Conservation and Open Space Element

Comments prepared by committee members and reviewed at an open committee meeting on March 10, 2009. Attending were committee members Dawn Dunlap and Mary Giacoletti, NCAC alternates Debbie Mix and Joyce Renshaw and was chaired by Amanda Rice.

AIR QUALITY GOALS AND POLICY AREAS

Goal AQ 1 The County will reduce per capita vehicle-miles-traveled.

Policy AQ 1.1 Compact development
Policy AQ 1.2 Reduce vehicle miles traveled
Policy AQ 1.3 Convenient alternative transportation
Policy AQ 1.4 Alternative transportation improvements
Policy AQ 1.5 Transportation efficiency
Policy AQ 1.6 Multi-modal transportation
Policy AQ 1.7 Bicycle and pedestrian travel
Policy AQ 1.8 Use of rail

Goal AQ 2 The County will be a leader in implementing air quality programs and innovations.

Policy AQ 2.1 Employer-based trip reduction
Policy AQ 2.2 Reduce vehicle trips
Policy AQ 2.3 Convert county fleet
Policy AQ 2.4 Waste collection vehicles
Policy AQ 2.5 Use of clean fuels
Policy AQ 2.6 Alternative fuel incentives

Goal AQ 3 State and federal ambient air quality standards will be attained and maintained.

Policy AQ 3.1 Coordinate with other jurisdictions
Policy AQ 3.2 Attain air quality standards
Policy AQ 3.3 Avoid air pollution increases
Policy AQ 3.4 Toxic exposure
Policy AQ 3.5 Equitable decision making
Policy AQ 3.6 Strategic growth principles
Policy AQ 3.7 Reduce vehicle idling
Policy AQ 3.8 Reduce dust emissions

Goal AQ 4 Greenhouse gas emissions from County operations and emissions sources will be reduced.

Policy AQ 4.1 Reduce greenhouse gas emissions
Policy AQ 4.2 Mitigate greenhouse gas emissions
Policy AQ 4.3 County operations
Policy AQ 4.4 Development projects
Policy AQ 4.5 Carbon sinks
Policy AQ 4.6 Regional organizations

Goal AQ 5 The County will adapt to adverse climate change.

Policy AQ 5.1 Adapt to climate change
Policy AQ 5.2 Public awareness

BIOLOGICAL RESOURCE GOALS AND POLICY AREAS

Goal BR 1 Native habitat and biodiversity will be protected and enhanced.

Policy BR 1.1 Protect Sensitive Biological Resources
Policy BR 1.2 Limit Development Impacts
Policy BR 1.3 Environmental Review
Policy BR 1.4 No Net Loss
Policy BR 1.5 Establish and Maintain a Network of Major Ecosystems
Policy BR 1.6 Ecosystem Management

Policy BR 1.7 Ecosystem Education
Policy BR 1.8 Effects on Agricultural Uses
Policy BR 1.9 Preserve Ecotones
Policy BR 1.10 Identify and Protect Ecologically Sensitive Areas
Policy BR 1.11 Protect Wildlife Nursery Areas and Movement Corridors
Policy BR 1.12 Development Impacts to Corridors
Policy BR 1.13 Maintain Safe Wildlife Movement
Policy BR 1.14 Wildlife and Roadways
Policy BR 1.15 Disturbance in Sensitive Habitat During Nesting Season
Policy BR 1.16 Land Acquisition

Goal BR 2 Threatened, rare, endangered, and sensitive species will be protected and enhanced.

Policy BR 2.1 Coordinate with Trustee Agencies
Policy BR 2.2 Promote Early Consultation with Other Agencies
Policy BR 2.3 Habitat Conservation Plans
Policy BR 2.4 Species Recovery Programs
Policy BR 2.5 Species Recovery Plans and General Plan Amendments
Policy BR 2.6 Development Impacts to Listed Species
Policy BR 2.7 Fire Suppression and Sensitive Plants and Habitats
Policy BR 2.8 Invasive Plant Species
Policy BR 2.9 Promote Use of Native Plant Species
Policy BR 2.10 Non-toxic Pest Control
Policy BR 2.11 Control Spread of Non-native Invasive Animal Species

Goal BR 3 Woodlands, forests, and trees will be protected and enhanced.

Policy BR 3.1 Native Tree Protection
Policy BR 3.2 Protection of Native Trees in New Development
Policy BR 3.3 Oak Woodland Preservation
Policy BR 3.4 Vegetation and Wildlife Disease Management Programs
Policy BR 3.5 Nonnative Trees

Goal BR 4 The natural structure and function of streams and riparian habitat will be protected and restored.

Policy BR 4.1 Protect Stream Resources
Policy BR 4.2 Minimize Impacts from Development
Policy BR 4.3 Alluvial Well Extractions
Policy BR 4.4 Vegetated Treatment Systems
Policy BR 4.5 Encourage Stream Preservation on Private Lands
Policy BR 4.6 Encourage Stream Preservation on Public Lands
Policy BR 4.7 Contamination from Pesticides
Policy BR 4.8 Runoff from County Lands
Policy BR 4.9 Pesticide Reduction
Policy BR 4.10 Vector Control

Goal BR 5 Wetlands will be preserved.

Policy BR 5.1 Protect Wetlands
Policy BR 5.2 No Net Loss of Wetlands
Policy BR 5.3 Wetland Conversion
Policy BR 5.4 Wetlands on Agricultural Lands

Goal BR 6 The county's fisheries and aquatic habitats will be preserved and improved.

Policy BR 6.1 Avoid Impacts to Fisheries

Goal BR 7 Significant marine resources will be protected.

Policy BR 7.1 Coastal Protection
Policy BR 7.2 Protection of Marine Resources
Policy BR 7.3 Agricultural Best Management Practices

Policy BR 7.4 Sedimentation
Policy BR 7.5 Morro Bay Watershed
Policy BR 7.6 Morro Bay Estuary Water Quality
Policy BR 7.7 Watershed Protection

CULTURAL RESOURCES GOALS AND POLICY AREAS
Goal CR 1 The County will have a strong, positive community image that honors our history and cultural diversity.
Policy CR 1.1 Cultural Identity
Goal CR 2 The public will be aware of and support preservation of cultural resources in order to maintain the county's uniqueness and promote economic vitality.
Policy CR 2.1 Community Participation
Policy CR 2.2 Acquisition
Policy CR 2.3 "Living Resources"
Goal CR 3 The county's historical resources will be preserved and protected. (CR2)
Policy CR 3.1 Historic Preservation
Policy CR 3.2 Historic Preservation Programs
Policy CR 3.3 Remodeling and Reconstruction
Goal CR 4 The County's known and potential archaeological and paleontological resources will be preserved and protected.
Policy CR 4.1 Non-development Activities
Policy CR 4.2 Protection of Native American Cultural Sites
Policy CR 4.3 Cultural Resources and Open Space
Policy CR 4.4 Development Activities and Archaeological Sites
Policy CR 4.5 Paleontological Resources
Policy CR 4.6 Stream-Based Sensitivity

4

ENERGY RESOURCES GOALS AND POLICY AREAS
Goal E 1 The county will have a sustainable supply of energy.
Policy E 1.1 Meeting energy needs
Policy E 1.2 Local control
Policy E 1.3 Renewable energy and county facilities
Policy E 1.4 Methane
Policy E 1.5 Waste burning
Goal E 2 The County's energy consumption will be reduced.
Policy E 2.1 Energy efficiency
Policy E 2.2 Energy consumption at county facilities
Policy E 2.3 Energy and water
Goal E 3 Energy efficiency and conservation will be promoted in all development.
Policy E 3.1 Use of renewable energy
Policy E 3.2 Solar access
Policy E 3.3 Energy efficient equipment
Policy E 3.4 Use of renewable energy for water and wastewater
Policy E 3.5 Incentives for energy conservation
Policy E 3.6 Demonstration projects
Policy E 3.7 Energy conservation in agriculture
Goal E 4 Green building practices will be integrated into all development.
Policy E 4.1 Integrate green building practices
Policy E 4.2 Green building incentives

Policy E 4.3 Green County buildings
Policy E 4.4 Solar exposure
Policy E 4.5 Healthy indoor environments
Goal E 5 Recycling, waste diversion, and reuse will be increased.
Policy E 5.1 Source reduction and waste diversion
Policy E 5.2 County operations and waste
Policy E 5.3 Biomass and composting
Policy E 5.4 Construction and demolition waste
Policy E 5.5 Sustainable materials in County buildings
Goal E 6 The use of renewable energy resources will be increased.
Policy E 6.1 Sustainable energy sources
Policy E 6.2 Commercial solar power systems
Policy E 6.3 Renewable energy resources
Policy E 6.4 Solar electric power facilities
Policy E 6.5 Geothermal resources
Policy E 6.6 Distributed energy
Policy E 6.7 Cogeneration facilities
Goal E 7 Appropriate energy facility design, siting, and operation will be ensured.
Policy E 7.1 Energy Facility Siting
Policy E 7.2 Facility Upgrades and Replacements
Policy E 7.3 Safety Coordination
Policy E 7.4 National Repository for Nuclear Waste

MINERAL RESOURCES GOALS AND POLICY AREAS
Goal MN 1 Conservation and development of significant mineral deposits will be a high priority, but will be balanced with other County general plan goals and policies.
Policy MN 1.1 Balance Test
Goal MN 2 Significant mineral resources will be protected from land uses that threaten their availability for future mining.
Policy MN 2.1 Protect Mineral Resources
Policy MN 2.2 Incompatible Development
Policy MN 2.3 General Plan Amendments
Policy MN 2.4 Discretionary Land Use Permits
Goal MN 3 Mining of mineral resources will not adversely impact sensitive natural resources and existing uses.
Policy MN 3.1 Environmental effects
Policy MN 3.2 Reclamation
Policy MN 3.3 Environmentally and Visually Sensitive Areas
Policy MN 3.4 Site restoration
Policy MN 3.5 Best Management Practices

SOIL RESOURCES GOALS AND POLICY AREAS
Goal SL 1 Important soils that are essential to agriculture will be conserved
Policy SL 1.1 Loss of Topsoil
Policy SL 1.2 Protect Important Agricultural Soils
Goal SL 2 Watersheds and their soils and vegetation will be protected.
Policy SL 2.1 Protect Watersheds and Aquifer Recharge Areas
Policy SL 2.2 Protect Upland Vegetation
Policy SL 2.3 New Development

OPEN SPACE GOALS AND POLICY AREAS
Goal OS 1 Important open space areas will be identified, protected, sustained, and where

necessary, restored and reclaimed.
Policy OS 1.1 Future Open Space Protection
Policy OS 1.2 Consolidation of Public and Private Lands
Policy OS 1.3 Supporting other agencies
Policy OS 1.4 Retention of public lands for open space
Policy OS 1.5 Retention of BLM lands
Policy OS 1.6 Land Conservation Contracts
Policy OS 1.7 Use of TDC to protect open space
Policy OS 1.8 Land Divisions and Development
Policy OS 1.9 Acquisition Preferences
Policy OS 1.10 Interagency coordination for acquisition
Policy OS 1.11 County Land Acquisition Consistent with PRE
Policy OS 1.12 Funding of Land Acquisition
Policy OS 1.13 Tax Default Acquisition and Sale of Excess and Tax Delinquent Properties
Policy OS 1.14 Land Exchange of County-owned properties
Policy OS 1.15 Land Use Designation for County lands
Goal OS 2 Open space resources will be protected and sustained on public lands.
Policy OS 2.1 Open space management to protect and sustain
Policy OS 2.2 Open space management to protect and restore
Policy OS 2.3 Coordinate open space management
Policy OS 2.4 Best Management Practices
Policy OS 2.5 Disposal of bio-solids on open space lands
Policy OS 2.6 Grazing and agricultural uses on county lands
Policy OS 2.7 Support federal lands for grazing
Policy OS 2.8 Support voluntary incentives for protection
Policy OS 2.9 Coordination open space planning
Policy OS 2.10 Management of Natural Area Preserves
Policy OS 2.11 Recreational use of publicly-owned open space
Policy OS 2.12 Off-Highway Vehicles
Goal OS 3 Ongoing public education programs about conservation, protection, and stewardship of open space resources will be encouraged. (OSG 4)
Policy OS 3.1 Ongoing education and outreach
Policy OS 3.2 Conservation and Protection by Private Landowners
Goal OS 4 Urban sprawl and inappropriate development of rural areas will be prevented.
Policy OS 4.1 Define urban areas to prevent sprawl
Policy OS 4.2 Maintain community separators
Policy OS 4.3 Conversion of rural and open space lands to suburban & urban uses
Policy OS 4.4 Conversion of rural areas to Urban Lands
Policy OS 4.5 Criteria for conversion of Agriculture lands
Policy OS 4.6 Expansion of urban/village areas: timing
Policy OS 4.7 Expansion of urban/village areas: location
Policy OS 4.8 Annexation of urban development
Policy OS 4.9 Impacts of land conversions
Policy OS 4.10 Maintain large parcels
Policy OS 4.11 Conversion to small-lot rural parcels
Policy OS 4.12 Conversion to Small-lot Rural: criteria for Agriculture
Policy OS 4.13 Small-Lot Rural Conversion criteria – adj to urban or village areas
Policy OS 4.14 Small-Lot Rural Conversion criteria – not adjacent to URL

5

VISUAL RESOURCES GOALS AND POLICY AREAS
Goal VR 1 The natural and agricultural landscape will continue to be the dominant view in rural

parts of the county.
Policy VR 1.2 Adopt Scenic Protection Standards
Goal VR 2 The natural and historic character and identity of rural areas will be preserved.
Policy VR 2.1 Develop Consistent with Historical and Visual Resources
Policy VR 2.2 Site Development and Landscaping Sensitively
Policy VR 2.3 Revise Countywide Design Guidelines
Goal VR 3 The visual identities of communities will be preserved by maintaining rural separation between them.
Policy VR 3.1 Identify and Protect Community Separators
Policy VR 3.2 Community Involvement
Policy VR 3.3 Conservation Tools
Policy VR 3.4 Community Edges
Policy VR 3.5 Annexation in Community Separators
Goal VR 4 Visual resources will be protected within scenic corridors along well-traveled highways and roads.
Policy VR 4.1 Designation of Scenic Corridors
Policy VR 4.2 Balanced Protection
Policy VR 4.3 Agricultural Uses in Scenic Corridors
Policy VR 4.4 Scenic Preservation Collaborative Efforts
Policy VR 4.5 Scenic Corridor Roadway Design
Goal VR 5 Views from scenic vistas and vista points will be protected.
Policy VR 5.1 Retain Existing Scenic Access
Policy VR 5.2 Create New Scenic Access
Policy VR 5.3 Sale of Public Lands
Goal VR 6 A cohesive visual character will be maintained in urban areas.
Policy VR 6.1 Urban Design
Goal VR 7 Views of the night sky and its constellations of stars will be maintained.
Policy VR 7.1 Nighttime Light Pollution
Goal VR 8 Visual intrusions of signs will be minimized within public view corridors.
Policy VR 8.1 Billboards
Policy VR 8.2 Informational or Interpretive Signs
Goal VR 9 The visual effects of utility lines will be minimized.
Policy VR 9.1 Underground Utilities

WATER RESOURCES GOALS AND POLICY AREAS
Goal WR 1 The County will have a reliable and secure regional water supply (IRWM).
Policy WR 1.1 Protect water supplies
Policy WR 1.2 Expand desalination opportunities
Policy WR 1.3 Use reclaimed water
Policy WR 1.4 Interagency projects
Policy WR 1.5 Water dependent species
Policy WR 1.6 Agricultural operations
Policy WR 1.7 Use of surface water
Policy WR 1.8 Discourage small systems
Policy WR 1.9 Water wheeling
Policy WR 1.10 Reduce RMS alert levels
Policy WR 1.11 Impacts of new development
Policy WR 1.12 Density increases in rural areas
Policy WR 1.13 Avoid net increase in water use
Goal WR 2 The County will manage groundwater resources to ensure sustainable supplies for all beneficial uses.
Policy WR 2.1 Groundwater quality assessments

Policy WR 2.2 Groundwater basin reporting programs
Policy WR 2.3 Well permits
Policy WR 2.4 Groundwater recharge
Policy WR 2.5 Groundwater banking programs

Goal WR 3 Excellent water quality will be maintained for the health of people and natural communities.

Policy WR 3.1 Prevent water pollution
Policy WR 3.2 Protect watersheds
Policy WR 3.3 Improve groundwater quality
Policy WR 3.4 Water quality restoration
Policy WR 3.5 Support Resource Conservation Districts
Policy WR 3.6 Best practices for irrigation
Policy WR 3.7 Prevent pollution of water sources

Goal WR 4 Per capita potable water use in the county will decline by 20 percent by 2020.

Policy WR 4.1 Reduce water use
Policy WR 4.2 Water pricing structures
Policy WR 4.3 Water conservation
Policy WR 4.4 Reuse wastewater
Policy WR 4.5 Supplemental water
Policy WR 4.6 Gray water
Policy WR 4.7 Low Impact development
Policy WR 4.8 Efficient irrigation

Goal WR 5 The best possible tools and methods available will be used to manage water resources.

Policy WR 5.1 Watershed approach
Policy WR 5.2 Climate change
Policy WR 5.3 Cooperative water planning
Policy WR 5.4 Interagency projects
Policy WR 5.5 Coordinate water management plans
Policy WR 5.6 Dams and reservoirs

Goal WR 6 Damage to life, structures and natural resources from floods will be avoided.

Policy WR 6.1 Integrated management
Policy WR 6.2 Region-wide permitting
Policy WR 6.3 Flooding problems
Policy WR 6.4 Drainage problems
Policy WR 6.5 Integrated drainage approach
Policy WR 6.6 Stream channelization
Policy WR 6.7 Relocation of stream courses
Policy WR 6.8 Areas prone to flooding

6

- *AIR QUALITY GOALS AND POLICY AREAS*
- Goal AQ 1 The County will reduce per capita vehicle-miles-traveled.
- Policy AQ 1.1 Compact development
- Policy AQ 1.2 Reduce vehicle miles traveled
- Policy AQ 1.3 Convenient alternative transportation
- Policy AQ 3.7 Reduce vehicle idling
- Policy AQ 4.2 Mitigate greenhouse gas emissions
- *BIOLOGICAL RESOURCE GOALS AND POLICY AREAS*
- Policy BR 4.7 Contamination from Pesticides
- Goal BR 5 Wetlands will be preserved.

- Policy BR 7.3 Agricultural Best Management Practices
- Policy CR 4.1 Non-development Activities
- Policy E 1.5 Waste burning
- Goal E 5 Recycling, waste diversion, and reuse will be increased.
- Policy E 5.3 Biomass and composting
- Goal E 7 Appropriate energy facility design, siting, and operation will be ensured.
- *OPEN SPACE GOALS AND POLICY AREAS*
- Policy OS 2.11 Recreational use of publicly-owned open space
- Goal OS 4 Urban sprawl and inappropriate development of rural areas will be prevented.
- Policy OS 4.7 Expansion of urban/village areas: location
- *WATER RESOURCES GOALS AND POLICY AREAS*
- Policy WR 1.2 Expand desalination opportunities
- Policy WR 1.6 Agricultural operations
- Policy WR 1.11 Impacts of new development
- Policy WR 1.13 Avoid net increase in water use
- Goal WR 2 The County will manage groundwater resources to ensure sustainable supplies for all beneficial uses.
- Goal WR 4 Per capita potable water use in the county will decline by 20 percent by 2020.
- Policy WR 4.1 Reduce water use
- Policy WR 4.3 Water conservation
- Policy WR 4.6 Gray water
- Policy WR 5.2 Climate change
- Goal WR 6 Damage to life, structures and natural resources from floods will be avoided.

7

The overall organization of the document (starting with Goals and the Policies that reflect them and ending with Implementation Strategies) is strong and conceptually sound.

8

However, some strategies are too vague to be useful and others are too specific to be flexible. Examples of too vague: pp2.17 "Regularly monitor, measure, and report on the implementation status of the Climate Action Plan and adapt strategies to reduce greenhouse gas emissions over time.
Too specific: AQ Goal 1. The County will reduce per capita vehicle miles traveled. Implementation Strategy AQ 1.1.1 Encourage new residential development to be within walking distance (1/2 mile or less) to public activity centers such as schools, libraries, parks, and community centers. (E2)

9

Central to achieving every goal here is greater collaboration and cooperation among the many agencies and local community groups that serve our communities, yet its only reflected in a few of the strategies.
Coordination and cooperation all over the world trying some form of nearly every implementation strategy offered here, with varying levels of success. Let's try to learn from what others have already done.

10

Conservation of agricultural resources is addressed in the Agriculture Element, along with the rest of county policies regarding Ag. No policy regarding agriculture should be addressed, discussed or implemented in the COSE. References to agriculture in COSE should directly refer to the AE. Examples of this page 7.2 "Managed production of resources for agricultural lands is addressed in the Agriculture

Element, and outdoor recreation is addressed in the Parks and Recreation Element."
and page 7.9 "Because open space resources do not follow man-made boundaries, they occur on both public and private lands. Therefore, the following goals and policies in this chapter refer to the treatment of open space resources on public lands and on private non-agricultural lands."
and page 10.2: "At the same time, groundwater supplies will need to be protected for agriculture in accordance with the Agriculture Element."

11

1 Humans are not completely independent of the ecological system and we could benefit from integrating humans into the concept of "habitat" instead of viewing "the environment" as something apart and in competition with humans.

2 "Sustaining healthy ecosystems, preserving biodiversity and protecting diverse landscapes ensures a future that is healthy and vibrant ecologically, socially, and economically. Changing land uses, particularly converting of agricultural and rural lands to residential and urban uses, adversely impacts wildlife and native species. Such changes often fragment habitats, reduce biodiversity, increase pollutant loads, and increase flooding." 1.13

12

1 In 1957, Julian Huxley, an English scientist, wrote in a book on morality: Our biggest problem is population. This document does not address that crucial issue, but it should, perhaps here in the general introduction.
Policies are needed because population growth will continue to put pressure on our limited resources and more and more force us to make difficult choices and set priorities that reflect the control we have over our impact on our surroundings.

2 "Sustaining healthy ecosystems, preserving biodiversity and protecting diverse landscapes ensures a future that is healthy and vibrant ecologically, socially, and economically. Changing land uses, particularly converting of agricultural and rural lands to residential and urban uses, adversely impacts wildlife and native species. Such changes often fragment habitats, reduce biodiversity, increase pollutant loads, and increase flooding." 1.13

13

Three "little" Corrections:
The open space chapter addresses issues of special importance to open space and other resources, such as agriculture. pp1.14

"The State standard for particulate matter (PM10) is violated several times through out the year, resulting in the County's nonattainment status with the State's PM10 standard." pp2.3
PM10 is no longer considered an adequate measurement or standard for particulate pollution. Current measurement is PM2.5.

Table at end of Air Quality:
AQ 1.7.3 should be 1.7.2 (Typo?)
AQ 4.2.7 referenced in Table, but not in document.

14

Priority time frames for implementation need to be reviewed for consistency.
AQ 1.7 "Bicycle and pedestrian travel" given "low" priority, whereas AQ 2.2 "Reduce vehicle trips" given "high" priority.
AQ 4.4.4 rated "High." The similar AQ 2.3.1 rated "Medium." Why not consolidate these strategies?
AQ 4.2.6 This "strategy" is similar, or equivalent to AQ 4.2.5 but is regarded as an "essential" priority unlike the "medium" assigned to AQ 4.2.5.

15

Implementation should be more urgently pursued. According to the Carnegie Institution for

Science - February 2009, we are adding carbon to the atmosphere 4 times faster than we did in the 1990's. The current level is "now outside the entire envelope of possibilities that were considered in the 1907 IPCC." (International Panel on Climate Change)

16

1 Great idea: increase bicycle accommodations while reducing vehicle parking.

2 "Install adequate and secure bicycle racks and storage facilities at a ratio of 1 per every 10 vehicle spaces in new commercial and public buildings with a corresponding reduction in required automobile parking spaces. Showers and changing facilities should also be encouraged." 2.9

17

Public transit should be a nominal cost, or free; county funds should not be spent on projects that make driving the easiest of options (program with no plan for implementation.)

18

1 No implementation strategies. Suggested strategy: Model on proposed South Coast Air Quality Management District

2 "Encourage the reduction of heavy-vehicle idling throughout the county."

19

1 This is given a "medium priority and 2010 time frame." Should be "High" and "Immediate."

2 "Prepare and implement a Climate Action Plan to achieve the greenhouse gas emissions reduction target."

20

1 Why isn't this in the Water Chapter? There are no strategies for this very important policy. A stronger tactic than "limit" is needed, given the precarious state of the ocean, due to run-off.

2 *Policy BR 4.7 Contamination from Pesticides*
"Limit contamination from the use of commercial, residential, and public application of pesticides and herbicides into all inland and coastal waters, including but not limited to rivers, streams, wetlands, and intertidal areas. Make exceptions when such application is beneficial to public safety or welfare, or is necessary to protect a crop and is applied in accordance with label directions and permitted by the California Department of Food and Agriculture."

21

1 The wording of the implementation strategies dilute the potential strength of this policy. Why are No Net Loss and Preserve and Conversion all separate policies? Couldn't they be combined into one category with a toolbox of implementation strategies?

2 Goal 5: Wetlands will be preserved.
BR 5.1.2. states "where avoidance of wetlands is not possible require the provision of replacement habitat onsite through restoration and/or habitat creation, provided that no net loss of wetland area, wetland function, and habitat values occurs. When on site wetland mitigation is not feasible, provide for offsite mitigation….is not feasible."

22

1 This paragraph should be removed from the COSE as these practices are specifically addressed in the Ag Element.

2 Policy BR 7.3 Agricultural Best Management Practices
"Support agriculturalists and other landowners that participate in education and assistance

programs and other voluntary and cooperative programs that encourage sustainable land management practices (Best Management Practices) that reduce erosion, sedimentation, and nutrient levels in coastal watersheds."

23

1 Why exempt development? Could contradict some of the uses of public lands in the Open Space chapter.

2 *"Goal CR 4 The County's known and potential archaeological and paleontological resources will be preserved and protected.*
Policy CR 4.1 Non-development Activities
Discourage or avoid activities, other than development, that could damage or destroy archaeological sites, including off-road vehicle use on or adjacent to known sites. Prohibit unauthorized collection of artifacts."
4.10

24

1 Not a good idea. Mitigation of air quality impacts unrealistic. Would generate severe pollution. Contradiction with AQ policies.

2 *Policy E 1.5 Waste burning*
"Encourage waste-burning biomass facilities as a method of producing electrical energy where environmental and air quality impacts can be mitigated and the facility is compatible with adjoining uses."

25

1 Recycling is emphasized and provided for in the county and in the implementation strategies, but using less and wasting less is barely referenced.

2 *Goal E 5 Recycling, waste diversion, and reuse will be increased. 5.15*

26

1 What about industry in the County? Working with businesses (providing incentives) to encourage source reduction and use of recycled materials when possible.

2 *Goal E 5 RECYCLING, WASTE DIVERSION, AND REUSE WILL BE INCREASED.*

27

1 Good idea and necessary.

2 *"Policy E 5.3 Biomass and composting*
Encourage biomass, green waste, and food waste composting facilities (agricultural, residential, food service, commercial, industrial.)" 5.16

28

1 "Reasonably," "mitigate," "avoid" are weak words that underline an intrinsic weak approach to preservation. Consider strength of approach.

2 *"Goal E 7 APPROPRIATE ENERGY FACILITY DESIGN, SITING, AND OPERATION WILL BE ENSURED.*
Implementation Strategy for siting facilities: Employ the best reasonably achievable techniques available to mitigate impacts to environmentally sensitive areas such as wetlands, animal or bird refuges, or habitat of species of special concern. Avoid impacts to habitat of rare, threatened, or endangered species." 5.19

29

SUGGESTION FOR MAJOR CHANGE IN ORGANIZATIONAL STRUCTURE OF THIS CHAPTER

"Goal OS 1 Important open space areas will be identified, protected, sustained, and where necessary, restored and reclaimed.
Goal OS 2 Open space resources will be protected and sustained on public lands.
Goal OS 3 Ongoing public education programs about conservation, protection, and stewardship of open space resources will be encouraged. (OSG 4)
Goal OS 4 Urban sprawl and inappropriate development of rural areas will be prevented."

Goal 1 seems to try to encompass too much.
Goals 2, 3, and 4 are essentially implementations of Goal 1.
A reexamination of this chapter might yield a more clear set of policies that address the stated issues with a toolbox of strategies for expressing those policies. Perhaps this could be organized by ownership category and/or by its designation (recreation, public access, habitat preservation, visual resource preservation, etc)
The main policy seems to be maintaining the open space that does exist and ensuring development is within or contiguous with lands already developed (closed space?). How that policy is implemented depends almost entirely on the property owner. When the lands are not publicly owned, non-ag open space is subject to development standards of the general plan.

30

1 Revision Suggestion
Goal 4 might be better stated: Privately owned open space resources will be protected from destruction of urban sprawl and other inappropriate development. (Since publicly owned space is protected in OS Goal 2)

2 *"Goal OS 4 Urban sprawl and inappropriate development of rural areas will be prevented."*

31

1 This is rated as "High" priority. Should be low. Recreational use of open space, like recreational use of drugs, can be damaging.

2 *"Policy OS 2.11 Recreational use of publicly-owned open space*
Continue to establish and implement policies and management strategies to provide recreational use of open space."
7.21

32

1 Contradictory and dilutes the strength of policies in Air Quality, Open Space and Water Resources

2 *"Policy OS 4.7 Expansion of urban/village areas: location*
*Permit expansion of urban or village areas only where contiguous to an existing urban/village reserve line as shown in Figure OS-3, unless an entirely new urban or village areas is needed in order to direct growth and protect the surrounding rural lands and the rural character of the area."*7.24

33

●The water resources section focuses almost exclusively on supply, as if demand is an unchangeable given.

●This chapter especially calls for cooperation and collaboration between agencies. There is a serious weakness to implementing many of these policies (and there are a lot of them): What if the other agencies refuse to cooperate or enact policies contradictory to those of the County? Clear delineations of the specific authority of agencies over water policies are unlikely to be easy to define. Policies that have no reasonable chance of guiding actions waste time and money.

34

1 more efficient use of our water resources.

2 *"and conserving the water resources we currently use."*
10.2

35

1 Why "especially Agricultural land uses"? Are these more threatened than other beneficial uses? They may be considered more important beneficial uses, but if they are not more threatened, this parenthetical phrase is unnecessary and seems platitudinous.

2 *"Securing adequate water supply for all beneficial uses, especially agricultural land uses, is a priority of the General Plan*." 10.3

36

1 Groundwater is unmonitored and a one-size-fits-all policy may be inappropriate, since some lands with ag uses have riparian rights that already supersede other priorities.

2 "Strategic growth principles call for redirecting development from areas that rely on groundwater to urban areas served by surface water in order to protect groundwater for agriculture."
10.3

37

1 This Goal is too vague to be really useful. Defining "reliable and secure" and appropriate levels of end user consumption must be included for any of these policies to have real meaning.

2 *WR Goal 1 THE COUNTY WILL HAVE A RELIABLE AND SECURE REGIONAL WATER SUPPLY (IRWM). 10.5*

38

1 WR1.2 contradicts WR1.1 (protect water supplies), policies in Air Quality and Energy, not to mention Open Space and Biological Resources. Move this policy down in the order (from 1.2 to 1.14, for example) to reduce its importance. County policy should be: if nothing else can provide reliable water, then desal is ok. If all other additional water sources have been considered and/or put into use (including water efficiencies/reduction and system leak reductions), then support for desal by county.(Water of last resort)

2 *Goal 1 THE COUNTY WILL HAVE A RELIABLE AND SECURE REGIONAL WATER SUPPLY (IRWM). pp10.5*
Policy WR 1.2 Expand desalination opportunities
Support the expansion of desalination opportunities (IRWM). Desalination projects will balance water supply needs with potential effects on biological resources, especially marine resources. Desalination projects will be powered by non-fossil fuel sources where feasible.

39

1 What is meant by "partner"? The North Coast Area Plan requires any desalination project be owned and managed by public agency.

2 *Desalination*
"Implementation Strategy WR 1.2.3 Continue to identify potential partners for desalination projects." 10.6

40

1. Where land is not zoned ag, this makes little or no sense. Where it is zoned for ag, it would be subject to the policies of the Ag element. This doesn't seem appropriate for this element and offers only vague definitions. Is groundwater management a county responsibility or water agencies or state? A balanced approach that recognizes efficiency and reduced withdrawals as beneficial for instream uses . Inconstancies in groundwater management and priority of use to ag, who are often not served by agencies. Costs of groundwater basin studies can be prohibitive.
2. *Policy WR 1.6 Agricultural operations*
   "Groundwater management strategies will give priority to agricultural operations. Protect agricultural water supplies from competition by incompatible development through land use controls." 10.8

41

1. This seems like it would only add to the levels of complexity, additional cost and work for county staff without any measurable added benefit.

2. 'Policy WR 1.11 Impacts of new development Implementation Strategy WR 1.11.2
   Require applications for land divisions that would increase density or intensity in groundwater basins with recommended or certified Levels of Severity II or III (for water supply or water systems) and are not in adjudication to include a water supply assessment (WSA) prepared by a public water supplier (as defined by California Water Code Section 10617). The WSA should:
   a. Determine whether the total projected water supplies for the project during the next 20 years will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural uses.
   b. If water supplies will be insufficient, the WSA should include the water purveyor's plans for acquiring additional water supplies." 10.9

42

1. Cambria's water master plan includes a major contradiction to this policy (i.e. a 50% "quality of life" increase in water use when the desal plant comes online.)
   This is a major contradiction.

2. *"Goal WR 4 Per capita potable water use in the county will decline by 20 percent by 2020."*
   10.15

43

1. A concern raised in communities already facing restrictions: will they be subject to an ADDITIONAL 20% reduction or is the 20% reduction to be calculated based on a county-wide average?

2. *"Goal WR 4 Per capita potable water use in the county will decline by 20 percent by 2020."*
   10.15

44

1. No Implementation strategies.

2. Policy WR 1.13 Avoid net increase in water use
   Avoid a net increase in non-agricultural water use in groundwater basins that are certified as Level of Severity II or III for water supply. Place limitations on further land divisions in these areas until plans are in place and funded to ensure that the safe yield will not be exceeded.

(GM5 revised)

45

1 A countywide ordinance would only add to the incredibly complex maze of water laws with very little benefit.

2 "GROUNDWATER MONITORING AND MANAGEMENT *GOAL 2 THE COUNTY WILL MANAGE GROUNDWATER RESOURCES TO ENSURE SUSTAINABLE SUPPLIES FOR ALL BENEFICIAL USES.*
Develop groundwater management plans for each of the county's groundwater basins and collaborate with overlying users in the development of management plans. "

46

1 Repeated policy (WR 1.4 Interagency projects)
Gathering the current conservation programs of water purveyors might be a good place to start.

2 "Implementation Strategy WR 4.1.3
Evaluate the feasibility of creating a consortium, Joint Powers Authority, Memorandum of Understanding, or other formal partnership with all water purveyors in the county to provide a comprehensive and consistent countywide water conservation program that includes education, outreach, and financial incentives." 10.16

47

1 Good that the County is setting an example. To extract even greater benefit, updates on successes and offering specific strategies or programs that have worked to other government agencies for use.

2 *"Policy WR 4.3*
The County will be a leader in water conservation efforts." 10.16

48

1 Good start, but strategy only includes greywater, not rain catchment, or other systems. Implementation doesn't require reinventing the wheel, but should include cooperation with local water agencies, plumbers, contractors and developers. Incentives for these types of efficiencies.

2 *"Policy WR 4.6 Encourage the use of graywater systems, rainwater catchments, and other water reuse methods in new development and renovation projects, consistent with state and local water quality regulations.*

Implementation Strategy WR 4.6.1
Develop and adopt a graywater ordinance and program to facilitate the reuse of domestic wastewater for onsite irrigation and other water conservation measures as appropriate."
10.17

49

1 "Consider" implies a certain passivity. There are no implementation strategies for this policy. Perhaps identifying specific "trusted" resources for tracking and summary reports scheduled at specific intervals or triggered by specific events.

2 *"Policy WR 5.2 Climate Change*
The County will consider ongoing research on long-term changes in climate and precipitation patterns in the county and region in its approach to managing water resources." 10.19

50

1. Nothing to address sea-level rise flooding threats. that are expected due to effects of climate change

   From THE IMPACTS OF SEA-LEVEL RISE ON THE CALIFORNIA COAST, Pacific Institute March 2009 - Federal flood insurance maps should include information on future flood risks due to sea-level rise. The Federal Emergency Management Agency's official flood insurance studies show hazard zones that reflect past or present flood risks. Because these are the de facto planning documents used by most local governments, they should be updated to show the future hazard areas and include the current science on climate change and sea-level rise.
2. *FLOOD CONTROL GOAL 6 DAMAGE TO LIFE, STRUCTURES AND NATURAL RESOURCES FROM FLOODS WILL BE AVOIDED.*