

## DEPARTMENT OF TRANSPORTATION

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February 11, 2013

032013-PLA-0009  
03-PLA-Var  
SCH #2013012037

Ms. Maywan Krach  
County of Placer  
Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, CA 95603

**Placer County Targeted General Plan Amendment – Proposed Negative Declaration (PND)**

Dear Ms. Krach:

Thank you for including the California Department of Transportation (Caltrans) in the application review process for the project referenced above. The project proposes a limited number of targeted amendments to the 1994 Placer County General Plan. This project encompasses all of Placer County. The following comments are based on the PND.

*Traffic and Circulation*

*Section 3: Traffic and Circulation, subsection 3.A15*, indicates that Placer County will recommend that a ramp-metering program for the Interstate 80 corridor between Auburn and the Sacramento County line be included in the next Regional Transportation Plan (RTP). Caltrans would like to see State Route 65 added to this section as well to mitigate traffic impacts from projects in the City of Roseville.

Please provide our office with copies of any further actions regarding this project. We would appreciate the opportunity to review and comment on any changes related to this development.

For any questions regarding this letter, please contact Josh Pulverman, Intergovernmental Review Coordinator for Placer County, at 530-634-7612 or by email at: [josh\\_pulverman@dot.ca.gov](mailto:josh_pulverman@dot.ca.gov)

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Arnold".

GARY ARNOLD, Chief  
Office of Transportation Planning – North

*"Caltrans improves mobility across California"*

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**ATTACHMENT 6**

**CENTRAL VALLEY FLOOD PROTECTION BOARD**

3310 El Camino Ave., Rm. 151  
SACRAMENTO, CA 95821  
(916) 574-0609 FAX: (916) 574-0682  
PERMITS: (916) 574-2380 FAX: (916) 574-0682

**RECEIVED**

MAR 07 2013



February 28, 2013

ENVIRONMENTAL COORDINATION SERVICES

Ms. Maywan Krach, Environmental Technician  
Placer County Community Development Resource Agency  
3091 County Center Drive, Suite 190  
Auburn, California 95603

Subject: Notice of Completion and Environmental Document Transmittal:  
Placer County Targeted General Plan Amendment (GPA)

Dear Ms. Krach:

The Central Valley Flood Protection Board (CVFPB) has reviewed the documentation supplied from Placer County for the proposed Placer County Targeted GPA and for the plan's compliance with Assembly Bill 162 (AB 162). Upon completion of review, the CVFPB has the following flood hazard concerns:

- CVFPB staff found Placer County lies within the 100-year, 200-year and 500-year floodplains, and within a small Levee Flood Protection Zone for this area of California (please see Attachment A). It is because of the flood hazard risk for this area that the CVFPB suggests the County consider following current State flood management policy noted in Government Code Sections 65865.5, 65962 and 66474.5 which discourages residential development within floodplains unless there is an adequate flood protective system present.
- The road embankments of Interstate 80 and State Highway 65 may act as barriers to a flood evacuation, as well as impede flood waters. In a flooding event, emergency services could be isolated from certain areas of Placer County due to these roadway barriers and their retained flood waters. It will be important for the County to address these issues in the Targeted GPA.
- The CVFPB suggests that land uses other than residential may be more suited for development within floodplains considering the potential flood hazard risks for Placer County.

CVFPB staff also found the County's housing element was adopted by the County prior to January 1, 2009, which is the housing element update compliance trigger date in AB 162, and has also been codified in California Code Sections 65302.7 and 65352. Therefore, CVFPB looks forward to reviewing the safety element of the County's Targeted GPA to ensure flood hazard related matters are in compliance with these sections of the Code.

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Ms. Maywan Krach  
February 28, 2013  
Page 2

To summarize, AB 162 requires cities and counties in the Central Valley to amend the land use, conservation, safety, and housing elements of their general plans to address flood-related matters. In addition to cities and counties providing adequate flood management in their planning, these legislative requirements also make flood risks more apparent to the public when deciding whether to live in a floodplain and face preparedness for flooding, purchase of flood insurance, and other associated consequences.

The California Department of Water Resources (DWR), in October 2010, prepared the "Implementing State Flood Risk Management Legislation into Local Land Use Planning, A Handbook for Local Communities." The CVFPB suggests the County follow this handbook for evaluating the flood hazard risks of future development proposals. This handbook is available at the following DWR internet address:

[http://www.water.ca.gov/floodmgmt/lrafrmo/fmb/docs/Oct2010\\_DWR\\_Handbook\\_web.pdf](http://www.water.ca.gov/floodmgmt/lrafrmo/fmb/docs/Oct2010_DWR_Handbook_web.pdf)

A general plan checklist is attached (Appendix C from the Handbook) to assist you in preparing the required information and to use when submitting future general plan documents to the CVFPB for review. Please provide this checklist to the staff or consultants who prepare general plan updates for your jurisdiction. The checklist outlines what is required by the law, however, CVFPB staff may ask for more information in addition to this checklist.

If you have any further questions, please contact Mr. Michael C. Wright, Chief of the Enforcement Section, at (916) 574-0698, or by e-mail at [mcwright@water.ca.gov](mailto:mcwright@water.ca.gov).

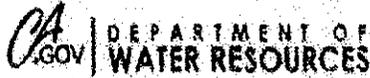
Sincerely,



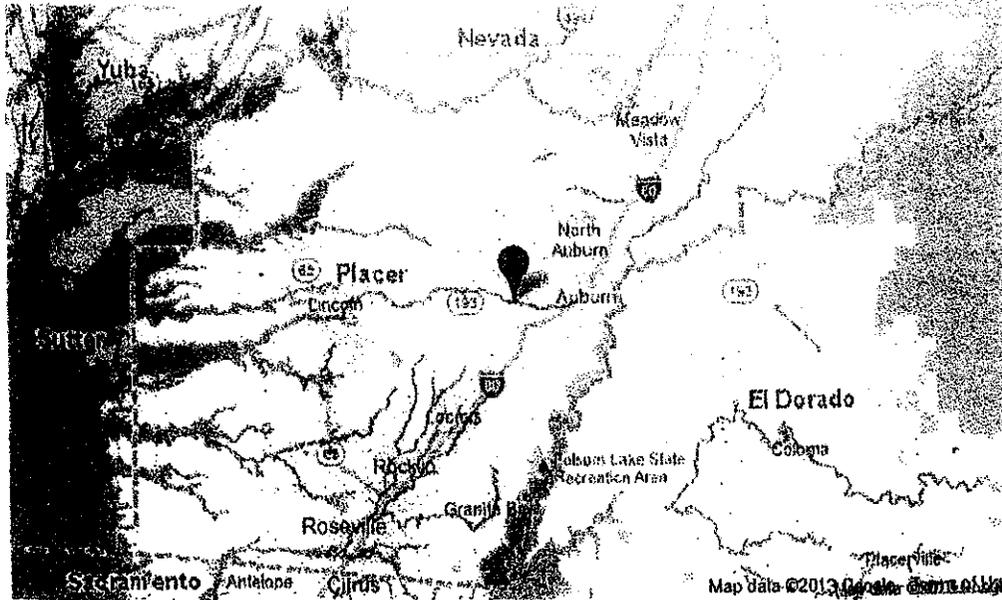
Jay S. Punia  
Executive Officer

Attachments: A – 100, 200, & 500 year floodplain and levee protection zone maps  
Appendix C, General Plan Safety Element – Review Crosswalk (11 pages)

cc: CVFPB Board Members  
Jon Tice, CVFPB  
James Herota, CVFPB



### Floodplain Information



Floodplains are displayed using semi transparent colors. When viewing overlapping floodplains, the combination of multiple semi transparent colors will not match the legend colors. For accurate color representation, view floodplains individually.

**Legend:**

County Boundary

**100-Year Floodplains**

FEMA Effective

**200-Year Floodplains**

USACE Comprehensive Study

**500-Year Floodplains**

FEMA Effective

**Disclaimer:**

The BAM does not replace existing FEMA regulatory floodplains shown on Flood Insurance Rate Maps (FIRM). For more information on the FEMA regulatory floodplains, please contact FEMA directly. The BAM floodplains identify potential flood risks that may warrant further studies or analyses for land use decision making. The floodplains shown delineate areas with potential exposure to flooding for three different storm events: one with storm flows that have a 1% chance of being equaled or exceeded in any year (100-year), one with storm flows that have a 0.5% chance of being equaled or exceeded in any year (200-year), and one with storm flows that have a 0.2% chance of being equaled or exceeded in any year (500-year). These flows and resulting flooded area are based on the best available floodplain information and may not identify all areas subject to flooding. The floodplain map is best viewed and printed in color

Attachment A

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PLACER GROUP  
P.O. BOX 7167, AUBURN, CA 95604

March 1, 2013

Attn: Chris Schmidt  
Placer County CDRA  
3091 County Center Dr, Ste 180  
Auburn, CA 95603

Subject: Targeted General Plan Update Amendment (PGPA 20120356)

The work involved in the updates and amendments of the Targeted General Plan Update Amendment (TGPUA) is commendable, and many changes are appreciated. However, some aspects of the TGPUA are disconcerting.

If approved as drafted, some of the revisions in this TGPUA will have, or will have the potential to have, very significant environmental impacts, and therefore would require the preparation of an Environmental Impact Report (EIR) to comply with the California Environmental Quality Act (CEQA). Where some of the new policies are presented, the Mitigated Negative Declaration (MND) is completely inadequate in informing the public of the potential significant impacts.

One option would be to edit the TGPUA to more clearly reflect the stated intent of the amendments (corrections, updating, etc.), and delete any new policies that may be too broadly interpreted and/or may have significant environmental impacts. If the word "mostly" could be changed to "solely" in the stated intent, and amendments be restricted only to those with no significant potential environmental impacts, that would be satisfy concerns.

Some edits may have already been made, but in the final draft or actual TGPUA policy document, please consider these changes and concerns to justify edits, or consider the preparation of an EIR to explain and inform the public of the impacts:

1—Land Use. The Agriculture 160 acre minimum and the Timberland 640 acre minimum should be left in the General Plan. This may be very important with future zoning, and those acre sizes could influence conservation easement decisions. By deleting those two minimums acreage size potential throughout the TGPUA, there is a subtle impression that ag and timberland can function at smaller minimums. Because (1) such a position is debatable; (2) reduced parcel sizes in these two zones may be detrimental to productivity; and (3) lot-splitting may be encouraged, we urge that both acreage minimum parcel sizes remain in the TGPUA as possibilities for current or future zoning ordinance decisions. The 160- and 640-respective acre minimums should be kept in both the discussions and tables in the TGPUA.

2—Forestry minimum parcel sizes of 20 acres may indeed help "maintain a strong rural identity in the area." [bold added] However, the impression presented is that 20 acre minimum parcel sizes are viable for timber operations. There may be viable timber operations on 20-acre parcels in Placer County, but this statement more appropriately belongs in some other section (beginning of "Land Use" perhaps) so as to not mischaracterize 20 acres as being a minimum for a viable timber operation.

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3—The Table on page 37, “Functional Classifications by Geographic Area” mentions Placer Parkway as an “Expressway” to Sutter County with “Expressway” defined as having “very limited” access. We urge the County to set the geographic point where the “limited access” will terminate on Placer Parkway and “no access” begins.

Approvals of Placer Parkway have always come with the understanding that there would be limited access in the most easterly portion of the Parkway, but prohibited further west in the County. As currently listed in the Table, this might be construed as allowing more interchange access in western Placer County and still claim that it is “limited.” Possibly “Expressway” conveys the correct intent, but if it allows for a misinterpretation and more access interchanges, then it should be further qualified to specify access restrictions.

Page 93—Goal C—Tahoe Basin Housing

We urge the County to not make any amendments regarding Tahoe Basin housing until the Tahoe Regional Planning Agency (TRPA) litigation issues are resolved.

Page 98—Program F-1 GROUP HOMES. Traffic impacts from multiple family/friend visitations, trips to doctor appointments, excursions, health/safety inspections, etc., may be significant on any neighborhood street where the units can have six group-home residents. However, increasing the allowable number of group home residents to eight has the potential to create additional significant impacts that must be analyzed. Parking must be addressed; the number of such GROUP homes in any one area, on any one residential street, etc., must all be analyzed for cumulative and/or neighborhood “saturation” impacts.

Page 102—Program H-3 GREEN BUILDING INCENTIVE PROGRAM. Since other policies in this TGPUA use “shall...to the extent possible,” or “shall...to the extent practical,” we urge using such phrasing conditions and changes to the wording in this sentence: “*Based on the rating, the County shall award incentives to developers of green residential buildings, including, but not limited to:*” Please consider changing that sentence to read: “*Based on the rating, to the extent feasible, the County shall award incentives....*” Among the incentives listed, *fee waivers, density bonuses; and reduced parking requirements* should not be automatically awarded in any instance or green rating score. Without stipulations, these three mandated (“shall award”) incentives have the potential to create significant traffic impacts, noise increases, and drains on County financial resources.

The County should also provide incentives for smaller square footage (foot print) “green” homes—less than 1,500 sq ft, for example, which are designed so that spaces may be multi-used, thus allowing for a smaller footprint and energy use. Regardless of its operational energy efficiency rating, a large home (e.g., >2,500 square feet) has already used up excessive resources just in construction materials. Adding “green” features is admirable, but it’s somewhat of an after-the-fact gesture that merely offsets the excessive resources that are used to construct such larger residences. Granting incentives to developers of such large homes is questionable. It might be more reasonable to incorporate a penalty (disincentive) into larger residential single family residences that would be factored in to the point system.

Page 108—3.A7. This sentence must either be deleted or an EIR must be prepared to analyze impacts and inform the public of the impacts. First, what is meant by “*Temporary slippage*”? One week? One month? One decade? Reliance on this word is unacceptable and may create long-range, cumulative and/or significant impacts—traffic, air quality, noise, slippage to LOS F, etc. The vagueness here is unacceptable and will create interpretation problems.

Second, “...until adequate funding has been collected for the construction of programmed improvements” is a recipe for deferral disaster and may result in significant traffic impacts, due in part to cumulative effects over the indefinite time period and open-endedness of the word “temporary.” Its potential for permanency—an impact in perpetuity with no analysis, mitigation, or public noticing/informing—and real risks of never having the nebulous funds designated or collected, make this an unacceptable and unreasonable policy to adopt unless it is thoroughly vetted via an EIR.

Last, with the increased number of developers whose projects have either not been built out, let alone not been built at all, or risk bankruptcy potential, the County cannot/should not gamble that the LOS improvements will come later, as in a “trust me” mode. If/when the improvements do not materialize, taxpayers will bear the cost burdens to reverse the lowered LOS. The bankruptcy proceedings of the Bickford Ranch project appear to have cost the County a loss of both its Clark Tunnel Road right-of-way plus amounts owed to the County (fees not collected up front). The County should not extend credit nor defer any future programmed improvements which, until fulfilled, will impact citizens—that is the role of lending institutions.

The word “temporary” must be replaced with a definitive time span, and up-front funding options mandated, such as, “Adequate funding shall be provided via deposits in a trust account with sufficient funds to remedy the LOS slippage,” and/or “a bond shall be posted to cover programmed improvements or LOS slippage.”

Section 6—Natural Resources. Wherever “California Department of Fish and Game” is referenced, the name should be changed to “California Department of Fish and Wildlife” or CDFW. The same name change may also be warranted with the California “Department of Forestry” to “CalFire.”

For the final TGP UA, and future policy documents over 2 MB, we urge the County to consider dividing the sections into smaller electronic documents.

Thank you for considering our views,



Marilyn Jasper, Chair

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-†- PUBLIC INTEREST COALITION -†-

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March 1, 2013

Attn: Chris Schmidt  
Placer County CDRA  
3091 County Center Dr, Ste 180  
Auburn, CA 95603

RE: Proposed Changes—Targeted General Plan Update Amendment (PGPA 20120356)

We appreciate the stated intent of the Targeted General Plan Update Amendment (TGPUA) policy document to “target” a limited number of amendments to the 1994 General Plan, consisting mostly of edits [emphasis added], corrections, status updates, revised figures, etc. However, we believe a number of the actual amendments proposed in the TGPUA may extend far beyond the stated necessity to comply with new laws and requirements, corrections, etc., and in fact may create new directions or policies. Where this occurs, we believe that the Negative Declaration is inadequate and inappropriate, and that only the preparation of an Environmental Impact Report (EIR) will suffice.

Please consider incorporating the comments below by either editing or deleting issues of concern in the final policy document, or consider preparing an EIR where significant environmental impacts may occur.

New or changed policy issues of concern include the following:

Page 88—Policy B-14. *To preserve homeownership and promote neighborhood stability, the County shall attempt to alleviate individual and community issues associated with foreclosures.* The concern with this new/changed policy is with the potential impacts if such “attempts” include granting variances from zoning codes/ordinances, other land use permits, or waivers of fees or taxes—especially if such “attempts” might be used to comply with the open space or recreational mitigation. The County may indeed want to preserve home ownership and promote neighborhood stability, but this policy is too nebulous and, therefore, may be misused. Foreclosure activities are more market or economic driven concerns and not land use governance issues. Please consider deleting this policy

Page 88—Policy B-15. Please add “Farm” zone to this list and include it in the zones that shall include an affordable housing component if a proposal in that zone requires a General Plan (GP) or Community Plan (CP) land use amendment. To exclude Farm zones from the affordable housing requirement in a GP land use amendment to Residential or Specific Plan needs to be justified and explained.

Page 89—Program B-15 FEE WAIVERS. Waiver of 100% of the application processing fees is not sound economic policy and fraught with possibilities of having taxpayers cover costs that rightfully belong with the proposal or applicant. Unless the County is guaranteed a return (restitution of costs), either by posting a bond or by collecting fees up front, and/or holding them in trust until costs are recovered, this clause must not be a part of the TGPUA. Additionally, waiving any environmental staff time charges and/or service mitigation fees should be considered only after the project is completed and the units are operational. Incentives are not the issue, but “performance,” after the county has incurred all the expenses, is a huge issue, especially since “bankruptcy” is always an option. Incentives

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**PUBLIC INTEREST COALITION P.O. Box 671 LOOMIS, CA 95650**  
**Public-Interest@live.com 916-652-7005**

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may be allowed, but they should not become costs born by taxpayers with no guarantees of performance. Waiving fees on any project as an incentive is questionable, especially when safe, common business practices could be implemented that would cover potential County costs and risks.

Page 91—Program B-11 PRIORITY PROCESSING. On the surface, the reviews listed may have merit, especially with “*Greater public outreach and education*,” however, transparency must be a top consideration. If “on-line permitting” is allowed, then the “Public Noticing” should be increased, and such permits should be posted on the County’s website for review. Streamlining for public access to information should be equally important as process streamlining.

Page 91—SECOND UNITS. Amending the zoning ordinance to allow accessory apartments **by right** within all residential zones has potentially huge and significant impacts, regardless of the affordability of the housing. Following state law should not preclude all the other requirements and concerns that any residential neighborhood would have—parking, set backs, buffers, etc. If this **by right** amendment is enacted, then a stipulation should also be imposed that the conditions for the approval prohibit any future variances to the zoning codes or changes in the zoning at a later date, unless the senior or affordable housing development is terminated via prescribed processes.

The intent to maintain “adequate levels of public review” is admirable and desirable, but highly improbable. Too many changes in land use have occurred without public knowledge due to many factors—busy families, hearings only at a Zoning Administrative level; and/or “functional equivalency” determinations, which may circumvent transparency. The County must error on the side of caution with any **by right** amendments and consider the significant consequential impacts.

Page 98—Program B-12 SECOND UNITS. Any “by right” zoning allowance or amendment is fraught with potential problems—environmental impacts that will not be either exposed or addressed, neighborhood controversies, and little-to-no recourse for enforcement issues. How will the County monitor the “affordability” aspect of a granted-by-right second unit over a garage? Or any detached unit? Or the number of residents that may move into such units, when enforcement resources are reduced?

Following state law still allows the County to set parameters—parking, parcel buffers and setbacks, etc.—which should be conditions for approval and not a **by right** policy that may create potential impacts. For example, if every household in the Granite Bay, Loomis, Penryn, area or any other County rural residential zoned area, created “Second Units,” what would be the impacts on traffic? On water supplies? On the myriad of other potential environmental impacts? What is to prevent the “Second Unit” from being a multi-family unit? With two or three families?

The TGPUA’s use of the words, “accessory apartments,” contains an element of multi-family “Second Unit” interpretation. We urge the County to **delete the “by right”** language, require the usual permitting processes instead of streamlining which often is accompanied by a lack of transparency, and adhere to the current minimum parcel size restrictions, which should be in compliance with state law.

Page 92—Program B-13 LAND BANKING. We urge the County to always require bonding to cover any/all County costs attributable to making appropriate sites “*available to developers at a reduced cost in exchange for the provision of affordable housing units.*” The risk of non performance, subsequent costs of restitution, or legal issues, must be covered in full before any offers of reduced costs sites are made.

Page 94—Program C-3 LEGISLATIVE PLATFORM. We urge the County to not engage in lobbying activities on behalf of Placer County citizens; we elect state legislators for that governance. County views on legislative issues may or may not be in agreement with citizens. That determination should be via a County wide vote.

In addition to possible widely differing opinions on legislative issues, the insertion of this highly charged political platform statement is totally inappropriate, not only for a County position, but also for insertion in a Negative Declaration:

*Exempt affordable housing from the State prevailing wage law.*

In an area where “affordable housing” is needed, to consider a policy that exempts those very people who may need that housing from earning prevailing wages effectively contributes to keeping those citizens at, or below, poverty levels. For a government agency to take such a short-sighted position is inexcusable. Please delete this platform statement.

Page 94—Program C-4 NEW MECHANISMS FOR WORKFORCE HOUSING. To condone illegal secondary dwelling units by granting an amnesty period not only reinforces a disrespect for the law but also perpetuates and encourages the already-rampant and ever-growing culture of non-compliance in Placer County. Regardless of other non-code enforcement issues in the County, to set such a blatant obstruction of justice in a General Plan policy document that may reward those who refuse to follow laws of the land is beyond the pale. This Program must be stricken from the TGPUA entirely and replaced with a firm commitment to uphold zoning ordinances and building codes.

Page 94—Program C-6 DOWN-PAYMENT ASSISTANCE PILOT PROGRAM. Although we appreciate efforts to help employers establish a down payment assistance programs via deferred mortgages, we submit that it is unwarranted and inappropriate for the County to be involved in such activities. It may be a pilot program, but it’s an arrangement between private parties and should not involve any assistance from the County. If the employer wishes to compensate the County for advice, that is a different issue, but the County should not be a part of private mortgage arrangements, and/or any speculation potential that brings potential for liability and vulnerability with such participation.

If the County is indeed making rehabilitation loans, then it should share in any later home value increases or market appreciation gains in proportion to the risk taken.

Page 95—Policy D-8—If dwellings do not meet current zoning standards, then they should not be allowed any immunity from compliance. Threats to public health and/or safety (e.g., electrical fires due to faulty or substandard wiring) are the obvious reasons for disallowance, but all neighbors and communities may suffer when standards are not upheld. Worse, with precedent set, others may wish to be granted similar zoning non-compliance immunity. This type of policy has the potential to create huge contentious, discriminatory issues among neighbors and within communities. It should be stricken from the TGPUA.

Page 97—Policy E-2: Our first concern is that affordable housing deed restrictions should not be allowed to be converted to market rate housing without overwhelming changes in the activities and character of the community. A two-year notice to accommodate what may be an arbitrary decision to convert is not a reasonable approach to long-range zoning planning. Just as the Williamson Act requires ten years to bow out without penalty, conversion of affordable housing deed restrictions must require a much longer noticing process and consideration of a penalty clause. Just as the “Density Bonus Ordinance” may require a 30-year commitment, so should a similar requirement be made before any affordable housing deed conversion would be considered.

However, assuming a two-year notice prior to the conversion of any deed-restricted affordable units to market rate (within the listed circumstances) is approved, we urge adoption of the following stipulations:

To the extent that any County fees or costs were waived or went uncollected for the affordable units when they were created, and to the extent that the project was subsidized by the County or other public agency, with any public funds or resources, the County shall share in any appreciation of property values, and receive those cost/fee/subsidy amounts in full payment with market rate interest applied, as well as restitution for "tracking costs" for the entire time the project was in operation—either at the sale of the property and/or via retroactive property taxes that may have been suppressed due to the nature of the project.

The fee waivers, incentives, subsidies, tracking, technical and financial assistance costs should not be born by taxpayers especially if/when a project is converted, deed restrictions removed, and increased market values favor the owners of the property(ies).

Page 97—Program E-3 PRESERVATION OF AT-RISK PROPERTIES. In addition to the stipulations suggested above, to preserve at-risk affordable properties, please consider adding an enforceable condition before any conversion request may be granted, such as: The designated property must be offered to other investors at deed-restricted values who will in turn guarantee that the property will remain in affordable housing units for a minimum of 15 years or longer time period. If at the end of that time, a conversion is requested, then the same conversion and stipulation processes must be followed. Should no investors or buyers step forward, then the stipulations suggested in Policy E-2 should be implemented to provide full restitution to the County and sharing in the market appreciation values.

Page 98—F. Special Needs.

Page 98—Program F-1 GROUP HOMES. This amendment has the potential to not only have significant traffic impacts on residential neighborhoods, but also to have equally disturbing potential for human health and safety impacts. We urge deletion of "...increasing the by-right occupancy" clause and maintaining the maximum number of residents at "six or fewer."

Just as granting variances can have detrimental impacts on neighbors, so can any "by right" clause, especially with proposals that can severely impact neighbors and are modified in later years but retain the "by right" entitlement. As we've seen with other such broad policies, "by right" clauses bring controversy to neighbors due to unintended interpretations of ordinances.

To have six residents in any kind of health care, behavior modification, or senior convalescent care residential household is a huge undertaking. Turnover in staff is high; patients, especially the elderly, can be neglected. Possibly falling short of "elder abuse," the incidents of senior care home violations is borderline rampant, if not already so, and Placer County has had its share of incidents. Yet, public agencies that govern and inspect these facilities claim they do not have the resources to monitor such homes on a regular basis—monthly or bi-monthly.

Increasing the number of residents in group homes to "eight or fewer," from the current six or fewer, is unacceptable, unreasonable, and will create life-threatening conditions for seniors or others who have self-care/advocacy challenges. Increasing the by-right occupancy to eight may result in a lack of oversight or proper care of residents; lack of parking for visitors; neighborhood traffic impacts with family and professional visitors; inability to remove convalescent patients in event of emergency (fire, flood, etc.). Elder and patient abuse is more difficult to monitor when tucked away in a private residence in a quiet

neighborhood than it is in a larger "rest home" facility that employs larger numbers of round-the-clock professionals to care and/or watch over residents. When the one staff person on duty needs to leave the residential facility, incidents of "restraining" helpless patients to chairs or beds has occurred. Without County resources to properly monitor and regularly inspect, existing problems may continue with dire consequences.

If physical necessities and conveniences (lever door handles, adjustable showerheads, counter heights, etc.) are important enough for the County to adopt in the TGPUA, then it is equally important to consider adopting codes that will prevent abuse and neglect of those who must reside in Group Homes for a multitude of reasons and reduce their health and safety vulnerabilities. Other physical necessities to consider with group home facility design features (Policy F-2) include requiring exterior doors on rooms (most group homes have at least two residents per bedroom) for emergency entrances and exits, a minimum of one bathroom facility per two residents, adequate kitchen/food storage requirements, ceiling sprinklers for fire suppression, and a myriad of other safety precautions with regular inspections to ensure compliance.

The maximum number of any residents in GROUP housing developments and residential care facilities must be "six or fewer" for both environmental and health and safety issues.

Page 104—Program J-2 INTER-DEPARTMENTAL COORDINATION. In order to ensure that "funding is judiciously managed," please add to the last sentence in the paragraph these words "...and a minimum of an annual audit by an independent outside CPA."

Page 131—Implementation Programs. This implementation mandate is too broad and may be erroneously applied to non-Placer County-grown products without proper monitoring: "*The County shall* [bold added] *assist in the development of a Placer County-grown agricultural product marketing program*" The addition of this statement creates a potential unfunded or underfunded mandate and should be either deleted or reworded. More appropriate wording would be, "*The County may assist....*"

Without funding and without additional monitoring resources to ensure a County-assisted product marketing program is encompassing commodities actually grown in Placer County, this implementation is subject to misuse (again, at taxpayer expense) and compromises such a program to the detriment of genuine Placer Grown commodities. We urge the County to delete this section until all details can be established as to (1) where and how funding will be generated, and (2) what extent the program will fund marketing of only commodities with Placer County ingredients or elements (e.g., if a product contains less than 30% or 50% Placer County-grown ingredients, does it qualify for County assistance in a marketing program? Or will the program assist only commodities that are 100% from Placer County? How will such conditions be monitored for compliance?).

Last, we urge the County to post any type of documents for public review "digestible byte-sized pieces." The policy document is approximately 10 MB which for many home computers is impossible to download or save, especially in areas where dial up is used. It would have been much more reasonable to have broken it up into 1-2 MB sections. For the final staff report, we urge and would appreciate much smaller electronic bite-sized bytes.

Thank you for considering our views,

*Marilyn Jasper*

Marilyn Jasper, Chair