Handed out at mtg PC 11/13/08 #11

## El Dorado County Farm Bureau Comments to Planning Commission - November 13, 2008

## Proposed MUD General Plan Amendment A008-001

 <u>Comment:</u> This Mixed Use Development (MUD) proposal would apply to the Camino/Pollock Pines and Diamond Springs/El Dorado areas which are agricultural in nature. The definition of Community Region is inconsistent with these areas being designated as such.

<u>Action Requested</u>: Camino, Pollock Pines, and El Dorado should be re-classified as Rural Centers instead of Community Regions. Request a General Plan Amendment be initiated.

 <u>Comment</u>: The environmental checklist does not identify the impacts to agriculture of amending the MUD density for dwelling units in a community region. It states that there is no significant impact to agriculture and refers back to the environmental analysis performed for the Floor to Area (FAR) Ratio Amendment. The FAR environmental analysis specifically excluded Agriculture & Forestry from its study, which is appropriate for commercial development. However, this amendment increases the dwelling unit capacities on lands adjacent to agriculture.

<u>Action Requested:</u> Study the impact to agriculture in the Camino, Pollock Pines, and El Dorado areas, which could be significant, and identify mitigation measures necessary to lower the impact to less than significant.

<u>Comment:</u> The creation of additional dwelling units adjacent to agricultural land in a
community region that is located in an agricultural district creates incompatibilities with
agricultural uses. This is inconsistent with buffering and other agricultural protection
policies. Specific mitigations that address agricultural/urban conflicts, including
horizontal vs. vertical development, need to be included.

<u>Action Requested:</u> Study the impacts to agricultural use of adding residential densities adjacent to agricultural lands. Mitigate, including buffers, to less than significant. Restrict the vertical development in agricultural areas.

• <u>Comment:</u> The environmental checklist does not include the impact to visual resources in a scenic corridor.

<u>Action Requested:</u> Analyze the impact of MUD in the Camino/Pollock Pines area which are included in the scenic corridor. Recommend mitigation measures that lessen its significance.

<u>Conclusion</u>: Clearly, the Community Regions were intended to address commercial and suburban development in areas that have the necessary infrastructure and demand. This amendment fails to address the impacts to agricultural lands that occur within Community Regions. We request this amendment be tabled until it is adequately studied and we request a separate General Plan amendment to re-classify the Community Regions above to Rural Centers.

PC 11/13/08



Peter N Maurer/PV/EDC 11/12/2008 01:19 PM

To johnrknight@comcast.net, syrah@sierravistawinery.com, machadodavid@sbcglobal.net, walter@waltermathews.com, atolhurst arch@yahoo.com

cc spurvines@co.el-dorado.ca.us, Charlene M Tim/PV/EDC@TCP

bcc

Subject Fw: General Plan Amendment/Mixed-Use Development/Planning Comm. Meeting

FYI re tomorrow's hearing on MUD. - Peter

Forwarded by Peter N Maurer/PV/EDC on 11/12/2008 01:17 PM ----



**David Thomas** <thomasdavid@mac.com> 11/12/2008 12:07 PM

To pmaurer@co.el-dorado.ca.us

CC

Subject General Plan Amendment/Mixed-Use Development/Planning Comm. Meeting

Peter Maurer Principal Planner **Development Services** El Dorado County

Re: Mixed-Use Development

Dear Peter,

Although I am unable to attend tomorrows Planning Commission Meeting I would like to have the Commission consider eliminating the paragraph (17.14.220 -C-2-c) which now reads as follows; "Construction of the residential development and issuance of a certificate of occupancy shall occur following or concurrently with construction of the commercial development of the

As you are aware of we own a commercial parcel in the Coloma/Lotus Rural Center. With extensive analysis on the feasibility of developing any commercial property in this community we have found that there is no way to now or in the near future make the significant financial investment in commercial infrastructure that is economically viable. The Coloma/Lotus Valley is a wonderful place but as we all know, it is a classic seasonal economy. This economic surge is not enough to accommodate any but the riskiest commercial investment. I would estimate that the annual vacancy rate in the area is consistently around 25-30% and possibly higher. Having the requirement that we develop more commercial space in a small community as ours would surely compromise the infrastructure already here and vacant. I see this as an inherent liability in a already marginalized sustainable community.

By allowing residential construction prior to commercial construction in a Mixed-Use Development, in a Rural Center, we would be allowed to develop a quality project that would not only make economic sense but be an asset to the community at large. Only when more residential housing is in place will any commercial development be viable.

I would hope the Planning Commission will consider the constraints that paragraph (17.14.220

-C-2-c) puts on small seasonal Rural Centers like Coloma and the forward thinking quality development that could occur without this constraint. As stated in 17.14.220 Mixed-Use Development

A. "Purpose and Intent. The purpose of this chapter is to provide housing and employment opportunities in close proximity in order to more fully and efficiently utilize available land in rural centers and planned communities. It is further the intent of this section to encourage the development of affordable housing and pedestrian-oriented communities, to maintain access to commercial businesses, to enhance the core areas of existing community and rural centers, and to provide incentives for such development."

By eliminating this constraint on Mixed-Use Developments, rural centers like ours can move on towards quality, economically sustainable projects that will in the end, build community.

Sincerely,

## david thomas

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