

Section 2.7 – Growth Inducement



“In guiding growth and development, the General Plan recognizes that Calaveras County is made up of small communities, each with its own unique character, surrounded by agricultural lands, working forests, wildlands, and large expanses of publicly managed forest and recreation lands.”

(Introduction, Calaveras County Draft General Plan, Page INT-1)

“Growth-inducing impacts must also be analyzed. These may include any policies, proposals, and programs of the general plan likely to stimulate community growth and development. Examples include plans for street and highway improvements in undeveloped areas, a proposal for wastewater treatment plant expansion, and proposals for the expansion of employment in basic industries, any of which is likely to increase pressure for or facilitate residential and other development.”

(State of California, Office of Planning and Research, Draft General Plan Guidelines, p. 320)

I. Background and Setting

In evaluating the growth inducing impacts of the proposed General Plan, there are competing and contradictory trajectories to consider.

1. The lack of specificity in the plan. “When practical, the General plan will be as general as possible, rather than specific, favoring flexibility and adaptability.” General Plan Introduction, page INT-1. This makes it difficult to assess what, exactly, will unfold as new development arises. Furthermore, for the project description of the general plan to be adequate, it must provide enough specificity to allow for the evaluation of

environmental impacts. (CEQA Guidelines, sec. 15124.) Similarly, for provisions in the general plan promising future action to qualify as mitigation measures, the County must commit to implementing measures to achieve specified performance standards. (CEQA Guidelines, sec. 15126.4, subd. (a)(1)(B).) Thus, it is not “practical” for a general plan to be as vague as the current draft.

2. The estimated buildout or carrying capacity implied by the land use maps in the General Plan project the possibility of population and building well beyond the population estimates for the county. If we need only half of that new capacity, then how will decisions be made about which parcels are most suitable for future subdivision and development?

From Calaveras County Notice of Preparation for the General Plan EIR, page 3:

An estimate of how many units and population could be accommodated by the most recent version of the General Plan Land Use Map was developed by the County using the County’s GIS database system. This estimate is known as “carrying capacity” and represents how much development could occur within the County over the life of the General Plan (2035) using a set of described parameters. The “carrying capacity” does not represent actual buildout nor does the estimate express with any certainty what will in fact occur. Rather, “carrying capacity” is simply a way to understand the development potential of the land use map.

A buildout formula was assigned for each General Plan land use designation that accommodates residential units. Next, buildout was calculated for the maximum density of each land use category. The assumed percent buildout for each land use was based on a report provided to the Board of Supervisors. Table 1 indicates the carrying capacity for all residential land use areas in the County, excluding lands within the City of Angels city limits.

Table 2 shows a comparison between existing and potential population under three different scenarios – the current 1996 General Plan, the proposed General Plan Update, and the Department of Finance (DOF) projections for 2035. Based on 2010 census data, currently 45,578 persons reside in Calaveras County, including Angels Camp. For Year 2035, the General Plan horizon year, DOF projects a modest population increase – 9,963 persons – for a total of 55,541 persons. This equates to an annual increment of 399 persons per year. The table illustrates that adequate carrying capacity exists under the proposed General Plan Update to accommodate the projected DOF population for Year 2035. The proposed Plan could accommodate approximately 111,527 persons, approximately double what DOF projects for Year 2035. By comparison, the existing General Plan would accommodate approximately 322,900 persons, almost five times the DOF projections.”

There is an effort to modify this buildout estimate in the Land Use element, page LU-3:

There is approximately 519,000 acres of vacant, privately held land in the unincorporated part of Calaveras County. The 2014 Draft Land Use Map divided this into numerous land use designations, ranging from Industrial, Commercial, Residential High Density, Rural Residential to Resource Production. Table LU-1 has a complete list and description of the different Land Use Designations. One purpose of the plan is to provide for adequate land to accommodate anticipated growth, and to direct that growth to the areas most suited for development. Totaling all development potential of the vacant parcels yields a maximum potential 51,688 new dwelling units. In addition there are 3810 units previously approved, but undeveloped, in the specific plan areas near Copperopolis. It is unlikely, that most lots will develop at their maximum capacity. For a variety of reasons, most parcels cannot be fully developed. These include topographical or other physical constraints, environmental constraints such as wetlands or endangered species habitat, desirability of the site for development, or simply the land owners' desire to develop the land or not.

The likelihood of full development of a vacant parcel to the maximum extent possible is then reduced based on these factors. Residential development in the mixed use, Community Center designations is probably only 20% of maximum potential, Most residential designations are likely to build out at 50% based upon historic trends and a review of development constraints of those areas, and working lands at 30%. Resource Production includes all lands designated as Timber Production Zones and under Williamson Act Contract, so those are likely to develop at a much lower rate so no density was attributed to that land use category, although land can still be developed and homes built. As a result of these reductions, a more likely buildout scenario is approximately 23,000 new units. At the current census rate of 2.41 persons per household, this could accommodate over 56,000 new residents.”

So, in the land use designations there is potential for 111,000 people. There is a projection for a population of over 55,000 by 2035. And an assessment that because of many factors most parcels won't build out, there will more likely be buildout at 23,000 residences for over 56,000 people. Should some effort be made to quantify just what level of buildout could, in reality, occur? Wouldn't that be a factor in assessing growth inducement? With land use decisions that at least on paper indicate the potential for twice as much population growth as we would likely have, is that not a growth inducing factor?

3. And yet, the General Plan states: “New development will pay the costs of providing adequate additional infrastructure and services necessitated by development, including roads, water, sewage disposal, and services such as schools, police, and fire protection, without reducing the level of service enjoyed by existing communities.” General Plan Introduction, page INT-2. The implication is that additional infrastructure will not be provided unless new development demands it and is willing to pay for it. Would this be

an enticement for developers to want to do business in our county or a deterrent? Granted that this implies the residents of the new development will also pay for this with taxes and fees, but many new developments are created with no guarantee that the people will come. Does this requirement, along with the current state of county infrastructure, actually inhibit growth?

II. Impact Analysis

So. We are going to be as vague as possible, create a land use map that allows for twice the growth we can reasonably be expected to have, but state that most of that can't realistically happen, and that whatever does happen will be paid for by new development.

And, we already have current limitations to growth: communities with limited water hookups, communities with sewer at capacity, failing wells, roads and bridges far behind in repairs.

The question may be: Does the proposed General Plan and its individual policies induce growth or discourage growth?

In looking at some specific policies we can see how lack of specificity makes it difficult to assess the degree of impact:

LU 1.1 Maintain an adequate supply of appropriately designated land of varying parcel sizes and locations to accommodate growth within each land use designation. (IM LU-5G)

How is an "adequate supply" of designated land uses determined? By whom? What is the standard that must be met for a supply to be "adequate"?

LU 3.4 Infrastructure such as water and sewer and high capacity roads shall be encouraged within existing developed areas, areas contiguous to existing communities, areas where future development is anticipated by the General Plan as reflected in the General Plan land use map, existing, non-contiguous communities, and/or where essential to public health and safety. (IM LU-3C)

How does this limit infrastructure from being extended to undeveloped areas, thus encouraging development to extend beyond community centers? This policy is clearly growth inducing.

LU 5.4 Encourage attraction of new compatible business and industry to the county. (IM LU-5B and LU-5G)

To what extent? Large businesses that will require an influx of workers with housing needs? Who defines compatible?

Note that is not permissible to simply assume lower buildout levels, to understate potential plan impacts, and to under-mitigate potential plan impacts. This is especially true in this instance, in which the general plan refuses to make specific commitments to abide by objective development

limitations, and insists on providing great flexibility to approve projects despite the constraints of the land, the infrastructure, and conflicting neighboring land uses. If the DEIR is evaluating impacts of a presumed lower buildout level, then there must be mitigation measures in the plan to keep development from exceeding those lower buildout levels.

III. Mitigation and Alternatives

To compensate for what seems to be a very vague indication of the actual possibilities of growth, it will be necessary to place some useful guidelines. Please consider the following policies to be added to the General Plan:

LUA: Create specific criteria that would need to be met in order to permit any proposed new residential development outside of community center areas. (What would be factors that would make it desirable to build in any area beyond the reach of town centered infrastructure and services? Some possibilities: available water, no added impact to roads and traffic, sewer service, no impact to ag. uses.)

LUB: Create specific criteria that would need to be satisfied in order to expand the community center boundaries beyond their current lines. (When has growth become so limited within the community boundary that it must be enlarged? What percentage of community buildout must be achieved before the boundaries are expanded? Or what percentage of infill parcels remain available?)

Also, as noted above, include mitigation measures that limit growth to the lower buildout levels presumed in the DEIR impact analyses. Commit to updating the general plan and its impact mitigation before committing to levels of development that exceed the presumed buildout levels.