



HUMBOLDT ASSOCIATION OF REALTORS® INC.

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January 11, 2008

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Humboldt County Planning Commission
Community Development Services Dept.
Planning Division
3015 H Street
Eureka, California 95501

RECEIVED

JAN 14 2008

HUMBOLDT COUNTY
PLANNING DIVISION

Re: Humboldt County General Plan Update
Community Infrastructure and Services Element

Dear Commissioners:

The Humboldt Association of REALTORS® has reviewed this element and has concerns about the introduction of a policy regarding infrastructure and services standards. As the report states, “[A] major addition to the infrastructure and services policies is Policy IS-P1, ‘Adequate Public Infrastructure and Services Standards’. This policy adds a requirement to the [process] of discretionary development review to ensure that all necessary infrastructure and services are currently available at the time of project completion.” We ask that the County consider this language carefully because if it is implemented as written, it has the potential to stop development. We suggest the policy could be rewritten to allow for phased development of infrastructure which would allow development to continue.

Policy IS-P27 is also of concern. This policy proposes that permits for home construction should not be issued unless the owner can prove there is fire protection available. This has the potential to virtually stop development in rural areas located outside fire district coverage. We note that County planning staff stated at the December 19, 2007 Forest Review Committee (FRC) meeting that CDF does not intend to offer fire protection for residential structures. The CDF representative sitting on the FRC confirmed this. This effectively precludes rural home construction. The Association proposes that a waiver be created which would release the County from liability while the homeowner assumes responsibility for fire protection. This release would allow construction to proceed.

As stated in our letter regarding the Community Infrastructure and Services Technical Report, we ask why some topics are included in this Element, for

example; street lights, parks and recreation, schools, and public utilities? These were not included in the original scope of work when we reviewed the scope document in February, 2007. The inclusion of what appears to be added topics produces a distraction to more important infrastructure issues. Given this, we suggest no further time should be expended on these subjects.

In addition, although police, fire, stormwater, drainage (including the discussion on culverts) and flood control were listed in the scope of work, we advocate that no additional time should be spent on these either. At least not in the discussion about infrastructure. Perhaps they could be addressed in other elements such as the Safety Element or Open Space Element, as appropriate. We suggest fire and sheriff issues should not even be in the General Plan. They are jurisdictionally separate from the County, not under County control and are already addressed in separate Master Service Plans. We would also like to comment here that the fire districts should be receiving more Proposition 172 money. Presently they receive some 2% of the revenues. This percentage should be increased substantially given the importance of fire protection.

Generally we suggest that each topic should be organized in one place so that anyone would be able to read one element to find all they need to know on a subject, such as placing all fire related issues in the Safety Element, rather than having to look in multiple elements.

Our overall emphasis here is that what we consider the core infrastructures – water, sewer and roads – require the most attention. Given their poor condition, as described in the report, we strongly suggest that the County, from this point forward, focus its energies on these three components.

Implementation measure IS-IM5 states “[a]dopt an impact fee program”. The Association realizes impact fees and other exactions could be part of the future. This is a difficult situation because these costs are passed on to homebuyers who then must pay higher home prices. Consequently, the introduction of impact fees strikes the housing affordability issue hard. To minimize impact fees detrimental price effect, we encourage the County to pursue all other available sources of funding such as grants or low interest loans or other programs as listed in the Community Infrastructure and Services Technical Report to help defray the costs of infrastructure improvements.

There is also the problem of how small scale projects will be expected to pay the exactions being proposed. Typically, projects in this county are relatively small due to our small market size. Therefore economies of scale are not available to mitigate the high cost of infrastructure improvements. Exactions,

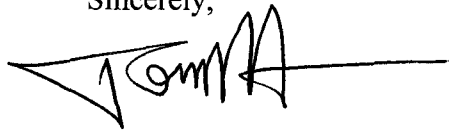
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passed on to buyers, become large percentages of home prices. There is also a timing issue. Residential build-outs and absorption rates are relatively slow in Humboldt County. This makes it difficult to secure bond money or other types of amortized financing because repayment revenue will be slow in coming.

There are many new proposals in this Element. Interpreting them to the benefit of the public is important. Where appropriate we suggest that Public Works and Environmental Health should be the lead agencies in implementation of the goals and policies of this Element.

We appreciate your consideration of our comments and look forward to continued participation in the General Plan update.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tom Hiller', with a long horizontal line extending to the right.

Tom Hiller
President

A handwritten signature in black ink, appearing to read 'Dave Varshock', with a stylized, cursive script.

Dave Varshock
Government Relations Chair

Enclosures

cc: H. C. Board of Supervisors
Kirk Girard, Director
John Miller, Planner
Neal Carnum, Winzler and Kelly

Plan Alternatives Comparison Chart

The "Vote" column is provided for the user to indicate a policy preference. Enter a Retain, Delete or Modify.

<i>Table 12-x. Plan Alternatives Comparison Chart: Goals and Policies, Standards and Implementation Measures</i>					
<i>Plan Alternative</i>		<i>Goals & Policies</i>		<i>Staff Remarks</i>	<i>Vote: R, D, M</i>
A	B			IS-G1 Adequate Infrastructure and Services Provide a full range of adequate public infrastructure and services in support of existing and new development to the extent reasonably possible recognizing funding limitations.	M
A	B	C		IS-G2 Health and Safety. Provide and maintain infrastructure to protect community health and safety to the extent reasonably possible recognizing funding limitations.	M
A	B			IS-P1 Adequate Public Infrastructure and Services Standards. Consider establishing Establish and utilize ing adequate public infrastructure and services standards to: A. Ensure that Promote infrastructure and services needed to support new development, that meet or exceed level of service standards established by the County, are available concurrent considered with the timing of such development; B. Encourage development within infill areas where infrastructure and services are available; and C. Achieve acceptable levels of service (LOS) standards through improvements funded by fair share impact fees and other exactions, planned capital improvements, and the establishment of other service funding mechanisms.	M
A	B			IS-P2 Project Review and Findings. The impacts of new development on public infrastructure and services should be determined during the project review process. and be based on adequate public	M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			infrastructure and services standards adopted by the Board of Supervisors. As part of project approval, specific findings shall be made which relate to the demand for new public infrastructure and services and how the affect of this demand on adopted levels of service.		
A	B		IS-P3 Requirements for Discretionary Development. Adequate public infrastructure and services shall be used to determine infrastructure and services requirements for new discretionary development. Projects which do not currently have adequate public infrastructure and services, and cannot provide adequate public infrastructure and services concurrently with the new development, shall be scheduled for hearing before the appropriate hearing body with a staff recommendation for denial, on the grounds that the project is inconsistent with the goals, policies, and standards of Community Infrastructure and Services Element of the General Plan.		D
A	B	C	IS-P4 Fair Share Cost Allocation. New development, not existing development, shall pay the cost of providing infrastructure and services needed to serve the development, based on the demand for infrastructure and services that can be attributed to the development.		R
A	B		IS-P5 Comprehensive Development Impact/Fiscal Impact Study. Prepare and regularly update a comprehensive development impact/fiscal impact study that quantifies the relationship between new development and the need for additional public facilities and services. The comprehensive development impact/fiscal impact study shall be used as the basis for establishing measures such as fees, special taxes, and special assessments to off-set the impacts to municipal services and capital facilities.	This should be answered by the Winzler & Kelly Infrastructure Study Report	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P6 Infrastructure and Services Funding Sources: Establish broad based funding sources for public facilities and services that benefit current and future residents of the County.		R
A	B			IS-P7 Range of Municipal Services. Encourage existing special districts serving urban areas to expand the range of services they provide, or encourage the creation of new special districts, to ensure that a full range of community infrastructure and services are available to meet community needs.		R
A	B	C		IS-P8 Coordinate with LAFCo. The Planning Department shall Coordinate with special districts, cities, LAFCo and other local service providers to improve information on public service availability, capacity and needs, demographics, and development patterns <u>by reviewing and commenting on proposed spheres of influence, municipal service reviews, annexations, and changes in organization in order to ensure that adequate public infrastructure and services can be provided and for the purpose of maintaining consistency with the General Plan.</u> (FRWK 2622.3)		D
			D	Coordinate with LAFCo. The Planning Department shall Coordinate with special districts, cities, LAFCo and other local service providers to improve information on public service availability, capacity and needs, demographics, and development patterns. (FRWK 2622.3)		M
A	B	C		IS-P9 Spheres of Influence and Community Plans. Spheres of Influence, <u>Municipal Service Reviews</u> , and community plans shall be mutually compatible and supportive of one another for all applicable areas.* (FRWK 2622.1)		D
			D	Spheres of Influence and Community Plans. Spheres of Influence and community plans shall should be mutually compatible and supportive of one another for all applicable areas.* (FRWK 2622.1)		M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C		IS-P10 Data Supporting Community Planning. Data generated through developing spheres of influences and <u>Municipal Service Reviews</u> should be used to facilitate the preparation of community plans.* (FRWK 2622.2)		D
			D	Data Supporting Community Planning. Data generated through developing spheres of influences should be used to facilitate the preparation of community plans.* (FRWK 2622.2)		R
A	B	C		IS-P11 Monitor Infrastructure and Services Capacity. Monitor the capacities of infrastructure and services in coordination with service providers to ensure that growth does not exceed acceptable levels of service.		R
A	B	C		IS-P12 Plan Effectively to Minimize Costs. Plan public facilities in cooperation with service providers to minimize short- and long-term construction, operation, and maintenance costs.		R
A	B			IS-P13 Fiscal Impact Analysis. Use project specific fiscal impact analyses for major development proposals to ensure that approvals do not result in a fiscal impact on the County and other services providers.		D
A	B	C	D	IS-P14 Sizing of Facilities: Through development review, the County shall ensure that facilities are adequately sized to accommodate the proposed development and, if applicable, allow for extensions to future developments.		R
A	B	C		IS-P15 Reimbursement. In order to encourage orderly development, the County may require new development to install off-site infrastructure improvements in excess of fair share capacity and utilize funding mechanisms to reimburse expenditures in excess of the fair share costs.		R
A	B	C		IS-P16 Correct Inadequacies. Coordinate with other service providers to establish infrastructure priorities and correct existing inadequacies in community infrastructure and services systems.		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C	IS-G3 Storm Drainage & Flood Control Safety and Functionality. Provide a safe, functionally effective, well-designed, -built and -maintained storm drainage and flood control system that protects the people and resources of the County.		R
A	B	C	IS-G4 Sustainable Capital Facility Financing. Sustainable revenue sources that protect the County's investment in its capital facilities through adequately funded storm drain and flood control maintenance and improvement activities.		R
A	B	C	IS-G5 County Coordination for System Planning and Management. Consistent County-wide drainage system design standards and maintenance and improvement implementation criteria.		R
A	B	C	IS-P17 Storm Drainage Master Plan. Prepare and update a storm drainage master plan for storm drainage and flood control structures, capacity and condition assessment, and development of a Capital Improvement Plan prioritizing strategy that preserves, enhances and prioritizes investments as follows: A. Priority 1: Safety and system preservation. B. Priority 2: Functional efficiency and functional capacity.		R
A	B	C	IS-P18 Storm Drainage Design Standards. Prepare consistent storm drainage design standards for new development based on a design storm with specified intensity, frequency and duration standards.		R
A	B		IS-P19 Low-Impact Development Standards. Develop storm drainage development guidelines with possible associated impact fee discounts to encourage low-impact development standards to reduce the quantity and increase the quality of stormwater runoff from new developments.		R
A	B	C	IS-P20 Fish Passage Designs. Retrofit existing drainage and flood control structures and design new structures to		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				facilitate fish and other wildlife passage, in accordance with federal and state guidelines.		
A	B	C		IS-P21 Funding Sources and Mechanisms. Preserve and enhance storm drainage investments.		R
A	B			IS-P22 Coordinated Agency Activities. Work with other drainage and flood control infrastructure service providers (e.g., Army Corps of Engineers, city public works departments, Regional Water Quality Control Board, USEPA) to coordinate activities related to drainage and flood control system design, development, operations and maintenance where such coordination will result in greater operational and economic efficiency for the overall system.		R
A	B	C		IS-G6 Effective Law Enforcement Service. Provide effective, efficient and timely response to calls for County law enforcement services.	Covered under master law enforcement plan – should not be in element	D
A	B	C		IS-G7 Sustainable Financing Sources. Provide adequate and sustainable sources of funding for Sheriff's Office personnel, equipment and facilities.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-G8 Integration with other Entities. Provide integrated County departmental and city/state agency planning and administration.	Covered under master fire plan and master law enforcement plan – should not be in element	D
A	B			IS-P23 Level of Service Standards. Develop level-of-service standards to determine the impacts of new development to maintain Sheriff's Office services levels.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-P23 Funding Sources. Establish sustainable funding sources to support adequate Sheriff's Office service levels.	Covered under master law enforcement plan – should not be in element	D
A	B			IS-P24 Planning and Community Design. Integrate safety and security measures in land use planning decisions to assist in crime prevention and quality of life enhancement through physical planning and community design.	Covered under master fire plan and master law enforcement plan – should not be in element	D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B	C		IS-G9 Adequate Fire Protection. Provide adequate fire protection for people, property, and communities.	Covered under master fire plan – should not be in element	D
A	B	C		IS-P26 Level of Service. Work with the Humboldt County Fire Chief's Association to develop appropriate level of service standards.	Covered under master fire plan– should not be in element	D
A	B			IS-P27 New Development Within District Boundaries. No new discretionary development resulting in structures intended for occupancy shall be approved unless the County finds that the proposed project is located within the boundaries of a fire related district, or the project approval is conditioned upon one of the following: A. If the project site is not located within the boundaries of a fire related district, approval shall be conditioned upon the annexation to an existing adjacent fire related district or annexation to a county service area established to provide fire protection services, and the establishment of an appropriate funding mechanisms to ensure that the district has adequate capacity to provide services, B. If the project site is not located within the boundaries of a fire related district and condition A is not feasible, approval shall be conditioned upon the establishment of an adequate ongoing funding source and the execution of a fire protection agreement with a local fire service provider, subject to approval by LAFCo.	Covered under master fire plan and master law enforcement plan – should not be in element	D
A	B			IS-P28 Development Review. Coordinate with fire protection service providers in the review of new development applications to ensure that fire protection facilities necessitated by new development are constructed through exactions or funded through fees, or other appropriate assessments on new development.	Covered under master fire plan– should not be in element	D
A	B	C		IS-P29 District Boundaries. Encourage the Humboldt LAFCo and fire service providers to adjust district boundaries to eliminate service area gaps and, where	Covered under master fire plan– should not be in element	D

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			appropriate, consolidate districts for greater efficiency.		
A	B	C	IS-P30 Expanded Fire Protection Services. Encourage the expansion of existing, or the establishment of new fire related special district boundaries, as a means to provide fire protection services to unprotected and under-protected areas of Humboldt County.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P31 County Service Area. Where existing fire related districts cannot feasibly be expanded or new districts feasibly established to serve existing or proposed development, establish a County Service Area and adequate ongoing funding source and the execution of a fire protection agreement with a local fire service provider.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P32 Ongoing Funding Sources. Support the efforts of fire related districts to establish and maintain funding sources such as impact fees, special taxes, and special assessments to support adequate infrastructure and services standards as well as to improve fire protection service levels.	Covered under master fire plan and master law enforcement plan – should not be in element	D
A	B	C	IS-P33 Pooling Costs. Support the establishment of funding and resource pools to reduce administrative and operational costs of local fire service providers including items such as insurance, purchasing, and vehicle maintenance.	Covered under master fire plan– should not be in element	D
A	B	C	IS-P34 Countywide Coordination. Support the ongoing communication and coordination between local fire service providers.	Covered under master fire plan– should not be in element	D
A	B		IS-G10 Water and Wastewater System Standards. Assure safe, functional, effective, water and wastewater systems that ensures high-quality service, and protection of the people and resources of the County		R
A	B		IS-G11 Sustainable Capital Facility Financing. Assure sustainable revenue sources that protect service provider investment in capital facilities through adequately funded water and wastewater		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

			system maintenance and improvement activities.		
A	B		IS-G12 Interagency Cooperation. To provide coordinated planning among County/cities/service districts/federal and state water resource agencies for system design, development, operations and maintenance to ensure efficient, timely and equitable operation and maintenance.		R
A	B		IS-P35 Water Resource Assessment. Encourage and support more research and evaluation of the County's water resources by Federal, State and local water resources agencies.		R
A	B		IS-P36 Water and Wastewater System Capital Improvement Planning. Support the development and regular update of capital improvement programs for water and wastewater service providers that preserve, enhance and prioritize investments in the construction, operation and maintenance of the water and wastewater systems.		R
A	B		IS-P37 Water and Wastewater Capacity. Regulate the density and timing of new development consistent with water and wastewater system capacity. The County shall coordinate with special districts to maintain data on water and wastewater facility capacity.		R
A	B		IS-P38 Funding Sources and Mechanisms. Support the development and update of long-term, secure, sufficient, timely and equitable funding sources and mechanisms for water and wastewater system operation, including user fees, ongoing assessments and grant funding for service providers where appropriate.		R
A	B		IS-P39 Development Review. Coordinate with Support water and wastewater service providers in the review of new development applications to ensure that infrastructure upgrades necessitated by new development are in place and constructed through exactions or funded through fees, or other		M

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				appropriate funding sources relating to new development.		
A	B	C		IS-P40 Service Commitment for Proposed Development Project. The County shall require that projects requiring public water and wastewater service receive commitments from the appropriate district or agency prior to receiving tentative approval from the County.		R
A	B			IS-P41 On-Site Sewage Disposal Requirements. Update the regulations governing on-site sewage disposal systems to protect health and safety and to reflect changes in State law and advances in treatment technologies.		R
A	B			IS-P42 Interagency Coordination/Integration. Encourage coordination among water and wastewater service providers through the integration and shared use of standards and capital improvement planning.		R
A	B			IS-P43 Coordinated Agency Activities. Work with other regulators and service providers ((e.g. service districts, city public works departments, Regional Water Quality Control Board, and the California Department of Health Services, etc) to coordinate water and wastewater system design, development, operations activities and maintenance where such coordination will result in greater operational and economic efficiency for the overall system.		R
A	B			IS-P44 Influencing State Regulations: Support the actions of local water and wastewater service providers to enact or prevent legislation or state regulations that could impact the ability of the County and surrounding service providers to meet General Plan goals.		R
A	B			IS-G13 Broad Range of Parks and Recreation Services. Provide a full range of parks and recreation services available to meet community needs.	Move to Open Space Element	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P45 Local Parks and Recreation. Encourage special districts to provide local parks and recreation services in Humboldt County communities.	Move to Open Space Element	
A	B			IS-P46 Parks and Recreation Service Providers. Ensure that adequate parks and recreation service are provided by encouraging existing districts providing such services to expand their district boundaries to include adjacent urban areas and/or encouraging existing special districts serving urban areas to seek LAFCo approval to provide parks and recreation services.	Move to Open Space Element	
A	B			IS-P47 Parks and Recreation Funding. Support the efforts of parks and recreation service providers to establish and maintain adequate sources of funding for such services through user fees, special taxes and assessments.	Move to Open Space Element	
A	B	C		IS-P48 Joint Use Facilities. Encourage the utilization of schools, especially in rural areas, as community centers for activities such as public meetings, continuing education, recreation, and cultural events. Joint public-private development of recreation facilities shall be encouraged.	Move to Open Space Element	
A	B			IS-P49 Dedication or In-lieu Fee Requirements. Humboldt County shall require all new residential development to offer to dedicate land or pay a park fee for public parks sufficient to achieve the above <u>park standards contained in the General Plan.*</u> (MCP 4322.2)	Move to Open Space Element	
A	B			IS-P50 Parkland Dedication. As new development is approved, the goal of this Plan is to ensure that the combined amount of Humboldt County and local park land provided by a special district authorized to provide parks and recreation services meet the following <u>minimum criteria</u> standards: A. Community park land at 3 acres per 1,000 population. B. Neighborhood and mini park/tot lots at 2 acres per 1,000 population (MCP 4322.1).	Move to Open Space Element	

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P51 Parkland Terrain. The terrain of park sites should be suitable to accommodate both active and passive recreational activities.* (ECP 4420.3)	Move to Open Space Element	
A	B			IS-P52 Park Location. Parks should be located and sized and should contain appropriate facilities to serve both the existing and projected population within each service radius.* (ECP 4420.4)	Move to Open Space Element	
A	B			IS-P53 Services Available to Parks. Park sites should be provided with adequate water supply, sewer, police law enforcement and fire protection services, and should be accessible by foot, bicycle, and automobile. (ECP 4420.4)	Move to Open Space Element	
A	B			IS-P54 Locate Parks in Residential Areas. Neighborhood and community park and recreation facilities should, to the extent possible, be located in predominantly residential areas.* (ECP 4420.5)	Move to Open Space Element	
A	B			IS-P55 Park Dedications Held in Perpetuity. To the extent possible, all parklands should be dedicated and held inviolate in perpetuity, protected by law against diversion to non- recreational purposes and against invasion by inappropriate uses.* (ECP 4420.6)	Move to Open Space Element	
				IS-P56 Private Parks. The development of private sector recreation facilities shall be encouraged in addition to the above, but shall not substitute for them.* (MCP 4322.4)	Move to Open Space Element	
A	B	C	D	IS-P56 Private Parks. The development of private sector recreation facilities shall be encouraged in addition to the above, but shall not substitute for them.* (MCP 4322.4)	Move to Open Space Element	
A	B	C		IS-G14 Public Safety. Utilize Consider utilizing properly located and adequately maintained street lighting services to protect community health and safety.		M
A	B			IS-P57 Improve Public Safety. Encourage the provision of street lighting services as a means to improve public safety and the nighttime travel.		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

A	B			IS-P58 Street Lighting Service Providers. Ensure Consider ensuring that adequate street lighting service are provided by expanding the boundaries of existing street lighting districts and encouraging existing special districts serving urban areas to seek LAFCo approval to provide street lighting services.		M
A	B			IS-P59 Street Lighting Funding. Support the efforts of street lighting service providers to establish and maintain adequate sources of funding for such services such as direct charges, special taxes and assessments.		R
A	B	C		IS-P60 Street Lighting Design. Encourage the use of street lights that direct light to the proposed illumination area with the minimum impacts on surrounding areas and the night sky		R
A	B	C		IS-P61 Development of Telecommunications Infrastructure and Services. Encourage development of telecommunications infrastructure and services to facilitate the use of the best available technology for communications and business.		R
A	B	C		IS-P62 Telecommunications Facility Siting. The County shall adopt a telecommunications ordinance to Identify areas where future commercial or public telecommunications facilities can be located, while minimizing the proliferation of antennas.		R
A	B			IS-P63 County Library Facilities and Services. Continue to assess existing and future needs of the County's residents and expand library facilities and services as necessary to meet those needs.	Should not be part of General Plan	D
A	B			IS-P64 Library Funding Sources. Seek funding sources for public libraries including federal and state grants, and where appropriate, seek to establish new fees, special assessments, and special taxes.	Should not be part of General Plan	D
A	B	C	D	IS-P65 Joint Use Facilities. The County should encourage joint (shared) school		R

**Table 12-x. Plan Alternatives Comparison Chart:
Goals and Policies, Standards and Implementation Measures**

				facilities and educational programs between school districts and other public agencies.* (FWRK 4820.2)		
			D	School Facility Siting. The County should work closely with local educational institutions to study alternatives to new facility construction or facility siting.* (FWRK 4820.1)		R
A	B	C	D	IS-P66 Location of School Facilities-Hazards. School sites shall not be located in areas exposed to hazards.* (FWRK 4820.3)		R
A	B	C	D	IS-P67 Location of School Facilities-Parks. Encourage new school facilities to locate near public parks or recreational facilities.* (FWRK 4820.4)		R
A	B	C	D	IS-P68 Location of School Facilities-Services. School sites should be located in areas provided with public water and sewer services, or where adequate on-site systems can be established.* (FWRK 4820.5)		R
A	B	C	D	IS-P69 Conversion of School Facilities. Conversion of closed school sites and facilities to other uses should be consistent with existing or planned land uses of adjacent areas.* (FWRK 4820.6)		R
A	B	C	D	IS-P70 County Facilities. All future projects and facilities proposed by any agency of County government shall be reviewed for consistency with this General Plan or with applicable city General Plans.* (FWRK 4920.1)		R
A	B	C	D	IS-P71 County Facilities-Siting. County facilities should be sited and designed for present use and expected future expansion.* (FWRK 4920.2)		R
A	B	C	D	IS-P72 County Facilities-Accessibility. County facilities should be easily accessible and promote citizen use.* (FWRK 4920.3)		R
A	B			IS-P73 County Facilities-Funding. Require new development to pay its fair share of new mandatory County facilities to the extent reasonably possible recognizing funding limitations..		M