

May 26 2010

Tulare County Resource Management Agency
Attn: David Bryant, Project Planner
Government Plaza
5961 South Mooney Boulevard
Visalia, CA 93277

To Whom it May Concern:

Re: Tulare County General Plan Update 2030 and Recirculated DEIR

The alternatives explored in the RDEIR, while giving a nod to many smart growth principles, all ignore fundamental policies and strategies that must be adopted in order for Tulare County to grow in a smart, sustainable manner.

None of the alternatives adequately address the concerns voiced by the people in the General Plan workshops. These concerns included air quality, water quality and availability, the preservation of agricultural lands, and the expansion of the economic base for the Central Valley.

While both the City Centered Alternative and the Confined Growth Alternative are marginally preferable to the proposed project, *all* of the proposed alternatives are subject to the ambiguous policies and weak implementation measures contained within the GPU, rendering the idea of alternatives moot. None of the alternatives will ensure efficient, sustainable growth and none adequately incorporate the suggestions of the healthy growth alternative suggested by TCCRG and supported by a number of other organizations and individuals.

The RDEIR states that, "the purpose of the alternatives analysis in an EIR is to describe a range of reasonable alternatives to the project..." While the RDEIR Alternatives Section includes, on its face, many good ideas and strategies, it fails in its stated purpose of providing a "range of reasonable alternatives." While several of the "*additional strategies that **could** be integrated into the policies and implementation measures of the Goals and Policies Report...*" - particularly those listed in the City Centered and Confined Growth alternatives - are wise and inclusive of smart-growth principles, the use of the word "could" renders these additional policies impotent. Furthermore, should the Board select an Alternative, the on-the-ground effect would be virtually meaningless as this alternative would be subject to the irresolute should, could, will-form-a-committee-to-discuss language of the both the previous and current versions of the GPU.

Like the DEIR Alternatives, the RDEIR Alternatives differ only slightly in their proposed population distributions. For example, regardless of which alternative is selected, 26-32% of the growth in the next 20 years will occur in Tulare County's unincorporated areas. Consequently, these alternatives propose nearly identical outcomes in terms of our future population distribution. No alternative is provided that would, for example, direct 90% or more of future growth to already urbanized areas, **require** resource-efficient development and **strictly** limit the circumstances under which development boundaries could be modified.

The County's reasons for selecting the proposed project are also lacking. It is suggested that the "environmentally superior" Confined Growth Alternative is dismissed because of its failure to "provide opportunities for small unincorporated communities to grow and improve quality of life and their economic viability." However, the difference in population distribution between the Confined Growth alternative and that of the proposed project is approximately 30,000 people. Given the fact that Tulare County has 20 communities and 11 hamlets, this diffusion of individuals to the rural and agricultural portions of our County is less likely to boost the economic prospects of our smaller communities and more likely to exacerbate the air pollution, water scarcity, and rapid loss of productive agricultural lands. Most of Tulare County's hamlets and many of her communities lack safe drinking water, proper wastewater treatment, and adequate infrastructure. Rather than directing our growing population to areas that have the resources, the capacity and the willingness to accept it, the GPU will simply contribute to the unplanned, inefficient sprawl that has made this County one of the most polluted areas in the nation.

The RDEIR must once-again be meaningfully revised to present a truly reasonable range of alternatives, including at least once alternative that **clearly** and **firmly** directs growth into those urbanized areas that have the desire and the capacity to accommodate that growth.

I urge the County to revise Alternative 5 (Confined Growth) to truly direct growth into our existing urbanized areas, protect agriculture and open space through efficient development, allows no leapfrog development of new towns and growth corridors, and provide only very limited circumstances under which urban development boundaries may be expanded. This loophole-free "Healthy Growth Alternative" should include clear, firm policies that support the following:

- Base the location, density, and amount of growth within urbanized areas on their desire and capacity to accommodate growth.
- Locate development (except that which is directly related to agriculture) within existing Development Boundaries, without loopholes or exceptions that allow for leapfrog new town or growth corridor development.
- Require (or incentivize) efficient development within or contiguous to existing urbanized areas.
- Make community and hamlet development boundaries meaningful, long-term planning boundaries by firmly limiting the circumstances under which they can be expanded.
- Discourage the premature conversion of agricultural lands to urban uses, and offset unavoidable impacts to agricultural lands and natural resource areas with mandatory mitigation measures such as conservation and agricultural easements.

Provide strong, clear policies with concrete, enforceable implementation measures that include definite timeframes, funding sources, and departments in charge of monitoring and enforcement.

Finally, I understand the dire financial situation that Tulare County is in, and I understand that these are tough economic times at every level from the individual tax

payer to the highest levels of government. Given these circumstances, however, I find it baffling and unconscionable that the County has wasted years and millions of dollars developing TWO General Plans that are essentially worthless in the face of clear direction by Tulare County residents, hundreds of pages of comments by concerned citizens and organizations, and clear directives from the Attorney General.

I ask that the GPU and RDEIR be further revised to provide clear, meaningful policies and implementation measures and truly “reasonable range” of Alternatives, including one inclusive of the smart growth principles suggested by TCCRG and their proposed Healthy Growth Alternative.

Thank you for the opportunity to comment.

Sincerely,

Sarah Campe
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