

CHRISTIAN VALLEY PARK, CSD

Placer County | P.O. Box 6857, Auburn California 95604 | (530) 878-8050

BOARD OF DIRECTORS

RESOLUTION NO. 2026-06

A RESOLUTION OF THE BOARD OF DIRECTORS OF THE CHRISTIAN VALLEY PARK COMMUNITY SERVICES DISTRICT AUTHORIZING SUBMISSION OF A FORMAL OBJECTION AND NOTICE TO PLACER COUNTY REGARDING WATER SUPPLY LIMITATIONS, INFRASTRUCTURE CONSTRAINTS, HEALTH AND SAFETY, AND PROPOSED ZONING TEXT AMENDMENTS / ADU POLICY UPDATES

WHEREAS, the Christian Valley Park Community Services District (“District”) is a California special district providing potable water service to approximately 632 customers, including the California Conservation Corps facility;

WHEREAS, the District is an unincorporated potable water enterprise with limited system capacity, and based on current conditions the District has only a limited number of additional service opportunities remaining before capacity is exhausted;

WHEREAS, the District’s water system includes transmission lines of varying ages, including portions approximately 63 years old and other annexed portions (referenced as the Gayle Loop) is approximately 13 years old, and the system was historically expanded in response to annexation from a drought-prone area wherein wells had failed;

WHEREAS, Placer County has stated that it is updating (ZTA) Zoning Text Amendments in

particular concern, regarding its accessory dwelling unit (“ADU”) regulations to conform with State law and has proposed increasing the number of ADUs allowed on single-family parcels to a maximum of four;^[1]

WHEREAS, California law and HCD guidance recognize that ADU implementation may be based on the adequacy of water and sewer services and public safety, and that local agencies should consult with the applicable water or (septic / sewer) provider(s) regarding adequacy before designating areas where ADUs may be permitted;

WHEREAS, the District has determined that its wells and potable water facilities are not adequate nor stable enough to support assumptions of multiple ADUs per parcel, and that approvals based on density assumptions exceeding actual water availability create direct public health and safety concerns;

WHEREAS, the District further believes that longstanding agricultural and rural one-acre minimum covenants (CC&R) and development expectations should not be disregarded or effectively nullified by zoning amendments or housing implementation measures;

NOW, THEREFORE, BE IT RESOLVED by the Board of Directors of the Christian Valley Park Community Services District as follows:

1. The Board hereby approves the formal objection and notice attached hereto as **Exhibit A** and authorizes its submission to Placer County.
2. The Board finds that the District’s potable water system lacks surplus capacity to support density increases beyond existing service commitments, except for a limited number of undeveloped parcels already physically positioned on annually paid fee for

standby for those reserved connections, without system expansion.

3. The Board finds that approvals assuming more than one ADU per parcel within the District's service area may create adverse impacts on potable water reliability, existing customer service, and public health and safety.
4. The Board directs District staff to transmit the objection and this Resolution to the Placer County Planning Commission, the Placer County Board of Supervisors, the Planning Director, Planning Department staff, and the Clerk(s) of the Board.
5. The Board directs that this Resolution and the attached objection be placed in the administrative record for all related hearings and staff reports.
6. The Board authorizes the Board President, Vice President, Secretary, or designated District representative to make non-substantive revisions to the transmittal package as may be necessary to conform formatting, correct clerical errors, and ensure proper service.
7. This Resolution shall take effect immediately upon adoption.

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EXHIBIT A

FORMAL OBJECTION AND NOTICE

RE: FORMAL OBJECTION AND NOTICE OF INSUFFICIENT WATER SUPPLY, INFRASTRUCTURE CAPACITY, AND HEALTH AND SAFETY CONSTRAINTS REGARDING PROPOSED ZONING TEXT AMENDMENTS AND ADU-RELATED LAND USE APPROVALS

The Board of Directors of the Christian Valley Park Community Services District hereby submits this formal objection and notice for inclusion in the administrative record concerning any proposed zoning text amendments, housing-related code amendments, accessory dwelling unit (“ADU”) policy updates, rezonings, or discretionary approvals affecting parcels within or served by the District.

Placer County has stated that it is revising its ADU ordinance to conform to State law and that the proposed update would increase the number of ADUs allowed on single-family parcels to a maximum of four. The District objects to any County action that would proceed on an assumption that the District can safely and reliably provide potable water service to multiple additional dwelling units on each parcel within its service area when the District’s actual system conditions do not support that assumption.

The District is an unincorporated potable water enterprise serving approximately 632 customers, including the (CCC) California Conservation Corps facility. The District affirms the community’s right to access water and the District’s obligation to serve existing customers

lawfully and reliably. However, the District's current system capacity is limited to existing parcels already connected to service, plus a limited number of undeveloped parcels that already contain service boxes and may be served without system expansion. Approximately 65 additional service opportunities may remain before capacity is exhausted.

The District further objects to any approval that assumes the District can reliably support multiple ADUs per parcel, including the maximum density now contemplated under County ADU policy, where that assumption exceeds actual potable water availability and operational reliability. HCD guidance states that ADU area designations may be based on the adequacy of water and sewer services and public safety, and that a local agency that does not provide water or sewer services shall consult with the local provider regarding adequacy before designating an area where ADUs may be permitted. The District therefore objects to any action that ignores, minimizes, or bypasses those infrastructure constraints.

The District also places the County on notice that its wells in Christian Valley Park, CSD's sphere of influence have demonstrated that they are not stable enough to support the level of expansion that would result from approvals anticipating up to four ADUs per parcel. While State law may constrain local denial authority, nothing in State law authorizes approvals that are incompatible with actual utility capacity, service reliability, or public health and safety. As of this point in time, the District's transmission infrastructure includes components approximately 63 years old, with the youngest major components approximately 13 years old, and the system was expanded in response to annexation from a drought-prone area where wells failed. These facts materially affect reliability, emergency response, long-term serviceability, and the District's duty to protect existing customers.

The District further notes that its longstanding agricultural and rural one-acre minimum

covenants (CC&Rs) and land-use expectations should not be disregarded merely because the County is updating its zoning text to track evolving State mandates. The District requests that these covenants, historic rural development patterns, and existing service limitations be expressly acknowledged in the administrative record and considered in any policy or entitlement decision.

HEALTH AND SAFETY

The District's objection is also grounded in health and safety concerns. Overextension of a limited potable water system can impair water reliability, complicate emergency response, and undermine the District's ability to serve existing homes and institutional users. The District's wells and transmission system were not designed for uncontrolled density intensification, and any increase in dwelling units that exceeds actual supply can create foreseeable risks to drinking water reliability and service continuity. HCD's ADU materials expressly recognize public safety and utility adequacy as relevant considerations in local ADU implementation.

Accordingly, the District requests that the County of Placer:

1. Consider the District's documented potable water limitations before approving any zoning text amendments or housing-related policies affecting density within the District's service area.
2. Avoid all approvals that would presume more than one ADU per parcel in areas served by the District unless and until a specific showing is made that the parcel can be served without jeopardizing existing customers or system reliability.
3. Require meaningful consultation with the District before approving any project,

rezoning, or policy that could materially increase water demand within the District's service area.

4. Preserve existing rural/agricultural land-use expectations and covenants (CC&R) to the fullest extent allowed by law.
5. Recognize that infrastructure adequacy and public health and safety must be part of any lawful and responsible land use decision.

This objection is made in good faith, based on the District's actual operating conditions, and is intended to preserve the District's rights, the rights of its customers, and the public health and safety interests implicated by overtaxing a constrained potable water system.

OPTIONAL LEGAL AUTHORITY

This objection is supported by Government Code section 65852.2, which recognizes that local ADU implementation may be based on the adequacy of water and septic / sewer services and public safety, and HCD's guidance explaining that a local agency that does not provide water or sewer services shall consult with the local provider regarding adequacy before designating an area where ADUs may be permitted. Placer County's own ADU update materials confirm that the County is proposing ordinance changes to align with State law and increase the number of ADUs allowed on single-family parcels to a maximum of four.

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TRANSMITTAL LETTER

Date: _____, 2026

VIA EMAIL AND U.S. MAIL

- ☐ Placer County Planning Commission
- ☐ Placer County Board of Supervisors
- ☐ Placer County Planning Director
- ☐ Planning Department Staff
- ☐ Clerk(s) of the Board of Supervisors

Placer County Planning Commission

Commissioners:

- ☐ Robyn Dahlgren (District 1) – rdahlgren@placer.ca.gov
- ☐ George Alves (District 2) – galves@placer.ca.gov
- ☐ Trent Jewell (District 3) – tjewell@placer.ca.gov
- ☐ Amber Beckler (District 4) – abeckler@placer.ca.gov
- ☐ Jeff Ronten (District 5) – jronten@placer.ca.gov
- ☐ Mark Watts (At-Large East) – mwatts@placer.ca.gov
- ☐ Richard Johnson (At-Large West) – rjohnson@placer.ca.gov

Commission Clerk:

- ☐ Email: planningcommissionclerk@placer.ca.gov
- Phone: 530-745-3000 (General Planning Dept line)

Address: 3091 County Center Drive, Auburn, CA 95603

Placer County Board of Supervisors

- ☐ District 1: Bonnie Gore – bgore@placer.ca.gov
- ☐ District 2: Shanti Landon – slandon@placer.ca.gov
- ☐ District 3: Anthony M. DeMattei – ademattei@placer.ca.gov
- ☐ District 4: Suzanne Jones – sjones@placer.ca.gov
- ☐ District 5: Cindy Gustafson – cgustafson@placer.ca.gov

General Contact:

- Phone: 530-889-4010 : Toll-Free: 800-488-4308 : Fax: 530-889-4009
- General Email: boardofsupervisors@placer.ca.gov
- Address: 175 Fulweiler Avenue, Auburn, CA 95603

Planning Department Leadership

☐ Planning Director: Christopher Pahule

- Phone: 530-745-3147
- Email: (Specific direct email not listed publicly, but general department contact is below)

Planning Department General Contact: Phone: 530-745-3000

- Fax: 530-745-3120
- Email: (Inquiries often routed through the department or specific division emails; general correspondence can be sent to the address below)

Address (**Community Development Resource Agency – Planning**):

3091 County Center Drive Auburn, CA 95603

Clerk of the Board of Supervisors

(Handles public comment, agenda requests, and official records for the Board.)

☐ Clerk:: Megan Wood

Phone: 530-889-4020 Fax: 530-889-4099

Email: (Public comments often sent to boardofsupervisors@placer.ca.gov or via the Clerk's office)

Address: 175 Fulweiler Avenue, Auburn, CA 95603

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RE: Transmittal of Resolution No. ____-2026 and Formal Objection Regarding Zoning Text Amendments, ADU Policy Updates, Water Capacity, and Public Health and Safety

Dear Commissioners, Supervisors, Director, Staff, and Clerk(s):

Enclosed please find Resolution No. _____-2026 adopted by the Board of Directors of the Christian Valley Park Community Services District, together with the District's formal objection and notice regarding water capacity, infrastructure constraints, and health and safety concerns associated with proposed zoning text amendments and ADU-related approvals.

The District requests that this correspondence and enclosure be placed in the administrative record for all related hearings, staff reports, and Board or Commission actions. The District further requests that the County consider the District's actual service limitations before taking any action that would assume the availability of potable water service for density beyond what the District can safely and reliably provide.

The District appreciates the County's attention to this matter and requests written acknowledgment of receipt.

Respectfully submitted,

By: Don Elias, CVPCSD General Manager / Secretary

Enclosures:

1. Resolution No. _____-2026
2. Exhibit A – Formal Objection and Notice
3. Proof of Service(s)

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ADOPTION / SIGNATURE PAGE : RESOLUTION NO. 2026-06

The foregoing Resolution No. _____-2026 was duly adopted by the Board of Directors of the Christian Park Community Services District at a regular meeting held on _____, 2026, by the following vote:

AYES: _____ NOES: _____
ABSENT: _____ ABSTAIN: _____

DIRECTORS

1.) Director Name: CVPCSD President: Greg Bala

Signature: _____
Date: _____

2.) Director Name: Vice President Director Jo Anne Carmona

Signature: _____
Date: _____

3.) Director Name: Dan Negus

Signature: _____
Date: _____

4.) Director Name: Diane-Louise:Alessi

Signature: _____

Date: _____

5.) Director Name: Director Reed Koeber_____

Signature: _____

Date: _____

ATTESTED By: _____

Don Elias, Secretary, Christian Valley Park Community Services District:

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COMPANION SERVICE OF PROCESS LIST

SERVICE LIST FOR TRANSMITTAL OF RESOLUTION NO. _____-2026

Christian Park Community Services District directs service of the enclosed Resolution, Exhibit A, and Transmittal Letter to the following:

1. ☐ Placer County Planning Commission.
2. ☐ Placer County Board of Supervisors.
3. ☐ Placer County Planning Director.
4. ☐ Placer County Planning Department Staff.
5. ☐ Clerk(s) of the Board of Supervisors.
6. ☐ County Counsel, if desired.
7. ☐ District administrative file.

METHOD OF SERVICEABILITYService may be made by:

8. ☐ Email.
9. ☐ U.S. Mail.
10. ☐ Hand delivery, if desired.
11. CERTIFICATE OF SERVICEABILITYI declare that on _____, 2026, I served true and correct copies of the foregoing Resolution No. _____-2026, Exhibit A,

Transmittal Letter, and Companion Service List on the parties listed above by the method(s) indicated.

Name: _____

Title: _____

Date: _____ **2026**

Research Sources:

1. <https://www.placer.ca.gov/10855/Updates-to-ADU-Regulations>
2. <https://www.hcd.ca.gov/policy-research/docs/ordinance-review-letters/pittsburgaduordinance122221.pdf>
3. <https://www.oaklandca.gov/files/assets/city/v/1/housing-comm-dev/documents/homeowners/adulp/adu-handbook-hcd-july-2022.pdf>
4. <https://burlingameca.legistar.com/View.ashx?M=F&ID=6446939&GUID=FEAE7394-F5F7-403E-AF87-4F3987CEF72E>
5. <https://www.placer.ca.gov/7571/Building-Accessory-Homes-in-Tahoe>
6. <https://www.placer.ca.gov/7394/Goals-Policies-and-Programs>
7. <https://www.hcd.ca.gov/policy-research/docs/california-coastal-commission-adu-follow-up-guidance-memo.pdf>
8. <https://www.uplandca.gov/Documents/Permits and Licenses/Building and Safety Forms/ADU Process Information Combined.pdf?t=202603101539460>

9. <https://www.placer.ca.gov/DocumentCenter/View/45010/2020-060920-PowerPoint---Item-7A-CDRA-Accessory-Dwelling-Units---Zoning-Text-Amendment>
10. <https://www.hcd.ca.gov/building-standards/adu>