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January 22, 2021

To: Calaveras County Planning Director Peter Maurer

Cc: Calaveras County Planning Commission

From: C. Platt, MyValleySprings.com

Re: Comments on Proposed Zoning Update Map

Planning Director Maurer,

Thank you for the opportunity to review the GIS Zoning Update Map posted online with proposed zoning changes. We understand the zoning map will be coming to the Planning Commission soon, February 11. We have concerns about public accessibility to the GIS map and proposed zoning changes, clarity and understanding of map contents, public knowledge and notice, and concern with some parcel zonings assigned. Please see MyValleySprings.com's initial comments and suggestions below.

Our comments are divided into two parts: 1) General Zoning Map Comments, and 2) Specific Parcel Zoning Comments.

I. Zoning Update Map Comments, General

Comments and questions on the Zoning Update Map in general, including difficulties for the public in accessing, using & understanding the GIS map, layers, and zoning information; lack of public notice.

A. The GIS online map is very difficult to use. The map is not user-friendly or intuitive. Directions provided for accessing zoning map GIS info are helpful, but not enough for the average user to be able to use the map to find existing and proposed zoning on their parcel. A tutorial, or a simpler map is needed. To view zoning changes, first, various layers have to be turned off or on, and then the map zoomed in close. It is difficult to manage the zoom and pan and layers at the same time; the map is slow to respond. The map requires high-speed internet access, a large computer screen to see detail, and computer and map skills to be able to use it (many property owners may not have). Even with a high-speed connection, often the map is exceeding slow to load, pan, zoom, and show layers. In short, *a zoning update map should be provided that is easier to view and to find parcel zoning.*

B. Zoning map information is difficult to find and understand. When a parcel is clicked, a pop-up window appears, then you click to arrow for more pages to find existing and proposed parcel zoning

information. Not only is zoning info hard to find, but what you find can be hard to understand:

1) One parcel can have three different zoning-related lines: “Zoning”, “pzoning”, and “change_zon”. These terms are not explained on the map or in the GIS info. Please explain on the map.

2) Zoning designations are not explained. Most people don’t know what acronyms RR, R1, R2, RA, U, AP, A1, C1, CP, M2, etc. stand for, and the map doesn’t explain or say where to find out. Where can the public find zoning designations defined and explained, to learn the differences between RA and RR zones (for example) and what uses are allowed? There should be clear directions or links provided for the public, leading to the county zoning code, and then specifically to which chapter / section contains zoning definitions and uses explained.

3) Zoning “suffixes” are not explained. Many parcels have a number “suffix” added to the end of the zoning acronym, such as RA-10/RA-5; RR-5/RR-10/RR-40, etc. How do property owners know what these suffixes mean? The map doesn’t say. The County zoning code doesn’t mention or explain. Is “10” a minimum parcel size, parcel density, the number of lots allowed, or a “suggestion” depending on water and sewer? How would a property owner know? *Personally*, I have been told by planning staff that a zoning suffix stands for minimum parcel size, and I have operated on that assumption for years. If true, it is a good way to let property owners know up front about the limitations for development on a parcel. This would help limit attempts at parcelization, and save time and money processing GPA applications. *But I cannot find any suffix definition or “minimum parcel size” definition verified in zoning code or elsewhere in writing.* So, does it really mean this? Different people/agencies seem to have different interpretations of zoning suffixes: CCWD has assigned *numerous* future water/sewer connection units to some parcels in AD604 zoned RR-10 and RR-5. The numbers assigned are *much greater* than a “minimum parcel size” suffix definition would allow. If CCWD doesn’t recognize what the suffixes mean, and they are not defined by the County in writing, do they really mean anything (much less minimum parcel size)? How can a property owner be assured that if he sells his RR-10 property, it won’t be subdivided into 1-acre parcels if public water and sewer are available? Nothing is explained about suffixes on the zoning map or in the zoning code that we can find. If it’s there, please show the public where to find the definition and explanation of a zoning number suffix. If it’s not there, please add a definition and explanation of zoning suffixes.

4) What do “Ag Perservation” [sic] and “Williamson Act” GIS map layers mean? They don’t seem to be zoning layers, as some parcels, in both layers, are zoned A1/ some AP. This is confusing. The two layers sound like they mean the same thing—Williamson Act lands are usually zoned Ag Preserve—but the layers are not the same, as the two layers show different parcels. Evidently there must be a difference between the layers. What is it; what do they mean? Please explain.

C. Lack of Public Notice to property owners about property zoning changes. As of yet, there has been no official Public Notice or notice sent to property owners whose zoning is being changed. There has been one press release, emails sent to subscribers of the Planning Department newsletter,

and notices posted on the County Planning Department web page. The general public and most property owners likely have no knowledge of county webpage updates, or that parcel zoning is being changed. We suggest greater public noticing and outreach to property owners.

II. Specific Parcel Zoning Comments & Questions

(Questions and comments about zoning on specific parcels)

A. RR Parcel Zoning Questions. For some parcels in the west county, the proposed zoning change to RR seems inappropriate, because of the large parcel size and/or the GP Land Use. For the following parcels, we question the “RR” designation, especially *if there is no minimum parcel size suffix*, and suggest either zoning RA or changing to RR-10, as appropriate.

1) APN(s) 460004007, 46004008, 46004009, 046004010

--(4) **9 to 10-acre parcels** (in a square block), adjacent to Hwy. 12 in Burson /VS area, developed (single-family homes)

--GP land use RTA (10-20 acres/lot); previous zoning “R2-10”, **proposed zone “RR.”**

--Surrounding parcels are RTA, RTB and RP, with zonings of RR-10 and A1 and AP.

--Proposed RR zoning seems inconsistent with LUD and surrounding parcels; would allow higher, 1-acre density in the future. **Suggest change zone to RR-10 for consistency with adjacent, similar parcels.**

2) APN 54007024

--**40 acres**, Copperopolis area, developed with one single-family home

--GP land use Copper Community Area Rural Residential; previous zoning “U”, **proposed zone “RR.”**

--Surrounding parcels: RP/AP to east, RTA/RR-10 to north, RR/RA-10 to west, RR/RR-X and –MH to south

--**Suggest change zone to RR-10 or RA-10 for consistency with surrounding parcels, and to avoid potential for 1-acre, higher-density development in the future.**

B. RA “Suffix” Parcel Zoning Questions. Some parcels in the west county show proposed zoning changes from U to RA-5 and RA-10. RA may be appropriate if the parcels are large and the Land Use designation allows, but assigning a “minimum parcel size” suffix of 5 or 10 acres to a large parcel seems to *encourage parcelization* of currently undeveloped large-acreage properties. Does a minimum parcel size *need* to be assigned here for RA? If so, could it be set higher? This is a concern for the following parcels.

1) APN(s) 73043003, 50002007 (adjacent, likely same owner). 108 acres + 282 acres=390 acres total in undeveloped foothill oak woodlands used for cattle grazing. Both parcels are existing U zoning; the proposed zoning change is to RA-10. This zoning suffix would suggest that 39 new parcels could be created from these 390 undeveloped hillside woodland acres. Is that the intent? Perhaps RA-20 would be more appropriate, or perhaps no zoning suffix at all.

2) **APN(s) 50016196, 50016050** (adjacent, likely same owner). 44 acres + 39 acres=83 undeveloped acres in the west county. Existing U zoning, proposed change is to RA-5, which suggests potential to divide into 5-acre lots. Again, is this the intent? Perhaps RA-10 would be appropriate, or no zoning suffix at all.

C. Miscellaneous Parcels, Zoning Errors or Questions. The following parcels have errors in GIS zoning map information, or the zoning assigned may be inappropriate:

1) **APN 53020015.** This is an 83-acre parcel with "Zoning WL" shown. There is no WL zone, this is an error. The Land Use is WL, Working Lands; the zoning should be A1.

2) **APN(s) 50002120, APN 48025034** (adjacent, same owner). These two parcels are enrolled in the Williamson Act and are Zoned AP (which is correct) but the GIS map shows both parcels on the "Zone Change GP Consistency" layer and shows "pzoning U" and "change_zon A1." This is an error.

3) **APN(s) 066029024, 066029026, 066031035, 066030036, 066030037, 066022026.** Parcels total approximately 900 acres (east of Vallecito, above the Stanislaus River), and *all parcels are all in Conservation Easements in the "Ordway Pocket Ranch Wildlife Sanctuary", Humane Society Wildlife Land Trust CCED 10179, see page: <http://www.wildlifelandtrust.org/sanctuaries/ordway-pocket-ranch-wildlife.html>*. These parcels show up on the Ag Preserve layer; all but one have an assigned a Land Use of Industrial and a Zoning of M2. The last parcel, APN 066022026, is in Resource Protection land use, with "U" zoning/ proposed to be changed to "A1." *Industrial Land Use and the Industrial Zoning designations are inconsistent with the property's status in Calaveras County as a permanently protected conservation easement and wildlife sanctuary (since 2007).* Suggest changing all parcels to Resource Protection and changing the Zoning from M2 and A1 to AP or other appropriate zoning, such as Open Space.

4) **22,000+ Acres of Conservation Easements in Calaveras County.** There are over 22,000 acres of permanently protected conservation easement lands in Calaveras County. See the California Conservation Easement Database 2020b for recent maps and location of these properties (<https://data.cnra.ca.gov/dataset/california-conservation-easement-database>) and the CPAD+CCED-Callifornia's Protected Areas website <https://www.calands.org/> . These protected lands are not shown on County general plan maps or GIS layers, so there is no way to check for land use or zoning inconsistencies or conflicts. We suggest the County create a GIS Open Space map layer showing all lands in Calaveras County that are under permanent conservation protection.

Again, thank you for the opportunity to provide comments on the draft proposed Zoning Map Update.

Respectfully,

Colleen Platt, Secretary
MyValleySprings.com

Cc: Calaveras County Planning Commissioners
Joyce Techel, President, MyValleySprings.com
Tom Infusino, Calaveras Planning Coalition