



P.O. Box 935, San Andreas, CA 95249 • (209) 772-1463 • www.calaverascap.com

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Contact: Jenny Fuqua

jennyfuqua19@gmail.com

(209)559-2455

August 20, 2018

DEIR Commenters call for Mitigation of General Plan Impacts

San Andreas. Agencies, organizations, and individuals delivered voluminous comments on the Draft General Plan Draft Environmental Impact Report (DEIR) to the Planning Department before the deadline on Monday August 13. Many requested that the County mitigate the 25 potentially significant impacts of the Draft General Plan.

The Draft General Plan is the County's effort to designate lands and adopt programs for housing, commercial, industrial and infrastructure development; as well as for public peace, safety, and resource conservation through the year 2035. The Draft EIR is supposed to identify mitigation measures and alternatives to reduce the potentially significant impacts of development allowed under the Draft General Plan. However, commenters on the DEIR noted that the document failed to consider many feasible mitigation measures, and instead just accepted that the significant impacts would be "unavoidable."

The 148-page volume of comments submitted by the Calaveras Planning Coalition found fault with the Draft General Plan's "pervasive lack of commitment in its policies," and urged the County to produce a final EIR and general plan that include commitments to reduce the impacts of future development on county roads, forest, ranches, historic towns, and scenic resources.

The Calaveras Planning Coalition (CPC) is a diverse group laser-focused on bringing Calaveras County residents together to plan for their future as the Planning Commission and Board of Supervisors work to update our County General Plan. The CPC seeks to balance the conservation of local agricultural, natural and historic resources with the need to provide jobs, housing, safety and services. The cover letter of the CPC comments invites the County to draft a general plan "to preserve housing value and freedom of movement, to protect the peace and safety of communities; to defend our forest, range and recreational lands, and to restore economic opportunity."

The California Department of Fish and Wildlife (CDFW) spelled out for the County the level of specificity and commitment required in mitigation measures. "Mitigation measures should establish performance standards to evaluate the success of the proposed mitigation, provide a range of options to achieve the performance standards, and must commit the lead agency to successful completion of the mitigation. Mitigation measures should also describe when the mitigation will be implemented, and explain why the measure is feasible. CDFW recommends that the environmental document include measures that are enforceable and do not defer the details of the mitigation to the future." The California Department of Conservation added, "All mitigation measures that are potentially feasible should be considered."

Multiple commenters expressed the need for the County to adopt mitigation measures to reduce the proposed general plan's impacts on agricultural lands being taken out of production and converted to other developed uses. The California Department of Conservation asked the County to "consider the adoption of an agricultural land mitigation program" to effectively mitigate impacts, adding "Agricultural conservation easements are an available mitigation tool that the County should consider." The Calaveras Local Agency Formation Commission

(LAFCO) agreed, indicating that LAFCO recommends the use of conservation easements and buffers as mitigation for projects that convert agricultural land to other developed uses. The Calaveras Planning Coalition (CPC) reminded the County that the CPC previously provided examples of agricultural land conservation programs already being successfully implemented in nine other California counties. These comments all echo those which the Calaveras Ag Coalition has repeatedly submitted to the County since 2009.

Traffic Congestion on roads is rated from Level of Service A – F. The CPC group disagreed with the Draft General Plan allowing the worst Level of Service D traffic congestion on 13 segments of the State Highways, calling instead for a congestion management plan, and/or allowing only minor breaches of Level of Service C. The group also asked the County to make a commitment to improve roads used for emergency evacuation.

The Central Sierra Environmental Resource Center (CSERC) sent in two comments on the DEIR, both relating to impact mitigation. A letter from CSERC's attorney, Ellison Folk, noted that, "the DEIR identifies vague, unenforceable, and noncommittal policies and programs as mitigation measures for significant impacts." To help the County correct this error, a separate letter from CSERC's expert natural science staff listed mitigation measures to reduce impacts to oak woodlands, riparian woodlands, wildlife movement corridors, and streams.

Comments from the CPC organization call for each local community to have a say in its future development, through community plans, design guidelines, and design review committees. These comments were backed up by a petition and photos of people who support community plans. Many of the current and draft community plans, painstakingly negotiated over the years to address unique community needs, would be eliminated entirely if the County adopts the proposed Draft General Plan. These plans cover the areas of Arnold, Murphys, Avery/Hathaway Pines, Copperopolis and Valley Springs. Other community plans were edited, condensed, and summarized in the Draft General Plan. These include the plans for San Andreas, the communities of Supervisor District 2, and Rancho Calaveras, which will lose its Special Plan.

The CPC urges the County to produce a final EIR and general plan that commit to reducing impacts of future development, and that provide a balanced planning vision and pathway forward for the coming decades. The next step in the process is for the County to respond to all Draft EIR comments in writing in the Final EIR.