



County of Yolo

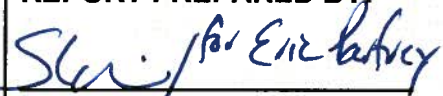
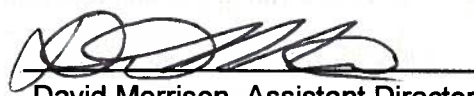
PLANNING AND PUBLIC WORKS DEPARTMENT

John Bencomo
DIRECTOR

292 West Beamer Street
Woodland, CA 95695-2598
(530) 666-8775 FAX (530) 666-8156
www.yolocounty.org

PLANNING COMMISSION STAFF REPORT

October 14, 2010

FILE #2002-043: 2010 Capay Valley Area Plan	
APPLICANT: Yolo County	
LOCATION: Capay Valley planning area (APN: numerous) (see Figure 1 in Attachment A)	SUPERVISOR: District 5 (Sup. Chamberlain) SOILS: Class I-IV FLOOD ZONE: A, B, and C FIRE ZONE: in the high and very high fire hazard severity zones
GENERAL PLAN: several designations ZONING: several districts	
ENVIRONMENTAL DETERMINATION: Negative Declaration	
REPORT PREPARED BY:  Eric Parfrey, Principal Planner	REVIEWED BY:  David Morrison, Assistant Director

RECOMMENDED ACTIONS:

That the Planning Commission recommends the Board of Supervisors:

1. **HOLD** a public hearing and receive public comments on the 2010 Capay Valley Area Plan (**Attachment A**);
2. **ADOPT** the Resolution certifying that the Initial Study/Negative Declaration is the appropriate level of environmental document for this project and that it has been completed in accordance with the California Environmental Quality Act (CEQA) and CEQA Guidelines (**Attachment B**); and
3. **APPROVE** the Resolution amending the Yolo County General Plan to rescind the 1982 Capay Valley Area General Plan and adopt the 2010 Capay Valley Area Plan (**Attachment C**).

REASONS FOR RECOMMENDED ACTIONS:

An update of the Capay Valley Area Plan (formerly called the Capay Valley Area General Plan) was completed in 2006 and recommended for approval by the Planning Commission in January, 2007. The Board of Supervisors held hearings on the updated plan and, in September, 2007, directed staff to put the plan on hold until the new 2030 Yolo Countywide General Plan had been approved. The County General Plan was adopted by the Board of Supervisors in November, 2009. The draft Capay Valley Area Plan has been further revised

to ensure consistency with the newly adopted Countywide plan, and is now ready for approval as the first of several "area," "community," or "specific" plans that will be prepared for portions of the unincorporated area.

BACKGROUND:

The Planning Commission heard this item as a workshop at the last meeting on September 9, 2010. At the conclusion of the workshop, the commission directed staff to return the draft plan with no major revisions to the commission for formal recommendations to the Board of Supervisors.

As noted in the previous staff report for the September 9, 2010 workshop, the latest 2010 update of the Capay Valley Area Plan includes the following changes to the 2006 version of the plan that was last heard by the Planning Commission:

- Background descriptive text and figures have been updated or deleted;
- All references to zoning districts and regulations have been deleted;
- All of the land use maps for each of the communities have been updated; and
- Policies and implementation measures have been updated and revised.

The biggest single change to the latest draft plan involves editing the document to remove background text and figures that in many cases were out of date and not directly related to the main purpose of the plan. The 2010 draft plan does not propose rezoning at this time; a countywide rezoning program will be proposed later this year when new countywide zoning regulations are being considered. Thus, the 2010 draft plan has been edited to remove all references to zoning districts and zoning regulations.

All of the General Plan land use designation maps (as opposed to zoning maps) for each of the communities in the Capay Valley have been updated to incorporate the revisions to the land use designations that were adopted last November as part of the 2030 Yolo Countywide General Plan, including "Urban Growth Boundaries" for each of the separate communities of the Capay Valley (Capay, Guinda, Rumsey, and Brooks).

Several of the policies and implementation measures included in the 2010 Capay Valley Area Plan have also been updated and revised to bring the policies into compliance with the countywide General Plan.

At the Planning Commission workshop at the last meeting on September 9, 2010, Andrew Fulks of Tuleyome testified and recommended numerous specific text changes to some of the parks and natural resources policies and text in the draft plan. Tuleyome followed up with an October 6, 2010 letter detailing the proposed edits (Attachment D). Staff had already incorporated some earlier changes recommended by Tuleyome in the August, 2010 draft plan. Staff has the following responses to the additional edits that are proposed by Tuleyome in the latest letter (edits are shown in strikeout and underline):

Page GPI-16, Goal 1, Policy 1: Staff proposes the following edit, to read: "The agrarian character of the Capay Valley Planning Area depends on the maintenance of large areas of "open space," principally tracts of rangeland, ridge top areas, open space and creek environment reserved as natural habitat for wildlife, flora and fauna. ~~The County shall coordinate with other agencies and programs to create suitable recreational areas and ecological education sites.~~ "

GPI-17, Policy 7: No change. Staff agrees with the citizens advisory committee, which requested the deletion of the underlined phrase. Other policies already encourage conservation easements (Policy 8) and the study of additional recreation facilities along Cache Creek (Goal 4, Policy 2).

GPI-19, Goal 3, Implementation Measure 3: Staff proposes the following edits: "~~In concert with implementation measure #1, t~~The County will investigate the development of a water quality monitoring program for the middle reach of Cache Creek, between Buck Island and Rumsey, to occur at regular intervals during summer months throughout the year to inform the public if the level of coliform organisms becomes dangerously high."

GPI-19, Goal 4, Policy 2, Implementation Measure 4: Staff agrees with the proposed edits, as follows: "Park expansion ~~of~~ or land acquisition must not interfere with local agricultural activities, ~~infringe on~~ physically impact adjoining property, or degrade natural habitat."

GPI-18, Goal 2, Policy 5, Implementation Measure 1: Staff agrees with the proposed edit, as follows: "In conjunction with existing Cache Creek Regional Park, encourage the County to investigate routes providing safe access to the south side of Cache Creek for ~~pedestrian and equestrian~~ non-motorized traffic only."

GPI-20, Policy 1, Implementation Measure 1: No change. The measure refers to a countywide noise ordinance, which will apply to a variety of uses located throughout the unincorporated area, including firing ranges, hunting clubs, and both private and public airports.

GPI-21, Goal 3 and Implementation Measure 1: Staff agrees with the proposed edit, as follows: Change Goal 3 to read: "Encourage respect for property and discourage and/or prosecute acts of trespassing promptly." Change Implementation Measure 1 to read: "~~Strengthen~~ Enforce laws concerning trespassing."

GPI-21, Goal 3: No change. The issues of trespass and public access can be complex and varied depending on the circumstances. The ordinary high water mark for Cache Creek and/or the alignment of County rights-of-way are not always clearly defined. It would be difficult to create an education program that would provide appropriate guidance to both landowners and the public regarding these issues.

GPI-25, Goal 10, Policy 1, Implementation Measure 1. Staff proposes the following edit in lieu of the proposed wording: "The County shall protect the present insurance rating and service in this district by discouraging ~~industrial, residential, and recreational~~ private development in areas difficult or time consuming to reach."

CIR-3, Paragraph 2 titled Pedestrian: Staff agrees with the proposed edit, as follows: "...The trails in Cache Creek Regional Park and the hunting trails throughout the watershed and foothill areas, which are operated by the Bureau of Land Management ~~or the local hunting clubs,~~ provide extensive areas for hiking."

CN-20, Paragraph 5 titled Public Lands: Staff proposes the following edits: "The lower park site of Cache Creek Canyon Regional Park is immediately adjacent to the 750,000 acre Cache Creek Natural Area, which s of Bureau of Land Management property that supports recreational opportunities such as hiking, biking, fishing, and horseback riding. In addition, there are other public lands in the area, including the BLM lands at Berryessa Peak west of Brooks, and the BLM lands near Glascock Mountain and Cortina Ridge."

CN-25, Paragraph 4 titled Public Access. The text has already been edited to include a discussion of the Blue Ridge Trail. Staff does not recommend any further edits.

In addition, staff recommends making the following additional edits:

GPI-21, Goal 3, Policy 2 should read: "Placement of signs indicating private lands and points of public egress."

GPI-21, Goal 3, Policy 2, Implementation Measure 1 should read: "The County shall post Cache Creek for the following: the lawful egress points for boaters and rafters at (the Rumsey Bridge and the Nichols Park at the Guinda Bridge), and shall post parking restrictions at the Rumsey bridge..."

Text on page CN-24, Rafting. Delete reference to Boy Scouts owning Camp Haswell. The text should be modified to indicate that Camp Haswell is now owned by the County.

PUBLIC AND AGENCY COMMENTS:

The most recent 2010 draft plan was circulated to members of the Capay Valley Citizens Advisory Committee in July 2010. The committee was scheduled to review the new proposed changes at their meeting on September 1, 2010, but did not have a quorum. The committee was again scheduled to review the plan at their meeting on October 6, 2010. They started to draft their comments and agreed to hold a special meeting on October 12, 2010, to finish the review process.

A Negative Declaration was completed and circulated from August 1, 2006 to September 1, 2006, along with the previous draft plan, for public comments. No comments of a substantive nature were received.

Letters have been sent to the two Native American tribes in the county (Yoche Dehe Wintun Nation and the Cortina Band of Indians) to invite formal consultation, if requested by either tribe, on the proposed Capay Valley Area Plan, as required by State law (SB 18, enacted in 2004). County staff conducted a previous formal consultation with the Yoche Dehe Wintun Nation in 2007 on the previous 2006 draft plan, and the draft plan was significantly revised to include more text and policies regarding cultural resources. The same added sections are included in the 2010 draft plan.

A response has been received from Yoche Dehe Wintun Nation, requesting consultation on the most recent 2010 draft plan, which is scheduled to occur in late October, 2010. Any changes agreed to the draft Capay Valley Area Plan at that time would be included in staff's recommendation to the Board of Supervisors.

ATTACHMENTS

Attachment A – 2010 Capay Valley Area Plan (not attached), previously distributed to the Commissioners on September 9, 2010, and located online at: <http://www.yolocounty.org/Index.aspx?page=728>

Attachment B – Resolution of the Yolo County Board of Supervisors Adopting the Negative Declaration for the 2010 Capay Valley Area Plan

Attachment C – Resolution of the Yolo County Board of Supervisors Amending the Yolo County General Plan to Rescind the 1982 Capay Valley Area General Plan and Adopt the 2010 Capay Valley Area Plan

Attachment D – October 6, 2010 Letter from Tuleyome

Attachment A

2010 Capay Valley Area Plan (August, 2010)

RESOLUTION OF THE BOARD OF SUPERVISORS OF BUTTE COUNTY
ADOPTING THE 2010 CAPAY VALLEY AREA PLAN

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

WHEREAS, the Board of Supervisors of Butte County, California, is authorized by the State Constitution and the State Statutes to adopt a general plan for the county, and

Attachment B

RESOLUTION NO. ___-___

RESOLUTION OF THE YOLO COUNTY BOARD OF SUPERVISORS ADOPTING THE NEGATIVE DECLARATION FOR THE 2010 CAPAY VALLEY AREA PLAN

WHEREAS, the County of Yolo ("County") prepared an updated 2006 Capay Valley Area Plan, including the reformatting of the plan, updating some of the policies, and re-designating various properties in Capay, Guinda, Rumsey, and Brooks, to be consistent with the Yolo County General Plan; and

WHEREAS, the Capay Valley Area Plan environmental document, consisting of an Initial Study/Negative Declaration, was prepared pursuant to the California Environmental Quality Act ("CEQA") (Pub. Res. Code Section 21000 et seq.); and

WHEREAS, on June 28, 2006, August 30, 2006, September 27, 2006, and November 29, 2006, County staff held public meetings regarding the scope of the Initial Study/Negative Declaration; and

WHEREAS, the Planning Commission, on November 30, 2006, January 11, 2007, August 9, 2007, held public meetings and workshops to receive comments regarding the adequacy of the Initial Study/Negative Declaration; and

WHEREAS, the Capay Valley Area Plan Initial Study/Negative Declaration were circulated for a 45-day public review period between August 1, 2006 through September 15, 2006; and

WHEREAS, on September , 2007, the Board of Supervisors directed staff to hold approval of the Capay Valley Area Plan until after the adoption of the 2030 Yolo Countywide General Plan; and

WHEREAS, on November 10, 2009, the Board of Supervisors approved the adoption of the 2030 Yolo Countywide General Plan and the accompanying Final Environmental Impact Report (SCH#2008102034), which included actions that changed some of the land use designations in the Capay Valley Area Plan;

WHEREAS, in March, 2010, County staff began updating the previous draft 2006 Capay Valley Area Plan to be consistent with the newly approved Countywide General Plan; and

WHEREAS, October 14, 2010 the Planning Commission held a hearing to receive public testimony and take action on the revised 2010 Capay Valley Area Plan, and the Initial Study/Negative Declaration, by developing a recommendation to the Board of Supervisors;

WHEREAS, on October 14, 2010 the Planning Commission voted ___ YES and ___ NOES to recommend adoption of the updated 2010 Capay Valley Area Plan and the Initial Study/Negative Declaration; and,

WHEREAS, the Board has reviewed the Initial Study/Negative Declaration, the Board letter pertaining to these documents and the Capay Valley Area Plan, and all other written and oral comments received in connection with the Project; and,

NOW, THEREFORE, BE IT RESOLVED by the Board of Supervisors of the County of Yolo as follows:

1. The foregoing recitals are hereby true and correct.
2. The Board of Supervisors has independently reviewed and analyzed the Initial Study/Negative Declaration, attached hereto as EXHIBIT B, considered the information and analysis contained therein and all written and oral comments received on the Project and these documents, and finds that the Initial Study/Negative Declaration reflects the independent judgment and analysis of the Board of Supervisors.
3. The Board of Supervisors further finds that the Initial Study/Negative Declaration has been completed in compliance with CEQA and all other legal requirements.
4. A Notice of Determination shall be filed immediately after approval of the project.
5. This Resolution shall take effect and be in force thirty (30) days after its passage, and prior to expiration of fifteen (15) days after its passage thereof, shall be published by title and summary only in the Davis Enterprise together with the names of members of the Board of Supervisors voting for and against the same.

PASSED AND ADOPTED by the Board of Supervisors of the County of Yolo following a noticed public hearing on the _____ day of _____, 2010, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

Helen Thomson, Chairwoman
Yolo County Board of Supervisors

ATTEST:
Julie Dachtler, Deputy Clerk
Board of Supervisors

APPROVED AS TO FORM;
Robyn Truitt Drivon, County Counsel

By _____
Deputy (Seal)

By _____
Philip J. Pogledich, Senior Deputy

Attachment C

RESOLUTION NO. 2010-_____

RESOLUTION OF THE YOLO COUNTY BOARD OF SUPERVISORS AMENDING THE YOLO COUNTY GENERAL PLAN TO RESCIND THE 1982 CAPAY VALLEY GENERAL PLAN AND ADOPT THE 2010 CAPAY VALLEY AREA PLAN

WHEREAS, the County initiated the amendment of the Capay Valley Area Plan, prepared in 1982, to supplement the Yolo County General Plan by providing land use policies, goals and programs specific to the Capay Valley; and

WHEREAS, County staff held duly noticed public hearings and workshops on May 31, 2006 and June 28, 2006 with regard to the update of the Capay Valley Area General Plan, specifically seeking public input regarding plan content and related issues; and

WHEREAS, the Capay Valley Area Plan and supporting documents were made available to the public for a 45-day public review period from August 1, 2006 to September 15, 2006, and again between August 15 and October 14, 2010; and

WHEREAS, the Yolo County Planning Commission held a duly noticed public hearing on January 11, 2007 to receive public testimony regarding the 2006 Capay Valley Area Plan, the Negative Declaration prepared in accordance with the requirements of the California Environmental Quality Act, and a related rezoning ordinance, and to make recommendations to the Board of Supervisors; and

WHEREAS, the Planning Commission held a duly noticed public hearing on February 27, 2007, to receive public testimony, consider the Planning Commission's recommendations, and take action on the 2006 Capay Valley Area Plan, Negative Declaration, and related resolutions and ordinance; and

WHEREAS, the Planning Commission held a duly noticed public hearing on October 14, 2010, to receive public testimony, consider the Planning Commission's recommendations, and take action on the revised 2010 Capay Valley Area Plan, Negative Declaration, and related resolutions and ordinance; and

WHEREAS, the Board, based on oral testimony and documentary evidence submitted during the public hearing, now finds it proper to rescind the 1982 Capay Valley Area General Plan, adopt the 2010 Capay Valley Area Plan, and incorporate it into the County General Plan, and take certain related actions by a separate Resolution adopted concurrently herewith;

NOW, THEREFORE, BE IT RESOLVED by the Board of Supervisors of the County of Yolo as follows:

1. The foregoing recitals are true and correct.
2. The Board finds that the actions as set forth in this Resolution are in the public interest and necessary to public health, safety, and welfare.
3. The Board of Supervisors hereby rescinds the 1982 Capay Valley Area General Plan and adopts the 2010 Capay Valley Area Plan.

4. The Board of Supervisors hereby amends the Yolo County General Plan to include the 2010 Capay Valley Area Plan, dated August, 2010 and attached hereto as Exhibit ____.
5. This Resolution shall take effect and be in force thirty (30) days after its passage, and prior to expiration of fifteen (15) days after its passage thereof, shall be published by title and summary only in the Daily Democrat together with the names of members of the Board of Supervisors voting for and against the same.

PASSED AND ADOPTED by the Board of Supervisors of the County of Yolo following a noticed public hearing on the _____ day of _____, 2010, by the following vote:

AYES:
NOES:
ABSENT:
ABSTAIN:

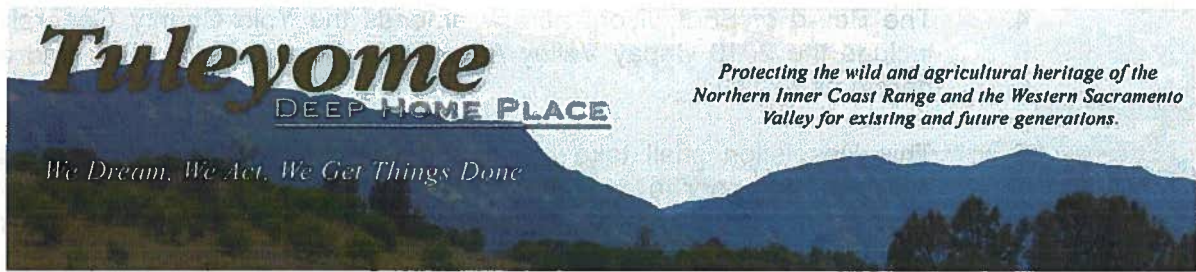
Helen Thomson, Chairwoman
Yolo County Board of Supervisors

ATTEST:
Julie Dachtler, Deputy Clerk
Board of Supervisors

APPROVED AS TO FORM;
Robyn Truitt Drivon, County Counsel

By _____
Deputy (Seal)

By _____
Philip J. Pogledich, Senior Deputy



October 6, 2010

David Morrison
Yolo County Planning and Public Works
292 West Beamer Street
Woodland, CA 95696

Re: Capay Valley Area Plan comments

Dear Members of the Yolo County Planning Commission,

Tuleyome has the following comments on the Capay Valley Area Plan:

GPI-16, Goal 1, Policy 1: As this section is on recreation, as well as open space, we recommend the following addition (in bold):

The agrarian character of the Capay Valley Planning Area depends on the maintenance of large areas of "open space," principally tracts of rangeland, ridge top areas, open space and creek environment reserved as natural habitat for wildlife, flora and fauna. The County shall coordinate with other agencies and programs to create suitable **recreational areas and** ecological education sites.

GPI-17, Policy 7: This policy should be returned to the original version, without strikeouts, to include conservation easements, designation of additional parks, open space and wildlife habitat, in addition to agricultural uses, as open space preservation tools. All of these deleted elements have proven to be very effective in preserving open areas and are reasonable to include.

GPI-19, Goal 3, Implementation Measure 3: This measure, to conduct continual monitoring of Cache Creek between Buck Island and Rumsey for coliform levels, is unnecessary and will be expensive for the County. Buck Island, as well as all the other public access areas along that stretch of the creek, has sanitation facilities. The amount of human use, coupled with the volume of water coming down the creek during prime use months, it would be impossible to contaminate the creek to the level that coliforms were detectable. Only a sewage spill from an urban area, such as a town around Clear Lake, could have an impact on the creek such that water users would have to be notified. It would be more likely that coliform and giardia levels would be higher on tributary streams next to cattle grazing operations, than from recreational use of the creek.

We recommend e-coli monitoring at the Yolo County line for background data, and monitoring downstream at Rumsey, Guinda, and the Capay Dam. This would give relative measurements related to both recreation and cattle grazing, rather than focusing on recreation as a contaminant source.

GPI-19, Goal 4, Policy 2, Implementation Measure 4: Change the third word from 'of', to 'or', and remove 'infringe on adjoining property'. There is no definition of what an infringement would be, and it could be argued that even seeing a park or trail from an adjoining property would be an infringement. Text could be changed to 'physically impact adjoining property', which would be more accurate in terms of the type of avoidance that one would reasonably expect.

GPI-18, Goal 2, Policy 5, Implementation Measure 1: Change 'pedestrian and equestrian' to 'non-motorized'. Mountain bicyclists also use the park land on the south side of Cache Creek, and non-motorized would be more inclusive and still meet the intent of not creating an OHV route through the park.

GPI-20, Policy 1, Implementation Measure 1: It is unlikely that the County will be able to create and enforce noise standards for aircraft and firearms. Aircraft already have minimum ceiling levels of 500-feet over rural areas, and unless there is a firearm ban on private property it will be difficult to regulate caliber and subsequently, noise.

GPI-21, Goal 3: Recommend changing the goal to read, 'Encourage respect for property.' In addition, implementation measure 1 is unnecessary. Current California Code Section 602 deals with the penalties for trespassing, with the ability to conduct arrests and levy fines. Recently the fine was increased to \$1000 for trespassing on lands that produce food. This would apply to almost all Capay Valley land, including rangelands. It is not clear how the County could create or even implement any additional law that would be greater in penalty than current State law.

GPI-21, Goal 3: Recommend adding an implementation measure regarding education of rural residents on the rights of the public as it relates to road and river use. Cache Creek is a navigable waterway under federal law, and while trespass across private property is not allowed to reach a navigable waterway, use of a navigable waterway across private land is allowed below the ordinary high water mark. Landowners have been known to tell boaters they are trespassing when floating through private property. In addition, boaters may enter and exit the water from within County rights-of-way. Below Camp Haswell, boaters may enter and exit the water at the Rumsey Bridge and Nichols Park at the Guinda Bridge. Below Nichols Park there are presently no legal ingress or egress sites, even though the river is still navigable.

Regarding roads, numerous members of the public, in addition to County staff, have been told they are trespassing while hiking or biking on County Roads within the Capay Valley. Visitors have also been told they are trespassing when parking on the side of County roads, within the right-of-way. Yolo County Code, Title 4, Section 3.103, sets a

maximum parking duration of 72 hours on County roads, provided that vehicles are not blocking the path of travel.

We recommend an implementation measure such as:

Educate Capay Valley residents and visitors as to the public's right to float Cache Creek, where they can legally enter and exit the water, rights to use public roads for activities other than driving, and regulations related to parking along County roadways within the rights-of-way.

GPI-25, Goal 10, Policy 1, Implementation Measure 1: The idea of discouraging recreational development in areas that are 'difficult or time consuming to reach' appears to be an attempt to preclude recreational trail development in the hills. The ideas of 'time consuming' or 'difficult' are subjective. Recommend removing 'recreational' from the list of discouraged activities.

CIR-3, Pedestrian: the trails operated by local hunting clubs are not available to the general public for hiking, and reference to 'hunting clubs' should be removed.

CN-20: The section on Public land only mentions Cache Canyon Regional Park. In addition to the BLM and County land in Cache Canyon, there are also the BLM Berryessa Peak lands to the west of Brooks, and the BLM Glascock Mountain/Cortina Ridge lands. As a general comment, much of the focus of the document is related to Cache Canyon when mentioning public lands.

CN-25, Public Access: Discussion of the Blue Ridge Trail has been ongoing since the 1950's, per our earliest records. The BLM began acquiring trail easements in the 1960's, with initial portions of the trail constructed in the 1980's. Construction is ongoing, with the recent acquisition of an easement to Berryessa Peak on the Napa side of the ridge.

The general tone of the document, particularly as it pertains to recreation, is somewhat negative. This could be remedied by rephrasing elements to promote positive policies, rather than developing policies as 'prohibited' or 'discouraged.' The document as a whole should be more visionary about what it wants this portion of the County to look like in the next 20 years, rather than trying to stop all change.

Thank you for the opportunity to comment on this Area Plan.

Sincerely,



Andrew Fulks
President, Tuleyome