commission

## **El Dorado County Constraints For Meeting RHNA Numbers**

- **General Plan Requirements**

- Limitation in growth potential with more than 60% of the County under public ownership.
- General Plan requires growth to be directed to Community Regions and Rural Centers within the County which currently could not absorb the proposed allocation.
- Emphasis on natural resource conservation in the General Plan including: the Rare Plant Mitigation Areas, Oak Woodlands, Important Biological Corridors. The extent of areas that will be designated for conservation will be determined through the Integrated Natural Resource Management Plan (INRMP) process that will begin this year.
- The County has resolved to preserve, protect and potentially expand Agriculture Lands.
- The County's hilly terrain is a constraint to large residential developments, including a General Plan policy that limits development on slopes over 30%.
- The County General Plan includes strict concurrency requirements to ensure that new development fully mitigates infrastructure and transportation impacts limiting use of tax-payer funding.
- Required setbacks from streams and waterways are a constraint to many residential lands.
- El Dorado County has planned for future development through a Capital Improvement Plan (CIP) that is updated every 5 years. This plan doesn't include consideration for anticipated roads and infrastructure capacity (CIP) to meet the proposed RHNA and will require substantial revisions to the County's Transportation Impact Mitigation Fee program.
- Limitation on available water to serve growth over and above planned levels.
- Asbestos is located in some of El Dorado County's most developable lands and can increase the cost of development because of the County's strict zero dust tolerance requirements therefore impacting the ability to achieve affordability.
- Requirement to preserve significant historical and Native American sites which occur throughout the County.

- **Residential Market**

- Residential development is not anticipated to reach proposed RHNA levels in El Dorado County based on average units actually developed per year over the past 10 years.

- **Other Areas of Conflict**

- Jobs will not grow at same rate causing an imbalance in the Jobs/Housing relationship ultimately impacting traffic congestion.
- There is a limitation on considering any residential development in the EDH Business Park due to requirements of the initial financing of the Park.
- It is already anticipated that the current General Plan has over allocated multifamily residential in areas such as Diamond Springs, El Dorado and Cameron Park, some of only a few areas in the County that have access to adequate roads and services. To increase the concentration may be detrimental to those communities and place undue impacts on the infrastructure and services.
- Lack of available land in the El Dorado Hills area due to previously approved development plans.
- New State regulations for development interface in fire/wild land areas will impact siting and costs of new development within the County due to the County's extensive forested lands.
- State law that does not allow higher density development around Airports such as the one in Cameron Park excluding such areas as an option for future development.