

# GENERAL PLAN ANALYSIS OF CHANGES FROM 2010 TO 2013

The General Plan (GP) is 200+ pages long and includes text, charts and tables. This Analysis identifies all the changes that have been made to the GP since it was revised by the Planning Commission in open hearing in 2010. Most of the changes have been made in 2012 and 2013 by current Council members. From public documents, at minimum, a majority of Council members have personal residences, financial interests or family affiliations that are newly protected by the changes they have made.

## THE PROCESS

I visually compared all the text of each Element in the 2010 GP version, which is posted on the City of St. Helena website, to the total changes identified as such in two Staff Reports to the City Council by Interim Planning Director Desmond, November 12, 2013 and November 26, 2013. See Staff Reports. Changes since November 26, 2013 are not included in this report.

Many changes were statistical updates; many positively strengthened the values expressed in the 2010 GP and many clarified confusing issues. However, many deletions or insertions by Council members were done to protect their own financial or personal interests or they introduced personal ideology that was not there before and may not respect the vision of the general population when they participated in formulating a new update of the 1993 General Plan. Of particular concern were changes that were a detriment to the broader public interest.

After identifying all changes, the next step was to sort which of the changes were detrimental to the public interest and nine of the Elements fell into that category: Community Design, Economic Sustainability, Land Use, Open Space, Parks & Rec, Public Facilities and Services, Public Health & Safety, Circulation and Climate Change. Since I am making that determination, these are my opinions; however, I urge everyone to double-check the 2010 GP, the Staff Reports, the lists of changes and come to your own conclusions.

## THE THEMES

In my analysis of the problematic changes, I identified several themes:

- The Fear theme -- fear of flooding, fear of poor people living next door, fear of loss of control, fear of not getting one's personal American dream, etc.
- The Washing theme: This is inserted descriptive text change which at first seems to support the wishes of most people to keep environments natural, etc; however, it is most often applied to development sites that affect Council financial interests, such as a residence, while not applied to other areas of town. For instance, the concept that ag should be literally everywhere, even though current zoning within the Urban Limit Line does not support this.
- The Simply Deny theme: These are usually deletions which deny reality by eliminating it from the GP -- for example, mention of the problematic job/housing imbalance that justifies affordable housing was deleted.
- The Paradox theme: These are changes which are contradictory to mainstream contemporary urban planning or instances where the changed GP simply contradicts itself in different sections, making it useless -- for example, situating all businesses on Hwy. 29.
- Magical Thinking theme: These would be examples of wishful thinking identified as though they were fact, like expecting so much bike riding that somehow traffic congestion on Main St. will cease to be a problem.

## GENERAL PLAN ANALYSIS OF CHANGES FROM 2010 TO 2013

- The Just Absent theme: This category includes topics which should have been upgraded to more urgent action items but were ignored since they might have generated evidence of the need for affordable housing, such as mention of the shrinking middle class or the need for reduction of emission from commuters.

Here is a partial list of sample topics that are unaddressed or have been diminished in this change process:

- a. Affordable housing.
- b. Support for the next generation, their needs and expectations, to keep them living and working in town.
- c. Senior housing.
- d. The importance of public convenience and safety in traffic circulation.
- e. Reduction of emissions caused by commuting traffic.
- f. The decline of the middle class and keeping St. Helena affordable for long-time families.
- g. Inclusion for Latino families.
- h. The benefits of a vibrant, diverse society and the means of making that work in St. Helena across income levels, class, race, age, etc.
- i. Concentric planning of the City center for walkability and public transit use.
- j. Extending roads to businesses and services and to the Trail to alleviate Main St. traffic.
- k. Multi-unit housing for all the categories of people who prefer a condo or apartment to single resident housing.
- l. Prioritizing side streets for local serving stores, since tourist serving stores are on Main St.

### NEXT STEP

The Council will next package all of the changes into the graphic version of the GP (inclusion of charts and tables) and present it for public comment. While they say changes will be highlighted, I urge you to compare any highlighted sections in their finished GP to the changes for each Element published on the General Plan page of the SHWindow website. There were many changes in the GP which were not identified as such in the Staff Reports.

In the public hearings on the Final General Plan to be scheduled presumably in the spring of 2014, St. Helena will be presented with a decision: Should the people reject the Council's changes in the 2013 version of the General Plan or accept them?

In June of 2014, the City must present the last Element, the Housing Element, to the State for approval. This Element must, by law, be accompanied by public hearings so officials will be pressed to get the process done by the deadline. There is the general expectation that the Final General Plan will be approved by that deadline also.

I urge everyone to review the changes, ask yourselves if you are content or not content with the General Plan and the changes as it now stands and if you can imagine using it as our guiding document until 2030? The volume and precision of the changes (and the time spent) that were made by the current Council are ample testimony to the importance of the GP to the future of St. Helena. It's concepts and recommended actions will guide future Councils as disputes arise until 2030.

Thank you,  
Sandra Ericson

**2013 ST. HELENA GENERAL PLAN PROBLEMATIC  
CHANGES BY ELEMENT IN COMPARISON TO THE 2010  
REVISED GENERAL PLAN PRESENTED TO THE PUBLIC  
BY THE PLANNING COMMISSION**

ANALYSIS BY SANDRA ERICSON, DECEMBER 2013

©Sandra Ericson 2013

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE INFERENCE	LAND USE CHANGES
<p>There is no point in going back to workshops and surveys before the 1993 GP Update was adopted. The Update itself is the outcome, and is the source document. The 1993 GP Update stated that the community has supported slow growth, consistently with the ability to provide urban services.</p> <p>A justification of their anti-growth policies. The phone survey results and origin need to be checked. The buzz words, “small town character” are inserted wherever possible.</p>	<p><b>The increasing pressures to grow caused serious concern in the community back in the 1970's, and resulted in a Growth Management System in the late 1970's. At that time, public workshops and a phone survey conducted for the 93 GP Update indicated that the principle land use concern was the rate of growth in the City. The community was generally concerned that there would b a loss of charm and beauty, increased traffic conditions, and an Inadequate water supply. For the 2030 GP Update, a phone survey, Town Hall meeting and mail-in survey were conducted, and the community still highlights all these concerns ·increased traffic, inadequate water and preservation of small town character. Therefore, the City should follow the long-standing philosophy that growth in St. Helena should be carefully managed, and that each of these decades-long public concerns are adequately addressed in future land use determinations.</b></p>
<p>This is a variation of the bait &amp; switch technique in which wineries (supported by public opinion) are used to park low income housing. The next step is to count this housing as part of our ABAG obligation but it does not include anyone else, only wineries’ own employees and conditions may not be assured -- for children, for instance. Plus, there is no assurance that it will be affordable -- could be for execs.</p>	<p><b>However, wineries in AG land may utilize a small portion of onsite land for provision of affordable employee housing thus alleviating some of the low and moderate housing needs in the City, while simultaneously reducing commute traffic.</b></p>
<p>This is to prevent roads from being extended near their financial interests by insisting that they do not support public activities. This isn’t legal.</p>	<p><b>Roads are part of Open Space, but are not contributors to natural resource, public health, recreation, etc. as stated above.</b></p>
<p>The Association of Bay Area Governments which determines growth &amp; housing plans regionally, states that growth should occur concentrically around city centers -- near transit and services. There is no relationship between the GMS and our RHNA allocation. Here, the ABAG language is used conversely to prevent concentric growth around the St. Helena city center by applying the language to opportunity sites that branch out from the city center, areas that might encompass their financial interests and may or may not be near transit.</p>	<p><b>Residential Growth Management System</b>  <b>The Residential Growth Management System limits the number of building permits available for residential growth each year The GMS should reflect the current adopted ABAG RHNA number for a given cycle. This will serve to ensure alignment with the the larger Bay Area's growth direction which encourages development near transit and service centers (PDA = Preferred Development Area). ABAG strategy indicates that development outside the non-targeted PDA's encourages growth and sprawl, contributes to traffic congestion and environmental impacts such as reduced air quality and loss of open space and Agricultural lands.</b></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE INFERENCE	LAND USE CHANGES
<p>"Fingers of green" within the ULL is an oxymoron. The point if the ULL is to preserve the fingers of green inside City limits. Is the Council suggesting that the ULL should be expanded? Language is designed to protect their financial interests by appealing to values that are popular here. It also provides another place to insert "rural, small town". St. Helena does not lack fingers of green as may be true in large cities.</p>	<p><b>--Preserve agricultural, green and open space within the ULL to ensure the City maintains a rural and small town character with sufficient "fingers of green", particularly in light of St Helena's long standing significant inadequacy in park land. (See Parks and Recreation Element).</b></p>
<p>Deletion removes all mention of new growth and the implication that it can be well managed. Without managed new growth, it is difficult for the next generation to stay here and succeed.</p>	<p><b>Maintain community character by requiring high-quality design and management of new growth, and avoid "big box" development patterns and styles for commercial, industrial, and residential growth.</b></p>
<p>Council members want to annex Meadowood for the tax income; however, this would deplete County income used for social services, etc. The Council tried to get LAFCO approval for this and was denied.</p>	<ul style="list-style-type: none"> <li>• Despite its relatively small population, St Helena functions as a service center for surrounding towns and unincorporated areas, including <b>Meadowood, Mddrone Knoll, Calistoga, Angwin, Deer Park, Rutherford</b> and the unincorporated area south of St Helena. Through efficient land use planning, the City can ensure that St Helena continues to serve this function while meeting the needs of its residents.</li> </ul>
<p>While, the point of the ULL is to prohibit housing development outside of the ULL, it is unclear here whether or not this would preclude extensions of roads that go outside the ULL.</p>	<p>LU1.2 Allow urban development to occur only within the Urban Limit Line. <b>Consider an exception for worker housing on agricultural lands.</b> Urban services such as sewer, water and storm drainage will only be extended to development within the Urban Limit Line.</p>
<p>This is a conundrum since this GP limits many business and housing opportunities which generate income.</p>	<p><b>Increased revenue generation for St. Helena is key to achieving other goals for the community as without additional financial resources we limit and restrict our abilities to pursue and achieve such goals.</b></p>
<p>Language inserted here to make it possible to annex Meadowood.</p>	<p>The Urban Limit Line may only expand when the amount of developable land within the Urban Limit Line is insufficient to implement the General Plan policies <b>or when logical to include developed lands receiving urban services (from the City.</b> Expansion outside the Urban Limit Line should first be considered in Urban Reserve Areas. Expansion into other areas outside the Urban Limit Line should be considered only when the proposed land use is found to further the goals and long-term objectives of the City and does not result in adverse impacts to adjacent uses in either the urban or rural areas.</p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE INFERENCE	LAND USE CHANGES
Infill is always a good policy but not to the exclusion of affordable housing. In this addition, even that is to be only encouraged. Substitution of action verbs to the passive “encourage” weakens the GP and makes future Council decisions more subject to political pressure to serve special interests and not the public.	LU1.4 In order to minimize and postpone the need for expansion of the Urban Limit Line, <del>focus on</del> <b>encourage</b> infill development within currently developed areas
”Logical and orderly” would normally means around the City Center and in areas where there is land available, both would encompass housing and business opportunities near their financial interests.	LU1.6 Require new development to <del>occur in a logical and orderly manner within well-defined boundaries and</del> be subject to the ability to provide urban services, including the policies and implementing actions affecting new development as set forth in Chapter 4.
Deletion of the possibility more flexible design standards in building styles throughout the City, making more modern designs not easily approvable. This limits diversity among the people who live here and gives a “stamp of approval” to only what is here already. It limits the preferences of new generations as residential design evolves.	LU2.B Develop and implement residential design guidelines and/or form-based codes, to provide oversight and guidance for new buildings and renovations. Guidelines should ensure that new residential development is consistent with the design, size and footprint of older residences in the neighborhood. <del>Consider the impact of new development on surrounding residences, such as solar access. Explore opportunities to establish a neighborhood categorization system that allows for strict design standards in historic neighborhoods and more relaxed or creative standards in others.</del> (Also see the following elements: Community Design, Topic Area 3; and Economic Sustainability, Topic Area 3)
Substitution of action verbs to the passive “encourage” weakens the GP and makes future Council decisions more subject to political pressure to serve special interests and not the public.	LU3.10 Require <b>Encourage</b> office development within Mixed-Use, Service Commercial and Central Business districts to complement the pedestrian orientation of surrounding development.
These deletions are contradictory to their support of bike access elsewhere but are included here because it includes autos and would promote connecting roads near their financial interests. So residents would have to take longer to access businesses with more route difficulty, traffic on existing roads and more CO2 in the air.	<del>LU4.C Develop alternate automobile, pedestrian and bicycle routes to and from the Industrial District in order to facilitate access to the area and decrease the need to use State Route 29.</del>  <del>LU4.D Implement appropriate traffic improvements to provide safe ingress and egress to the industrial areas from State Route 29.</del>
This strong addition again protects their financial interests.	LU5.I Support and protect agricultural uses within and adjacent to the City. <b>Do not convert existing farmland to no non-ag uses whenever possible.</b>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE INFERENCE	LAND USE CHANGES
<p>This strong addition again protects their financial interests.</p>	<p>LU5.3 <b>Strictly</b> limit development on properties existing at the time of the adoption of this General Plan that are designated or used as agricultural land.</p>
<p>This deletion is designed to make it more difficult to build near their financial interests by preventing the developer from purchasing for substitution farmland for housing land, as would have been allowed.</p>	<p>LU5.F Evaluate discretionary, rezonings, or General Plan amendments to determine their potential for impacts on Prime Farmland, Unique Farmland, or Farmland of Statewide Importance mapped by the State Farmland Mapping and Monitoring Program and avoid converting these farmlands. <del>where feasible. Where conversion of farmlands mapped by the state cannot be avoided, require long-term preservation of one acre of existing farmland of equal or higher quality for each acre of state-designated farmland that would be rezoned or re-designated to non-agricultural uses. This protection may consist of establishment of farmland easements or other similar mechanism, and the farmland to be preserved shall be located within the City and preserved prior to approval of the proposed rezoning or General Plan amendment.</del></p>
<p>The addition of a buffer requirement is to protect personal property in the event of development. This makes it more expensive to have business or housing near agriculture and prevents economic enterprise. Since we are surrounded by agriculture, this again protects their financial interests but restricts a significant portion of the larger community.</p>	<p>LU5.G <b>Where proposed residential, commercial, or industrial development abuts lands devoted to agricultural use, require the non-agricultural uses to incorporate buffer areas to mitigate potential land use conflicts as a condition of approval for subdivision or use permit.</b>  <b>The type and width of buffer areas shall be determined by the City based on the character, intensity, and sensitivity of the abutting land uses.</b> Prepare and adopt guidelines and regulations to assist in the determination of the appropriate type and scope of agricultural buffer areas needed in circumstances that warrant the creation of such buffer areas.</p>
<p>Since growth is discouraged throughout the GP, community facilities are being discouraged also. Parks are invariably mentioned since everyone is for them. The Council wants City Hall to move to Adams St. (Council offices?) but does not wish Adams St. to be used for community purposes, as was envisioned by the community, only for public offices.</p>	<p><b>LU6.B Pursue sites for future public facilities including parks. consistent with projected growth.</b> <del>Explore the feasibility and desirability of moving public facilities to the Adams Street property.</del></p> <p><b>LU6.C Explore the feasibility and desirability of moving public facilities to the Adams Street property.</b>  <del>Install community amenities, such as public restrooms, drinking fountains, benches, and trash and recycling containers in commercial districts. Ensure that community amenities are designed and installed to complement surrounding businesses and support the pedestrian-orientation of the street.</del></p>



## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	ECONOMIC SUSTAINABILITY CHANGES
<p>This new introduction to this Element sounds good and it would be good to have an Economic Sustainability Plan but it is also an excellent run-up to the questionable plan outlined in the last addition, E3.C</p>	<p><b>During the recession, local businesses and the City of St. Helena experienced the negative impacts of the recession with decreased sales revenue and corresponding decreased tax revenue. The City was forced to deplete a portion of its reserves during this difficult time period. As a result of these negative impacts, the local community and the City of St, Helena have realized the importance of short and long term economic sustainability within our community. Furthermore, the City has realized it is imperative to establish a framework of goals, policies and implementing actions that will, to the greatest extent possible, ensure the economic sustainability of our town, and provide us with tools to minimize the negative impacts associated with future economic recessions. The City should include develop a formal Economic Sustainability Strategy as well as associated tools such as a long term economic forecasting model that will allow the City to measure and predict the future impact of policy decisions and actions that are taken now and in the future.</b></p>
<p>This deletion flatly denies and removes from the GP one of the most obvious and pressing problems in St. Helena, the lack of housing for middle and lower income people who work here. Affordable housing here has been deliberately prevented, it has not occurred naturally as is implied.</p>	<ul style="list-style-type: none"> <li>• St. Helena has historically exhibited slow population, household, and housing growth. In recent years, employment growth, while modest, has out paced housing growth. This has led to an increasing shortfall in the number of homes available locally relative to the supply of local jobs.</li> </ul>
<p>Here again, a flat denial of a very impactful local problem which causes traffic congestion, air pollution, poor services, lack of local spending and lack of loyalty and commitment to St.Helena by workers who live elsewhere. Taking this out of the GP is major error.</p>	<ul style="list-style-type: none"> <li>• <del>The City functions as an employment center for the region, with nearly two jobs per employed City resident. Furthermore, in 2000 nearly 80 percent of St. Helena workers commuted into the City for work but lived elsewhere, and this pattern is expected to continue. More recently, a 2008 Napa County Transportation and Planning Agency (NCTPA) study included a similar analysis of commute data for the City of St. Helena and surrounding unincorporated areas. Findings from this study demonstrate that, even when expanding the study area beyond City limits, approximately 60 percent of employee commutes originated elsewhere in Napa County and the surrounding region.</del></li> </ul>
<p>Again “small town character” washing when, in fact, without economic diversity, few small towns can be economically successful at this time and into the future.</p>	<ul style="list-style-type: none"> <li>• <b>St. Helena’s identity as a historic, small city with a strong agricultural heritage is a unique economic development resource that local policies and regulations should protect and enhance. City policies should encourage promotion of St. Helena’s authentic small-town character in order to enhance economic opportunities for local businesses.</b></li> </ul>



## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	ECONOMIC SUSTAINABILITY CHANGES
<p>This clearly serves to minimize the affordable housing problem here and is being deleted to take the pressure from the need for affordable and/or multi-unit housing.</p>	<ul style="list-style-type: none"> <li>• Housing affordability is a key issue in St. Helena. The minimum income required to afford to purchase a single family home in St. Helena is well over three times the City's median household income. Workforce housing availability may be a key constraint to further local economic development.</li> </ul>
<p>However, the problem is undeniable so here the word "may" is inserted to allow for such a possibility.</p>	<ul style="list-style-type: none"> <li>• Housing affordability is an important issue in St. Helena. <b>Workforce housing availability may be a key constraint to further local economic development and therefore short and long term economic sustainability.</b></li> </ul>
<p>Repeat: This clearly serves to minimize the affordable housing problem here and is being inserted to take the pressure from the need for affordable and/or multi-unit housing.</p> <p>This deletion supports the concept that high rents and appraisals are preferred both commercially and residentially. Paradoxically, this restricts small, locally serving businesses, leaving them nowhere to go. Exclusivity and survival of the most well-funded is the concept instead of inclusivity and community cohesion.</p>	<p><del>3.3</del> Key Findings and Recommendations There are several challenges and opportunities facing St. Helena related to economic sustainability. The following key findings and recommendations are based upon comprehensive existing conditions analysis and community input.</p> <p>Among community members, there are divergent ideas regarding regulations that attempt to differentiate between local-serving and tourist-serving activities. Some community members feel that General Plan goals and policies should continue to make this distinction between local and tourist serving uses, but that policies and accompanying regulations require more specific definitions.</p> <p>The lack of workforce housing greatly impacts the economic sustainability of St. Helena businesses. In the past, local business owners have found it difficult to fill open positions. This difficulty has negatively impacted their business operations. Increasing the supply of affordable workforce housing is critical to maintaining St. Helena's quality of life and long-term economic sustainability.</p> <p>High demand for commercial space and corresponding high commercial rents impact the ability of some businesses supplying low-cost, everyday goods and services to locate or stay in St. Helena. Non-retail uses occupying ground floor retail spaces, such as real estate offices, further drive up demand and rents for commercial space in St. Helena. By limiting the non-retail use of ground floor spaces in key commercial areas, the City can provide a more supportive environment</p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	ECONOMIC SUSTAINABILITY CHANGES
<p>The term “smart growth” officially refers to the placement of housing near city centers to support public transit. A concept that has been disavowed in other sections of this GP. “Small town smart growth” is an invention of the Council to further justify no multi-unit housing and to deny the jobs/housing problem here.</p>	<p>ES1.4 Encourage the creation of workforce housing to reduce the negative impacts of the City’s jobs-housing imbalance and <b>in keeping with smart, small town/ smart growth</b> to support the local employment base. (Also see the Housing Element, Topic Area 1)</p>
<p>This deletion is a conundrum in that it appears to encourage larger businesses while at the same time it denies that St. Helena serves a larger area which would justify larger businesses. Again, illogical and more politically motivated than concern for local shopping.</p>	<p><del>Continue to discourage businesses whose consumer base requires a population larger than St. Helena and its vicinity. For the purposes of the General Plan, “vicinity” is defined as the surrounding towns and unincorporated areas for which St. Helena has historically provided goods and services, including Calistoga, Angwin, Deer Park, Rutherford and the unincorporated area south of St. Helena.</del></p>
<p>Changing ‘develop’ to ‘encourage’ weakens the overwhelmingly important necessity to become more ecologically responsible in the control of air pollution. This is meant to discourage roads near their financial interests.</p>	<p>ES2.4 City will <del>develop</del> <b>encourage</b> green options to circulate citizens and tourists throughout the community.</p>
<p>This insertion retains all lodging options including chain hotels which are apparently permitted since they are not banned either here or in ES2.A. One obvious contradictory problem is the water availability concern in the GP for housing but not for hotels &amp; restaurants which use a lot more.</p>	<p>ES2.A Continue to prohibit formula restaurants, outlet and chain discount stores and time-share lodging projects (<b>with the exception of Fractional Ownership Lodging and destination membership clubs????</b>), as defined in the St. Helena Municipal Code (Section 17.48.060).</p>
<p>Ditto</p>	<p>ES2.A Continue to prohibit formula restaurants, outlet and chain discount stores and time-share lodging projects, as defined in the St. Helena Municipal Code (Section 17.48.060). Update the Municipal Code to define and prohibit restaurants that solely provide take-out service. Update the Municipal Code to define and regulate fractional ownership lodging. (Note: completed in 2012.) <b>while but recognizing that the monies collected from hotel taxes provides a valuable and necessary source of revenue for the City. Remove the cap on the number of restaurants, but continue to prohibit formula restaurants. Remove the cap on the number of hotel and motel rooms.</b></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	ECONOMIC SUSTAINABILITY CHANGES
<p>This addition is a generally good policy but it would be even better if roads were connected so the shortest routes to schools were not restricted and fewer parents would need to drive children to school.</p> <p>It is not clear what is meant here -- buildings?, buses?</p>	<p>ES2.D Enhance the pedestrian environment within the commercial area, support the development of bicycle trails throughout St. Helena with the goal of connecting to a countywide system. Encourage the use of group transit options in order to decrease tourist-generated traffic congestion. (Also see the Circulation Element, Topic. <b>Encourage the use of pedi buses by the school district to guide children safely and in a more healthful and sustainable manner to school. (Also see the Circulation Element, Topic . Area 2.)</b></p> <p><b>ES2.E Consider program to allow destination clubs and other lodging programs that contribute to the City's TOT revenue stream.</b></p>
<p>These indicate a lack of support for business in general but, even more seriously, a lack of support for regulations that may be for the public good (environmental pollution, for instance) and a lack of support for cultural diversity and economic help which includes Latino businesses and those of young people starting out.</p>	<p><del>ES3.4</del> Support regulations that address the goals of the General Plan and positively impact the viability of local businesses and the community's financial health.</p> <p>ES3.5 Support cultural diversity through economic sustainability initiatives.</p>
<p>This addition opens the question of the Council buying and selling public property. The opportunities for conflict of interest here is very high and it seems to allow the Council to buy/sell public property at will under the guise that it will enhance city income. There is no question that partnerships and/or selling to private entities will enhance income but the deals described here make no mention of a public approval process or even public knowledge. Legally questionable without a public process.</p>	<p><b>ES3.C - Hire or retain economic development planning expertise to assist in creating and maintaining an Economic Sustainability Strategy and associated and necessary tools. -Facilitate and fast track projects generating significant City revenue that will not adversely impact the City's resources and are consistent with the General Plan, Municipal Code and CEQA. -Encourage partnerships between the City and private and/or nonprofit organizations to enhance the City's economic sustainability. -Consider leveraging City resources as feasible to enhance the City's economic sustainability, including the sale or long-term lease of the City Hall site and a private/public partnership for development of the City-owned property on Adams Street.</b></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	PUBLIC FACILITIES AND SERVICES CHANGES
<p>While this may currently be true, this should not be taken off the table in a 20 year GP. If drought conditions become the norm which is predicted by 2049 (see the Mora Study at Univ. of Hawaii), votes may be willing to build another reservoir or funding may be available from outside sources.</p>	<p><del>The City does not own land at a location suitable for such storage capacity, and at this time the cost of purchasing land and constructing such storage, a large capital cost, would not be fiscally justifiable to the water system's rate payers.</del>  <b>The City will explore recycling options as new and improved technologies improves.</b></p>
<p>Reminder of flood fear.  Flood project is complete. What is the point of this language at this time?</p>	<p><b>•The St. Helena Comprehensive Flood Protection Project is underway to address potential flood hazards in the 100-year floodplain of the Napa River. Key project objectives include constructing a floodplain terrace, removing 17 homes, installing a new flood wall and levee, and managing soil and vegetation resources along the Napa River. Continuing implementation of the Flood Protection Project is essential to ensuring St. Helena's protection from future flood events.</b></p>
<p>It is law that a water shortage cannot be used to exclude affordable housing. Seeking limits for all usage is best but this insertion is an attempt to provide a condition under which affordable housing could be denied anyway by citing a govt. code that does not apply to affordable housing and making it sound like it does apply. The last line is an attempt to ameliorate that bait &amp; switch.</p>	<p><b>PF1.8 The City shall develop and adopt regulations that would not allow approval of any project that would result in total potable water usage greater than 1900 acre feet per year unless either a) the project includes housing affordable to lower income households and a determination is made pursuant to Government Code 65589.7 that a "sufficient water supply" is available to serve that project and none of the exceptions set forth in 66589.7 (c) apply; or, b) new sources of water are made available to the City. Residential projects that contain affordable housing shall receive priority allocation of water.</b></p>
<p>This is blatantly directed at the Hunter project near their financial interests since its landscaping relies on well water, as many of the residences and wineries do in St. Helena.</p>	<p><del>PF1.FH Permit no new development relying on groundwater unless and until it is determined that the incremental production of groundwater to support the development will not adversely impact the water production capability of the aquifer supporting the City's wells. (Impacts Housing Element for landscaping that is on wells.)</del></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	CIRCULATION CHANGES
<p>Here the Council is incredibly hoping to make it sound like the number of people walking up and down Hwy. 29 and biking on trails will be all that is needed to reduce the traffic jams on Main St.</p> <p>They do not want streets near their financial interests to be extended and connect to businesses, etc.</p>	<p>Circulation Study Alternatives            In order to manage congestion and provide several new connections within the City several new extensions are proposed for further study. <del>In most cases, the proposed connections will provide alternate routes for residents to travel from one part of town to another without having to travel on State Route 29, which is frequently congested due to high regional traffic demand.</del>  <b>as non-automobile connections to promote the increased use of non-automobile based transportation man effort to reduce auto congestion within the City for further study These extensions may also serve as emergency vehicular routes to increase the safety of St Helena. In order to manage traffic on local streets. the study extensions provide for various levels of access to accommodate bicycle, pedestrian, golf cart and other non-automobile electric vehicles,</b> the study extensions in Fig. 2 include the following:</p>
<p>While acknowledging that Adams St. is a logical extension street, this insertion seeks to deposit traffic to Silverado Trail in someone else’s neighborhood that is not near the city center and does not have streets that are logically extendable and they are deteriorating.</p>	<p>5A/SB. Alternative extensions to access the Silverado Trail, by studying potential extensions of Adams Street or Mills Lane <b>or increasing the accessibility to the Silverado Trail via Pratt Avenue from downtown by creating an emergency route through the Crinella area.</b></p> <p><del>To reduce the attractiveness of the new streets as cut-through routes, vehicle turn restrictions may be implemented at particular locations.</del></p>
<p>The TMF program requires fees from developers to offset the cost of managing additional traffic or traffic related to the development. Reflecting a fear or the knowledge that biking and walking is not going to mitigate traffic very much (particularly since we have a significant number of retired people here who may not be that physically active), this word switch weakens the mandate to determine how much traffic can be and will be mitigated or not. “Exploring” accomplishes nothing.</p>	<p>CR4.F To ensure the multimodal Transportation Mitigation Fee (TMF) program serves as acceptable mitigation for the increase in traffic volumes resulting from buildout of the General Plan, the City shall <del>prepare and adopt</del> <b>explore</b> the TMF programs within 6 months of adoption of the General Plan Update. As part of this effort. the City shall conduct a fee study to ascertain whether the fees designated under the existing fee program should be revised. As part of the fee study development, the City should consult with other local agencies, including Caltrans and the California Public Utilities Commission (CPU C), to identify potential improvements to Main Street and to at-grade railroad crossings that could be incorporated into the TMF program.</p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	COMMUNITY DESIGN CHANGES
<p>Again, reinforcement of the concept of ‘rural small town’. The question is, when is a rural small town simply not moving forward, becoming economically unviable, not attracting younger people or visitors and not providing hope for its younger generation? At that point it infrastructure will suffer and stagnation will set in.</p>	<p><b>7.1 Purpose of the Element</b> By respecting established neighborhoods and historic assets, this Element provides guidance to <b>preserve</b> build-upon St. Helena’s distinct history and <b>rural small town town character</b>, while promoting new approaches to enhance future public and private development.</p>
<p>Statement altered to protect their personal residences and surroundings. The idea behind the ULL is to preserve agriculture outside the ULL but to allow development inside it. The development within it is not for the purpose of protecting agricultural uses and rural quality. It is the ULL that protects agricultural uses (outside the ULL) and the rural quality of the City and its surroundings.</p>	<p><b>7.3 Key Findings and Recommendations</b> The ULL helps define the City’s character by focusing evolution and change in the City’s central core. and protecting the agricultural uses and rural quality of surrounding areas. <del>Restricting</del> <b>Careful</b> development to-of areas within the ULL can help the City retain its historic and agricultural character while accommodating <b>well thought out</b> growth in coming decades <b>in order to protect the agricultural uses and rural quality of both the City and surrounding .</b></p>
<p>This is subtle but viewed through the lens of multi-unit housing, it puts more emphasis on keeping multi-unit housing away from existing homes, further from walkable distances facilities and more dependent on cars for transit, not public transit.</p>	<p>Design Review of new homes and remodels should continue to <del>to guard against</del> <b>promote, ensure and encourage</b> new homes or remodels that <del>do not</del> reflect the scale, proportion and/or building materials that characterize the surrounding neighborhood.</p>



## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	OPEN SPACE CHANGES
Denial of findings made at the time the GP was updated. This may refer to watershed or river?	<del>Many years of intensive use have adversely affected some of the City's natural resources.</del>
This deletion removes any possibility that project applicants can mitigate impacts by replacement actions to assure no net loss. Therefore, the application can be more easily denied because most sites can be defined as sensitive.	<del>OS1.H Require a biological assessment of any proposed project site where species or the habitat defined as sensitive or special-status by the California Department of Fish and Game, NOAA Fisheries or the U.S. Fish and Wildlife Service might be present. <b>Avoid to eliminate</b> potential impacts on sensitive resources as part of new development. <del>to the maximum extent feasible. Where complete avoidance is not possible, the project applicant must secure any required authorizations from jurisdictional agencies and provide adequate replacement mitigation to ensure there is no net loss in habitat acreage or values.</del></del>
Ditto	<del>Provide replacement habitat of like quantity and quality. <b>Already mentioned above and implies that removal will be allowed, which is opposite of protecting natural resources.</b></del>
Paradox -- in which the creek or fish are to be protected or a disturbance mitigated, but then protection of natural resources is deleted. This deletion removes from rivers and fish protections from agricultural practices and leaves agriculture as the dominating value.	<del>OS1.N Encourage local farmers to employ sustainable agricultural practices wherever possible. Ensure that implementation measures contribute positively to the preservation of the creek and its corridor, potential effects on anadromous fish such as steelhead and Chinook salmon are fully addressed, adequate mitigation is provided for any potentially significant impacts, and that any required authorizations from resource agencies is secured prior to any in channel disturbance. Support agricultural activities that incorporate best sustainable agricultural management practices including participation in local programs such as the Napa Valley Vintners - Napa Green Program and the California Certified Organic Farmers certification program.</del>
Again, mention of fish and creek preservation is eliminated and fear of flooding reinforced.	<del>OS1.O Conduct a study to determine <b>if the most appropriate method for managing and mitigating the natural</b> build-up of gravel in Sulphur Springs Creek to avoid the risk of flooding. Ensure that implementation measures contribute positively to the preservation of the creek and its corridor. <b>will result in a high risk of flooding. Limit development to non-flood risk areas using FEMA's 200 year flood zone at minimum, and help educate existing development to be aware of flood risks and available State and Federal insurance opportunities.</b></del>



## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	OPEN SPACE CHANGES
<p>By deleting ‘designated’ ag lands, those that are zoned agricultural, they are making it probable for any land to be officially considered agricultural, such as land near their personal property. At present, it is illegal to zone land agricultural after an applicant has submitted an application, such as the Hunter application.</p>	<p>OS2.1 Maintain agriculture as the mainstay of the local economy by preserving agricultural <del>designated</del> lands as an invaluable and irreplaceable open space resource. (Also see the Land Use and Growth Management Element for additional policies and implementing actions relating to agriculture.)</p>
<p>This sounds good and could be good but in the case of the proposed housing project near their financial interests (“in the vicinity”), it means that affordable housing is unlikely since it would drive the costs up. It makes it more likely that it would be market rate and be sold to more wealthy owners, a higher social class.</p>	<p>OS2.B Adopt a land dedication ordinance that requires developers to provide land and improvements, such as trails and re-vegetation, along both sides of water corridors as a condition of subdivision approval <b>for areas adjacent or in the vicinity of St Helena waterways</b>. The width of dedicated corridors should be established in consultation with the California Department of Fish and Game.</p>
<p>This removes monitoring and enforcement which will make compliance no better than it is now.</p>	<p>OS4.A Establish an urban forestry program to ensure a coordinated and comprehensive approach to maintaining and increasing the City’s trees. <del>Monitor and enforce compliance with program guidelines</del>. Key program aspects will include the following:</p> <ul style="list-style-type: none"> <li>• Appropriate Heritage tree deed restrictions.</li> </ul>
<p>This removes the obligation of the property owners from cleaning up contaminated sites that they own. Deletions of this sort in which owners are exempt suggest a political special interest.</p>	<p>OS4.E Create a remediation plan <del>to identify the location and extent of contaminated sites in St. Helena and develop a strategy to encourage property owners to address any necessary clean-up</del>. <b>which</b> The plan will include a comprehensive site identification, inventory and prioritization schedule, as well as a strategy for coordinating with State and Federal agencies, as necessary <b>to identify the location and extent of contaminated sites in St. Helena</b>.</p>

2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE INFERENCE	PUBLIC HEALTH, SAFETY CHANGES
<p>PS5.B. A Hunter project reference, designed to discourage development near their financial interests. I recall no such remaining flood control improvements in the FEIR for the Hunter Project. The CC should provide some background as to what it asserts are "necessary" flood control improvements. Throughout the GP, the fear of flood is reinforced repeatedly.</p> <p>PS5.C. Again, inserted for flood fear effect. Our sewer mains eventually all go through "flood" areas to get to the treatment plant. A break in a water line is not a source of contamination.</p> <p>PS5.D. Ditto</p> <p>PS5.E. Strong prevention of development in the area of their personal property -- see Flood map. Is the CC proposing a rezoning (down zoning) in any currently zoned MR or HD District? If so, it should lay its cards on the table. It likely would create conflict with other GP Elements -- including both Land Use and Housing.</p> <p>Seeks to avoid multiunit housing near their financial interests. The implementation of FEMA requirements is required in flood areas whether it is in the GP or not.</p>	<p><b>Implementing Actions</b></p> <p><b>PS5.B Require developers with land adjacent to the Napa River to construct or contribute a fair share toward the construction of necessary flood control improvements.</b></p> <p><b>PS5.C Strengthen and enforce regulations that prohibit the dumping of litter, fill and waste materials into creeks and waterways. Educate the public about flooding and health hazards associated with these activities.</b></p> <p><b>PS5.D Require that sewer and water lines in areas subject to flooding are sited to avoid contamination and flooding when pipelines break.</b></p> <p><b>PS5.E Prohibit the introduction of intensive urban development in designated Flood Hazard Areas.</b></p> <p><b>PS5.F Review Municipal Code Chapter 15.52, Flood Damage Prevention, to ensure that regulations reflect best practices. Periodically update the City's flood hazard regulations in accordance with FEMA/NFIP regulations.</b></p> <ul style="list-style-type: none"> <li>• Implement the requirements of FEMA relating to construction in Special Flood Hazards Areas as illustrated on Flood Insurance Rate Maps.</li> <li>• Implement low impact development practices for new development and redevelopment projects to reduce storm water peak flow rates and volumes from smaller, more frequently occurring storm events.</li> </ul>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	CLIMATE CHANGE CHANGES
<p>This change may be interpreted to address only the latest changed conditions instead of all existing conditions that could be considered.</p>	<p>10.3 Key Findings and Recommendations. Identifies key findings and recommendations based on an <del>existing</del> <b>the latest</b> conditions analysis and extensive community outreach (p. 10-8).</p>
<p>St. Helena did start out with a membership in ICLEI but discontinued that when Napa County became the lead agency in the creation of an Action Plan. More important is the Council is arbitrarily removing the reduction goal of 20%. Later, 15% is inserted. A lower reduction goal means less pressure to mitigate auto emissions and put housing closer to city center for walkability.</p>	<p>St. Helena has joined the International Council for Local Environmental Initiatives (ICLEI) and <del>is currently implementing an ICLEI-sponsored program to reduce greenhouse gas (GHG) emissions from City-controlled sources, with a goal of reducing the City's emissions by over 20 percent in the coming years. The program includes a thorough analysis of the City's GHG inventory, a targeted emission reduction strategy, and an implementation and monitoring process to provide a framework for ongoing reduction efforts.</del></p>
<p>Need to check these statistics -- transportation may be the largest in fact.</p>	<p>Table 10.1 presents 2005 and 2010 GHG emissions data in metric tons of CO<sub>2</sub>e for <b>the St. Helena community. In 2005, emissions community-wide emissions totaled 43,831 metric tons CO<sub>2</sub> e; in 2010 emissions totaled, 44,008 metric tons CO<sub>2</sub> e, a small increase of 0.4 percent. Table 10.1 shows the breakdown of emissions by sector. The largest source of emissions is from the commercial/industrial sector, which contributed 35 percent of total community-wide emissions in 2010, followed by the transportation sector (29 percent), residential sector (25 percent), off road vehicles and equipment (5 percent), agriculture (3 percent) and waste (2 percent). Emissions were reduced in all sectors except the transportation sector, which increased 36 percent. Emissions from the transportation sector are generated by automobiles and trucks traveling on local roads and include pass-through traffic.</b></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	CLIMATE CHANGE CHANGES
<p>This deletion removes the fact that St. Helena has the highest emissions per capita in the County -- an important fact in local awareness and efforts to reduce emissions. Emissions per job are also important since they are generated by commuters who cannot find affordable housing in St. Helena.</p>	<p><del>-per capita residential emissions, households and jobs. In 2005, St. Helena's estimated per capita GHG emissions were 1.77 metric tons of CO<sub>2</sub>e, and totaled five percent of Napa County's total CO<sub>2</sub> emissions. This figure is higher than any other residential per capita emissions in the County, and also higher than the County per capita average of 1.46 metric tons. In the same year, residential and garden emissions per household were 4.51 metric tons of CO<sub>2</sub>e, also totaling five percent of the County total for this category. Commercial/industrial emissions per job totaled 7.97 metric tons of CO<sub>2</sub>e, or four percent of the County's total emissions. Targeting climate change policies to reduce individual and household emissions is essential to achieving the City's long-term GHG reduction goals. Moreover, strengthening policies to improve commercial and industrial building efficiency, encourage vehicle fleet replacement and reduce employee vehicle miles traveled (VMT) can significantly reduce GHG emissions in the City.</del></p>
<p>They have removed information that the transportation sector has the largest emissions, unless in recent years this is no longer true. There has been no lessening of auto traffic since 2010, on the contrary, it has increased. All reference to justifying the need for work-force or affordable housing has been deleted.</p> <p>In order to make ag activities appear more attractive to people and lessen the justification for housing, reference to ag emissions, which are some of the highest for stationary emissions, were deleted.</p>	<p><del>The transportation sector is the largest generator of GHG emissions in Napa County, with mobile sources—automobiles and trucks—providing the greatest level of emissions. A 2006 Bay Area Air Quality Management District (BAAQMD) report indicated that approximately 55 percent of GHG emissions in Napa County resulted from mobile source emissions. The high cost of housing in St. Helena has resulted in a largely non-resident workforce, with employees living in neighboring cities and counties and commuting relatively long distances to work. By actively supporting the creation of workforce housing, the City can begin to address the current jobs-housing imbalance and reduce the number of vehicle miles traveled due to long commute distances.</del></p> <p><del>BAAQMD reports that in 2002 stationary emissions and area emission sources, such as emissions resulting from agricultural activities, natural gas distribution and waste disposal sources, accounted for approximately 45 percent of Napa County's GHG emissions. Within this figure, most of the emissions attributable to St. Helena were generated by the residential, commercial and agricultural sectors. Enacting policy provisions to address stationary and area emissions sources as part of a broad climate change effort is essential to meeting the City's long-range climate change goals.</del></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	CLIMATE CHANGE CHANGES
Here 20% is added back in. 15% appears in the next paragraph below.	<p><b>In 2012, the City adopted a GHG reduction target of 20 percent below 2005 levels by the year 2020. This target is consistent with the State’s goal to reduce California emissions to 1990 levels by the year 2020. Bay Area Air Quality Management District. 2006. Source Inventory of Bay Area Greenhouse Gas Emissions. San Francisco, CA. Through Assembly Bill 32 and other legislation, the State is implementing measures that will reduce emissions by improving fuel efficiency in vehicles, reducing the carbon intensity of transportation fuels, increasing the use of renewable power, and other actions. However, local action is needed to ensure St. Helena meets its reduction target.</b></p>
15% is back in.	<p>St. Helena is currently implementing a program to reduce greenhouse gas (GHG) emissions from City facilities <del>–controlled sources</del>, based on findings in the City of St. Helena Greenhouse Gas Emissions Reduction Action Plan Analysis (Final Report April 22, 2009) sponsored by the International Council for Local Environmental Initiatives (ICLEI). The City’s goal is to reduce citywide emissions by over 20 percent in the coming years. <b>15% below 2005 levels by the year 2020 .</b></p>
These new numbers seem unrealistically low.	<p>The City of St. Helena municipal operations emitted <del>1,007</del>, <b>506</b> metric tons of equivalent carbon dioxide (CO<sub>2</sub>e) during the year <del>2000</del> <b>2010</b>. Water and wastewater operations and employee commutes generated the largest proportions of total emissions (43.74 percent and 28.9 percent, respectively). <b>Water transport facilities accounted for 6 percent of emissions, followed by</b> buildings accounted for 24 percent of emissions, <del>(5 per cent)</del> and street lights (1%) <b>and government generated waste (less than 1 percent)</b> contributed <del>8 percent of total City-controlled emissions.</del></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	CLIMATE CHANGE CHANGES
<p>Again, reference to the high St. Helena emissions have been deleted thereby lessening the corresponding responsibility to reduce emissions by reducing commuting with local housing.</p>	<p>In <del>2005</del> <b>2010</b>, St. Helena's estimated per capita GHG emissions were 1.77 metric tons of CO<sub>2</sub>e, and totaled five percent of Napa County's total CO<sub>2</sub>e emissions. This figure is higher than any other residential <del>per capita emissions in the County, and also higher than the County average of 1.46 metric tons.</del> In the County, St. Helena residential emissions account for the highest proportion of greenhouse gases per household, and industrial and commercial emissions <del>account represent the highest proportion per job.</del> <b>While commercial and industrial sources represented the greatest share of community-wide emissions in 2010, emissions from these sources decreased 7 percent between 2005 and 2010. On the other hand, transportation emissions, which accounted for the second largest source of emissions in 2010, increased 36 percent. Emissions from residential buildings, off-road vehicles and equipment, agricultural operations, and waste disposal all decreased between 2005 and 2010. These reductions, however, were only enough to compensate for the significant rise in transportation emissions.</b></p>
	<p><del>A 2006 Bay Area Air Quality Management District (BAAQMD) report indicated that approximately</del> <b>Approximately 29 percent of community-wide emissions in St. Helena result from on-road vehicles.</b> 55 percent of GHG emissions in Napa County resulted from mobile source emissions.</p>
<p>15% is confirmed again. What does it mean to qualify a goal with language that "such a goal is economically feasible and an appropriate use of City resources"? Shouldn't we be stating that we will strive to meet the GHG reduction goal in conformity with California State policy?</p>	<p><b>The City has adopted a goal to reduce community-wide emissions by 15 percent below 2005 levels by the year 2020, provided that attainment of such a goal is economically feasible and an appropriate use of City resources.</b></p>
<p>Removal of Land Use diminishes the relationship between location of housing and transit and mobility in order to make it easier to locate affordable housing in more remote parts of the city.</p>	<p>TOPIC AREA 1 - TRANSPORTATION, <b>and</b> MOBILITY <del>AND LAND-USE</del></p>

## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	CLIMATE CHANGE CHANGES
<p>Paradox: Urban centered growth is removed but walkable, etc. is left in. Unless people live near the city center, they cannot walk to shops, services and food sources.</p> <p>Again, removal of any mention that housing needs to be near jobs and also any mention that rents may need to be controlled to maintain viability for the lower and middle income people here.</p>	<p>CC1.1  <del>Promote the City's commitment to urban-centered growth, adopting zoning and design standards to develop mixed-use, "walkable" and "bikeable" neighborhoods. [Draft Napa Countywide Community Climate Action Plan Framework, Action T1]</del></p> <p>CC1.2  <del>Promote land use decisions that support the County's goals to maintain and improve the County's overall balance of jobs and housing, by locating jobs and housing in proximity to each other and improving the match between wages and housing cost. [Draft Napa Countywide Community Climate Action Plan Framework, Action T2]</del></p>



## 2013 GENERAL PLAN CHANGE CATEGORIES

PUBLIC / PRIVATE IMPACT	PARKS AND REC CHANGES
<p>This issue is thoroughly covered in 16.28.040 of the Municipal Code. There is likely a legal issue as to whether a city can extract a parkland dedication from a developer if the development is below a certain size (in acres).</p> <p>This is designed to increase the cost of developing affordable housing which is difficult to pencil out anyway in high value areas, thereby discouraging housing projects.</p>	<p>PR5.B Require the dedication of land <del>and/or payment of Civic Improvement Fees</del> to be used for parks and recreation purposes as a condition of approval for new <b>residential</b> development.</p>