



Home Builders Association
of Tulare/Kings Counties, Inc.

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May 26, 2010

David Bryant, Special Projects Manager
TCRMA - Government Plaza
5961 S. Mooney Blvd.
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Dear David:


The attached memorandum from DPFPG is the HBA's official comment(s) on the 2030 Tulare County General Plan Update.

Our areas of concern are Housing Assumptions, Fire Protection and Four Other policy issues.

After reviewing our comments we would appreciate the county comply with the HBA's recommendations and source document requests.

If you have any questions or require additional comments or information, please contact me.

Thank you.


Robert J. Keenan
President/CEO

MEMORANDUM

Date: 5/24/2010
To: Bob Keenan
From: Development Planning & Financing Group, Inc. ("DPFG")
Re: 2030 Update Tulare County General Plan (Draft)

At the request of the Home Builders Association of Tulare/Kings Counties, Inc. ("HBA"), DPGF performed a review of the Tulare County ("County") General Plan Draft dated February 2010 ("General Plan"), the County Draft Housing Element 2009 Update dated March 23, 2010 ("Housing Element") and the County Public Facilities Impact Fee Study dated October 21, 2008 ("PFIF"). Our comments are provided below. Comments have been categorized into the following categories (i) Housing Assumption, (ii) Fire Protection, and (iii) Other Policy Issues.

Housing Assumptions:

As indicated in the General Plan a new Housing Element was formally adopted by the Board of Supervisors on March 23, 2010. DPGF collected the Housing Element from the County and performed a comparative review of the Housing Element housing assumptions as compared to the housing assumptions contained in the PFIF.

Our findings indicate the housing assumptions used in the Housing Element are not consistent/comparable to the housing assumptions used in the PFIF. These inconsistencies are as follows:

1. Housing Element annual growth projections reflect an accelerated absorption over PFIF annual growth projections by approximately 61% with an estimate of 938 units per year as compared to 573 units per year.
2. Existing housing unit assumptions in the Housing Element reflect housing units in 2009 figures, whereas the PFIF existing housing units are expressed in 2008 figures.
3. The Housing Element assumptions are based on a County planning cycle from January 1, 2007 to June 30, 2014 ("Planning Cycle") with total estimated units at the end of the Planning Cycle or June 30, 2014 of 51,908. Whereas the PFIF housing assumptions are based on 2030 buildout projections with total estimated housing units at buildout of 57,900.
4. Data as sourced from Construction Monitor indicates that the average annual absorption in the unincorporated County from 2000 to 2009 is approximately 530 units per year. Based on this resource absorption projections outlined in the Housing Element appear to be overstated. Verification of the growth patterns and growth rates in the unincorporated County should be verified.

It is recommended that the housing assumptions are adjusted for consistency between the Housing Element and the PFIF and that verification of the growth patterns and growth rates in the unincorporated County is conducted.



Fire Protection:

The PFIF currently utilizes the inventory approach to calculate the County fire fees. The current demand for fire services is based on a service population that includes residents and workers as well as the City of Exeter. The PFIF indicates that the County Fire Department plans to prepare a master facilities plan for fire facilities as well as a County needs assessment study for fire facilities.

Please provide copies of the master facilities plan for fire facilities as well as the County needs assessment study for fire facilities, or the status of the development of the respective facilities plan and needs assessment study.

Other Policy Issues:

1. Persons per household assumptions as identified in the General Plan state the "average household size" in 2006 is 3.27 persons per household. PFIF average persons per household assumptions are closer to approximately 2.90 persons per household, based on delineation between single family and multi-family land uses. Actual persons per household assumptions for single family and multi-family land uses have not been clearly defined in the General Plan. It is recommended that persons per household assumptions for single family and multi-family are clearly defined in the General Plan.
2. General Plan park acreage requirements reflect 5 acres per 1,000 population whereas existing park acreage as identified in the PFIF is 1.62 acres per 1,000 population. Additionally, new policies have been identified in the General Plan for additional park acreage above County guidelines for neighborhood and community parks which adjoin schools, which could reach in excess of 5 acres per 1,000 population. Additionally, implementation measures and indirect operation and maintenance costs associated with the additional park acreage requirements are not clearly defined in the General Plan. It is recommended that implementation measures and indirect operation and maintenance costs associated with the additional park acreage are clearly defined in the General Plan.
3. Infrastructure requirements strive to maintain existing service levels; however existing infrastructure service levels are not clearly defined. It is recommended that any General Plan service level recommendations are defined.
4. Impact mitigation requirements state that new development shall be required to pay its proportionate share of the costs of infrastructure improvements; however proportionate share is not clearly defined. It is recommended that new developments "proportionate share" of the cost of infrastructure improvements is clearly defined in the General Plan.

In summary, our recommendations and source document requests are as follows:

- 1) Housing assumptions – It is recommended that the housing assumptions are adjusted for consistency between the Housing Element and the PFIF and that verification of the growth patterns and growth rates in the unincorporated County is conducted.
- 2) Fire protection - Please provide copies of the master facilities plan for fire facilities as well as the County needs assessment study for fire facilities, or the status of the development of the respective facilities plan and needs assessment study, so that General Plan service level policy and corresponding infrastructure requirements may be evaluated.
- 3) Person per household assumptions - It is recommended that persons per household assumptions for single family and multi-family are clearly defined in the General Plan.
- 4) General Plan park acreage requirements - It is recommended that implementation measures and indirect operation and maintenance costs associated with the additional park acreage are clearly defined in the General Plan.
- 5) Infrastructure service levels - It is recommended that any General Plan service level recommendations are defined.

6) New development share of infrastructure costs – it is recommended that new developments “proportionate share” of the cost of infrastructure improvements is clearly defined in the General Plan.

Please contact me with any questions or to discuss the recommendations outlined above.

Sincerely,

Greg Angelo

Greg Angelo
Manager