

SECTION 2.3 - LAND USE AND PLANNING

I. EXISTING SETTING/BASELINE FOR LAND USE

“The general plan must be based on solid data if it is to serve as the primary source of community planning policy.”

“When preparing or revising a general plan, planners need an accurate picture of the existing land uses in the planning area.” (2003 General Plan Guidelines p.36)



“Fire, post-fire removal of dead trees and marijuana have dramatically changed the landscape in central Calaveras County. From the air, it is vividly clear that much of the shady forest is gone, replaced by a patchwork of marijuana farms, graveyards of burned snags from last year’s Butte Fire, and swaths of land clearcut to protect roads and utility lines... Meanwhile, a new type of agriculture is displacing the timber and beef production that once dominated here.”—Calaveras Enterprise, April 21, 2016, ‘Makeover by fire, marijuana - Central Calaveras County gets a new landscape’

Existing physical conditions and land uses in Calaveras County have changed significantly in recent years, and need to be updated and identified for the existing environmental setting and baseline for the EIR. The following recent major land use changes are **not reflected** in the Technical Background Report or in the General Plan Update or Land Use Element:

- Rapid and extensive growth of commercial cannabis farms
- Large areas of forest, vegetation/ watershed, and homes destroyed by the Butte Fire
- Severe tree mortality from beetle infestations and drought.

Cannabis farms. There have always been cannabis grows in Calaveras County, but in recent years the number of farms has increased dramatically. Thousands of new, registered and unregistered, commercial farms have been developed, especially in 2016, and mostly in areas affected by the 2015 Butte Fire. The number of cannabis farms has been reported to be in the thousands, “There are now at least 1500 growers in the county” (Planning Staff Report to Board

of Supervisors, January 31, 2017). Impacts to the local economy, jobs, and population shifts have been significant. Reportedly, direct cannabis industry employment in 2016 was 2,605 jobs and there was over \$251 million in sales (see attached ‘Economic Impact Assessment of the Cannabis Cultivation Industry in Calaveras County’, February 2, 2017). Negative impacts to public services have been tremendous, as cannabis registration processing, farm inspections, and enforcement/abatement has overwhelmed staffing for the Sheriff Department, the Planning Department, and Code Enforcement. The Planning Department has a list of cannabis registrants with acreage and locations, the majority of which are in the Butte Fire area and District 2. Aerial mapping has been completed countywide, showing where both registered and unregistered cannabis farms are located. **The number, acreage, and location of existing cannabis farms in the county should be identified in the EIR.**

2015 Butte Fire. This 71,000-acre fire destroyed human lives, housing (888 structures), forests, and watersheds of the Mokelumne and Calaveras rivers. The fire also damaged roads, utilities, and other infrastructure. Many new cannabis farms moved into the Butte fire burn area; many long-time residents left the burn area. Neighborhoods have changed. **The impacts to the county from the Butte Fire should be thoroughly identified and quantified.**

Tree mortality. Climate change, drought, and beetle infestations have caused widespread tree mortality in the Sierra Nevada, moving over the last few years into Calaveras County. Especially hard-hit are pine trees in specific elevation ranges. Estimates are of nearly 700,000 dead trees in Calaveras. **The County’s new aerial imaging and GIS mapping systems have the capacity and should be used to analyze and quantify acreage and numbers of impacted trees.**

There have been many impacts to the human environment from the above three major land use and environmental changes, including impacts to agriculture, timber production, aesthetics, community character, roads and traffic, water supplies and water quality, forests, quality of life, conflicts from incompatible uses, recreation, public safety, fire hazards, population shifts, new seasonal labor demands, loss of housing, increased need for farm worker housing, and much more. **Cannabis cultivation, Butte Fire, and tree mortality land use issues and changes need to be examined, quantified, included in the baseline for the existing environmental setting, and analyzed in the GPU and EIR.**

II. IMPACTS & MITIGATION RELATED TO LAND USE.

A) GENERAL PLAN UPDATE INTRODUCTION Vision & Guiding Principles, as Related to Land Use

The current draft Vision and Guiding Principles in the General Plan Introduction (pgs INT 1, 2) were edited by the Planning Commission, and do not adequately reflect the community’s vision. The principles do not aim to protect open space, and do not reflect a balance between property rights and the public interest and natural environment. The emphasis is on protection of *private property rights*, to the exclusion of open space, scenic vistas, wildlife habitat, and the natural environment. In the edited principles, natural resources are only to be protected from “hazards.” If resources are valuable, the “County government will respect and protect the property rights of people in their efforts to maintain or develop productive resources.” Open space and wildlife habitat will only be “maintained” “by those who own, operate, or manage them”, if they have “continued ability.”

Where are our guiding principles for the protection of the public interest, open space, and the natural environment? The Planning Commission removed the following principle, gathered from many citizen workshops and suggested by the planning department: *“Open space, wildlife habitat, scenic vistas, agricultural lands, forests, rivers, and lakes will be protected and maintained for wildlife habitat, productive grazing and agricultural lands, and recreation.”*

In accordance with its revised Vision and Guiding Principles, the Planning Commission edited the General Plan policy document and Land Use Element, weakening goals and policies protecting and maintaining open space and natural resources and directing growth to existing communities (see comments under Land Use Element Impacts & Mitigations). **Deficiencies in protection language in the Vision and Principles are reflected in similar deficiencies in the General Plan and in its Land Use Element—lack of protection of the public interest, open space and natural resources. Please evaluate the impacts of deficient Guiding Principles and the ensuing policies.**

B) LAND USE ELEMENT



“At its best, the land use element will reflect the community’s vision and promote thoughtful, equitable, and accessible distribution of different land uses, including residential, commercial, industrial, agricultural, and open space, as well as alignment with other general plan elements.”
(2015 Draft General Plan Guidelines)

1) BUILDOUT PROJECTIONS

Current ‘Residential Buildout Projections’ in the January 18, 2017, EIR Notice of Preparation have increased significantly from buildout projections in the current proposed GPU Land Use Element. We understand the statistics were updated based on the revised September 2016 General Plan Land Use Map. The November, 2015, Land Use Element section on Land Availability stated, “a more likely buildout scenario is approximately **23,000 new units**. At the current census rate of 2.41 persons per household, this could accommodate over **56,000 new residents**” (pg LU3).

Buildout projections are now shown in the NOP at 27, 391 new units and 65, 949 new residents (Tables 2 and 3). This is a nearly 20% increase in projected new units and population from 2015 to 2017. Is the new unit and population increase due to the more than 5,000 acres of increased density and development potential the planning commission allowed during land use map change request hearing in September, 2016? If so, where in Calaveras County did these increases occur? In the DEIR, please explain the reason and the location of the recent 20% increases in new units and population.

California Department of Finance is projecting only 4,353 new units and 9,963 new residents for the same planning period. **Current projections of 27,391 new units and 65,949 new residents are more than six times what the DOF projects Calaveras County will need.** There is already an oversupply of undeveloped 5-acre and other small parcels. Allowing and planning for excessive residential growth, especially Low Density and Rural Residential (land uses in Table 1 with the highest projected populations), could have significant negative impacts on our rural character, aesthetics, open space, circulation planning, infrastructure costs, and public services.

- **Please identify a more Moderate Growth Alternative in the EIR.**

2) LAND USE DESIGNATIONS & MAP

Resource Production. From Table LU-1, General Plan Land Use Designations, the description of Resource Production (RP) land uses includes:

“This designation identifies those lands capable of and primarily used for agricultural operations, timber production and/or mineral resource production... **Resource Production Lands have the capability of being utilized for several resource production uses and/or compatible activities. The County’s zoning code would allow for these multiple uses.**”

- **Please evaluate the impacts of all allowable land uses in the Resource Production (RP) land use designation, and the affects on open space in Calaveras County.**

New Future Specific Plan Designation. A new category under Mixed Use Lands is the land use designation, Future Specific Plan (FSP). This was added to the GPU Land Use Map and Land Use Designation Table in September, 2016, for two proposed project areas. The ‘Population Density’ for FSP is “As determined by site designation*” and

“*See below for details of density and intensity of use.” Building Intensity is marked “n/a” and is not specified.

* Maximum Density and Intensity of Development for FSP, Future Specific Plan Designated Areas:

1. APNs 054-006-030, 054-006-031, 054-006-037, 054-007-003 and 054-007-019 – 580 total residential and lodging units.
2. APNs 064-029-049, 064-029-050, 064-029-052, 064-029-053 and 064-029-073 – 900 single family residential units, 550 fractional ownership/vacation units, 350 lodging units, 100-space RV park, and 70,000 square feet of commercial space.

The two new FSP Designated Areas total approximately 1,200 acres in the Copperopolis area, and include Sawmill Lake/ creek, and Table Top Mountain. These two FSP land areas are currently undeveloped, Zoned A1, and include critical habitat areas with threatened species, wetlands, steep slopes, and important viewsheds for the Lake Tulloch area. The potential intensity of development looks to be very high. *Doesn't the level of intensity of use need to be specified and located on these sensitive parcels in order to be able to evaluate the impacts of FSP developments on the existing setting, open space, wildlife habitat, and cumulative and regional impacts?* There is nothing in the FSP parameters that calls out building densities, on what portion of the parcels building will occur, or what percentage of the parcels buildings will occupy. ***There is nothing to preserve any percentage of open space, to protect critical habitat, and nothing to protect Lake Tulloch viewsheds.***

- **We request that the above concerns be evaluated and appropriate mitigations included for these FSP areas. For the FSP designation, we suggest identifying and specifying that critical habitat and important viewsheds will be avoided and preserved, and specifying the percentage of open space to be protected (suggest 50% min.).**

3) LAND USE ELEMENT TEXT IMPACTS & MITIGATIONS

"Some of the draft policies were of guiding and directing growth towards existing communities, and while the community still feels development in communities is appropriate, the policies were modified somewhat to allow more development outside of those areas," Maurer said. ('Planners OK general plan's land-use element', Calaveras Enterprise, November 10, 2015).

- **Please read the following comments on the Land Use Element, and address these concerns in the General Plan Update EIR. We have provided suggestions that may help remedy some areas of concern.**

a. Goals, Policies, Programs Weakened or Eliminated; Need for Improvement

During its review in 2015, the Planning Commission edited and weakened goals and policies in the Planning Department's draft Land Use Element intended to create land use patterns and protections for open space, natural, scenic, and historic resources, and that directed growth to existing communities. Examples of these detrimental edits are given below. We have provided suggestions to remedy.

Goal LU-2, originally drafted by the Planning Department under Land Use Patterns as, “A land use pattern that ***maintains the open character of Calaveras County, sustain its natural resources, recognizes the physical constraints of the land and the availability of infrastructure and public services, and ensures the long-term viability of resource-based industries***” was changed by the Planning Commission. Goal LU-2 now reads: “A land use pattern that ***allows those who own, operate, or manage the productive resources in the county, to maintain open space, wildlife habitat, agricultural lands, mineral resources and forests.***” This change weakens the original Goal’s intention to protect and maintain county open space and natural resources, to protect current landowners from incompatible development, and to have land use patterns that direct growth to community centers with services.

- **PLEASE PUT THE ORIGINAL GOAL LU-2 BACK IN; ADD GOAL FROM THE EXISTING CALAVERAS COUNTY GENERAL PLAN**

“A land use pattern that maintains the open character of Calaveras County, sustain its natural resources, recognizes the physical constraints of the land and the availability of infrastructure and public services, and ensures the long-term viability of resource-based industries”

“Goal II-3: Preserve and manage those lands identified as Natural Resource Lands for the future good of the general public.”

A Policy was then added by the commission that further weakened Goal LU-2 (LU 2.1, see below). Other Policies and Programs intended to implement the original goal were moved or eliminated (LU 1.2 and 1.12 below).

Policy LU 2.1 was added, “*Respect and protect the property rights of people in their efforts to maintain or develop productive resources.*” **This policy does little or nothing to maintain and protect open space and natural resources in Calaveras County. This policy also does nothing to protect the property rights of current landowners from incompatible development in surrounding areas.**

Policy LU 1.2 “***Direct growth to existing communities...***”, originally under Goal LU-2, was **moved** to Goal LU-1 and changed to “***Support growth in and around existing communities while protecting and enhancing community and neighborhood character***”. “Support” weakens the intention to direct growth; “in and around” existing communities makes the intention too vague to interpret or implement.

Policy LU 2.2, “Maintain availability of the Williamson Act contracts...” is the only other policy for Goal LU-2 (a land use pattern to maintain open character and sustain natural resources)., and the only implementation is “update the zoning ordinance.” Williamson Act contracts are voluntary, and are not permanent protections for natural resource lands.

- **PLEASE PUT THE ORIGINAL POLICY LU 1.2 BACK IN, AND MOVE IT BACK TO GOAL LU-2**

“Direct growth to existing communities while protecting and enhancing community and neighborhood character”

There is also no implementation program listed under LU 1.2, although Measure LU-2E (originally LU-1F) ‘Innovative Techniques’ says “Implements Policy LU 1.2.” But the program “Innovative Techniques”, originally “Adopt standards for the application of clustered development, transfer of development rights (TDRs), or other innovative techniques that may

minimize development impacts on resource production or other sensitive lands” was also weakened by the Planning Commission. TDRs were eliminated, and the commission would not accept suggestions to include conservation easements, calling them “a destruction of development rights.” **Measure LU-2E provides no implementation to support growth in existing communities, provides no permanent protection for resource lands, and does not clarify interpretation of “in and around” existing communities.**

- **PLEASE ADD PROGRAMS & MITIGATION MEASURES FOR POLICY LU 1.2 THAT EFFECTIVELY DIRECT GROWTH TO (NOT AROUND) EXISTING COMMUNITIES, AND THAT MAINTAIN OPEN SPACE AND NATURAL RESOURCE LANDS**

Policy LU 1.12 ELIMINATED. “Community Areas shall not be expanded unless a finding is made by the Board of Supervisors that additional land area is necessary to accommodate growth in the County” was eliminated by the Planning Commission, as “a barrier to growth”, deleting any restrictions on expanding Community Areas. Of course, that was the point of LU 1.12—to discourage growth outside of community centers. With no policy or program to guide community areas and growth, there is no barrier to endless expansion of Community Areas. This is growth-inducing.

- **PLEASE PUT THE ORIGINAL POLICY LU 1.12 BACK IN, AND INCLUDE BUILDOUT CRITERIA TO DETERMINE WHEN DEVELOPMENT WOULD BE ALLOWED OUTSIDE COMMUNITY AREAS**

“Community Areas shall not be expanded unless a finding is made by the Board of Supervisors that additional land area is necessary to accommodate growth in the County.”

Buildout Criteria and a “finding” for expansion could be: *“The community area is 75% built out, the proposed expansion is contiguous and forms a logical boundary; the proposal is accompanied by a specific project application that is consistent with Community policies, public water and wastewater are available and adequate.”*

Policy LU 3.4 could actually encourage growth outside of community centers by encouraging infrastructure outside of existing communities: “Infrastructure such as water and sewer and high capacity roads **shall be encouraged** within existing developed areas, **areas contiguous to existing communities, areas where future development is anticipated** by the General Plan as reflected in the General Plan land use map, existing, non-contiguous communities, and/or where essential to public health and safety.” The original wording (originally Policy LU 2.4) was “shall not be extended unless...” but this was changed by the Planning Commission.

- **PLEASE PUT THE ORIGINAL POLICY WORDING BACK IN**
“Infrastructure such as water and sewer and high capacity roads shall not be extended outside existing developed areas unless those areas are contiguous to existing communities, are in areas where future development is anticipated by the General Plan as reflected in the General Plan land use designation, to serve existing, non-contiguous communities, or are essential to public health and safety”

Programs LU-3C and LU-3I ELIMINATED. Two Programs **recommended by the Planning Department to implement Community Character & Design policy were eliminated by the Planning Commission.** These program measures were intended to implement Policy LU 4.1

“New development shall be designed to be compatible with the natural, scenic, and historic resources of Calaveras County.”

Measures eliminated:

LU-3C Hillside Development

Draft Adopt a hillside management ordinance establishing acceptable hillside slope-related densities and alternatives for hillside construction standards that reduce grading and extreme physical alterations to topography.

LU-3I Historic Design Standards

Adopt historic design standards, or utilize existing standards or guidelines, to implement the Historic Community/Historic Mixed Use land use designation and zoning. Standards shall be unique to individual communities to recognize the architectural character of that community.

With the elimination of these programs, new development will have no construction or design standards in place to ensure compatibility with natural, scenic, and historic resources, to protect hillsides from extreme grading, densities, and alterations to natural topography, or to ensure new construction is compatible in Historic Community Centers.

- **PLEASE PUT HILLSIDE DEVELOPMENT (LU-3C) AND HISTORIC DESIGN STANDARDS (LU-3I) MEASURES BACK IN (SEE ABOVE)**

We cannot find enough effective Goals, Policies, Programs or Mitigation Measures in the Land Use Element to adequately guide the general pattern of development in Calaveras County, to protect and maintain open space, agricultural lands, natural resources, community character, and to direct growth towards community centers and away from natural constraints. Without adequate protection and direction, future growth and development will likely occur outside existing community centers, converting rangeland, and negatively impacting open space, wildlife habitat, forests, scenic, historic, natural resources, and public services; and increasing the costs of infrastructure borne by current and future residents.

- **PLEASE ADD FEASIBLE POLICIES AND MITIGATION MEASURES IN THE LAND USE ELEMENT TO REDUCE IMPACTS OF DEVELOPMENT. SOME SUGGESTIONS ARE IN PART C BELOW**

b. Implementation Programs—No Timeframes, Deadlines, or Funding

Other than two ‘General Measures’, there are **no timeframes or deadlines in any Land Use Implementation Program Mitigation Measures, and no funding sources for implementation.** During the planning commission’s draft GPU review and editing, there were opinions expressed that “deadlines were to be avoided” so as not to trigger legal challenges. This is an unnecessary concern, as mitigation measure deadlines can be changed as needed under General Measure ‘Annual Work Plan’ review and periodic ‘General Plan Review.’

Without timeframes for Mitigation Measures or funding sources, there is no clear path forward, no motivation for implementation of mitigations, and no clear way to create a priority list. Implementation Programs need timeframes, funding, and mitigation deadlines to prioritize programs and actually mitigate impacts of the General Plan.

- **PLEASE EVALUATE ALL LAND USE IMPLEMENTATION PROGRAMS AND MITIGATIONS IN THE EIR AND ENSURE THERE ARE CLEAR GUIDELINES, RESPONSIBLE PARTIES, SPECIFIED TIMEFRAMES, AND POTENTIAL FUNDING SOURCES**

c. Additional Policies and Mitigation Measures to Reduce Impacts of Development

Suggested Policies and Programs to Add to the General Plan Update:

- Maintain parcel sizes outside of community growth boundaries large enough to sustain viable agriculture and discourage conversion to non-agricultural home sites
- Prohibit division of agricultural land for non-agricultural uses
- Require that the subdivision of agricultural lands shall only be allowed upon demonstration that long-term productivity on each parcel created would be enhanced as a result of the subdivision.
- Urban growth boundaries around county unincorporated communities with findings required for expansion.
- Clustering programs to preserve the best farmland, rangeland, and forestland, with conservation easements required on remainders, and 2:1 mitigation for all unavoidable conversions.
- Create and adopt an agricultural land and forestland conversion mitigation program and ordinance. Require compensation for loss of agricultural lands, including farm and rangeland, and forest lands. Establish appropriate mitigation ratios for the program or utilize a graduated mitigation mechanism. The mitigation ratio shall be a minimum of at least 2:1 (2 acres of farmland/rangeland/forestland protected through mitigation with land of equivalent value for each acre converted.) The program shall not present regulatory barriers to agritourism, agricultural services, and agricultural processing or uses compatible with timber harvest where such uses are permitted and where they are sited to avoid the best farmland/forestland. The program, where feasible, shall also establish mitigation within the agricultural/forestlands area where the conversion occurs as a preferred strategy. The program shall include a fee option and shall provide an exemption for farmworker housing, again ideally sited off of the best farmland and rangeland.
- Establish a resource mitigation overlay district within the zoning ordinance to encourage site and permit mitigation banks
- Development shall avoid, minimize and mitigate impacts to rare and special status species and critical habitat to the maximum extent feasible. Measures may include, but are not limited to:
 - Clustering lots to avoid habitat areas and wildlife corridors
 - Dedications of permanent conservation easements;
 - Purchase of development rights from willing sellers; and
 - Other appropriate means.

C) COMMUNITY PLAN ELEMENT IMPACTS AND MITIGATION



“This element provides a location for more detailed plans addressing individual communities’ needs.” (GPU pg. INT 6)

“Individual communities make up the backbone of Calaveras County. Each is unique in many ways, but also share similarities with the other communities of the county. The purpose of the Community Plan Element is to identify the unique characteristics of these communities, the vision of its citizens, and provide policies to support and assist development and preservation of their social, economic, environmental, and historic assets.” (GPU pg. CP 1)

We applaud and support the Board of Supervisors decision to include a Community Plan Element in the Calaveras County General Plan Update!

But the element is incomplete and inconsistent:

- 1) Many communities and community plans are excluded**
- 2) There are no implementation programs for community policies**
- 3) An Alternative Community Plan Element should include Valley Springs**

With adoption of the GPU, communities that were *not* included in the Community Plan Element will have *existing community plans rescinded*, and other communities that submitted *draft* community plans to the county will have their *draft community plans excluded*. Exclusion from the General Plan means that individual and unique community needs and characteristics will not be addressed for the following communities: Arnold, Avery, Copperopolis, Ebbetts Pass, Murphys, and Valley Springs.

- **The Community Plan Element should include more Calaveras County communities and community plans, especially Valley Springs.**
- **The Community Plan Element needs Programs to implement its unique community plan policies.**

Please address *inconsistent inclusion* of Calaveras County communities and the *lack of implementation programs* for community policies in the EIR analysis. **We ask for inclusion of implementation programs for all community plan policies, and inclusion of as many community plans as possible. Without these, the plans will not reflect a commitment to mitigate the impacts of future development in these communities.**

- **A General Plan Alternative for the Community Plan Element should clearly include Valley Springs, the largest and fastest-growing area in Calaveras County**

Reasons to include Valley Springs:

1) **Support for inclusion of Valley Springs from the Calaveras County Planning Commission and Board of Supervisors.** On July 14, 2016, the Calaveras County Planning Commission gave direction to try to include the Copperopolis and Valley Springs community plan policy documents in the General Plan Update. On October 4, 2016, Planning Director Maurer told the Board of Supervisors about Commission direction for incorporation prior to EIR completion, and added, “We hope to incorporate Valley Springs and possibly Copper as we go through the [EIR] process”. The Calaveras County Board of Supervisors then motioned & passed the General Plan Project Description for the EIR (see October 4, 2016, Planning Staff Report for “General Plan Project Description” and Director Maurer’s verbal comments on the BOS meeting video for January 26, 2017).

2) **Valley Springs is unique.** Of course, all communities are unique, but Valley Springs stands out from other Calaveras communities due to its unique location, resources and growth pressures. The Valley Springs elevation (658 ft.) is the lowest of all Calaveras communities; its location in the most westerly part of the county is closest to Stockton, Sacramento, and the Bay Area for commuting purposes; there is more level and gently rolling land available attracting new development; lands are more suitable for bicycling and pedestrian use; vistas and viewsheds are more wide-open; there are more creeks with floodplains, farmland, mature heritage oaks and oak woodlands that need protection from development; the two major highways (SR 12 & SR 26) through town have led to more congestion and traffic to manage safely; there is a large population and greater development pressures; and there is a higher demand for sports fields, public parks, and recreational areas. Policies and programs in the Valley Springs Community Plan could address these unique development pressures, impacts and opportunities.

3) **Development pressures in Valley Springs.** There are tremendous development pressures in the Valley Springs area due to its unique location and resources. Project applications are pending for over 1,000 units of residential development (see Valley Springs ‘Residential Projects’ List at <http://www.myvalleysprings.com/projects.html>). New development will negatively impact the local environment without adequate mitigations to address unique local challenges and opportunities. Valley Springs' impacts cannot be adequately addressed in the General Plan Update with only “general” county policies. Provisions in the Valley Springs Community Plan could reduce or mitigate

impacts of development in Valley Springs, through specific community policies addressing Valley Springs historical features, view corridors, open space, conservation subdivision and commercial development design, traffic calming for high use pedestrian areas, community trails, local tourism and recreation, unique natural resources, heritage oak trees, steep hillsides, local riparian corridors and floodplains, crime prevention design strategies, and more (see Policies section in the attached Planning Commission Staff Report for January 26, 2017, “General Plan Update—Community Planning Element Valley Springs Community Plan”).

4) **The Valley Springs Community Plan is ready.** Two completed drafts of the Valley Springs Community Plan were submitted to the County in 2010. These two plans were subsequently combined in the summer of 2016 and submitted to the Planning Department in September as a working draft. This working draft community plan “comparison” document was later revised by the Planning Department and condensed into a draft Valley Springs Section for the Community Planning Element, ready for a public hearing on January 26, 2017 (see the attached Planning Commission Staff Report for January 26, 2017, “General Plan Update—Community Planning Element Valley Springs Community Plan”). Once approved, the draft Valley Springs Community Plan Section of the Community Planning Element will be ready for inclusion in the General Plan Update.