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**Comment on Draft El Dorado County Board of Supervisors Policy for a
GENERAL PLAN AMENDMENT INITIATION PROCESS
by Shingle Springs Community Alliance, Stop Tilden Park and No San Stino**

Shingle Springs Community Alliance (SSCA), Stop Tilden Park (STP) and No San Stino (NSS) are grass-roots, community-based not-for-profit unincorporated citizen associations primarily composed of residents and property owners in Shingle Springs. In response to the request for comment on a proposed Board of Supervisors Policy to establish a procedure for early review of privately initiated General Plan Amendments, Specific Plans or Specific Plan Amendments published by the County of El Dorado, SSCA, STP and NSS respectfully submit the following comments.

The proposed policy, that would be retroactive to include review of all currently submitted pending development project proposals that include General Plan Amendments, Specific Plans or Specific Plan Amendments, will bring a critically needed early high level review of project consistency with important General Plan Policies that will help insure the integrity of the General Plan and its orderly implementation. By creating the opportunity to forestall premature or ill-advised projects that threaten to overwhelm and distort carefully thought-out policies for balanced and orderly growth in keeping with the policy priorities of the General Plan, the proposed policy is a major step forward in assuring responsible development for the future of El Dorado County. SSCA, STP, and NSS strongly support adoption of the policy at the Board's earliest opportunity.

We note with approval that the policy review for initiation of a General Plan Amendment will apply to all projects, regardless of whether or not the proposed project is located within a Community Region Line or Rural Center. As we previously pointed out in commenting for the Workshop on Community Region Line Revisions, a serious weakness in the current General Plan CRL policy is the lack of linkage between land use designations, infrastructure planning and the extent of CRL areas comprised of low and medium density land use designations. Early review to evaluate the extent to which adequate infrastructure is either actually in place or that infrastructure expansion projects are fully planned (with environmental reviews completed and financing in place) for construction of the infrastructure in advance of or concurrent with project development, as we suggest will go a long way to mending that flaw.

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There are, however, a number of modifications to the proposed policy that would strengthen it in achieving its stated purpose and guide its application with reference to many important policies in the General Plan.

- a) *Presumptive denial of any General Plan Amendment for a residential, commercial or industrial urban or suburban type development project outside of Community Region Lines or Rural Centers as established in the General Plan or as they may be amended by Board initiative.*

Without a strong policy discouraging private development proposals outside of CRLs or Rural Centers, the intent of the General Plan that these designated areas should serve as urban limit lines is virtually meaningless. If privately initiated General Plan amendments can readily modify CRLs or Rural Center boundaries, the purpose of channeling development within CRLs or Rural Centers is defeated. Modification of CRLs or Rural Center Boundaries should be reserved exclusively to Board of Supervisors initiative. *Expansion* of CRL or Rural Center boundaries should be limited so that they would only be considered as part of regular five-year reviews of the General Plan, and only approved if there is compelling evidence that the General Plan policies cannot be achieved unless additional land must be included within CRLs or Rural Centers.

- b) *Specific thresholds for infrastructure to be in place, or financed exclusively by development-secured funding, should be part of the criteria for consideration of proposed General Plan Amendments.*
 - i. No General Plan Amendment should be given initial approval unless there are sufficient existing water and sewer connections available to serve the project as stated in EID's most recent annual report. Exceptions should be considered only if developers make adequate arrangements to secure full funding of the cost of any system expansions necessary to serve the project without risk to current EID ratepayers.
 - ii. Consideration should be given to a policy reserving current EID water and sewer capacity for highest priority long-term, locally-based job growth and commercial sales-tax generating projects.
 - iii. No General Plan Amendment should be given initial approval unless the Travel Demand Model and/or other reliable expert analysis demonstrates that no LOS F traffic conditions will be created as a result of the project.

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El Dorado County land use authority and responsibility for planning and development of critical water and sewer infrastructure essential to any urban or suburban type development is divided between the Board of Supervisors and El Dorado Irrigation District (EID). The Board can use its land use authority to more effectively coordinate development proposals with planning and financing of water and sewer infrastructure projects to assure that developer financing is in place for system expansion needed to accommodate planned growth, rather than exposing existing EID ratepayers to the risk that rates and Facilities Capital Charges (FCCs) collections fall short of the revenue needed to service EID bonds, resulting in financing-induced rate increases, as has recently occurred.

El Dorado County has a serious and growing imbalance between housing and jobs. The County also suffers from significant economic loss due to residents having to travel outside of the county for shopping opportunities. First priority for use of the current extremely limited supply of public water connections should be given to projects that address those problems, and support locally-based, living-wage jobs. Reserving some of the existing capacity for those projects will prevent the available supply being exhausted by even more residential projects that will only exacerbate the jobs/housing imbalance and sales tax hemorrhage.

As a final comment, because of the significance of any General Plan Amendment for the delicate balance of resources and multiple policy issues involved, we oppose exemptions for small projects, whether for projects below a certain acreage or below a certain number of dwelling units. Such a policy would result in multiple proposed amendments that would cumulatively be more damaging to sound planning.

In addition to supporting the proposed General Plan Initiation Process (preferably with the modifications suggested in these comments), SSCA, STP and NSS will continue to advocate for an adjustment of the CRL in the Shingle Springs area to a smaller Rural Center or Town Core Area designation. EID's IWRMP and IWWMP demand projections are based on the current General Plan land use designations and Zoning Ordinance densities. The limits of both the existing and EID planned water and sewer infrastructure will not support the potential large increase in high-intensity compact urban and suburban type development that the current extensive area of the CRL encourages. SSCA, STP and NSS are engaging the Shingle Springs Community in an update of the 1977 Shingle Springs Community Area Plan that will serve as the best vision for the future of Shingle Springs as a predominantly rural community. We expect to bring our new Shingle Springs Community Area Plan forward for consideration by the Board of Supervisors in the next few months.

SSCA-STP-NSS Comment on BOS GPA Initiation Process Proposal

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Thank you for the opportunity to comment on the proposed General Plan Initiation Process policy. Rest assured that SSCA, STP and NSS will continue to inform, engage and mobilize the Shingle Springs community in critical land use issues that impact the quality of life in Shingle Springs.