Section 5: Policies from draft optional elements for including in GPU text.

During the GPU process, the County had three optional elements drafted that the Board of Supervisors later decided to eliminate from the list of stand-alone elements. These are the Economic Development Element, the Energy Element, and the Water Element. In part these elements were eliminated from the GPU process to avoid the time and expense associated with their editing and completion. However, the Planning Department made it clear that it would consider moving some of the critical policy provisions from these elements into the mandatory elements of the GPU. This recognizes that issues like energy and water must be addressed in the Conservation Element. This also recognizes that the County's indispensable role in infrastructure construction, development approval, workforce housing, public transportation, and law enforcement have a huge affect on economic development.

In this section of our comments, the CPC makes its first attempt to accept the Planning Department's challenge to identify the critical policies from these eliminated elements that need to find a home in mandatory elements of the GPU text. Cognizant of the County's desire to limit delays and expenses, at this time we are trying to be very reserved in our recommendations to include additional policies in the GPU from these

eliminated elements. After the Public Review Draft GPU text is released, we may find that additional policies from these eliminated elements are needed to fill gaps. After the GPU DEIR is released, we may find that still more of these policies are needed to mitigate the potentially significant impacts of development under the GPU. Thus, we reserve the option to add to the preliminary list we provide here.

In the latest stages of the GPU process, the County has expressed a few concerns regarding GPU policies. One concern is that the County does not want to make commitments that it cannot meet, or that are outside of its jurisdiction to achieve. A second concern is, when a county department does have jurisdiction to implement a policy, that the correct County Department is identified in the policy or implementation measure. A third concern is that the County may not have the funding source or staff to implement some desirable policies. We at the CPC are willing to assist the County in solving these problems with regard to any of the policies identified below. **We respectfully request that the Planning Department identify for us the policies below that it is willing to recommend to the Board of Supervisors for inclusion in the GPU text, and also to identify those policies we need to fix to make them suitable for a recommendation of inclusion.**

A) Draft Water Element policies for inclusion in the GPU text.

We have included as an attachment to these comments, a version of the Draft Water Element that had redlined edits from the Foothill Conservancy. (Attachment 7.) We are recommending that version of the policies for inclusion in the GPU text.

The first set of policies we recommend for inclusion go directly to the County's responsibilities in project review, project conditioning, and project approval. If the County does not take on these responsibilities, there is no other agency with jurisdiction to do so.

Policy 1.5 Sufficient Water Supply for New Residential Development
Policy 1.6 Sufficient Water Supply for New Non-Residential Development
Policy 1.9 Adequate Facilities and Services
Policy 1.10 Fire Protection Standards for new development
Policy 1.12 Development Impacts to Existing Infrastructure
Policy 1.14 New Community Water Systems.
Implementation Program 5
Policy 2.8 Sustainable Landscaping
Policy 5.1 Adequate Facilities and Services
Policy 5.2 Sewer Service Approval
Policy 5.3 Alternative Wastewater System Approval
Policy 5.4 Individual On-Site Wastewater Treatment System Permitting
Policy 6.5 Watershed Protection
Policy 6.9 Building Setback Lines
Policy 7.3 Best Management Practices

Policy 7.5 Runoff Quality
Policy 7.6 Natural Drainage Systems
Policy 7.8 Flood Zone Compliance

The next policies go directly to the requirement in the MAC IRWMP that water planning and land use planning authorities cooperate and collaborate. Unless CCWD can demonstrate such cooperation and collaboration, it will not be eligible for the state funding it seeks to construct and maintain its infrastructure.

Implementation Program 3
Policy 8.1 Water and Wastewater Infrastructure
Policy 8.3 Funding Sources
Implementation Program 20

The next policies deal with recreation and open space issues commonly associated with general plans.

New Program: Golf Course Irrigation with reclaimed water.
New Program: Support for Wild & Scenic Designation for the Mokelumne River.
Policy 10.2 Public Access in New Development

The last policy deals with fire safety; a key general plan concern.

Policy 4.4 Wildfire Risk Reduction

That very painful editing exercise just reduced 20 pages of Draft Water Element down to 25 policies and implementation measures. We hope that the Planning Department will show its appreciation for this sacrifice by recommending these policies and implementation measures for inclusion in the GPU text.

B) Draft Energy Element policies for inclusion in the GPU text.

We have included a copy of the Draft Energy Element as an attachment to these comments. (See Attachment 8.) We recommend the following policies for inclusion in the GPU text.

The first policies go directly to the County's project review, project conditioning, and project approval functions. If the County does not take on these responsibilities, there is no other agency with jurisdiction to do so.

EE-1.2 Energy Supply
Implementation Program EE-1-iv
EE-5-1 Renewable Energy Resources
Implementation Program EE-5-ii

The second policy deals with greenhouse gas reduction efforts. As noted in our previous comments, the State of California has sued other Counties that failed to include some general plan policies to address global climate change mitigation and adaptation. The County should adopt such policies.

EE-1.5 Greenhouse Gas Reduction Efforts
Implementation Program EE-1-i
Implementation Program EE-1-x

The third policy and its implementation programs address County's code compliance efforts.

EE-2.1 Code Compliance
Implementation Program EE-2-i
Implementation Program EE-2-ii
Implementation Program EE-2-v
Implementation Program EE-2-vii

The fourth policy and its implementation programs directly address the County's management of its own facilities.

EE-3.2 Municipal Standards
Implementation Program EE-3-v
Implementation Program EE-3-vii
Implementation Program EE-3-x

The final policy deals with a Circulation Element issue.

EE-4.4 Vehicle Miles Traveled

That very painful editing exercise just reduced 11 pages of Draft Energy Element down to 17 policies and implementation measures. We hope that the Planning Department will show its appreciation for this sacrifice by recommending these policies and implementation measures for inclusion in the GPU text.

C) Some Economic Development Element Policies should be included in the GPU text.

We have included a copy of the Draft Economic Development Element as an attachment to these comments. (See Attachment 9.) We recommend the following policies for inclusion in the GPU text.

The first set of policies and programs address the physical infrastructure needed for economic development.

ED-2.5 New Employment Centers
ED-3.6 Tourism and Travel

The second set of policies support the community-centered development pattern described in the Draft Land Use Designations and depicted on the Draft Land Use Map.

ED-4.2 Retail and Entertainment Centers
ED-4.3 Neighborhood Shopping Centers
ED-4.4 Commercial Developments
ED-5.2 Revitalization of Employment Centers
ED-5.3 Renovation and Reuse of Existing Sites

That very painful editing exercise just reduced 15 pages of Draft Economic Development Element down to 7 policies. We hope that the Planning Department will show its appreciation for this sacrifice by recommending these policies for inclusion in the GPU text.