



February 27, 2023

Chuck Beatty
Planning Director
810 Court St.
Jackson, CA 95642
(Sent by Email: planning@amadorgov.org)

RE: Scoping Comments in Response to Wicklow Way Specific Plan NOP

Dear Sir,

Thank you for the opportunity to provide scoping comments for the proposed Wicklow Way Specific Plan (SP) Draft Environmental Impact Report (DEIR).

I. Project Description

The proposed SP for the 201-acre site calls for 700 units of housing, open space, parks, a civic center, community-serving commercial uses, an elementary school, roads and utilities. We applaud the inclusion of ample open space, community-serving commercial components, and low- and medium-density housing options, as well as proposed adoption of design guidelines.

The project description needs much more detail to permit accurate analysis in the DEIR. It is essential to disclose the County's objectives, purpose, and need for this project. Agencies and the public need to know these so they can properly evaluate the proposed SP and identify feasible alternatives. We request that the project description address the items below:

- Wastewater treatment. Please consult with ARSA regarding feasibility of expanding the capacity of their Sutter Creek treatment plant that already serves Martell. This could meet the needs of the SP, free up land for other productive uses, and help resolve existing service constraints.
- Civic Center. A more complete explanation of this feature of the SP is needed so impacts can be evaluated, including which (if any) offices would be relocated.
- Open Space. Please consider placing conservation easements on designated open spaces to prevent their conversion to other uses in future and include hiking/walking trails.
- Housing mix. The county has expressed a priority need for affordable workforce housing. FC suggests removing low-density residential (LDR) development from the SP as the market has been able to effectively provide LDR units. The 420 units of high- and medium-density (HDR and MDR) residential units should be designated for the very-low, low, and moderate-income housing envisioned in the Housing Element and the SB-2 grant program. Please identify deed restrictions or other measures that will be implemented to ensure that housing affordability will be preserved in the long term.

- Elementary School. Describe consistency with ACUSD’s school consolidation plan.
- Stormwater Management. More detail is needed on how stormwater from the plan area will be accommodated, how and where it will be retained/drained from the site, and whether the substation and lift station are sufficiently above the floodplain of the creek.
- Pedestrian and Bicycle Access. The NOP mentions “pedestrian and bicycle circulation” but the SP map shows only roads for vehicles. Plans for connecting residential and commercial areas with parks via sidewalks and bike trails need to be detailed.
- Agricultural Protection. It is important to protect existing agricultural uses by accommodating the existing easement and long standing practice of moving cattle between adjacent parcels for grazing. Explain how open space will be configured and fencing provided to allow this practice to continue.
- SP Implementation. In order to properly evaluate impacts it is important to explain in the DEIR how the SP will be implemented, i.e. in phases (or not), and how and when the necessary water, sewer, and emergency service related actions will be agreed upon with involved providers. Prior to implementation, a public facility financing plan (a requirement for any specific plan) should demonstrate that there will be sufficient and timely funds to cover the costs of the necessary infrastructure.

Providing the above information will make it possible for local agencies and the public to suggest other feasible alternatives that might meet County needs better. We encourage the County to provide this information in the DEIR and consider holding a public workshop to consider feasible SP alternatives for analysis in the DEIR in keeping with the County’s intent to sponsor an open, inclusive, and meaningful public planning process. Providing an equal level of analysis for a reasonable range of alternatives will give the Board of Supervisors the flexibility to choose the best alternative (or a combination of components from different alternatives) when it comes time to adopt the final SP for the Wicklow Way property.

II. Alternatives

Foothill Conservancy has identified a preliminary alternative for analysis in the DEIR (see attached map). Our alternative proposes about 49 acres dedicated to residential use to be developed in phases with a mix of about 500 units of moderate and high-density housing.¹ Housing is concentrated near existing infrastructure and allows for a mix of housing types: single-family, duplexes, townhouses, apartments, and a possible senior congregate care facility or similar special housing use. Clustering homes within the designated areas would create an intimate sense of neighborhood and ample open area for development of community gardens, bike paths, playgrounds, dog parks, picnic facilities, etc. A civic complex is shown in the same place as in the proposed SP and we include an arts center here, too. The alternative also indicates locations for a fire station and school (if needed). Parks are spaced throughout the area, and the open space would be protected by conservation easements which could allow some continued agricultural uses. We preserve the open space strip along the eastern edge of the plan area to facilitate movement of cattle to grazing pasture along the southern edge of the site (a road crossing would have to be designed). This alternative proposes 16 acres of commercial uses—33% more than the county’s alternative. This would include not only community serving retail adjacent to existing shopping centers, but also could accommodate office or apartment uses above retail and some professional office development (e.g. a dental practice). Such commercial development has the potential to serve community needs and generate more tax revenues for local government. Our alternative includes an 18-acre area labelled Mixed Use west of the civic complex (it assumes upgrade of existing wastewater treatment facilities vs construction of a new

¹ The county’s RM (medium density) land use designation permits a wide range of units, 9-25 units per acre. On 49 acres, this could yield anywhere in the range of 441 to over 1200 homes. We propose 500 as a suitable number to address workforce housing needs while reducing potentially significant environmental impacts.

wastewater treatment plant, freeing land behind Walmart for other purposes). Our vision for this area is to create good jobs to train and retain Amador residents and our youth. This could include light manufacturing, for example. If the civic complex cannot accommodate an arts center, it could be built in this area, close enough to make joint use of surface parking. Or it could accommodate businesses that support our agricultural sector, such as an olive press, harvest equipment rental, or a facility that showcases Amador products (wine and olive oil tasting, farm-to-fork café, local arts and crafts).

Implementation of this alternative features collaboration among the local governments, service providers, and nonprofit groups. Implementation would be phased to ensure services are available for the amount of development each phase requires, to achieve desired outcomes and timely impact mitigation. The County would participate in state and/or federal programs for funding low and very low income housing, and work with an established nonprofit experienced in the production and management of moderate and high-density affordable housing. Development phasing can be determined once the impact analysis, coordination with service providers, and mitigation commitments are completed but before the Final EIR is adopted.

III. Potentially Significant Project Impacts and Cumulative Impacts

The NOP notes that the SP may have significant impacts on transportation, biological resources, construction-related air quality and greenhouse gas emissions, historic and archaeological resources, noise, aesthetics and wildfire. We agree and believe the SP may have additional significant impacts on hydrology and water quality, air quality, energy consumption, greenhouse gas emissions, utilities and services, and emergency response services. If the cattle moving easement/practice is not preserved, this could impact the viability of the neighboring ranch, and therefore have significant impacts on the premature conversion agricultural land. CEQA requires that a specific plan be consistent with an adopted General Plan.

It will be important to address potential cumulative impacts—especially, traffic impacts on Highway 88 and in the vicinity of the existing high school, as the school district will be adding approximately 600 students to this school through its school consolidation plan. We support including mitigation measures to avoid or reduce potentially significant impacts. The NOP indicates the SP will include components not historically provided in private developments in Amador County. FC applauds this progress and agrees that the Wicklow Way property offers a prime opportunity to include project components called for in the 2016 General Plan and the new Housing Element (see the attachment identifying such components). We look forward to learning how these policies will be implemented in the area as drafting of the Specific Plan alternatives progresses. We welcome any opportunity to work with your staff and consultants in fine-tuning alternatives and identifying potential mitigation measures to achieve development of the Wicklow Way area in a way that reduces significant impacts and succeeds in benefitting the community in as many ways as possible.

Sincerely,

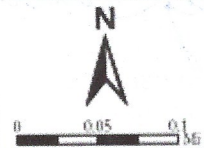


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cc – ACTC, ARSA, City of Jackson, ACUSD, Amador Arts Council, McKittrick



Proposed Wicklow Way Specific Plan Alternative



Coordinate System: NAD 1983 2011 StatePlane California II FIPS 0402

Attachment 1: Implementing the County General Plan and the new Housing Element through the Wicklow Way Specific Plan

The NOP for the Wicklow Way Specific Plan states “The vision for the Wicklow Way Specific Plan (WWSP) is to create a new community that meets or exceeds the County’s development standards through amenities and services and distinguishes itself through an efficient design and development pattern.” It further states that “The buildout of the plan area is expected to be a 20-year timeframe.” Below are policies from the 2016 General Plan and the new Housing Element intended to set new community development standards. More detail regarding the implementation of these policies can be found in the Housing Element and the Amador County Implementation Plan. The Wicklow Way Specific Plan presents a unique opportunity to implement these adopted policies. We encourage the county to consider these adopted policies when further defining and analyzing the Specific Plan. As environmental analysis progresses, please identify which of these policies will be incorporated and how they will be implemented, present this important information in the DEIR project description and in the analysis of potential land use impacts.

A) Land Use

Policy LU-1.3: Encourage development patterns which support water quality objectives; protect agricultural land and natural resources; promote community identities; minimize environmental impacts; enable viable transit, bicycle and pedestrian transportation; reduce greenhouse gas emissions; and promote public health and wellness.

As noted in the body of our scoping letter, we believe that improving ARSA’s wastewater treatment system to serve the Specific Plan Area will support water quality objectives. The Specific Plan should protect agricultural land by providing a functional easement for moving cattle (to honor an existing prescriptive easement). The Specific Plan should include energy efficient structures and residential solar energy generation to reduce greenhouse gas emissions. The NOP indicates that the Specific Plan will provide open space and include opportunities for pedestrian transportation. We strongly support these community amenities and look forward to learning more about them as drafting of the Specific Plan continues.

B) Infrastructure and Services

The General Plan includes a number of policies related to infrastructure and services:

Policy LU-2.1: Direct development to areas with existing urban services and infrastructure, or to areas where extending of urban services is feasible given distance from developed areas and topography, capacity, or land capability.

Policy LU-3.1: Ensure that effective public safety facilities, staffing, and equipment are provided to maintain service levels as the county’s population and development change.

Policy LU-4.2: Consider infrastructure availability and expansion in the evaluation of individual projects.

Policy LU-6.1: Ensure that new development is able to meet water supply, wastewater disposal, and public service standards.

Policy C-1.2: Guide future development to areas of the county where adequate water supplies can be ensured.

Policy C-3.1: Guide future development to areas of the county with the ability to obtain adequate wastewater service and treatment capacity.

Policy LU-12.1: Ensure that appropriate levels of emergency services, including fire protection, can be demonstrated for new development.

As noted in our scoping letter, we believe that collaboration with existing infrastructure and service providers for potable water, wastewater treatment, roads, and emergency services is the best way to implement these general plan policies through the Specific Plan. In addition, phasing of the project

will be essential to ensure that infrastructure and service capacity is available when needed to serve development.

C) Circulation

Policy CM-1.1: The County's Level of Service (LOS) standard is LOS C for rural roadways, and LOS D for roadways in urban and developing areas. For Caltrans facilities, the LOS standard shall be that established by Caltrans.

Policy CM-1.2: Work with Caltrans and regional and local transportation agencies to address regional issues and opportunities related to growth, transportation financing and infrastructure, and other planning issues.

Policy CM-2.2: Identify key roads and intersections with historical or projected traffic congestion and/or safety problems and apply creative management measures to improve circulation.

We believe that collaboration with existing road infrastructure providers including ACTC and Caltrans is the best way to implement these general plan policies through the Specific Plan. In addition, phasing of the project will be essential to ensure that road capacity and safety improvements are completed in time to serve development.

D) Housing

The new Housing Element includes many policies that could be implemented through the Specific Plan.

Policy H-1.1: Encourage diversity in the type, density, size, affordability, and tenure of residential development available throughout the County and throughout each city.

Policy H-1.3: Encourage and support the development of housing for those with special housing needs, including seniors, persons with a disability, including developmental, single heads of household with children, large families, the workforce, and unhoused.

Policy H-1.5: Support the concept of "aging in place" by maintaining a range of housing that allows people to remain in their community as their housing needs change.

Policy H-3.3: Support development and maintenance of affordable senior rental and ownership housing and supportive services to facilitate maximum independence and the ability of seniors to remain in their homes and/or in the community.

Policy H-3.4: Support families and single heads of household with children by encouraging the development of larger rental and ownership housing units for families with children, and the provision of family support services such as childcare and after-school care.

Policy H-4.2: Participate in state and federal programs assisting in the production, improvement, maintenance, and preservation of decent, safe, and attractive housing affordable to lower- and moderate income households and those with special housing needs, including seniors, persons with a disability, including developmental, single heads of household with children, large families, the workforce, the at-risk and the unhoused. Work with nonprofit and for-profit developers to utilize those programs for which a developer must be the applicant.

Policy H-4.4: Advocate for sustainable use of land and promote affordability by encouraging development of two-family and multifamily housing within each jurisdiction's multi-family zoning districts.

Policy H-4.8: Ensure that extremely low, very low, low, and moderate income households have access to affordable units.

The Housing Element also includes a number of programs that could be implemented in the Specific Plan area. For example, Program 4: Accessory Dwelling Units, Program 9: Affordable and Special Needs Housing, Program 13: Affirmatively Further Fair Housing, Program 16: Federal Voucher Program, Program 19: Water and Wastewater Infrastructure Capacity, Program 20: Partnership with

Affordable Housing Developers, and Program 25: Energy Conservation Initiatives. These programs would help achieve affordable workforce housing goals.

E) Agriculture

Policy E-8 .1: Ensure future land uses are appropriately located and scaled to fit in with the county's rural and agricultural context.

Policy E-9.5: Review future development for compatibility with existing adjacent and nearby agricultural uses.

As noted in our letter, we believe that these policies can be supported by continuing to maintain a functional easement for moving cattle through the property and by preserving an agriculture/open space buffer between new development areas and existing agricultural uses.

F) Water Conservation

Policy C-1.4: Encourage new development, renovation, landscape, and agricultural projects to include water conservation measures, including use of graywater, reclaimed, or recycled water for irrigation, water-conserving plumbing fixtures, and low-water landscapes.

We know that treated water supplies are strained now and will continue to be in future. Reducing water consumption through the recommended measures would assist community residents and benefit the environment.

G) Stormwater Run-off

Policy C-4.1: Encourage site plan elements in proposed development such as reduced pavement/cover and permeable pavement, as well as drainage features which limit runoff and increase infiltration and groundwater recharge.

Policy C-5.2: Encourage the use of LID strategies to help Amador County sustain and improve both surface- and groundwater quality.

The Specific Plan area is sloped and drains into a creek. The NOP indicates that the Specific Plan "is intended to preserve and protect Rock Creek." We encourage the County to apply LID strategies in the Specific Plan area to reduce run-off and increase infiltration.

H) Energy Conservation

Policy C-9.4: Encourage energy conservation and energy efficient design in new development projects.

Policy C-10.5: Require new development projects to incorporate building placement and design features to increase energy efficiency in new structures

In addition to these general plan policies, the Amador County Energy Action Plan includes policies regarding energy conservation and renewable energy use in new construction. We hope to see energy conservation and energy efficient design features incorporated as drafting of the Specific Plan progresses.

I) Greenhouse Gas Reduction

Policy C-10.2: Develop and adopt a comprehensive strategy to reduce GHGs within Amador County by at least 15 percent from current levels by 2020. The Implementation Plan indicates that the County will evaluate the GHG emissions from development proposals.

We look forward to learning about the GHG reduction features that will be applied in the Specific Plan area as development of plan details progresses.

J) Fire Safety

The General Plan includes multiple policies relating to fire safety:

Policy LU-12.3: Continue to ensure that the County's development code addresses evacuation and emergency vehicle access, water supplies and fire flow, fuel modification for defensible space, and home addressing and signing.

Policy S-2.1: Consistent with state regulations and local code requirements, require new buildings to be constructed to provide fire-defensible spaces, separated from property lines and other buildings on the same or adjacent properties by adequate building setbacks clear

of brush and fuel. Require new buildings in areas of moderate to high fire risk to be constructed using building materials and designs that increase fire resistance.

Policy S-2.2: Guide new development to areas where adequate fire protection, roads, and water service are available to support fire response.

Policy S-2.3: Incorporate fire safety site planning techniques within new development applications in high- or very-high fire risk areas. Encourage building envelope or cluster development techniques to increase defensible areas.

Since fire safety has become a critical issue in foothill communities, we expect to see the above fires safety policies addressed in the Specific Plan.

K) Noise

Policy N-1.3: Evaluate potential noise conflicts for individual sites and projects, and require mitigation of all significant noise impacts (including construction and short-term noise impacts) as a condition of project approval.

The DEIR should identify a menu of noise impact mitigation measures that will be used to reduce noise impacts as the Specific Plan builds out.

Policy N-2.4: Encourage the use of alternative transportation modes such as walking, bicycling, and mass transit to minimize traffic noise.

The NOP states that the Specific Plan will include “new circulation linkages, and connections via a pedestrian and bicycle network.” Pedestrian and bicycle paths will not only improve aesthetics and community livability, but will also help reduce traffic noise in the long term.