



39.

Madison Advisory Committee "Making a Commitment"

Date: November 6, 2008

To: Board of Supervisors

Re: Yolo County General Plan

Dear Board of Supervisors,

The Madison Advisory Committee has the following comments on the Yolo County General plan draft.

1. The plan to make Highway 16 a four lane road between I-505 and Esparto could easily result in a traffic jam as vehicles spread out into 4 lanes and then attempt to re-merge. This matter needs to be carefully researched and engineered. With the casino expansion traffic will become heavier and more accidents will occur. This is not adequately addressed. In particular, local traffic needs to be separated from casino traffic.
2. The prison should not be located in Madison. If it is, the general plan needs to be rewritten to address all of the traffic, flooding, and infrastructure problems in Madison and ensure that they are resolved before any prison construction begins.
3. No development of any sort can be allowed without mitigating infrastructure problems including: sidewalks, street lights, sewage/sewers, well, water pipes, water filtration, flooding, park facilities, community center, fire services, police services.
4. There is currently no adequate police protection for Madison.
5. Provided that the amount of land use on the LU-6 map is based only on a percentage of land allocated to each use, the plan is probably acceptable. However, several items will have to be moved, including but not limited to:
 - a. The open space areas in the plan should be moved to place them throughout the housing areas, and not left on the edge of town.
 - b. The downtown area may need to be relocated.
 - c. The high density housing planned near the housing that already exists in Madison needs to be relocated further within the new development and away from the pre-existing houses.
 - d. Side walks
 - e. Parks
 - f. Community services and facilities

Marilyn Gordon
Chair Madison Advisory Committee



November 20, 2008

Yolo County Planning and Public Works Department
David Morrison, Assistant Director – Development Services,
292 W. Beamer Street
Woodland, CA 95695

Dear Mr. Morrison,

As we discussed at our meeting with you in your offices on September 27, 2008, Mariani Nut Company requests that Yolo County re-evaluate the zoning of our almond/walnut processing operation at 30455 County Road 31 (Buckeye processing facility) during the current General Plan Update process.

The General Plan process is currently considering zoning our property at 28301 County Road 90A (505 processing facility) as Agricultural Industrial or Agricultural Commercial. We feel this is the correct designation for the current or intended uses of our 505 processing facility.

The current and intended uses for our Buckeye processing facility are similar to those at the 505 facility. Zoning the property as Agricultural Industrial or Agricultural Commercial would be a more appropriate designation than its current A1 description.

Please let me know what additional information I may provide you to facilitate this request.

Sincerely,

Martin Mariani
Partner
Mariani Nut Company

708 Dutton Street
P.O. Box 809
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www.marianinut.com

David Morrison

From: les mcevers [mcevers530@gmail.com]
Sent: Thursday, November 20, 2008 1:19 PM
To: David Morrison
Subject: general plan

41.

In reference to the proposed highway commercial development on Interstate 505 and Road 14 we would like to list some points as to why this parcel should be chosen over the other site on 12a.

This location is a full interchange.

The proposed improvements to Road 14 from Road 85 to Road 13 will be directly in front of the proposed site.

The possibility of the Re-Entry facility on Interstate 505 will serve the visitors of the facility.

Property is very well drained.

The proposed site on 14 has the support of the Yolo Zamora Advisory Committee whereas the Road 12a site does not.

12A site has no access other than freeway as 12a is gravel on one side of the freeway and narrow county road out to Interstate 5 on the other.

Thank You,
Les and Deborah McEvers

David Morrison

42.

From: Tom McFarling [tmcfarling@callatg.com]
Sent: Monday, October 13, 2008 11:13 AM
To: David Morrison
Subject: Blue Ridge Trail

Dear Mr. Morrison,

I won't be able to attend the meeting in Woodland regarding the Blue Ridge Trail. I wish to express my strongest support for the trail. I often travel to Yolo County to recreate in the Capay Valley area and of course spend my money there on food, lodging, and other things. The trail would be an excellent resource for the county to attract a growing segment of the population who want to hike and explore the outdoors.

Thanks for your support,

Tom McFarling

McFarling Insurance Services
"where service counts"
(707) 994-1430
fax 994-1439

43.

David Morrison

From: David Morrison
Sent: Thursday, December 04, 2008 10:44 AM
To: 'mary mctaggart'
Subject: RE: General Plan Update

Mary,

Good catch. State Route 160 is in Sacramento County, not Yolo County. We'll correct it.

Thank you for the kind words. They are really underserved, but appreciated none-the-less.

David

From: mary mctaggart [mailto:cavelandng@yahoo.com]
Sent: Wednesday, December 03, 2008 6:56 PM
To: David Morrison
Subject: General Plan Update

Dear David,

I was not able to comment on the General Plan Update due to family obligations. However, I noted one thing which someone might want to check out. Several times in the document where county and other roads are the topic, the Plan remarks that "State Highway 160 (South River Road)" runs "south from West Sacramento into Sacramento County at several cross points along the Sacramento River". I don't think this is true, though it may have been sometime in the past. Present highway signs and at least one new resource, Sacramento-San Joaquin Delta Overview, published recently by DWR, distinctly shows on page 12 that State Highway 160 runs south through Sacramento, along Freeport Boulevard and farther along the Sacramento County side of the River until it crosses over to the Yolo County (west) side at the Paintersville Bridge just south of Courtland. I believe it does cross the River again to the east side yet farther south, perhaps at Walnut Grove or Isleton. This language does occur in the Circulation section at Policy CI-1.10, page CI-22, but I think in at least one other place as well.

Thanks for getting back to me about the Winchester Lake issue. I appreciate it as I know you are all terribly busy there and no doubt understaffed as well. I always find you to be a source of great knowledge and possessed of cool and considered counsel - the County is really lucky to have you aboard.

Mary McTaggart



McDonough Holland & Allen PC
Attorneys at Law

44.

Seth Merewitz
Attorney at Law

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smerewitz@mhalaw.com

November 19, 2008

David Morrison, Assistant Director
Yolo County Development Services
Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95695-8728

Re: County of Yolo Draft 2030 Countywide General Plan; 70 Acre Light
Industrial Site in Esparto (APN #s 049-110-18, 19 and 20)

Dear Mr. Morrison:

On behalf of John Deterding Company, I submit the following comments on the Draft 2030 General Plan related to the 70 acre site ("Site"), currently zoned for industrial use on the County's General Plan.

In short, the Draft 2030 General Plan Policy CC-3.13 ("Policy") presents two obstacles for the economic development of the Site: (1) the designation of specific acreages do not provide sufficient flexibility to allow the market to dictate the best use for the Site, and (2) the application of the agricultural buffer policies is not applied equitably to the Site.

Designation of Specific Acreages:

On July 17, 2007 the Yolo County Board of Supervisors instructed staff to "redesignate" this property "for mixed commercial and residential uses" as the Esparto Preferred Alternative in the General Plan Update. However, the draft General Plan designated the Site 10 acres of Commercial General, 35 acres of residential and 35 acres of Open Space. This approach is too rigid and does not fit our expectations or the best interests of the County. The Town of Esparto is a challenging environment for development, regardless of the general economic conditions at the time, which requires flexibility in order to capitalize on economic development opportunities as they become available.

It was our expectation that the Board of Supervisors was interested in providing this Site flexibility, not to reduce the existing industrial/commercial to only a small

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David Morrison
November 19, 2008
Page 2

portion of the Site and make half of the Site open space. Moreover, it was our understanding that the specific allotment to commercial and residential uses would be based on the market demand. However, the "Mixed Use" zoning designation found in the current General Plan has been removed.

We appreciate the need to set out expectations for the landowner and the community, however the benefit of the mixed use approach is that the Site will allow for various uses based on market demand without requiring a general plan amendment. Yet, based on the staff proposal, if an agricultural-related industrial user were to desire 20 acres for a new distribution facility, or, if a high density senior housing facility was proposed that would require 7 acres, the Draft Policy would require a General Plan Amendment. This is not in the best interest of the County in our opinion.

We would request that the Site be designated "Mixed Use" and allow no more than 70% residential uses and no more than 70% commercial/industrial uses, and to comply with all of the adopted policies in the approved 2030 General Plan. This would require adding the Mixed Use designation back into the General Plan, which in this type of situation offers exactly the flexibility that development requires in this type of economic environment.

Agricultural Buffers:

The County has existing policies that require agricultural buffers where agricultural and non-agricultural uses are adjoining (of at least 100 feet for row crops and at least 300 feet for orchard lands) and allows the buffer to be located off-site with the agreement of the adjoining landowner. The existing policies are sufficient to meet the challenges faced at the intersection of agriculture and non-agriculture. To add more restrictive requirements would not serve the economic development opportunities. **Moreover, existing urban zoned land such as this Site should not be impacted by new regulations setting greater expectations for agricultural buffers, as this changes the landowner expectations.**

The Draft General Plan includes policies to (1) develop all buffers within identified community growth boundaries (Policy CC-2.15) and (2) increase the minimum agricultural buffer to 300 feet for all "planned urban growth... where it will permanently adjoin agricultural" and "New Urban Development." See, Policy LU-2.1 and Policy AG-1.8.

Buffers are appropriate and important to both the farmer and the adjacent user. However, there are many situations where the farmer and adjacent user can work



McDonough Holland & Allen PC
Attorneys at Law

David Morrison
November 19, 2008
Page 3

together to provide the required buffer in a cooperative fashion. Why remove this flexibility? We request that you continue to allow buffers to be located off-site with the approval of the adjacent landowner.


Moreover, as staff discussed in the July 17, 2007 staff report, the Site is not a "new development area", as it has been designated for industrial uses for over a decade. To increase the row crop buffer to 300 feet, as set forth in the Draft Policy CC-3.13, would require almost half of the Site designated Open Space and limit the opportunity for needed commercial/industrial development and housing. This is not in the best interests of the County to promote economic development.

Conclusion:

We applaud the County and staff for the Draft 2030 General Plan. It presents many principles and aspirations that can serve as a role model for thoughtful land planning, responding to global climate change and balancing the needs of agriculture and development.

We would request that added mixed use flexibility be restored to the Esparto Site by restoring the "Mixed Use" zoning designation and apply it to this Site, with limitations of no more than 70% residential or commercial/industrial, and that the buffer requirements not serve to halve the development potential of the Site, if arrangements can be worked out with adjoining landowners.

Sincerely,


Seth Merewitz
SM/ws

cc: John Deterding
Heidi Tschudin

David Morrison

45.

From: David Morrison
Sent: Tuesday, December 02, 2008 12:36 PM
To: David Morrison
Subject: FW: Land use changes

From: DandGEMERWIN@aol.com [mailto:DandGEMERWIN@aol.com]
Sent: Thursday, November 27, 2008 10:01 AM
To: David Morrison
Subject: Re: Land use changes

Hi Dave

Thanks for getting back to me. I am sure you took it as a slam against you and Heidi. That was my fault and I am sorry for that. I overreacted. I was also very vague which was also a bad thing. I apologize for both of my shortcomings. That was not my intent.

My frustration is with Yolo County itself and they just can't get away from lumping us in with the rest of the County. Obviously I can't speak for farmers in the rest of the county. I do however feel I know my neighbors extremely well.

I don't know a single farmer in Clarksburg that agrees with Action CC-A28

Size of the home. We should be able to build any size home we want. It penalizes success. It lowers property values which are the backbone of securing working capital to get through the lean years of farming. I know a couple of farmers right now that if this is implemented might get cut off from the bank loan almost immediately. Their equity line of credit is equal to a percentage of their equity. DUH!

Location of the Home. Ditto above and now the county is going to tell us the best way to farm around improvements on our property. Let farmers farm. This area has had the most success with permanent crops and with drip irrigation has little or no bearing on where we place a home. It would most likely make farm homeowners be more aware of how their operation is affecting surrounding home owners.

Stewardship plan. The county knows more about farming than farmers do? Should we have a plan for how a car dealership is run? How about a carwash? What is required if things change and instead of planting cherries we want to plant wine grapes? Do we have to go through a review board and get permission? I am sorry but that is big brother. If there is a choice on buying a farm that a county has implemented this and another county does not it would make the other more attractive. Again lowering our values! Is the county trying to make the argument when property sells in Yolo county it has more restrictions so it has less value? Sells for a lesser price. Lowering the county's tax revenue.

Placement of the remainder of property in an easement. This just permanently ties the hands of the owner and the flexibility of the county. An easement literally means giving up some rights and control over your own property. It is a form of socialism. Permanently reduces property value.

Home site less than 20 acres require a use permit. The most frequent comment among farmers is Clarksburg is ridiculous.

If you look at this entire section of Action CC-A 28 it is terrible for Clarksburg. We need help in creating value in our properties to hang on to the asset values to have the equity basis to make improvements (like plant vineyards). What this does do is make it easier for big 5,000-12,000 acre wine grape growers from outside our area come in here, buy larger blocks of ground cheaper and rape all the revenue out of our community. That is what has been happening! The county has been told this. But they just chose to treat us like the rest of the county. These big growers come in buy all the infrastructure, stakes, wire, drip systems pick-ups, tractors everything in another county. They keep all that mobile equipment in another county. Bring in all the labor that

lives in neighboring counties and they go home and spend all that money in their home county. This entire section is bad for Yolo County. It is disastrous for Clarksburg. The Clarksburg community includes the outskirts of the town. This separates the town from the agricultural district. That is the direction the farmers in this area are being pushed.

I feel that the planning department listens and even gets it. But the Board of Supervisors doesn't get it as a whole. Mike does. Maybe a couple others do occasionally. But the bottom line is the Board of Supervisors ends up doing what the city of Davis wants. How sad is that. I bet the majority of the people that live in Davis could not tell you where Clarksburg is.

Thanks for listening Dave. Was I specific enough?

Gary Merwin

Life should be easier. So should your homepage. Try the NEW.AOL.com.

From: Vicki Murphy [mailto:murphyranch@gvnl.com]
Sent: Monday, October 27, 2008 12:59 PM
To: David Morrison
Cc: Duane Chamberlain; Matt Rexroad; Mariko Yamada; Helen Thomson; Mike McGowan
Subject: YOLO COUNTY GENERAL PLAN COMMENTS

DATE: OCTOBER 27, 2008
TO: DAVID MORRISON, YOLO COUNTY PLANNING DEPARTMENT
and the YOLO COUNTY BOARD OF SUPERVISORS
FROM: BOB AND VICKI MURPHY
RE: YOLO COUNTY GENERAL PLAN

Dear David and Members of the Board of Supervisors:
Here are some of our questions and concerns regarding the Yolo County General Plan. We would appreciate your responses to be inserted under our comments to make sure that our communications are clear and responded to, so we can determine how these new mandates will affect our property and our lives. The areas of concern have been identified for your convenient reference, also.

Action CI- A3 (35) , Update the bicycle Transportation Plan, including potential routes along levees, abandoned railroads, waterways and transmission rights of way. **Will private property continue to be respected? Who will be patrolling these new routes? Who will be maintaining them? Where will the money come from to acquire and develop these routes? There should be no expansion of things of this nature unless there is also maintenance and assurance of public safety.**

Action CI-A7 (35) Develop and maintain a priority program to construct bikeways, especially off-road bikeways, in conjunction with roadway projects, consistent with the county's Bicycle Transportation Plan.
Bike owners should begin paying the fees to carry the burden of Yolo County's new very expansive bikeway plans, because bike registrations should help fund their bike paths. Children's bikes should not require registration, but all skinny-tired, 'geared' bikes should be.

Page AG-16 (e) Yolo County Farmland conversion Mitigation Program
Through its Ag Land Conversion Ordinance, Yolo County requires 1:1 acres for mitigation when farmland is converted to non-agricultural uses for development purposes.
The original HCP mitigation was not to be this high.

Page AG 24 AG3.5 Encourage the provision of farm worker housing by streamlining permit requirements, reducing fees and requiring exclusionary housing within established communities

This shows a bias against families staying on their property. Why wouldn't family members who build a house on their land also be given the same consideration as "farm workers"? There is such a major, unfair bias against family homesites.

Page AG 27 AG-5.6 Encourage Institutions, such as schools, hospitals, colleges, government agencies, businesses and private food outlets such as grocery stores and restaurants, to provide foods produced locally and in the region.

Will the first word, 'encourage' soon become 'policy or action'? Costs to the business owner and the competition in the free marketplace must be respected. Taxes will unnecessarily increase if say, organic produce becomes 'policy or action'. Production agriculture has always provided abundant, affordable, safe, healthy foods for our nation.

Page AG- 27-33 Agricultural Mitigation Ordinance

Negotiate cooperative agreements with neighboring jurisdictions to allow their agricultural mitigation requirements to be satisfied in appropriate locations with Yolo County. Agreements shall consider compensation to Yolo County for lost tax revenues and economic opportunity costs. **What exactly are "neighboring jurisdictions"? Mitigation from other counties? What about compensation from non-profits for taking our tax revenues?**

AG-A6: Develop specific criteria regarding the location and/or placement of homesites on agriculturally designated land to ensure compatibility with both on-site and surrounding agricultural uses. **This is of major concern...exactly who is going to be making up the 'specific criteria'?**

Size of the home The County CANNOT be serious about this. Soon, those with a big house will have to saw some of it off? Or be forced to house other people? Please remove this from the document.

Location of the home. It is impossible to put such a cookie cutter mandate on agricultural lands. Every parcel in the rural landscape is different, many parcels containing numerous soil types. What if the water source is on the back of the property and 'specific criteria' mandating the location of the home requires pumping the water long distances or drilling a new well? What if the Class I soil is on the front corners? What if 'specific criteria' places the homesite in a low spot that floods? Will the homeowner then have to raise up his house plans, buy flood insurance, etc? Where a landowner wishes to build on his property should remain his own business. This should be removed from the document.

Approval of a stewardship plan demonstration how the property will be farmed Every landowner will have to have and pay for this stewardship plan? What would such a plan entail? Is this designed for the County to dictate what crops will be planted, when to be planted and even, or if crops are planted at all?

Placement of the remainder of the property, outside of any home site, in a permanent agricultural conservation easements, deed restriction or similar instrument. **What do you mean by 'remainder of the property'? We have some parcels that are 350 acres....And David Morrison said that the Williamson Act does not suffice as an agricultural easement in this case... Please advise.**

Recordation of a deed notice acknowledging the potential for nuisances to occur, such as dust, agricultural chemical application. **This is good...it protects ag activities**

Recordation of a deed notice acknowledging the County right to farm ordinance
Ag-A20 Create an Agricultural Permit Coordinator position (farmsbudsman) to assist farmers and ranchers with the permitting process **Supporting right to farm is good but creating another mandate in the ever-growing Yolo bureaucracy is not necessary. This item clearly defines exactly why how much a simplification utilizing land use is called for. Just look back at the above 'actioned' segments that are poised to be implemented, and they have not been reasoned through to the end results. Policies and actions should be thoroughly vetted and not just introduced and then implemented.**

AG-A21: Develop a grading ordinance to maintain natural terrain, drainage and vegetation to the extent possible to minimize the disruption of natural systems.
How will this apply regarding the 750,000 cubic square yards of soil coming from Tribal land to neighboring fee simple land? Vicki was told that it would be just the same as a farmer leveling their land. (We would appreciate the opportunity to level off some of our hills and create some sloping flat land in order to gravity irrigate). And what about the Oak Tree ordinance and the removal of a score of valley oaks?
Question: What is the CEQA requirement for this dirt movement and placement?
Question: Is the Capay Valley's G. Plan development freeze frame actually the mitigation requirement for development impacts from the Casino?

AG-A27 Implement a voluntary Agricultural Transfer of Development Rights (TDR) program to facilitate the creation of affordable farm worker housing. **This is another example of introducing a very complex application without any description, any vetting and no vision for what will occur. Please explain how this will benefit landowners.**

CO-1 Conservation and Open Space Element. **This section takes complete control over private property. Nowhere in this General Plan document are the rights to private property 'protected'. Certainly, private property is mentioned, but only in the context of being part of the county's overall open spaces.**

CO-6 Large open space areas on Yolo County are owned and managed by a variety of entities including federal, State and local government, and private interests. Publicly-owned lands account for approximately six percent of the county land area. (There are)...Large properties under public ownership and/or management in Yolo County...

And, there is NO funding for maintenance on these government-owned properties...they are neglected, and the tax revenue is removed when park status is realized.

CO-51 Table CO-6 Water System condition by unincorporated area...The inclusion of and impact of the Casino water system on Yolo County is missing! There must be some mention of the impact of that water system on the Capay Valley aquifer, as well taking into consideration of the fact that the Casino is expanding. Will the expansion impacts be addressed and included in this document?

CO-55 Implementation Program (Water Resources) Most Actions regarding information and implementation (Co-A62 to CO-A93) are already available through YCFCWCD and from Joe Scalmanini. A new county-wide water authority is not necessary. The original Yolo County Ground Water Ordinance that was shredded and shelved should stay that way.

CO-68 Greenhouse gases...Yolo County is over 94% agriculture. Unless you focus on the urban and casino areas, Yolo County cleans up more GHGs than almost any central California county, making stringent actions and plans to reduce GHG unnecessary. Farmers and ranchers should instead be recognized and congratulated for providing huge carbon credits that come from our farmlands and rangelands. Why are those in the rural areas going to be punished for providing it?

IIS-A1 Require a geotechnical analysis for construction in areas with potential geological hazards and/or for purposes of environmental analysis. This is a huge cost to landowners. What is the present earthquake requirements? These additional mandates appear to be just a new found source of revenue.

IIS-A19 Setback levees take agricultural land away. What is the compensation here for the landowner for the loss of productivity, and the loss of his Class 1 soils when they are scraped off the top of his farmland to create levees?

HS-A21 Ensure that the upgrade, expansion, or construction of any flood control levee demonstrates that it will not adversely divert flood water or increase flooding. This section should also include the damage potential to neighbors when environmental organizations create berms. Those kind of neighboring water impoundments impact agricultural activities by trapping water onto farm land longer by impeding natural runoff.

HO-61 Habitat Mitigation: The ordinance establishes qualifying criteria for mitigation lands: The mitigation land must be located within Yolo County and 2 miles of the land to be converted...Mitigation more than 4 miles from the project site may only occur by approval of the BOS...This is forcing landowners to have non-profit or government partnership on their farms and ranches! What was the HCP created to do?

Back of the book, page 25 regarding Capay Valley Regional agricultural viability: **All new development throughout the document keeps rural areas in small scale, low-income enterprises. Rural residents are not able to provide up-scale development, like the landowners in the Napa Valley. Why not?**

We very much look forward to and appreciate your responses.

Sincerely,

Bob and Vicki Murphy
murphyranch@gvni.com
(530) 796-3752



47.

November 20, 2008

Honorable Duane Chamberlain, Chairman
Board of Supervisors
County of Yolo

RE: General Plan Update, Selection of Draft Plan

Dear Members of the Board of Supervisors:

The North Davis Land Company (NDLC) has been following with great interest the progression of Yolo County's General Plan Update process. Our site, formerly known as Covell Village, is referenced in Chapter 3, under Policy LU-6.11. f, on page LU-22. The site is north of Covell Blvd., west of Pole Line Road, and east of the Hunt-Wesson site. We feel that this site has many attributes and assets to Yolo County and the City of Davis that reach far beyond it's current zoning of Limited Industrial.

NDLC requests a change to the language of Policy LU-6.11.f to read:
"Innovative housing and mixed use opportunities with an emphasis on seniors that meets internal demand at Covell Blvd./Pole Line Road and coordinated planning with the Hunt-Wesson site."

Reasons for this requested modification are as follows:

- 1) On June 23, 2008, the Yolo County LAFCO adopted an update to the Sphere of Influence (SOI) for the City of Davis and established the Covell site in the 10-year SOI category.
- 2) NDLC is in support of the county and the City of Davis exploring mutual opportunities, including coordinated planning with the Hunt Wesson site. This will ensure a well-designed, comprehensive plan that will meet the many housing and business needs of Davis for the next 20-30 years.
- 3) This site meets the overarching goals and principles identified by the HESC. It is especially suited to support a concept for an innovative neighborhood community with an emphasis on seniors. The site's key attributes include convenient shopping by means of the Nugget Market and Longs Drugs shopping center, connectivity by virtue of networks of greenbelts, easy access to public transit and ideal location along the city's principal east-west arterial route. (see exhibit 1)
- 4) The Covell site is in a unique position to fulfill city and county sustainable land use goals. There is an opportunity to restore habitat along Channel A that bridges the existing habitats and greenbelts at North Davis Ponds and the Wildhorse greenbelt/ag buffer. In addition, this amenity enables the extension of braids of habitat south to Covell Blvd., that interweave and connect micro-neighborhoods. This integration of habitat/greenbelts and housing will further contribute to sustainable land use practices by managing storm water drainage on site and encouraging alternative transportation uses.

Citizen-Based / Community-Driven Concept

In an effort to understand the internal demand of the Davis senior community, NDLC has been conducting outreach meetings for over a year. To date, we have met with well over 500 community members in small group outreach discussions. These meetings have allowed us to gain a better understanding of what today's seniors are looking for as they plan for their future.

What we have learned:

1) As communities across America grow older, city governments must identify and seize opportunities to create high-quality housing communities for senior citizens who are living longer and more productive lives. That need is particularly true in Davis.

More than 4,000 single-family homes are owned and occupied by seniors in Davis. Many of these seniors are looking for better housing alternatives. Davis seniors comprise 20 to 30 percent of the city's population.

Most of these people have lived in their Davis homes for decades. These citizens are looking for better choices and solutions to downsize while they maintain their quality of life. In addition to attending our outreach discussions, Davis seniors have voiced their desire at numerous public hearings for a broad variety of housing choices and neighborhood amenities that currently do not exist in Davis.

2) There is also a growing recognition that the solutions of the past, many of them institutional, are no longer acceptable. We need 21st century solutions to meet the financial, health, wellness, and social needs of today's seniors. This paradigm shift will require a visionary commitment from the county, the Davis City Council, planning staff and from those of us willing to carry out the vision with innovation, environmental sensitivity, and smart design.

3) A top priority for all planning should be to add value to the entire community. The creation of new, more acceptable options for Davis seniors to downsize and age in their own community would benefit not only our growing senior population, but also our community as a whole. These benefits include:

a) A resetting of property taxes for the existing homes that seniors will vacate would benefit city and county coffers.

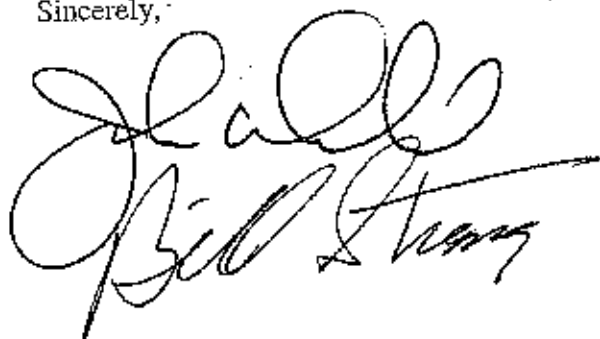
b) Housing for health care workers, caregivers, and those with special needs should not be overlooked and should be included a comprehensive neighborhood community that emphasizes seniors.

c) A well-designed, comprehensive, senior-friendly project with service consolidation would greatly reduce budgetary demands city and county wide. This consolidation of services (such as health, financial, and social services) would provide more effective delivery, improvements in access, greater quality of service and reduced costs.

d) On-site medical facilities, a continuum of care and land dedicated for emergency medical services (EMS) will benefit the entire community. In addition, it will address the needs of those areas in North Davis that are currently outside the 5-minute response time of the existing fire stations.

Thank you for considering our comments for the Yolo County Draft Program Environmental Impact Report. If you have any questions or would like further information, please contact Lydia Delis-Schlosser at shredmama@comcast.net, or call (530) 574-8013.

Sincerely,

A handwritten signature in black ink, appearing to read "John Whitcombe and Bill Streng". The signature is written in a cursive, flowing style with large loops and a long horizontal stroke at the end.

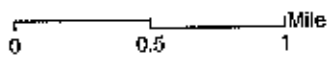
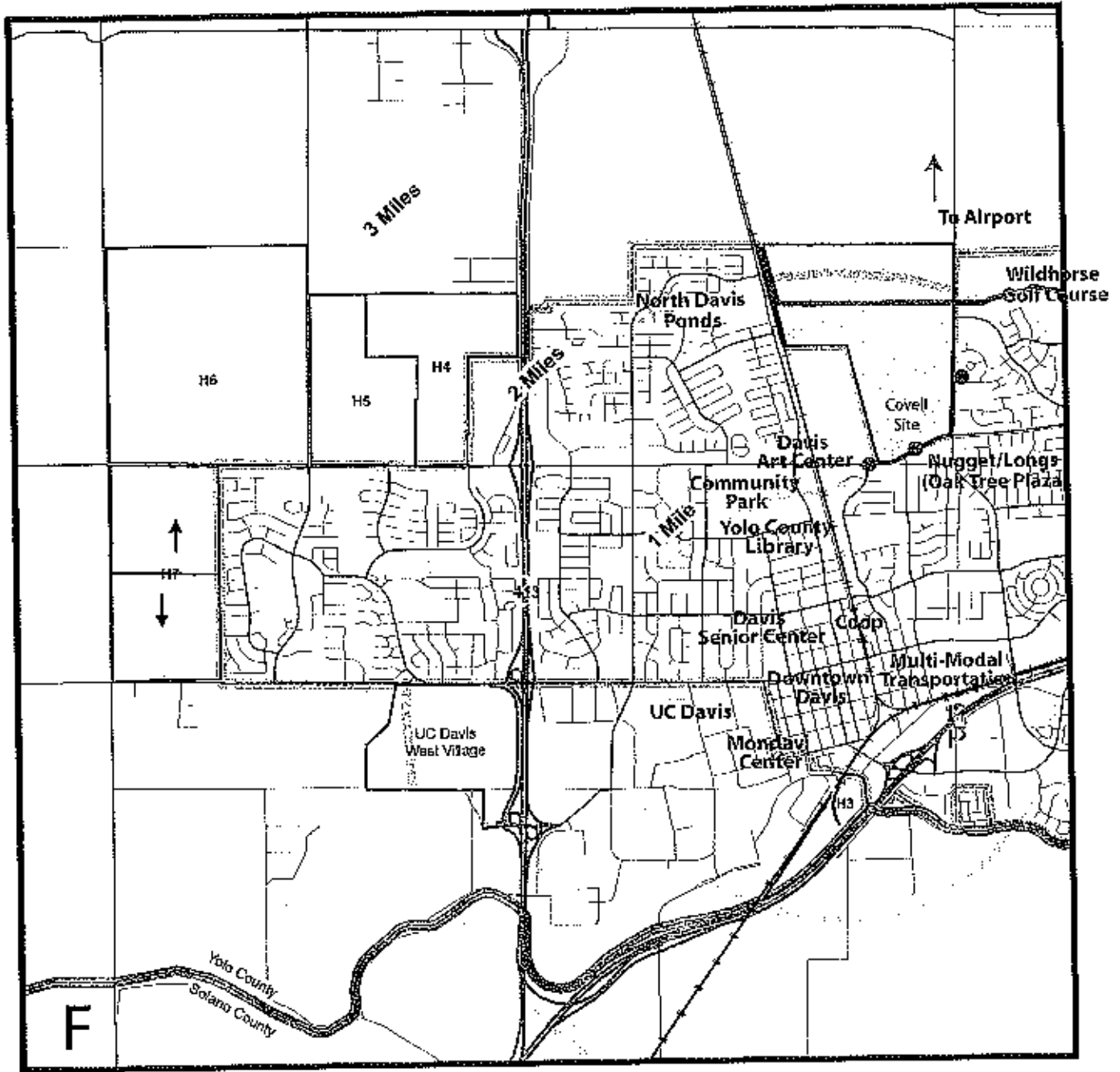
John Whitcombe and Bill Streng
North Davis Land Company

cc.

*Davis City Council Members: Mayor Ruth Asmundson, Mayor Pro Tempore Don Saylor, Stephen Souza,
Lamar Haystack, Sue Greenwald*

*Davis City Staff: Bill Emlen-City Manager, Katherine Hess-Community Development Director,
Bob Wolcott-Principal Planner*

Exhibit 1
 North Davis Land Company
 Covell Site Proximity



● Existing Bus Stops

11-20-08 LD

David Morrison

48.

From: Ronald Oertel [roertel@msn.com]
Sent: Friday, October 17, 2008 9:59 PM
To: David Morrison
Subject: We support Blue Ridge Trail

Mr. Morrison:

Just wanted to let you know that we strongly support the expansion of the Blue Ridge Trail. The recreational opportunities offered by our close neighbor (the Vaca range) are going to become more important to all citizens as our communities become larger. There is a definite shortage of public access points to this mountain range, which ironically holds vast tracts of publically-owned land. Please do everything in your power to ensure greater access to these lands, especially for low-impact, healthful activities such as hiking.

Sincerely,

Ronald Oertel
Somklat Ashton
2211 Somerset Circle
Woodland, CA 95776

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David Morrison

49.

From: Orlove, Ben [bsorlove@ucdavis.edu]
Sent: Monday, October 13, 2008 12:22 PM
To: David Morrison
Subject: Blue Ridge Trail

Dear Dave,

I'm writing to send my strong support for Yolo County completing the Blue Ridge Trail all the way from Cache Creek to Putah Creek. The wild lands in the western part of our county are a precious resource, one that is of great value now and that will be of even greater value as populations grow in California. It's part of the heritage of our area.

I've taken my children hiking in portions of the Blue Ridge, and I hope that they take their children there as well. Protecting these lands and extending the Blue Ridge Trail is the best way to do that.

all best,

Ben Orlove
530 756 8239

David Morrison

So.

From: Mark Pruner [mark@markpruner.com]
Sent: Thursday, November 13, 2008 8:14 AM
To: David Morrison
Cc: mark@markpruner.com; 'V Pruner'; Mike McGowan; Gail Klauer
Subject: Request to retain Yolo General Plan designation for certain property in Clarksburg

David, my wife and I own a historically commercial and multi-residential parcel located at 52925 through 52937 Clarksburg Avenue in Clarksburg. This parcel is located one parcel east of North School Street, on the south side of the street, and faces across the street a line of commercial property.

The current general plan designation for this parcel is commercial. We request that the new Yolo County General Plan retain the current designation for this parcel.

The proposed general plan change would create an inconsistency with both the historic, and the current, legal uses located on this parcel.

Will you return the designation for this parcel to its current designation?

Please let me know if you have any questions. Mark

Mark Pruner
P. O. Box 3
Clarksburg, CA 95612
Cell: (916) 204-9097
Work: (916) 447-1121
Facsimile: (916) 447-9661

December 15, 2008

20872 Co. Rd. 99
Woodland, CA 95695

Yolo County Planning Dept.

Re: General Plan Ag & Economic Development Element

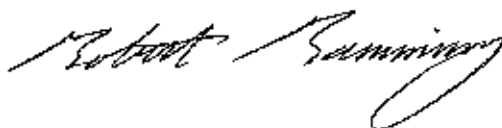
I believe the General Plan Ag & Econ. Dev. Element should specifically recognize retail farming at the cities' edges as an important future segment of our agriculture and local economies. We're going to need lots of them in the future. There can be many benefits to this type of business (carbon footprint, transportation, packaging, local economic impact, robust food supply, energy conservation/production, food security, open space, etc).

Under Goal AG-5 (Local Preference), I'd like to see a "Policy AG-5x":
"Promote, encourage and support diversified farms very close to the urban edges which could provide "ultra-local" food to nearby neighborhoods."

As for "Action AG-Axx" measures, such a policy could be supported by actions AG-A1, A9, A13, A14, A15, A16, A17, A18, A19, A20 and A22. Perhaps the wording of these action measures could be refined to include support for such "Integrated Retail Farms At City's Edge". (Okay, so now we have a snazzy acronym - "Interface" - one less promotional/educational chore to do).

Thanks for your consideration.

Sincerely,



Robert Ramming
Pacific Star Gardens
(530) 666-4686

David Morrison

From: Georgene Redmann [GMRedmann@comcast.net]
Sent: Sunday, October 12, 2008 2:57 PM
To: David Morrison
Subject: Blue Ridge Trail

53.

Dear David,

Unfortunately, I have another commitment for the meeting tomorrow night regarding the Open Space Element. In the last couple of years I have been really fortunate to be able to take part in some of the wonderful hikes put on by YoloHiker. I have been hiking for quite a few years and had no idea that we had an area to hike that was so nice and so convenient. I have added quite a few of my friends to the hiking group and we all agree it is a wonderful contribution to our area. We were so pleased to read that a very generous farmer has donated a trail easement so that the 38 mile ridge trail can be completed for hiking. It would be really disappointing to hear that the Open Space Element would be adjusted and the completion of the Blue Ridge Trail taken out of our General Plan. This is such a great opportunity to continue to expand opportunities for the citizens of Yolo County and others, as we have people who come from the Bay area, in getting out and exercising and appreciating the many views in our area. Please keep this element in the plan. As it adds a richness to our community.

Sincerely,

Georgene Redmann

54.

David Morrison

From: Mary Reid [mmreid@pacbell.net]
Sent: Monday, October 13, 2008 9:22 AM
To: David Morrison
Subject: Support to complete the Blue Ridge Trail

Hello,

I am writing to express my support for the County working to complete the Blue Ridge Trail from Cache Creek to Putah Creek, along the Yolo County line.

Sincerely,

Mary Reid

55.

David Morrison

From: Julie Rose [julieski@earthlink.net]
Sent: Monday, October 13, 2008 7:06 PM
To: David Morrison
Subject: Blue Ridge Trail

Dear Mr. Morrison,

I am a Brooks resident who is writing to express support for the County to create the Blue Ridge Hiking Trail from Cache Creek to Putah Creek. What a wonderful addition to the General Plan this will be. I am an avid hiker, and participate in Girl Scouts. I am willing to volunteer my time and the time of my high school girls to help build this trail.

Sincerely,

Julie Rose
(530) 79- 3437
18265 Co. Rd. 70
Brooks, CA 95606



Rumsey Indian Rancheria

56.

YOCHA-DE-HE

November 20, 2008

*Rumsey Band of
Wintun Indians*

TRIBAL COUNCIL

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Cynthia Clarke
Council Member

VIA ELECTRONIC MAIL AND U.S. MAIL

Yolo County Planning and Public Works Department
Attn: David Morrison, Assistant Director
Development Services
292 West Beamer Street
Woodland, CA 95695

RE: Comments Concerning Yolo County Draft General Plan Update

Dear Mr. Morrison:

The Rumsey Band of Wintun Indians, hereinafter the Tribe, has reviewed Yolo County's Draft General Plan Update. Thank you very much for the opportunity to comment. The Tribe commends the County for producing a document that strives to find policies to achieve balance between economic vitality and limited development. By and large, the document represents a progressive vision for the future of the County and for the Capay Valley. However, the Tribe has many concerns about the draft and how it portrays the Tribe and its enterprises. To the extent the Tribe and the County are able to cooperatively modify the following sections; the resulting document will foster a mutually beneficial working relationship.

The majority of the document appears thoughtfully crafted and the Tribe believes that the Land Use Element contains helpful clarifications and policies. For instance, by consolidating land use designation in Table LU-1, the County will streamline the land use process and allow for the necessary flexibility to respond to changes in the market. Of particular note is the County's development of Goal LU-6. The Tribe feels that this goal represents a commitment to ensuring inclusion, fair treatment, and equitable outcomes between the County and other local government entities. This is an important goal and the County is setting the foundation for cooperation and an environment of mutual respect. Similarly, Policy LU-6.1, which promotes continued strong working relationships with the Tribe, will help to ensure that both the County and the Tribe find a way to produce an economic

environment that is mutually beneficial. Recognizing the outstanding work done to produce this draft, the Tribe would like to submit our comments for changes on the following:

Lack of Recognition for the Rural Community of Brooks:

Yolo County Economic Development Initiative #10 states, “[l]ike Esparto, Capay and Brooks also have limited commercial development potential, driven by the Casino expansion.” Here the County recognized that there is a rural community in Brooks that is separate and distinct from the Casino and Tribal lands. To this point, the Draft General Plan Update identifies Brooks on all maps. Yet, beginning in the Land Use Element, and continuing throughout the remainder of the document, the County fails to list Brooks as a community in a single table or policy of consequence.

Assuming that there is indeed a community of Brooks that is geographically distinguishable from the Casino Resort and from the tribal housing and government center, then it should be identified as a rural community throughout the document and its current growth boundary should be depicted in the appropriate sections of the General Plan and specifically Figure LU-1C. This change would keep with the major theme of the Land Use Element, which states at the outset that “[g]rowth boundaries have been established for every community...” (p.LU-1 and LU-9), and the Housing Element, which states, “the Land Use Diagram in the Land Use and Community Character Element identifies growth boundaries for each of the unincorporated communities” (p.HO-61).

In addition, the Tribe requests that Brooks, or at a minimum the Capay Valley, be listed in Agriculture and Economic Development Policy ED-4.10. The policy states, “[s]upport the development of tourist services along... State Route 16 (Madison, Esparto).” This language distinctly omits the tourism service location that is nearest the site of the County’s largest private employer, in addition to ignoring the dozens of farms in the Capay Valley that may benefit from agricultural tourism.

Lastly, recognizing Brooks as a distinct community will help achieve several goals of the Housing Element. Housing Element Policy HO-4.10 seeks to expand housing opportunities for farm workers. Identifying Brooks as a community will increase the locations available to farm worker housing in the Capay Valley by recognizing additional area within a growth boundary. Housing Element Policy HO-6.1 encourages site and building design that conserve natural resources. Brooks is the closest community to many jobs in the area and designating its growth boundary in the General Plan may provide housing sites that conserve the most natural resources due to their proximity to jobs. Similarly, Housing Element Policy HO-6.2 seeks to minimize greenhouse gas emissions by locating housing near employment centers. Recognizing Brooks as a distinct community the County will allow the potential for housing to be located near the County’s largest private employment center, thereby reducing the greenhouse gas emissions associated with commute traffic. In a related measure, Housing

Element Action HO-A17, seeks to locate work force housing in communities along transit routes. Brooks borders State Route 16 and, if recognized as a community, would help satisfy this action. Lastly, in addition to Esparto and Madison, the County should recognize Brooks in Housing Element Policy HO-1.9, allowing workforce housing in the rural community closest to the location of many jobs. Only by recognizing Brooks as a community will the County be able to utilize the town to efficiently locate smart growth housing and develop viable rural commercial centers, thereby increasing standards of living, decreasing environmental consequences, and minimizing the impact of residential traffic on State Route 16.

Land Use Element Policy LU-2.1 & Agriculture and Economic Development Element Policy AG-1.8:

Policy AG-1.8 requires a development setback of 300 feet from surrounding agricultural uses along the border of a community growth boundary. However, in many cases the rural communities have very little land designated within a growth boundary. (See Figure LU-1C for Rumsey) Where the growth boundary is near or less than 600 feet wide in any direction, the agricultural buffer setback under this policy will occupy the entire growth boundary. As a result, small communities will be prohibited from developing what little land is designated as non-agricultural. For instance, in the rural community of Rumsey, the County has designated a small strip of Commercial General and two small portions of Public/Quasi-public space. All of these are less than 300 feet wide and are surrounded by land zoned Agriculture. Under Policies LU-2.1 and AG-1.8, neither the Commercial General or Public/Quasi-public areas may be developed. This then begs the question: Why are zones are designated at all? This problem is not unique to the town of Rumsey. Guinda and Capay also will have significant portions of their growth boundary eliminated. If the County wishes to provide for permanent buffer zones between non-agriculture development within a growth boundary and the surrounding agricultural lands, the General Plan should reflect large enough growth boundaries so that some development may occur. Otherwise, the growth boundary is erroneous and should be removed completely to reflect accurately the County's desire to prohibit growth in that area.

Land Use Element Policy LU-6.10:

Taking at face value policy LU-6.9, in which the County states its intentions to secure community benefits beyond those strictly needed to address project impacts, the Tribe would like to suggest changing the language within Policy LU-6.10 to substitute the phrase "other jurisdictions" for the word "cities". The Tribe agrees with the principle of mutually beneficial revenue generating land uses expressed in policy LU-6.10. By modifying the language of this policy, the County will commit to seeking mutually beneficial arrangements with a broader range of jurisdictions than simply cities. Such a change would foster the spirit of cooperation necessary to fully realize Policy LU-6.9 and would lead to more productive "net benefits" for all involved. This change would benefit many jurisdictions, not the least of which is the County's school districts.

Circulation Element Policy CI-3.1, Action CI-A13:

The Tribe is committed to working cooperatively with the County in mitigating impacts caused by the Tribe's gaming operation. To that end, and pursuant to an Intergovernmental Agreement entered into by the Tribe and County in 2002, the Tribe agreed to pay its fair share of the cost of traffic improvements that are needed on State Route 16 and certain roadways as a result of traffic impacts created by the Tribe's then planned expansion of its gaming operation. The Tribe has constructed most of those improvements and, in August 2006, the County approved the balance of the Tribe's traffic mitigation plan, which will be implemented as soon as final approval is secured from Caltrans. The Tribe has committed funds that constitute its fair share for the cost of those improvements.

However, the language in the County's document creates the impression that the Tribe is responsible for most of the costs for traffic improvements to State Route 16, on an ongoing basis, and regardless of the land use that triggered the need for those improvements. The language in the policy should be clarified to be consistent with both the Tribe's obligations under the Intergovernmental Agreement, as well as the Tribe's publicly stated willingness to pay its fair share for traffic improvements needed to mitigate impacts attributable to any future expansion of its gaming operation.

The language in the Circulation Element Policy CI-3.1 is also inconsistent with Caltrans' plans for State Route 16, between County Road 21A and Interstate 505. Specifically, the County's policy calls for the construction of four lanes on State Route 16. However, the County's policy should be consistent with the plans of the agency with jurisdiction over the highway.

Similarly, Action CI-A13 seems to indicate that the Tribe will fund any necessary improvement to State Route 16 needed to maintain the identified LOS, regardless of the cause of the needed improvement. While the Tribe is willing to working cooperatively with the County to ensure adequate infrastructure and a mutually beneficial economic environment, the Tribe suggests changing the language of this action to better reflect the cooperative nature of the Tribe's and County's relationship. We suggest, "Work with Caltrans and the Rumsey Band of Wintun Indians to discuss a mechanism by which they could contribute their respective fair share of funds necessary to complete improvements to State Route 16 that would maintain the identified Levels of Service for each roadway segment."

Agriculture and Economic Development Element Section B.1.e.i. *Transportation:*

The County has erroneously stated that the reason the County's roads are in poor condition is due to the activities of the Casino Resort. This is neither accurate nor supported by any evidence. County roads are heavily used by a multitude of vehicles, not the least of which is commercial in nature and independent of the Casino Resort. Additionally, as recognized by County staff, natural erosion and runoff from the surrounding lands has degraded the

shoulders of many roads, contributing to their poor condition. The Tribe would like this reference to the Casino removed from the General Plan.

Conservation and Open Space Element:

The Tribe applauds the County's effort to include many of the policy recommendations that it suggested after our last consultation regarding cultural resource protection. The following outlines some additional issues identified in the draft:

Conservation and Open Space Element Section C. *Natural Open Space*, 1. Background Information:

This section states, "Additional public and quasi-public landowners include non-profit organizations, *tribal groups* and non-County public agencies, including the incorporated cities, the University of California, the State and federal governments." Even though the Rumsey Band of Wintun Indians is the only tribe physically located in Yolo County and the only tribe holding fee title to a great deal of open space lands within the County borders, the Rumsey Band of Wintun Indians is not specifically named. "Tribal groups" is vague and does not help the reader to know what tribes they should work with or be in contact with if they desire to use these lands or seek to dedicate open space to protect cultural resources or sacred sites. We suggest adding specific reference to the Tribe with a recommendation to contact the Rumsey Band of Wintun Indians Tribal Chairman if there are questions or concerns regarding the Tribe's open space fee lands that are held under a permanent conservation easement. We can provide information about the total acreage of open space and conservation lands owned by the Tribe should the County choose to include such data.

Conservation and Open Space Element Policy CO-1.21:

CO-1.21 provides that the County will, "Encourage the Bureau of the Interior and/or the General Services Administration to transfer the site of DQ University to County ownership, should it no longer be used for tribal education." We believe that this policy should be removed from the General Plan. While the County may have an interest in the DQ University property, the property is the site of a tribal college and should remain for tribal use and tribal purposes. The County's policy of seeking to obtain this property is perceived as counterproductive to a positive working relationship with the Tribe.

Conservation and Open Space Element Policy CO-1.22:

CO-1.22 provides, "Support development of a new California Indian Heritage Center in the City of West Sacramento located at the confluence of the Sacramento and American rivers." The policy does not reflect any consultation with the Tribe; although the Tribe is not opposed to the

new Heritage Center, it would be appropriate to confer with the Tribe regarding such proposals.

Conservation and Open Space Element Policy 2.29, Biological Resources:

With regard to the restriction of development near water bodies, we are in support of Action PF-A9 in the Public Facilities and Services Element, which prohibits the installation of septic systems or leach fields within a minimum of 100 feet of all natural waterways. This is important for both public health and environmental health. On the other hand, Policy CO-2.29 in the Conservation and Open Space Element lacks specificity and is potentially too far-reaching. It prohibits development within 100 feet of "waterways," but some are defined as "perennial" and some are not. This needs clarification, especially for intermittent and ephemeral drainages.

In addition, the California Department of Forestry and Fire Protection has a system that classifies watercourses as Class I, II, or III based on the presence of fish and other factors. It is common in other counties for stream setbacks to be based on this classification system, e.g. a 100-foot setback for Class I watercourses, a 50- to 75-foot setback for Class II watercourses, and a 25-foot setback for Class III watercourses. While it is important to protect water bodies from the potential impacts of development for all the reasons listed in Policy CO-2.29, including fire and flood protection, recreation, and storm water settling, the policy would benefit from further definition. For example, is a livestock watering pond considered a "perennial pond?" Types of water features should be prioritized for different levels of protection. An exemption from the prohibition of development should be available for circumstances in which potential impacts can be avoided and/or mitigated. Whatever setbacks are ultimately defined by the County could be used by other agencies, including the California Department of Fish and Game and the U.S. Army Corps of Engineers as a basis for their regulatory decisions. This could have unintended consequences, i.e. prohibition of tractor turn-arounds within the setback.

Conservation and Open Space Element section F. Cultural Resources, 1. Background Information:

This section is the largest section discussing the Tribe. The Tribe feels that this overview does not accurately reflect the Tribe's history and cultural background, and that it completely omits any reference to the Tribe's major landholdings that are preserved as open space under conservation easements, which is within the scope of this section. Instead, the section focuses on the Cache Creek Casino Resort in a manner that is beyond the stated scope of this section. The Tribe asks that you remove this historical review and work together with the Tribe to draft the section in a way that accurately describes our history.

Additionally, on page CO-35, the Draft General Plan Update states that "Yolo County has conducted consultation with Native American tribes" in drafting this Plan. While this is true, the paragraph ends by stating the following, "In coordination with the two regional tribes, no sacred sites have been identified within the County." This statement is false and the Tribe asks that this line be replaced with, "The County has been consulting with the two regional tribes regarding the preservation of tribal cultural sites as required by a new law commonly referred to as SB 18 (Government Code §65450)." The Tribe is committed to developing a cultural sensitivity map that it can share with the County, but such a map is a sensitive matter involving legal restrictions on confidentiality, as well as tribal cultural concerns. However, a cultural sensitivity map is not the only way to identify cultural sites and work with the County. In fact the Tribe has identified many cultural sites in the County that are impacted by development projects and taken action to protect those sites to the greatest extent possible.

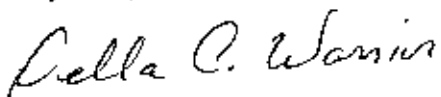
Conclusion

With these changes, the Tribe feels that the General Plan would provide for appropriate recognition of the community of Brooks as distinct from the Casino Resort, allow for utilization of the small growth boundaries of rural communities, accurately represent the cooperative and equitable relationship the County and Tribe envision by eliminating one-sided language, remove comments that do not reflect the positive working relationship between the Tribe and County, and incorporate a cooperative effort at recognizing the cultural and historical role played by the Tribe.

Lastly, the Tribe would like to take this opportunity to formally request to receive notice and an opportunity to comment for: all Area General Plans, Area Community Plans, and Specific Plans the County is currently updating or preparing to update, as referenced in Policy CC-3.1; any grading ordinance developed by the County under Action AG-A21; and when the County becomes involved with or considers adopting any of the programs and plans listed in the Conservation and Open Space Element, section B.2.

Thank you for this opportunity to comment on the County's work. The Tribe looks forward to continuing to be a part of the County's process.

Very Truly Yours,



Deella C. Warrior
Chief Operating Officer

57.

David Morrison

From: Jack Rye [jrye@cahf.org]
Sent: Tuesday, October 14, 2008 4:40 PM
To: David Morrison
Subject: Support for Blue Ridge Trail

To: David Morrison, Assistant Director
Yolo County Development Services, Planning and Public Works Department

Dear Mr. Morrison:

As a former Yolo County resident and long-time user of the Blue Ridge Trail, I want to add my voice to those who support including completion of the trail as an element of the Yolo County General Plan.

The trail is a beautiful part of Yolo County and deserves to be recognized and supported as an important component in the county's long-range plans.

Sincerely,

Jack C. Rye
jrye@cahf.org

November 19, 2008

David Morrison
Assistant Director -- Development Services
County of Yolo
292 West Beamer Street
Woodland, CA 95695

Dear Mr. Morrison:

This letter is in response to the Public Review Draft of the 2030 Countywide General Plan. Thank you for providing us the opportunity to comment on the Draft Countywide General Plan. We appreciate county staff keeping SACOG involved in the planning process during this update and for considering previous comments made in regard to growth within the county.

Several principles of SACOG's own Blueprint process were aimed at preserving agricultural resources while accommodating regional growth. We feel the Draft Countywide General Plan, by creating a plan where growth is focused on the cities of Woodland, Davis, Winters, and West Sacramento—and to a lesser extent the existing rural towns—reinforces these values. We understand that the somewhat higher growth levels that the county decided to use in the Draft Countywide General Plan as compared to Blueprint have been included to help build complete communities and aid in the county's fiscal needs.

One area in particular, the proposed Dunnigan Specific Plan area, was not included in the Blueprint as a future growth area, but instead as an additional concept to be studied at a later date. While we have raised concerns about this component of the Draft Plan earlier in the process, we very much appreciate the strong language included in this draft that links future housing growth directly to jobs growth. The ideas of creating jobs concurrent with housing, preserving a balance of jobs and housing, constraining residential growth to stay balanced with job creation, and requiring each housing phase to have accompanied job-generating growth could be a model for other general plans in the state as well as boundary changes for annexations and spheres of influence. If the final general plan includes growth in Dunnigan, we urge you not to weaken this language. It is essential that if at some point in the future Dunnigan moves to the Specific Plan process, that this commitment to jobs-housing linkage be retained. We know that the county is committed to avoiding the impacts on congestion and air pollution, including greenhouse gas emissions, that would come from the long-distance commuters that would be created through a classic bedroom suburban growth pattern in Dunnigan.

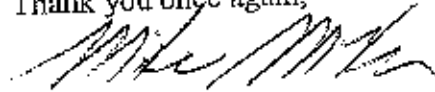
Auburn
Citrus Heights
Colfax
Davis
El Dorado County
Elk Grove
Folsom
Galt
Grass Valley
Lincoln
Live Oak
Loomis
Marysville
Nevada County
Placerville
Rancho Cordova
Rocklin
Roseville
Sacramento
Sacramento County
Sutter County
West Sacramento
Wheatland
Winters
Woodland
Yolo County
Yuba City
Yuba County

Mr. David Morrison
November 19, 2008
Page 2

We also applaud the document's many innovative recommendations for retaining and growing the farm economy in Yolo County. Among these innovations is a distinction between LOS standards for rural and urban roads, whereby rural LOS standards are higher in order to protect farm-to-market routes. These ideas will directly benefit SACOG's Rural-Urban Connections Strategy.

Taken as a whole this document clearly retains Yolo County's multi-decade commitment to agricultural viability and sustainable development. SACOG looks forward to continuing work with the County on the update of the General Plan and offers any assistance it can provide.

Thank you once again,



Mike McKeever
Executive Director

MM:KL:gg

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SIERRA
CLUB
FOUNDED 1892

Yolano Group
NORTHERIDGE CHAPTER

59.

November 20, 2008

David Morrison
Assistant Director, Development Services
Yolo County Planning and Public Works
292 West Beamer Street
Woodland, CA 95695-2598
David.morrison@yolocounty.org

Dear Mr. Morrison:

The Sierra Club Yolano Group has reviewed elements of the County of Yolo Draft 2030 Countywide General Plan and is submitting the following comments. Thank you for this opportunity to participate in the General Plan update process.

The Yolano Group often works with Tuleyome on various conservation issues, and we have read the comments submitted by that organization and strongly concur with their comments and reasons for their positions. We would like to be on record as endorsing those comments. We will now submit additional comments of our own, including reference to some of those submitted by Tuleyome.

General Comments.

We have concerns related to the apparent overall intent to intensify residential and commercial growth throughout the county. Of particular concern is the idea of a new town at Dunnigan. This would be a classic example of poorly planned growth. It would put a large number of housing units far from jobs and create a commuter community. In a time when global warming issues are going to have to figure strongly in future growth plans and patterns, this type of growth must be discouraged. The same is true for the proposed growth in Madison. Smart growth principles, especially in light of climate change issues, recommend denser residential growth in and around already relatively intensely developed communities and closer to jobs to reduce reliance on the automobile.

The draft General Plan has several references to increasing commercial development throughout the county especially along major roadways. This again could put development in the middle of open space and farm land, unconnected to communities. Future commercial and industrial development unrelated to agriculture should be connected to existing communities and infrastructure and in areas designated for that use. Of particular concern is the reference to high tech development along the I 80 corridor. This arose last year in relation to a proposal by a local developer to put a large biotech

facility and a large housing development adjacent to the by-pass. This type of proposal not only puts a large urban development in the middle of farm land, and very valuable farm land, but also would have serious impacts on the by-pass and its abundant wild life. This type of development must be discouraged.

Agriculture.

We have concerns with the proposed Agricultural Districts program, and we addressed this issue previously in a letter to the supervisors. One major concern with the concept of an Ag District is that it could permit residential development in the middle of ag land, unconnected to existing development. It is still unclear exactly what an ag district is, as there has been no clear definition offered. Apparently, however, agriculture is not necessarily a priority. According to a letter-to-the-editor by the attorney representing Taylor Properties last year, an Ag District can permit development of urban communities in the middle of farm land. The transfer of development rights from existing parcels to another property or properties elsewhere in the District appears to be a key component of an Ag District designation. As such, an Ag District designation could be the first step to allowing dense urbanization in rural areas. Unless an Ag District designation can be defined as being specific for preservation of farmland and prohibiting rural housing developments, Ag Districts should not be a part of the General Plan. As currently "defined", an Ag District designation could permit urban development in the middle of farm land or open space. The transfer of development rights from one or many parcels to another or others and the encouragement of "clustering" houses, can lead to the same result. This type of development is classic bad planning. It is leap-frog development, it puts commuter communities in the middle of open space and farm land fed by narrow country roads, and it violates the Blue Print Process smart growth guidelines which discourage sprawl onto farmland and encourage dense development in existing communities.

In addition to the potential negative impacts on farmland, Ag District Designations and potential for urbanization could also impact vital habitat areas in the county. One such area is Clarksburg. Clarksburg is in the primary zone of the delta. Yet, under the Ag District Designation, the county is considering actions, such as relaxing regulatory standards, lowering building fees, and allowing additional housing to encourage business development and expansion. The impacts of these actions on the fragile habitat must be considered prior to any actions are taken. The concept of Ag Districts needs to be more fully discussed before implementation of such designations.

On page AG-3, reference is made to urbanization pressures from the Sacramento Region and the bay area on Yolo County and the need to meet these pressures with increased urbanization here. Yolo County has a long-standing emphasis on farming and keeping farming viable here and with good reason. We have some of the best farm land in the world. Instead of giving in to development pressures here, we should instead encourage future urban development around already existing communities, whether here in Yolo County or in the Sacramento or Bay area, and continue to preserve our irreplaceable farm land for production of crops to benefit the entire region. Yolo County could become the

food basket for these other communities and establish regional marketing facilities for Yolo County goods.

The total gross revenues from farm products in 2007 were \$454 million. Other farm-related services boost this to over \$1 billion. Agriculture provides a very significant portion of the tax base in Yolo County. Actions that would negatively affect farm land or the ability to farm in Yolo County would cause serious economic harm. Consideration of diversification and construction of more housing and commercial ventures must take into consideration cost of providing necessary services and infrastructure and how that affects any financial gain. These types of developments, especially unconnected to existing communities, generally cost more to service than they bring in financial gain.

Following are specific comments on specific goals, policies or actions.

AG-20, Policy AG-1.7. We have concerns with this policy related to the term "clustered" in relation to housing, if this would encourage transfer of development rights and development of urban communities in rural area. We strongly support AG-1.11, AG-1.12, AG-1.13 and AG-1.14.

AG-22, Policy AG-2.10. We strongly oppose this policy. The existing language would place constraints on important conservation efforts.

AG-22, Policy Ag-2.12. We feel strongly that flood control within the by-pass should be the primary use and the need for shallow water fish nurseries may be a major secondary use.

AG-23, Policy Ag-2.13. This should be stated to "require" growers to use ag methods that reduce the use of harmful chemicals.

AG-23, Policy AG-3.1. We do not agree that Ag Districts are necessarily good policy for reasons outlined previously. This issue deserves more discussion until the actual definition of an Ag District can be developed and what are the impacts of this designation.

AG-26, Policies AG-3.18 and 3.19. In determining where related commercial and industrial uses can be located on land designated agriculture, factors such as soil type, productivity, impacts on surrounding farmland, and ability to continue to farm, especially in terms of organic farms where certain types of industrial uses could impact organic status (as is the case with the cement factory, a non-ag related use permitted in the middle of farm land). Other concerns should be presence of necessary services and infrastructure to service the development.

AG-32, Action AG-22. See previous discussion of Ag Districts with special attention to the final action to streamline the permitting process for housing for ag families. Care must be taken to ensure any housing is indeed only for farm families and farm workers.

AG-33, Action AG-A27. See previous comments related to transfer of development rights and farm worker housing.

AG-36, Policy ED-1.10. Refer to previous comments related to development next to the by-pass. Development of this type should be contiguous with already developed land in the county or on University property.

AG-36, Policy ED-1.13. Development plans in the Clarksburg area must consider the important nature of the primary zone of the delta and need to comply with the Delta Land Use and Resource Management Plan.

Conservation and Open Space.

CO-12, Goal CO-1. We strongly support provision and maintenance of a diverse and connected network of open space.

CO-14, Policy CO 1.22. We do not want to encourage OHV use and are concerned that creation of a dedicated park could encourage further illegal use of OHV. We would strongly encourage enforcement against illegal use of OHVs.

CO-18. We strongly support Tuleyome's comments on Biological Resources.

CO-22, Policies CO-2.1 through 2.16. We strongly support these policies to encourage protection and restoration of native habitats.

CO-23, Policy CO-2.17. Development should be contiguous with existing development. Clustered housing should not be permitted in the middle of open space and ag land.

CO-23, Policies CO-2.20 and 2.21. We strongly support preservation of oak woodlands and the concept of no net loss of oak woodlands, alkali sinks, rare soils and geological substrates that support rare endemic species. We strongly encourage no net loss of blue oak woodlands and grasslands at all.

CO-24, Policy CO-2.29. A 100 foot setback is not sufficient. We would prefer to see a larger setback.

CO-26, Action CO-A23 and A224. Strongly support these actions.

CO-54, Policies CO-5.14 through CO-5.16. We strongly support policies that require development proponents to demonstrate that there is an adequate long-term and sustainable water supplies under all conditions and that the development will not significantly impact groundwater recharge. We strongly support reuse of reclaimed water where feasible, and feel this should be a requirement of new development.

CO-56, Action CO-A69. We do not support exports of Yolo County groundwater to locations outside Yolo County.

CO-62, Goal CO-6 and its policies. We strongly support efforts to improve air quality through good planning policies and other efforts. This includes building new developments contiguous to existing development and encouraging placing new housing near jobs to reduce commuting.

CO-64, Goal CO-7 and its policies. We strongly support efforts to promote energy efficiency and conservation.

CO-67. We strongly support efforts to reduce GHG emissions. We support a movement higher density development that uses a mix of uses to reduce the need for the automobile and an attempt to place jobs near housing and vice versa.

CO-73, Policy CO-9.15. We do not support this policy unless we are mis-interpreting it. Clarksburg is in the primary zone of the delta.

Land Use and Community Character.

LU-15, Policy LU-2.3. We strongly support this policy.

LU-15, Policy LU-2.4. We strongly support this policy.

LU-15, Policy LU-2.5. We strongly support this policy.

LU-16, Policy LU-3.1. We strongly support this policy.

LU-21, Policy LU-6.11a and b. We question this. This is consideration to place special needs housing, most likely senior, in the north west quadrant, far from the city core and most amenities. This is not a good location for this type of housing. Special needs and senior housing should not be segregated far from the rest of the community. This type of housing should be incorporated throughout the community in all developments.

LU-22, Policy LU-6.11e. No development should take place next to the by-pass.

LU-26, Goal CC-2 and its policies. We support this goal and these policies as defining good planning principles.

LU-30, Policy CC-3.5b. We do not support building in the hills. These areas are often areas of important habitat.

LU-40, Policy CC03.16. Development should be contiguous to existing development and where services and infrastructure already exist.

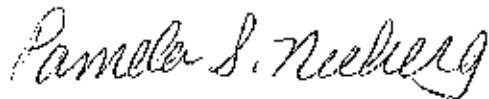
LU-40, Goal CC-4 and its policies. We support growth that incorporates good planning principles and green design. These should be required of all new growth to the extent feasible.

LU-49, Action CC-A26. We support this policy and believe it should be extended to prohibit new housing in the hills to the extent feasible.

LU-49, Action CC-A28. We support this action to avoid constraints on agriculture by establishing criteria for approval.

Again, we thank you for the opportunity to comment on the County of Yolo Draft 2030 Countywide General Plan. We will continue to be involved in this process through the EIR and final GP review.

Sincerely,



Pamela S. Nieberg
Chair, Sierra Club Yolano Group

David Morrison

From: Mark D. Spiller [markspiller@gmail.com]
Sent: Tuesday, October 14, 2008 12:08 PM
To: David Morrison
Subject: support for the Blue Ridge Trail

60.

Dear David,

I recently received word of the potential easement for hiking access to Berryessa Peak. I am *VERY* excited about this news, and just wanted to put in a word of support for keeping the completion of the Blue Ridge Trail in the General Plan - I would really like to see this trail become reality!

I heartily support the creation of more hiking trails in Yolo county, and hope that you can help us with this!

Thanks so much for your help!

Mark Spiller
2109 Bearden St
Davis, CA 95618

David Morrison

From: Tom Stallard [tstallard@legintent.com]
Sent: Monday, October 13, 2008 5:00 PM
To: David Morrison
Subject: Blue Ridge Trail

61.

Hi David. Just wanted to weigh in and urge the retention of the Blue Ridge Trail extension in the County General Plan. I have climbed the existing trail probably a dozen times. It is wonderful. Because you must carry your own water, the extension will attract few hikers and only the most serious hikers. The rest must turn back before their water runs out. The views when one is walking along the ridge are spectacular. I hope the commission will not deny the public access to this spectacular recreation option. Please leave it in the plan. Tom Stallard

David Morrison

From: Laura Bibelheimer on behalf of Helen Thomson
Sent: Monday, September 15, 2008 3:08 PM
To: David Morrison; Heidi Tschudin (htschudin@sbcglobal.net)
Subject: FW: General Plan changes

62.

From: Meredith Stephens [mailto:mks@afes.com]
Sent: Saturday, September 13, 2008 1:24 PM
To: Helen Thomson
Subject: General Plan changes

Dear Helen,

I hope to attend the meeting Tuesday, but in case I cannot, I wish to make these comments for the record,

John and I share the visions as set forth in the Agricultural Preservation Element.

As you know, John's family has been involved in farming in Yolo County since the 1850's and we still occupy the same location. As stated in the Agricultural Element in the latest Yolo County General Plan, division of farmland for non-agricultural purposes is precluded. That is why we vigorously oppose the application by developer John Detterding for rezoning of his land for higher density residential purposes. When we sold that parcel of land to him it was designated for light industrial purposes and we specifically told him we did not want any encroaching residential uses. We also advised him it was in a FEMA floodplain and that residential uses would pose a danger to humans who would occupy those residential uses. He then made application to the Esparto Advisory Committee for a change in zoning to residential and it was denied. Since all that transpired, he continues his efforts for rezoning to residential. We have constructed a pond on the property in conjunction with the Audubon Society and have substantially increased the amount of wildlife and open space in accordance with County goals and policies on the property adjacent to the Detterding holdings. Furthermore, his property and our adjacent lands contain significant Indian sites. It is obvious with the flooding problems, and the fact that the rezoning is contrary to County Land Use plans and policies, this rezoning request should be denied.

Esparto seeks only to retain his small town agricultural character, and not be just another link in the never ending chain of urban encroachment. We don't have a town council to represent us, so can only look to the Board of Supervisors to continue your dedication to preserving farmland.

Please enter this communication into the public record.

Thank you,

Meredith Stephens

David Morrison

From: MICHAEL STEWART [stewfam530@sbcglobal.net]
Sent: Sunday, October 12, 2008 8:01 PM
To: David Morrison

63.

Dear David,

I'm writing to express to you my support for the Blue Ridge hiking trail that connects Cache Creek to Putah Creek. I think a trail that allows more yoloans to access the outdoors will support the communities in our region. We all need more outdoor ties to keep peace in the cities.

Thanks, Mike Stewart

The Vineyards at Cache Creek Ranch

November 5, 2008

Yolo County Planning Commission

RE: General Plan Hearing
November 5, 2008

Dear Chairman and Members of the Yolo County Planning Commission:

I appreciate the opportunity to provide my comments to the draft General Plan for Yolo County as follows:

Policy LU-2.3 (Page LU-15) This policy is very restrictive and limits the tools available to Ag Districts. We suggest that the policy be left broader to allow Ag Districts more flexibility. We suggest the following change:

Manage agricultural parcels of less than 20 acres, including antiquated subdivisions where appropriate, to create compatibility with surrounding agricultural uses to the greatest extent possible, including: 1) discourage residential development where not consistent with Ag District policies; 2)

Policy LU-2.5 (page LU-16) This policy treats all agricultural land the same and does not create or encourage new concepts which could be applied to support or expand agricultural production in Yolo County. A suggested change would be as follows:

Vigorously conserve, preserve and enhance the productivity of agricultural lands in areas outside of adopted community growth boundaries and outside of city SOIs

Policy LU-3.1 (page PU-16) This policy is also overly restrictive and does not provide for future opportunities.

Direct all of the County's residential growth to designated areas within the cities and within the growth boundaries of existing unincorporated communities, as depicted on the Land Use Diagram in Figure LU-1, with the exception of individual farm dwellings (houses allowed on agricultural land), other allowed units (e.g. second units, ancillary dwellings, houses allowed in mixed-use commercial areas, etc.) and housing allowed on existing residentially designated land and/or consistent with Ag Districts policies.

Table LU-4 (page LU-61)

Land Use Designation (XX)	Allowed uses	Residential Density	Persons Per Acre	FAR Maximum	Maximum Impervious Surface
Agricultural District (PD)	As determined by future policies for Ag Districts.				

Agri Cultural district overlay on page LU-61: we think that this is a great policy and are glad that it is included.

Policy AG-3.1 (page AG-23) Again, this limits the outcome of the Ag District.

Agri Cultural District shall be established in areas where agricultural business development and expansion will be encouraged through the use of targeted regulatory streamlining, financial incentives and specialized marketing efforts, as determined by policies in each individual Ag District. In the suggested policies Dunnigan Hills encourage expansion of agriculture.

Policy AG-3.1 (page AG-23) We believe that this policy restricts possible flexibility stemming from the Agricultural Study currently underway. We believe this paragraph should be modified to not predict the outcome of the Study as follows:

Agricultural Districts shall be established in areas where agricultural business development and expansion will be encouraged through policies developed within the Ag Study policies specific to each agricultural district.

Policy AG-A6 (page AG-28) This is an excellent item but it is not clear how this can be implemented without parcelization of appropriate properties. We suggest the following language be added at the beginning of the policy:

Consistent with Ag District policies that allow parcelization, develop specific criteria....

Policy AG-4.4 (page AG-38) Expand this policy to include horse trails/equestrian as follows:

Encourage eco-tourism including horseback riding, boating, kayaking, canoeing, fishing, hunting, hiking and bird watching.

Action ED-A29 (AG-44) Adding the following action item:

Complete the Agricultural Study currently underway with the Ag Issues Center at U.C. Davis. Develop policies based on the Study to be implemented within the Ag Districts identified in this study.

Page HO-49 there is a statement "Yolo County seeks to ensure adequate housing for all households,..." we believe that this statement should be expanded to provide for greater flexibility as follows: **Yolo County seeks to ensure adequate housing for all households in ways that are supportive and consistent with other policies in the General Plan.**

Policy HO-1.1 (page HO-85-86) A new policy could be added as follows:

New policy HO-1.9 provide housing opportunities consistent with conclusions of the Ag Study and specific to policies in each Ag District.

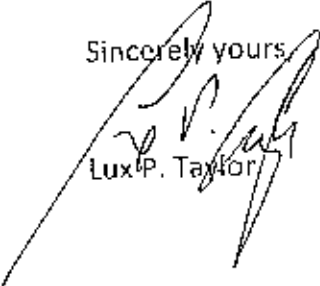
Appendix C of the Economic Development Strategy (page 24); Suggested changes under District Policies and Programs: Promote policies that encourage vineyard and olive grove planting and investment. Promote intensive permanent agricultural investment in areas served by surface water.

Activities (page 26)

20. Recruit small scale wineries to the region located at appropriate locations.
21. Assist the viability of existing vineyards and wineries in the district.
22. Ensure land use and development policies that encourage investment in agriculture and agri-tourism
23. Enhance cooperative, small scale processing, warehousing and marketing capacities.
24. Ensure the provision of adequate services to the emerging wine industry.
25. Create effective policies, incentives and support in the Dunnigan Hills Agricultural District.

Thank you for considering my comments and allowing me the opportunity to speak today.

Sincerely yours,



Lux P. Taylor



*Protecting the wild and agricultural heritage
of the Putah and Colusa Creek Watersheds
for existing and future generations.*

November 20, 2008

David Morrison
Assistant Director- Development Services
Yolo County Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95695-2598
David.morrison@yolocounty.org

Re: Draft General Plan Comments – CEQA Documentation

Dear Mr. Morrison:

Tuleyome has reviewed the County of Yolo Draft 2030 Countywide General Plan and makes the following comments. We have grouped them as to general and specific comments. Please review these comments to determine whether any comments raise issues that need to be addressed in the CEQA document for the General Plan Update; please address those topics in the CEQA document. We also note that we may have additional comments through the general plan review process.

General Comments:

1. Tuleyome feels that it is inadvisable to combine the Agriculture and Economic Development sections in the general plan. Certainly agriculture is a predominant economic generator in the county and we very much support the counties efforts to protect and promote agriculture. However, combining these elements deemphasizes other opportunities for economic growth such as eco-tourism and cooperation with new city related economic initiatives.

As an example, Tuleyome has proposed the establishment of the Berryessa Snow Mountain National Conservation Area on the regions public lands. Attached is the executive summary of our report entitled *The Berryessa Snow Mountain Region- The Undiscovered Landscape: A Status Review and Management Recommendations for a National Conservation Area*. The full report will be available on our web site at www.tuleyome.org.

This proposal has significant economic development opportunities for both agriculture through cause-related-branding and for gateway communities such as Winters, Esparto, and Guinda.

Attached are the executive summaries of reports entitled *Economic Potential for Gateway Communities* and *Economic Potential for Branding Near the NCA* which outline these opportunities. The full reports will also be on our web page.

These potential economic opportunities revolve around the protection and promotion of public lands. Another good example is the development of the Pacific Flyway Center at the Yolo Basin Wildlife Area near the intersection of I-80 and the Pacific Flyway. Birding tourism is a \$10 billion dollar industry and Yolo County should work hard to capture some of these dollars.

2. Climate Change and increasing energy costs will significantly change the way we live and do business. Despite the short term decline in cost relating to a world wide recession and decrease in demand, energy costs will increase significantly over the life of the General Plan. Yolo County is to be complimented for their recent work on this issue and for emphasizing the measures that are present in this Draft General Plan. However, a thorough analysis of climate change issues will require a reevaluation of the proposed land use element. In particular this relates to rural community development such as proposed at Dunnigan. The EIR for the general plan must evaluate the impact of increased housing at Dunnigan where most workers will have an extra 17 mile (one-way) trip added to their daily work commute with little opportunity for alternative transit against the location of those housing units in and around existing cities such as Davis, Woodland and West Sacramento where real transit opportunities exist. The same analysis must be done for proposed growth in Madison. The City of Stockton recently settled a lawsuit with Edmund G. Brown, Attorney General of California and others over the adequacy of CEQA review with respect to climate change and the need to reduce greenhouse gas that related directly to how and where development occurs. We are attaching that Memorandum of Agreement.
3. Increasing energy costs will have a large impact on agriculture as costs for tractor and airplane operation and fertilizer increase. The non-profit Roots of Change organization (www.rocfund.org) has begun to address this and other needs for a changing agricultural system with respect to increasing fuel costs, food system sustainability, environment, and healthy communities and people. They have developed a Declaration for Healthy Food and Agriculture which is attached to this letter. The reasons for this declaration are as follows:

The movement to create a healthier food and agriculture policy in the US has been slowly and steadily gaining ground for well over a decade. Those all around the nation who began the work are encouraged by the progress and simultaneously concerned by the pace of change given the disproportionate impact of food and agriculture on personal and planetary health.

The public's increasing interest and the media's deepening coverage of climate change, energy, agriculture, rural poverty, labor issues, food costs, food quality and obesity may finally illuminate the interrelationship of these crises and provide a context for urgently needed changes, which are clearly possible.

The Declaration is meant to provide:

1. A clear statement of what kind of policy is needed now, endorsed by a broad base of organizations and individuals with a long-established commitment to a healthier food and agriculture.
2. An invitation to all Americans to join in the improvement effort by taking action in their own lives and communities and by offering them a way to call on policymakers to support comprehensive change.
3. A set of principles from which policy makers can craft policy that will lead to a healthier system.

Tuleyome strongly encourages Yolo County to adopt the attached Declaration and to incorporate its principles into this General Plan.

4. Much has been learned about conservation biology since the last Yolo County General Plan. In particular, biologists recognize the general need for large, little-disturbed habitat areas with connecting migratory corridors. The General Plan needs to include this in its conservation element, based on a possibility that the Yolo Natural Heritage Program plan (HCP/NCCP) is not adopted. That is, what would be the policy framework in the conservation portion of the General Plan if the HCP/NCCP is not available to satisfy the County's need for a large-scale conservation plan? What elements would the General Plan include? As an example, the proposed Berryessa Snow Mountain National Conservation Area contains important core areas, including BLM-managed public lands at the Berryessa Peak, Blue Ridge and Cache Creek units. These lands represent an important south-north migratory corridor that intersects with the east-west migratory corridors along the riparian habitat of Putah and Cache Creeks. The general plan needs to recognize the importance of protecting these core areas and the necessity for safe passage along the intervening corridors.

Migratory corridors are not just a thin strip along these creeks but must be considered as a mosaic in association with agriculture practices. In many respects the farmers of Yolo County have recognized this through the establishment of tail ponds, hedge rows and other native plantings and the recognition that some crops such as alfalfa are of particular importance as foraging habitat for Swainson's hawk. We support the general plan policies that support and encourage this conservation work by Yolo County farmers.

Specific Comments:

Vision

VI-4. 2.5. This list should include camping.

Land Use

LU-15. Policy LU-2.3. We support the intent of this policy.

LU-15. Policy LU-2.4. We support the intent of this policy.

LU-19. Policy LU-3.8. This policy will help to avoid many significant mistakes.

LU-22. Policy LU-6.11c. We support this policy. If this area is to be developed based upon prior entitlements, the development should be denser in the range of 8 to 12 units per acre. Clusters and smaller homes should be encouraged.

LU-26. Goal CC-2, Community Planning, Goal CC-3 Planned Development, and Goal CC-4 Project Design. These are generally good sections defining "smart growth." Of particular importance is Policy cc-3.3 that requires that jobs are created concurrent with housing.

LU-30. Policy CC-3.5B. We are concerned about building in the hills as these "poorer" soils often contain important plants and animals. The policy should be changed to discourage building in the hills.

LU-49. Action CC-A26. We support this policy although it should be changed to read prohibit the location of new homes in the hills to the extent feasible.

LU-50. Add CC-A32. Investigate and implement designation of I-505 as a national scenic highway.

Agriculture

AG-7c. Agriculture Water Supply. New developments and housing can create problems for irrigation delivery systems. The county should consult closely with the YCFCWCD on all development and zoning applications to ensure they do not impinge on the existing delivery system.

AG-20. Policy AG-1.5. This policy must be modified so as not to discourage or limit restoration to habitat.

AG-20. Policy AG-1.7. This is an important policy to protect farmland in Yolo County and we support it.

AG-21. Policy AG-1.14. This is an important policy to protect farmland in Yolo County and we support it.

AG-21. AG-1.21. Affordable farming. We support efforts to develop and encourage incubator farms.

AG-22. Policy AG-2.8. We support this policy.

AG-22. Policy AG-2.9. We support this policy.

AG-22. Policy AG-2.10. We oppose this policy as written. While we are sympathetic to this issue, each habitat area must be treated on an individual basis. This policy should not become a constraint on appropriate restoration work.

AG-22. Policy AG-2.12. Flood management within the Yolo Bypass must be the primary use. Agriculture, recreation and habitat should be balance with the one proviso that the need for shallow water fish nurseries may be the major secondary use in the southern portion of the Bypass.

AG-23. Policy AG-2.13. While recognizing that the farming community generally does not waste their resources with excessive application of expensive pesticide, herbicide and fertilizers, this should be county policy.

AG-24. Policy AG-3.1. Dunnigan Hills. This district if it is to be established must recognize the need to protect sensitive species habitat.

AG-27. Action AG-A1. Agricultural Mitigation. We are opposed to this Action and the related policies that direct this action. A discussion of this issue was held at the County Ag Working Group meetings. While the current ordinance emphasizes

adjacency, there was a lot of discussion as to whether this was the best criteria for protecting agriculture. Is it better to mitigate in an area with prime soils that is further from growth boundaries, and in area where larger contiguous parcels can be protected or should the adjacency be the major criteria. This item needs more discussion and planning.

AG-31. Action AG-A21. We support this action.

AG-32. Action AG-A22. We support this action. As noted in our general comments there are economic opportunities associated with cause related branding associated with the proposed Berryessa Snow Mountain National Conservation Area.

Conservation and Open Space Element

Needed Addition. One area we would like to see addressed in the policies for open space is the abandonment of roads. Road rights-of-way are important to access public lands, as well as current and potential future connectors for trails and access to lands that may be acquired in the future. We would like to see a policy that does not allow for future road abandonments, but instead retains the public right-of-way while either ending maintenance of the road or closing it to motor vehicles other than those needed to serve parcels behind the closed area. If a road were to be abandoned, a right-of-way for future use as a public hiking trail should be retained. Both ideas are supported by the California Streets and Highways Code.

CO-6. Top of page. The Conservation Partnership is actually called the Blue Ridge Berryessa Natural Areas Conservation Partnership

Figure CO-1. This Figure is inaccurate in that it combines BLM managed public lands with private land conservation easement. They need to be separated in the legend and in color. This figure also shows the Blue Ridge trail, which we support, although the location north of the BLM Berryessa Peak unit is inaccurate. The trail actually leaves the crest and moves to the Napa County side of the range before returning to the crest at the BLM Blue Ridge unit. With sensitivity for landowner concerns it is possible to draw the trail south of the Berryessa unit to the BLM trail easement as a dotted line.

CO-8. The proper name is the Berryessa Snow Mountain National Conservation Area. This proposal involves **only public lands**. The region extends 100 miles from south of Putah Creek to Snow Mountain in the Mendocino National forest and ranges in elevation from under 3000 feet in the Blue Ridge to over 7000 feet at Snow Mountain. It consists of about 470,000 acres. Serpentine soils with rare and endemic plants, chaparral, blue oak woodland, riparian habitat, and sub-alpine habitat make this region an important part of the California Floristic Province which is one of the biological hotspots on the planet. Its south-north orientation and the increase in elevation northward makes this region ideally suited for climate change mitigation where plants and animals must migrate north and/or upslope. Additional information on this proposal including a map of public lands can be found at www.tuleyome.org.

Because policy CO-8 would address climate change a “climate icon” should be added to this policy.

CO-11. The Cache Creek State Wild and Scenic River should be mentioned in this section and noted on Figure CO-3.

Goal CO-1. Policies CO1.1 through CO1.17: Tuleyome is very supportive of efforts to preserve the open spaces of Yolo County, and to provide compatible recreation opportunities. In particular, Policies which support integrated networks of open space, as well as trail networks, are particularly favorable.

Tuleyome was an active participant in development of the County Parks Plan, Open Space and Recreation Element of the General Plan, as well as the Oak Woodlands Management Plan. We have previously supported and encouraged development of trail networks and preservation of resource areas. For those reasons, we strongly support policies CO-1.1 through CO-1.17.

CO-13. Policy CO-1-18. Out-of-county mitigation easement. We generally support out-of-county mitigation. However, this is a complex issue that has not yet had extensive discussion in the county. It is also directly related to the recent discussion at the Board of Supervisors concerning habitat use permits that directed that a discussion and meeting of stakeholders occur. It may be premature to include this at this time.

CO-14. Policy CO-1.19. The correctly listed entities that are working on this trail include the Napa County Regional Parks and Open Space District, Berryessa Trails and Conservation, Bureau of Land Management, California Department of Fish and Game, and Tuleyome.

Tuleyome has long worked, both collectively and through our individual members, in support of the Blue Ridge Trail. Successes to date include maintenance of the existing trail segment with BLM; Tuleyome’s acquisition of the 640-acre Ireland Ranch, which connects with the BLM’s Berryessa Peak Unit to allow extension of the trail; and the voluntary donation of a trail easement through private land on the Napa side of the Ridge, which will allow connection of the existing Blue Ridge Trail from Cache Creek to the Ireland Ranch, 30-miles down the ridge. At Monticello Dam, the BLM acquired, in the late 1980s, from willing sellers, about 2 miles of trail coming up to the ridge from the dam.

This concept is nearing completion, and it is important that Yolo County recognize and support this ‘big vision’ of providing a ridge trail for Yolo County residents and tourists. Supporting the trail puts Yolo County in the position of being able to plan wisely for connections to the trail, alignment issues, as well as necessary signage. Opponents of the trail incorrectly state the trail will go through the private property of unwilling owners. This is not the case. The vast majority of the 38-mile trail

(approximately 35 miles) is on existing public land. The remaining right-of-way will only be acquired through willing participants who may grant an easement or sell land to a public entity for completion of the trail.

CO-14. Policy CO-1.20. Tuleyome strongly supports creation of a new State Park in Yolo County.

CO-14. Policy CO-1.22. Tuleyome encourages the County to increase enforcement against illegal OHV use in other areas of Yolo County and that appropriate environmental mitigation and review are applied to any chosen site. Without increased enforcement against illegal OHV use, an increase of OHV use in the County through creation of a dedicated park could increase illegal riding as well.

CO-15. Action CO-A4. Again, the proposal name is the Berryessa Snow Mountain National Conservation Area.

CO-16. Action CO-A12. We strongly support this Action item. But, we might recommend that a bond measure also address farmers' water needs and habitat.

CO-18. Biological Resources. This background section is generally inadequate in its description of conservation biology. While various habitat types are described the necessary biological processes to ensure the ecological integrity of these habitats and the populations of plants and animals associated with them is lacking. There is no mention of core areas or connectivity corridors and the need to maintain them. An action item to adopt and implement the Yolo Natural Heritage Program is inadequate for this general plan. The YNHP has not been adopted and may never be, and a general plan that relies on the presence of a future plan that is not adopted or an action that never takes place is legally inadequate; until the YNHP is in statute the General Plan must include a self-standing conservation element that meets all General Plan law and CEQA guidelines.

CO- 22. Policies CO-2.1 through CO-2.16: Tuleyome supports policies that encourage protection or restoration of native habitats. These policies will further those goals.

CO- 23. Policies CO-2.17 through CO-2.18: Clustering of developments would be preferable over lack of clustering. However, directing development to existing communities, in addition to clustering, would be preferable.

CO-24. Policy CO-2.29: Tuleyome supports setbacks that protect sensitive habitat and provide for compatible recreation. However, we believe the minimum should be increased. A 100-foot "buffer" allows uses to still be quite close to creek banks and could still impact habitat and animals within the sensitive zones. A larger minimum setback would be preferable and may be necessary in some cases.

CO-27. Action CO-A28. Additional wording or another action item should be added to specifically include a countywide program to reintroduce fall-run anadromous salmonids to Cache Creek. This would include passage or elimination of fish barriers and improvements in habitat. Similarly, another action item or additional wording should be added to include enhancement of shallow-water fish habitat in the Yolo Bypass. The Cache Slough area has perhaps the highest potential to increase fish breeding and survival in the delta region.

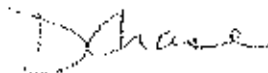
CO-40. Policy CO-4.13: Native American archaeological and cultural resources are difficult to be mitigated once disturbed. Emphasis should be on avoidance.

CO-54. Policy 5.11. There has been no recent economic analysis or environmental review on completion of Tehama-Colusa Canal. The General Plan should not facilitate or encourage the completion of the canal as a specific project until this review is completed.

Conclusion:

Thank you for the opportunity to comment on the County of Yolo Draft 2030 Countywide General Plan. We look forward to working with you on the EIR review and final General Plan review.

Sincerely,



Debra Chase
Executive Director

Attachments:

Berryessa Snow Mountain National Conservation Area Executive Summary
Gateway Economic Report Executive Summary
Agriculture Cause Related Branding Economic Report Executive Summary
Declaration for Healthy Food
Stockton Memorandum of Agreement

Attachment 1: Berryessa Snow Mountain National Conservation Area

Executive Summary

“What really needs protection is the lowlands, which is where extraordinary numbers of species exist, and which do face pressure. The proposed Berryessa Snow Mountain National Conservation Area is exactly the kind of place that needs protection.”

Dr. Glen Holstein,

California Native Plant Society, Sacramento

The public lands of the Berryessa Snow Mountain region stretch from the lowlands of Putah Creek below Lake Berryessa across remote stretches of Cache Creek and up to the peaks of Goat Mountain and Snow Mountain. This vast expanse—nearly 500,000 acres in the wild heart of California’s inner Coast Ranges—provides habitat and critical long-term movement corridors for many species of wildlife; the area also registers a level of plant biodiversity so high as to make it an unusually rich part of the California Floristic Province, which is a biological hotspot on the planet.

Situated north of San Francisco and west of Sacramento, the region includes substantial portions of Lake and Napa counties, as well as portions of Yolo, Colusa, Glenn, and Solano counties. It is managed by a mix of federal, state, and local governmental agencies and encompasses wilderness, recreation lands, wildlife areas, and undeveloped watersheds.

The region’s diversity begins with its geology, a mixture of ancient sea floor and young volcanic rocks that exhibit plate tectonics at work. Putah Creek, Cache Creek, Eel River, and Stony Creek—the principal water sources—provide life to this diverse place. Along with their tributaries, these waterways are the threads of riparian habitat that harbor river otters, native fish, and sensitive amphibians such as the yellow-legged frog. Oak woodlands provide food and shelter to mule deer, black bear, mountain lion, and a vast number of birds. Chaparral clothes the region’s more arid slopes and harbors native pollinators. Remnants of California’s once extensive grasslands, which are being restored here, feed herds of tule elk. Old-growth forests support spotted owl, marten, and fisher. Rare and endemic plants on serpentine soils provide a laboratory of evolution. Over the landscape fly bald and golden eagles, peregrine falcons, and goshawks.

This region is situated close to the University of California, Davis (UC Davis), and has therefore been heavily studied. This research has contributed tremendously to our understanding of nature. The ecological interactions among soil, vegetation, wildlife, and water support the region’s fertile working landscape, which includes ranchlands, vineyards, orchards, managed forests, and (until recently) mines. The water that nourishes the natural environment also supports nearby urban populations and agricultural operations in other areas.

The Berryessa Snow Mountain region is threatened by encroaching development. The Sacramento and San Francisco metropolitan areas are expected to gain millions of new residents within the next ten years, which will fuel the existing development engine to

even higher speeds. As population spreads into the Berryessa Snow Mountain area, roads and development threaten to fragment this grand, unbroken expanse and limit wildlife movement.

With greater population comes increased need for recreation. Already the time and resources of local land managers are stretched thin as they attempt to manage current recreational demands on the region. Expanding need for water puts still more pressure on riparian areas that are already much altered.

At the same time invasive species that accompany human migration are increasingly displacing the rare plants unique to this area and reducing or degrading wildlife habitats. Further compounding the effects of human encroachment are the effects of climate change, to which plants and animals must adjust. For many of them the Berryessa Snow Mountain region is in future likely to be the only available source of refuge and migration routes.

All of the threats create tremendous management challenges. Yet the land is managed by many different entities, ranging from large federal agencies to relatively small nongovernmental organizations. This leads to widely differing goals, practices, and resources. Adequate protection of this unique landscape requires landscape-level management, and this can only happen with cooperation among the land managers.

A National Conservation Area (NCA) designation by the U.S. Congress for the public lands of the Berryessa Snow Mountain region (BSM) will represent acknowledgement of the region's value to the nation. The NCA designation will provide a framework for better coordination in the management of the public lands within the BSM, making it easier for farmers and ranchers to work with adjacent public landowners. National recognition as an NCA will also assist in the development of public and private conservation funding for the protection of the regional landscape, whether publicly or privately owned. Studies have shown that communities near the proposed NCA stand to benefit because the NCA designation provides greater visibility for an area. As a result communities can become more desirable as tourist destinations, attract a more diverse workforce, broaden their economic base, and gain new opportunities for marketing local products, especially agricultural ones, and funding conservation projects.

Private lands are not included in the NCA boundary and are not affected in any way by a nearby NCA designation. Water rights are also not affected. Local and state governments and agencies will retain their decision-making authority.

Lacking any formal recognition or framework, the Berryessa Snow Mountain region has not had the visibility that would allow it to compete with areas like the Santa Rosa and San Jacinto Mountains National Monument, the Santa Monica Mountains, or Lake Tahoe for state and federal resources. The consequences of a National Conservation Area designation include the following:

- A formal name will be given to the specific geographic area in question.
- Congress will acknowledge the local and national importance of the region.
- A Public Advisory Committee will be formed to provide official citizen input.

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□ A coordinated multiagency management plan for the public lands within the region will be developed, allowing for protection of ecological resources on a landscape level and a region-wide management of public recreation use.

Such formal recognition will make it easier to obtain state and federal funds for conservation and environmental stewardship, support ongoing restoration and enhancement projects, and develop a recreation program for the entire region that provides access on public lands while ensuring protection of the area's environmental resources.

Attachment 2: Berryessa Snow Mountain Economic Benefits Report

Executive Summary

The proposed Berryessa Snow Mountain National Conservation Area (BSM NCA) stretches 90 miles along the Inner Coast Range in northern California encompassing 500,000 acres of publicly managed land.

This report looked at the potential economic opportunities that a proposed NCA could offer two adjacent gateway communities—Winters in Yolo County and Clearlake in Lake County. A review of the literature indicates that the most successful gateway communities will have both a current favorable economic foundation on which to build and a strong political will and community support for becoming a gateway community.

The Sonoran Institute has documented the diverse range of economic benefits from an NCA. The report examines some of the economic benefits that previous designations have brought to their gateway communities and evaluates possibilities to the communities near the proposed BSM NCA. Some of the most commonly cited economic benefits associated with tourism and increased in-migration are: economic diversification, property enhancement, lower public services costs (i.e. taxes), and recreation.

Using publically available data from the U.S. Department of Commerce, in addition to personal interviews with key stakeholders, economic trends in both communities were examined. The report looks at the economic indicators of population, educational attainment, income and employment in each community. It also examined changes in tourism shown by changes in Transient Occupancy Tax (TOT) and other tourism-related industries. Finally the report looks to the regional asset indicators of workforce and innovation, lifestyle, and financial capacity to help quantify regional development and growth providing a more complete picture of the economic potential of the regions.

Both counties were found to have the ability to benefit economically from the designation of the proposed BSM NCA through increased off-season tourism, and in-migration of wealthy retirees. While both cities would gain benefits, they probably would not benefit equally.

Winters was found to be poised for prosperity; it has the economic foundation that the NCA can immediately build upon. It has a highly skilled workforce, high levels of education, population growth (but not exponential population growth), high levels of natural and human amenities, and growing levels of tourism-related industries. Although Clearlake a weaker economic foundation, as is apparent in the trends and indicators, it has improved since 1969. The city still has a lot of room for improvement and is not as well set up economically to immediately take advantage of the NCA. However, there is strong political will and the community support to make it happen. Clearlake has more to gain economically, and therefore, is more welcoming to embracing the NCA and potential economic benefits.

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The designation of the proposed NCA would be the first step towards economic prosperity and development in these regions.

Attachment 3: Berryessa Snow Mountain Agriculture Cause Related Branding Economic Benefit Report

Executive Summary

Opportunities for successful marketing of agricultural products will increase for local farmers and ranchers if the Berryessa Snow Mountain region becomes a National Conservation Area (NCA). This paper focuses on agricultural branding opportunities in Yolo and Lake Counties, since the gateway communities of Winters and Clearlake reside within their borders. In order to find out whether the creation of a NCA could create value for regional agriculture, individuals were surveyed at farmers markets in San Francisco, as well as the counties of Yolo and Lake. The average survey participant indicated they would pay a 17% premium for a NCA rib eye steak (see appendix). The data collected in this survey comes as no surprise when viewed in light of the research described below and throughout the paper.

Cause related marketing spending by corporations has been growing in the US an average of 12.5% per year for the past four years (“Cone Millennial,” 2008). The NCA would both draw attention to the geographical region and make a powerful sustainability statement, namely the protection of 500,000 acres of public lands. Agricultural products, if associated with the NCA, would benefit from the increasingly popularity of “local” and “sustainable” labeling in the food industry.

In *Regional Agricultural Marketing: A Review of Programs in California*, published by the University of California in 2006, members of agricultural marketing programs in Northern California are interviewed. Based on these interviews, the study concludes that “point of origin” and “certified sustainability” are the most effective branding concepts for regional agricultural marketing programs (Feenstra, 2006).

There is an increasing focus in Yolo and Lake counties on local food products. The Yolo county Agricultural department’s \$300,000 funding of the project “A Taste of Yolo”, which promotes local foods, has resulted in many citizens feeling that buying regional foods is essential (Evans, interview, July 23, 2008). In Lake County, vineyard acreage has increased an average of 8% for the past 7 years and the chamber of commerce has created wine tour maps to showcase the vineyards.

The organic sector showed the second highest gross value of production of Yolo County’s 8 major commodities in 2007. The organic sector’s success is most likely due to direct marketing as neither unit price increase nor acreage increase accounts for the impressive gross value of production in this sector. It is estimated that 75% of Yolo County direct marketing sales comes from the organic sector (Hardesty, 2005). Direct marketing’s regional success bodes well for NCA branding since it would be most wisely used in conjunction with direct marketing.

In this report three case studies are presented to show how the NCA could potentially benefit agriculturalists: Country Natural Beef, based in Oregon, Yampa Valley Beef, with headquarters in Colorado, and Five Dot Ranch, based closer to the potential NCA region in Standish California.

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These companies demonstrate how sustainability, locale, and land conservation can increase market share and profitability. A Berryessa Snow Mountain National Conservation Area could be used as a marketing tool by agriculturalists in the region to bolster local and sustainability labeling claims.

Attachment 4: Declaration for Healthy Food

We, the undersigned, believe that a healthy food system is necessary to meet the urgent challenges of our time. Behind us stands a half-century of industrial food production, underwritten by cheap fossil fuels, abundant land and water resources, and a drive to maximize the global harvest of cheap calories. Ahead lie rising energy and food costs, a changing climate, declining water supplies, a growing population, and the paradox of widespread hunger and obesity.

These realities call for a radically different approach to food and agriculture. We believe that the food system must be reorganized on a foundation of health: for our communities, for people, for animals, and for the natural world. The quality of food, and not just its quantity, ought to guide our agriculture. The ways we grow, distribute, and prepare food should celebrate our various cultures and our shared humanity, providing not only sustenance, but justice, beauty and pleasure.

Governments have a duty to protect people from malnutrition, unsafe food, and exploitation, and to protect the land and water on which we depend from degradation. Individuals, producers, and organizations have a duty to create regional systems that can provide healthy food for their communities. We all have a duty to respect and honor the laborers of the land without whom we could not survive. The changes we call for here have begun, but the time has come to accelerate the transformation of our food and agriculture and make its benefits available to all.

We believe that the following twelve principles should frame food and agriculture policy, to ensure that it will contribute to the health and wealth of the nation and the world. A healthy food and agriculture policy:

1. Forms the foundation of secure and prosperous societies, healthy communities, and healthy people.
2. Provides access to affordable, nutritious food to everyone.
3. Prevents the exploitation of farmers, workers, and natural resources; the domination of genomes and markets; and the cruel treatment of animals, by any nation, corporation or individual.
4. Upholds the dignity, safety, and quality of life for all who work to feed us.
5. Commits resources to teach children the skills and knowledge essential to food production, preparation, nutrition, and enjoyment.
6. Protects the finite resources of productive soils, fresh water, and biological diversity.
7. Strives to remove fossil fuel from every link in the food chain and replace it with renewable resources and energy.
8. Originates from a biological rather than an industrial framework.

9. Fosters diversity in all its relevant forms: diversity of domestic and wild species; diversity of foods, flavors and traditions; diversity of ownership.
10. Requires a national dialog concerning technologies used in production, and allows regions to adopt their own respective guidelines on such matters.
11. Enforces transparency so that citizens know how their food is produced, where it comes from, and what it contains.
12. Promotes economic structures and supports programs to nurture the development of just and sustainable regional farm and food networks.

Our pursuit of healthy food and agriculture unites us as people and as communities, across geographic boundaries, and social and economic lines. We pledge our votes, our purchases, our creativity, and our energies to this urgent cause.

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Attachment 5: Stockton Memorandum of Agreement



Stockton
Memorandum of Agre

MEMORANDUM OF AGREEMENT

This Memorandum of Agreement ("Agreement") is entered into by and between the City of Stockton ("City"), Edmund G. Brown Jr., Attorney General of California, on behalf of the People of the State of California ("Attorney General"), and the Sierra Club, and it is dated and effective as of the date that the last Party signs ("Effective Date"). The City, the Attorney General, and the Sierra Club are referred to as the "Parties."

RECITALS

On December 11, 2007, the City approved the 2035 General Plan, Infrastructure Studies Project, Bicycle Master Plan, Final Environmental Impact Report ("EIR"), and Statement of Overriding Considerations. The General Plan provides direction to the City when making land use and public service decisions. All specific plans, subdivisions, public works projects, and zoning decisions must be consistent with the City's General Plan. As adopted in final form, the General Plan includes Policy HS-4.20, which requires the City to "adopt new policies, in the form of a new ordinance, resolution, or other type of policy document, that will require new development to reduce its greenhouse gas emissions to the extent feasible in a manner consistent with state legislative policy as set forth in Assembly Bill (AB) 32 (Health & Saf. Code, § 38500 et seq.) and with specific mitigation strategies developed by the California Air Resources Board (CARB) pursuant to AB 32[.]" The policy lists the following "potential mitigation strategies," among others, for the City to consider:

- (a) Increased density or intensity of land use, as a means of reducing per capita vehicle miles traveled by increasing pedestrian activities, bicycle usage, and public or private transit usage; and
- (b) Increased energy conservation through means such as those described in Appendix F of the State Guidelines for the California Environmental Quality Act.

The 2035 General Plan also includes other Policies and goals calling for infill development, increased transit, smart growth, affordable housing, and downtown revitalization.

In December 2006, in accordance with the requirements of the California Environmental Quality Act ("CEQA"), the City prepared and circulated a Draft EIR. Comments were received on the EIR; the City prepared responses to these comments and certified the EIR in December 2007.

On January 10, 2008, the Sierra Club filed a Petition for Writ of Mandate in San Joaquin County Superior Court (Case No. CV 034405, hereinafter "Sierra Club Action"), alleging that the City had violated CEQA in its approval of the 2035 General Plan. In this case, the Sierra Club asked the Court, among other things, to issue a writ directing the City to vacate its approval of the 2035 General Plan and its certification of the EIR, and to award petitioners' attorney's fees and costs.

The Attorney General also raised concerns about the adequacy of the EIR under CEQA, including but not limited to the EIR's failure to incorporate enforceable measures to mitigate the greenhouse gas ("GHG") emission impacts that would result from the General Plan.

The City contends that the General Plan and EIR adequately address the need for local governments to reduce greenhouse gas ("GHG") emissions in accordance with Assembly Bill 32, and associated issues of climate change.

Because the outcome of the Parties' dispute is uncertain, and to allow the Stockton General Plan to go forward while still addressing the concerns of the Attorney General and the Sierra Club, the Parties have agreed to resolve their dispute by agreement, without the need for judicial resolution.

The parties want to ensure that the General Plan and the City's implementing actions address GHG reduction in a meaningful and constructive manner. The parties recognize that development on the urban fringe of the City must be carefully balanced with accompanying infill development to be consistent with the state mandate of reducing GHG emissions, since unbalanced development will cause increased driving and increased motor vehicle GHG emissions. Therefore, the parties want to promote balanced development, including adequate infill development, downtown vitalization, affordable housing, and public transportation. In addition, the parties want to ensure that development on the urban fringe is as revenue-neutral to the City as to infrastructure development and the provision of services as possible.

In light of all the above considerations, the Parties agree as follows, recognizing that any legislative actions contemplated by the Agreement require public input and, in some instances, environmental review prior to City Council actions, which shall reflect such input and environmental information, pursuant to State law:

AGREEMENT

Climate Action Plan

1. Within 24 months of the signing of this Agreement, and in furtherance of General Plan Policy HS-4.20 and other General Plan policies and goals, the City agrees that its staff shall prepare and submit for City Council adoption, a Climate Action Plan, either as a separate element of the General Plan or as a component of an existing General Plan element. The Climate Action Plan, whose adoption will be subject to normal requirements for compliance with CEQA and other controlling state law, shall include, at least, the measures set forth in paragraphs 3 through 8, below.

2. The City shall establish a volunteer Climate Action Plan advisory committee to assist the staff in its preparation and implementation of the Plan and other policies or documents to be adopted pursuant to this Agreement. This committee shall monitor the City's compliance with this Agreement, help identify funding sources to implement this Agreement, review in a timely manner all draft plans and policy statements developed in accordance with this Agreement (including studies prepared pursuant to Paragraph 9, below), and make recommendations to the Planning Commission and City Council regarding its review. The committee shall be comprised of one representative from each of the following interests: (1) environmental, (2) non-profit community organization, (3) labor, (4) business, and (5) developer. The committee members shall be selected by the City Council within 120 days of the Effective Date, and shall serve a one-year term, with no term limits. Vacancies shall be filled in accordance with applicable City policies. The City shall use its best efforts to facilitate the committee's work using available staff resources.

3. The Climate Action Plan shall include the following measures relating to GHG inventories and GHG reduction strategies:

- a. Inventories from all public and private sources in the City:
 - (1) Inventory of current GHG emissions as of the Effective Date;
 - (2) Estimated inventory of 1990 GHG emissions;
 - (3) Estimated inventory of 2020 GHG emissions.

The parties recognize that techniques for estimating the 1990 and 2020 inventories are imperfect; the City agrees to use its best efforts, consistent with methodologies developed by ICLEI and the California Air Resources

Board, to produce the most accurate and reliable inventories it can without disproportionate or unreasonable staff commitments or expenditures.

- b. Specific targets for reductions of the current and projected 2020 GHG emissions inventory from those sources of emissions reasonably attributable to the City's discretionary land use decisions and the City's internal government operations. Targets shall be set in accordance with reduction targets in AB 32, other state laws, or applicable local or regional enactments addressing GHG emissions, and with Air Resources Board regulations and strategies adopted to carry out AB 32, if any, including any local or regional targets for GHG reductions adopted pursuant to AB 32 or other state laws. The City may establish goals beyond 2020, consistent with the laws referenced in this paragraph and based on current science.
 - c. A goal to reduce per capita vehicle miles traveled ("VMT") attributable to activities in Stockton (i.e., not solely due to through trips that neither originate nor end in Stockton) such that the rate of growth of VMT during the General Plan's time frame does not exceed the rate of population growth during that time frame. In addition, the City shall adopt and carry out a method for monitoring VMT growth, and shall report that information to the City Council at least annually. Policies regarding VMT control and monitoring that the City shall consider for adoption in the General Plan are attached to this Agreement in Exhibit A.
 - d. Specific and general tools and strategies to reduce the current and projected 2020 GHG inventories and to meet the Plan's targets for GHG reductions by 2020, including but not limited to the measures set out in paragraphs 4 through 8, below.
4. The City agrees to take the following actions with respect to a green building program:
- a. Within 12 months of the Effective Date, the City staff shall submit for City Council adoption ordinance(s) that require:

(1) All new housing units to obtain Build It Green certification, based on then-current Build It Green standards, or to comply with a green building program that the City after consultation with the Attorney General, determines is of comparable effectiveness;

(2) All new non-residential buildings that exceed 5000 square feet and all new municipal buildings that exceed 5000 square feet to be certified to LEED Silver standards at a minimum, based on the then-current LEED standards, or to comply with a green building program that the City, after consultation with the Attorney General, determines is of comparable effectiveness;

(3) If housing units or non-residential buildings certify to standards other than, but of comparable effectiveness to, Build It Green or LEED Silver, respectively, such housing units or buildings shall demonstrate, using an outside inspector or verifier certified under the California Energy Commission Home Energy Rating System (HERS), or a comparably certified verifier, that they comply with the applicable standards.

(4) The ordinances proposed for adoption pursuant to paragraphs (1) through (3) above may include an appropriate implementation schedule, which, among other things, may provide that LEED Silver requirements (or standards of comparable effectiveness) for non-residential buildings will be implemented first for buildings that exceed 20,000 square feet, and later for non-residential buildings that are less than 20,000 and more than 5,000 square feet.

(5) Nothing in this section shall affect the City's obligation to comply with applicable provisions of state law, including the California Green Building Standards Code (Part 11 of Title 24 of the California Code of Regulations), which, at section 101.7, provides, among other things, that "local government entities retain their discretion to exceed the standards established by [the California Green Building Standards Code]."

- b. Within 18 months of the Effective Date, the City staff shall submit for City Council adoption ordinance(s) that will require the reduction of the GHG emissions of existing housing units on any occasion when a permit to make substantial modifications to an existing housing unit is issued by the City.
- c. The City shall explore the possibility of creating a local assessment district or other financing mechanism to fund voluntary actions by owners of

commercial and residential buildings to undertake energy efficiency measures, install solar rooftop panels, install "cool" (highly reflective) roofs, and take other measures to reduce GHG emissions.

- d. The City shall also explore the possibility of requiring GHG-reducing retrofits on existing sources of GHG emissions as potential mitigation measures in CEQA processes.
- e. From time to time, but at least every five years, the City shall review its green building requirements for residential, municipal and commercial buildings, and update them to ensure that they achieve performance objectives consistent with those achieved by the top (best-performing) 25% of city green building measures in the state.

5. Within 12 months of the Effective Date, the City staff shall submit for City Council adoption a transit program, based upon a transit gap study. The transit gap study shall include measures to support transit services and operations, including any ordinances or general plan amendments needed to implement the transit program. These measures shall include, but not be limited to, the measures set forth in paragraphs 5.b. through 5.d. In addition, the City shall consider for adoption as part of the transit program the policy and implementation measures regarding the development of Bus Rapid Transit ("BRT") that are attached to this Agreement in Exhibit B.

- a. The transit gap study, which may be coordinated with studies conducted by local and regional transportation agencies, shall analyze, among other things, strategies for increasing transit usage in the City, and shall identify funding sources for BRT and other transit, in order to reduce per capita VMT throughout the City. The study shall be commenced within 120 days of the Effective Date.
- b. Any housing or other development projects that are (1) subject to a specific plan or master development plan, as those terms are defined in §§ 16-540 and 16-560 of the Stockton Municipal Code as of the Effective Date (hereafter "SP" or "MDP"), or (2) projects of statewide, regional, or areawide significance, as defined by the CEQA Guidelines (hereafter "projects of significance"), shall be configured, and shall include necessary street design standards, to allow the entire development to be internally accessible by vehicles, transit, bicycles, and pedestrians, and to allow access to adjacent neighborhoods and developments by all such modes of transportation.

- c. Any housing or other development projects that are (1) subject to an SP or MDP, or (2) projects of significance, shall provide financial and/or other support for transit use. The imposition of fees shall be sufficient to cover the development's fair share of the transit system and to fairly contribute to the achievement of the overall VMT goals of the Climate Action Plan, in accordance with the transit gap study and the Mitigation Fee Act (Government Code section 66000, *et seq.*), and taking into account the location and type of development. Additional measures to support transit use may include dedication of land for transit corridors, dedication of land for transit stops, or fees to support commute service to distant employment centers the development is expected to serve, such as the East Bay. Nothing in this Agreement precludes the City and a landowner/applicant from entering in an agreement for additional funding for BRT.
- d. Any housing or other development projects that are (1) subject to an SP or MDP or (2) projects of significance, must be of sufficient density overall to support the feasible operation of transit, such density to be determined by the City in consultation with San Joaquin Regional Transit District officials.

6. To ensure that the City's development does not undermine the policies that support infill and downtown development, within 12 months of the Effective Date, the City staff shall submit for City Council adoption policies or programs in its General Plan that:

- a. Require at least 4400 units of Stockton's new housing growth to be located in Greater Downtown Stockton (defined as land generally bordered by Harding Way, Charter Way (MILK), Pershing Avenue, and Wilson Way), with the goal of approving 3,000 of these units by 2020.
- b. Require at least an additional 14,000 of Stockton's new housing units to be located within the City limits as they exist on the Effective Date ("existing City limits").
- c. Provide incentives to promote infill development in Greater Downtown Stockton, including but not limited to the following for proposed infill developments: reduced impact fees, including any fees referenced in paragraph 7 below; lower permit fees; less restrictive height limits; less restrictive setback requirements; less restrictive parking requirements; subsidies; and a streamlined permitting process.

- d. Provide incentives for infill development within the existing City limits but outside Greater Downtown Stockton and excluding projects of significance. These incentives may be less aggressive than those referenced in paragraph 6.c., above.

7. Within 12 months of the Effective Date, the City staff shall submit for City Council adoption amendments to the General Plan to ensure that development at the City's outskirts, particularly residential, village or mixed use development, does not grow in a manner that is out of balance with development of infill. These proposed amendments shall include, but not be limited to, measures limiting the granting of entitlements for development projects outside the existing City limits and which are (1) subject to an SP or MDP, or (2) projects of significance, until certain criteria are met. These criteria shall include, at a minimum:

- a. Minimum levels of transportation efficiency, transit availability (including BRT) and Level of Service, as defined by the San Joaquin Council of Government regulations, City service capacity, water availability, and other urban services performance measures;
- b. Firm, effective milestones that will assure that specified levels of infill development, jobs-housing balance goals, and GHG and VMT reduction goals, once established, are met before new entitlements can be granted;
- c. Impact fees on new development, or alternative financing mechanisms identified in a project's Fiscal Impact Analysis and/or Public Facilities Financing Plan, that will ensure that the levels and milestones referenced in paragraphs 7.a. and 7.b., above, are met. Any such fees:
 - (1) shall be structured, in accordance with controlling law, to ensure that all development outside the infill areas within existing City limits is revenue-neutral to the City (which may necessitate higher fees for development outside this area, depending upon the costs of extending infrastructure);
 - (2) may be in addition to mitigation measures required under CEQA;
 - (3) shall be based upon a Fiscal Impact Analysis and a Public Facilities Financing Plan.
- d. The City shall explore the feasibility of enhancing the financial viability of infill development in Greater Downtown Stockton, through the use of such mechanisms as an infill mitigation bank.

8. The City shall regularly monitor the above strategies and measures to ensure that they are effectively reducing GHG emissions. In addition to the City staff reporting on VMT annually, as provided in paragraph 3.c., the City staff or the advisory committee shall report annually to the City Council on the City's progress in implementing the strategies and measures of this Agreement. If it appears that the strategies and measures will not result in the City meeting its GHG reduction targets, the City shall, in consultation with the Attorney General and Sierra Club, make appropriate modifications and, if necessary, adopt additional measures to meet its targets.

Early Climate Protection Actions

9. To more fully carry out those provisions of the General Plan, including the policy commitments embodied in those General Plan Policies, such as General Plan Policy HS-4.20, intended to reduce greenhouse gas emissions through reducing commuting distances, supporting transit, increasing the use of alternative vehicle fuels, increasing efficient use of energy, and minimizing air pollution, and to avoid compromising the effectiveness of the measures in Paragraphs 4 through 8, above, until such time as the City formally adopts the Climate Action Plan, before granting approvals for development projects (1) subject to an SP or MDP, or (2) considered projects of significance, and any corresponding development agreements, the City shall take the steps set forth in subsections (a) through (d) below:

(a) City staff shall:

- (1) formulate proposed measures necessary for the project to meet any applicable GHG reduction targets;
- (2) assess the project's VMT and formulate proposed measures that would reduce the project's VMT;
- (3) assess the transit, especially BRT, needs of the project and identify the project's proposed fair share of the cost of meeting such needs;
- (4) assess whether project densities support transit, and, if not, identify proposed increases in project density that would support transit service, including BRT service;

- (5) assess the project's estimated energy consumption, and identify proposed measures to ensure that the project conserves energy and uses energy efficiently;
- (6) formulate proposed measures to ensure that the project is consistent with a balance of growth between land within Greater Downtown Stockton and existing City limits, and land outside the existing City limits;
- (7) formulate proposed measures to ensure that City services and infrastructure are in place or will be in place prior to the issuance of new entitlements for the project or will be available at the time of development; and
- (8) formulate proposed measures to ensure that the project is configured to allow the entire development to be internally accessible by all modes of transportation.
- (b) The City Council shall review and consider the studies and recommendations of City staff required by paragraph 9(a) and conduct at least one public hearing thereon prior to approval of the proposed project (though this hearing may be folded into the hearing on the merits of the project itself).
- (c) The City Council shall consider the feasibility of imposing conditions of approval, including mitigation measures pursuant to CEQA, based on the studies and recommendations of City staff prepared pursuant to paragraph 9(a) for each covered development project.
- (d) The City Council shall consider including in any development approvals, or development agreements, that the City grants or enters into during the time the City is developing the Climate Action Plan, a requirement that all such approvals and development agreements shall be subject to ordinances and enactments adopted after the effective date of any approvals of such projects or corresponding development agreements, where such ordinances and enactments are part of the Climate Action Plan.
- (e) The City shall complete the process described in paragraphs (a) through (d) (hereinafter, "Climate Impact Study Process") prior to the first discretionary approval for a development project. Notwithstanding the foregoing, however, for projects for which a draft environmental impact report has circulated as of the Effective Date, the applicant may request that the City

either (i) conduct the Climate Impact Study Process or (ii) complete its consideration of the Climate Action Plan prior to the adoption of the final discretionary approval leading to the project's first phase of construction. In such cases, the applicant making the request shall agree that nothing in the discretionary approvals issued prior to the final discretionary approval (i) precludes the City from imposing on the project conditions of approvals or other measures that may result from the Climate Impact Study Process, or (ii) insulates the project from a decision, if any, by the City to apply any ordinances and/ or enactments that may comprise the Climate Action Plan ultimately adopted by the City.

Attorney General Commitments

10. The Attorney General enters into this Agreement in his independent capacity and not on behalf of any other state agency, commission, or board. In return for the above commitments made by the City, the Attorney General agrees:

- a. To refrain from initiating, joining, or filing any brief in any legal challenge to the General Plan adopted on December 11, 2007;
- b. To consult with the City and attempt in good faith to reach an agreement as to any future development project whose CEQA compliance the Attorney General considers inadequate. In making this commitment, the Attorney General does not surrender his right and duties under the California Constitution and the Government Code to enforce CEQA as to any proposed development project, nor his duty to represent any state agency as to any project;
- c. To make a good faith effort to assist the City in obtaining funding for the development of the Climate Action Plan.

Sierra Club Commitments

11. The Sierra Club agrees to dismiss the Sierra Club Action with prejudice within ten (10) days of the Effective Date. Notwithstanding the foregoing agreement to dismiss the Sierra Club Action, the City and Sierra Club agree that, in the event the City should use the EIR for the 2035 General Plan in connection with any other project approval, the Sierra Club has not waived its right (a) to comment upon the adequacy of that EIR, or (b)

to file any action challenging the City's approval of any other project based on its use and/or certification of the EIR.

General Terms and Conditions

12. This Agreement represents the entire agreement of the Parties, and supercedes any prior written or oral representations or agreements of the Parties relating to the subject matter of this Agreement.

13. No modification of this Agreement will be effective unless it is set forth in writing and signed by an authorized representative of each Party.

14. Each Party warrants that it has the authority to execute this Agreement. Each Party warrants that it has given all necessary notices and has obtained all necessary consents to permit it to enter into and execute this Agreement.

15. This Agreement shall be governed by and construed in accordance with the laws of the State of California.

16. This Agreement may be executed in counterparts, each of which shall be deemed an original. This Agreement will be binding upon the receipt of original, facsimile, or electronically communicated signatures.

17. This Agreement has been jointly drafted, and the general rule that it be construed against the drafting party is not applicable.

18. If a court should find any term, covenant, or condition of this Agreement to be invalid or unenforceable, the remainder of the Agreement shall remain in full force and effect.

19. The City agrees to indemnify and defend the Sierra Club, its officers and agents (collectively, "Club") from any claim, action or proceeding ("Proceeding") brought against the Club, whether as defendant/respondent, real party in interest, or in any other capacity, to challenge or set aside this Agreement. This indemnification shall include (a) any damages, fees, or costs awarded against the Club, and (b) any costs of suit, attorneys' fees or expenses incurred in connection with the Proceeding, whether incurred by the Club, the City or the parties bringing such Proceeding. If the Proceeding is brought against both the Club and the City, the Club agrees that it may be defended by counsel for the City, provided that the City selects counsel that is acceptable to the Club; the Club may not unreasonably withhold its approval of such mutual defense counsel.

20. The City shall pay Sierra Club's attorney's fees and costs in the amount of \$157,000 to the law firm of Shute, Mihaly & Weinberger LLP as follows: \$50,000 within 15 days of dismissal of the Sierra Club Action, and (b) the balance on or before January 30, 2009.

21. Any notice given under this Agreement shall be in writing and shall be delivered as follows with notice deemed given as indicated: (a) by personal delivery when delivered personally; (b) by overnight courier upon written verification of receipt; or (c) by certified or registered mail, return receipt requested, upon verification of receipt. Notice shall be sent as set forth below, or as either party may specify in writing:

City of Stockton:
Richard E. Nosky, City Attorney
425 N. El Dorado Street, 2nd Floor
Stockton, CA 95202

Attorney General's Office
Lisa Trankley
Susan Durbin
Deputy Attorneys General
1300 I Street, P.O. Box 944255
Sacramento, CA 94255-2550

Sierra Club:
Aaron Isherwood
Environmental Law Program
85 Second Street, 2nd Floor
San Francisco, CA 94105

Rachel Hooper
Amy Bricker
Shute, Mihaly & Weinberger
396 Hayes Street
San Francisco, CA 94102

22. Nothing in this Agreement shall be construed as requiring the City to relinquish or delegate its land use authority or police power.

(SIGNATURES ON FOLLOWING PAGE)

In witness whereof, this Agreement is executed by the following:

PEOPLE OF THE STATE OF CALIFORNIA
BY AND THROUGH ATTORNEY GENERAL
EDMUND G. BROWN JR.

Lisa Frankley

DATED: 10/14/08

ATTEST:

[Signature]
KATHERINE GONG MEISS
City Clerk of the City of Stockton



CITY OF STOCKTON,
a municipal corporation

[Signature]
J. GORDON PALMER, JR.
City Manager

APPROVED AS TO FORM:

DATED 9/25/08

[Signature]
RICHARD E. NOSKY, JR.
City Attorney

DATED 9-9-08

THE SIERRA CLUB

BARBARA WILLIAMS, CHAIR
MOTHER LODGE CHAPTER

DATED _____

In witness whereof, this Agreement is executed by the following:

PEOPLE OF THE STATE OF CALIFORNIA
BY AND THROUGH ATTORNEY GENERAL
EDMUND G. BROWN JR.

DATED: _____

ATTEST:

CITY OF STOCKTON,
a municipal corporation

KATHERINE GONG MEISSNER
City Clerk of the City of Stockton

J. GORDON PALMER, JR.
City Manager

APPROVED AS TO FORM:

DATED _____

RICHARD E. NOSKY, JR.
City Attorney

DATED _____

THE SIERRA CLUB


BARBARA WILLIAMS, CHAIR
MOTHER LODGE CHAPTER

DATED 10/11/08

EXHIBIT A

Policy Re: VMT Monitoring Program

The City's policy is to monitor key City-maintained roadways to estimate Vehicle Miles Traveled (VMT) by single-occupant automobile per capita on an annual basis, to be submitted as an annual report to the City Council. The estimate of citywide VMT should be developed in cooperation with the San Joaquin Council of Governments ("SJCOG"), by augmenting local City data with VMT estimates from SJCOG and Caltrans for the regional Congestion Management Plan network. The estimated change in annual VMT should be used to measure the effectiveness of jobs/housing balance, greenhouse gas emission reduction, and transit plans and programs.

Implementation Program

In order to develop an annual estimate of citywide VMT, the City should augment local City data with VMT estimates from SJCOG and Caltrans for regional facilities, or adopt other methodologies to estimate citywide VMT that are approved in concept by the two agencies. For purposes of calculating annual changes in VMT, the annual estimate of VMT should subtract out the estimates of regional truck and other through traffic on the major freeways (I-5, SR 4, SR 99).

Policy Re: Reduce Growth in VMT

The City's policy is to achieve the following fundamental goals to regulate vehicle emissions and reduce greenhouse gas emissions, improve jobs/housing balance, and increase transit usage over the duration of this General Plan: Reduce the projected increase in VMT by single-occupant automobile per capita to an annual rate over the planning period that is equal to or less than the population increase (this goal is also required for the City to receive funding through the Measure K/Congestion Management Plan program).

Implementation Program

In order to keep annual increases in VMT to a rate equal to or less than population increases, the following trip reduction programs should be considered by the City: increased transit service (Bus Rapid Transit) funded through new development fees; planning all future housing development to be in the closest possible proximity to existing and planned employment centers; provision of affordable housing; creation of higher density, mixed use and walkable communities and development of bicycle and pedestrian trails; and other proven programs.

Implementation Program

If the City goal of reducing the projected increase in VMT to an amount equal to or less than the population increase, and increase transit usage, is not met for two or more years during each five-year cycle of VMT monitoring, the City should consider adoption of the following programs, among others:

Adopt more vigorous economic development programs with funding for staff; and
Slow the rate of approvals of building permits for housing developments.

EXHIBIT B

Policy Re: Bus Rapid Transit

The City's policy is to vigorously support efforts to develop Bus Rapid Transit (BRT) within and beyond Stockton as a major priority of its General Plan, in order to increase overall transit usage over time. Based on an updated transit study, the City should plan for and provide BRT service running along key north-south routes as a first priority: Pacific Avenue; El Dorado Street; West Lane/Airport Way, Pershing Avenue. BRT service along key east-west corridors should also be provided. Transit use goals should be approved and monitored by the City over the planning period.

Implementation Program

In order to fund the initial capital and operating costs for BRT along major north-south arterials, the City should consider adoption of a comprehensive new development BRT fee program that requires new growth to significantly fund BRT, following a study consistent with the requirements of State law. The new development BRT fee program should ensure that "greenfield" projects approved at the fringe of the City pay a fee that represents the full cost of providing BRT service to the new housing; infill development may be granted a reduced BRT fee based on the reduced distance of service provided to the inner city areas.

Implementation Program

In order to augment the new development funding of the initial capital and operating costs for BRT, the City should strongly advocate for Measure K funding and should seriously consider placing an initiative on the ballot to receive voter approval for additional funding from existing residents and businesses.

Implementation Program

The City should establish transit use goals that set specific targets (e.g., transit mode split percentage of total trips and bus headways) that represent an increase in public transportation ridership and level of service over current levels by 2012 and then another increase by 2018.

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CITY OF STOCKTON

OFFICE OF THE CITY MANAGER

City Hall • 425 N. El Dorado Street • Stockton, CA 95202-1997 • 209/937-8212 • Fax 209/937-7149
www.stocktongov.com

October 7, 2008

Alliance for Responsible Planning
6507 Pacific Avenue
Box 339
Stockton, CA 95207

SETTLEMENT AGREEMENT WITH ATTORNEY GENERAL AND SIERRA CLUB

As you are aware, on September 9, 2008, the City of Stockton approved a Memorandum of Agreement with the Sierra Club and the California Attorney General's Office resolving litigation over the City's 2035 General Plan. The Alliance for Responsible Planning and other interested parties have raised questions about the parties' interpretation of the Agreement and the public process that the City plans to follow in carrying out the Agreement. To help answer these questions, below we clarify our interpretation of the Agreement and also elaborate on the public process that the City will follow in implementing the provisions of the Agreement. We understand that the other parties to the Agreement concur in these views. Note that many of the statements below reiterate points that were made in the City's Resolution adopted in connection with its approval of the Agreement and in statements made by the parties during the August 26, 2008, and September 9, 2008, City Council hearings about the Agreement:

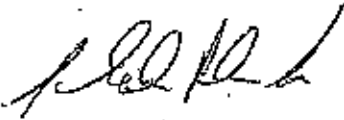
1. The parties understand and acknowledge the importance of public involvement in the process of developing the General Plan, and encourage the continued significant involvement of the public in the development of greenhouse gas reduction policies. The City intends to provide for public involvement in the development of the programs, policies, General Plan amendments and ordinances proposed by the Agreement. The City also will provide reasonable notification to the public of all Advisory Committee, Planning Commission and City Council meetings involving consideration of the issues provided for by the Agreement. It is the City's expectation to expand the composition of the Climate Action Advisory Committee to include a total of two representatives from each of the following interests: (1) environmental, (2) non-profit community organization, (3) labor, (4) business, and (5)



developer. The City will fully comply with CEQA in connection with the development of the programs, policies, General Plan amendments and ordinances proposed by the Agreement.

2. The parties understand and acknowledge that the public review process and compliance with CEQA may require additional time beyond designated time periods to ensure the full involvement of the public in the consideration of the Climate Action Plan, green building program and transit study and to ensure full compliance with CEQA.
3. The parties understand and acknowledge that the adoption of the programs, policies, General Plan amendments and ordinances proposed by the Agreement are discretionary legislative acts and the City is not required by the terms of the Agreement to adopt any particular program, policy, General Plan amendment or ordinance. In addition, nothing in the Agreement shall limit or restrict the right of the City to modify, alter, or rescind any particular program, policy, General Plan amendment or ordinance following the adoption of such program, policy, General Plan amendment or ordinance. Although the Agreement requires City staff to present to the City Council certain programs, policies, General Plan Amendments and ordinances for its consideration, nothing in the Agreement limits or restricts City staff from providing to the City Council additional, alternative recommendations for such programs, policies, General Plan amendments and ordinances based on staff professional judgment, public input and CEQA review.
4. The parties understand and acknowledge that if there is an instance in which the terms of the written Agreement are unclear, the Resolution adopted by the City Council on September 9, 2008, and the statements made by the Attorney General's office, the Sierra Club and our City Attorney and the City's outside counsel at the August 26 and September 9, 2008, City Council hearings provide a legislative history pursuant to which the Agreement should be interpreted.
5. The parties understand and acknowledge that:
 - (i) upon consideration of a Climate Action Plan (CAP) by the Council, the City's obligations under Agreement paragraphs 3 through 7 will be discharged,
 - (ii) upon adoption of a CAP, the City's obligations under Agreement paragraph 9 will be discharged, and
 - (iii) upon inclusion of a program in the CAP to regularly monitor and, if appropriate, modify the City's strategies and measures to meet the Greenhouse Gas reduction targets that may be adopted in the

CAP, the City's obligations under paragraph 8 will be discharged. Nothing in this paragraph 5 is intended to contradict our clarification in paragraph 3, above, that the City retains full legislative discretion with respect to any policies, programs and ordinance it may adopt as part of a CAP.



J. GORDON PALMER, JR.
CITY MANAGER

JGP:REN:cn

cc: Edward J. Chavez
Richard E. Nosky, Jr.
George Mihlsten (Via e-mail)
Cliff Rechtschaffen (Via e-mail)
Rachel Hooper (Via e-mail)

EDMUND G. BROWN JR.
Attorney General

State of California
DEPARTMENT OF JUSTICE



1515 CLAY STREET
P.O. BOX 70550
OAKLAND, CA 94612-0550
Public: 510-622-2260
Telephone: 510-622-2260
Facsimile: 510-622-2270
E-Mail: Cliff.Rechtschaffen@doj.ca.gov

October 7, 2008

Alliance for Responsible Planning
6507 Pacific Avenue
Box 339
Stockton, CA 95207

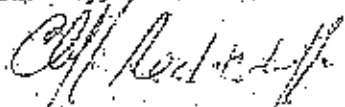
RE: Stockton General Plan Settlement
Clarification Letters

Dear Alliance Members:

The Attorney General's Office has read the letter from Stockton City Manager Gordon Palmer to the Alliance for Responsible Planning (copy attached). We concur in the City's interpretation and understanding of the Memorandum of Agreement as set forth in the letter.

If you have questions, please contact the undersigned.

Sincerely,


CLIFF RECHTSCHAFFEN
Special Assistant Attorney General

For EDMUND G. BROWN JR.
Attorney General

SHUTE, MIHALY & WEINBERGER LLP
ATTORNEYS AT LAW

E. CLEMENT SHUTE, JR.
MARK I. WEINBERGER (1848-2008)
FRAN M. LAYTON
RACHEL B. HOOPER
ELLEN J. GARBER
TAMARA S. GALANTER
ANDREW W. SCHWARTZ
ELLISON FOLK
RICHARD S. TAYLOR
WILLIAM J. WHITE
ROBERT S. PERLMUTTER
DGA L. WOLFF
MATTHEW D. ZINN
CATHERINE C. ENGBERG
AMY J. BRICKER
GABRIEL M.B. ROSS
DEBORAH L. KEETH
WINTER KING
KEVIN P. BUNDY
SENIOR COUNSEL

396 HAYES STREET
SAN FRANCISCO, CALIFORNIA 94102
TELEPHONE: (415) 552-7272
FACSIMILE: (415) 552-5815
WWW.SMWLAW.COM

ANANDA R. GARCIA
JEANNETTE M. MACMILLAN
ISAAC H. SOWERS
HEATHER M. MINNER
ERIN S. CHALMERS

LAUREL L. IMPETT, AICP
CARMEN J. BORG, AICP
URBAN PLANNERS

October 7, 2008

Via U.S. Mail

Alliance for Responsible Planning
6507 Pacific Avenue
Box 339
Stockton, CA 95207

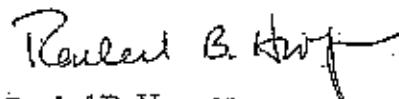
Re: Stockton General Plan Settlement
Clarification Letters

Dear Alliance:

On behalf of the Sierra Club, we have read the letter from Stockton City Manager Gordon Palmer to the Alliance for Responsible Planning (copy attached). The Sierra Club concurs in the City's interpretation and understanding of the Memorandum of Agreement as set forth in the letter.

SHUTE, MIHALY, & WEINBERGER LLP

Yours very truly,


Rachel B. Hooper

Enclosure

\\smw\vol1_data\SIERRA\GPL\IT\Sierra Club letter of concurrence.doc

Alliance for Responsible Planning

8507 Pacific Avenue
Box 338
Stockton, CA 95207

October 7, 2008

Honorable Mayor Ed Chavez and City Councilmembers
425 N. El Dorado St, 2nd Floor
Stockton, CA 95202

Honorable Mayor and Councilmembers:

We are pleased to receive a copy of a letter from Gordon Palmer, City Manager, outlining a series of clarifications regarding the Memorandum of Agreement entered into by the City with the Attorney General and the Sierra Club. The letter from Mr. Palmer sets forth important clarifications to the Agreement which have been concurred in by the Attorney General and the Sierra Club.

These clarifications provide clear assurances to the Alliance and the public as to a number of critical issues that have been of concern to the Alliance. In particular, the letter makes very clear the importance of significant public involvement in the consideration of a Climate Action Plan. We strongly support the possible expansion of the number of members of the proposed Advisory Committee and look forward to participating in that process.

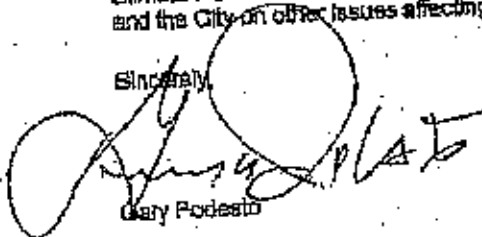
In addition, the Alliance agrees that alternative recommendations can be presented to the City Council based on public input and the California Environmental Quality Act. This helps to ensure the credibility of the public process. Lastly, the letter underscores the clear understanding of the parties to the Agreement that the adoption of a Climate Action Plan is in the legislative discretion of the City.

In light of the discussions undertaken in good faith among the parties and the Alliance, the statements made in Mr. Palmer's letter, and the concurrence of the Attorney General and the Sierra Club to the letter from the City Manager, we have decided to withdraw our effort to seek a referendum of the Agreement pursuant to the authorization contained in Section 9604 of the Elections Code. These statements by the City and the other parties address the core issues we have heard from the community. In accordance with section 9604, we will provide written notice to the City Clerk of the withdrawal of the referendum. In addition, we will not be pursuing a legal challenge to the adoption of the Agreement by the City nor will we promote or fund any individuals or entities challenging the adoption of the Agreement or promoting a referendum of the Agreement. We, of course, reserve our rights to challenge the implementation of the Agreement.

We are proud of the 25,000 Stocktonians who participated in this process. We thank the City Manager, the City Attorney, the Attorney General and the Sierra Club for providing these clarifications. It is sincerely appreciated.

We look forward to working with the City and the community in undertaking development of a Climate Action Plan. In addition, the Alliance looks forward to continuing to work with the community and the City on other issues affecting the City's future.

Sincerely,



Gary Podesta



October 7, 2008

Honorable Mayor Ed Chavez and Councilmembers
425 N. El Dorado St., 2nd Floor
Stockton, CA 95202

Honorable Mayor and Councilmembers:

We have had a chance to review the letter from the City Manager dated October 7, 2008 and letters from the Attorney General and the Sierra Club. These letters provide a number of critical clarifications with respect to the Memorandum of Agreement approved by the City on September 9, 2008.

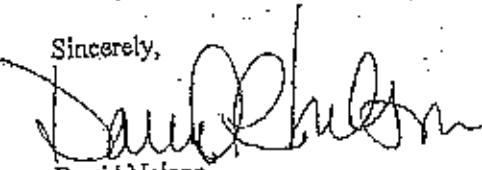
In particular:

- o All parties have recognized the need for significant community involvement in the consideration of a Climate Action Plan. The A.G. Spanos Companies strongly supports the City's stated expectation to expand the number of members of the proposed Advisory Committee, and we look forward to participating in that process.
- o Second, all parties have it clear that alternative recommendations can be presented to the City Council based on public input and the California Environmental Quality Act. This helps to ensure the credibility of the public process.
- o Finally, all parties to the Agreement acknowledge that the adoption of a Climate Action Plan is in the legislative discretion of the City.

In light of these statements by Mr. Palmer and the concurrence of the other parties regarding a significant public process and assurances regarding the independent discretion of the City in developing and considering a Climate Action Plan, we will not be pursuing a legal challenge to the adoption of the Agreement by the City and will not fund or support any efforts by any other individuals or entities to file a legal challenge to the adoption of the Agreement or to seek a referendum with regard to the adoption of the Agreement. We, of course, reserve our rights to challenge the implementation of the Agreement.

We look forward to working with the community and the City in developing a Climate Action Plan. We are prepared to work with the City and the Alliance to develop a comprehensive public outreach program to ensure the community's significant involvement in the process.

Sincerely,



David Nelson

A.G. Spanos Companies

GENERAL PLAN RECOMMENDED CHANGES
Bill Weber DAC member

Jobs /Housing Balance:

Goal: Build into planned development the ability to establish a sustainable jobs/housing balance. Allow for employers to have commercial / industrial space with a business friendly atmosphere to provide high quality jobs for the community's residents. Insure jobs follow residence to establish a balanced, sustainable community with incomes to match housing cost and reduce commute miles and vehicle traffic impacts.

Action: Allow development of 2000 housing units providing an ample workforce. Allow and encourage commercial / industrial development to provide at least 50% of the target 1.2 jobs per housing units before further development can be permitted. As jobs come to the community further development phases can be permitted balancing the 50% of 1.2 jobs per housing unit target. Plan and build for full balance of 1.2 jobs per housing unit upon buildout. The full balance of 1.2 jobs per housing unit shall be designed into all phases of construction.

Add these goals and policies to Dunnigan Specific Plan as well as other unincorporated planned development projects. This would be in addition to CC-3.3 referencing the Jobs / Housing balance concept. CC-3.3 could use some quantitative limits.

Water:

Omit policy CO-5.3 Which states " Strive to manage County's groundwater resources on a sustainable yield basis" that encourages water management. Problem needs to be accurately identified before solution is implemented. Best left to water districts.

Change wording on CO-5.14 to read Proposals for land use be required to demonstrate that ground water recharge will not be significantly impacted. Exceptions for agriculture, open space and habitat. Current wording is confusing.

Omit action CO-A68 which states " Update and implement the Integrated Regional Water Management Plan" until an amicable water management plan is drafted.

Omit CO-A78 which states " Develop and adopt a groundwater management ordinance" until groundwater ordinance is drafted. Should not include items to be determined at a later time.

Omit CO-A85 which states " Adopt an ordinance to allow for roof catchment and use of rainwater" . Could read encourage roof catchment instead of adopt an ordinance.

David Morrison

67.

From: Brian Weiss [bgweiss@gmail.com]

Sent: Monday, October 13, 2008 3:51 PM

To: David Morrison

Subject: Comment re Support for a Blue Ridge Trail in the Open Space Element of the General Plan

Hi Mr. Morrison,

I've heard news that a landowner has very graciously granted the county a hiking easement on land along the Blue Ridge to the West of Yolo County; and that this evening there will be a Parks, Recreation, and Wildlife Advisory Committee meeting focusing on the Open Space Element of the General Plan and specifically discussing the construction of a trail along the ridge.

Alas, I can not attend the meeting, but please note this email expresses **my great support for this endeavor**, and as a hiker and avid outdoorsman for the last decade and a half in Yolo County, I can't believe my excitement. I understand that there are some in the community that have long considered the landlocked BLM land atop Berryessa Peak to be a private hunting reserve for those with access via private land -- construction linking up with the Ada Merhoff trail between the Cache Creek Park and Fiske and Lowery Peaks will permit all in the community to enjoy the resources of the county.

I personally look forward to one day soon assisting in cutting brush and moving rocks to help complete the Blue Ridge trail linking Putah and Cache Creeks.

Best regards,
Brian Weiss

503 E St.
Davis, CA 95616

--
31647026933025bgweiss@gmail.com7152511

68.

David Morrison

From: Jim Wirth [jwirth@naibt.com]
Sent: Saturday, October 11, 2008 11:11 AM
To: tschudin@cwnet.com; David Morrison
Cc: Matt Rexroad - Dist. 3; Duane Chamberlain; helen.thompson@yolocounty.org; Mike McGowan
Subject: Blue Ridge Trail

Heidi & David: I've reviewed the Draft General Plan and this email is focused on a specific section of the Conservation and Open Space Element and the promotion of trail corridors through private property. When this matter was raised several years ago...when the Parks & Recreation Plan surfaced, I was led to believe that this would not be advanced into documents like the GP. If approved, this gives other agencies the green light as it indicates County support of the Blue Ridge Trail through private property and opens the door to eminent domain takings. As a member of a family that owns rangeland on this specific route along Blue Ridge (that is shown on the exhibit CO-2). I am opposed to this public trail through private property. We have commercial business interests on the ridge through licensing of access to Berryessa Peak for communication purposes and we have enough trespass, security and vandalism issues as it is. We also lease the rangeland to livestock operations and provide for recreational opportunities like managed hunting clubs and are very concerned about the impacts on our private use and enjoyment of our property. This is being promoted by a few hard-core hikers that have been sitting on your P & R committee. The county should have a better understanding of the physical constraints of this trail and we should have engineered surveys of BLM lands and topography overlays and the precise route is identified for such a trail before advancing this notion and putting your public stamp of approval on the trail in this context. Bottom line, this opens us up to federal or state taking as it implies forever that the county is supportive of such efforts and they are in broad compliance with our GP. I suggest the county would be wise to use your funds and energies on building parks for kids in our existing communities instead of this notion which only a few may utilize. These hikers never even call us for access. We should someday get all the interests together and do some specific planning but until then please remove the Blue Ridge Trail system from the General Plan.

Jim Wirth
Land - Agriculture
520 Capitol Mall, Suite 500
Sacramento, CA 95814
Direct 916-617-4248 Mobile 530-908-2605
Efax 530-309-4733

NAIBT Commercial

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Committed to Northern California. Connected to the world.™

Yolo Audubon Society
P.O. Box 886 Davis, CA 95617



20 November 2008

David Morrison
Assistant Director -- Development Services
Yolo County Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95695

Subject: Comments Concerning the Conservation Element of the Yolo County 2030 General Plan Update

Dear Mr. Morrison,

The County is embarked upon a momentous undertaking, the development and adoption of a General Plan that will guide land use and related decision-making in the County for 20 years or more. In the following letter the Board of Directors of the Yolo Audubon Society (YAS) present selected comments about the content and focus of the Draft Plan, primarily those being the policies and implementation measures in the Conservation Element, the portion of the plan most of interest and concern to the YAS.

The comments in this letter specifically incorporate the comments that the YAS has sent to the County previously about the General Plan Update; these prior comments are attached to this letter for your convenience. The concerns that were identified in the previous comments remain as concerns at the present time owing to the generalized nature of the conservation framework included in the Conservation Element and the uncertainty that the conservation plans that are being prepared by the Yolo Natural Heritage Program (YNHP) will be implemented at any time in the future (see below).

The policy framework included in the Draft Conservation Element is superior to the policy framework identified in the County's existing General Plan Conservation Element. However, the policy framework included in the Draft Update document does not rise to the requirements of being a conservation plan for significant ecological resources that have existed, exist now, or could be restored to exist within the County. Conservation-related policies are not given a necessary operational element that would assure that the identified policies will actually protect conservationally significant resources or would result in their restoration or enhancement. We offer some suggestions below as to how this lack of focus could be remedied.

For the most part our comments at the present time are focused on the policy framework in the "Biological Resources" section of the Draft Conservation Element; however, this does not mean that we do not have concerns about the policies in the "Natural Open Space," "Water Resources," and "Delta Region" sections of the Element. We request that the commentary presented below be applied as broadly as possible throughout the Draft Conservation Element to operationally strengthen the conservation focus of the entire Element.

A. Goal CO-2: Biological Resources

The YAS does not find the goal statement that motivates all biological conservation planning in the General Plan Update to be adequately structured as a conservation goal. Rather than the goal statement currently included in the Draft Element, we request that the goal statement be amended to the following:

GOAL CO-2 **Biological Resources. Maintain, enhance, and restore the attributes and processes in the Yolo County landscape that will sustain the ecological integrity of and the fullest range of natural biological diversity achievable in the California region that includes the County.**

The existing goal statement is significantly flawed as a conservation planning goal, because it focuses almost entirely on "sensitive" species. Focusing on "sensitive" species essentially focuses the County's conservation planning on an element of the natural environment that is already "broken" and in need of restoration, while not addressing the maintenance of environment conditions that sustain ecosystem functions and thus the protection of both all other species and the ecosystem processes themselves. A primary precept of conservation planning is that an appropriate conservation focus is the maintenance of all elements of the natural environment in circumstances that sustain the highest natural biological diversity as may be achieved in a region. This focus is appropriately known as maintaining the ecological integrity of the natural environment.

The YAS specifically requests that the County include the following policy (and/or Implementation Element) in Part D of the Draft Conservation Element:

Policy (Implementation Element) CO-X. Maintain biological and ecological integrity.

Maintaining ecological balance, system function, biological integrity, and natural diversity is the primary focus of the Conservation Element. Protecting ecological functions of natural habitats, and natural drainage and infiltration processes, will enhance natural ecosystems in the planning area. Ecological system functions, elements, and processes are maintained through the following measures:

- 1. The structure and composition of ecological systems within the County shall contain the same native plant and animal species, in the same relative abundances and proportions, which are found in the least-disturbed natural ecosystems in the planning area.*
- 2. The ecological functions performed by ecological systems in the County shall resemble the functions of the least-disturbed natural ecosystems in the planning area.*
- 3. Ecological systems and natural processes shall not be disrupted by exotic organisms to a significant degree.*
- 4. Ecological systems and natural processes shall not be disrupted by land use activities to a significant degree.*
- 5. An "adaptive management" approach shall be utilized to maintain ecological and biological integrity, including monitoring the status of ecological systems in the County and adjusting County implementation of this General Plan in order to more closely approximate the conditions provided in the planning area's least-disturbed natural ecosystems.*

David Morrison

YAS Comments Concerning the Conservation Element of the Yolo County 2030 General Plan Update

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The incorporation of this policy focus will result in a Conservation Element that is actually directed to the conservation of native ecosystem elements, thereby incorporating the needs of both "sensitive" species and their habitats as well as other native species that are currently common enough not to be identified as "sensitive." This focus will effectively work toward "keeping common native species common," a good metric for a functional conservation policy.

The YAS also specifically requests that the County add the following additional policy (and/or implementation element) to Part D of the Draft Conservation Element:

Policy (Implementation Element) CO-X. Ecosystem-based management as core tenet for General Plan

The County shall adopt and shall actively focus its implementation of the General Plan on protecting, maintaining, and enhancing the biological, physical, hydrological, and human-oriented characteristics of the County's ecosystems. These ecosystems include the County's landscape and watersheds, and management actions that affect any part of this ecosystem complex are recognized as affecting all parts of the complex. The General Plan recognizes that effects on ecosystem processes and structural elements may be significant even if indirect or attenuated. Decisions regarding the landscape management throughout the County shall incorporate the understanding that the integrity of the County's ecosystem elements determines many of the values that are important to the County's citizens.

The elements of ecosystem-based management have been identified by the Minnesota Department of Natural Resources (URL: http://www.dnr.state.mn.us/ecological_services/ebm/index.html) as:

"Ecosystem-based management relies on the following key principles:

"Partnerships and citizen participation. Work together with citizens, landowners, businesses, local governments, interest organizations, and other agencies to face problems, identify opportunities and find common solutions.

"Science-based approach. Use the best available scientific knowledge (social, economic, and ecological) as a foundation for decision-making; understand natural resource interrelationships, and focus on sustainability of whole ecological systems.

"Long-term view. Establish long-term goals for desired ecosystem conditions that maintain the capacity of the land to sustain public benefits and opportunities into the future.

"Comprehensive perspective. Find solutions that support economic prosperity, lasting livelihoods, and ecological health."

The YAS requests that the County adopt this approach for the Conservation Element, and for the General Plan Update as a whole, and requests that the CEQA document assess the impacts that stem from not adopting the approach.

B. Conservation Planning in the Context of the General Plan

The Draft Conservation Element includes a basic policy approach that says, in effect, that the Conservation Element needs for Yolo County will be satisfied by the generalized policies in the

Conservation Element, supplemented by the content of the Natural Communities Conservation Plan/Habitat Conservation Plan (NCCP/HCP) that may be developed by the YNHP. This approach has two important flaws that need to be corrected if the Conservation Element is to meet the needs of Yolo County's citizens and its natural landscape.

The first is that the NCCP/HCP may never be developed or implemented, and therefore any reliance that the Conservation Element places on those future plans for satisfying the conservation planning needs of the General Plan is improper. In addition, while the intention of the NCCP/HCP is to incorporate the conservation needs of the Yolo County landscape as a whole, the NCCP/HCP must by law be structured to meet the conservation needs of the species covered by the plans, rather than addressing the conservation needs of the natural landscape in the County and the region. The landscape conservation objective is *supposed* to be addressed by the Conservation Element of the General Plan. Please be explicit and comprehensive in addressing how the Conservation Element will be revised to incorporate a landscape-based conservation planning focus that will fully meet all of the state's General Plan requirements without any reliance on the work products of the YNHP.

The second significant problem established by the Draft Conservation Element is that it relies on other County "plans" for results that are actually intended by general plan law to be addressed by the Conservation Element. For example, the Draft Element includes a functional reliance on the County's Oak Woodlands Conservation Plan to identify planning approaches that will protect oak woodlands. However, the Oak Woodlands Conservation Plan is not actually an oak woodlands conservation plan. It contains no framework for conserving actual oak woodlands that exist in Yolo County today, and it provides no "structure" leading to an actual conservation program for real, on-the-ground oak woodlands in the future. In fact, the Oak Plan does not evaluate the conservation significance of various existing oak woodland resources in the County in a way that would allow for making informed judgements about conserving specific oak woodland areas, as an "oak woodland conservation plan" should do.

While the Oak Plan recommends the development of practices that might, if broadly applied, maintain oak woodland conservation values in selected sites, it includes no goal, policy, or recommendation that would lead to identifying programs or practices that would maintain, restore or enhance oak woodland conservation values broadly within the County's overall landscape setting in order to restore the oak woodland conservation values that (as documented in the Plan) have been lost from Yolo County during the past 150 years. What the Oak Woodlands Conservation Plan should have done, but does not do, is to specify a program to identify and implement countywide oak woodlands management to *increase* the conservation values in Yolo County's oak woodlands.

Therefore the emphasis placed by the Draft Conservation Element on the Oak Woodland Plan (as an example) functions to mislead citizens and decision-makers toward believing that the County's conservation planning tools are more comprehensive than actual conditions will support. The County needs to fix this by developing and implementing a Conservation Element that actually addresses the conservation of oak woodlands and other important resources.

Oak "woodlands" are, in fact, among the most important habitat types for wildlife and plant species in Yolo County. In 2003 the California Department of Fish and Game (CDFG) published a very useful summary of information about the biological diversity of California that illuminates the relative importance of various parts of the state for biodiversity ("Atlas of the Biodiversity of California;" available from the Department; go to URL: <http://www.dfg.ca.gov/biogeodata/atlas/>). The atlas presents

an abstraction of data compiled by the Jepson Herbarium, the California Native Plant Society, CDFG's Natural Diversity Data Base, and the Wildlife Habitat Relationships database regarding the geographical occurrences of plants and wildlife in Yolo County. Some of the results are abstracted in the following table.

Group	Native Species Richness	
	Blue Ridge and Terraces	Bajada and Basins
Plant Species	1409 - 1705	719-838
Amphibian Species	11 - 17	4 - 6
Reptile Species	19 - 25	6 - 11
Bird Species (Summer)	109 - 127	91 - 108
Bird Species (Winter)	118 - 143	144 - 187
Mammal Species	40 - 47	22 - 39

The center column reflects natural diversity in the mountains and foothills on the western side of the County. The right column reflects natural diversity in the flatter, agriculturally dense lands east of the mountains, including the Yolo Bypass and the wetland basins near the Sacramento River (the Atlas is ambiguous about the inclusion of species associated with riparian corridors along major rivers and streams, including the Sacramento River; presumably these species are included in the diversities identified in the table above). The basic species richness in the western mountains is substantially greater, across taxa, than the species richness in the eastern part of the County. The primary exception occurs with wintering bird species, which include many shorebird and waterfowl species that are associated with wetlands in the basins near the Sacramento River.

For conservation planning purposes it should be noted that greater species richness is generally correlated with a greater richness of "sensitive" plant and wildlife species. Thus a basic conservation planning principle that should be embedded in the General Plan's Conservation Element is a flat statement that *the County shall protect and enhance habitat values in oak woodlands and riparian habitats in the western part of the County*. This essential policy focus is absent from the Draft Conservation Element. Please add it, including the development of operational text (see below) that will demonstrate how the County will accomplish this objective.

The Draft Conservation Element includes several policies that recognize the importance of landscape elements for conservation planning, nominally recognizing the importance of "reserves" and "connectivity" in the landscape. The YAS approves of these policy elements. However, the Draft Conservation Element lacks any sense of what those terms mean or how they would actually be applied to achieve conservation objectives. In fact, conserving relevant habitat values on oak woodlands means adopting a large-scale planning framework that protects habitat values in very large tracts (much larger than the 40 acres identified in Policy CO-2.21) in the western mountains. The Conservation Element could, but does not, identify such a policy focus.

A policy focus that protects habitat values on a landscape scale also addresses the need for conservation planning for "reserves" and "corridors." These are not, in fact, separate planning targets, but are elements in an appropriate landscape-based conservation planning approach. The basic element in a landscape-

scale conservation approach is a "network" of land elements that are managed for conservation purposes. The central features of these conservation networks are generally known as "reserves" (or sometimes as "core areas"), which are often areas with high value in protecting biodiversity. Such areas might demonstrate locally high densities of several sensitive species, or they might be areas with the highest regional densities of a variety of species, such as the mountains in western Yolo County. The core reserve areas are buffered from adverse effects by having additional areas adjacent to the reserves in which land uses may be authorized that have more intense effects on the protected resources; these areas are often identified in conservation plans as "multiple-use areas," or sometimes as "buffer areas." The landscape generally also includes areas that are not protected for biodiversity-maintenance purposes; these areas are often identified as the "matrix" in which the conservation network is embedded.

"Core reserve" selection is an important step in designing landscape-level conservation networks. Noss and Cooperrider (1994; *Saving Nature's Legacy*; Island Press, Covelo, CA) offered the following "empirical generalizations for reserve design:"

- "1. Species well distributed across their native range are less susceptible to extinction than are species confined to small portions of their range.
- "2. Large blocks of habitat containing large populations of a target species are superior to small blocks of habitat containing small populations.
- "3. Blocks of habitat close together are better than blocks far apart.
- "4. Habitat in continuous blocks is better than fragmented habitat.
- "5. Interconnected blocks of habitat are better than isolated blocks, and dispersing individuals travel more easily through habitat resembling that preferred by the species in question.
- "6. Blocks of habitat that are roadless or otherwise inaccessible to humans are better than roaded and accessible habitat blocks."

An important concept in the landscape-level approach is "connectivity," which involves the ability of the landscape to support the movement and interchange of individuals among population segments of species of conservation interest. In many studies this connective function has been related to "matrix permeability," which means that County Conservation Element policies that protect habitat values in "matrix" lands are also important for achieving the Conservation Element's objectives. Natural connections across landscape elements, as well as practices that maintain habitat values in the "matrix," need to be identified and incorporated into the County's regional landscape conservation plan.

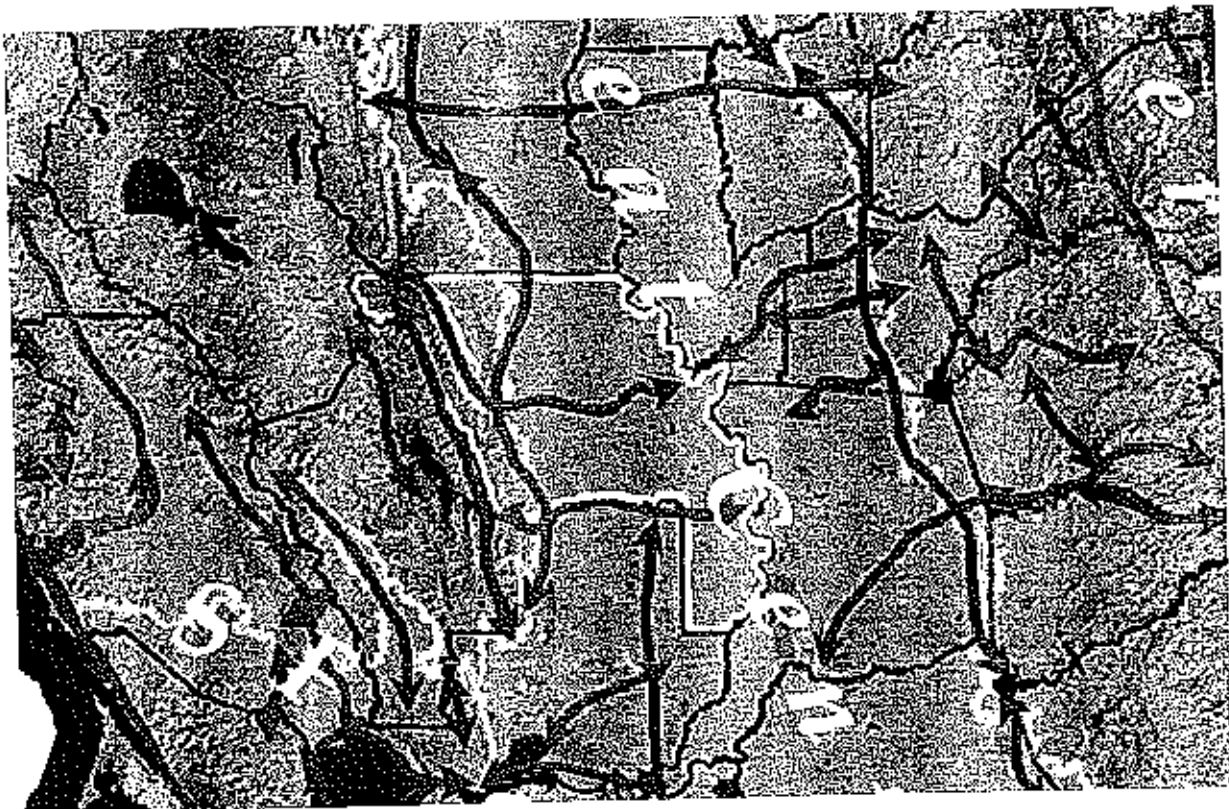
At a conference held in San Diego, CA, in 2000, conservation biologists from around the state identified known or expected biological or conservation linkages in areas in which they worked.¹ An excerpt from the resulting statewide linkages map is shown the following figure. The general opinion among conservation biologists was (and remains) that Putah Creek and Cache Creek are important east-west landscape linkages. A north-south linkage corridor was identified along the Blue Ridge/Rocky Ridge crest. An additional north-south linkage was identified in the lower foothills/terraces, at the margin of the Central Valley flatlands.

The linkages illustrated in the figure serve two broad purposes. First, the linkages were selected, in part, to interconnect relatively large areas of publicly owned land, such as the BLM lands in western Yolo County. The second purpose was to illustrate and support migration routes among important wildland

¹ The resulting publication, with maps that can be downloaded as JPG files, is located at URL: <http://www.calwild.org/resources/pubs/linkages/>.

habitats regardless of ownership. The mountainous regions of western Yolo County were recognized as significant wildland habitats which also served to link similar habitats to the north and south. That is, the broad distribution of natural habitats provided by the landscape in the western mountains serves as both a "habitat" and a "linkage," supporting landscape-level phenomena like the migration of Neotropical birds while also providing habitat for viable sub-populations of resident wildlife species, including wildlife populations in which individuals require large habitat patches. Essentially, the habitat in the western third of the County currently functions as part of a relatively "unfragmented" landscape, and the Conservation Element ought to include a policy focus that maintains that desirable condition.

Putah Creek and Cache Creek are recognized as important connections from the Coast Range to the Sacramento River corridor, and additional linkages were identified between the Sacramento River and the Sierra Nevada foothills. In any landscape-level conservation model for Yolo County these linkages would need serious consideration, together with a designated corridor along the Sacramento River.



Excerpt from the "Statewide Linkages Map," showing Yolo County (yellow boundary) and the landscape-scale linkages (pink arrows) that exist in and near the County. Mapped county linkages include Putah Creek, Cache Creek, the Blue Ridge / Rocky Ridge axis, and a foothill woodland corridor. An additional corridor (not mapped) is the Sacramento River and its riparian corridor.

The "linkages" provided by riparian habitat corridors along major streams are considered by many landscape ecologists to be among the most important elements in landscape-level conservation plans. For example, a major USDA Forest Service study addressing wildlife habitat values in the Blue Mountains of Oregon [Thomas (1979), *Wildlife Habitats in Managed Forests*, USDA Forest Service Agriculture

Handbook No. 553] included the following conclusions: "riparian zones are the most critical wildlife habitats in the Blue Mountains;" "riparian zones are the most critical zones for multiple use planning in the Blue Mountains;" and "riparian habitat alterations will affect wildlife far more than indicated by the proportion of the total area." The Blue Mountains report noted that 285 of the 378 terrestrial wildlife species (75 percent) in the Blue Mountains either depended on riparian zones or used them more than other habitats. Similar results have been reported from numerous other studies of riparian ecosystems.

Riparian ecosystems are sensitive to the hydrological dynamics of the adjacent streams or rivers, because riparian habitat is functionally affected by inadequate streamflow [Winter and others (1998), *USGS Circular 1139*; NRC (2002), *Riparian Areas*, National Academy Press, Washington, DC]. Landscape-level conservation plans typically include considerations about watershed management [such as the Willow Slough Watershed IRMP (JSA 1996; *Final Willow Slough Watershed Integrated Resources Management Plan*)]; in Yolo County such a plan would also need to include water-supply considerations, inasmuch as both Cache Creek and Putah Creek are hydrologically affected by water-supply management requirements. For the Cache Creek linkage corridor, the linkage elements in the conservation plan would also need to address other hydrologically focused questions, such as floodplain management.

The size of the area that is necessary for landscape-level conservation planning is an important consideration for any planning effort, including Yolo County's General Plan. The minimum scale for landscape-level conservation planning is conceptually related to "the smallest area in which all of the processes that affect the landscape recur" with a frequency that maintains the elements. This is functionally the "minimum dynamic area" of Pickett and Thompson (1978; *Biological Conservation* 13:27-37) and Pickett and White (1985; *The Ecology of Natural Disturbance and Patch Dynamics*; Academic Press, New York), which includes disturbance regimes (such as fire) as well as the landscape areas through which matter and energy cycle (such as watersheds). Typically the area that is needed is much larger than the average disturbance patch; an appropriate focus of the landscape-scale conservation plan is to perpetuate the natural disturbance regime [Baker (1992) *Landscape Ecology* 7:181-194], and the minimum dynamic area may be larger than the 40,000± acres that burned in the Rumsey fire in October 2004.

In landscape-level conservation planning, suitable management elements for the core reserves and the multiple-use buffer areas must be identified that accomplish the plan's goals [often some consideration will be given, as well, to general landscape conditions ("matrix" areas) near the buffers]. The following table provides an example of a set of management guidelines [modified from Noss (1993) *Natural Areas Journal* 13:276-290] for a conceptual conservation plan that could, for example, be located in the mountainous region in western Yolo County. Core reserve areas might include public lands in the Berryessa Peak region. Buffer lands could include the surrounding ridges and foothills. The landscape matrix, for this plan, might include the agricultural lands in the bajada region and farther east.

Landscape-Level Conservation Planning Guidelines for Yolo County. ^A

Core Reserves:

No new road construction or reconstruction.

Close all pre-existing roads other than major highways; restore roadbeds to prior conditions. Reduce overall road density under 0.5 miles road / square mile of reserve.

No off-highway vehicles (including bicycles).

<p>No horses (they introduce exotic species). No grazing or agricultural activities. No logging or other commercial extraction of plants or biological materials. No commercial extraction of other natural objects. No mineral or energy leasing. Eliminate exotic species. Limit fire suppression. Recreational activities such as hiking, primitive camping, nature study, environmental education, non-motorized restoration of degraded areas, and non-manipulative research are encouraged. Eliminate inholdings.</p>
<p>Multiple-use Buffer:</p> <p>Limit new road construction to those consistent with protecting core reserve environmental resource values. Reduce or maintain overall road density under 1.0 miles road / square mile of buffer land. No motorized off-high vehicles on public land. Protect environmentally sensitive resources, particularly riparian areas, oak woodlands, and habitats for sensitive species. Vegetation manipulation, including grazing, logging, or other extractive activities, must be consistent with restoration and management goals for protecting core reserve environmental resource values. Restore degraded areas. Eliminate exotic species. Manage fire suppression to be consistent with protecting core reserve environmental resource values. Recreational activities, including hiking, low-impact camping, nature study, environmental education, non-motorized restoration of degraded areas, and non-manipulative research are encouraged. Eliminate inholdings, or establish easement restraints over inholdings.</p>
<p>Matrix Near Buffer:</p> <p>Require sustainable resource management approaches, including those for agricultural and timberland management. Protect environmentally sensitive resources, particularly riparian areas, oak woodlands, and habitats for sensitive species. Restore degraded areas. Eliminate exotic species.</p>

A Modified from Noss (1993).

An appropriately crafted landscape-based conservation planning focus will address, in part, the need for landscape elements that allow the County's biota to respond to habitat changes that result from changing climate. The Draft Conservation Element recognizes this by acknowledging the potential conservation benefits of Tuleyome's proposed Berryessa Snow Mountain National Conservation Area, which the YAS supports. The Draft Conservation Element, however, otherwise ignores these essential landscape-based conservation planning elements. Please develop and incorporate into the Conservation Element a landscape-based conservation planning approach for Yolo County and the surrounding landscape.

C. Operational Policies and Implementation Program Elements

The policies and implementation elements in the Draft Conservation Element generally lack operational standards that will result in the County's protection of the "working native ecosystem." Below are several specific suggestions for operational policies or implementation measures that would significantly strengthen the Draft Conservation Element. It should be noted that these elements were relatively straightforward to develop, and it appears that the policy focus in the Conservation Element could be entirely "operationalized" in this way. Based on these examples, please expand all of the policies and implementation measures in the Draft Conservation Element so that readers of the Element and the CEQA document can see how the achievement of the conservation policies will be measured.

1. Habitat value protection. Environmentally sensitive habitat areas (ESHAs) shall be protected against any significant disruption of their habitat values, and only uses dependent on and compatible with maintaining those resources shall be allowed within ESHAs. Proposed development in areas adjacent to ESHAs shall be sited and designed to prevent impacts which would significantly degrade such areas, and must be compatible with the continuance of such habitat areas.

2. Sensitive habitat definition. The County declares all of the following to be ESHAs within the planning area:

- a. Rivers, creeks, sloughs, and associated riparian habitats, including but not limited to: Sacramento River, including the Yolo Bypass and the Delta; Putah Creek, Enos Creek; Salt Creek/Chickahominy Slough; Dry Slough; Cottonwood Creek/Slough; Cache Creek, Willow Slough; Oat Creek; Bird Creek; Buckeye Creek; and other named and unnamed watercourses in Yolo County.*
- b. Wetlands, natural lakes or ponds, and associated riparian habitats.*
- c. Other unique habitat areas: waterbird rookeries; shorebird concentration sites; habitat for all rare, threatened, or endangered species on federal or state lists.*
- d. Public Trust lands.*

3. Sensitive habitat information required in application review. Where there is a question regarding the boundary, buffer requirements, location, or current status of an ESHA identified pursuant to General Plan policies, the public or private applicant shall provide the County with all of the following:

- a. Base map delineating topographic lines, adjacent roads, and location of levees, flood control channels, and other hydrological controls, as applicable.*
- b. Vegetation map, including identification of species that may indicate the existence or nonexistence of a sensitive environmental habitat area.*
- c. Soils map, including an identification of hydric soils, if present.*
- d. Census of animal species indicating the existence, or nonexistence, of an environmentally sensitive habitat area.*

This information shall be provided to the Department of Fish and Game, US Fish and Wildlife Service, and other affected agencies for review and comment. Any comments and recommendations provided by the agencies shall be immediately sent to the applicant for response. The decision concerning the

boundary, location, or current status of the environmentally sensitive habitat area in question shall be based on the substantial evidence in the record and supported by written findings.

4. Streamside Protection Areas (SPA). *A streamside protection area is hereby established along both sides of the streams in the County. The SPA shall remain in a natural state in order to protect streams ecosystems and associated riparian habitat areas. The SPA shall include:*

- a. In areas including substantial existing development, the SPA shall be not less than 25 feet outward on both sides of the stream, measured from the top of bank.*
- b. In all other locations within the County, the SPA shall be not less than 100 feet outward on both sides of the stream, measured from the top of bank.*
- c. In locations within the County that have existing areas of riparian vegetation exceeding 100 feet in width measured from the top of bank, the SPA shall be expanded to encompass all of the riparian vegetation, except in no case shall the SPA exceed 500 feet in width from the top of bank on either side of the stream.*

5. Wetland/Stream functional capacity maintenance requirement. *Diking, filling, or dredging of a wetland or stream shall maintain or enhance the functional capacity of these resources. Functional capacity means the ability of the wetland or stream to be physically and biologically self-sustaining and to maintain natural species diversity. In order to establish that the functional capacity is being maintained, all of the following must be demonstrated:*

- a. Presently-occurring plant and animal populations in the County's aquatic ecosystems will not be altered in a manner that would impair the long-term stability of the ecosystem (i.e., natural species diversity, abundance, and composition are essentially unchanged).*
- b. A species that is rare, threatened, or endangered will not be significantly adversely affected.*
- c. Consumptive (e.g., fishing) or non-consumptive (e.g., water quality and research opportunity) values of the wetland or stream ecosystem will not be significantly reduced.*

D. Other Conservation Plans: Partners in Flight (PIF), California Partners in Flight (CalPIF), and Related Bird/Habitat Conservation Plans

A number of existing conservation plans have been developed that explicitly address conditions and conservation activities that are appropriate or needed in Yolo County. Please consider all of the following plans, and identify in the Conservation Element and in the CEQA document how the Draft Conservation Element addresses the recommendations in these plans. Please consider explicitly the species and habitat elements identified in these plans that are not covered in either the Draft Conservation Element or the YNHP plan documents.

1. Partners in Flight. "Partners in Flight / Compañeros en Vuelo / Partenaires d'Envol (URL: <http://www.partnersinflight.org/>) was launched in 1990 in response to growing concerns about declines in the populations of many land bird species, and in order to emphasize the conservation of birds not covered by existing conservation initiatives. The initial focus was on Neotropical migrants, species that breed in the Nearctic (North America) and winter in the Neotropics (Central and South America), but the focus has spread to include most landbirds and other species requiring terrestrial habitats. The central

premise of Partners in Flight (PIF) has been that the resources of public and private organizations in North and South America must be combined, coordinated, and increased in order to achieve success in conserving bird populations in this hemisphere." See particularly the **Partners in Flight North American Landbird Conservation Plan** (URL: http://www.partnersinflight.org/cont_plan/default.htm).

2. California Partners in Flight. "The CalPIF mission is to promote the conservation of resident and migratory landbirds and their habitats in California through research, monitoring, education, and collaboration among public and private landowners and managers, government agencies, non-government organizations, and individuals and other bird conservation efforts. The California chapter of Partners in Flight (CalPIF; URL: <http://www.prbo.org/calpif/index.html>) was established in 1992. ...

"Recognizing that the major cause of population declines in California was the loss and degradation of habitat, the first action of CalPIF was to identify habitats important to birds. Following the guidelines of the International Partners in Flight "Flight Plan," habitat-based Bird Conservation Plans (BCPs) have been prepared to facilitate that goal by stimulating a proactive approach to landbird conservation."

Coniferous Forests BCP V 1.0 (URL: <http://www.prbo.org/calpif/pdfs/conifer.v-1.pdf>)

Coastal Scrub & Chaparral BCP V 2.0 (URL: <http://www.prbo.org/calpif/pdfs/scrub.v-2.pdf>)

Grasslands BCP V 1.0 (URL: <http://www.prbo.org/calpif/pdfs/grassland.v-1.pdf>)

Oak Woodlands BCP V 2.0 (URL: <http://www.prbo.org/calpif/pdfs/oak.v-2.0.pdf>)

Riparian BCP V 2.0 (URL: http://www.prbo.org/calpif/pdfs/riparian_v-2.pdf)

The Sierra Nevada Range BCP V 1.0 (URL: <http://www.prbo.org/calpif/pdfs/sierra.v-1.pdf>)

Guide to North American Bird Conservation (URL: <http://www.prbo.org/calpif/pdfs/guide.pdf>)

"These plans are dynamic documents that will follow a continuous process of developing and updating conservation recommendations for California's habitats based on the latest scientific monitoring and research data. Combined with the associated CalPIF study areas database and focal species breeding status database (URL: <http://www.prbo.org/calpif/maps.htm>), these plans provide the foundation for adaptive conservation management in California's habitats."

3. Riparian Habitat Joint Venture. "California Partners in Flight (CalPIF) initiated the Riparian Habitat Joint Venture (RHJV; URL: <http://www.prbo.org/calpif/html/docs/rhJV/>) project in 1994. To date, eighteen federal, state and private organizations have signed the landmark Cooperative Agreement to protect and enhance habitats for native landbirds throughout California. The RHJV, modeled after the successful Joint Venture projects of the North American Waterfowl Management Plan, reinforces other collaborative efforts currently underway which protect biodiversity and enhance natural resources as well as the human element they support."

The **Riparian Bird Conservation Plan** (URL: http://www.prbo.org/calpif/pdfs/riparian_v-2.pdf) is specifically and directly related to this Joint Venture. Also see the following (developed for the RHJV): **Comparison of Methods to Map California Riparian Areas** (San Francisco Estuary Institute 2006; URL: http://www.sfei.org/wetlands/Reports/No522_WL_RHJVReportFINAL.pdf)

4. Central Valley Joint Venture. “The mission of the Central Valley Joint Venture ([URL: http://www.centralvalleyjointventure.org/](http://www.centralvalleyjointventure.org/)) is to work collaboratively through diverse partnerships to protect, restore, and enhance wetlands and associated habitats for waterfowl, shorebirds, waterbirds, and riparian songbirds, in accordance with conservation actions identified in the Joint Venture’s Implementation Plan.

“Through these biologically based actions, the Joint Venture will advance its vision of providing diverse habitats necessary to sustain migratory bird populations in perpetuity for the benefit of those species, resident wildlife, and the public. See the following:

CVJV-related Conservation Plans or Management Plans ([URL: http://www.centralvalleyjointventure.org/plans/](http://www.centralvalleyjointventure.org/plans/))

North American Waterfowl Management Plan ([URL: http://www.fws.gov/birdhabitat/NAWMP/index.shtml](http://www.fws.gov/birdhabitat/NAWMP/index.shtml))

U.S. Shorebird Conservation Plan ([URL: http://www.fws.gov/shorebirdplan/USShorebird/PlanDocuments.htm](http://www.fws.gov/shorebirdplan/USShorebird/PlanDocuments.htm))

Southern Pacific Shorebird Conservation Plan ([URL: http://www.prbo.org/cms/docs/wetlands/SPSCPlan_010904.pdf](http://www.prbo.org/cms/docs/wetlands/SPSCPlan_010904.pdf))

The **Riparian Bird Conservation Plan** ([URL: http://www.prbo.org/calpif/pdfs/riparian_v-2.pdf](http://www.prbo.org/calpif/pdfs/riparian_v-2.pdf)) is also a related management plan for the CVJV.

In terms of bird conservation, the Partners in Flight (PIF) program is unquestionably the most important program in North America. The PIF agenda is framed on the general premise that migratory birds (which are formally protected by the Migratory Bird Treaty Act, a federal law that originally dates back to 1918, and which forms the basis for essentially all of the plans on the websites cited above) require concerted attention from government agencies and private organizations to assure that their habitat needs are identified and considered. This focus results in large part from the fact that while the birds are protected by the Act, the habitats that the birds require are often not protected (although habitats such as many wetlands and habitats that occur on federal or other public lands may be protected by other federal or state laws). As a consequence of habitat loss the viability of populations or species can be affected. Thus the PIF goal is to identify species that could be affected by habitat loss or other kinds of “indirect” impacts throughout the United States, Canada, and (more recently) Mexico

As part of the PIF’s work, a number of plans have been drafted that address the conservation status of most of the bird species in the United States as well as in various regions. In California the conservation work of the PIF is mostly carried out by the California Partners in Flight (CalPIF) group, which is logistically based at the Point Reyes Bird Observatory but which includes many of the state and federal agencies and private organizations focused on birds in California.

The CalPIF conservation planning work supplements and supports the work of the PIF. The recommendations of the PIF are included in the Landbird Conservation Plan. California is a biologically diverse state and requires consideration of many habitat types in the landbird plan; the region that includes Yolo County is the “Pacific Avifaunal Biome.” The CalPIF plans referenced above are local considerations of the content of the landbird plan, extending the recommendations based on the enhanced knowledge base in this region.

The focus of the PIF plans is not just on species that are “endangered” or otherwise somehow considered under a federal or state legal umbrella. The basic thrust of the PIF planning effort is to consider the current status of each species (including the protected status owing to current rarity), but also to consider the biological and ecological dynamics of the species to identify potential future conservation concerns. Thus Yellow-billed Magpies become a conservation priority in our region, as do species that we might generally consider conservationally “safe,” such as Oak Titmouse, because the habitats used by these species are under threat from development or other kinds of alteration or loss. In other words, the recommendations in the PIF and CalPIF plans are effectively conservation judgements about potential threats to the entire avifauna in California because of possible habitat losses, as well as a consideration of the “rarity” that is reflected on more formal listings.

The information in the PIF and CalPIF plans cited above represents a conservation judgement about the status of birds in the region that is based on conservation science as it’s known to the participants. It should be noted that the National Audubon Society (NAS) is an active PIF participant, and the NAS’s published judgements about the conservation status of bird species and their habitat needs (see URL: <http://audubon2.org/watchlist/viewWatchlist.jsp>) are virtually the same as those in the various PIF plans.

The YAS Board requests that the County identify the policies and implementation elements in the Conservation Element (and in other portions of the General Plan) that address these conservation plans of national and statewide focus. The YAS Board finds that it is entirely reasonable to expect that the County will incorporate national and statewide conservation planning goals into the Conservation Element of the County’s General Plan; if this is not so the Board would like a clear explanation in the Conservation Element as to why the County chooses to be inconsistent with national and statewide conservation programs.

The YAS Board, in considering the needs for bird conservation in Yolo County, has identified a “Yolo County WatchList” of species that are believed on the basis of local knowledge to warrant conservation concern in the County, as noted in the following table.

YAS Status	Primary Habitat	Common Name	Taxonomic Name
Yellow	Wetland	Least Bittern	<i>Ixobrychus exilis</i>
Yellow	Grassland/Prairie	White-tailed Kite	<i>Elanus leucurus</i>
	Field Crops/Riparian	Swainson’s Hawk	<i>Buteo swainsoni</i>
Yellow	Chaparral/Scrubland	Mountain Quail	<i>Oreortyx pictus</i>
	Winter Agriculture	Mountain Plover	<i>Charadrius montanus</i>
Yellow	Stream	Spotted Sandpiper	<i>Actitis macularia</i>
	Wet Pastures/Fields	Long-billed Curlew	<i>Numenius americanus</i>
Yellow	Riparian	Yellow-billed Cuckoo	<i>Coccyzus americanus</i>
	Grassland/Prairie	Short-eared Owl	<i>Asio flammeus</i>
	Grassland/Prairie	Burrowing Owl	<i>Athene cunicularia</i>
Yellow	Oak Woodland	Northern Pygmy-Owl	<i>Glaucidium gnoma</i>

YAS Status	Primary Habitat	Common Name	Taxonomic Name
Yellow	Oak Woodland	Acorn Woodpecker	<i>Melanerpes formicivorus</i>
Yellow	Riparian	Downy Woodpecker	<i>Picoides pubescens</i>
Yellow	Riparian	Willow Flycatcher	<i>Empidonax traillii</i>
Yellow	Oak Woodland	Western Wood-Pewee	<i>Contopus sordidulus</i>
Yellow	Grassland/Prairie	Loggerhead Shrike	<i>Lanius ludovicianus</i>
Yellow	Riparian	Bell's Vireo	<i>Vireo bellii(pusillus)</i>
Yellow	Oak Woodland	Hutton's Vireo	<i>Vireo huttoni</i>
	Field-edge Woodland	Yellow-billed Magpie	<i>Pica nuttalli</i>
	Grassland/Prairie	Horned Lark	<i>Eremophila alpestris (rubea)</i>
	Vertical Riverbanks	Bank Swallow	<i>Riparia riparia</i>
	Oak Woodland	Oak Titmouse	<i>Baeolophus inornatus</i>
Yellow	Oak Woodland	White-breasted Nuthatch	<i>Sitta carolinensis</i>
Yellow	Chaparral/Scrubland	Wrenit	<i>Chamaea fasciata</i>
Yellow	Oak Woodland	Western Bluebird	<i>Sialia mexicana</i>
Yellow	Chaparral/Scrubland	California Thrasher	<i>Toxostoma redivivum</i>
Yellow	Riparian	Yellow Warbler	<i>Dendroica petechia</i>
Yellow	Riparian	Yellow-breasted Chat	<i>Icteria virens</i>
Yellow	Chaparral/Scrubland	Sage Sparrow	<i>Amphispiza belli</i>
Yellow	Grassland/Prairie	Grasshopper Sparrow	<i>Ammodramus savannarum</i>
	Wetland	Tricolored Blackbird	<i>Agelaius tricolor</i>

The species identified in the Yolo County WatchList are included in one or more of the PIF and/or National Audubon Society lists of bird species of conservation concern. As on other "watchlists," "red" species are considered to warrant extraordinary conservation action. In some cases this status results from declining or reduced population size or demographic uncertainty, but in other cases this status results from known losses of the habitat needed by a species. "Yellow" species are generally somewhat less sensitive to stressors than are "red" species, and are considered by the YAS Board to indicate species that are particularly sensitive to prior or ongoing loss of their habitats in the Yolo County region.

The YAS Board and our members plan to monitor the species in the table in order to gauge the status and trends in bird populations in the identified habitats in Yolo County. The Yolo County WatchList also includes a number of species that the YAS Board has identified as having a high priority for habitat enhancement or restoration. In particular, the YAS Board has concluded that restoration and/or enhancement of riparian and wetland areas should occur throughout Yolo County, wherever reasonable opportunities for restoration and/or enhancement occur.

As an example, the Least Bell's Vireo (*Vireo bellii pusillus*) was identified as a common breeding species throughout much of the Central Valley in the first half of the 20th Century. This species, which is closely linked to scrubby riparian habitats, declined and disappeared from the Central Valley by the mid-20th

David Morrison

YAS Comments Concerning the Conservation Element of the Yolo County 2030 General Plan Update

20 November 2008

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Century, resulting in its designation as an Endangered Species under the federal Endangered Species Act. Owing to riparian habitat restorations in National Wildlife Refuge lands in Merced County this species has now been recorded as a nesting species in the Central Valley for each of the past three years. The YAS Board has concluded that similar results can be obtained through restoring riparian scrub habitats in Yolo County and the nearby region, and that this species can be "recovered" and "delisted" in the Central Valley and in California as a whole.

The YAS Board requests that the County identify in the Conservation Element what planning and land use policies the County will adopt that will assist in the maintenance of bird populations and habitats in Yolo County, so that the County's landscape may effectively contribute to the conservation of these habitats and species throughout the region.

Closing

The YAS strongly supports the development and adoption by the County of a Conservation Element that will protect existing conservation opportunities in the County as well as result in future enhancement and restoration of conservation elements in the County's landscape. The Draft Conservation Element has some positive elements that will help in achieving these goals, but it also has a number of conservation shortcomings. The specific elements in this letter can help the County in addressing the shortcomings as we move forward collectively in developing an adequate General Plan framework that addresses all of the County's needs.

Our Board and our members look forward to collaboratively working with County staff and consultants to identify and approve conservation policies that will help to establish Yolo County as an active champion of conservation in the Central Valley and the state as a whole. Thank you for your support of the substantial conservation values that we have in the County.

Sincerely,



Chad Roberts, Conservation Chair
Yolo Audubon Society

cc: Helen Thomson, Supervisor
Maria Wong, Yolo Natural Heritage Program
Graham Chisholm, Audubon-California

Yolo Audubon Society
P.O. Box 886 Davis, CA 95617



03 February 2007

Ms. Mariko Yamada, Chair
Yolo County Board of Supervisors
625 Court Street, Room 204
Woodland, CA 95695

Conservation Concerns for the General Plan Update; 06 Feb 07 BOS Agenda, Item 8.01

Dear Supervisor Yamada and Board Members:

The Yolo Audubon Society (YAS) congratulates the County on its substantial progress in nearing a General Plan Update milestone, the adoption of a preferred land use alternative for the Environmental Impact Report (EIR) preparation process. We live in a time of fairly significant changes in the kinds of concerns that are important to the County's residents, and the YAS is pleased that the Update identifies the importance of conservation issues in the Update. This recognition is embodied in the Planning Commission's recommendation under "Natural Resources" (Staff Report page 20) to "(i)ntegrate the HCP/NCCP into the General Plan." The YAS concurs fully with this need, and stands ready to assist the County's decision-makers, staff, and consultants in accomplishing this difficult task.

The General Plan Update presently before the Board of Supervisors is, however, missing a significant element. The Update has no conservation policy guidance other than to "integrate" the HCP/NCCP. Let me emphasize that: other than the directive to "integrate" the NCCP, the General Plan Update under consideration by the Board of Supervisors on February 6th lacks even one conservation-focused policy. The omission of an adequate conservation policy framework from the Update means that the Update cannot provide any current or future guidance to the County's decision-makers or staff, or to residents in the County, or to applicants for County approvals, about how the conservation of the County's biological diversity is to be achieved, or how it can be integrated into County land use decisions generally.

In my opinion the lack of adequate General Plan conservation guidance affects many current programs in the County in addition to the Update itself. The County has recently adopted an Oak Woodlands Management Plan, which County staff will acknowledge (and have said to me personally) lacks any real connection to a County-wide conservation framework. The County has recently adopted a Parks Master Plan that addresses the parklands' potential for contributing to County-wide biological conservation goals, but the Master Plan does not identify any such goals, and the absence of a conservation element from the General Plan means that the Parks Master Plan cannot achieve that purpose through the management of County-owned land. The County and other local government agencies are currently working on an Integrated Regional Water Management Plan (IRWMP), which may or may not ultimately incorporate a County-wide or regional focus on achieving conservation purposes, but clearly the IRWMP cannot relate its contents to a County General Plan conservation framework when none exists. The full integration of the Cache Creek Resources Management Plan into the region's protection and promotion of biological diversity cannot be achieved without an adequate General Plan conservation framework. The University of California cannot relate its management policies for University-owned lands to a General Plan policy focus that does not exist. Management of the Yolo Bypass, or of Putah Creek, or of other areas where there is a legitimate public-interest land ownership, cannot be correlated with a General Plan conservation policy focus that does not exist.

The absence of an adequate conservation framework from the General Plan is not a small oversight, one that can easily be ignored because it doesn't affect anything important. The absence of a conservation framework from the County General Plan is a significant problem in identifying and achieving a comprehensive management of land use in Yolo County.

In my judgement the attempted reliance on the HCP/NCCP to identify County-wide conservation goals and an implementation program to achieve them is inappropriate and is likely to fail. The Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) will be, indeed, a significant planning achievement for Yolo County when it is adopted, likely providing a framework for conservation planning in the region (i.e., beyond the County's boundaries). However, fully integrating the NCCP into the County's land use framework is likely to be more difficult to achieve than the staff report suggests, requiring far more than a generalized policy commitment. The achievement of the NCCP's aims will almost certainly require some fairly significant controls over uses allowed on lands having significant conservation values. That is, modern conservation is an "active" land use, and is not just passive "open space" protection; the General Plan will have to reflect this understanding in order to "integrate" the NCCP. In my opinion it's highly optimistic to presume that the NCCP will be easily implemented.

In addition, and perhaps of more significance, the HCP/NCCP is not *intended* to address the same range of subjects that a General Plan conservation element is intended to address. The HCP/NCCP is focused on identifying a management approach for a small collection of "sensitive" wildlife species that are currently identified by state and federal agencies under existing laws, in order to create a program that will allow those agencies to issue permits. A General Plan conservation element requires a much broader focus, because it is intended to tell the County's government and all citizens in the County what the County's policies are with respect to all conservationally important "environmental resources," and to identify how the County wants the government and the County's residents to manage the resources.

There is nothing even remotely like this in the current General Plan Update.

In the absence of conservation policy framework in the Update, the County will have to continue to rely on the conservation policy framework in the existing General Plan. The County's adopted General Plan conservation framework (the 1983 General Plan) is not a useful policy statement. It reflects an understanding of the relationships among conservation and land use that is at least 25 years out-of-date. What has been learned about conservation in those 25 years really represents a fundamental change in worldview. The existing (1983) General Plan conservation framework is simply out of phase with current conservation reality.

In considering the existing 1983 General Plan Goals one would find that the Goals include only two that address the most pressing current conservation concerns, a directive to "Establish natural and wildlife areas" (Goal 10) and another to "Conserve Natural Resources" (Goal 29). Given the land use context prevalent in the early 1980s, it isn't particularly surprising to find that the other 39 goal statements are focused on protecting the "productive functions" of soil, water, air quality, open space, and other "resources," and that the inherent focus of these goals is the "wise use" of the County's resources. It also goes without explication that these concerns were relatively better understood then than was the need for biological diversity conservation. On the other hand, the two 1983 goals with an element of relevant focus for today (and even the other 39 goals) contribute very little to a discussion in 2007 about how the County can conserve biodiversity and other environmental resources.

A further review of the 1983 Conservation Element would demonstrate some 41 conservation policies, and again one can find numerous policies addressing soils, water, livestock, minerals, and similar "resources." In reviewing the policies, I could, however, find only four (including portions of CONS, part

Ms. Mariko Yamada, Chair
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of CON 14, part of CON 30, and part of CON 35) that suggest an informed concern or focus on the biological diversity that occurs in the County and the bioregion. Policy CON 30 is the most useful, for it directs the County to "safeguard existing and encourage development and protection of additional wildlife habitat," which is inherently a necessary action for biodiversity management.

The existing 41 conservation policies in the County's General Plan do not address the integration of conservation, as it is understood today, into the management of land use in Yolo County. That is, the County's existing (1983) General Plan policy framework for conservation simply does not provide real policy direction of the kind that's needed if the purpose is actually to protect biodiversity and integrate the conservation of biodiversity into the County's governmental operations.

There is, therefore, a problem with the current General Plan Update that is not being, and will not be, addressed with the direction indicated in the staff report. The General Plan Update requires an explicit incorporation of a focus on conservation. An incorporation of the content of the NCCP would certainly be a desirable outcome, but the General Plan cannot just rely on the future adoption of the NCCP to comply with state General Plan law requirements for the contents of Conservation Elements (the NCCP might not, in any event, ever be adopted).

The YAS calls on the Board of Supervisors to instruct County staff and the County's consultants to develop a discussion and a set of conservation policies that indicate how, as part of the Plan Update, a conservation focus will be incorporated into the General Plan, a focus that incorporates an understanding of conservation biology as it is understood and practiced today.

If it appears (which now seems likely to be the case) that such a focus cannot be effectively incorporated into the current General Plan Update process, then the YAS calls on the Board of Supervisors to direct County staff to inform County citizens and the representatives of other governments with an interest in conservation that the County will prepare a separate General Plan Conservation Element, within five years, that fully integrates existing law and existing County planning elements into an effective Conservation Element for the Yolo County General Plan.

In framing conservation policies for the General Plan, the YAS further calls on the County to adopt an ecosystem-based management (EBM) framework for the Plan. EBM is a rational focus for conservation planning on a landscape scale. I have written several recent YAS newsletter columns about EBM and how it could be related to conservation planning in the County; several of these are included in the attached document.

Notwithstanding the concerns identified above, the YAS Board, and citizens in Yolo County generally, appreciate the dedication with which the County's decision-makers, staff, and consultants are proceeding with the Update. We are fortunate to have a Board of Supervisors that cares about land use in the County. Thank you very much.

Sincerely,

Chad Roberts,
Conservation Chair

Attachment: Burrowing Owl columns regarding EBM and County Planning

Yolo Audubon Society Conservation Corner

*By Chad Roberts
Conservation Chair*

December 2006

Land Use Planning and Environmental Resource Protection in Yolo County

As many YAS members know, Yolo County is engaged in the process of revising and updating the County's General Plan. General plans provide the primary direction for all land use decisions in counties and cities, and they must be updated periodically under state law, particularly when the value systems in the county or the city change significantly. The historically dominant theme in Yolo County's General Plan has been, essentially, to assure that development, open space protection, aggregate mining, and any number of other land uses don't significantly affect agricultural lands or practices in the county, or alter the importance of agriculture in the minds of decision-makers in the county.

The vast majority of Yolo County's nearly 200,000 current residents, however, no longer live on farms or gain their primary income from agriculture. The values of the county's residents about the natural environment are not well characterized, but I suspect that many residents feel that the county's natural environment deserves careful consideration and as much protection as the general plan can provide. These county residents probably would be profoundly disappointed in the current direction that the General Plan Update process has taken.

In September the county's senior planning staff and the primary consultant for the General Plan Update requested (and received) direction from the Board of Supervisors that focused primarily on developing an update that considers development within the county in ways that minimize adverse effects on agriculture (URL: <http://www.YoloCounty.org/org/bos/agendas/2006/091906/801.pdf>). The request didn't ask for Board of Supervisors direction with respect to planning for and integrating protection for environmental resources

(oak woodlands, riparian areas, fish, tiger salamanders, migratory birds, or similar conservationally important elements) into the General Plan Update.

The YAS Board of Directors sent comments to the Board of Supervisors in September, asking that a policy focus protecting the county's environmental resources be added to the General Plan Update process. That brief comment pointed out the need for a planning focus for those environmental concerns that had the kind of high priority that blending development and agriculture are already receiving. The Board of Supervisors needs to hear from other county residents that this is, indeed, a priority for the update.

Addressing the needs of the natural environment is not a process that can be teased out of land use considerations that are focused on minimizing conflicts between development and agriculture. Planning for environmental conservation requires the application of a different set of planning principles and approaches. Such principles are embodied in the planning process currently underway for the Natural Communities Conservation Plan (NCCP) development program, and some relevant conservation considerations were already adopted by the county in the Parks Master Plan. However, neither of these planning processes is currently (based on the direction provided by the Board of Supervisors) an element that will be considered in any significant way by the county's planning staff or the general plan consultant.

In coming months, I will present brief summaries in this column of some of the conservation planning considerations that should be incorporated into the update process. However, please act at once to tell the Board of Supervisors

not to delay incorporating these elements into the plan update. Write to the Board and tell them that you want the county's general plan to protect oak woodlands, riparian areas, wetlands, vernal pools, native prairies, and other important habitat areas, as well as protecting the species that use these

habitats. Tell the Board that, in making decisions about land uses in the county, protecting these environmental resources is at least as important to you as are protecting agricultural lands or reserving areas that will be committed to development.

January 2007

Ecosystem-Based Management for Yolo County (I)

If Yolo County were located on the coast, discussions about conservation or "resource" management would begin with the premise that all land use decisions in the coastal zone (as well as other actions subject to local discretion) would derive from a concept called *ecosystem-based management* (EBM). This premise is based on the near-universal adoption of EBM in the context of ocean-related plans:

"The goal of EBM is to maintain the health of the whole as well as the parts. It acknowledges the connections among things." — *Pew Oceans Report, 2003*

"EBM looks at all the links among living and nonliving resources, rather than considering single issues in isolation . . . Instead of developing a management plan for one issue . . ., EBM focuses on the multiple activities occurring within specific areas that are defined by ecosystem, rather than political, boundaries." — *US Ocean Commission Report, 2004*

These statements are quoted from a National Center for Ecological Analysis and Synthesis (NCEAS) EBM webpage (URL: <http://ebm.nceas.ucsb.edu/faq/definition/>), which also includes the eight well-known "principles of ecosystem management" identified in a 1996 publication that's generally recognized as the key conceptual paper for all EBM approaches today. However, I find the following quotation from the website of the Minnesota Department of Natural Resources (URL: http://www.dnr.state.mn.us/ecological_services/ebm/index.html) to be a more easily understood statement of what EBM really means when it's applied to land use planning and other environmental resource management issues:

"Ecosystem-based management relies on the following key principles:

"Partnerships and citizen participation. Work together with citizens, landowners, businesses, local governments, interest organizations, and other agencies to face problems, identify opportunities and find common solutions.

"Science-based approach. Use the best available scientific knowledge (social, economic, and ecological) as a foundation for decision-making; understand natural resource interrelationships, and focus on sustainability of whole ecological systems.

"Long-term view. Establish long-term goals for desired ecosystem conditions that maintain the capacity of the land to sustain public benefits and opportunities into the future.

"Comprehensive perspective. Find solutions that support economic prosperity, lasting livelihoods, and ecological health."

Yolo County is currently updating its general plan, including the land use element and the conservation element. The county is also developing (in conjunction with other governments in the county through a joint powers agency) a Natural Communities Conservation Plan (NCCP), as well as an "oak woodland plan" that will affect rural landscape management in parts of the county. It seems that it would be appropriate for the county to adopt an overall land use plan approach that incorporates the "key EBM principles;" the NCCP process already does, in fact, embrace an approach that incorporates these principles.

In a larger sense, it seems obvious that a general plan, NCCP, or other planning approach that did *not* incorporate the identified "key EBM principles" should be considered deficient in addressing the long-term maintenance of important conservation resources in the county, such as riparian habitats, oak woodlands, and native prairie ecosystems. The Yolo Audubon Society already advocates that the county frame its planning

around the EBM principles, and will continue to do so. In order to explain more fully to our members and to other interested parties in the county what

this involves, I will in coming months illustrate with some focused examples the application of EBM within Yolo County.

February 2007

Ecosystem-Based Management for Yolo County (II): Oak Woodlands

In last month's column I identified several elements that most conservation scientists consider to be minimum requisites for "ecosystem-based management" (EBM). These include (and these are primary requirements from the perspective of conservation biology) "adopt a science-based approach" and "adopt a long-term view for achieving desired ecosystem conditions." In the December 2006 column I wrote that the County's General Plan update has not incorporated a policy framework recognizing the County's environment as a separate focus for the General Plan that differs from urban uses, farming, and other non-conservation uses. An obvious implication is that the General Plan update should incorporate an EBM perspective into sections that are focused on protecting conservationally significant elements in the County, but how that should be accomplished is less clear.

Consider the County's recently issued Yolo County Draft Oak Woodland Conservation and Enhancement Plan (see URL: <http://www.yolocounty.org/prm/events.htm> and click the link for the Plan). This document was created by County staff to address the requirements of the Oak Woodlands Conservation Act, a state law that requires such a Plan before local governments are eligible for state funding earmarked to carry out the purposes of that law. Because this is a current County planning approach, it would be reasonable to expect that the Plan would incorporate an EBM approach to oak woodland management in Yolo County. In fact, the Draft Plan completely lacks any element of an approach based on conserving oak woodland ecosystems.

The County's Draft Oak Woodlands Conservation Plan does identify the importance of oak woodlands for conservation purposes (and for other things, including the amenity values that oak woodlands provide for homeowners). The Draft Plan does not, however, identify conservation values for any actual oak woodland areas in Yolo County. The Plan doesn't include any

consideration of how the oak woodlands in the County function within the landscape to provide habitat or ecosystem functions that arise from oak woodland habitats. The Draft Plan most definitely doesn't incorporate "a long-term view for achieving desired ecosystem conditions." Quite clearly this current County Plan fails to achieve a basis in "ecosystem-based management."

What would the Draft Oak Woodland Conservation Plan need in order to be an EBM Plan? In a very general sense, it would need an identification of the existing habitat structure and habitat usefulness provided by oak woodlands in Yolo County; that is, the Plan would have to identify the existing, real conservation values of actual oak woodlands. It would need an indication of how these oak woodlands should be looked at (i.e., managed) on a County-wide basis in order to provide for the conservation of our oak-dominated landscapes. Then the Plan would need a management approach that identified suitable management practices that would be implemented within different parts of the County's landscape in order to achieve the EBM conservation goals.

There is some reason to hope that the Yolo County Natural Community Conservation Plan (NCCP), which is still in development, will include a landscape-based conservation framework within which oak woodlands will be one of the primary elements, because of their acknowledged importance for natural ecosystem processes in the County. Both the Draft Oak Woodland Conservation Plan and the County's General Plan update nominally identify a need for compatibility with the requirements of the NCCP.

The problem that exists with the stated "compatibility" requirements is that without a framework in ALL of the County's planning documents that recognizes and protects the essential elements of ecosystems in the County there can be no effective ecosystem-based management approach in the County. As I noted in the December column, however, the Yolo County General Plan update process lacks any sort of

framework that establishes the conservation of ecological resources as an independent goal for the Plan.

It is really quite important that Yolo Audubon Society members and other conservationists in Yolo County call or write to the County's responsible planning staff, and even more important that they call or write to the members of

the Board of Supervisors, expressing the opinion that the County's General Plan must have a separate focus on conserving the important ecological elements in the County, and expressing the view that the General Plan must adopt a focus for our landscape that includes ecosystem-based management.



YOLO COUNTY FARM BUREAU

69 West Kentucky Avenue • P.O. Box 1556, Woodland, California 95776
530-662-6316 • FAX 530-662-8611 • www.yolofarmbureau.org

70.
PRESIDENT
Tim Miramontes
1ST VICE-PRESIDENT
Chuck Dudley
2ND VICE-PRESIDENT

SECRETARY/TREASURER
Denise Sagara

November 20, 2008

RECEIVED
Yolo County

NOV 20 2008

Planning and
Public Works

TO: Yolo County Planning Dept.

FROM: Tim Miramontes, President

RE: Comments Regarding Draft General Plan Update

Yolo County Farm Bureau directors have reviewed the draft General Plan Update and have the following comments and concerns regarding:

Agriculture & Economic Development Element

Policy iii Industrial uses – correction - wineries are also located in Davis and Winters

Ag Districts **OPPOSE** Clarksburg residents want the Special District designation. Capay Valley and Dunnigan Hills Residents vehemently oppose it. We believe agriculture would be better served if the benefits of the Special District is applied throughout the county.

AG-1.6 **SUPPORT** Our historic policy has always been to push for greater than 1:1 conversion. At this rate ½ of the county will be converted. We continue to oppose stacking of easements; i.e. habitat and ag mitigation.

AG 1.7 **OPPOSE** In 2005 this came up and Farm Bureau mailed a survey to voting members. Of the responses, the majority overwhelming said they did not want to be told there to place their homesites, and especially not to have a requirement to cluster homes with their neighbors. Farm Bureau remains opposed to this idea. Perhaps this can be accomplished with incentives, instead of punishment. For landowners who do these things, maybe they could get a serious break on construction fees. County should not push the notion that you have to get an easement, although maybe there can be similar rewards, like an expedited permitting process, or property tax breaks if the landowner chooses an easement

AG 1.9 **UNDECIDED** We need more information about this before taking a position on this policy.

AG 1.14 **CONDITIONAL SUPPORT** If the words "voluntary and at the property owner's discretion" were added to the policy we might support this. This is too complicated – the County should offer incentives to dissolve subdivisions – like expediting permitting, etc.

AG 1.21 **OPPOSE** The County should not be involved in this. This is for landowners and growers to work on, if they choose.

AG 1.22 **OPPOSE** This policy removed landowner/grower choices. Surface water sales could be ok depending on the circumstances. Perhaps a one year term could be made on sales. The option needs to be available. Many easements require similar language be inserted into documents. What is the purpose of protecting land if you don't also protect the water?

- AG 2.4 **OPPOSE** We support growers choosing the implementing Best Management Practices that work for their operation, but oppose anyone or any agency proposing or deciding what Best Management Practices to use. This not something the county really has any business trying to regulate, unless they want to provide financial incentives – that is what NRCS is for.
- AG 2.9 **OPPOSE** Wildlife can create water quality and food safety problems, as was recently the case in Salinas, with the E.Coli/ spinach issue. Growers need the flexibility to decide what is best for the crops they grower. The county should promote "voluntary" practices that don't create a nuisance for neighbors.
- AG 2.12 **OPPOSE** Agriculture and flood control should be the priorities in the Yolo Bypass. Agriculture and recreation often have incompatible objectives.
- AG 2.13 **OPPOSE** Growers are currently using the best agricultural methods to reduce pesticides, herbicides and fertilizers. Growers already comply with Cal EPA laws. This isn't the county's place to regulate (except for the Ag Commissioner).
- AG 2.14 **OPPOSE** Same as answer as above, except applies to soil and water uses. It isn't the county's place to regulate.
- AG 2.15 **OPPOSE** See answer to AG 2.9. There are food and water quality safety issues. The County should not be involved in growers business decisions. Same answer above applies.
- AG 2.16 **SUPPORT** We support getting carbon credits with the Yolo-Solano Air Quality Management District?
- AG 3.1 **OPPOSE** See response to "Ag Districts" above – some areas do not want to be designated an Ag District
- AG 3.4 **SUPPORT** We suggest that you add "streamline the permit requirements and reduce fees". Implementation will likely be difficult.
- AG 3.5 & 3.6 **SUPPORT** However, Federal regulations will make this action prohibitive for migrant workers.
- AG 3.10 **SUPPORT** This policy must not preclude these same things from being placed on larger parcels.
- AG 3.15 **UNDECIDED** Growers are already working with these agencies. This doesn't need to be included in the General Plan. The County can't dictate who growers work with.
- AG 4.4 **UNDECIDED** This doesn't need to be included in the General Plan.
- AG 4. **SUPPORT** This should apply to all crops grown in Yolo County.

- AG-A6 **OPPOSE** The only part of this section that is acceptable is the last item "...recording of a deed notice acknowledging the County's right-to-farm ordinance; private property rights." This is overly aggressive, and while some of these concepts would solve problems, they trample on property rights. The county can promote these concepts (see AG 1.7) in other ways. A stewardship plan is going a bit too far.
- AG-A9 **OPPOSE** We would support if the words "voluntary, not mandatory" are included.
- AG-A11 **OPPOSE** We oppose any plan for privately owned lands
- AG-A12 **UNDECIDED** This should be a private enterprise issue. There is also a need for a USDA approved animal harvest facility in Yolo County.
- AG-A14 **SUPPORT** We support reduced fees, permits. The County needs agricultural facilities.
- AG-A16 **UNDECIDED** We support the idea, and it would be good for local farmworkers who live here year-around. Federal regulations would be prohibitive for migrant worker housing.
- AG-A18 **SUPPORT** We support, suggesting that you add "working with Farm Bureau and the NRCS".
- AG-A19 **OPPOSE & SUPPORT** We oppose the creation of another governmental agency. However, if it is created, funds need to be identified so the cost isn't absorbed by the Ag Dept. Hiring Georgeanna Brennan and Anna Evans worked very well. We support agricultural marketing.
- AG-A20 **OPPOSE** We don't believe there needs to be a permanent position. Once the coordinator position and process has been set up, it's unlikely a permanent person would be needed.
- AG-A21 **OPPOSE** We oppose, unless the County makes certain this policy is clearly intended for non-ag, and will not impact agriculture. This policy could have unintended consequences for agriculture. It is not the County's role – there is already oversight by DFG. How is a natural system defined?
- AG-A22 **OPPOSE** See responses to Ag Districts above
- AG-A23 **OPPOSE** We adamantly oppose. This would create a double tax. We already have concerns about imposed fees without representation in the ag areas such as the recently mandated waste collections services that no one was aware of until it was passed).
- AG-A25 **OPPOSE** We adamantly oppose. Private property rights would be compromised. County can offer incentives to allow those who wish to do this voluntarily.
- AG-A27 **OPPOSE** The County would need to make sure this ALWAYS stays voluntary and doesn't become an excuse to put multiple houses on properties.
- ED 1.3 **SUPPORT**
- ED 1.4 **SUPPORT**

- ED 1.5 **SUPPORT**
- ED 1.13 **SUPPORT**
- ED 2.2 **SUPPORT**
- ED 2.4 **UNDECIDED** We have concerns about "trails" and "water supply". No trails on private property. Would need more information to support.
- ED 3.2 **SUPPORT**
- ED 4.2 **SUPPORT**
ED 4.4 **OPPOSE** We would only support if this clearly stated "on public property only" or "not on private property".
- ED 4.8 **OPPOSE** – see the reasons stated above
- ED 5.10 **SUPPORT** We support if it does not apply to irrigation of agricultural commodities
- ED-A2 **SUPPORT**

OPPOSE The NCA has not been formed, only proposed. It should not be included in the General Plan

CONSERVATION & OPEN SPACE ELEMENT

- CO-8 **OPPOSE** This has no place in the general plan. This represents a private effort by a local environmental organization.
- Proposed Blue Ridge Trail **OPPOSE** We are very concerned that these maps continue to appear on county parks documents, despite repeated protests from affected landowners, and the county's agreement that the maps would be removed
- Goal CO-1 **OPPOSE** We oppose this, unless it expressly states it will not go through private lands
- CO 1.1 **OPPOSE** What exactly is this supposed to look like? This policy states many feel-good terms, but the details may present serious challenges. It is too vague.
- CO 1.2 **OPPOSE** We would support only if this is planned to go through public lands, not privately owned lands. It is critical that all stakeholders have input in this process, particularly private landowners who may be impacted. These trails must not be acquired through eminent domain, and the process must seek solutions to the problems they may create.
- CO 1.5 **UNDECIDED** We have concerns about this and cannot take a position without more information
- CO 1.6 **OPPOSE** We oppose unless it specifically says it will not be through private lands

- CO 1.8 **OPPOSE** We absolutely oppose – will seek legal counsel on this issue. This is not the role of the county. This language appears to have been inserted by environmental interests. Stewardship of private lands is dictated by existing laws, and the county has no business in this.
- CO 1.9 **SUPPORT** We support, although the location of equestrian facilities needs to have minimal impacts on surrounding ag operations
- CO 1.12 **OPPOSE** We oppose as there are private property concerns
- CO 1.18 **UNDECIDED** We conditionally support, but need more information
- CO 1.19 **OPPOSE** This is referring to BRBNA partnership, which has yet to take a position on the Snow Mountain NCA. Both the NCA and the Blue Ridge trail are highly controversial activities being promoted by a few environmental organizations. Until (if) it becomes law, it does not belong in this document.
- CO 1.20 **UNDECIDED** We need more information on how this would affect private landowners and private property rights
- CO 1.25 **OPPOSE** We have concerns about private property rights
- CO 1.28 **OPPOSE** We have concerns about private property rights
- CO-A1 **OPPOSE** We oppose as written, as there are trespassing, vandalism, and private property rights concerns that need to be addressed before we could support this
- CO-A2 **SUPPORT**
- CO-A3 **OPPOSE** We have concerns about the use of eminent domain. This needs to say granting fee title or easements is "voluntary, never mandatory". There is also the concern of endangered species moving to private lands. See response to policy CO 1.19 above. This is not the county's role.
- CO-A4 **OPPOSE** See response to policy CO 1.19 above – same concerns
- CO-A6 **SUPPORT**
- CO-A7 **OPPOSE** We have concerns about the use of eminent domain. These should state it's only to be through public lands, never private lands. See response to CO 1.2
- CO-A8 **OPPOSE** see CO 1.2 above, same concerns
- CO-A9 **UNDECIDED** There is the possible problem of endangered species moving to neighboring farms
- CO-A13 **SUPPORT** We support as long as it doesn't affect private property
- CO-A14 **SUPPORT** We support as long as it doesn't affect private property

- CO 2.2 **SUPPORT** We support as long as this is strictly voluntary
- CO 2.3 **OPPOSE** Comments were previously made regarding water quality and food safety issues
- CO 2.6 **OPPOSE** We are cautious -- others may want fish introduced into areas they are not currently inhabiting. We could support if there are assurances this will not affect water deliveries to ag lands
- CO 2.12 **OPPOSE** same as above
- CO 2.16 **OPPOSE** same as above
- CO 2.17 **OPPOSE** We opposed this with comments in the Ag Element
- CO 2.18 **SUPPORT**
- CO 2.21 **OPPOSE** This is not the County's place to dictate this. It must be a voluntary effort, which is currently underway through the Oak Woodlands program.
- CO 2.24 **OPPOSE** This is contradictory with AG 2.14. Converting open ditches to underground pipes, or drop lines is a proven way to reduce water usage, the goal of AG 2.14. This language should all be voluntary, willing landowners should be compensated for participating, and there must be no negative impacts of neighbors from wildlife depredation. The science behind this needs to be addressed with the recent spinach E.Coli contamination issues that arose in Salinas. Either packers or consumers need to find a way to deal with or accept reasonable risk from E.Coli, or it could have huge ramifications for wildlife friendly farming practices.
- CO 2.25 **OPPOSE** Wildlife does not always work with farming practices. This decision needs to be left to the grower. The County should not be involved. See above
- CO 2.26 **OPPOSE** The County should not be telling farmers how to run their business. This is a grower decision. See above
- CO 2.27 **OPPOSE** Wildlife does not always work with farming practices -- see above
- CO 2.28 **OPPOSE** Most easements don't address wildlife friendly issues, unless that is a specific requirement of the funder i.e. Swainson's Hawk mitigation, or habitat easements. All conservation easements are voluntary, and the terms are between the funder and the seller. The County should not be dictating easement terms.
- CO 2.38 **SUPPORT**
- CO-A21 **SUPPORT**
- CO-A24 **CONDITIONAL SUPPORT** We would support if the word "voluntary" is added
- CO-A24 and A25 **CONDITIONAL SUPPORT** We would support if the word "voluntary" is added, and make sure "encourage" stays is, and it is never made mandatory

- CO-A26 **OPPOSE** This should only apply to public lands, not to private lands
- CO-A28 **OPPOSE** The word "voluntary" needs to be added, and the County needs to develop an EIR to evaluate the economic impact to landowners

GROUNDWATER

- Implementation of Program **OPPOSE PROPOSED GOUNRDWATER ORDINANCE** The description of the condition of groundwater in Yolo County seems to be overly negative toward agriculture, assuming agriculture is the culprit for all groundwater problems in the County. The IWRMP prepared by the WRA should be looked at for guidance in managing Yolo County's groundwater issues. A groundwater ordinance is not necessarily a bad thing. While a bad ordinance would be intolerable, a good ordinance (developed with the agricultural community could be beneficial. A countywide water agency is unnecessary.
- CO 5.1 **OPPOSE** The existing WRA is working just fine. The county should not be involved – let the water people, cities, reclamation districts and growers work this out
- CO 5.2 **SUPPORT**
- CO 5.3 **OPPOSE** The County should not be in control. Who would manage? Sustained Yield is a term of art that means over the long term the basin is not in overdraft. Any sustainable yield definition must account for agricultural uses
- CO 5.4 **SUPPORT**
- CO 5.5 **OPPOSE** Water conservation and quality should be integrated where appropriate, not necessarily "in all aspects"
- CO 5.6 **OPPOSE** See Actions A71, A72, A76, A89, A90 and A96
- CO 5.10 **OPPOSE** Priority is a matter of state law. But this policy apparently encourages water purveyors to develop a plan for responding to dry periods including the allocation of water supply to priority users. No action associated with this policy.
- CO 5.11 **SUPPORT** We are very supportive
- CO 5.12 **UNDECIDED** The only issue here is what is means by "integrated management." Presumably this does not mean the same as regulation – i.e. State control of groundwater – but it would be nice to have that clarified
- CO 5.13 **SUPPORT** We are very supportive
- CO 5.14 **OPPOSE** "Convert land" is not described. This could mean that a barn, house or other structure could require this demonstration. How? By eminent domain?
- CO 5.16 **SUPPORT** Agriculture would want to be very involved in this. Payment for not being able to use land? This is currently required by SB 610 (Water code 10910et seq.)
- CO 5.17 **SUPPORT**

- CO 5.18 **SUPPORT**
- CO 5.19 **SUPPORT**
- CO 5.20 **OPPOSE** This policy should explicitly exclude agriculture
- CO 5.21 **UNDECIDED** OK to encourage, but need more information
- CO 5.22 **OPPOSE** Presumes agriculture is harming water quality, and possibly also wasting water. It must be recognized that legacy problems cannot be cured by controlling current production practices. County should fund any changes in methods
- CO-A62 **OPPOSE** Presupposes existence of a County Water Agency to report to. Requires reporting when it has not been demonstrated that there is a need. Need assurances that data will be kept private (i.e.: especially for "other" individual water users)
- CO-A69 **OPPOSE** Generally water transfers are acceptable if they do not harm other water users. Water Districts in Yolo County are interested in surface transfers wherein the surface water lost is replaced with groundwater. An export ordinance would try and prevent or limit this. A good export ordinance would merely make sure that the effects of any transfer were known. If there was harm, California water law offers a remedy. Or, ordinance could simply limit transfers to those transfers that don't "harm" existing/future water supplies.
- CO-A70 **OPPOSE** suggest: "to maximize the yield of the overall water resource" in place of "to make the most efficient use..." (proposed language from Water Education Foundation website.) "groundwaters"??? Should be surface and ground waters
- CO-A71 **OPPOSE** This does mean well meters which will mean well fees or taxes. Data is not needed unless there is a demonstrated problem with the aquifer. Additionally, ag water use is accurately estimated by the Department of Conservation and Department of Water Resources. See comment on CO-A62 regarding private data.
- CO-A72 **OPPOSE** For what purpose? It appears the County wants to know where the wells are for planning purposes. For instance, if a proposed development is near a well, a mapping program could head off problems
- CO-A73 **OPPOSE** What is a 20% improvement in water use efficiency? The wording makes no sense – it could be anything from using 20% less water (Like Governor's 20% by 2020 plan) to improving the efficiency rate by 20%. Ag should not be expected to use water more efficiently, since this is often not feasible and should not be expected. Any requirement regarding efficiency should be funded by the County. Seems contradictory to AG 2.14
- CO-A75 **OPPOSE** what is this?
- CO-A76 **OPPOSE** grading ordinances can be very problematic

- CO-A78 **OPPOSE** Groundwater ordinances need not be directed at "cumulative impacts of incremental groundwater extraction." Although that term is unclear, groundwater rights as they relate to each other, known as correlative rights, are a matter of state law and may not be controlled by the County. County should develop a groundwater ordinance for the purpose of protecting the groundwater resources of Yolo County.
- CO-A80 **OPPOSE** This is not needed
- CO-A81 **OPPOSE** Define BMPs We are leery of anyone setting BMPs for growers. Growers should set BMPs, and they should be very flexible. We would want to be involved in this if it's enacted
- CO-A82 **UNDECIDED** Could pose an unnecessary burden on rural properties. All fixtures would need to be replaced on old rural homes.
- CO-A84 **OPPOSE** This is between the landowners. County does not need be involved
- CO-A86 **CONCERN** It should be clarified that agriculture is exempt from this policy
- CO-A90 **OPPOSE** Routine ag practices and changes should not be viewed as "development". Clarify that this does not apply to agriculture. Of particular concern is the situation where the County perceives agricultural intensification (pasture converted to orchard) as a development
- CO-A91 **OPPOSE** The State already regulates, we don't need another layer of County regulations
- CO-A92 **OPPOSE** Countywide water authority is of uncertain value. The functions of water agencies are often described by State law, therefore the laundry list of issues – water conservation, flood control, water conveyance, and water exports – ignores the statutory requirements
- CO-A96 **OPPOSE** Which discretionary permits? (The future grading ordinance?) BMPs are not defined and should not be referenced since it could mean anything
- CO-A108 **UNDECIDED** We believe you mean converting carbon dioxide, not storing carbon dioxide. Would this be for new development, or would this apply to existing locations?
- CO-A109 **OPPOSE** This needs to exempt ag infrastructure. You will have a hard time applying this to some of the rural development

LAND USE & COMMUNITY CHARACTER ELEMENT

- LU 2.3 **OPPOSE** We oppose the requirement for a Use Permit. This should be voluntary, and probably needs more discussion to make sure it does not infringe on property rights
- LU 3.5 **UNDECIDED** This would prohibit the County from placing the reentry facility in Madison
- LU 3.8 **UNDECIDED** This would prohibit the County from placing the reentry facility in Madison

- LU 3.9 **OPPOSE** We surveyed our members in 2005 on this exact issue. The majority of responses did not want clustering, and they did not want restrictions placed on residences in rural areas
- CC 1.6 **OPPOSE** This should not apply to ag enterprises. We would recommend better casino signage on western rural roads, as many rural residents have been unduly burdened
- CC 1.8 **OPPOSE** This should not apply to ag enterprises
- CC 1.9 **OPPOSE** This should not apply to ag enterprises, it discourages converting to electric uses, which the State and Air Districts are promoting
- CC 1.10 **OPPOSE** This is a private property rights issue
- CC 1.12 **OPPOSE** This should not apply to agriculture, and this is a private property rights issue. The County can promote more trash amnesty days at the landfill to help clean up rural blight.
- CC 1.15 **OPPOSE** This should not apply to agriculture, and this is a private property rights issue
- CC 1.16 thru 1.19 **OPPOSE** This should not apply to agriculture
- CC 2.3 **OPPOSE** This should not go through private property, only apply to public lands
- CC 2.11 **OPPOSE** This would prevent upscale housing from being considered for the unincorporated areas, always keeping the unincorporated areas with lower valued housing. This is a market issue. The County has no control in the correlation between real estate housing and the job market. Issuing more building permits isn't a solution either. Salary ranges may be impacted by global or regional issues.
- CC 2.13 **OPPOSE** Where did this come from? 5 acres is too much area. Who is going to maintain these parks?
- CC 2.16 **OPPOSE** Narrow streets are problematic Natomas has them and there is no parking, fire trucks and emergency vehicles cannot get through. The county doesn't control where schools are located. The casino paid for noise walls for Capay Valley residents – this would have prevented the walls
- CC 3.3 **OPPOSE** Prices/wages? Don't insert this limitation
- CC 4.13 **OPPOSE** This is too restrictive
- CC 4.26 **OPPOSE** This should only apply to public places, not to private. Must be voluntarily funded without tax dollars
- CC A26 **OPPOSE** Violates private property rights. Perhaps the neighbors can be notified if a ridgeline project is being submitted.
- CC A28 **OPPOSE** Private property rights issues – No to Use Permits. See previous comments.

March 11, 2005

Yolo County Planning and Public Works Department
292 West Beamer Street
Woodland CA 95695

RE: Draft Yolo County Parks Plan Update

The Yolo County Farm Bureau is surprised and disappointed (offended?) by the assault on constitutionally protected private property in the newly released plan.

When Linda Fiack attended our Land Use Committee meeting she gave a very reasonable presentation of the plan's goals. She said it was more of a conceptual document that would respect the rights of adjacent property owners and look for opportunities to work with willing sellers. There was also discussion about using the Sonoma County Parks Plan as a model for the Yolo County Parks plan update.

The Blue Ridge trail doesn't fit any of this. It is a specific proposal, a line drawn on the map right through numerous blocks of private property who's owners have made it very, very clear on several occasions within the past few years that the answer is no. Its inclusion in the document is very counter productive. It should be removed from the plan.

There have been possibilities for more public access in this area for some time. Several landowners have agritourism or hunting club ventures. Several have land that connects to Berryessa Peak. If Andrew Foulks and others had tried to make friends or work a deal with these people, they might be hiking up there already. Instead he has tried to mount public assaults that have offended the people he should have been trying to work with, and it may have set his efforts back by a generation. At this point, the first thing that needs to be done to start to repair this situation would be to remove Mr. Foulks from the committee.

We also see a major conflict with Chad Robert's firm being hired as the consultant on this project.

With over 300,000 acres of public land in the Berryessa -Blue Ridge Nature area already available to the few hikers, antagonistic efforts to buy them more, when there are so many other needs, seems like a bad priority.

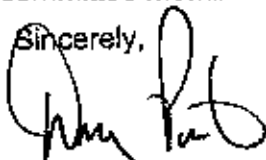
Yolo County Planning and Public Works Department
March 11, 2005
Page 2

We feel that a far better approach to increasing public opportunities for access to uncrowded open space would be if the county would establish a data base of land owners who were willing to open trails for hiking, bird watching, riding etc. Land owners could set parameters they were comfortable with, the county wouldn't need to maintain anything but a web site, and it would increase the agritourism that the county wants to promote. Especially since park maintenance funds are so scarce, this is probably the best opportunity for well managed, increased access.

The Conaway ranch plans seem to be very premature and inappropriate. The county is able to proceed with it's eminent domain case without CEQA documents because they say they will be maintaining the status quo. Now here is a county plan proposing major changes. This could make legal proceedings more difficult, or at the very least force the county to begin a lengthy and expensive CEQA process.

The mention of the gateway park in the middle of the Blue Ridge needs to be dropped also. Where it is drawn there are only a handful of possibilities, and as the Committee heard from Mr. Chapman, they are not interested.

We are also concerned that the committee seemed so out of touch. Apparently having only one committee member with knowledge and appreciation for land owner concerns was insufficient.

Sincerely,


Doug Priest
President

David Morrison

71.

From: Denise Sagara [denise@yolofarmbureau.org]
Sent: Monday, December 01, 2008 8:26 AM
To: David Morrison
Cc: Chris Ochoa; Chuck Dudley (Chuck Dudley); Eric Paulsen; Fred & Alice Manas; Joe F Martinez; Tim Miramontes
Subject: General Plan comments

I know this is late and don't know if you can accept this...but we didn't submit comments on the section that mentions revisiting the SMUD issue. Farm Bureau's position is that whoever provides electricity/power for the county should provide it for ALL the county, not just for the cities. SMUD only wanted the cities earlier, not the ag areas.

Thanks!

Denise Sagara

Executive Director
Yolo County Farm Bureau
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Woodland CA 95776
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Y O L O C O U N T Y
F L O O D C O N T R O L &
W A T E R C O N S E R V A T I O N
D I S T R I C T

72.



November 20, 2008

David Morrison
Assistant Director -- Development Services
Planning and Public Works Department
292 West Beamer Street
Woodland, CA 95695-2598

Subject: Comments Regarding the County of Yolo Draft 2030 Countywide General Plan

Dear Mr. Morrison:

Following are comments from the Yolo County Flood Control and Water Conservation District (District) regarding the County of Yolo Draft 2030 Countywide General Plan (General Plan).

The District commends the Board of Supervisors, County staff and consultants on their efforts so far. Without question, the General Plan is a forward looking document. We appreciate the complexity of such an undertaking and the intellectual and political difficulties involved. We also applaud everyone involved in the extensive outreach/public information effort.

As you know, the District is an independent California Special District with a Board of Directors that is appointed by the Board of Supervisors. The District's service area in Yolo County alone covers approximately 200,000 acres. The District owns and manages various water rights on the Cache Creek/Clear Lake system (Clear Lake, Indian Valley Reservoir and Cache Creek itself). It also has the legal responsibility to operate and maintain an extensive infrastructure (dams, reservoirs, 160 miles of canals, and numerous bridges, road crossings and culverts). This infrastructure is critical to the continued success of both the agricultural and environmental health of Yolo County. Throughout its almost 60 years of existence, the District has been a local and regional leader in water resource planning and management. It currently is the lead agency on a number of projects and actions described in the Integrated Regional Water Management Plan (IRWMP).

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Tim O'Halloran
General Manager

Mr. David Morrison
November 20, 2008
Page Two

While time constraints and other District obligations have prevented us from completing a comprehensive review of the draft, we believe the comments below will help improve the General Plan. If the future planning process and timeline allow, we would be delighted to work closely with County staff and consultants to ensure that the District's, the County's and the public's water resource management interests are fully expressed.

Our comments are offered in the spirit of making the General Plan more relevant to the District and the Yolo County community at-large. These comments have not been formally adopted by the whole Board of Directors. However the Board did at its November meeting direct staff to provide comments on the General Plan. These comments have been reviewed by a Board ad hoc committee consisting of Chair Erik Vink and Director Jim Mayer and are consistent with District objectives and past practices. Again, if the process and timeline allows for further review and input, the District offers its resources and abilities in any way that the General Plan team thinks appropriate. On a side note, The District was contacted last week by two of your consultants to assist in the development of the associated FIR. Upon completion of these General Plan comments, District staff will contact the consultants to see in what way we can assist their efforts.

Respectfully submitted,



Tim O'Halloran
General Manager

Enclosures

General Comments

The following comments are mostly general in nature and are followed by specific comments on various sections of the General Plan (primarily the Water Resources section of the Conservation and Open Space Element).

1. Visionary Nature of General Plan.

As stated previously, the District is very impressed by the comprehensive and visionary nature of the General Plan. The District appreciates the difficulty in deciding "what goes where" when there is so much overlap among resources and responsibilities. In particular, the linking of goals and policies creates a framework of accountability that will help in the long-term implementation of the General Plan.

2. Commitment to Agriculture

The District appreciates and supports the County's continuing commitment, as expressed throughout the document, to supporting an economically viable and environmentally sustainable agriculture sector.

3. District Perspective on Water Resource Planning

In our experience in managing both surface and ground water we are constantly confronted with the fact that our water resources cannot be parsed into simple program functions. Preserving the quantity and quality of our water resources requires understanding of the ecological character of our watersheds, careful consideration of agricultural and municipal needs, acknowledgement of uncertainties we face, and respect for the culture and people throughout Yolo County. We also realize that our water resources are part of a larger system, that water is not defined by political boundaries but behaves in ways defined by geology, ecology, hydrology, and the built infrastructure that we and our neighbors have put in place. It is our belief that water resources are best considered from the perspective of an integrated system, providing multiple benefits, addressing multiple needs.

The nexus between this system and land use planning implies a need to balance among multiple needs and interests. Little, if anything, in water management is black and white. Each choice we make creates repercussions that ripple through the varied interests and demands being placed on the resource. This characteristic can be seen in this draft of the General Plan, where water issues pop up in the facilities, conservation, health & safety, and agricultural elements. From this perspective the policies and actions could be organized into aspects that deal with the nature and quality of the resource base and aspects that deal with the governance and use of water. This might help clarify and streamline the presentation of policies and actions. It would also serve to highlight the linkages among the General Plan elements that deal with water. We recommend that the General Plan include a specific statement about the integrated, multi-benefit requirements of water management and the need to strike a balance among these needs. We also recommend that a set of icons similar to the climate change icon be used to illustrate when a policy or action links to a policy or action in another element of the general plan. Alternatively, a table of linked policies and actions could be developed.

4. **The County and its Partners: Partnering as a Principle**

In many aspects of the General Plan the concepts put forth require efforts beyond the ability and jurisdiction of the County. The District and other agencies and organizations offer specialized expertise and efficiencies in disciplines critical to the success of the Yolo County vision. For example, the District in cooperation with the WRA member agencies (including Yolo County), and the State of California, has already spent many years and over a million dollars developing a comprehensive groundwater monitoring program (as called for in Action CO-A62) including a publicly accessible database of the collected data. Other actions assigned to County Departments point to work already being done by others in the community. By rewriting these actions to acknowledge the work in progress the County can assure its participation without redundant efforts.

While the County must present a plan for its actions, successful implementation will require the coordinated and collaborative efforts of other agencies, organizations and individuals. The District appreciates that a theme of partnering appears throughout the draft General Plan elements. However, the General Plan would be well served to identify these dependencies where they already exist and include an explicit principle in the Vision and Principles chapter that underscores the intention to enter into partnerships in order to economically and efficiently achieve the General Plan's objectives.

5. **IRWMP as a Key Partnership for Water Resource Management**

The IRWMP was constructed with County participation by an extensive group of water resource managers throughout Yolo County and the region. It is designed with a presumption of pursuing sustainability of water resources. It reflects an exhaustive analysis of needs and capabilities, and contains foundational actions and integrated projects that broadly and specifically support the ideas put forth in the draft General Plan. It is designed to be an adaptive plan, changing with time as circumstances demand, and therefore has the capacity to respond to new initiatives and directives that emerge in the General Plan update. We recommend the incorporation of the complete Integrated Regional Water Management Plan as a base component of the Water Resources section of the General Plan.

6. **Canals as Critical Infrastructure**

The General Plan does not seem to fully recognize the critical nature of the District infrastructure (canals and water delivery system) to the vitality of the County's economic, social and environmental health. For example, without the Capay Diversion Dam and associated 160 miles of canal system, surface water would simply not be available in western Yolo County. This surface water unavailability would rapidly lead to a decline in the ability to effectively and sustainably farm most of western Yolo County. In the District's opinion the importance of its water delivery infrastructure is on par with the other types of public infrastructure such as roads, railroads, and airports. In addition to its importance as a water conveyance mechanism, the canal system provides a natural riparian corridor. The District is engaged in a comprehensive program that incorporates native habitat into its day-to-day operations and maintenance programs. The District recommends incorporating a narrative description and a map of its delivery system into

the General Plan, presumably in either the Circulation Element or the Public Facilities and Services Element. Suggested policies that could be associated with the District infrastructure are included in the specific comments section below.

7. **Other Related Efforts**

Page CO-5, section 2, lists "Other Related Efforts". While this is helpful in listing some of the other plans, programs and organizations involved in the conservation and open space element, it does not describe how these efforts will be synced into the county's efforts to implement the General Plan. As mentioned above, the County recently adopted the Integrated Regional Water Management Plan. This multi-year, multi-agency effort culminated in a document that is intended to be the blueprint for water resource action development and implementation. There are many other water plans, such as groundwater management plans that are not mentioned in the Draft General Plan. Page IN-8, section 6, of the General Plan does describe generally the relationship to other plans, and states that they must be reviewed for consistency. Assuming that these other plans are not incorporated directly into the General Plan, it should be made clear what happens in the case of an inconsistency between plans.

8. **"Directive Terms" Used with Actions**

The County should consider carefully the verb used in each of the action items. There is a world of difference between saying "develop" rather than "consider". For example, Action CO-A79 states "Develop and adopt a groundwater management ordinance to address the cumulative impacts of incremental groundwater extraction." Given that large parts of the County already have adopted State approved groundwater management plans, that Yolo County already enjoys the benefit of one of the most comprehensive and sophisticated groundwater monitoring programs in the State, and that the technical data concludes that most parts of the County have substantial and improving groundwater levels, it seems more appropriate to "consider" why and whether a groundwater ordinance should be adopted before committing to "develop" one. This example is used simply to illustrate the importance of using appropriate words to describe the commitment that the County is making in this document. Proposed changes to specific policies and actions are included in the "specific comments" below.

9. **Implementation Program**

While impressive, the Water Resources action list, responsibilities and associated timeframes appear to be unrealistic for the County to do alone with existing resources. The practicality of the action list could be increased if the final document did the following: Estimated the costs or staff effort required to implement them; established priorities, even if tiered into categories, such as high, medium and low; cross-referenced the actions against the IRWMP's action list; and, identified other agencies that are already doing this work or might be tapped to do the work. This additional information would improve the chances that this visionary document will be implemented, and also help to identify overlapping or redundant policies and actions that could be consolidated. We encourage the authors to try to consolidate overlapping policies and actions whenever possible. Additionally, the District has a strong concern about how actions from the IRWMP (or new ones that might arise from time to time) that are not identified in the

General Plan will be handled. One of the great strengths of the IRWMP was that it allows for actions to come in or out of the document as circumstances dictate. The District requests that the General Plan describe how it intends to incorporate the addition of new actions, and if there is a "penalty" for not having them listed in the final document?

10. **District Areas of Expertise**

In reviewing the list of recommended actions in the Water Resources section of the Conservation and Open Space Element, we are struck by how many of them refer to initiatives that are already being managed to some extent by the District or other entities. The District has established credibility and ongoing programs in many areas of water resource planning and management including but not limited to; groundwater level and quality monitoring, surface water flow and quality measurement, water resource database and information management, conjunctive use planning, SCADA system (wireless monitoring) resource management, canal bank habitat establishment and management, and water rights analysis and protection. This is not to imply that we know or can do it all. We often rely on our stewardship partners (including the County) or outside consultants to help the District achieve its goals. As the County looks to implement its water resource "actions", we ask that you consider utilizing existing District as well as other outside resources to help achieve the County's objectives.

Specific Comments: Our specific comments are organized as attachments. These attachments include;

- Attachment A: Policies and actions related to protecting and enhancing critical District infrastructure.
- Attachment B: Factual Corrections to the Draft General Plan, Conservation and Open Space Element, Section G, Water Resources
- Attachment C: Redline (track changes) version of the Conservation and Open Space Element
- Attachment D: Redline (track changes) version of the Health and Safety Element, Section 2. Flood Hazards

A CD containing electronic (digital) files of this letter and attachments C and D are included in this transmittal.

Attachment "A"

Attachment A: Policies and actions related to protecting and enhancing critical District infrastructure.

As was noted in the “general comments” section, the District’s infrastructure (Dams, canals, road crossings, bridges, etc.) is critical to the economic and environmental well being of the County.

The following suggested draft policies/actions are submitted for your consideration for inclusion in the General Plan.

1. Joint planning by the County and YCFCWCD shall be undertaken for maintenance and repairs where County maintained infrastructure can affect the District’s operations or infrastructure or where District maintenance and repairs can affect County operations or infrastructure.
2. As part of any new development planning process, consider and mitigate for impacts to District facilities. These impacts include but are not limited to; public safety liabilities, increased trash, and increased District operational and maintenance costs.
3. Support State and/or Federal legislation that would reduce the liabilities of governmental agencies if their facilities, such as canal bank roads, are used by the public for recreational purposes.
4. Support State and/or Federal legislation that would create safe harbor agreements for canal bank habitat and fishery restoration and enhancement programs.
5. Consider the use of special funds to assist with the modernization and maintenance of Capay Dam and the Moore Siphon to ensure the stewardship of Cache Creek and improve restoration efforts.
6. Reduce or eliminate dumping fees for disposal of non-District debris collected by District personnel throughout its rural service area.
7. Development of flood control and stormwater programs shall seek to improve the reliability and quality of water supplies and delivery of water.

Attachment "B"

Attachment B: Factual Corrections to the Draft General Plan, Conservation and Open Space Element, Section G, Water Resources

Figure CO-1 Existing Public Parks and Trails.

Wild Wings Park is shown located at YCFCWCD Headquarters, about one mile from its true location.

Figure CO-6 Major Waterways and Surface Waters

Lake Almanor is shown in Sutter County, hundreds of miles from its actual location.

G.1.a.i. CO-46

The West Adams Canal is incorrectly listed as the 'Adams' Canal.

The final paragraph gives the impression that all reclaimed gravel mine "lakes" will be turned over to the County.

G.1.a.ii. CO-46

The wording of the water quality section implies that the YCFCWCD and the CVRWQCB are the only agencies that perform regular water quality monitoring in the County. However more than 30 agencies/entities perform regular water quality testing and 45 agencies/entities collect water related data.

Boron and Hg are not considered agricultural pollutants.

Nutrients are not considered a mine drainage problem in our area.

Footnote 7 is an excellent reference, but is more than 10 years old and describes the entire Sacramento River Basin. It should not be considered a primary reference for Yolo County water quality.

G.1.a.iii CO-47

"Recharge of aquifers typically occurs along the streambeds of creeks and canals." This first sentence of the third paragraph is a true statement. However, please note that 80% of the recharge within the District comes from applied irrigation water and direct rainfall. For comparison, Cache Creek amounts to about 8% of the total recharge on average. (YCFCWCD WMP 2000). These proportions for the District can be used to estimate relative proportions county-wide

The Yolo Subsidence Monitoring Project has been merged with the DWR Sacramento Valley GPS Height-Modernization Project.

G.1.a.iv.b. CO-49 Water Planning and Regulation

A short discussion of Groundwater Management Plans, Urban Water Management Plans, and Agricultural Water Management Plans adopted in Yolo County is needed for this section.

G.1.a.iv.b. CO-50

Table CO-6 contains good information, although it also includes incorporated cities, not just unincorporated areas.

The list of water districts in Yolo County is incomplete. Missing are the Colusa Drain Water Users Association, RD108, RD2035, RD737, RD730, and RD2068. Additionally, Yolo Zamora Water District should not be considered a major water district, as it does not deliver any water.

Third paragraph of page CO-50 appears to be an "Action".

Table CO-6 Water System Conditions by Unincorporated Area

North Davis Meadows is a separate water system managed under contract by the City of Davis for the County. It is not physically connected to the City's water system. Only Willow Bank, El Macero, and Royal Oaks should be considered as part of the City's system.

West Sacramento water hardness problems are likely small or non-existent since the City is now on surface water.

Figure CO-8 Map of Water Agency Boundaries
Needs to be corrected.

G.1.c CO-53

Integrate Water Resources Management Plan (IWRMP) should be changed to "Integrated Regional Water Management Plan (IRWMP)".

Attachment "C"

Attachment C: Redline (track changes) version of the Conversation and Open Space Element

We apologize in advance for any difficulty you have in reading and interpreting this section. As in any review by multiple parties and different versions of software the track changes and comments tend to get confusing. If given more time, we would be happy to clean this section up to make our comments easier to read. We did struggle with considering what would be easier for the reviewers; renumbering and editing of the original document or simply inserting our comments and letting you insert them as you felt appropriate. In the end we did some of both. We would have deleted those sections of the Conversation and Open Space Element in order to make it easier on the comment reviewers, but were concerned that it would affect the overall numbering scheme of the overall element.

A hardcopy of the redline version is inserted after this page. The electronic version is a separate file titled "YCFWCD redline version of C&OS Element".

7 CONSERVATION AND OPEN SPACE ELEMENT

This element focuses on a working landscape that provides balanced management of the County's multiple natural and cultural resources. Working landscapes are those managed to provide economic vitality while simultaneously preserving critical ecological functions, processes and habitats. Open space and habitat preserves are woven together with other land uses in a way that dovetails the benefits to both the natural resource base and the community and economic activities. The goals and policies also speak to a connected and accessible open space system that respects the agricultural needs and provides communities separated by green spaces that are linked by a network of trails. The element anticipates full integration of the Yolo Natural Heritage Program for multi-species protection and relies on the Integrated Regional Water Management Plan as the blueprint for water resources management. Future expansion of mineral resource extraction programs via the Cache Creek Area Plan and development of the future Cache Creek Parkway are addressed. Local actions to reduce greenhouse gases and promote alternative energy opportunities are also emphasized.

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Uncertainty regarding future regulations and appropriate policy strategies for climate change are particularly challenging at the time of this update. In addition to a section on climate change within this element, policies and actions that address climate change appear throughout the entire General Plan and are identified by a small "C" icon. The County is committed to the reduction of greenhouse gases and has sought to balance this goal with other community values.

Similarly, the County faces uncertainty regarding future land uses and governance in the Delta. This section also contains a section on the Delta region, and there are additional Delta-related goals, policies, and actions throughout all the elements.

Much of the natural resources within the county depend on some level of natural disturbance, e.g. flood and fire regimes. Allowing a degree of disturbance is important to maintain the vitality of habitats and natural community associations, while constraining these episodes of disturbance is important to protect property and public safety. Some forms of disturbance, such as the influence of invasive species do not enhance the resource base and generally are discouraged. Managing disturbance is a balance between preserving ecology and protecting property and safety. The policies and actions in this element are intended to preserve key natural processes and functions and are linked to policy and actions in other elements of this plan that are focused on protection and safety.

A. Introduction

1. Context

Yolo County's open spaces (including working agricultural landscapes) play a critical role in defining the identity of the County, incorporating many of the key natural and cultural heritage resources of local communities, and maintaining distinct boundaries between the cities and unincorporated communities. Protecting and enhancing this open space system and the natural, cultural and agricultural legacy it contains is of critical concern to the County.

The Conservation and Open Space Element provides direction regarding the preservation of open space and the conservation, continued use, and enhancement of natural resources in Yolo County. The County is committed to conserving its open spaces, biological resources, mineral, cultural resources, water resources, air quality, and energy resources, and to addressing climate change. This element provides for an integrated network of open space in Yolo County that is a framework to safeguard plant and wildlife habitat, provide for ongoing use of productive natural resources, protect archaeological and historical resources and heritage, and improve air quality in the Sacramento air basin. It provides for an ongoing commitment by the County to conserve energy and reduce the County's contribution to greenhouse gas emissions.

2. Contents

This element is organized into subsections which specifically cover:

1. Natural Open Space (Goal CO-1)
2. Biological Resources (Goal CO-2)
3. Mineral Resources (Goal CO-3)
4. Cultural Resources (Goal CO-4)
5. Water Resources (Goal CO-5)
6. Air Quality (Goal CO-6)
7. Energy Conservation (Goal CO-7)
8. Climate Change (Goal CO-8)
9. Delta Region (Goal CO-9)

The subsection for each of these topics is formatted as follows: Background Information, Policy Framework, and Implementation Program. Within the Policy Framework and Implementation Program sections, policies and actions related to climate change are denoted with the symbol "C".

3. Background Information

Summary background information for each topic of this element is provided with the relevant subsection below.

B. Regulatory Framework

1. State General Plan Requirements

This Conservation and Open Space Element combines two of the seven required elements of a General Plan: the Conservation Element, which is required to address the conservation, development and utilization of natural resources, and the Open Space Element, which is required to address open space lands used for a variety of purposes.

Specifically, State law (Sections 65302d.1 and 65302d.3 of the Government Code) mandates that the Conservation Element address the following:

- Water and its hydraulic force
- Forests
- Soils
- Rivers, creeks, streams, and other waters
- Harbors
- Fisheries
- Wildlife
- Minerals
- Other natural resources
- Effects of planned development on natural resources on public lands
- Effects of planned development on natural resources on military installations
- Flood corridors
- Riparian habitats
- Flood areas
- Groundwater recharge
- Stormwater management

State law (Section 65302d.2 of the Government Code) specifies that the Conservation Element may also address the following:

- Reclamation of land and waters
- Pollution of streams and other waters
- Regulation of stream channels
- Erosion of soils, beaches, and shores
- Protection of watersheds
- Rock, sand, and gravel resources

State law (Section 65560b of the Government Code and Sections 5097.9 and 5097.993 of the Public Resources Code) mandates that the Open Space Element address the following:

- Open space for preservation of natural resources, including:
 - Areas required for the preservation of plant and animal life
 - Habitat areas for fish and wildlife species
 - Areas required for ecologic and other scientific study purposes
 - Rivers, streams, bays, and estuaries

- Coastal beaches, lakeshores, banks of rivers and streams
- Watershed lands
- Open space for the managed production of resources, including:
 - Forest land
 - Range land
 - Agricultural lands
 - Areas of economic importance for the production of food and fiber
 - Areas required for recharge of groundwater basins
 - Bays, estuaries, marshes, rivers, and streams important for commercial fisheries
 - Areas containing mineral deposits
- Open space for outdoor recreation, including:
 - Areas of outstanding scenic, historic, and cultural value
 - Areas particularly suited for park and recreation purposes
 - Access to lakeshores, beaches, rivers, and streams
 - Areas that link major recreation and open space land such as utility easements, river banks, stream banks, and scenic highway corridors
- Open space for public health and safety, including:
 - Earthquake fault zones
 - Unstable soil areas
 - Floodplains
 - Watersheds
 - High fire risk areas
 - Areas required for the protection of water quality and water reservoirs
 - Areas required for the protection and enhancement of air quality
 - Other areas which require special management or regulation because of hazardous or special conditions
- Open space in support of the mission of military installations, including:
 - Areas adjacent to military installations and military training routes
 - Areas underlying restricted military airspace
- Open space for the protection of Native American places, features, and objects, including:
 - Sanctified cemeteries
 - Places of worship
 - Religious or ceremonial sites
 - Sacred shrines
 - Historic, cultural or sacred sites
 - Historic or prehistoric ruins
 - Burial grounds
 - Archeological or historic sites
 - Inscription sites
 - Rock art

Yolo County has addressed all of the above items within this element, with the following exceptions:

- Forests and forest lands are addressed in this element only as related to various woodland habitats as the County has no commercial forest land or timber resources. "Urban forestry" is addressed in this element, and in the Land Use and Community Character Element, as it relates to tree canopy in community areas. Orchards and other tree crops are addressed in the Agriculture and Economic Development Element.
- Soils as a resource are addressed primarily in the Agriculture and Economic Development Element. Soil characteristics such as erosion and stability are addressed primarily in the Health and Safety Element.
- The County has no harbors. The Port of Sacramento is addressed in the Circulation Element.
- The County essentially has no military installations and facilities. The only military facility in the County, the McClellan/Davis Telecommunication Site, has been declared surplus by the Air Force and is now closed. Discussion regarding this facility and plans to convert it to a County open space facility are addressed in this element.
- Areas subject to flooding, flood corridors, flood plains, and flood management are addressed in the Health and Safety Element.
- Stormwater management and drainage service providers are addressed in the Public Facilities and Services Element.
- Agriculture, range land, and the production of food and fiber are addressed in the Agriculture and Economic Development Element.
- Bays are not addressed in this General Plan as the County does not have these resources; however other biological resources are addressed in this element. Policies relating to the Delta, which is an estuary, are addressed throughout the General Plan.
- Coastal beaches are not addressed in this General Plan as the County does not have these resources. Other water resources and features are addressed in this element.
- Commercial fisheries are not addressed in this General Plan as the County does not have a commercial fishery resource or industry. Other fishery resources are addressed in this element.
- Utility easements are addressed in the Public Facilities and Services Element.
- The County has no designated federal or State Scenic Highways. A portion of State Route 16 (from approximately the town of Capay at County Road 85, north to the County line) is identified by Caltrans as "eligible" for designation as a State Scenic Highway but is not officially designated. Locally designated scenic roadways are addressed in the Land Use and Community Character Element.

- Seismic, geological, and wildland fire hazards are addressed in the Health and Safety Element.

2. Other Related Efforts

The following local and regional plans, programs, and organizations affect or are involved in the implementation of conservation and open space protection in Yolo County:

- Yolo Natural Heritage Program (YNHP)
- Oak Woodlands Management Plan
- Parks and Open Space Master Plan
- Cache Creek Area Plan (CCAP)
- Integrated Regional Water Management Plan (IRWMP)
- SACOG Rural Urban Connection Strategy
- Sacramento River Conservation Area Forum
- Yolo Bypass Working Group and Planning Forum
- Putah Creek Council and Plan
- Cache Creek Conservancy
- Blue Ridge Berryessa Snow Mountain Natural Conservation Area Partnership
- Yolo Land Trust
- Yolo County Resource Conservation District
- Tuleyome
- Other private non-profit organizations
- Yolo County Flood Control and Water Conservation District
- Water Resources Association of Yolo County
- California Audubon

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There are many other plans not listed. How to treat the others not listed?

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C. Publicly Owned Open Space

1. Background Information

a. Existing Publicly Owned Open Space

[This section addresses County "resource" parks including regional and open space parkland managed for multiple objectives. Existing parks and trails are shown in Figure CO-1. Community (neighborhood parks), such as those located in Esparto and Dunnigan, and the County Historical Museum facility are discussed in the Public Facilities and Services Element. A complete list of existing County Parks is provided in Table CO-1. A map of proposed future park facilities is provided in Figure CO-2.]

The term "resource" park is used herein to refer to regional and/or open space parkland, typically much larger in size than a community park, typically characterized by passive and/or very low-management uses, and are intended to serve the county populations rather than an individual community. In contrast community (or neighborhood) parks are small in area (less than 10 acres), usually located in or near small population centers, and developed for a variety of community uses, gatherings, and events. These

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Comment [MSO:Office1]: This focus on County holdings confuses the focus of this element. Is it addressing the resource base county wide, i.e. including public and private lands or simply dealing with County owned property? This must be clarified. We recommend dealing with the resource base, but this approach requires considerable attention to capabilities, authorities and limitations of partner entities. The plan would need to describe how the County will act in relation to its partners. The policies would focus on County interests. Actions could include County support for outside entities.

parks are intended to provide active recreational areas, such as playgrounds, sports fields, and sports courts.

Yolo County owns and/or manages a number of resource parks; however, the vast majority of open space in the County remains in private ownership. Additional public and quasi-public landowners include non-profit organizations, tribal groups and non-County public agencies, including the incorporated cities, the University of California, the State and federal governments. Figure CO-3 shows the various existing publicly-owned or managed open space lands in the county.

Large open space areas in Yolo County are owned and managed by a variety of entities including federal, State, and local government, and private interests. Publicly-owned lands account for approximately six percent of the county land area. Large properties under public ownership and/or management in Yolo County include:

- The Yolo Bypass Wildlife Area (Wildlife Area) is 16,770 acres of managed wildlife habitat and agricultural land located within the southern floodway of the Yolo Bypass.¹ A portion of the Wildlife Area spans Interstate 80 adjacent to the Yolo Causeway, between the cities of Davis and West Sacramento. The Wildlife Area is

¹ The Yolo Basin Foundation, *Land Management Plan for the Yolo Bypass Wildlife Area*, page 1-1.

Figure CO-1 Existing Public Parks and Trails

TABLE CO-1 EXISTING COUNTY PARKS

Park	Acreage	Location
Dunnigan Community Park	0.5	3640 County Road 89A, Dunnigan
Esparto Community Park	1	17001 Yolo Avenue, Esparto
Cache Creek Canyon Regional Park, Trail System and Campground	685	1475 State Route 16, Rumsey
Camp Haswell Park	7	1999 State Route 16, Rumsey
Capay Open Space Park and Trail System	41	15560 County Road 85, Capay
Clarksburg River Access Facility	4	38125 Old River Road, Clarksburg
Elkhorn Regional Park	49	18989 Old River Road, West Sacramento
Gibson House Museum	2	512 Gibson Road, Woodland
Grasslands Regional Park and Trail System	313	30475 County Road 104, Davis
Helvetia Oak Grove	12	20470 Old River Road, West Sacramento
Knights Landing Day Use Area	4	9350 State Route 45, Knights Landing
Vernon A. Nichols Park	21	17195 County Road 57, Guinda
Otto Ranch Open Space and Trail System	587	West of State Route 16, Rumsey
Putah Creek Fishing Access	87	24135 State Route 128, Winters
Wild Wings Park	17	North of Goldoneye Street and south of Cache Creek, Woodland
Correll-Rodgers Park	40	East of County Road 96 and south of Cache Creek, Woodland
Cache Creek Nature Preserve	119	Southwest corner of County Road 20X and 94B, north of Cache Creek, Woodland
TOTAL	1976.5	

a public and private restoration project managed by the California Department of Fish and Game (DFG) in consultation with the Yolo Basin Foundation. In 1997, the U.S. Army Corps of Engineers restored wetlands and associated habitats within the Wildlife Area. This project, originally named the Yolo Basin Wetlands, was renamed the Vic Fazio Yolo Wildlife Area. The entire wildlife area, however, is officially named the Yolo Bypass Wildlife Area.

- The Blue Ridge Berryessa Snow Mountain Natural Conservation Area (NCA) is a conservation partnership involving various public lands working with private owners and non-profit organizations to coordinate open space among willing participants. Much of the area remains within private ownership and is not subject to State or federal management. The NCA consists of 785,000 acres along the spine of the western Blue Ridge Mountains in the northwestern part of the county. In addition to Yolo County, the NCA extends into Colusa, Solano, Napa and Lake Counties.

Figure CO-2 Future Parks and Trails

Figure CO-3 Publicly-Owned Open Space Areas

- The Cache Creek Resources Management Plan (CCRMP) is a component of the Cache Creek Area Plan (CCAP). The CCAP is an adopted part of this General Plan. The focus of the CCAP is groundwater protection, agricultural preservation, restoration of Cache Creek, and limitation and regulation of mining. The CCRMP eliminated in-channel commercial mining from Lower Cache Creek, and established an improvement program for implementing on-going projects to improve channel stability and restore habitat along the creek banks. The CCRMP provides the policy framework for restoration of the 14.5-mile Lower Cache Creek. It includes specific implementation standards within the Cache Creek Improvement Program (CCIP). The CCIP is the implementation plan for the CCRMP that identifies categories of restoration/protection projects along a precisely defined stretch of creek. These include: bank stabilization, channel maintenance, revegetation, and habitat restoration according to identified design requirements.

The federal government owns 30,225 acres² and the State of California owns 17,257 acres³ of land in unincorporated Yolo County managed for open space purposes. Each of the four Yolo County cities own public open space, mostly in the form of parkland within their boundaries. Notably, the City of Davis has acquired open space lands in a number of locations around its edge, and a number of open space areas are owned and managed by the University of California.

Public access to open space in Yolo County is restricted on most privately-owned open space lands and some public sites. Agricultural lands are often considered informal open space, and indeed are treated by the State as Open Space for the Managed Production of Resources. Most agricultural lands are privately held and generally are not open to the public. As noted above, agriculture and rangeland are addressed in the Agriculture and Economic Development Element.

Of the publicly held open space in the County, Lower Cache Creek provides natural open space and controlled public access to former gravel mining re-use areas. This is anticipated to expand over time, pursuant to the CCRMP. The Yolo Bypass, Putah Creek and Willow Slough allow public access within the waterway but do not allow access to adjacent, privately-owned properties. Other public open space areas are restricted for health and safety, security, or to protect sensitive habitats or species. Public access in the proximity of private property may become restricted because of compatibility concerns, such as trespass and nuisance.

b. Future Publicly Owned Open Space

Yolo County has great potential for new open space acquisitions in the future. Expanding resource parks opportunities and other open space is important to the values

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² Within the unincorporated area only. Does not include Tribal Trust land, UC University, freeways, or highways.

³ Within the unincorporated area only. Does not include UC Davis, freeways, highways.

of the County. As shown in Figure CO-2, the County plans to add new resources parks and other open space in key areas over time.

2. Policy Framework

GOAL CO-1	<u>Publicly Owned Open Space. Provide a diverse, connected and accessible network of open space, to enhance natural resources and their appropriate use.</u>
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- Policy CO-1.1 Expand and enhance an integrated network of open space to support agriculture, recreation, natural resources, historic and tribal resources, habitat, water management, aesthetics, and other beneficial uses.
- Policy CO-1.2 Develop a connected system of recreational trails to link communities and parks throughout the county. (S)
- Policy CO-1.3 Create a network of regional parks and open space corridors that highlight unique natural resources and recreational opportunities for a variety of users. (S)
- Policy CO-1.4 Provision of an appropriate level of public facilities and infrastructure shall be a priority for all County park facilities.
- Policy CO-1.5 Establish future regional park and open space facilities close to population centers. (S)
- Policy CO-1.6 Develop "gateways" or trailheads that provide access for the public to County, State, and federal lands.
- Policy CO-1.7 Support efforts by willing landowners and non-profit groups to provide new opportunities for outdoor recreation.
- Policy CO-1.8 Encourage responsible stewardship of private lands, while promoting increased opportunities to access waterways and other public natural areas amidst privately-owned land.
- Policy CO-1.9 Promote agriculture-related recreation, such as farm stays, dude ranches, wineries, equestrian facilities, etc.
- Policy CO-1.10 Avoid long-term degradation of environmental resources in new and existing regional park and open space facilities.
- Policy CO-1.11 The target threshold for resource parks (regional and open space parks) shall be 20 acres per 1,000 total County population (both unincorporated and incorporated). Larger ratios may be appropriate in

Specific Plan areas to accommodate important natural features and/or safety areas.

- Policy CO-1.12 Support development of the proposed Delta Trail and coordinate the development of recreation areas and public open space with regional trail planning. (E)
- Policy CO-1.13 Create opportunities for ecotourism.
- Policy CO-1.14 Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable, properly adopted, natural open space policies of the Land Use and Resource Management Plan of the Delta Protection Commission.
- Policy CO-1.15 Support the preservation of open space via acquisition of fee title or easement interest by land trusts, government agencies, and conservancies that are consistent with this General Plan.
- Policy CO-1.16 Support efforts to acquire either fee title or easements on additional open space areas adjoining existing protected natural resource areas to increase the size, connectivity, and buffering of existing habitat. (E)
- Policy CO-1.17 Coordinate open space acquisition with the Yolo Natural Heritage Program.
- Policy CO-1.18 Out-of-county mitigation easements in Yolo County for the loss of open space, agriculture, or habitat in other jurisdictions, and flood easements in Yolo County are generally acceptable, provided the easements meet the following criteria:
- Prior notification to Yolo County;
 - Consistency with the goals and policies of the Yolo County General Plan, particularly as related to planned growth, infrastructure, and agricultural districts;
 - Secured water rights and infrastructure to economically maintain the proposed mitigation use;
 - Requirements that existing agricultural operations continue to be farmed for commercial gain;
 - Prohibitions on residential use;
 - Mandatory wildlife friendly strategies and practices; and
 - Compensation to Yolo County for all lost direct and indirect revenue.

Where proposed easements meet the identified criteria, no further approval is needed. Where one or more criteria are not met, discretionary approval is required.

- Policy CO-1.19 Work with the Blue Ridge Berryessa Snow Mountain Natural Conservation Area Partnership, the Bureau of Land Management, Napa County and other landowners on a voluntary basis to complete the Blue Ridge Trail through voluntary acquisitions.
- Policy CO-1.20 Support the development of a new State Park in Yolo County, with emphasis on expanding opportunities for family camping and water-related recreation, as well as the Great Central Valley initiative to create an agricultural heritage park.
- Policy CO-1.21 Encourage the Bureau of the Interior and/or the General Services Administration to transfer the site of DQ University to County or other appropriate local public agency ownership, should it no longer be used for tribal education.
- Policy CO-1.22 Support development of a new State off-highway vehicle (OHV) park at an appropriate location.
- Policy CO-1.23 Emphasize the use of native grasses, shrubs and trees as the primary focus of landscaping and restoration work within resource parks. (S)
- Policy CO-1.24 Work with concessionaires and lessees to provide recreational amenities that do not conflict with other park uses or general public access.
- Policy CO-1.25 Increase public access and recreational uses along waterways wherever feasible, particularly Cache Creek, Lower Putah Creek, the Yolo Bypass, and the Sacramento River.
- Policy CO-1.26 Allow for specified areas of resource parks to be preserved, enhanced and/or restored as mitigation sites, consistent with the requirements of appropriate regulatory agencies, provided that adequate compensation, including funding for operations and maintenance of the mitigation, is provided.
- Policy CO-1.27 Support development of a new California Indian Heritage Center in the City of West Sacramento located at the confluence of the Sacramento and American rivers.
- Policy CO-1.28 Support improved access for bank fishing.

Comment (12): The location could be advantageous to flood control efforts as part of the YFCWCD's delivery system.

3. Implementation Program

- Action CO-A1 Update the Parks Master Plan as necessary to implement the goals, policies, and actions of relevant portions of the Conservation and Open Space Element. Develop and implement a system of open space corridors and trails that connects each community and city by integrating waterways, scenic areas, significant habitat areas, County parks, and other special resource areas. (P) (Policy CO-1.1, Policy CO-1.2, Policy CO-1.3, Policy CO-1.12, Policy CO-1.25, Policy CO-1.26)
Responsibility: Parks and Resources Department
Timeframe: 2010/2011
- Action CO-A2 Establish permanent green buffers between cities and unincorporated towns to ensure the continued distinctiveness of each community. (P) (Policy CO-1.2)
Responsibility: Planning and Public Works Department
Timeframe: 2012/2013
- Action CO-A3 Acquire fee title or easements to promote wildlife migration routes focusing on Cache Creek, the Yolo Bypass, Putah Creek, Willow Slough, the Sacramento River, and the Blue Ridge area. (Policy CO-1.1, Policy CO-1.3, Policy CO-1.15, Policy CO-1.17, Policy CO-1.19, Policy CO-1.25)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A4 Seek to acquire voluntary easements to ensure connectivity with the conservation areas established through the Blue Ridge Berryessa Snow Mountain Natural Conservation Area Partnership. (P) (Policy CO-1.1, Policy CO-1.3, Policy CO-1.8, Policy CO-1.16, Policy CO-1.19)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A5 Pursuant to the Cache Creek Area Plan, develop a recreation plan for the Cache Creek Parkway including a range of public activities and uses. (Policy CO-1.25)
Responsibility: Parks and Resources Department
Timeframe: 2012/2013
- Action CO-A6 Clearly define boundaries between public open space and private agricultural lands through mapping, fencing, and/or other appropriate means. (Policy CO-1.1)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A7 Connect the future Bay Delta Trail system, the future trail system in the lower Yolo Bypass, and the future Cache Creek Parkway system and

link those to the American River Bikeway system in Sacramento County. (Policy CO-1.1, Policy CO-1.3, Policy CO-1.12, Policy CO-1.19, Policy CO-1.29)

Responsibility: Parks and Resources Department

Timeframe: 2029/2030

- Action CO-A8 Prioritize the construction of multi-use trails that provide links between already established trails and bicycle routes. (Policy CO-1.1, Policy CO-1.2, Policy CO-1.4)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A9 Develop a Park Plan for the McClellan/Davis Telecommunications Site to incorporate the property into the adjoining Grasslands Regional Park, including the establishment of an endowment and ongoing monitoring of endangered species. (Policy CO-1.1, Policy CO-1.10)
Responsibility: County Administrator's Office, General Services Department, Parks and Resources Department
Timeframe: 2008/2009
- Action CO-A10 Pursue State grant funds to restore areas of the County impacted by illegal OHV activity, to protect areas from unauthorized use through enforcement, and to redirect users to the OHV park. (Policy CO-1.10, Policy CO-1.22)
Responsibility: Parks and Resources Department
Timeframe: 2019/2020
- Action CO-A11 Pursue a countywide tax and/or bond assessment so that all residents contribute fairly to the planning, acquisition, operation, and maintenance of resource parks. (Policy CO-1.1, Policy CO-1.2, Policy CO-1.3, Policy CO-1.4)
Responsibility: County Administrator's Office
Timeframe: 2010/2011
- Action CO-A12 Provide recreational uses that are river or creek dependent in locations directly on Cache Creek, Putah Creek, and the Sacramento River. Examples include fishing, canoeing, boating, and nature observation. With the exception of boat launches and docks, more active uses, such as parking, restrooms, and picnic areas, shall be located in areas away from the river and sensitive riparian habitat. (Policy CO-1.1, Policy CO-1.25, Policy CO-1.28, Policy CO-1.29)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A13 Cluster recreational uses at various locations along Cache Creek, Lower Putah Creek, and the Sacramento River, to reduce habitat dis-

turbance and provide efficient and cost-effective management by the County. (Policy CO-1.10)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A14 Design access to resource parks, whether by road or by trail, to go through a controlled entry point, wherever feasible. (Policy CO-1.10)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A15 Implement the Elkhorn Specific Plan to establish a resource park, which will establish public access to the Helvetia oak grove, create public access along the waterway north of County Road 22, and integrate management of both sites with the nearby Elkhorn Regional Park. (Policy CO-1.1, Policy CO-1.6, Policy CO-1.25)
Responsibility: Planning and Public Works Department
Timeframe: 2019/2020

Action CO-A16 Combine parks and trails with open space and wildlife conservation areas where appropriate. (Policy CO-1.1, Policy CO-1.10)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A17 Enhance parking and access at existing resource parks, including the Putah Creek fishing access, Cache Creek Canyon Regional Park, and the Camp Haswell/Otis Ranch property. (Policy CO-1.4)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A18 Include educational programs, materials, and signage in resource parks regarding water, geology, plants, animals, events, and people to strengthen an appreciation of local place and identity. (Policy CO-1.1)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A19 Establish a program for camp hosts at all resource parks, where feasible. (Policy CO-1.1, Policy CO-1.10)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A20 Allow for public agencies to establish and/or enhance habitat within specific areas of resource parks, consistent with the requirements of appropriate regulatory agencies, where an endowment is created to fund the monitoring and maintenance of the habitat. (Policy CO-1.1, Policy CO-1.15, Policy CO-1.26)

Responsibility: Parks and Resources Department
Timeframe: Ongoing

D. Biological Resources

1. Background Information

Climate change presents great changes to the biological resources within the county. Shifts in food sources, timing of hibernation and active growing periods, chilling and heating, all have direct links to shifting climate and define many essential relationships in natural communities. These shifts also have the potential to dramatically impact agriculture, possibly changing pest complexes, water demands, and even viability of some crops and cropping patterns. Traditional approaches to biological resource conservation have focused on defining habitat areas. With looming changes in climate, there is less confidence that a particular parcel will retain the habitat features needed to ensure maintenance of desired species. In the coming decades a greater emphasis on corridors and gradients of conditions will need to be built into natural resource management in order to allow natural communities to adjust to forcing factors generated by climate change. Policies and practices associated with this emphasis are new and will require flexibility for agencies and land managers to adjust to the demands of managing a dynamic system.

There are five broad categories of vegetation types in Yolo County: agricultural lands, grasslands, woodlands, riparian areas and wetlands, as shown in Figure CO-4. Each of these vegetation types are important habitat areas that support a range of species, including federally and State-listed species.

There are many species listed as threatened or endangered that were known to occur in Yolo County.⁴ These species are summarized in Table CO-2.

a. Agricultural Lands

Agricultural lands provide habitat value and habitat features. A flooded rice field provides habitat for waterfowl and giant garter snakes. An irrigation ditch provides nesting substrate for burrowing owls. Field crops provide the primary foraging for the county's growing population of Swainson's hawks. Typically, less intensively managed agricultural areas support the greatest diversity of wildlife species.

Yolo County has one of the highest Swainson's hawk nesting densities in California. Along with Solano, San Joaquin and in part Sacramento Counties, this region forms the core of the remaining population of hawks in the State. The hawk is dependent on agriculture, particularly large, contiguous agricultural areas.

⁴ County of Yolo, *Yolo NCCP/HCP Baseline Report*, July, 19, 2005.

b. Grasslands

Annual grasslands provide foraging and refuge habitat. Animals graze on wild grass species such as wild oats, soft chess and barleys, and find cover in non-native forbs. Typical wildlife species that are known to occur in the Yolo grasslands are turkey vultures, red-tailed hawks and coyotes.

c. Riparian Corridors

The term "riparian corridor" refers to rivers or streams and the habitat areas along their banks. Riparian corridors provide for nesting, foraging, and refuge habitat; they support a multi-layered, vegetative community and diverse wildlife. Riparian corridors have particularly high habitat value despite being significantly altered and constrained. In addition to high habitat value and wildlife diversity, riparian corridors link together the open space framework and blocks of habitat, and they facilitate movement of species through less hospitable environments. Riparian corridors are habitat for fish, including salmon and steelhead, and are primary nesting habitat for birds such as Swainson's hawks.

Figure CO-4 Vegetative Types

TABLE CO-2 FEDERAL- AND STATE-LISTED THREATENED AND ENDANGERED SPECIES
 WITH POTENTIAL TO OCCUR IN YOLO COUNTY

Species Common Name	Federal Listed	State Listed
PLANTS		
Palmate-bracted birdsbeak	E	E
Colusa grass	T	E
Crampton's luctoria	E	E
CRUSTACEANS		
Conservancy fairy shrimp	E	-
Vernal pool fairy shrimp	T	-
Vernal pool tadpole shrimp	E	-
INSECTS		
Valley elderberry longhorn beetle	T	-
AMPHIBIANS		
California tiger salamander	E	SSC
California red-legged frog	T	SSC
Giant garter snake	T	T
BIRDS		
Bald eagle	T	F
Swainson's hawk	-	T
American peregrine falcon	-	E
Western snowy plover	T	SSC
Greater sandhill crane	SSC	T
Western yellow-billed cuckoo	SSC	E
Bank swallow	-	T
FISH		
Sacramento River Winter-run Chinook salmon	E	E
Delta smelt	T	T
Central Valley spring-run Chinook salmon	T	T
Central Valley steelhead	T	-

Notes: - = no listing.

Federal-Listed

E = listed as endangered under the federal Endangered Species Act.
 T = listed as threatened under the federal Endangered Species Act.
 SC = species of concern; species for which existing information indicates it may warrant listing but for which substantial biological information to support a proposed rule is lacking.

State-Listed

E = listed as endangered under the California Endangered Species Act.
 T = listed as threatened under the California Endangered Species Act.
 SSC = species of special concern in California.

Source: Yolo Natural Heritage Program, Yolo NCCPA ICP Baseline Report Administrative Working Draft, July 2005, pages 50-59.

d. Woodlands

Woodlands provide nesting, roosting, foraging and refuge habitat. Within Yolo County there are four distinct types of woodlands: oak woodland, wooded savannah, scattered oaks in agricultural areas, and elderberry savannah. The elderberry savannah community is habitat for the elderberry bush, the host plant for the federally-listed valley elderberry longhorn beetle. The threatened valley elderberry longhorn beetle is listed at this time. However, delisting the beetle was recommended by the Sacramento Fish and Wildlife Office in October 2006. Valley oak, cottonwood, walnut, and willow trees are particularly important to the Swainson's hawk as nesting habitat.

e. Wetlands

Wetlands provide foraging, nesting and refuge habitat. Within Yolo County, there are four distinct types of wetland communities: marsh, vernal pool, pond/lake/open water, and alkali sinks. Marsh and pond/lake/open water communities are wet year-round, whereas vernal pool and alkali sinks are seasonal wetlands. Vernal pools and alkali sinks are State-listed Significant Natural Communities and support State and federally listed wildlife species.

f. Natural Communities Conservation Plan/ Habitat Conservation Plan

The County is a member of the Yolo County Habitat Joint Powers Authority (JPA), which is responsible for developing a combined Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP), known as the Yolo Natural Heritage Program (Yolo NHP). Habitat conservation plans identify the most biologically significant regions and outline measures to protect the ecological integrity of valuable habitat areas. Conservation plans are required to address special-status species, plants and animals that are considered sufficiently rare by the scientific community and qualify for legal protection under State and/or federal Endangered Species Acts. The purpose of the Yolo NHP is to identify and protect the county's most biologically significant regions and most valuable habitat areas, in amounts and locations sufficient to sustain target species. The JPA also manages the Swainson's Hawk Interim Fee Mitigation Program, which purchases conservation easements to provide habitat for the threatened Swainson's hawk.

g. Yolo County Oak Woodland Conservation and Enhancement Plan

In January 2007, the Parks and Natural Resources Management Division published the *Yolo County Oak Woodland Conservation and Enhancement Plan*. Since 87 percent of the county's oak woodlands are privately-owned, the purpose of this plan is to help coordinate voluntary oak woodland conservation and enhancement efforts and guide oak woodland mitigation. The Plan establishes a program to identify areas in Yolo County with the highest value habitat. Conservation and enhancement of these high value areas is addressed by encouraging landowners to preserve these areas from urban and rural development. With this plan, the County is able to apply for State funding and other funding sources.

2. Policy Framework

GOAL CO-2	<u>Biological Resources. Enhance biodiversity through the sustainable protection of species that are sensitive, rare, declining, unique or represent valuable local biological resources.</u>
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|----------------|---|
| Policy CO-2.1 | <u>A description of key ecological processes needed to sustain each natural community type should be developed and steps taken to ensure, to the degree possible, that these processes are maintained.</u> |
| Policy CO-2.2 | <u>Where information indicates that critical habitat could be shifting on the landscape, strategies should be developed to accommodate and preserve the occurrence of these habitats within the county.</u> |
| Policy CO-2.3 | <u>Information sources such as Geographic Information Systems, should be improved to represent integrated biological and habitat condition needs and constraints and relate these to infrastructure and farming needs.</u> |
| Policy CO-2.4 | Adopt and implement the Natural Communities Conservation Plan/Habitat Conservation Plan developed through the Yolo Natural Heritage Program to preserve and enhance existing wildlife resources and open space. |
| Policy CO-2.5 | Preserve habitats that contribute to the county's rich biodiversity including grasslands, wetlands, oak woodlands, riparian, agriculture and aquatic. |
| Policy CO-2.6 | Emphasize the use of wildlife-friendly farming practices within the County's Agricultural Districts. |
| Policy CO-2.7 | Preserve and restore healthy riparian corridors. |
| Policy CO-2.8 | Protect and enhance both riparian and non-riparian wetlands. |
| Policy CO-2.9 | Protect, maintain, restore and enhance habitat for sensitive fish species, including the following: green sturgeon, Delta smelt, Central Valley steelhead, Chinook Salmon (Spring, Winter, and Fall runs), river lamprey, Pacific lamprey, Sacramento splittail, hardhead, California roach, Central Valley hitch, speckled dace, white sturgeon, Sacramento pike minnow, and Sacramento Perch. |
| Policy CO-2.10 | Cooperate with the Department of Fish and Game in inventorying streams with spawning and rearing habitat, evaluating those streams' existing and potential habitat value, and determining current and potential fish population levels. |

- Policy CO-2.11 Encourage stream side property owners and appropriate public agencies to participate in fishery enhancement projects.
- Policy CO-2.12 Encourage all public land management agencies to preserve, maintain and enhance the fish habitat within their jurisdiction.
- Policy CO-2.13 Promote the collection of baseline data to determine the present populations of anadromous fish species in the County's streams.
- Policy CO-2.14 Support the continued use of prescribed burning to improve the quality of the county's watersheds for fish and wildlife habitat.
- Policy CO-2.15 Encourage activities that will improve or maintain anadromous fish habitat.
- Policy CO-2.16 Require the protection of riparian corridors to maintain beneficial streamside vegetation.
- Policy CO-2.17 Coordinate with regional efforts that seek to recover populations of federal and State-listed threatened and endangered species, as well as other rare species, to viable levels.
- Policy CO-2.18 Minimize loss and support the restoration of suitable habitat for rare, threatened and endangered species including but not limited to Swainson's hawk, valley elderberry longhorn beetle, burrowing owls, giant garter snake, and California tiger salamander.
- Policy CO-2.19 Encourage the restoration of native habitat on publicly-owned lands.
- Policy CO-2.20 Require clustering and creative site planning in new development areas to preserve and enhance areas of contiguous open space to the extent feasible.
- Policy CO-2.21 Ensure that open space buffers are provided between sensitive habitat and planned development.
- Policy CO-2.22 Support the use of managed fire in oak woodlands to encourage oak recruitment, where feasible, consistent with safety and air quality concerns.
- Policy CO-2.23 Promote the use of oak woodlands conservation banks to mitigate for both development impacts and greenhouse gas emissions under the proposed State carbon credit program. (f)
- Policy CO-2.24 Allow no net loss of oak woodlands, alkali sinks, rare soils, or geological substrates that support rare endemic species. The limited loss of blue oak woodland and grasslands may be acceptable, where the

fragmentation of large forests exceeding 40 acres is avoided and losses are mitigated to the extent feasible.

- Policy CO-2.25 Encourage the use of mosquito abatement methods that are compatible with protecting fish and wildlife, including native insect pollinators.
- Policy CO-2.26 Existing natural vegetation shall be conserved where possible and integrated into new development if appropriate.
- Policy CO-2.27 Urge agricultural landowners to incorporate wildlife-friendly habitat features, such as:
- Native-shrub hedgerows;
 - Berms;
 - Flooded agriculture, such as rice fields;
 - Vegetated ditches, ponds and nest trees, to attract native pollinators and seed dispersers;
 - Restoration of field margins (filter strips), ponds, and woodlands in non-farmed areas;
 - Use of native species and grassland restoration in margin areas;
 - Management and maintenance of irrigation and drainage canals to provide habitat, support native species, and serve as wildlife movement corridors;
 - Winter stubble management to provide foraging; and
 - Discourage the conversion of open ditches to underground pipes, which could adversely affect giant garter snakes and other species that rely on open waters.
- Policy CO-2.28 Coordinate with the Natural Resource Conservation Service, UC Cooperative Extension, and other farm organizations to encourage farming practices and the management of private agricultural land that is supportive of wildlife habitat values.
- Policy CO-2.29 Support the use of organic farming methods to minimize the use of products such as pesticides, fuels and fertilizers that degrade habitat and harm plants and wildlife. (S)
- Policy CO-2.30 Encourage the use of wildlife-friendly Best Management Practices to minimize unintentional killing of wildlife by restricting mowing during nesting season for ground-nesting birds or draining of wetlands before fledging of wetland species.
- Policy CO-2.31 Promote wildlife-friendly farming through mechanisms such as farmland trusts, conservation easements and safe harbor-type agreements.

- Policy CO-2.32 Prohibit development within a minimum of 100 feet from the banks of all lakes, perennial ponds, rivers, creeks, sloughs, and perennial streams. The setback will allow for fire and flood protection, a natural riparian corridor (or wetland vegetation), a planned recreational trail where applicable, and vegetated landscape for stormwater to pass through before it enters the water body. Exceptions to this action include irrigation pumps, roads and bridges, levees, docks, boat ramps, and similar uses.
- Policy CO-2.33 Support efforts to coordinate the removal of non-native, invasive vegetation within watersheds and replacement with native plants. (E)
- Policy CO-2.34 Promote floodplain management techniques that increase the area of naturally inundated floodplains and the frequency of inundated floodplain habitat, restore some natural flooding processes, river meanders, and widen riparian vegetation, where feasible.
- Policy CO-2.35 Encourage the development of, and connection to, healthy marsh and riparian woodlands along the county's waterways and channels.
- Policy CO-2.36 Support efforts to reduce water temperatures via habitat restoration (e.g. increase shading vegetation) and water management (e.g. control of flows) that are compatible with the Integrated Regional Water Management Plan. Deleted: Water Resources
- Policy CO-2.37 Coordinate with local watershed groups including the Cache Creek Conservancy, Lower Putah Creek Coordinating Committee, Sacramento River Area Conservation Forum, and the Yolo Basin Foundation, to enhance biodiversity.
- Policy CO-2.38 Evaluate the need for additional water to support future riparian enhancement efforts, including the benefits of conjunctive management of groundwater and surface water resources.
- Policy CO-2.39 Balance the needs of aquatic and riparian ecosystem enhancement efforts with flood management objectives.
- Policy CO-2.40 Roads and road-related structures (bridges, culverts, retaining walls, abutments, etc.) located in or near watercourses shall be placed, designed, built, and landscaped so as to minimize the impact to riparian corridors, including reducing erosion during and after construction, accommodating flood flows, and minimizing grading on slopes greater than 20 percent.
- Policy CO-2.41 Promote native perennial grass habitat restoration and controlled fire management in grazing lands to reduce invasive species cover and enhance rangeland forage.

- Policy CO-2.42 Protect and enhance streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat and vernal pools in land planning and community design.
- Policy CO-2.43 Protect wetland ecosystems by minimizing erosion and pollution from grading, specifically during grading and construction projects.
- Policy CO-2.44 Support completion of the CDFG Visitors and Interpretive Center near the Vic Fazio Wildlife Area.
- Policy CO-2.45 Create partnerships with landowners, non-government organizations, and other public agencies to implement the Yolo County Oak Woodland Conservation and Enhancement Plan.

3. Implementation Program

- Action CO-A21 Integrate the HCP/NCCP (Natural Heritage Program) into the General Plan as appropriate. Direct habitat mitigation to strategic areas that implement the Yolo Natural Heritage Program and/or build wildlife corridors. Avoid the conversion of agricultural areas and focus on lands where wildlife values and farming practices are complementary. (Policy CO-2.1)
Responsibility: Planning and Public Works Department
Timeframe: 2009/2010 and ongoing
- Action CO-A22 Protect the habitat value and biological function of annual grasslands and oak woodlands areas. Avoid, where possible, development of the border region between the two habitat types, which is valuable to a variety of declining bird species and other wildlife. (Policy CO-2.2, Policy CO-2.16, Policy CO-2.38)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A23 Create a program to encourage the planting of new oak seedlings in appropriate locations (e.g. more than a ½-mile from water sources used by livestock), and the protection of plantings from damage by animals and people until seedlings are of sufficient size. ☹ (Policy CO-2.2, Policy CO-2.22)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A24 Adopt a heritage tree preservation ordinance. ☹ (Policy CO-2.2, Policy CO-2.22)
Responsibility: Parks and Resources Department
Timeframe: 2010/2011

- Action CO-A25 Develop a program to encourage landowners to restore degraded creek resources by:
- Removing exotic species and establishing native riparian vegetation. (E)
 - Controlling uses that are damaging to the upland reaches of creeks.
 - Adding exclusionary fencing to keep livestock out of streams and stream bank areas. (Policy CO-2.4, Policy CO-2.5, Policy CO-2.9, Policy CO-2.14, Policy CO-2.25)
- Responsibility: Parks and Resources Department
Timeframe: 2011/2012
- Action CO-A26 Establish criteria for the preservation of vernal pools that include the following:
- unusual features;
 - habitat quality;
 - watershed integrity;
 - defensibility and buffering;
 - size;
 - plant and animal species variety; and
 - presence of special status species.
- (Policy CO-2.2, Policy CO-2.8, Policy CO-2.16)
Responsibility: Parks and Resources Department
Timeframe: 2013/2014
- Action CO-A27 Prepare a complete inventory of identified streams, channels, seasonal and permanent marshland, wetlands, sloughs, riparian habitat and vernal pools in community plans, area plans and specific plans. (Policy CO-2.2, Policy CO-2.8, Policy CO-2.11)
Responsibility: Parks and Resources Department
Timeframe: 2013/2014
- Action CO-A28 Develop and implement a countywide program to rehabilitate and/or improve watersheds for the benefit of salmon and steelhead by encouraging landowner cooperation and participation and involving agencies and local groups. (Policy CO-2.2, Policy CO-2.7, Policy CO-2.8, Policy CO-2.13, Policy CO-2.15)
Responsibility: Parks and Resources Department
Timeframe: 2014/2015

Action CO-A29 Identify stream sections with important fish habitat restoration needs. Seek funding and participate in programs to address needs. (Policy CO-2.2, Policy CO-2.7, Policy CO-2.8, Policy CO-2.13, Policy CO-2.15)
Responsibility: Parks and Resources Department
Timeframe: 2014/2015

E. Mineral Resources

1. Background Information

The mineral resources section of this chapter provides goals, policies and actions that guide Yolo County in ensuring continued productivity and conservation of the County's geologic reserves.

Yolo County also has important soil resources, which can be inferred from the County's high agricultural productivity. Soils are considered to be an agricultural resource and therefore are discussed in the Agriculture Element. Expansive soils and other geologic hazards are covered in the Geologic section of the Health and Safety Element.

Yolo County has two primary mineral resources, mined aggregate and natural gas. These resources are located throughout the County. There are six aggregate mines and 25 natural gas fields currently in operation in Yolo County (see Figure CO-5).

Mining in California is regulated by the Surface Mining and Reclamation Act (SMARA) of 1975. The purpose of SMARA is to identify the presence and significance of mineral resource deposits and to govern the excavation and reclamation of these areas. SMARA requires comprehensive management plans for operational mining areas. Mineral Resources Zones (MRZs) are used by the State to define areas containing valuable deposits. The California Division of Mines and Geology classifies MRZs according to the guidelines shown in Table CO-3.

There are 1,458 acres of MRZ-1, 18,452 acres of MRZ-2, and 8,220 acres of MRZ-3 in Yolo County. The Cache Creek MRZ-2 area is a significant high-grade aggregate deposit known to contain over 900 million tons of sand and gravel.

Mining in Yolo County is regulated by the Off Channel Mining Plan (OCMP), which is a component of the Cache Creek Area Plan (CCAP). The CCAP is incorporated into this General Plan. The focus of the CCAP is groundwater protection, agricultural preservation, restoration of Cache Creek, and limitation and regulation of mining.

The OCMP restricts the location and extent of new mining to lands outside of the riparian corridor, eliminates vested processing plants and facilities at the end of the mining period, creates a fund to address unforeseen environmental concerns, and adds various environmental protections and monitoring requirements to the base requirements of State law established by SMARA. The OCMP is implemented by two related ordinances: one

regulating off-channel mining (mining outside of the creek channel) and one regulating reclamation of mined areas.

The CCAP also includes the Cache Creek Resources Management Plan (CCRMP) which includes policies and regulations to stabilize the channel, reduce erosion, protect

Figure CO-5 Mineral and Gas Resources

TABLE CO-3 **SMARA MINERAL RESOURCE ZONE CATEGORIES**

MRZ-1	Areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.
MRZ-2	Areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present. Such areas contain discovered mineral deposits that are either measured or indicated reserves as determined by such evidence as drilling records, sample analysis, surface exposure, and mine information; or such areas may be inferred reserves or deposits that are presently sub-economic as determined by limited sample analysis, exposure, and past mining history.
MRZ-3	Areas containing known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification of specific localities into the MRZ-2 category.
MRZ-4	Areas where geologic information does not rule out either the presence or absence of mineral resources. The distinction between the MRZ-1 and MRZ-4 categories is important for land-use considerations. It must be emphasized that MRZ-4 classification does not imply that there is little likelihood for the presence of mineral resources, but rather there is a lack of knowledge regarding mineral occurrence. Further exploration work could well result in the reclassification of land in MRZ-4 areas to MRZ-3 or MRZ-2 categories.

Source: Department of Conservation State Mining and Geology Board, Guidelines for Classification and Designation of Mineral Lands.

infrastructure, improve habitat values, maintain flood capacity, and provide recreational opportunities. To support those goals, the County has adopted an In-Channel Maintenance Mining Ordinance. Although commercial mining is prohibited within Lower Cache Creek, carefully regulated and limited maintenance extraction is occasionally necessary to carry out the CCRMP.

Yolo County is one of the 28 counties in California that produce gas and oil. Most of the natural gas fields in Yolo County are located along the Yolo Bypass and the Sacramento River, with more fields located in the unincorporated area of Dunnigan Hills and at the foot of the Capay Hills (see Figure CO-5). Deep on-shore gas wells, reaching a depth of nearly 2 miles, are found near the Clarksburg area. In 2007, Yolo County produced over 3 million Mcf⁵ of natural gas and 187 barrels of oil.⁶ Further research is needed to determine the extent of present day natural gas reserves in Yolo County, particularly since natural gas has become a larger part of Yolo County's economy and an important tool to reduce vehicle air emissions as a part of the effort to address climate change.

⁵ Mcf is a gas standard equal to 1,000 cubic feet.

⁶ California State Department of Conservation Division of Oil, Gas and Geothermal Resources, Online Projection/Injection, accessed July 9, 2008.

2. Policy Framework

GOAL CO-3	Mineral Resources. Protect mineral and natural gas resources to allow for their continued use in the economy.
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- Policy CO-3.1 Encourage the production and conservation of mineral resources, balanced by the consideration of important social values, including recreation, water, wildlife, agriculture, aesthetics, flood control, and other environmental factors.
- Policy CO-3.2 Ensure that mineral extraction and reclamation operations are compatible with land uses both on-site and within the surrounding area, and are performed in a manner that does not adversely affect the environment.
- Policy CO-3.3 Encourage the extraction of natural gas where compatible with both on-site and surrounding land uses, and when performed in a manner that does not adversely affect the environment.
- Policy CO-3.4 Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable, properly adopted natural gas policies of the Land Use and Resource Management Plan of the Delta Protection Commission.

3. Implementation Program

- Action CO-A30 Designate and zone lands containing identified mineral deposits to protect them from the encroachment of incompatible land uses so that aggregate resources remain available for the future. (Policy CO-3.1)
Responsibility: Planning and Public Works Department
Timeframe: 2009/2010
- Action CO-A31 Amend the County Code to allow landowners to apply for redesignation of their property when it can be demonstrated that mineral resources are not present or are not economically feasible. (Policy CO-3.1)
Responsibility: Parks and Resources Department
Timeframe: 2010/2011
- Action CO-A32 Encourage the responsible development of aggregate deposits along Cache Creek as significant both to the economy of Yolo County and the region. (Policy CO-3.1)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

- Action CO-A33 Encourage recycling of aggregate materials and products. (Policy CO-3.1)
Responsibility: Parks and Resources Department, Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A34 Regularly review regulations to ensure that they support an economically viable and competitive local aggregate industry. (Policy CO-3.1)
Responsibility: Parks and Resources Department, County Administrator's Office
Timeframe: Ongoing
- Action CO-A35 Implement the Cache Creek Area Plan to ensure the carefully managed use and conservation of sand and gravel resources, riparian habitat, ground and surface water, and recreational opportunities. (Policy CO-3.1)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A36 Monitor updates to the State Mineral Resource classification map and incorporate any needed revisions to the County's zoning and land use map. (Policy CO-3.1)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A37 Coordinate individual surface mining reclamation plans so that the development of an expanded riparian corridor along Cache Creek may be achieved. (Policy CO-3.1)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A38 Prohibit commercial mining in or adjoining Putah Creek. (Policy CO-3.1, Policy CO-3.2)
Responsibility: Parks and Resources Department, Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A39 Maintain standards and procedures for regulating surface mining and reclamation operations so that potential hazards and adverse environmental effects are reduced or eliminated. (Policy CO-3.1, Policy CO-3.2)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

- Action CO-A40 Ensure that mined areas are reclaimed to a usable condition that is readily adaptable for alternative land uses, such as agriculture, wildlife habitat, recreation, and groundwater management facilities.
Responsibility: Parks and Resources Department (Policy CO-3.1)
Timeframe: Ongoing
- Action CO-A41 Regularly update surface mining and reclamation standards to incorporate changes to State requirements, environment conditions, and County priorities. (Policy CO-3.1)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A42 Consider the exploration, drilling, and extraction of natural gas as compatible with agriculture and open space uses. (Policy CO-3.3)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A43 Evaluate any impacts to identified natural gas fields as part of the development review process. (Policy CO-3.3)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A44 Require that abandoned gas wells be sealed in accordance with State of California Division of Oil, Gas and Geothermal Resources regulations and that all drilling or production facilities be removed. Further require that the disturbed surface area be reincorporated into adjoining agricultural operations or revegetated with native vegetation within one year after abandonment. (Policy CO-3.3)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A45 Maintain and implement local and State criteria and development standards for the production, injection, and drilling of natural gas deposits. Ensure that the construction and operation of natural gas storage facilities meet all safety standards of the State of California Division of Oil, Gas and Geothermal Resources. (Policy CO-3.3)
Responsibility: Development Services Division
Timeframe: 2010/2011

F. Cultural Resources

1. Background Information

Cultural resources include archaeological, paleontological and historic resources, including cemeteries and burials outside of cemeteries. Yolo County has examples of all of these, including prehistoric Native American sites, fossilized dinosaur remains, and historical man-made artifacts, buildings, sites and landmarks.

Before the establishment of what we now know today as Yolo County, a variety of people occupied the area. The first people to inhabit the Yolo region were two Native American tribes, the Patwin and, to a lesser extent, the Plains Miwok. Euro-American explorers, specifically the Spanish, came to this area as early as 1808 in search of new land on which to establish missions. Hunter/trapper groups also came to the area in search of valuable animal pelts to sell on an international market.

Settlements in the Yolo County region began during the first quarter of the 19th Century. The first American settlers were granted land from the Mexican Cession of 1848, during which the U.S. bought the region as eleven Mexican land grants. In the beginning of U.S. control, the region was a stable, isolated farming community that was transformed into a booming agricultural area by the California Gold Rush. Fremont was the first town, founded in 1849, along the confluence of the Sacramento and Feather Rivers. It was also the first County seat, after the formal establishment of Yolo County in 1850. The County seat was moved to Washington (Broderick) in 1851, to Cacheville (Yolo) in 1857, and back to Washington in 1860. In 1862, the County seat was permanently moved to the City of Woodland.

The artifacts and legends left by these groups are important cultural resources. The preservation of cultural resources is important because they offer important educational opportunities and they provide the County with a unique sense of identity.

A countywide record search was conducted at the Northwest Information Center (NWIC) of California Historical Resources Information System at Sonoma State University, and additional sources were also used, to generate a list of over 1,200 recorded cultural resources within Yolo County. Of these, 270 are archeological resources. The locations of these resources have been kept confidential.

There are two tribes with registered traditional land in Yolo County, the Cortina Band of Indians and the Rumsey Band of Wintun Indians. The Cortina band is not known to currently own property nor be active within the County. The Rumsey Tribe is very active in the County. They are a significant landowner and employer as the operators of the Cache Creek Casino Resort in Brooks.

The Rumsey Band of Wintun Indians is a recognized sovereign nation. As such, the Department of the Interior, Bureau of Indian Affairs, holds approximately 267 acres in trust for the Rumsey Tribe (the Tribe). One site contains houses for the tribal members, a community center, and the Yocha-De-He Preparatory School. The other site is home to

the Cache Creek Casino Resort. As sovereign lands, these areas are not a part of this General Plan. The Tribe also owns several thousand acres in and around the trust lands. These properties are not held in trust and are included within this General Plan.

In 1985, the Tribe began operation of a bingo hall on trust lands in the Capay Valley, which was expanded to include card games in 1993. Three years later, there was a second expansion of the bingo hall, including several restaurants. In 1999, following approval of the State Gaming Compact, the casino added slot machines and table games to its existing facility. A third expansion began in 2002 to create the Cache Creek Casino Resort, adding additional gaming space, restaurants, event center, club, 200-room hotel, spa, and a championship golf course. Today, the Resort is the second largest employer in Yolo County (after UC Davis) with more than 2,400 employees.

In 2002, the County and the Tribe approved an Intergovernmental Agreement to: (1) establish a mechanism for mitigation of the off-Reservation impacts expected to result from the Casino Resort expansion; (2) provide financial resources to help fund those mitigation measures; and (3) strengthen the government-to-government relationship between the County and the Tribe. The Agreement committed the Tribe to a wide range of measures to reduce the environmental impact of the expansion, as well as payment of up to \$5 million annually to the County to reimburse for the costs of the impacts. The County committed to developing a mitigation program to address impacts that occurred outside of trust lands, paid for through the funds provided by the Tribe, as recommended by a County Advisory Committee for Tribal Matters. Both parties agreed to hold regularly scheduled 2x2 meetings, open to the public.

In April, 2008, the Rumsey Tribe released a Draft Tribal Environmental Impact Report (TEIR) for a new expansion of the Resort. The proposal includes 467 new hotel rooms and 27 casitas, four additional restaurants, an event/conference center, retail shops, an expansion of the spa, additional gaming floor and office space, three new swimming pools, an additional parking garage, and related support facilities and utilities. The Final TEIR has not yet been released for this project.

Yolo County has conducted consultation with Native American tribes to aid in the protection of traditional and cultural places, or sacred sites, as required by Senate Bill 18 (SB 18). For the purposes of this element, the term "sacred site" refers to any specific, discrete, narrowly delineated location that is identified by a Native American tribe, or Native American individual determined to be an appropriate authoritative representative of a Native American religion, as sacred by virtue of its established religious significance to, or ceremonial use by, a Native American religion. In coordination with the two regional tribes, no sacred sites have been identified within the County.

Section 7050.5 of the California Health and Safety Code states that, when human remains are discovered, no further site disturbance shall occur until the County Coroner has determined that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of

the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and the remains are recognized to be those of a Native American, the coroner shall contact the Native American Heritage Commission within 24 hours.

In addition to the archeological listings identified above, Yolo County maintains its own list of local historical landmarks (see Table CO-4). There are also county listings on the National Register of Historic Places, the list of California State Historical Landmarks, and the list of California Points of Historical Interest (see Table CO-5).

Historical resources are preserved by individuals, various community groups and local organizations throughout Yolo County. These groups include the County Planning Commission/Historic Preservation Commission and various volunteer historical societies. The Planning Commission serves as the Historic Preservation Commission which is tasked with establishing criteria, guidelines and standards to pursue the goals outlined in the County's Historic Preservation Ordinance. The Commission is responsible for maintaining an inventory of all historical landmarks and districts within Yolo County and recommending future historic designations to the Board of Supervisors. Permits for demolition and for alterations to historic structures are decided by the Planning Commission.

There are a number of repositories of historical artifacts and information in Yolo County, including the Yolo County Historical Museum, the Yolo County Archives and Record Center and the Hattie Weber Museum. The Yolo County Historical Museum is located in Woodland. The museum provides tours of the architecturally historic building and displays furnishings and artifacts from Yolo County's past, specifically between 1850 and 1930, and includes outbuildings that feature artifacts associated with the agricultural industry and farming lifestyle.

The Yolo County Archives and Record Center maintains a comprehensive archive of historical materials dating back from the County's beginnings in 1850. A broad range of materials are stored at the Archive and Record Center, including County documents, original tax records, old newspapers, probates, wills, civil and criminal cases, original maps of Mexican land grants, personal scrapbooks, video reels and a complete set of meeting notes from every meeting of the Yolo County Board of Supervisors.

2. Policy Framework

GOAL CO-4	<u>Cultural Resources.</u> Preserve and protect cultural resources within the County.
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Policy CO-4.1 Identify and safeguard important cultural resources.

TABLE CO-4 COUNTY-RECOGNIZED HISTORICAL RESOURCES IN UNINCORPORATED YOLO COUNTY

Common Name	Address
Yolo Library	37750 Sacramento St, Yolo, CA
James Borack House	419 Sacramento St, Yolo, CA 95697
Yolo Town Hall	37735 Sacramento St, Yolo, CA
Joseph T. Cooper House	CR 16a (Between Cr 98a & Cr 98e) Box 545, Yolo, CA
Samuel Carpenter Cottage	CR 87e W Of The End, Winters, CA95694
William L. Seawright House	SH 12B (North Side E Of Cr 87d) Winters, CA95694
Adolph Oeste House	SE Corner Patwin Rd/ Russell Blvd, Davis, CA 95616
French Residence	37858 Russell Blvd, Davis, CA 95616
Hext Brothers Farmhouse	Box 208D, Rd. 97D & SH 128, Davis, CA 95616
Gottfried Schmisser House	CR 31 & CR 96 Box 2560 Davis, CA 95616
"Yolanda"	CR 99, Box 70, at NW Corner Cr 25a, Woodland, CA 95695
William Marcus Jackson House	20123 East St. Woodland, CA 95695
Frank N. Bullard House	CR 99, Box 150 (N of CR 27) Woodland, CA
Lorenz Heinz Ranch	38331-35 CR 29, Davis, CA
B. F. Conaway Ranch House	CR 103, Box 158 (N of CR 27), Woodland, CA 95695
Nelson Bump House (Aka "Lydia" House)	S. River Road next to County Line, Clarksburg, CA
Hamilton S. Connor House	CR 144, Box 283, Clarksburg, CA
Holland Land Company Headquarters	Netherlands Rd at Central Ave., Clarksburg, CA
Lawlor & Cosby General Merchandise	S. River Road (corner of Netherlands Ave.) Clarksburg, CA
Husick Hardware	S. River Road (S of Netherlands Ave) Clarksburg, CA
St. Joseph's Church And Rectory	S. River Road, Box 52, Clarksburg, CA
Brown/Munk House	54080 S. River Road, Clarksburg, CA
Gordon Cemetery	CR 20 E of CR 92C, Yolo, CA 95697
Robert Baur House	CR 23, Box 516 East of CR 86a Madison, CA 95653
Esparto Railroad Station	16770 CR 87, Esparto, CA
Fred Wyatt House	924 and 928 Grafton, Esparto, CA 95627

Common Name	Address
Clarence Johnson Home & Shop	26621 Caypay St., Esparto, CA
loof Building, Esparto	16651-63 Yolo Ave, Esparto, CA
Henry Mefford House	CR 25 near CR 86A Madison, CA 95653
Haines Store	1110 Main St. Madison, CA 95653
Union Church Of Dunnigan	3615 CR 89A, Dunnigan, CA 95937
St. Agnes Church	SE Corner Main and Second St., Zamora, CA 95698
John Snowball Mansion	613 Front St. Knights Landing, CA
Silas/ Edson House	509 3 rd St, Knights Landing, CA
Leithold's Drug Store, Knights Land- ing	223 Mill St, Knights Landing, CA
First National & Home Savings Bank	225 Mill St, Knights Landing, CA
Masonic Lodge, Knights Landing	414 3 rd St., Knights Landing, CA
Nanney/La Due House	602 Mill St., Knights Landing, CA
Guinda Corner Store	SH 16- SW Corner CR 53, Guinda, CA
Rumsey Town Hall	SH 16 (NE Corner Laurel St.) Rumsey, CA
James Carey Montgomery House	Rt, 1, Box 1140, Davis, CA 95616

- Policy CO-4.2 Implement the provisions of the State Historical Building Code and Uniform Code for Building Conservation to balance the requirements of the Americans with Disabilities Act with preserving the architectural integrity of historic buildings and structures.
- Policy CO-4.3 Encourage owners of historic resources to preserve and rehabilitate their properties. (S)
- Policy CO-4.4 Encourage historic resources to remain in their original use whenever possible. The adaptive use of historic resources is preferred when the original use can no longer be sustained. Older residences may be converted to office/retail use in commercial areas and to tourist use in agricultural areas, so long as their historical authenticity is maintained or enhanced.

TABLE CO-5 NATIONALLY- AND STATE-RECOGNIZED HISTORICAL RESOURCES IN UNINCORPORATED YOLO COUNTY

Place Type	Location
National Register of Historic Places	
Yolo Branch Library	200 Sacramento St., Yolo
Union Church of Dunnigan	3615 County Rd. 89A, Dunnigan
Rumsey Town Hall	CA 16 at Marzanita St., Rumsey
Nelson Ranch	CA 18C between CA 113 and 102, Woodland
William B Gibson House	512 Gibson Rd., Woodland
Canon School	0.5 mi. N of Brooks, Brooks
California State Historical Landmarks	
None in Unincorporated Yolo County	
California State Points of Historical Interest	
Russell Boulevard	Between Highway 113 and Road 98, Davis
Mary's Chapel	Intersection of Road 15 and Road 98
St. Agnes Church	Road 98, Zamora
Capay School	Route 16, Capay
Leonidas Taylor Monument	West bank of the Sacramento River, northwest of Sacramento
Yolo County Courthouse	725 Court Street, Woodland
Yolo County Historical Museum	512 Gibson Road, Woodland

Source: National Register of Historic Places, the list of California State Historical Landmarks, and the list of California Points of Historical Interest, 2008

- Policy CO-4.5 Increase knowledge of historic preservation through public education and outreach programs.
- Policy CO-4.6 Support historically-oriented visitor programs at the local and regional level through the Yolo County Visitor's Bureau and similar efforts.
- Policy CO-4.7 Encourage the identification of historic resources through the integrated use of plaques and markers.

- Policy CO-4.8 Explore opportunities for promoting heritage tourism, including cooperation with regional and State marketing efforts.
- Policy CO-4.9 Promote the use of historic structures as museums, educational facilities, or other visitor-serving uses.
- Policy CO-4.10 Encourage voluntary landowner efforts to protect cultural resources consistent with State law.
- Policy CO-4.11 Honor and respect local tribal heritage.
- Policy CO-4.12 Work with culturally-affiliated tribes to identify and appropriately address cultural resources and tribal sacred sites through the development review process.
- Policy CO-4.13 Avoid or mitigate to the maximum extent feasible the impacts of development on Native American archaeological and cultural resources.
- Policy CO-4.14 Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable properly adopted cultural resources policies of the Land Use and Resource Management Plan of the Delta Protection Commission.

2. Implementation Program

- Action CO-A46 Update the Historic Preservation Ordinance on a regular basis to be consistent with applicable federal, State and local Historic Preservation requirements. (Policy CO-4, Policy CO-4.2)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A47 Update the historic resources surveys (including the Historic Features Inventory), as needed, to reflect changes due to the passage of time, loss of existing historic resources, and the availability of new or reinterpreted information. (Policy CO-4.1)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A48 Identify and establish historic districts, where appropriate, to better preserve individual historical resources and their context. (Policy CO-4.1, Policy CO-4.4)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

- Action CO-A49 Establish an inventory and map of known significant historic and cultural resources, as well as sensitive areas where such resources are likely to occur. This information is protected as confidential under State law. (Policy CO-4.1)
Responsibility: Planning and Public Works Department
Timeframe: 2011/2012
- Action CO-A50 Conduct historic resource surveys as a part of community and specific plan preparation to document and identify those resources that meet the criteria for listing at the local level, on the California Register of Historical Resources, and on the National Register of Historic Places. (Policy CO-4.1)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A51 Review and monitor demolition permits, grading permits, building permits, and other approval procedures to reinforce preservation goals. (Policy CO-4.1, Policy CO-4.2, Policy CO-4.3)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A52 Establish design guidelines for historic resources based on established federal and State standards and guidelines to address the adaptive reuse and modification of historic resources. (Policy CO-4.1, Policy CO-4.2, Policy CO-4.4)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A53 Preserve historical records and make them accessible to the public by maintaining the Yolo County Archives and Record Center. (Policy CO-4.1, Policy CO-4.5)
- Provide additional space for accommodation of the growing Archives collections
 - Ensure that the collection is housed in an appropriate archival manner
- Responsibility: County Library, General Services Department
Timeframe: Ongoing
- Action CO-A54 Require cultural resources inventories of all new development projects in areas where a preliminary site survey indicates a medium or high potential for archaeological, historical, or paleontological resources. In addition, require a mitigation plan to protect the resource before the issuance of permits. Mitigation may include:

- Having a qualified archaeologist or paleontologist present during initial grading or trenching;
- Redesign of the project to avoid historic or paleontological resources;
- Capping the site with a layer of fill; and/or
- Excavation and removal of the historical or paleontological resources and curation in an appropriate facility under the direction of a qualified professional. (Policy CO-4.1, Policy CO-4.13)

Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action CO-A55 Require that discretionary projects which involve earth disturbing activities on previously undisturbed soils in an area determined to be archaeologically sensitive perform the following:

- Enter into a cultural resources treatment agreement with the culturally affiliated tribe.
- Retain a qualified archaeologist to evaluate the site if cultural resources are discovered during the project construction. The archaeologist will have the authority to stop and redirect grading activities, in consultation with the culturally affiliated tribe and their designated monitors, to evaluate the significance of any archaeological resources discovered on the property.
- Consult with the culturally-affiliated tribe to determine the extent of impacts to archaeological resources and to create appropriate mitigation to address any impacts.
- Arrange for the monitoring of earth disturbing activities by members of the culturally affiliated tribe, including all archaeological surveys, testing, and studies, to be compensated by the developer.
- Implement the archaeologist's recommendations, subject to County approval.
- Agree to relinquish ownership of all artifacts that are found on the project area to the culturally affiliated tribe for proper treatment and disposition. (Policy CO-4.1, Policy CO-4.13)

Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action CO-A56 Require that when cultural resources (including non-tribal archeological and paleontological artifacts, as well as human remains) are encountered during site preparation or construction, all work within the vicinity of the discovery is immediately halted and the area protected from further disturbance. The project applicant shall immediately notify the

County Coroner and the Planning and Public Works Department. Where human remains are determined to be Native American, the project applicant shall consult with the Native American Heritage Commission (NAHC) to determine the person most likely descended from the deceased. The applicant shall confer with the descendant to determine appropriate treatment for the human remains, consistent with State law. (Policy CO-4.1, Policy CO-4.11, Policy CO-4.12, Policy CO-4.13)

Responsibility: Planning and Public Works Department, Sheriff-Coroner's Office

Timeframe: Ongoing

- Action CO-A57 Prohibit the removal of cultural resources from the project site except by a qualified consultant and after the County planning staff have been notified. Prehistoric resources include chert or obsidian flakes, projectile points, mortars, pestles, dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic resources include stone or adobe foundations or walls, structures and remains with square nails, and refuse deposits often in old wells and privies. (Policy CO-4.1, Policy CO-4.11)
- Responsibility: Planning and Public Works Department
- Timeframe: Ongoing

- Action CO-A58 Consult with culturally-affiliated tribes prior to amending the General Plan and adopting or amending specific plans, consistent with State law. (Policy CO-4.12, Policy CO-4.13)
- Responsibility: County Administrator's Office, Planning and Public Works Department
- Timeframe: Ongoing

- Action CO-A59 Confer with culturally-affiliated tribes prior to designating open space that includes any identified cultural places and develop a treatment and management plan for their preservation. (Policy CO-4.12, Policy CO-4.13)
- Responsibility: County Administrator's Office, Planning and Public Works Department
- Timeframe: Ongoing

- Action CO-A60 Refer all development proposals that may adversely affect cultural resources to the Northwest Information Center (NWIC) at Sonoma State University for review and comments. The NWIC will identify the presence or absence of known cultural resources and/or previously performed studies in or near a given project area and will offer recommendations regarding the need for additional studies, where necessary. If the NWIC recommends further study, the project applicant

shall contract with a qualified professional to conduct the study and make recommendations designed to avoid or minimize adverse impacts on cultural or historic resources and indicate whether further investigation is needed. All studies shall be completed and submitted to the County prior to the completion of any environmental document for the project. (Policy CO-4.1, Policy CO-4.11)

Responsibility: Planning and Public Works Department
Timeframe: Ongoing

- Action CO-A61 Refer draft environmental documents, including any studies and recommended mitigation measures, to the appropriate culturally-affiliated tribes for review and comment as part of the public review process. (Policy CO-4.1, Policy CO-4.11, Policy CO-4.12)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

G. Water Resources

There are many significant water resources in Yolo County. Major rivers, creeks, streams, drainages and sloughs running through the county irrigate agricultural fields, control floods, transport water supplies to users throughout the county and provide wildlife habitat. This section discusses the major sources of surface and groundwater supply in the county, issues related to water quality, and the important planning and regulatory efforts that are concerned with these resources. Other water-related issues, including those related to water distributions systems, water treatment, and water-related infrastructure, are addressed in the Infrastructure and Services Element of this General Plan.

1. Background Information

a. Major Water Sources

i. Surface Water

The major watersheds and surface water features in Yolo County include Cache Creek, Putah Creek, the Sacramento River, and the Yolo Bypass. These waterway areas are discussed below and are shown in Figure CO-6.

- **Cache Creek** is the outfall of Clear Lake, which is located in Lake County 50 miles northwest of Yolo County. The north fork of Cache Creek includes the ~~300,000~~ acre-foot Indian Valley Reservoir, also located in Lake County.
- **Putah Creek** begins in Lake County, flows through Napa County and the Lake Berryessa Reservoir into southern Yolo County, and eventually into the Yolo Bypass.
- **Sacramento River**, a 447-mile-long river, begins in Shasta County and passes west of the City of Sacramento. Its tributaries include the Pit, Feather, McCloud and American rivers.

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Figure CO-6 Major Waterways and Surface Waters

- The **Yolo Bypass** is a 41-mile-long, several-mile-wide levied floodplain that carries flood flows from the Sacramento River to the Sacramento Delta. Its tributaries include Cache Creek, Putah Creek, Willow Slough and the Knights Landing Ridge Cut.

In addition to these natural sources, an extensive network of sloughs, irrigation canals and drainage ditches are located within the county. The major slough and canal facilities include:

- **Tehama-Colusa Canal** – transports water south from Tehama County into Yolo County, terminating near Dunnigan.
- **Colusa Basin Drain** – flows from the Tehama-Colusa Canal and Dunnigan Hills to the Knights Landing outfall that discharges to the Sacramento River.
- **Willow Slough** – minor watercourse that drains much of the area between Cache and Putah Creeks.
- **Winters Canal** – primary source of irrigation for most of the County between Cache and Putah Creeks.
- **West Adams Canal** – carries water from Cache Creek north to the Hungry Hollow and the Yolo-Zamora areas.

Yolo County has no natural lakes. However, as a result of aggregate mining and reclamation activity along Cache Creek, several reclaimed lakes will be created and eventually become a part of the future planned Cache Creek Parkway. The Cache Creek Area Plan contains policies and regulations addressing the management of these future resources.

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ii. Water Quality

The Yolo County Flood Control and Water Conservation District performs studies on the physical and chemical characteristics of Cache Creek. Chemicals such as boron, diazinon, mercury and unknown toxics are agricultural pollutants found in Yolo County waterways. Studies on the physical and chemical characteristics of the Sacramento River and its tributaries within Yolo County have found high concentrations of nutrients and contaminants, particularly after major storms. In addition to agricultural pollutants, high concentrations of nutrients and chemicals are thought to originate from abandoned mines.

Comment [t3]: Boron and Hg are not considered agricultural pollutants.

Comment [t4]: Nutrients are not considered a mine drainage problem in our area.

Comment [t5]: This is an excellent reference, but is more than 10 years old and describes the entire Sacramento River Basin. It should not be considered a primary reference for Yolo County water quality.

The Central Valley Regional Water Quality Control Board (CVRWQCB) has adopted Total Maximum Daily Loads (TMDLs) for mercury in Cache Creek. A separate TMDL is currently under review for mercury in the Sacramento-San Joaquin Delta. The CVRWQCB has also adopted TMDLs for diazinon in the Sacramento River and the Delta.

⁷ United States Geological Survey, *Sacramento River Basin Nation Water-Quality Assessment Program*, http://ca.water.usgs.gov/sac_nawqa/index.html, accessed July 9, 2008.

iii. Groundwater

Yolo County has an extensive system of shallow and deep aquifers on which the county depends for domestic water supply. Wells in Yolo County are increasingly tapping deeper aquifers due to issues of subsidence and contamination, which are discussed below.

Comment [TOH6]: The main reference for groundwater in Yolo County is the "Groundwater Monitoring Program, Data Management System, and Update of Groundwater Conditions in the Yolo County Area", July 2004, YCFCWCD, Lufthoff & Scalmani.

The County has six groundwater sub-basins, which are shown in Figure CO-7. The East Yolo sub-basin, which covers the eastern portion of the county from south of Dunnigan to Davis, provides the greatest supply of residential water extraction. The other five sub-basins are the Capay Valley, Buckeye Creek, Dunnigan Hills, West Yolo and Sacramento River sub-basins.

Recharge of aquifers typically occurs along the streambeds of creeks and canals. Recharge occurs naturally, and also through reservoir releases, such as the release of stored water from the Indian Valley Reservoir into Cache Creek during low flows periods. The Indian Valley Reservoir was built by Yolo County residents so that farmers could use surface water rather than pump groundwater, to reduce overdraft and subsidence.

Comment [T7]: Although this statement is true, 80% of the recharge within the District comes from applied irrigation water and direct rainfall. For comparison, Cache Creek amounts to about 8% of the total recharge on average (YCFCWCD WMP 2000).

Several issues face the county in its use of groundwater. Subsidence can cause permanent loss of aquifer capacity when upper soil layers collapse. Subsidence can also compromise wells, irrigation canals, levees and highways. The Yolo Subsidence Monitoring Project (YSMP) is a collaborative effort between the County, the Cities of Woodland and Davis, UC Davis, the U.S. Bureau of Reclamation, the Army Corps of Engineers, and the California Department of Water Resources. The YSMP includes 47 stations that are monitored to determine where subsidence may be occurring and to what extent. As a result of their work, it appears that land subsidence due to overdraft of the shallow aquifer is a significant concern in the East Yolo sub-basin and, to a lesser degree, throughout other parts of the county. The greatest amount of subsidence, approximately 4 feet, has occurred east of Zamora, where irrigation needs are supplied exclusively from groundwater because no surface water sources exist.

Comment [t8]: Include time period.

In addition to subsidence, contamination of groundwater is also an issue in parts of the County. Coliform, nitrates and dissolved salts are primary concerns. Coliform and nitrates are a consequence of failing, underperforming and/or over-concentration of septic systems, such as in Dunnigan, North Davis Meadows, Madison and rural areas around the County. Nitrate contamination is also associated with over-fertilization of agricultural crops, golf courses, parks, and landscaping, and may be associated with cemeteries, feed lots, and agricultural disposal areas. Dissolved salts are produced from evaporation of irrigation water and evapotranspiration of soil moisture and shallow groundwater. These salts can accumulate, resulting in groundwater contamination. Arsenic and other soil minerals are naturally occurring contaminants that leach into streams, such as along Cache Creek and particularly in the Wild Wings County Service Area. Although groundwater supplies in the county generally meet current drinking water standards,

Figure CO-7 Groundwater Basins and Infiltration Rates

[figure needs to be reduced]

continued groundwater contamination may become problematic for municipal, industrial and agricultural uses.

Figure CO-7 also identifies all rivers, creeks, streams, and other areas where groundwater recharge occurs, based on degree of infiltration.

iv. Reclaimed Water

Reclaimed water from wastewater treatment facilities is used in Yolo County. Cache Creek Casino Resort and the Wild Wings County Service Area use treated tertiary wastewater for golf course irrigation. Other uses of reclaimed water include irrigation of agricultural fields and landscaping. The State regulates specific uses of reclaimed water. The level of prior treatment determines how the reclaimed water can be used. Tertiary treatment is generally required for human contact, as on golf courses and ornamental landscaping, or human consumption as on food crops. Secondary treatment may be adequate for other uses, such as fodder crops.⁸

The Regional Water Quality Control Board (RWQCB) also restricts discharge of reclaimed water to land. Where land discharge is allowed, it is regulated in order to protect groundwater resources. Nitrate removal is required in many cases where the reclaimed water will percolate to groundwater basins that are used for domestic water supply, although secondary treatment may be sufficient depending on soil conditions.⁹

b. Water Planning and Regulation

To ensure high quality and adequate supply, water resources in Yolo County are regulated by federal and State laws, as well as local water management plans. In 2007, the County adopted the Integrated Regional Water Management Plan (IRWMP). The IRWMP was developed by the Water Resources Association of Yolo County (WRA), in conjunction with the California Department of Water Resources (DWR). The IRWMP serves as an update to the County's 1992 water management plan, addressing major topics such as water supply, water quality, flood management, enhancement of aquatic and riparian habitat, and improvement of the County's recreational opportunities.

Besides the IRWMP, the County implements a number of planning documents to protect its water resources. The Yolo County Natural Heritage Program, previously mentioned in the Biological Resources section of this element, also serves as a water management plan with respect to wetlands and riparian corridors, in compliance with the Federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA). The Yolo County NHP does not, however, address aquatic species or their habitat. This plan is currently being updated by the Yolo county Habitat Joint Powers Authority and is expected to be published in 2009.

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Comment [19]: As is noted in the general comments, the IRWMP should be considered as THE water planning guidance document. At a minimum this text should include references to the almost 200 actions that are included in the IRWMP, the integration process, the regional nature of planning, the prioritization process work, and the implementation plan.

Comment [10]: Of particular importance are the Groundwater Management plans that have been adopted by various entities. We can help the author develop a complete list if requested.

⁸ California Code of Regulations, Title 22, Division 4, Chapter 3, Article 3.
⁹ California Code of Regulations, Title 22, Division 4, Chapter 3, Article 3.

The Cache Creek Area Plan protects water supply and aquatic habitat from contamination associated with mining. This plan, last updated in 2002, focuses on regulating off channel aggregate mining, improving channel stability, reducing erosion, maintaining flood capacity and restoring habitats.

The Yolo County Stormwater Management Program (SWMP) was developed by the Yolo County Planning and Public Works Department in conjunction with other Yolo County agencies. The SWMP analyzes various activities in urbanized areas that are sources of pollutants in stormwater and identifies Best Management Practices to reduce their levels. The SWMP responds to the issues and regulations of the 1987 Clean Water Act.

c. Domestic Water

Most of Yolo County's domestic water supplies originate from groundwater. West Sacramento is the only urban area that currently relies on surface water rather than groundwater as its primary source of water supply. The cities of Woodland and Davis, as well as UC Davis, are working on a joint proposal to obtain municipal water from surface supplies in the Sacramento River. Although the most common problem associated with groundwater in municipal supplies is the hardness (mineralization), contamination of the aquifer with coliform, nitrates, naturally occurring arsenic, and fuel from leaking underground storage tanks can be a serious issue in some parts of the County.

Table CO-6 shows current conditions with regards to domestic water systems in the unincorporated areas of the county. In addition, the Rio Villa public housing in Winters and the Davis Migrant Center both have private water systems. The rest of the county relies on private on-site wells. Yolo County has also has six major water districts that focus primarily on the delivery of irrigation water for agricultural purposes, although there has been discussion about one or more of the districts providing municipal water. The water districts are: Dunnigan Water District, Yolo-Zamora Water District, Yolo County Flood Control and Water Conservation District, North Delta Water Agency, Colusa Dain Mutual Water Company, and Colusa County Water District. Water agency boundaries are shown in Figure CO-8.

Comment [t11]: Table CO-6 contains good information, although it also includes incorporated cities.

Comment [t12]: Notably absent are RD 108 and RD 2035. It is not clear why these agricultural districts are included in this Domestic Water section.

County regulations, contained in Title 7, Chapter 1, Section 7-1.04 of the Yolo County Code, require fire sprinkler systems in all new residential development and new non-residential buildings over 5,000 square feet or over three stories in height. Because most existing water systems in Yolo County do not operate at pressures sufficient to maintain a fire sprinkler system for commercial structures, every unincorporated community in the county needs to upgrade its water system to meet these requirements.

Comment [t13]: Should this statement become an "Action"?

Other water supply and quality issues that Yolo County must address include increasingly stringent water quality regulations, availability of adequate water supplies during severe drought conditions, subsidence problems as a result of groundwater overdraft, rising costs of providing water services, and increasingly complex and expensive regulatory compliance. Many of these issues have been addressed through the Integrated

TABLE CO-6 WATER SYSTEM CONDITIONS BY UNINCORPORATED AREA

Unincorporated Area(s)	Water System Conditions
Clarksburg	No community water system. Individual wells.
Dunnigan	No community water system. Private water systems serve the two mobile home parks. The Dunnigan Water District provides supplement non-potable fire flow for some customers. Nitrates have been a problem in the past with some wells in the community.
Esparto	Community water system based on groundwater, which is managed by a Community Services District. Water pressure has been a recent concern, especially regarding commercial fire flow.
Knights Landing	Community water system based on groundwater, which is managed by a Community Services District. Water pressure has been a recent concern, especially regarding commercial fire flow.
Madison	Community water system based on groundwater, which is managed by a Community Service District. New well recently installed to address previous problems with coliform and nitrate contamination. Water pressure has been a recent concern, especially regarding commercial fire flow.
Monument Hills	Wild Wings development has a community water system based on groundwater, which is managed by a County Service Area. Arsenic is a potential problem. The remainder of the Monument Hills area relies on individual wells.
West Kentucky	Private water system based on groundwater. System improvements needed.
Willowbank, El Macero, North Davis Meadows, Royal Oaks	Willowbank, El Macero, and North Davis Meadows all have separate water systems managed by County Service Areas, which have been integrated with the City of Davis community water system. Royal Oaks is also served by the City of Davis. Nitrates have been a problem in North Davis Meadows.
Yolo	Community water system based on groundwater, which is managed by a Community Service District. Water pressure has been a recent concern, especially regarding commercial fire flow.
Zamora, Binning Farms, Patwin Road, West Plainfield, Willow Oak	No community water system. Individual wells.
Davis	Community water system based on groundwater. Davis is working with Woodland and UC Davis to acquire surface water from the Sacramento River. Hardness of the water is an ongoing issue.
West Sacramento	Community water system based on surface water from the Sacramento River. Hardness of the water is an ongoing issue.
Winters	Community water system based on groundwater.
Woodland	Community water system based on groundwater. Woodland is working with Davis and UC Davis to acquire surface water from the Sacramento River. Hardness of the water is an ongoing issue.

Comment [t14]: North Davis Meadows is a separate water system managed under contract by the City of Davis for the County. It is not physically connected to the City's water system. Only Willow Bank, El Macero, and Royal Oaks should be considered as part of the City's system.

Comment [t15]: This is a city.

Comment [t16]: This is a city.

Comment [t17]: Water hardness problems are likely small since the City is now on surface water.

Comment [t18]: This is a city.

Comment [t19]: This is a city.

Figure CO-8 *Water Agency Boundaries*

Comment [C20]: Map needs to be revised.

Regional Water Management Plan (RWMP) prepared by the Water Resources Association, a multi-agency effort to coordinate water policies among the various jurisdictions of Yolo County. Currently, the County is also considering additional ordinances and/or the formation of a countywide water agency to provide enhanced groundwater resource management.

Comment [t21]: This should be the "Integrated Regional Water Management Plan (IRWMP)".
 Deleted: Water Resources
 Deleted: I
 Deleted: W
 Deleted: RWMP

2. Policy Framework

GOAL CO-5 Water Resources. Ensure an abundant, safe, and sustainable water supply to support the needs of existing and future generations.

- Policy CO-5.1 Integrate the "Integrated Regional Water Management Plan" developed through the Water Resources Association of Yolo County to manage, protect and enhance the water resources of the County and the Region into the General Plan as appropriate.
- Policy CO-5.2 Develop a generalized water balance for the county that uses updated hydrologic and topographic information to describe where water comes from and how it flows through the county, including recharge and extraction of ground waters.
- Policy CO-5.3 Connect storm-water and flood management programs to watershed assessments to ensure that management efforts are consistent with local watershed hydrologic features and natural resource needs.
- Policy CO-5.4 Coordinate with water purveyors and water users to manage supplies to avoid long-term overdraft, water quality degradation, land subsidence and other potential problems. (f)
- Policy CO-5.5 Encourage the development of AB 3030 groundwater management plans over all regions of the County.
- Policy CO-5.6 Support projects that provide reliable and sustainable surface water, from a variety of energy efficient sources. Sources should be sufficient to serve existing and planned land uses in prolonged drought periods and protect natural resources and surface water flows. (f)
- Policy CO-5.7 Strive to manage the County's groundwater resources on a sustainable yield basis that can provide water purveyors and individual users with reliable, high quality groundwater to serve existing and planned land uses during prolonged drought periods. (f)
- Policy CO-5.8 Support educational programs to educate the public about practices and programs to minimize water pollution and reduce water usage. (f)

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 Comment [t22]: This policy could be expanded to list the five major resource categories as well as the major features of the plan (such as action development, integration, implementation, and in particular foundational actions. Note: if you take this suggestion, many of the following policies and actions become redundant.

Comment [t23]: This is redundant with 5.1 and should be deleted.

Deleted: In cooperation with interested parties, develop a drought management strategy that includes thresholds for limiting groundwater extraction when ground water levels reach critical elevations.

Comment [t24]: This is duplicative with 5.5 and should be deleted.

- Policy CO-5.9 Integrate water conservation and water quality protection into all aspects of the planning and development process. (S)
- Policy CO-5.10 Improve and protect water quality for municipal, agricultural, and environmental uses.
- Policy CO-5.11 Support mercury regulations that are based on good science and reflect an appropriate balancing of sometimes competing public values including health, food chain, reclamation and restoration of Cache Creek, sustainable and economically viable Delta agriculture, necessary mineral extraction, flood control, erosion control, water quality, and habitat restoration.
- Policy CO-5.12 Support efforts to reduce the accumulation of methyl mercury in fish tissue in Cache Creek and the Delta, as well as the consumption of fish with high levels of methyl mercury.
- Policy CO-5.13 Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable, properly adopted water policies of the Land Use and Resource Management Plan of the Delta Protection Commission.
- Policy CO-5.14 Encourage water purveyors to develop plans for responding to droughts and the effects of global climate change, including contingency plans, the sharing of water resources to improve overall water supply reliability, and the allocation of water supply to priority users. (S)
- Policy CO-5.15 Facilitate and encourage the development of new reliable future sources of supply consistent with local land use plans and regional water needs, including the completion of the Tehama-Colusa Canal.
- Policy CO-5.16 Support the integrated management of surface and groundwater, stormwater treatment and use, the development of highly treated wastewater, and desalinization where feasible.
- Policy CO-5.17 Ensure that regional, State, and federal water projects protect local water rights and areas of origin.
- Policy CO-5.18 Require proposals to convert land within or near areas identified as having a moderate to very high recharge capability to uses other than agriculture, open space, or habitat to demonstrate that groundwater recharge will not be significantly diminished.
- Policy CO-5.19 Encourage new development and redevelopment to use reclaimed wastewater, where feasible, to augment water supplies and to conserve potable water for domestic purposes. (S)

Comment [125]: Combine 5.11 and 5.12 into one policy.

Comment [126]: 5.15 and 5.16 can be combined with 5.4

- Policy CO-5.20 Require significant discretionary projects to demonstrate adequate long-term and sustainable water supplies by preparing a verified water supply assessment. The assessment shall demonstrate a long-term, reliable water supply satisfactory under normal and above normal rainfall conditions, as well as drought conditions. (E)
- Policy CO-5.21 Require new development to be designed such that nitrates, lawn chemicals, oil, and other pollutants of concern do not impair groundwater quality.
- Policy CO-5.22 Encourage developers to build new homes to higher water-efficiency standards than already required. (E)
- Policy CO-5.23 Strive for "water-neutral" development with new water demand offset by efficiency improvements elsewhere in the system. Require all new developments to offset new water demands to the greatest extent feasible. (E)
- Policy CO-5.24 Encourage water purveyors to adopt conservation pricing strategies for existing and new development.
- Policy CO-5.25 Encourage the use of water management strategies, biological remediation, and technology to address naturally occurring water quality problems such as boron, mercury, and arsenic.
- Policy CO-5.26 Work with other agencies and non-profit organizations to provide educational and technical assistance programs such as the irrigated lands program to encourage farmers to adopt agricultural methods that improve water quality.
- Policy CO-5.27 Support efforts to meet applicable water quality standards for all surface and groundwater resources.
- Policy CO-5.28 Support efforts to maintain and modernize existing water delivery infrastructure.
- Policy CO-5.29 Support the development of regional coordination and cooperation.

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3. Implementation Program

- Action CO-A62 Ensure collection of data from public water suppliers and other water users which use groundwater sources to monitor and report groundwater levels and yields, where appropriate, to manage long term aquifer conditions. (Policy CO-5.1, Policy CO-5.3)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

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Comment [127]: This is an existing program being managed by the District in coordination with many agencies.

Action CO-A63 Work cooperatively with water purveyors and with other land use planning agencies to share data on water supply availability, anticipated demand, land use, and population projections. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A64 Develop a website so that water purveyors and land use planning agencies have access to adopted urban water management plans and General Plans. (Policy CO-5.1)
Responsibility: Parks and Resources Department, Planning and Public Works Department
Timeframe: 2010/2011

Comment [MSOffice28]: This site already exists at <http://www.ywua.water.ca.gov/urbanplanning/wmp/wmp.cfm>. It is maintained by DWR and we should not duplicate these efforts.

Action CO-A65 Create a central database for all jurisdictions within the County of proposed, pending, and approved development activity to be used in cumulative analyses and water supply assessments. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action CO-A66 Work with water purveyors in the County to plan for possible changes to water supply and quality resulting from global warming. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3, Policy CO-5.10) (S)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A67 Participate in regional planning efforts regarding surface water resources, including the Sacramento River, Cache Creek, Putah Creek, Tehama-Colusa Canal, Yolo Bypass, and Sacramento-San Joaquin Delta. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A68 Update and implement the Integrated Regional Water Management Plan. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3)
Responsibility: Parks and Resources Department
Timeframe: 2010/2011

Comment [t29]: This should be the number one action. The IRWMP is updated and implemented on an ongoing basis.

Action CO-A69 Oppose proposals for surface or groundwater exports to locations outside Yolo County that do not preserve both water quality and water supply for current and planned water users, including the environment. (Policy CO-5.2, Policy CO-5.3)

Responsibility: Parks and Resources Department, County Administrator's Office
 Timeframe: Ongoing

Action CO-A70 Coordinate with local water purveyors to develop a conjunctive use program, consistent with the Integrated Regional Water Management Plan, to make the most efficient use of surface and groundwaters. (Policy CO-5.1, Policy CO-5.3) (S)
 Responsibility: Parks and Resources Department
 Timeframe: 2010/2011

Action CO-A71 ~~Ensure collection and maintenance of data on water use, water supplies, and water quality to avoid long-term overdraft, water quality degradation, land subsidence and other potential groundwater problems. (Policy CO-5.5, Policy CO-5.6)~~
 Responsibility: ~~Health Department, Parks and Resources Department~~
 Timeframe: ~~Ongoing~~

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Comment [t30]: Can be combined with CO-A62 and CO-A72 into a single action.

Action CO-A72 ~~Map operational and non-operational wells into the County's Geographic Information System. (Policy CO-5.3, Policy CO-5.5, Policy CO-5.6, Policy CO-5.7, Policy CO-5.8)~~
 Responsibility: ~~Health Department, Information Technology Department~~
 Timeframe: ~~2010/2011~~

Comment [t31]: See comment t29 above.

Action CO-A73 ~~Encourage local water purveyors to develop and implement urban and agricultural water management plans. (Policy CO-5.1, Policy CO-5.5) (S)~~
 Responsibility: ~~Parks and Resources Department~~
 Timeframe: ~~2011/2012~~

~~Deleted: Work with~~

~~Deleted:~~

Comment [t32]: Many of these are already adopted. Specific efficiency gains are inappropriate considering the "closed system" we operate in the District's jurisdiction.

~~Deleted: use efficiency programs to provide a 20 percent improvement in water use efficiency throughout the county by 2030~~

~~Deleted:~~

Comment [t33]: Delete. This action is the same as CO-A70.

Action CO-A74 ~~Work with public and private water purveyors to substitute surface water sources for groundwater in areas where groundwater use is not sustainable (either for supply or quality reasons), where this can be done economically, and without environmental damage. (Policy CO-5.1, Policy CO-5.3)~~
 Responsibility: ~~Parks and Resources Department~~
 Timeframe: ~~Ongoing~~

Action CO-A75 ~~Develop and implement an integrated well-head protection program. (Policy CO-5.6)~~
 Responsibility: ~~Agriculture Department, Health Department~~
 Timeframe: ~~2009/2010~~

Comment [t34]: Is this the same as a well abandonment program? If it is not, then a well abandonment program should be included and given a high priority.

Action CO-A76 Develop a County grading ordinance. (Policy CO-5.5, Policy CO-5.6) (S)
Responsibility: Planning and Public Works Department
Timeframe: 2009/2010

Action CO-A77 Adopt a Water Efficient Landscape Ordinance to require greater use of regionally native drought-tolerant vegetation, limitations on the amount of turf in residential development, computer controlled irrigation systems, and other measures as appropriate. (Policy CO-5.2, Policy CO-5.3, Policy CO-5.4) (S)
Responsibility: Planning and Public Works Department
Timeframe: 2011/2012

Action CO-A78 ~~Review the groundwater management ordinance to address the cumulative impacts of incremental groundwater extraction.~~ (Policy CO-5.3)
Responsibility: County Counsel
Timeframe: 2009/2010

~~Deleted: Develop and adopt a~~

Action CO-A79 Work with local agencies and non-profit organizations to provide educational and technical assistance to farmers to reduce sedimentation, provide on-site retention of irrigation water and flow attenuation, as well as detention of stormwater flows. (Policy CO-5.4)
Responsibility: Agriculture Department
Timeframe: Ongoing

Action CO-A80 Coordinate with water purveyors in the unincorporated areas to inform the public about practices and programs to minimize water pollution. (Policy CO-5.4)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

Action CO-A81 Create educational programs to inform agencies, stakeholders, and the public about groundwater Best Management Practices for efficient water use, water conservation, and recharge. (Policy CO-5.4) (S)
Responsibility: Parks and Resources Department
Timeframe: 2011/2012

Action CO-A82 ~~Adopt an ordinance requiring that existing homes be retrofitted with water efficient appliances and fixtures prior to sale.~~ (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3, Policy CO-5.5) (S)
Responsibility: Planning and Public Works Department
Timeframe: 2011/2012

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Action CO-A83 Establish the cost of operating and maintaining potable water treatment and distribution disposal systems/facilities to ensure they are

borne by those receiving benefit, through the establishment of an appropriate maintenance entity and fees. (Policy CO-5.2, Policy CO-5.3, Policy CO-5.5)

Responsibility: Planning and Public Works Department, LAFCO
Timeframe: Ongoing

- Action CO-A84 Adopt an ordinance to allow for shared water systems to facilitate the clustering of homes and preservation of agricultural land, where an entity is established to provide maintenance or financing for maintenance of the water system. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3) (S)
- Responsibility: Health Department
Timeframe: 2009/2010
- Action CO-A85 Adopt an ordinance to allow for roof catchment and use of rainwater for non-potable uses to reduce the need for groundwater. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3, Policy CO-5.4) (S)
- Responsibility: Parks and Resources Department, Planning and Public Works Department
Timeframe: 2010/2011
- Action CO-A86 Adopt design mandates to reduce or eliminate impervious surfaces where possible. (Policy CO-5.6)
- Responsibility: Planning and Public Works Department
Timeframe: 2010/2011
- Action CO-A87 Support water purveyors in the implementation and continued refining of the "Memorandum of Understanding (MOU) Regarding Urban Water Conservation in California" in those areas where water suppliers are party to the MOU. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3)
- Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A88 Implement and regularly update the County Stormwater Management Plan and associated programs. (Policy CO-5.5, Policy CO-5.6)
- Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A89 Require the implementation of Best Management Practices (BMPs) to minimize erosion, sedimentation, and water quality degradation resulting from new development and increases in impervious surfaces. (Policy CO-5.5, Policy CO-5.6) (S)
- Responsibility: Planning and Public Works Department
Timeframe: Ongoing

- Action CO-A90 Adopt design standards that use low-impact development techniques that emulate the natural hydrologic regime and reduce the amount of runoff and associated pollutants. Examples include vegetated swales, landscaped detention basins, permeable paving, and green roofs. (Policy CO-5.5, Policy CO-5.6) (S)
Responsibility: Planning and Public Works Department
Timeframe: 2012/2013
- Action CO-A91 Work with the Central Valley Regional Water Quality Control Board and other State and federal agencies to implement mercury total maximum daily loads (TMDLs) for Cache Creek and to develop mercury TMDLs for the Delta and other Yolo County waterways where appropriate. (Policy CO-5.6, Policy CO-5.7)
Responsibility: Parks and Resources Department
Timeframe: Ongoing
- Action CO-A92 Evaluate the creation of a countywide water authority or other governance structure to address water conservation, flood control, water conveyance, and water exports. (Policy CO-5.1, Policy CO-5.2, Policy CO-5.3)
Responsibility: County Administrator's Office, County Counsel
Timeframe: 2009/2010
- Action CO-A93 Continue to monitor water quality in Lower Cache Creek and annually make the resulting data publicly available. (Policy CO-5.6)
Responsibility: Parks and Resources Department
Timeframe: Ongoing

H. Air Quality

1. Background Information

a. Air Basin and Meteorology

Yolo County is located in the Sacramento Valley Air Basin (SVAB), which also includes Sacramento, Shasta, Tehama, Butte, Glenn, Colusa, Sutter, Yuba and parts of Solano and Placer Counties. The SVAB is bounded by the Coast Ranges to the west, the Cascade Range to the north and the Sierra Nevada to the east. These mountain ranges channel wind through the Valley, but also limit dispersion of pollutant emissions from the Valley.

The SVAB is characterized by hot, dry summers and cool, rainy winters, with periods of dense and persistent low-level fog interspersed with the North Pacific storm track. The average summer daily temperatures for the Sacramento Valley air basin range from 50 to more than 90 degrees Fahrenheit. The winter average temperature is approximately

50 degrees Fahrenheit with winter low temperatures occasionally dropping below freezing.

The SVAB is subject to unique wind patterns, which can affect air quality by transporting pollutants. The ozone season in the SVAB, which occurs between May and October, is characterized by still air or light winds in the morning and an evening breeze that typically transports airborne pollutants out of the air basin. However, during part of the summer, wind patterns circle airborne pollutants back into the SVAB in a phenomenon referred to as an "inversion layer." This phenomenon worsens the pollutant emission concentrations and contributes to violations of the air quality standards.

b. Air Quality Monitoring, Emissions and Significant Source Categories
The Federal Clean Air Act (FCAA) governs air quality in the United States. In addition to being subject to federal requirements, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA).

At the federal level, the United States Environmental Protection Agency (U.S. EPA) administers the CAA. The CCAA is administered by the California Air Resources Board (ARB) at the State level and by the various air quality management districts at the regional levels. The Yolo-Solano Air Quality Management District (District) regulates air quality locally. The District's jurisdiction is the western portion of Lower Sacramento Valley Air Basin, comprised of Yolo County and the Northeast portion of Solano County.

The 1970 FCAA authorized the establishment of national health-based air quality standards and also set deadlines for their attainment. The FCAA Amendments of 1990 changed deadlines for attaining national standards as well as the remedial actions required of areas of the nation that exceed the standards. Under the CAA, State and local agencies in areas that exceed the national standards are required to develop State Implementation Plans (SIPs) to demonstrate how they will achieve the national standards by specified dates. SIPs are not single documents, but rather are a compilation of new and previously submitted plans, programs, district rules, State regulations and federal controls. ARB reviews and approves the SIP, then provides the SIP to EPA for approval and publication. The CAA requires that projects receiving federal funds demonstrate conformity to the approved SIP and local air quality attainment plan for the region. Conformity with the SIP requirements also satisfies the CAA requirements.

In 1988, the CCAA required that all air districts in the State endeavor to achieve and maintain California Ambient Air Quality Standards for carbon monoxide (CO), ozone (O₃), sulfur dioxide (SO₂) and nitrogen dioxide (NO₂) by the earliest practical date. The CCAA provides districts with authority to regulate indirect sources and mandates that air quality districts focus particular attention on reducing emissions from transportation and area-wide emission sources (Health and Safety Code Section 40716). Each district plan is to achieve a 5 percent annual reduction, averaged over consecutive three-year periods, in district-wide emissions of each nonattainment pollutant or its precursors (Health and Safety Code Section 40914).

Based on this framework, national and State ambient air quality standards have been established for six pollutants: ozone, CO, lead, nitrogen dioxide (NO₂), particulate matter less than or equal to 10 or 2.5 microns in diameter (PM₁₀ and PM_{2.5}), and sulfur dioxide (SO₂). Ambient air quality standards are designed to protect public health and welfare with a reasonable margin of safety. Because individuals vary widely in their sensitivity to air pollutants, standards are designed to protect more sensitive populations such as children and the elderly. Generally, California Ambient Air Quality Standards are more stringent than national standards.

Areas of California not meeting federal or State air quality standards are classified as nonattainment areas. Yolo County is designated as a nonattainment area for both the State and federal ozone standards and for the State inhalable particulate matter (PM₁₀) standards.

c. **Applicable State and Federal Air Quality Plans and Transportation Plans**
The CCAA requires areas that have not attained State ambient air quality standards to prepare plans to attain these standards by the earliest practicable date. The District is designated as nonattainment for ozone, and accordingly, the 1992 Air Quality Attainment Plan (AQAP) was developed pursuant to CCAA requirements to provide progress toward attaining the State ozone standard. The District's Board of Directors adopted the AQAP on February 19, 1992, and it was approved by ARB on May 28, 1992.

State law does not require attainment plans for State particulate matter standards. State law does require annual and triennial progress reports regarding implementation of control measures, and triennial plan revisions to reflect and respond to changing circumstances.

The FCAA required a non-attainment plan (i.e. SIP) in 1994. The 1994 State Implementation Plan (SIP) superseded the 1992 AQAP. The SIP was deemed by ARB to fulfill the requirements for the first Triennial Progress Report to the AQAP. Additional Triennial Progress Reports were completed in 1997, 2000, and 2003.

In addition to these federal and State air quality plans, the District developed the Transportation and Land Use Toolkit in 2003, in partnership with several regional transportation agencies. The Toolkit discusses projects for alternative transportation modes that may mitigate and reduce emissions. SACOG has also created a Preferred Blueprint Scenario, approved in 2003, which outlines a vision of growth that promotes compact land use patterns which would contribute to reduced vehicular emissions.

2. Policy Framework

GOAL CO-6	<u>Air Quality.</u> Improve air quality to reduce the health impacts caused by harmful emissions.
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- Policy CO-6.1 Improve air quality through land use planning decisions. (S)
- Policy CO-6.2 Support local and regional air quality improvement efforts. (S)
- Policy CO-6.3 Encourage employers to increase telecommuting, provide bicycle facilities, and enhance access to public transit for employees. (S)
- Policy CO-6.4 Engage the public in efforts to increase awareness of the health risks associated with air pollution and to take voluntary actions that reduce emissions. (S)
- Policy CO-6.5 Encourage community participation in air quality planning.

3. Implementation Program

- Action CO-A94 Implement the guidelines of the Transportation and Land Use Toolkit, developed by the Yolo-Solano Air Quality Management District (YSAQMD). (Policy CO-6.1, Policy CO-6.2) (S)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A95 Require development proposals that introduce sources of toxic air pollutants to prepare a health risk assessment and, based on the results of the assessment, establish appropriate land use buffer zones around those uses posing substantial health risks. (Policy CO-6.1) (S)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A96 For discretionary permits, require agricultural Best Management Practices for advantageous projects regarding odor control, stormwater drainage, and fugitive dust control where appropriate. (Policy CO-6.1) (S)
Responsibility: Agriculture Department
Timeframe: Ongoing
- Action CO-A97 Implement the regulations and programs established by the YSAQMD to bring local air quality into attainment with State and federal standards. (Policy CO-6.1, Policy CO-6.2) (S)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A98 Coordinate air quality planning efforts with other local, regional and State agencies. (Policy CO-6.1, Policy CO-6.2) (S)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action CO-A99 Regulate the location and operation of land uses to avoid or mitigate harmful or nuisance levels of air emissions to the following sensitive receptors: residential uses, hospitals and nursing/convalescent homes, hotels and lodging, schools and day care centers, and appropriate habitat areas. (Policy CO-6.1, Policy CO-6.2)
 Responsibility: Planning and Public Works Department
 Timeframe: Ongoing

I. Energy Conservation

The following discussion includes goals, policies and actions relating to energy production, usage and conservation within Yolo County. Other policies relating to energy conservation, particularly associated with green building, are also located in the Land Use and Community Character Element of this General Plan.

1. Background Information

Title 24, Part 6 of the California Code of Regulations sets forth the State energy efficiency standards for residential and non-residential buildings. Title 24 requirements address a wide range of design and energy performance features of development, including insulation; the use of energy-efficient heating, ventilation and air conditioning equipment; solar reflective roofing materials; and energy-efficient indoor and outdoor lighting systems.

Energy conservation has numerous benefits besides economic and financial savings for individual consumers. The combustion of fossil fuels to produce heat or electricity, or to power internal combustion engines, has been linked to poor air quality in the Sacramento Valley, global warming and negative impacts on crops. In Yolo County, energy conservation can be achieved via a reduction in electricity usage and private automobile use, encouraging efficient siting and exposure for buildings, and implementing land use and transportation policies that encourage fewer and shorter vehicle trips.

2. Policy Framework

GOAL CO-7	<u>Energy Conservation.</u> Promote energy efficiency and conservation.
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Policy CO-7.1 Encourage conservation of natural gas, oil and electricity, and management of peak loads in existing and planned land uses. (S)

Policy CO-7.2 Support efforts to improve energy efficiency in irrigation. (S)

- Policy CO-7.3 Require all projects to incorporate feasible energy-conserving design and construction techniques. (E)
- Policy CO-7.4 Require the use of Energy Star certified appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units, where feasible. (E)
- Policy CO-7.5 Promote criteria for all new parking lots to significantly increase shading to relieve the potential for "heat islands." (E)
- Policy CO-7.6 Encourage the use of building materials and methods that increase energy efficiency a minimum of 15 percent beyond State Title-24 standards for residential buildings and 20 percent beyond State Title 24 standards for commercial buildings. (E)
- Policy CO-7.7 Support farmers and landowners in their efforts to maximize the efficiency of agricultural end uses. (E)
- Policy CO-7.8 Increase energy efficiency and alternative energy utilization in existing buildings where feasible. (E)
- Policy CO-7.9 Require that new site and structure designs maximize energy efficiency. (E)
- Policy CO-7.10 Encourage residents to retrofit existing residences to maximize energy efficiency. (E)

3. Implementation Program

- Action CO-A100 Amend the Zoning Code to streamline permitting for the production of biofuels, biomass, and other energy alternatives to reduce dependency on fossil fuels. (Policy CO-7.1) (E)
Responsibility: Planning and Public Works Department
Timeframe: 2010/2011
- Action CO-A101 Require the use of Energy Star certified appliances, such as water heaters, swimming pool heaters, cooking equipment, refrigerators, furnaces and boiler units, in all new subdivisions. (Policy CO-7.1, Policy CO-7.4) (E)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A102 Continue to provide incentives for the installation of solar energy and other alternate conservation measures in all development approvals. (Policy CO-7.1, Policy CO-7.3, Policy CO-7.8) (E)

Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action CO-A103 Amend the Zoning Code to include regulations for all new parking lots to include tree plantings that will result in 50 percent shading of parking lot surface areas within 10 years. (Policy CO-7.1, Policy CO-7.5) (C)
Responsibility: Planning and Public Works Department
Timeframe: 2010/2011

Action CO-A104 Use Development Agreements and/or adopt an ordinance to require the use of building materials and methods that increase energy efficiency a minimum of 20 percent beyond State Title-24 standards, where feasible. (Policy CO-7.6) (C)
Responsibility: Planning and Public Works Department, County Counsel
Timeframe: Ongoing

J. Climate Change

A summary of the issue of climate change is provided in this subsection, however climate change policies also occur in every element of this General Plan and are denoted by the symbol "(C)".

1. Background Information

A balance of naturally occurring greenhouse gases (GHGs) in the earth's atmosphere is responsible for maintaining a habitable climate. Emissions from human activities, such as electrical production, motor vehicle use, and some forms of agriculture are elevating the concentrations of greenhouse gases in the atmosphere, and have led to increasing instability in the earth's climate. This is known as climate change. Carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ozone (O₃), and water vapor (H₂O) are the primary GHGs. When concentrations of these gases exceed natural concentrations in the atmosphere, the greenhouse effect is enhanced and global warming occurs.

California's major initiatives for reducing climate change or GHG emissions are outlined in Assembly Bill 32 (signed into law 2006), 2005 Executive Order and a 2004 California Air Resources Board (CARB) regulation to reduce passenger car GHG emissions. These efforts aim at reducing GHG emissions to 1990 levels by 2020 – a reduction of about 25 percent, and then an 80 percent reduction below 1990 levels by 2050. The CARB is tasked with implementation of these directives.

How California communities are designed and built has large consequences on the State's GHG emission levels, and as a result, has an impact on global climate change. The majority of the State's greenhouse gas (GHG) emissions are the result of infrastructure and development decisions: how we build our buildings, where we put

them, and the quality and types of infrastructure that are required to serve them. This General Plan addresses those issues for unincorporated Yolo County.

This General Plan establishes the land use pattern that will accommodate the residents, businesses, and attendant infrastructure planned through 2030 in Yolo County. Decisions about the location of commercial, residential and civic buildings, roads and transit systems, water supply, building design, natural resources, open space, agriculture, and energy infrastructure determine the level of GHG emissions in the County. Thus, through the implementation of this General Plan it is possible to minimize increases in local GHG emissions. Local decisions regarding agricultural land preservation, transportation, air quality, water supply, economic development, environmental protection, and affordable housing need to be coordinated and balanced to achieve the County's multiple policy objectives and still minimize GHG emissions.

Motor vehicle use creates a significant proportion of GHG emissions. There are three interrelated components that can contribute to transportation sector emission reductions: 1) vehicle technology, 2) fuels, and 3) vehicle use. Local government has the ability to affect only one area – vehicle use. Vehicle use is affected by providing transportation alternatives and by managing the demand for transportation.

Transportation demand management (TDM) and alternative mobility options, including walking, biking, and transit, require coordinated land use decisions and measures that maximize the efficient use of existing transportation systems and provide for the increased availability and use of efficient transit, as well as walking and biking infrastructure to increase mobility, improve health, and provide other economic and environmental benefits. The effectiveness of efforts to provide transportation alternatives to the automobile and to implement TDM policies and strategies can be measured in terms of reductions in vehicle miles traveled (VMT) or expected growth in VMT. VMT reductions (and speed stability) correlate directly with reductions in GHG emissions.

Land use patterns also have a direct relationship to GHG emissions. Studies have shown that the following land use characteristics lead to significantly higher average vehicle ownership, daily VMT per capita, annual traffic fatality rate, and maximum ozone level days.

- Population dispersed in low density residential development.
- A lack of mixed uses (homes, shops, and workplaces).
- A lack of distinct, thriving activity centers, such as strong downtowns or town centers.
- A network of roads marked by very large block size and poor access from one place to another.

Research of the many factors that can be used to analyze the relationship between development and transportation implies that density may have the most significant relationship to travel and transportation outcomes. Controlling for other factors, the difference between the length and amount of trips, low density U.S. metropolitan areas have over 40 percent more daily VMT per capita than high density areas. In general, a doubling of neighborhood density can be expected to result in approximately a 5 percent reduction in both the number of vehicle trips and their length.

Overall VMT and vehicle trips per household decline as accessibility, density, and land-use mixing increase, which have historically been tenets of land use planning in Yolo County, as in this General Plan.

Yolo County has undertaken several actions to date to reduce greenhouse gases as related to County operations and programs:

- **Cool Counties.** Yolo County has committed to the Cool Counties Climate Stabilization Declaration, a pledge to reduce greenhouse gas emissions from County operations by 80 percent by 2050.
- **UC Davis Partnership.** The County has engaged civil and environmental engineering students to assist in studying its carbon generation from county operations, and develop policies and strategies to reduce emissions.
- **Increasing Energy Efficiency.** The County has taken steps to increase the energy efficiency of county operations including replacement of incandescent lights with compact fluorescent bulbs, retrofit of infrastructure in County buildings, installation of computerized climate control in all major county buildings, installation of cogeneration capacity at the Monroe Detention Facility, development of a building closure program to retire less energy-efficient buildings, and a countywide appliance replacement program for Energy Star appliances.
- **Full-Scale Landfill Bioreactor.** The County recovers methane gas, a potent greenhouse gas, from the Central Landfill to generate electricity.
- **LEED.** The County has adopted Leadership in Energy and Environmental Design (LEED) standards for new county buildings.
- **Recycling.** All County buildings recycle paper, cardboard, cans, bottles, fluorescent tubes, oil, computers, rigid plastics, agricultural plastics, PVC pipe, toner cartridges, cell phones, batteries, and electronic waste.
- **Agricultural Marketing.** The Agriculture Commissioner has initiated an agricultural marketing program to reduce "food miles," and therefore result in reductions in carbon dioxide emissions.
- **Transportation and Fleet Vehicles.** The County has installed charging stations for electric vehicles and uses electric vehicles for commuting between local facilities.

The County also requires energy efficient project design and landscaping design as a part of the development review process. Additionally, the Cache Creek Area Plan es-

establishes monetary and regulatory incentives to encourage recycling of aggregate products.

2. Policy Framework

GOAL CO-8	Climate Change. Limit greenhouse gas emissions and plan for adaptation to the future consequences of global climate change.
Policy CO-8.1	Assess current greenhouse gas emission levels and adopt long-term strategies based on scientific analysis to reduce global climate change impacts. (E)
Policy CO-8.2	Use the development review process to achieve measurable reductions in greenhouse gas emissions. (E)
Policy CO-8.3	Prepare appropriate strategies to adapt to climate change based on sound scientific understanding of the potential impacts. (E)
Policy CO-8.4	Encourage all businesses to take the following actions, where feasible: replace high mileage fleet vehicles with hybrid and/or alternative fuel vehicles; increase the energy efficiency of facilities; transition toward the use of renewable energy instead of non-renewable energy sources; adopt purchasing practices that promote emissions reductions and reusable materials; and increase recycling. (E)
Policy CO-8.5	Promote GHG emission reductions by supporting carbon efficient farming methods (e.g. methane capture systems, no-till farming, crop rotation, cover cropping, residue farming); installation of renewable energy technologies; protection of grasslands, open space, and farmlands from conversion to other uses; and development of energy-efficient structures. (E)
Policy CO-8.6	Undertake an integrated and comprehensive approach to planning for climate change by collaborating with International, national, State and regional organizations. (E)
Policy CO-8.7	Integrate climate change planning and program implementation into County decision making. (E)
Policy CO-8.8	Increase public awareness about climate change and encourage county residents and businesses to become involved in activities and lifestyle changes that will aid in reduction of greenhouse gas emissions. (E)

3. Implementation Program

- Action CO-A105 Develop a Greenhouse Gas (GHG) Emissions Reduction Plan and/or climate action plan for the County, to address climate change and GHG reduction, including the following steps: 1) conduct a baseline analysis (GHG emissions inventory) for 1990 and 2005; 2) adopt an emissions reduction target; 3) develop a plan for reducing emissions including direct offsets and fees to purchase offsets; 4) implement strategies and actions; and 5) monitor emissions and verify results every five years starting in 2010. Utilize the 1982 Energy Plan as a starting point for this effort. (Policy CO-8.1) (C)
Responsibility: County Administrator's Office
Timeframe: 2012/2013
- Action CO-A106 Monitor State progress in the development of GHG quantification protocol and guidance for local governments that allows for statewide uniform measurement and estimation of expected jurisdiction-wide GHG emissions. (Policy CO-8.1) (C)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing
- Action CO-A107 Require the implementation of cost-effective and innovative emission reduction technologies in building components and design. (Policy CO-8.2, Policy CO-8.4) (C)
Responsibility: Planning and Public Works Department, General Services Department
Timeframe: Ongoing
- Action CO-A108 Adopt urban forestry practices that encourage forestation as a means of storing carbon dioxide, with the goal of doubling the tree canopy in unincorporated communities by 2030. (Policy CO-8.1) (C)
Responsibility: Planning and Public Works Department, Parks and Resources Department
Timeframe: 2012/2013
- Action CO-A109 Require new development to incorporate designs and/or programs to reduce travel demand and vehicle emissions. (Policy CO-8.2, Policy CO-8.4) (C)
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action CO-A110 Require that new development incorporate alternative modes of transportation, including transit, bicycling and walking, in order to reduce vehicle emissions. (Policy CO-8.2, Policy CO-8.4) ☑
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

K. Delta Region

The following discussion includes goals, policies and actions relating to the County's interests in the Delta region. Other policies relating to the Delta are also located in each of the other elements of this General Plan.

1. Background Information

In the past two years, the Delta has become an area of intense interest, with numerous planning and legislative efforts looking to redefine the policy and regulatory landscape. This General Plan will incorporate the timely results of these various state processes, where appropriate, once they are adopted. Other processes may be the subject of future Amendments to bring the General Plan into conformance with new laws and/or regulations.

Those areas of the Yolo Bypass, the City of West Sacramento, and the unincorporated area that lie south of Interstate 80 are located within the Primary and Secondary Zones of the Sacramento-San Joaquin Delta. Land use in these areas must not only be consistent with this General Plan, they must also be consistent with the Land Use and Resource Management Plan (LURMP), as adopted by the Delta Protection Commission (DPC). The DPC is currently in the process of updating the LURMP, to address a wide range of issues, including recent court decisions related to water export, studies that indicate serious problems with the health of the Delta ecosystem, concerns about the ability of levees to withstand significant flood and/or seismic events, and the effects of future global climate change. This review may include areas outside of the Delta as currently defined. The updated Draft LURMP is expected to be released in 2009.

Similarly, in 2006, the Governor issued an Executive Order creating the Delta Vision process. The Delta Vision Blue Ribbon Task Force (DVBRTF) is a group of public officials, experts, and stakeholders, charged with developing recommendations on the overall management and governance of the Delta, including goals related to improving safety, ensuring water supply and water quality, expanding recreation, coordinating emergency response, and protecting infrastructure and public safety. The DVBRTF is currently conducting their strategic planning process, which is expected to be completed by early 2009.

The Bay Delta Conservation Plan (BDCP) is a collaborative effort between Federal and State agencies, water districts, environmental organizations, and the California Farm Bureau to help recover endangered/sensitive species and their habitats in the Delta, while ensuring sufficient and reliable water supplies for Central and Southern Califor-

nia. Primary among their recommendations is the construction of a new facility to convey water from the North Delta to the South Delta. There are two potential alignments for an alternative conveyance: one going through Sacramento County and one through Yolo and Solano Counties. Extensive habitat restoration to mitigate for the plan is also under consideration, including the lower Yolo Bypass and the Clarksburg region. The BDCP is expected to be completed by 2010.

The Central Valley Regional Water Quality Control Board (CVRWQCB) is in the process of developing Total Maximum Daily Loads (TMDLs) for mercury. Both refined and elemental mercury are contaminants in the Delta, the result of natural deposits and the on-going effects of gold mining in the 18th century. Mercury becomes more concentrated as it is carried up the food chain, adversely affecting development in the young. It is of particular concern to the health of fish species and people who consume large amounts of Delta fish. The TMDLs will strictly regulate the amounts of mercury that can be discharged into the Delta and its tributaries.

The Lower Bypass Planning Forum provides a stakeholder process to assess a broad range of issues concerning the southerly portion of the Yolo Bypass. A State-funded planning process, it includes participation by the DPC, Yolo Basin Foundation, Metropolitan Water District, and Westlands Water District.

2. Policy Framework

GOAL CO-9	Delta Governance. Participate in State and regional efforts to establish governance, policy, and regulations for the Delta, to ensure the consideration of Yolo County's interests.
Policy CO-9.1	Advocate to establish funding mechanisms independent of the State budget for payment to the County of in-lieu property taxes and other fees on land acquired in the Delta for habitat restoration and water conveyance.
Policy CO-9.2	Ensure that the acquisition of new municipal water for the City of Davis, City of Woodland, and UC Davis from the Sacramento River is not precluded.
Policy CO-9.3	Pursue the establishment of dedicated State and federal funding sources to remediate mercury, in the various sources located in the upper Cache Creek watershed, in the sediments and waterways of both Cache Creek (including the Settling Basin) and the Yolo Bypass, and where it methylizes in the Delta.
Policy CO-9.4	Ensure that the design and construction of habitat restoration projects within riparian areas do not result in increased levels of mercury biomethylation within the Yolo Bypass and Delta are not increased.

- Policy CO-9.5 Encourage funding to maintain and strengthen flood capacity along the Sacramento River and Yolo Bypass, including support from beneficiaries of the State and Central Valley Water Projects, which have changed flow regimes to the detriment of levee integrity.
- Policy CO-9.6 Support efforts to provide a minimum 100-year flood protection for the community of Clarksburg.
- Policy CO-9.7 Protect water quality in the Sacramento River, its tributaries, and groundwater aquifers from excess salinity due to decreased fresh water inflow from Delta projects.
- Policy CO-9.8 Work to implement high priority projects in Yolo County's Integrated Regional Water Management Plan, especially related to flood management on Cache Creek.
- Policy CO-9.9 Ensure existing and future operations of the Port of Sacramento as an industrial and transport hub for the region, including protection and improvement of the levees along the deep water ship channel, as well as deepening the ship channel.
- Policy CO-9.10 Support improvements necessary to ensure the continued transportation of agricultural products along State Route 84 for the Clarksburg region.
- Policy CO-9.11 Ensure that proposed changes to the operation of the Sacramento Weir fully mitigate any potential adverse impacts to Old River Road (County Road 22).
- Policy CO-9.12 Work to ensure that changes to the operation of the Yolo Bypass, including the Fremont Weir, toe drain, and/or increased frequency of intentional flooding do not adversely affect Yolo County interests. These may include: the economic viability of agriculture within the Bypass, the feasibility of planned development for the Elkhorn Specific Plan, the use of County Road 22 as an alternative route during closures of Interstate 5, and the continued operation of Interstates 5 and 80, and the Union Pacific Railroad across the Bypass.
- Policy CO-9.13 Encourage funding for the construction and operation of the Pacific Flyway Center at a site located next to the Yolo Bypass.
- Policy CO-9.14 Establish Clarksburg as a gateway entry for visitors to the Delta region seeking agricultural tourism, ecotourism, and recreational opportunities.

- Policy CO-9.15 Seek legislation to clarify that property within the Clarksburg growth boundary is in the Secondary Zone of the Delta.
- Policy CO-9.16 Pursue funding to assist non-governmental organizations acquire agricultural conservation easements within Yolo County, where appropriate.
- Policy CO-9.17 Pursue funding to assist non-governmental organizations acquire habitat conservation easements within Yolo County, where appropriate.
- Policy CO-9.18 Support the establishment of a Delta Conservancy to provide funding and work with federal, State and local governments, local Habitat Conservation Programs, nonprofit organizations, and landowners on improvements to Delta management.
- Policy CO-9.19 Vigorously protect all water rights related to lands within Yolo County, including areas of origin, riparian water rights, and other existing water rights.
- Policy CO-9.20 Work to ensure recognition by the Central Valley Regional Water Quality Control Board (CVRWQCB) of the economic, habitat, water resources, and flood management impacts associated with developing Total Maximum Daily Loads (TMDLs) for mercury within the Delta.
- Policy CO-9.21 Recognize the special character of "heritage" or "legacy" communities in the Delta (such as Clarksburg) and promote their economic vitality.
- Policy CO-9.22 Seek to ensure that future changes to the boundaries of the Delta, including the boundaries of the Primary and Secondary Zones, are consistent with the goals and policies of this General Plan.
- Policy CO-9.23 Work to ensure that State and federal habitat restoration efforts recognize and support the Yolo Natural Heritage Program.
- Policy CO-9.24 Pursue policy and legislative strategies to ensure that the Clarksburg Agricultural District can be fully implemented within the Delta Protection Commission Land Use and Resource Management Plan, Delta Vision, Bay-Delta Conservation Plan, and other regional efforts.

3. Implementation Program

- Action CO-A111 Pursue recognition and compensation from the State and other appropriate entities, public or private, for the economic effects of changes to the management and governance of the Delta on Yolo County. (Policy CO-9.1, Policy CO-9.3, Policy CO-9.20, Policy CO-9.21)

Responsibility: County Administrator's Office, Parks and Resources
Department
Timeframe: Ongoing

Action CO-A112 Actively participate in State and regional efforts to establish land use policy, regulation, and governance for the Delta to ensure the consideration of Yolo County's interests. (Policy LU-4.2, Policy CO-20, Policy CO-9.21)
Responsibility: Planning and Public Works Department, County Administrator's Office, Parks and Resources Department
Timeframe: Ongoing

Attachment "D"

Attachment D: Redline (track changes) version of the Health and Safety Element, Section 2. Flood Hazards

A hardcopy of the redline version is inserted after this page. The electronic version is a separate file titled "YCFWCD redline version of H&S Element".

HEALTH AND SAFETY ELEMENT
 COUNTY OF YOLO
 2030 COUNTYWIDE GENERAL PLAN
 HEALTH AND SAFETY ELEMENT
 HS-11

a. Background Information

Floods are a natural process that help define the character of our ecosystems. They also pose threats to our safety and property. Managing flood risk is a balance between allowing the ecological benefits of flooding to occur and limiting our exposure to harm. Flood risk has traditionally been evaluated by considering the area inundated by the flood that has a 1% chance of occurring in any year, based on historical data (commonly referred to as the 100 year flood). Yolo County has five watersheds where the 100 year flood has the potential to impact communities:

Deleted: Located in a natural floodplain.

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Water body	Communities Effectcd
<u>Sacramento River/ Yolo Bypass</u>	<u>Clarksburg and Knights Landing</u>
<u>Colusa Basin Drain</u>	<u>Knights Landing</u>
<u>Cache Creek</u>	<u>Woodland</u>
<u>Willow Slough</u>	<u>Madison and Esparto</u>
<u>Dry Slough</u>	<u>Winters, DQ University, County Airport, and Davis</u>

Deleted: Cache Creek

Deleted: Basin/Woodland; the Sacramento River corridor (including the Yolo Bypass, as well as Clarksburg and Knights Landing); Willow Slough, (including Madison and Esparto), Colusa Basin Drain (including Knights Landing) and Dry Slough (including Winters, DQ University, County Airport, and Davis).

The Federal

Emergency Management Agency (FEMA) creates Flood Insurance Rate Maps (FIRMs) that designate 100-year floodplain zones

Figure HS-4 identifies the existing 100-year floodplain contours as identified by FEMA for Yolo County. Levees along the Sacramento River, Yolo Bypass, and Cache Creek are currently being evaluated to determine whether they conform to FEMA's 100-year standard. The results of these levee studies may

Deleted: A 100-year floodplain zone is the area that has a one in one hundred (1 percent) chance of being flooded in any one year based on historical data.

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change the extent and/or depth of flooding shown on the FIRMs. It is projected that climate change will alter the frequency of large floods and that the techniques used to produce flood risk maps will be changing. The California Department of Water Resources will be developing new 200 year storm inundation maps. Communities listed above could be affected by more than one water body in a flood produced by a 200 year or greater event. Traditional flood control focused on building structures to control flood flows. Contemporary management combines structural and non-structural elements (e.g. warnings, emergency response) to improve safety and lower risk.

In addition to hazards from natural flood events, portions of Yolo County are also located downstream of several dams with large inundation areas, as shown in Figure HS-5. In the unlikely event that any of these dams were to fail, the inundation zones indicate areas that could potentially be flooded. If the dams at Indian Valley Reservoir, Lake Berryessa or along the Sacramento, Feather or American rivers were to fail, the majority of the cities of Woodland, Winters and Davis would be inundated by floodwaters. The entire unincorporated communities of Runsey, Capay, Madison, Knights Landing and Clarksburg and parts of Guinda, Esparto, Monument Hills and Yolo are located within dam inundation zones.

As a result of rapid population growth and escalating housing costs in the past ten years, there has been increasing pressure in the Sacramento Valley to build homes and other structures in natural floodplains. There has been limited growth within the floodplains of unincorporated Yolo County, however, due to policies that have restricted growth in general within the unincorporated area.

Development within the floodplain can have negative environmental implications that can both lead to increased risk of flooding and expose people and property to flooding risks. Urban development increases the amount of impervious surface and therefore

increases surface water runoff and accelerates the timing of peak runoff flows. This results in increased erosion, sedimentation and water quality problems in surface runoff, as well as increased risk of flooding.

Responsibility for flood protection is distributed among many agencies at various levels of government. At the federal level the three primary agencies are the Army Corps of Engineers, the FEMA, and the Bureau of Reclamation. At the state level the primary agencies are Department of Water Resources and the Reclamation Board. At the local level in Yolo County and the region these agencies include: the County of Yolo and each of its four cities; the Yolo County Flood Control and Conservation District, 15 local reclamation districts, the Knights Landing Ridge Drainage District, the Madison Storm Drainage Maintenance District, various County Service Areas, and the Sacramento River West Side Levee District.

Yolo County has approximately 215 miles of levees, managed by various agencies, including the County, 13 reclamation districts, one levee district, one drainage district, and the California Department of Water Resources. These levees provide flood protection to West Sacramento, Woodland, Knights Landing, Clarksburg, Davis and important agricultural lands. In addition, the Yolo Bypass, the Sacramento Weir, and the Fremont Weir help protect Sacramento and other urban communities in the region from flooding by the Sacramento River. Some levees, particularly those that protect parts of the City of Woodland and unincorporated Yolo County, the vicinity of Cache Creek and the town of Yolo, only provide a 10-year level of flood protection rather than the 100-year federal standard. Without work to improve these levees, additional development in Yolo County's floodplain could put more residents at risk of flooding

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hazards.

The local levees have been assumed to provide adequate protection since their acceptance into the Sacramento River Flood Control Project in 1918. Recently, where insufficient geotechnical information exists to evaluate the integrity of the levees, the State Department of Water Resources has taken the position, in conjunction with FEMA, that levees may not be recertified, and therefore changes in flood insurance requirements are likely. DWR has completed geotechnical evaluations of the urban Sacramento River Flood Control Project levees within the county, and proposed to do additional (as yet unknown) evaluations of non-urban levees in the next two years. Preliminary indications are that local levees will not be considered adequate to protect against the 100 year flood.

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The State Assembly and Senate, in 2006 and 2007, produced legislation governing various aspects of flood planning. The following list includes legislation applicable to Yolo County:

- „ AB 5 - Flood Management. Renames the Department of Water Resources (DWR) Reclamation Board as the Central Valley Flood Protection Board (CVFPB), and expands its size, duties, and powers. Makes clarifying and technical changes to the State's new flood planning legislation.
- „ AB 70 - Flood Liability. Requires a city or county to contribute its fair share to property damage caused by a flood, to the extent that the jurisdiction increased the State's exposure to liability by approving new development within the boundary of a state flood control project.
- „ AB 162 - Requires cities and counties to address flood-related matters in the land use, conservation, safety, and housing elements of their General Plans.

„ AB 930 - Flood Management. Expands the powers of the Sacramento Area Flood Control Agency to include the acquisition of land easements.

„ SB 5 – Flood Management. Requires DWR and the CVFPB to prepare and adopt a Central Valley Flood Protection Plan by 2012. Requires cities and counties in the Sacramento-San Joaquin Valley to amend their General Plan and Zoning Ordinances to be consistent with a newly adopted Flood Management Plan within 36 months of flood plan adoption. Establishes other flood protection requirements for local land-use decisions consistent with the Central Valley Flood Protection Plan.

Senate Bill 5 (2007) establishes higher standards of flood protection (generally 200 year protection) for urban and urbanizing areas (defined as areas of at least 10,000 residents, or which will grow to 10,000 or more within the next 10 years). Other areas remain subject to the pre-existing 100-year standard for protection. Yolo County's unincorporated communities are all well under the 10,000 population threshold at this time and therefore are generally not affected by this new legislation, however, future planned growth in Dunnigan will be required to meet the higher 200-year standard.

b. Policy Framework

GOAL HS-2 Flood Hazards. Protect the public and reduce damage to property from flood hazards.

Policy HS-2.1 Manage the development review process to protect people, structures, and personal property from unreasonable risk from flooding and flood hazards.

Policy HS 2.1? Establish a flood risk management process that considers and allows for ecological benefits of flooding while balancing the public safety and protection of property.

Policy HS 2.2? Develop strategies that consider the risks that exist from floods larger than the flood used to design structural solutions or in the event of a structural failure and develop strategies that provide for rapid recovery following a flood event.

Policy HS-2.2 Evaluate the ability for existing levees to provide adequate protection and where levees are insufficient consider levee improvements, the installation of setback levees, and other structural and non-structural solutions.

Deleted: Ensure and enhance the maintenance and integrity of flood control levees.

Policy HS2.X Develop strategies throughout the county to reduce flood risk in ways that recognize the various types of flooding, local conditions, differences in watershed and flood dynamics, the ability for people to evacuate an area, and the capacity of communities to recover from flooding.

Policy HS-2.3 Actively update and maintain policies and programs to ensure consistency with State and federal requirements.

Policy HS-2.4 Clearly communicate the risks, requirements, and options available to those who own land and live within the floodplain.

Policy HS-2.5 Within the Delta Primary Zone, ensure compatibility of permitted land use activities with applicable properly adopted flood control and protection policies of the Land Use and Resource Management Plan of the Delta Protection Commission.

Policy HS-2.6 Maintain the structural and operational integrity of essential public facilities during flooding.

c. Implementation Program

Action HS-A4 Require a minimum of 100-year flood protection for new construction,

and strive to achieve 200-year flood protection for unincorporated communities where such levels of protection are not provided, require

Deleted: ?

new development to adhere to the requirements of State law and the County Flood Damage Prevention Ordinance. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A5 Continue to require habitable structures in the 100-year floodplain to be designed and constructed so that they do not significantly contribute to cumulative flooding that could pose a hazard to surrounding landowners and/or the public. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A6 Yolo County shall not approve any discretionary permit, or ministerial permit, that would result in the construction of a new residence, for a project located within a flood hazard zone, unless the County can make the findings identified in Section 65962a of the Government Code. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A7 Locate new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities. Where such location is not feasible, incorporate methods to minimize potential flood damage to the facility.

Policy HS-2.6)

Responsibility: Planning and Public Works Department, General
Services Department, Office of Emergency Services

Timeframe: Ongoing

Action HS-A8 ~~Require new developments to detain the stormwater runoff caused by~~
a 100-year storm event. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Comment (MSO/office1): I am not sure this is possible. If we are only trying to contain the runoff from the 100 year event on site, that may be feasible. But where a development is exposed to a flood flow, the water moving through the development over the course of the event may be too great to keep on sight. Also 100 yr event retention may not be consistent with natural hydrology. It would be better to make the development consistent with natural patterns of runoff.

Action HS-A9 Limit the construction of extensive impermeable surfaces and promote the use of permeable materials for surfaces such as driveways, and parking lots. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A10 Locate new structures outside of the floodplain, where feasible, and implement appropriate methods to minimize potential damage where new construction occurs within flood hazard zones. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A11 Evaluate the feasibility of designating land as open space for future bypass systems to prevent flooding hazards. Work with State and Federal agencies to include such bypasses in the Central Valley Flood

Protection Plan, where appropriate. Ensure that responsible agencies fund the purchase of flood easements where bypass systems are designated. (Policy IIS-2.1)

Responsibility: Parks and Resources Department

Timeframe: Ongoing

Action IIS-A12 Review development proposals to ensure that the need to maintain flood control capacity is balanced with consideration of the environmental health of watercourses that convey floodwaters so as not to cause significant erosion, sedimentation, water quality problems, or loss of habitat. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A13 Require a minimum 50-foot setback for all permanent improvements from the toe of any flood control levee. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action IIS-A14 Restrict proposed land uses within 500 feet of the toe of any flood control levee, including but not limited to:

- „ Prohibit permanent unlined excavations;
- „ Basements or swimming pools must be engineered to withstand the uplift forces of shallow groundwater;
- „ Prohibit below-grade septic leach systems;

- „ Engineered specifications for buried utility conduits and wiring;
- „ Prohibit new water wells;
- „ Prohibit new gas or oil wells;
- „ Engineered specifications for levee penetrations; and
- „ Require landscape root barriers within 50 feet of the toe. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

HS-18

Action HS-A15 Support the efforts of levee maintenance districts with efforts to secure state and federal funding for geotechnical studies of levees and implementation of associated improvements. (Policy HS-2.2)

Responsibility: County Administrator's Office

Timeframe: Ongoing

Action HS-A16 Encourage flood hazard reduction projects along the Sacramento River to be consistent with the guidelines of the Sacramento River Corridor Floodway Management Plan. (Policy HS-2.2)

Responsibility: Parks and Resources Department

Timeframe: Ongoing

Action HS-A17 Coordinate with local, State and federal agencies to define existing and potential flood problem areas, including the possible impacts associated with global climate change, and to maintain and improve

levees and other flood control features. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: 2012/2013

Action HS-A18 Develop a detailed maintenance and funding plan for levees under County control, to ensure that levee safety is maintained. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A19 Support and encourage responsible agencies to site new levees or major rehabilitation of levees at a distance from the river and from existing levees, where feasible. This would provide a degree of redundancy in the system, increase the land available for habitat and flood storage, reduce operation and maintenance costs, and help to ensure the integrity of the structures. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A20 Private development of levees should be limited to those cases where the construction meets national levee standards, the project is in conformance with the state's comprehensive plan for flood damage reduction, and a public agency agrees to provide long-term maintenance of the levee. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A21 Ensure that the upgrade, expansion, or construction of any flood control levee demonstrates that it will not adversely divert flood water or increase flooding. (Policy HS-2.2)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A22 Work cooperatively with other local agencies and interested parties to develop funding mechanisms to finance the local share of design, construction, and capital costs for repairs and improvements to flood control levees. (Policy HS-2.2)

Responsibility: Parks and Resources Department

Timeframe: Ongoing

Action HS-A23 Improve the county's classification within the Federal Emergency Management Agency Community Rating System. (Policy IIS-2.3)

Responsibility: Planning and Public Works Department

Timeframe: 2009/2010

Action HS-A24 Pursuant to Sections 65302.9 and 65860.1 of the Government Code, amend the Zoning Ordinance and General Plan, as appropriate, to be consistent with the adopted Central Valley Flood Protection Plan. (Policy HS-2.3)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A25 Review on an annual basis those portions of the unincorporated area that are subject to flooding, based on mapping prepared by the Federal Emergency Management Agency and/or the Department of Water Resources, and amend the General Plan as appropriate to reflect any changes. (Policy HS-2.3)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A26 Revise the Health and Safety Element, concurrently with the regular update to the Housing Element, to include new information regarding floodplain mapping and/or regulation. (Policy HS-2.1, Policy HS-2.3)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A27 Take all reasonable and feasible actions to mitigate potential flood damage for new construction on agriculturally designated land in areas protected by the Sacramento River Flood Control Project and related flood protection efforts. (Policy HS-2.1)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A28 Pursuant to Section 8201 of the State Water Code, develop local plans for flood protection, including analysis of financing options to construct and maintain any needed improvements, to address how 100-year floodplain protection for each community may be provided. Those communities that are economically disadvantaged shall have priority in developing flood protection plans. The cities shall be consulted in development of the plans, which shall be consistent with the Central Valley Flood Protection Plan. (Policy HS-2.1, Policy HS-2.2)

Responsibility: Parks and Resources Department

Timeframe: 2014/2015

Action HS-A29 Maintain and update on a regular basis the County Flood Damage Prevention Ordinance, to ensure its conformity with the State Model Flood Ordinance and all Federal Emergency Management Agency requirements. (Policy HS-2.1, Policy HS-2.3)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A30 Inform the public about the specific risks of living in areas at risk of flooding, and provide steps property owners can take to reduce their exposure to flood damages. Encourage all landowners within the 100- or 200-year floodplain, and/or within areas protected by levees, to purchase and maintain flood insurance. (Policy HS-2.4)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A31 Require that all residential development projects located within floodplains include a prominent deed disclosure regarding the potential flood risk to future buyers. (Policy IIS-2.4)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A32 Develop and implement a public outreach campaign to notify landowners and tenants of their flood status, options for flood insurance, evacuation plans, flood protection programs, locally responsible flood agencies, and other related topics. (Policy HS-2.4)

Responsibility: Parks and Resources Department, Planning and Public Works Department, Office of Emergency Services

Timeframe: 2010/2011

Action HS-A33 Amend the County's Development Agreement enabling ordinance to include the applicable restrictions from Section 65865.5 of the Government Code. (Policy HS-2.3)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action HS-A34 Develop emergency response plans and systems for floodplain evacuation and flood emergency management. Educate the public

regarding these plans. (Policy HS-2.4)

Responsibility: Office of Emergency Services

Timeframe: Ongoing

Action HS-A35 Evaluate the creation of a countywide agency to provide flood control and protection. (Policy IIS-2.2, Policy HS-2.4, Policy HS-2.6)

Responsibility: County Counsel, County Administrator's Office, Parks and Resources Department

Timeframe: 2009

Action HS-A36 Continue to work with the Flood Control District and the City of Woodland to develop strategies and pursue funding for the implementation of projects to improve flood protection for urban and rural residents along lower Cache Creek. (Policy HS-2.2)

Responsibility: County Administrator's Office, Parks and Resources Department

Timeframe: Ongoing



Yolo County Resource Conservation District

221 West Court Street, Suite 1
Woodland, CA 95695
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Website: www.yolorcd.org

November 26, 2008

David Morrison, Assistant Director – Development
Services, Planning and Public Works Department
County of Yolo
PLANNING AND PUBLIC WORKS DEPARTMENT
292 West Beamer Street
Woodland, CA 95695-2598
david.morrison@yolocounty.org

Subject: YCRCD Comments on General Plan

Dear Mr. Morrison:

The Yolo County Resource Conservation District appreciates the opportunity to provide comments on the 2030 Countywide General Plan. The RCD has a great interest in how the plan shapes the natural and agricultural landscape in the County, and we are eager to work with the County and our landowners to implement measures that support agricultural and conservation resources. I list a few comments below.

I appreciate that the plan contains several innovative concepts that could help preserve the quality of life in Yolo County and support an economically viable rural economy. For example, I support the agricultural districts concept and believe that if fully embraced, could result in positive value-added economic incentives to preserve agricultural land uses. However, I see no reason why this concept could expand to cover other agriculturally areas of the County, if successful. Language to leave this possibility open would be helpful.

I would like to see clarification of a few of the statements in the Agricultural and Economic Development Element. For example, Page AG-1, 1st paragraph ("Mitigation for loss of farmland through agricultural conservation easements and/or land dedication is required,") and Policy AG-1.5 ("Strongly discourage the conversion of agricultural land for other uses..."), might suggest that farmer's conversion of a portion of their property for habitat requires mitigation. Improved habitat can provide clear agricultural benefits (i.e. for increasing pollination services), and even the perception that such habitat improvements might require mitigation, will stifle implementation. Our experience suggests that improved habitat (i.e. removal of 2 acres of row crops to create a riparian corridor along a drainage ditch) often can increase agricultural production or help growers meet other important goals (i.e. improved water quality from drainage). Mitigation would multiply the costs and essentially eliminate these valuable projects. In addition, we would like to see growers maintain flexibility to take advantage of habitat

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programs (such as the Conservation Reserve Program), if they choose, without being subject to mitigation requirements. Therefore, we would like to see a clear expression of this sentiment.

Native vegetation buffers between cities and farmland (or between cities) may help minimize conflicts between urban and agricultural uses and should be considered. These areas could provide unique recreational opportunities and safe bike transit routes, intercept sounds, and dust, and more clearly define boundaries.

The number of units noted for the Dunnigan area has raised some concern from our landowners in the area. They are concerned about the strain on infrastructure, water, and agricultural land in the area and the growth inducing impacts of such a move.

We appreciate the efforts to protect water resources, however, our partners have expressed concern about the creation of a bureaucracy to manage water resources and would like to have the County thoroughly examine existing agencies and mechanisms to protect water resources, before a new agency is created.

Again, we thank you for the opportunity to comment and look forward to working with the County in the future. The plan has several innovative concepts and may provide a good model for other rural counties struggling with protection of farmland and integration of ecological stewardship.

Sincerely,

Dan Efseaff
Executive Director

Enclosure(s):
Copy:



"When You're Going Somewhere"

City of Davis • City of West Sacramento • City of Winters
 City of Woodland • County of Yolo
 Ex Officio - CalTrans District 3 • University of California - Davis

Yolo County Transportation District
 350 Industrial Way
 Woodland, CA 95776
 (530) 661-0816 FAX:(530) 661-1732
 www.yolobus.com

November 20, 2008

County of Yolo
 Planning and Public Works
 292 W. Beamer Street
 Woodland, CA 95695-2598

Attention: David Morrison

RE: General Plan Update

Dear Mr. Morrison:

Thank you for the opportunity to review the "General Plan Update". As you may know Yolo County Transportation District (YCTD) is both the operator of YOLOBUS Transit System and the Congestion Management Agency for Yolo County. As the operator of YOLOBUS, YCTD provides service to many of the county's small towns including Capay, Dunnigan, Esparto, Knights Landing, Madison and Yolo. YCTD services rural Yolo County to provide a much needed alternative to single occupancy vehicle travel. As the Congestion Management Agency, YCTD works with local agencies to create, monitor and mitigate traffic congestion throughout Yolo County.

YCTD has these general comments to the General Plan Update;

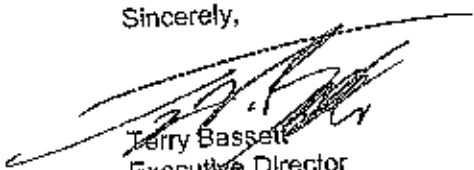
YCTD is encouraged by Yolo County's commitment to keeping the jobs/housing ratio in the town of Dunnigan as high as possible. YCTD sees the future growth of Dunnigan as a major battle ground for dealing with traffic congestion through out Yolo County. A good jobs/housing ratio can go a long way to decreasing congestion and making transit more economically effective.

YCTD understands that any development within Yolo County will increase the traffic congestion on the Yolo County street and highway network. These increases in traffic congestion need to be met with increased congestion mitigation in order to keep both Yolo County's economy and transportation moving. YCTD is more than willing to work with Yolo County to create mitigation measures which will help to decrease congestion, decrease single occupancy vehicle trips and increase transit, bike and walking trips. YCTD believes that the right community design features, transit services and mode split requirements, will mitigate much of the traffic congestion from future developments. YCTD recommends that the County set high mode split goals for future developments to encourage walking, biking and taking transit.

YCTD also wants to inform Yolo County that increased development in the County as outlined in the General Plan Update has the possibility of creating unmet transit needs, thus requiring YCTD to spend TDA funds to provide service to areas of the county which currently have little or no service. As you may know TDA funds can only be used for streets and roads after all unmet transit needs are met. Thus, increases in YOLOBUS service throughout the unincorporated areas of Yolo County can lead to decreased TDA funds for streets and roads unless other sources of funding are provided.

Should you require more information or need clarification, please do not hesitate to contact Erik Reitz at (530) 661-0816 X 13 or ereitz@yctd.org.

Sincerely,


 Terry Bassett
 Executive Director

David Morrison

From: Steve Weiss [yolofd800@yahoo.com]
Sent: Friday, December 05, 2008 7:16 AM
To: David Morrison
Subject: 2030 General Plan

76.

David,

I realize that November 20 was the cutoff date for comments, but I have one correction. Under Public Facilities, section 5.a, the Yolo Fire Protection District has 3 elected Board Members, not 1. Just thought I would clarify that.

Thanks

Steve Weiss, Chief
Yolo Fire Protection District
PO Box 466
Yolo, CA 95697
Station (530) 662-0566
Fax (530) 662-7022
Cell (530) 681-3459

General Recommendations

Policies versus Actions: It seems that there is not a clear distinction between a policy and an action. Many policies have action-like language, however if they are not stated as a specific actions they will not be assigned a priority. We have provided examples below.

Principles and Objectives

VI-3: Objective 2.3. Protect natural waterways (e.g. rivers, creeks, lakes and sloughs,) wildlife habitats and other sensitive resources. ***This is the only Objective related to wildlife habitat and sensitive natural resources. The Natural Heritage Program is not mentioned. Habitat restoration is not mentioned.***

Land Use and Community Character Element

Yolo Land Trust strongly supports the extensive policies and actions in this element for preserving farm land and has the following comments on specific policies and actions.

Policy LU-2.1 Planned urban growth that occurs at the inside edge of a growth boundary where it will permanently adjoin agricultural land must provide a minimum 300-foot buffer. The buffer area shall be designated Open Space. Agricultural buffers are not required for planned urban growth elsewhere within a growth boundary because the agricultural-urban interface will be temporary until full buildout occurs. ***(This whole policy appears to be an action to support a more general policy of protecting agriculture in Policy CC-2.5)***

Policy LU-2.3 Manage agricultural parcels of less than 20 acres, including antiquated subdivisions where appropriate, to create compatibility with surrounding agricultural uses to the greatest extent possible ***(This seems to be the policy, or even more simply the last part "create....")***, including: 1) discourage residential development; 2) encourage lot mergers to achieve larger parcel sizes; 3) encourage clustering of units to preserve farmland and natural resources; 4) encourage transfers of development rights to areas where additional farm dwellings are desired (e.g. organic farms that are labor intensive); 5) encourage deed restrictions, site design and development themes that support the agricultural use of the land; and 6) aggressively limit the impact of residential development where it does occur ***(These are good actions to support the policy of creating compatibility – however, each action should specifically address how it will be "discouraged" or "encouraged".)***

Policy LU-2.4 Prohibit the division of land in an agricultural area if the division is for non-agricultural purposes and/or if the result of the division will be parcels that are infeasible for farming. ***(This should be an action to support the policy of protecting agriculture – however, the action should state how it will be "prohibited")***

Policy LU-2.5 Vigorously conserve and preserve the agricultural lands in areas outside of adopted community growth boundaries and outside of city SOIs. ***(This is a good policy and should be supported by specific actions listed below.)***

Policy CC-1.2 Preserve and enhance the rural landscape as an important scenic feature of the County ***(This is the policy)***. The discretionary review of development proposals shall evaluate and address impacts on scenic landscapes and views ***(This should be an action to support this policy)***.

Policy CC-1.7 Reinforce the growth boundaries for each community ***(This is the policy, but seems already be addressed in Policy LU-2.4)*** through appropriate mechanisms including greenbelts, buffers,

conservation easements and other community separators (***These should each be actions - however need to state how each of these will be implemented***).

Policy CC-1.10 Protect existing ridgelines and hillsides from visually incompatible development (***This could be added to Policy CC-1.2***).

Policy CC-1.11 Require the development of open space corridors, bicycle paths and trails integrating waterways, scenic areas and County parks as a part of project approval where appropriate (***This should be an action***). The intent is to connect each community and city and other special places and corridors, throughout the County (***This seems to be a policy or goal***).

Policy CC-1.12 Preserve and enhance the scenic quality of the County's rural roadway system (***Policy – this could be incorporated into CC-1.2***). Prohibit projects and activities that would obscure, detract from, or negatively affect the quality of views from designated scenic roadways or scenic highways (***This should be an action, but needs to explain how projects and activities will be prohibited***).

Policy CC-1.14 The County may designate other scenic roadways or routes using the following criteria: the roadway or route traverses a scenic corridor, water feature, open space area or other interesting or unique areas, both urban and rural and may include bikeways, hiking and riding trails and pedestrian ways (***This is an action, however, should be strengthened by saying "Designate other...."***).

Policy CC-1.15 The following features shall be protected and preserved along designated scenic roadways and routes: (***This should be an action, but needs to state how these features will be protected and preserved. This action should be strengthened by stating "Protect and preserve features along..."***)

- Trees and other natural or unique vegetation
- Landforms and natural or unique features
- Views and vistas

Action CC-A6 Establish formal buffers between cities. Direct conservation easements to buffer areas between unincorporated communities to reinforce community separation and keep each town distinct and unique (***This action should state how conservation easement will be "directed", for example: formal agreements between government entities, using the mitigation ordinance, strategic conservation planning with other agencies and land trusts***). (Policy CC-1.7, Policy CC-2.5, Policy CC-2.6)

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action CC-A15 Undertake a collaborative effort with farming and agricultural interests to receive input regarding farm dwelling site development criteria and other ideas for addressing rural residential conflicts, including cluster zoning, noticing for the County's Right to Farm Ordinance and the "rural oath." (***This seems too general – need separate into specific implementation actions for each of these tools, not only a "collaborative effort"***). (Policy LU-2.1)

Responsibility: Planning and Public Works Department, Agriculture Department

Timeframe: 2010/2011

Action CC-A11 Seek voter approval of an intra-county and/or regional fee or tax for the preservation of agricultural, habitat, or open space land in Yolo County. (***Very good action, but will the county be prepared to seek voter approval in 2010/2011?***) (Policy LU-6.4, Policy LU-7.1, Policy LU-7.3, Policy LU-7.4, Policy LU-7.5, Policy LU-7.6)

Responsibility: County Administrator's Office, Parks and Resources

Department

Timeframe: 2010/2011

Action CC-A28 Control farm dwelling site development to avoid cumulative constraints on agricultural operations by establishing specific criteria for approval. Proposed homes that comply with the criteria would be issued Building Permits, while those that are not consistent with the criteria would require approval of a Use Permit. Criteria may apply to both the primary and the ancillary home and would include but not be limited to the following: ***(This could be combined with Action CC-A11)***

- Size of the home(s).
- Location of the home(s) within the property.
- A stewardship plan demonstrating how the property would be farmed.
- Placement of the remainder of the property, outside of any primary and ancillary home site(s), in a permanent agricultural conservation easement. ***(If an easement is a condition of approval of a Use Permit, should state that is will be closely coordinated with the easement holder.)***
- Home sites less than 20 acres require a Use Permit.

(PolicyLU-2.3)

Responsibility: Planning and Public Works Department, Agriculture

Department

Timeframe: 2010/2011

Recommendation for organizing select Policies and Actions for Land Use and Community Character Element

Policies (the what):

- 1) Implement already established growth boundaries around communities;
- 2) Create a buffer (greenbelt) between communities to...;
- 2) Minimize rural/residential conflicts;
- 3) Maintain parcel sizes outside of the community growth boundaries large enough to sustain viable agriculture and discourage conversion to non-agricultural home sites (Policy AG-1.2).
- 4) Avoid cumulative constraints on agricultural operations from rural residential development and land use activities that are not compatible within agriculturally designated areas. Ensure that development will not have a significant adverse effect on the economic viability or constrain the lawful practices of adjoining or nearby agricultural operations, except for land within the Sphere of Influence (SOI) around a city or within the growth boundary around an unincorporated community;
- 5) Regulate and encourage removal of incompatible land uses and facilities from agriculturally designated lands (Policy in Ag element, but not in LU element).
- 6) Protect the rural character and scenic resources, including ridgelines and hillsides, scenic roads and routes, native vegetation, waterways, trees and other natural or unique vegetation, landforms and natural or unique features, unique views and vistas;
- 7) Connect each community and city and other special places throughout the County with open space corridors and bikeways, and trails.

Actions (the how) YLT is concerned if the policies do not have a corresponding action that describes the implementation mechanism and timeline, the policy may not be implemented:

- 1) Require a 300-foot buffer around development at growth boundary. (Currently not specific action for this – only policy)
- 2) Discourage residential development on antiquated subdivisions and control farm dwelling site development on rural parcels by implementing farm dwelling site development criteria for approval of building and use permits. (CC-A15, CC-A28, also action in Ag Element)
- 3) Encourage cluster zoning to... (CC-A15 – but no how: zoning code change, condition of building or use approvals; working with conservation easement holders)
- 4) Implement/revise County Rights to Farm Ordinance and develop a "rural oath" (CC-A15, also action in Ag element)
- 5) Allow for Transfer of Development Rights (Currently there is no action for implementing TDRs in this element. How could this be implemented: condition of conservation easement, identifying receiving sites within SOIs)

- 6) Encourage lot mergers and prohibit the division of land for non-ag purposes (Currently not an action for this. How do we encourage..?)
- 7) Establish formal buffers (greenbelts) and encourage protection of land outside of growth boundaries through directing conservation easements to these buffers (CC-A6, How – formal agreements between county and cities, mitigation ordinance, strategic planning with land trusts?)
- 8) Limit the extension of urban service facilities and infrastructure, particularly sewers into areas zoned for agriculture. (currently not an action in LU element, and only policy in Ag element).
- 8) Regulate and encourage removal of incompatible land uses and facilities from agriculturally designated lands (Policy in Ag element, but not in LU element. Currently not an action in either LU or AG element. How to regulate removal?).
- 9) Seek voter approval for fee or tax for land preservation (CC-A11)
- 10) Conduct discretionary review of development proposals to evaluate and address impacts on scenic landscapes and views and prohibit projects and activities that would obscure, detract from, or negatively affect the quality of views from designated scenic roadways or scenic highways (Currently not an action)
- 11) Direct conservation easements to protect views from scenic roads and routes, ridgelines and hillsides, (Currently not an action. How to implement: work with easement holders on strategic conservation plans?).
- 12) Require the development of open space corridors, bicycle paths and trails integrating waterways, scenic areas and county parks as a part of project approval where appropriate (Currently not an action)
- 13) Designate other scenic roadways or routes using the following criteria: the roadway or route traverses a scenic corridor, water feature, open space area or other interesting or unique areas, both urban and rural and may include bikeways, hiking and riding trails and pedestrian ways. (Currently not an action)

Agriculture and Economic Development Element

Yolo Land Trust strongly supports the extensive policies and actions in this element for preserving agriculture and has the following comments on specific policies and actions.

Policy AG-1.2 Maintain parcel sizes outside of the community growth boundaries large enough to sustain viable agriculture and discourage conversion to non-agricultural home sites. (Also covered in LU element; need to cross-reference)

Policy AG-1.3 Prohibit the division of agricultural land for non-agricultural uses (Also covered in LU element; need to cross reference) .

Policy AG-1.4 Prohibit land use activities that are not compatible within agriculturally designated areas (Also covered in LU element; need to cross-reference)

Policy AG-1.5 Strongly discourage the conversion of agricultural land for other uses (All qualities of ag land? Includes conversion to habitat or only urban uses? Needs qualification or may have

unintended consequences.) No lands shall be considered for redesignation from Agricultural to another designation unless all of the following findings can be made: ***(This last part should be an action)***

A. There is a public need or net community benefit derived from the conversion of the land that outweighs the need to protect the land for long-term agricultural use.

B. There are no feasible alternative locations for the proposed project that are either designated for non-agricultural land uses or are less productive agricultural lands.

C. The use would not have a significant adverse effect on existing or potential agricultural production on surrounding lands designated Agriculture.

Policy AG-1.6 Continue to mitigate at a ratio of no less than 1:1 the conversion of farm land and/or the conversion of land designated or zoned for agriculture, to urban uses.

Policy AG-1.7 Locate farm dwellings in a manner that protects both on-site and offsite agricultural practices. All dwellings in agriculturally zoned areas shall be encouraged to be located on portions of the parcel unsuitable for agricultural use and in "clustered" configurations. ***(Policy also covered in LU element; need to cross-reference)***

Policy AG-1.8 Ensure that development will not have a significant adverse effect on the economic viability or constrain the lawful practices of adjoining or nearby agricultural operations, except for land within the Sphere of Influence (SOI) around a city or within the growth boundary around an unincorporated community. ***(Policy also covered in LU element; need to cross-reference)*** New urban (non-agricultural) development shall be set back a minimum of 300 feet from adjoining agricultural land. A minimum 300-foot setback shall also be required for sensitive areas that are used as public gathering places (e.g. schools, churches, parks and detention basins) that adjoin agriculturally zoned land. ***(This last part is an action also covered in LU element; need to cross-reference)***

Policy AG-1.9 Regulate and encourage removal of incompatible land uses and facilities from agriculturally designated lands. ***(Need a related action to describe how to remove incompatible uses.)***

Policy AG-1.10 Work with the Local Agency Formation Commission (LAFCO) on issues of mutual concern including agricultural preservation policies and the establishment and maintenance of logical boundaries for service districts that support existing and planned community growth.

Policy AG-1.11 Protect agricultural lands from urban encroachment by limiting the extension of urban service facilities and infrastructure, particularly sewers. ***(This should be an action to support the policy of protecting ag lands)***

Policy AG-1.12 Maintain growth boundaries around existing communities and neighborhoods to encourage urban infill development and protect adjoining agricultural lands. ***(Policy also covered in LU element; need to cross-reference)***

Policy AG-1.13 Prohibit new residential or suburban subdivisions in areas designated for agricultural use. ***(New policy not covered in LU element; needs corresponding action)***

Policy AG-1.14 Discourage the use of "antiquated subdivisions" for non-agricultural use. ***(Policy also covered in LU element; need to cross-reference)***. The County shall review areas previously subdivided (antiquated subdivisions) for consideration as specialty farming areas. Areas identified for this purpose shall have water and soil characteristics capable of sustaining specialty-farming operations. ***(Should be an action)***

Policy AG-1.15 Preserve agricultural lands using a variety of programs, including the Williamson Act, Farmland Preservation Zones, conservation easements, an Agricultural Lands Conversion Ordinance and the Right-to-Farm Ordinance. **(Each of these programs are separate actions to support the policy of preserving agricultural lands that should be specifically identified. County should undertake collaborative planning process to identify Farmland Preservation Zones).**

Policy AG-1.16 Advocate for maintenance and improvement of the Williamson Act Land Conservation (Agricultural Preserve) Program **(This should be an action to support ag preservation policy).**

Policy AG-1.17 Encourage through voluntary means the coordinated acquisition of agricultural conservation easements by local, State and federal agencies and private conservation organizations with established records of responsible stewardship to protect agriculture **(This should be an action that states how "coordinated acquisition" is going to happen" – e.g. strategic conservation planning with easement holders).**

Policy AG-1.18 Encourage the coordinated placement of agricultural conservation easements on land most threatened by development, particularly those lands located close to cities and unincorporated communities **(This should be an action that states how "coordinated placement" is going to happen" – e.g. strategic conservation planning with easement holders. Prioritizing conservation easement close to cities is more costly and potentially less acreage will be permanently protected. This strategy should be evaluated as part of a collaborative strategic planning process for identifying Farmland Preservation Zones.)**

Policy AG-1.21 Consider "affordable farming" programs where development impact fees or other funding sources and/or mechanisms are used to create incubator farms and other opportunities for entry-level farming **(This seems to be an action. Stronger action-oriented language than "consider" should be used, such as "investigate and propose programs for" ... ,).**

Policy AG-1.22 Discourage export of County water **(Policy)**. Within conservation easements, preclude the practice of fallowing fields for that purpose. **(Action – however this should be "encourage landowners to preclude this practice within conservation easements". Should note that conservation easements need to be individually negotiated between the landowner and the easement holder and the funder).** Fallowing as a part of normal crop rotation is not subject to this policy.

Policy AG-2.17 Encourage the establishment of agricultural mitigation banks in appropriate locations that provide strategic protection of high value farmland. **(Action – however, should state how to "encourage" – e.g. work with land trusts and other banking entities to develop the framework for ag mitigation banks.)**

Action AG-A1 Amend the Agricultural Mitigation Ordinance to direct agricultural mitigation to areas adjoining growth boundaries for the communities and cities within the County. (Policy AG-1.12, Policy AG-1.8, Policy AG-1.18, Policy CC-1.7) **(See comments on Policy AG-1.18 about planning process to identify priorities for conservation easements.)**

Responsibility: Planning and Public Works Department

Timeframe: Ongoing

Action AG-A2 Negotiate cooperative agreements with neighboring jurisdictions to allow their agricultural mitigation requirements to be satisfied in appropriate locations within Yolo County. Agreements shall consider compensation to Yolo County for lost tax revenues and economic opportunity costs. (Policy AG-1.18) **(YLT supports this action. Mitigation should be directed to Farmland Preservation Zones)**

Responsibility: County Administrator's Office, County Counsel

Timeframe: 2012/2013

Action AG-A3 Verify that easements used for mitigation require the landowner to maintain adequate water rights in perpetuity to support sustainable farm productivity. (Policy AG-1.18, Policy AG-2.2, **Policy AG.1.22**) *(Should note that conservation easements need to be individually negotiated between the landowner, the easement holder, and the funder.)*
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action AG-A4 Consider development, if feasible, of a local and/or regional conservation bank to provide carbon sequestration credits associated with orchards, vineyards and oak woodlands. (Policy AG-1.18, Policy AG- 2.7, Policy AG-2.16) *(There is no policy to sequester carbon in this element; should be added)*
Responsibility: Planning and Public Works Department
Timeframe: Ongoing

Action AG-A5 Amend the agricultural mitigation ordinance to specify that ancillary uses must be clearly subordinate to the primary agricultural use, particularly with regards to home sites. (Policy AG-1.9) *(YLT supports this action)*
Responsibility: Planning and Public Works Department
Timeframe: 2011/2012

Action AG-A6 Develop specific criteria regarding the location and/or placement of home sites on agriculturally designated land, to ensure compatibility with both on-site and surrounding agricultural uses. Proposed homes that comply with the criteria would be issued building permits, while those that are not consistent with the criteria would require prior approval of a use permit. Criteria would apply to both the primary and the ancillary home and may include the following:

- Size and mass of the home(s).
- Location of the home(s) within the property to avoid restricting the extent of pesticide/herbicide spray on adjoining farms and avoid productive agricultural soils and/or operations.
- Approval of a stewardship plan demonstrating how the property would be farmed.
- Placement of the remainder of the property, outside of any home site(s), in a permanent agricultural conservation easement, deed restriction or similar instrument.
- Requirement of a Use Permit for home sites on less than 20 acres.
- Recordation of a deed notice acknowledging the potential for nuisances to occur, such as dust, agricultural chemical applications, etc.
- Recordation of a deed notice acknowledging the County's right-tofarm ordinance. (Policy AG-1.7) □

(This is the same action as in the LU element; need to cross-reference)

Responsibility: Planning and Public Works Department
Timeframe: 2009/2010 *(Timeframe in LU element is 2010/2009)*

Action AG-A27 Implement a voluntary Agricultural Transfer of Development Rights (TDR) program to facilitate the creation of affordable farm worker housing. Such a program would allow for the transfer of existing rights to build farm dwellings from areas characterized by large-acreage farm operations to areas characterized by small farms and/or where labor needs are greater. Develop criteria for appropriate

transfer and receiver locations that take into account factors such as labor needs, crop types and/or other relevant factors and that preclude nonagricultural related transfers. (Policy AG-3.6) ***(TDR program should not be restricted creation of farm worker housing, but instead for generally protecting larger farmable areas.)***

Responsibility: Planning and Public Works Department, Agriculture Department

Timeframe: 2009/2010

Conservation and Open Space Element

Yolo Land Trust strongly supports the policies and actions within this element for creating a network of open space, recreational trails, regional parks, park facilities and infrastructure, and for protecting habitat under the Natural Heritage Program. Again, we suggest that policies should be phrased as what needs to happen, and actions should describe how the County specifically intends on implementing the policy during the planning period.

Policy CO 1.1.5: Support the preservation of open space via acquisition of fee title or easement interest by land trust, government agencies, and conservancies that are consistent with this General Plan. ***(This should be an action and should include acquisition from willing sellers.)***

Action CO-A3: Acquire fee title or easements to promote wildlife migration routes focusing on Cache Creek, the Yolo Bypass, Putah Creek, Willow Slough, the Sacramento River and the Blue Ridge area ***(Should include acquire from willing sellers.)***

78.



1947 Galileo Ct., Suite 103 • Davis, California 95618

(530) 757-3650 • (800) 287-3650 • Fax (530) 757-3670

November 19, 2008

David Morrison
Assistant Director
Yolo County Planning and Public Works Department
Development Services
292 W. Beamer Street
Woodland, CA 95695

Re: Yolo County 2030 Countywide General Plan: comments

Dear Mr. Morrison:

The Yolo-Solano Air Quality Management District (District) appreciates the opportunity to review the Draft 2030 Countywide General Plan (GP). The project consists of an update to the County's 1958 General Plan since its last update in 2003. The proposed GP includes future development plans for the unincorporated county in addition to the Binning Farms, Capay, Clarksburg, Dunnigan, El Macero, Esparto, Guinda, Knights Landing, Madison, Monument Hills, North Davis Meadows, Patwin Road, Rumsey, West Plainfield, Willow Bank, Willow Oak, Yolo, and Zamora communities.

The area in our District's jurisdiction includes all of Yolo County and the northeastern portion of Solano County. The District reviewed the Draft GP and is offering the following comments:

1. The District appreciates the Draft GP's emphasis on promoting bicycles as a transportation mode and its commitment to providing infrastructure to make bicycling convenient. The County may find it useful to specifically highlight bicycling in several of the following principles and objectives in the Vision and Principles Element C. Suggested language for these objectives is shown below in strikeout/underline format:

Objective 2.2: An expanded network of safe and well-maintained parks (both active and passive) throughout Yolo County connected by a network of hiking trails, multi-use pathways and bike routes.

Principle 3.7: Sustainable design in new development, including but not limited to: bicycle and pedestrian-friendly streets with convenient access to public transportation; dense development that makes efficient use of infrastructure capacity and services; universal design features incorporated into new development; provisions for childcare and senior care; specific architectural guidelines for new construction; "green" materials in construction; locally available services and shopping; and sustainable long-term planning principles.

Objective 5.2: An expanded network of bicycle paths, bike lanes, and multi-use trails that connects communities and cities complemented by adequate, convenient, and secure short and long-term bicycle parking facilities.

2. Policy LU-3.3C describes the County's intent to include highway-oriented and regional commercial development along Interstates 5 and 505 to serve regional populations. As demonstrated in Figure LU-1A, 15 acres of General Commercial are sited along Interstate 505 at one of two isolated sites outside of existing communities. The District believes that siting these general commercial developments in existing unincorporated communities or in the incorporated cities in the County would help the County to implement smart growth principles, which would in turn reduce vehicle trips and help to improve air quality.
3. The District is supportive of smart growth strategies and recommends that the County propose growth plans consistent with the projections of the Blueprint plan wherever possible. Since the region's Air Quality Attainment Plan (AQAP) for ozone is partially predicated on the idea that future growth in the region will develop consistent with the Blueprint Scenario, this would assist the region in meeting the air quality improvement goals in the AQAP. For instance, the GP proposes to locate significant residential growth in the Dunnigan, Madison, and Elkhorn communities. Much of the land proposed for development is designated for rural residential and low density residential in the draft general plan. Lower density development decreases the

viability of transit and increases dependence on personal vehicles. This in turn could result in greater transportation and air quality impacts and could make it more difficult to attain the federal 8-hour ozone standard.

4. Land Use Element, Table LU-10: This table indicates a target for residential density of 8 units per acre for the communities of Dunnigan, Knights Landing, and Madison. This relatively low average residential density appears to be inconsistent with many of the existing goals and policies in the draft plan related to the development of sustainable, compact, mixed use, cohesive pedestrian and transit oriented communities.

The County has aimed to implement land use policies such as Policy LU-3.8, which prohibits designation of new urban development in areas of significant natural resources (scenic areas) and/or areas not contiguous to existing urban development, and Goal CC-2 which aims to protect, enhance, and redevelop existing communities. While the District supports the goals and policies proposed in the Draft General Plan, promoting rural development in the Elkhorn area appears counterproductive to achieving some of the County's proposed goals and policies and the region's adopted Preferred Blueprint Plan.

5. Since most of our region's air quality issues are related to vehicle use, the District is providing sample language for incorporation into the letter components of Policy CC-2.16 in order to further promote bicycling and transit use in the GP. Suggested new and deleted language is presented in strikeout/underline format below:

- B. Compact, walkable, ~~bikable, transit-oriented~~ and cohesive communities.
- M. Incorporate a grid street network that provides safe and efficient travel for all modes throughout the community with multiple connections to exterior routes.
- O. Downtown streets shall have parking on both sides where feasible. Convenient and secure bicycle parking shall also be provided in downtown areas.
- S. Avoid noise walls and cul-de-sacs that create barriers for pedestrian and bicycle access to adjacent areas to the greatest possible extent.

- U. Except for parking provided onsite for individual residential lots, parking shall be located to the rear of the facility being served and screened from public view. Parking shall be landscaped to achieve a minimum of 50 percent shading. Conveniently located and secure bicycle parking should also be provided onsite.
6. Circulation Element, Item 7: Figures CI-1A and B and CI-4A and B could be more useful if they included existing and planned major transit terminals such as at the County Fair Mall in Woodland, UC Davis, and the Transit Center in West Sacramento.
7. Circulation Element, Item 7f, Four-Lane County Road/Highway: This section states that the County does not have any four-lane county roads or highways, nor were any considered. However, under Item 8-Planned Roadway Improvements, the Draft General Plan states that County Road 6 will be widened to a four-lane arterial between County Road 99W and the Tehama Colusa Canal. County Road 99W is also proposed to be widened to a four-lane arterial between County Road 2 and County Road 8 in accordance with the regional SACOG SACMET transportation model.
- The District would like to highlight that increasing the number of travel lanes and vehicle speeds to maintain levels of service primarily for single occupant vehicles could increase vehicle speeds and have a negative impact on alternative transportation modes such as bicycling, walking and access to transit.
8. Circulation Element, Item 9, Bicycle and Pedestrian Circulation: The District recommends including the following underlined language to the item: Yolo County is a favorable area for bicycling because of its flat terrain, mild climate and relatively short distances between cities and unincorporated communities.

Additionally, emphasis should also be placed on supporting a positive environment for bicycling and walking within the existing unincorporated communities. This is where the greatest potential exists for conversion of short vehicle trips to bicycle and pedestrian trips.

9. Circulation Element, Figure CI-3 does not show proposed future bike facilities as indicated under the Bicycle and Pedestrian Facilities. Clearly showing proposed bike infrastructure would be useful for both decision-makers and the general public.
10. Circulation Element, Policy CI-3.6: The District recommends including the following language in this policy: "Develop roadway cross-sections for community and rural areas, addressing the following factors as applicable: number of travel lanes, lane width, medians, drainage control, shoulder width, parking lanes, bike lanes, fire and emergency response standards, curb and gutter design, landscaped strip and sidewalk width. In general it is intended that roadway cross-sections in the county be as narrow as possible (particularly in community areas) while still meeting recommended safety standards and the requirements of the General Plan."
11. Circulation Element, Policy CI-4.3- The District recommends adding the following statement: Support existing and emerging technologies that reduce the emissions of criteria pollutants and greenhouse gases from goods movement activities at the Port of Sacramento, truck stops and loading terminals, airports and rail facilities.
12. Circulation Element, Policy Additions: The District recommends adding the following policy to the Circulation Element:

Policy CI-10.3: Coordinate with the Delta Protection Commission for the planning and development of Yolo County's portion of the proposed California Delta Trail System.
13. Conservation and Open Space Element, Section H – Air Quality, Implementation Plan, Action CO-A95 and A99: These action elements propose regulation of future development projects involving sensitive receptors based on their proximity to sources of toxic air contaminants (TAC) or nuisance sources. This situation would arise when new development projects are located in proximity to existing sensitive receptors or when a proposed project could introduce sensitive receptors near existing sources of TAC. The District would like to refer the County to our

Yolo-Zamora Citizens Advisory Committee General Plan Comments

Goal LU-A7

Confirm that "green buffer" can include agricultural and conservation lands. Define buffer boundaries between cities and unincorporated communities before implementation of general plan. Specifically, the committee would like to see a "green buffer" established between the Dunnigan development and rural Zamora residents.

Goal LU-A17

Need to define "significant" discretionary projects that would be brought before the local advisory committees. Recent experience with re-entry prison has left community skeptical that they will be consulted in advance of planning department recommendations and/or supervisor decisions.

Goal LU-A18

Community plans need to be developed before implementation of general plan proceeds.

Goal CI-1.3

Need more specific guidelines on how to fulfill commitment to reducing carbon imprint and improve transportation alternatives.

Goal LU-2

There is still no agreed upon map which distinguishes the boundaries between the unincorporated areas. These boundaries must be decided before general plan can be correctly applied and implemented. Note: A suggested map was submitted by this committee based upon existing fire, water, school and other boundaries:

Goal LU-2.1

Consider raising minimum agricultural buffer to 500 feet. 300 feet is not adequate to avoid city dweller complaints regarding smells and sounds of agricultural operations.

Goal LU - 4.2

Confirm plans to preserve water available for habitat and farming operations and that water cannot be diverted from habitat or farming operations to support housing or commercial development.

Goal CC-2.16

Need to confirm that "smart growth" standards include planning for schools.

Goal CC-2.12

Concern about target yield of 16 jobs per acre; needs to be more flexible for agricultural and ag-commercial development.

Goal CC-3.1

Request that the community plan for Yolo/Zamora be developed before projects in neighboring communities are authorized to move forward

Goal CC-3.5 through CC-3.12

Need to recognize that flooding and water runoff are of significant concern to "downhill" Zamora residents especially on road 91B. Understanding that the southern boundary of Dunnigan is tentatively described as Road 9/Bird Creek, there seems to be little, if any, control over channeling of the water under the railroad track. This causes current flooding which will only worsen with increased development. Location of any waste disposal operation is of significant concern.

Goal CC-3.15

Strongly recommend that road CR 14 be chosen over road CR 12 for ag-commercial development. Major differences exist in road connectivity, traffic and maintenance conditions and support. Road 12 is also home of native fox who raise their cubs in holes at intersection with 505 and of huge flock of swallows who return every year to nest under the overpass.

Goal CC-4.6

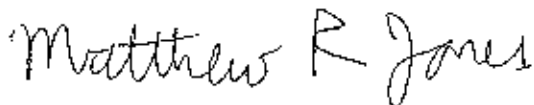
Request the planning process for Yolo/Zamora include evaluation of potential to construct micro-grid at road 14 and 505 to generate solar power for the community.

Handbook for Assessing and Mitigating Air Quality Impacts for more information on how to evaluate impacts resulting from the proximity of sensitive receptors to sources of TAC or nuisance.

14. Conservation and Open Space Element, Section H – Air Quality, Implementation Plan, Action CO-A96: The District would like to recommend that the Draft GP also include language encouraging implementation of Best Management Practices during construction activities.

In conclusion, the District appreciates receiving the Draft GP and the opportunity to provide the recommendations presented in this letter. The District appreciates the County's efforts to implement policies that will reduce Green House Gas emissions and Climate Change, as well as promote Green Building and Sustainability strategies in the plan. If you require additional information, please contact me at (530) 757-3668.

Sincerely,



Matthew R. Jones
Supervising Air Quality Planner, YSAQMD

80.

David Morrison

From: Mark Pruner [mark@markpruner.com]
Sent: Sunday, December 28, 2008 8:33 PM
To: David Morrison
Cc: Mike McGowan; Gail Klauer; 'Harold Shipley'; 'Mike Dutra'; 'John Robert Webber'; 'Richard Marshall'; Craig Hamblin; 'Richard Bagby'; mark@markpruner.com
Subject: Request to retain current General Plan designation for two Clarksburg Fire Protection District parcels

David, following up on the request I made at the last Clarksburg General Plan Committee meeting, with this email, and based on the unanimous affirmative vote of the commissioners of the Clarksburg Fire Protection District, I am asking that the new Yolo County General Plan retain the land use designation currently assigned to the two parcels owned by the Clarksburg Fire Protection District.

After deliberation and consideration, the District Commissioners have concluded that as part of the long range plans and mission of the District for construction of a new fire station, and the resulting increase in fire protection and emergency medical aid, would be set back if the District's two parcels are re-designated as public lands.

Thank you for your consideration David. Please let me know if you will grant the request of the District. Mark

Mark Pruner
Chair, Board of Commissioners
Clarksburg Fire Protection District
P. O. Box 3
Clarksburg, CA 95612
Cell: (916) 204-9097
Work: (916) 447-1121
Facsimile: (916) 447-9661

Heather Kearns

RECEIVED

Subject: FW: Blue Ridge Trail

OCT 15 2008

CLERK OF THE BOARD
OF SUPERVISORS

To: Yolo County Board of Supervisors
Blue Ridge Trail
Oct. 15, 2008

As a land owner and stake holder in the area at or near the proposed trail route I am opposed to the Blue Ridge Trail and would like to see the map depicting this trail and any specific language referring to it removed from the General Plan now under development. While I am opposed to this trail I do support hiking as an outdoor activity. Perhaps more general language encouraging future development of hiking venues when the opportunities arise, or similar language might better fit the scope of this plan. A reference to the recently developed Parks Plan may provide a greater level of detail if so desired.

The reasons for my opposition are many. First of all there is the issues of trespass and vandalism which would greatly increase with this much public presents in a narrow corridor this close to private property zoned AP. This has already happened in the area just to the west with the latest California Fish & Game purchase. Currently the land in this area is used mainly for cattle grazing. The revenue from grazing is marginal, but is the main source of money used to pay the County taxes. The injection of recreation into this fragile agribusiness climate would be extremely disruptive. Having said this I also feel that private property rights would be derogated by the change in property use not consistent with the surrounding current land uses. The current uses of this area are supposed to be protected under County Zoning Ordinances. I hope this would provide some level of protection for the historic use of this area.

Respectfully Yours

Gerald M. Hartwig

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cc: CAO, FPW

10/15/2008

(9)

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January 20, 2009

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JAN 20 2009

CLERK OF THE BOARD
OF SUPERVISORS

Yolo County Board of Supervisors
625 Court St.
Woodland, CA 95695

Chair and Members,

The Wild Wings sewer and water systems do not currently operate at full capacity, thus both systems have the ability to handle additional customers that are adjacent to the Wild Wings community. Acquiring an expanded customer base would serve to lower overall costs to our residents.

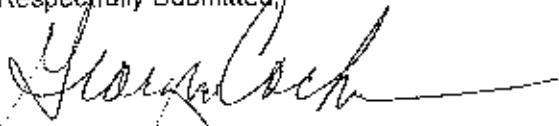
On October 21, 2008, the Yolo County Board of Supervisors approved an agenda item which approved the Wild Wings Community Services Area (CSA) 'looking at' additional hookups to the Wild Wings CSA sewer and water systems.

As the County begins the public hearing process of the General Plan, the Wild Wings CSA requests that your Board include language or guidance within the general plan that will allow additional hookups to both systems in the future. We want to ensure that any actions your Board takes related to the Yolo County General Plan do not outright prohibit additional hookups to our sewer and water systems in the future.

Our request is not intended to take any position related to future development or land use policy. We simply request that the Wild Wings CSA not be precluded by General Plan policy from furnishing sewer and water services to adjacent or close proximity properties, subject to the County's review and approval.

We hope that your Board will seriously consider this request when taking action related to the Yolo County General Plan.

Respectfully Submitted,



Wild Wings Community Services Area Advisory Committee

Rick Fenaroli, Chair

Tom Andringa, Vice-Chair

Greg Bloom

Georgia Cochran

Audra Hartman

on behalf of

cc: CAO, Co. Counsel, PPW

6

RECEIVED

JAN 21 2009

HERBERT BAUER, M.D.
831 OESTE DRIVE
DAVIS, CALIFORNIA 95616
(530) 753-2491

CLERK OF THE BOARD
OF SUPERVISORS
1-19-09

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Board of Supervisors
625 Court St.
Woodland, CA 95695

As reported in the news the Board is asking citizens for comments on plans to prepare for Yolo County's future. Availability of space for newcomers is often the main topic of discussion which it may remain to be. However, I suggest to broaden our goal by including human services such as food, shelter, education, justice. The purpose would be to set a period of time during which such basic services could be extended to all in case of proven need. A statistical guess would be needed to estimate the number of new residents who would live in our County within a predetermined ~~of~~ time. Social Services would determine how much it would cost per person to provide such services for those in need. Depending on the amount of money available to our treasury, it would be simple to figure out how many newcomers we could "afford". Emergency services would of course have to remain mandatory.

After obtaining the needed estimates the welcoming committee could visit every new family, welcome them to Yolo County and explain to them which services would be available to them in case of proven need. Part of the explanation would have to be, unfortunately, that no county services would be available until next budget hearings which would figure out how many people we can serve. The rest may have to depend on private charity or, brutally enough, "move out".

Such scheme would immediately be subject to criticism from two extreme sides: Some extremists would describe it as a typical communist plot where government dictates who is to live and who is to die; the other side of extremists would describe it as "opening the doors to swindlers who live on their neighbors' money without moving a finger". To the "middle" this may simply do the best we can. But it would at least guarantee that every child in our county can eat, sleep, and go to school.

In case this is too complicated, or too cruel, here is a much simpler way: Find out how much you need, then charge enough tax money to get it. Please forgive my treacherous thoughts! Our real goal: Care for all.

Most respectfully,

Herbert Bauer (10)

cc: CAO, Co. Counsel, PPW

JAN 22 2009

CLERK OF THE BOARD
SUPERVISORS

Yolo Audubon Society
P.O. Box 886 Davis, CA 95617



20 January 2009

Supervisor Mike McGowan, Chair
Yolo County Board of Supervisors
625 Court Street
Woodland, CA 95695

Subject: Further Comments, Biological Resources Section, Conservation and Open Space Element

Dear Supervisor McGowan and Board Members:

As the County continues on its journey toward a General Plan Update that addresses the needs and concerns of all members in the County's varied population, the current hearings on the draft policy documents represent a critical milestone. As you know, it is important that the Plan document address both the policy needs for current decision-making as well as allowing for future adjustments as additional information becomes available. This policy document is undoubtedly going to become a critical factor in County decision-making as the effects resulting from global climate change become more evident.

Owing to a lack of infinite time to review the documents in the proposed General Plan Update the members of the Board of Directors of the Yolo Audubon Society (YAS) are unable to affirm that the entire General Plan Update provides both the clear direction and future flexibility that would be desirable. However, based on a relatively thorough consideration of the revised policy framework in Section D (Biological Resources) of the Conservation and Open Space Element, the YAS believes that the draft currently before the Board of Supervisors (BOS) represents a significant improvement on the County's existing policy framework for biological conservation, and that the policy framework in this section provides a strategy that will help the Yolo County landscape meet regional needs for adapting to the impacts of changing climate. The YAS supports the (much-revised) draft policy framework and recommends its adoption by the BOS with minor adjustments.

The revised section incorporates a sophisticated understanding of the interrelationships among land use planning and conservation planning that was absent from earlier versions of this section. The revised section correctly identifies the need for a landscape-based conservation approach for the County, which explicitly also includes attention to similar elements in landscape areas adjoining the County, as well as focusing on regional conservation relationships that embody larger scales as well. The revised draft represents a planning job well done and the YAS applauds and complements County staff for this work.

Specific Comments

At the present time the YAS has only minor comments about a few policy elements in the Biological Resources section, as follows. Recommended deletions to current text are in ~~strike~~ suggested insertions are in **bold** text (underline is inserted text in current draft).

Policy CO-2.3 Preserve and enhance those biological communities that con-
county's rich biodiversity including blue oak and mixed or

cc: aen. co. counsel, FAW

Supervisor Mike McGowan, Chair

Yolo County Board of Supervisors

Subject: Further Comments, Biological Resources Section, Conservation and Open Space Element
20 January 2009

Page 2

native grassland prairies, wetlands, riparian **areas corridors**, aquatic habitat, agricultural lands, heritage valley oak trees, remnant valley oak groves, and roadside tree rows.

This recommended change (and the same change recommended in additional policies and actions below) stems from the potentially misleading emphasis that the word "corridor" inserts into a policy that we fully support. The issue arises because "riparian," which scientifically refers to the "edge of the waterbody," implies that the ecological value is present only when there is a "corridor," while the more valid concept is that the riparian area is an environmentally sensitive region for all aquatic features. By replacing the implication that the area adjacent to the water body must be part of a "riparian corridor" with the more valid concept of a "riparian area," the more valid concept is established in the policy that riparian protection extends to the edges of all aquatic features.

Policy CO-2.9 Protect riparian **areas corridors** to maintain and balance wildlife values.

The rationale for this recommendation was presented under Policy CO-2.3.

Policy CO-2.22 Prohibit development within a minimum of 100 feet from the **top of banks** for all lakes, perennial ponds, rivers, creeks, sloughs, and perennial streams. The setback will allow for fire and flood protection, a natural riparian area corridor (or wetland vegetation), a planned recreational trail where applicable, and vegetated landscape for stormwater to pass through before it enters the water body. **Exceptions to this action include irrigation pumps, roads and bridges, levees, docks, boat ramps, and similar uses, so long as these uses are sited and operated in a manner that minimizes impacts to aquatic and riparian features.**

The rationale for the recommendation to replace "corridor" with "area" was presented under Policy CO-2.3. The recommended policy addition is intended to clarify that the County supports certain relaxations of the streamside and riparian buffer protections in order to allow for necessary infrastructure, but that the County also expects that efforts will be made to design, construct, and operate human features within the areas covered by the exceptions in ways that avoid, reduce, and offset the impacts that result from the exceptions. Without the additional text, the "exceptions" in this policy allows projects of the types listed to be conducted without consideration of ways that their impacts may be mitigated, which is a bad policy framework for the County's General Plan. [The YAS does not support complete waivers from the riparian protection policies in the General Plan for public works and infrastructure projects or for other activities that can feasibly be conducted in ways that reduce impacts to these areas.]

Policy CO-2.26 Coordinate with local watershed **stewardship** groups including the Cache Creek Conservancy, Lower Putah Creek Coordinating Committee, Cache Creek Stakeholders Group, Sacramento River Area Conservation Forum, and the Yolo Basin Foundation, to identify opportunities for restoring or enhancing watershed instream and riparian enhance biodiversity.

It is unclear why the County's General Plan should identify several "watershed groups" that may or may not exist in future years, and which in any event do not fully encapsulate the list of watershed-based organizations that exist in Yolo County today. For example, Tuleyome is clearly another "watershed

stewardship group," and the National Audubon Society's Landowner Stewardship Program is another. The County's policy should stress simply that the County will work with all appropriate watershed stewardship organizations. The additional recommended text merely clarifies the focus of the interactions.

Policy CO-2.29 Roads and road-related structures (bridges, culverts, retaining walls, abutments, etc.) located in or near watercourses shall be placed, designed, built, and landscaped so as to minimize the impact to riparian corridors, including reducing erosion during and after construction, accommodating flood flows, and minimizing grading on slopes greater than 20 percent. (Restore deleted policy)

Policy CO-2.29 is included in the Draft Update with strikeout text, indicating a deletion, without an insertion to replace the deleted text. The YAS strongly requests that the deleted text (or text that accomplishes a similar result) be incorporated into the General Plan. Public works and infrastructure projects are among the most damaging actions that may be authorized for rivers, streams, and other aquatic features. The General Plan MUST provide guidance for County decision-makers that makes it clear that avoiding, reducing, and offsetting the impacts of public works and infrastructure projects is an expectation of County government.

Policy CO-2.35 Recognize, protect and enhance the habitat value and role of wildlife migration corridors for the Sacramento River, Putah Creek, Willow Slough, the Blue Ridge, the Capay Hills, the Dunnigan Hills and Cache Creek.

The general focus of this policy is exemplary, and the "landscape linkages" identified in the policy constitute some of the most important linkages in the County. However, from a conservation planning perspective the 21 percent of the County that is still primarily dominated by natural habitats is probably the most important conservation feature in the County's landscape. The inner Coast Range has been identified as an important landscape linkage (see URL: <http://www.calwild.org/linkages/index.html>). For Yolo County, this broad linkage corridor is the habitat conditions that exist along the axis of the mountains at the County's western edge.

Action CO-A27 Protect the habitat value and biological function of oak woodlands, grasslands, riparian areas corridors, and wetland habitats. Avoid activities that remove or degrade these habitats and establishment buffers to avoid encroachment into sensitive areas. (Policy CO-2.24, Policy CO-2.14, Policy CO-2.15, Policy CO-2.186, Policy CO-2.19, Policy CO-2.2038 through CO-2.24)

The rationale for this recommendation was presented under Policy CO-2.3.

General Comment Regarding Conservation Planning Framework and Climate Changes

The policy framework incorporated into the Biological Resources section of the Conservation and Open Space Element addresses the majority of the policy concerns that the YAS has previously identified for the General Plan Update process. The YAS largely agrees with the commentary in this section that

Supervisor Mike McGowan, Chair
Yolo County Board of Supervisors
Subject: Further Comments, Biological Resources Section, Conservation and Open Space Element
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indicates a need for a landscape-based approach as the County and its citizens begin to address climate change. As the text in this section says quite clearly under "Background Information," it is unlikely that anyone can predict accurately the changes that will occur in the County's ecological landscape because of climate change, and there is a real possibility that the recommended framework will not be enough to avert significant changes in this landscape. However, it is CERTAIN that we will not be able to address the changes if adequate conservation elements are not identified in the landscape as a consequence of this General Plan and the County's Habitat Conservation Plan/Natural Community Conservation Plan.

Policies recommended in the current draft (such as CO-2.1, CO-2.2, and particularly CO-2.3) represent key elements of an adaptive strategy for climate change. However, there is reason to believe that (because of the potential disruption of native habitats by climate change) conservation and adaptation to climate change will require an approach to landscape management on a broad scale that emphasizes the incorporation of "habitat elements" throughout the landscape. In this context, policies such as CO-2.17 and CO-2.18 assume a critical importance in allowing for landscape-scale adjustments. The YAS strongly supports the inclusion of this awareness into the County's Conservation Element.

Closing

Thank you for your ongoing consideration of the conservation importance of elements in the Yolo County landscape and the adaptive strategies that are needed in the General Plan for their conservation.

Please do not hesitate to contact me or any other member of the YAS Board if you have questions. We look forward to continued discussions about conservation in our home.

Sincerely,



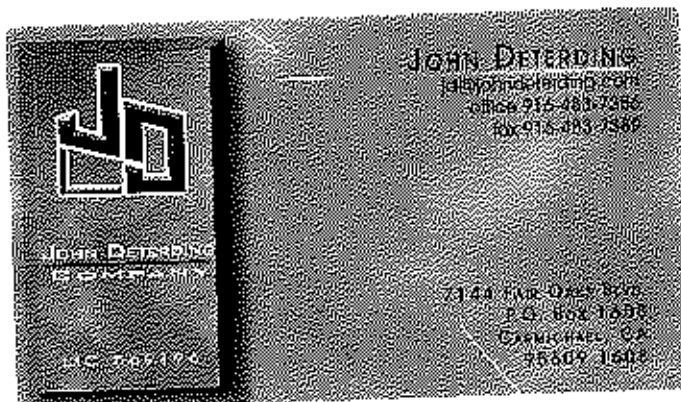
Chad Roberts
Conservation Chair

JAN 22 2009

CLERK OF THE BOARD
OF SUPERVISORS

County of Yolo Draft 2030 Countywide General Plan: 70 Acre Light Industrial Site in Esparto (APN #s 049-110-18, 19 and 20)

- The Yolo County BOS instructed staff on July 17, 2007 to "re-designate" this current 70 acre light industrial site in the preferred land use alternative of the General Plan update as "mixed commercial and residential uses". Staff has misinterpreted the instruction of the BOS in our view and has instead proposed a rigid designation of 10 acres of Commercial General, 35 acres of Residential and 35 acres of Open Space for a total of 80 acres, inclusive of the subject 70 acre site.
- We believe the intent of the BOS was in concert with our request at the July 17, 2007 meeting, that this area would have a designation that would allow flexibility of use under a General Plan designation of "Mixed Use-Commercial/Industrial and Residential". We request that the designated use for the subject property provide the intended and needed flexibility to respond to the market without triggering a future General Plan Amendment. We respectfully request that a Mixed Use-Commercial/Industrial, Residential designation be assigned to the subject property with the flexibility that up to 70% of the site can be utilized for any of the allowed uses. We further suggest that the environmental assessment for the site included in the General Plan evaluate a potential use for the site that is one-third each allowed use.
- Staff has applied an Open Space requirement (35 acres out of 70 total) driven by Agricultural Buffer requirements on the subject Property that is being applied to "new urban development" in the General Plan Update. This approach is entirely inappropriate for this Property as it is currently zoned for Light Industrial use and therefore is not "New Urban Development designation". The subject Property should only be required to meet the County's current Agricultural Buffer requirements, which provide more flexibility and broader options.
- If the Mixed Use-Commercial/Industrial, Residential land use designation outlined here cannot be accommodated in the General Plan Update we would prefer to retain the existing zoning for the property and be excluded from any changes currently contemplated by the General Plan Update.



cc: CAO, Co. Counsel, PPW

(12)

1. A Specific Plan/CEQA formulation for the 70 acre property would run \$250,000 to \$350,000 and take 18 to 24 months at a minimum. Current economic conditions do not allow this type of additional investment for this property. Additionally it is highly probable that the ultimate use of the property will not match whatever plan we conceive at this point in time anyway. All of our crystal balls are a bit fuzzy at this juncture. This would then likely still result in future revisions and reassessments of whatever plan we would conceive now.
2. We can address any concerns about compatibility of uses through a site plan review and approval process when we are dealing with concrete proposals. Neither I, Yolo County nor the marketplace is interested in poorly planned development.
3. We feel it is in the best interests of Yolo County and landowner to have maximum flexibility for development of the subject property so we can respond positively and quickly to development opportunities that will come to us in the future. The requested land use designation provides what is needed.



YOLO COUNTY FARM BUREAU

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CLERK OF THE BOARD
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GENERAL PLAN COMMENTS

- I. We have surveyed our membership and received good feedback on the General Plan (show surveys)
- II. We appreciate the efforts Yolo County has made over the years to preserve agriculture. We also support many policies and actions of the General Plan, such as:
- A. We support Policy AG-1.6 to mitigate at a ratio of no less than 1:1 the conversion of farm land to urban uses
 - B. We support Policy AG-2.14 recognizing the valuable role agriculture plays in mitigating the effects of climate change
 - C. We support Policy AG-3.4 recognizing and protecting agricultural infrastructure
 - D. We support Policy AG-3.5 encouraging permit streamlining for farm worker housing
 - E. We support Policy AG-3.6 encouraging cities to share in responsibility for farm worker housing
 - F. We support Policy AG-3.15 providing technical and educational support for farmers
 - G. We support Policy AG-A13 reducing development restrictions for agricultural processing facilities
 - H. We support Policy ED-1.3 encouraging services that support farming
 - I. We support Policy ED-1.4 encouraging high-speed telephone and internet services throughout the county
 - J. We support Policy ED-1.5 to expand the economic potential of the port
 - K. We support Policy ED-2.2 to bring together community and outside resources to attract and expand businesses
 - L. We support Policy ED-3.2 to support infill development
 - M. We support Policy ED-4.2 to bring more destination spending to Yolo County
 - N. We support Action ED-A2 to provide incentives for targeted businesses and infill development
- III. We do have some significant concerns
- A. We are concerned about policies like AG-3.1 or ED 1.13 on Ag Districts. We believe agriculture would be better served if the benefits of Special Districts were applied throughout the county
 - B. We are concerned about policies and actions like AG-1.7 and AG-A6, that place home site restrictions on agricultural property. In 2005 we mailed a survey to voting members. The majority did not want to home site restrictions dictated. Perhaps this can be accomplished with

incentives, such as reduced fees. Any easements should be encouraged through incentives as well.

- C. We appreciate the stakeholder process the county has undertaken to explore the groundwater ordinance, transfer tax and a county water agency. We think policies like AG 1.22 and 2.4, and CO 5.1, 5.3, 5.5, 5.6, 5.10, and 5.14, which make assumptions about the outcome of this process are premature.
 - D. We are concerned about policies like AG-2.4 and 2.14 which dictate Best Management Practices. We believe that growers are the best judge of management practices in their agricultural operations.
 - E. We are also concerned about reference to the Snow Mountain National Conservation Area in the Blue Ridge Berryessa Trail. We believe this concept has not been thoroughly vetted. Many negative impacts to agriculture such as cutting fences, liability, and harm to livestock and negative impacts to the environment they are trying to preserve need to be discussed before we endorse these projects.
- IV. We look forward to working with the Board to help find a solution to the possible loss of Williamson Act funding. We believe we can work together to minimize the impacts to the county while maintaining our agriculture.
- V. We also look forward to working with the Board to address the massive conversion of ag land to habitat in the Clarksburg area as a result of efforts in the Delta. We believe we can work together to minimize impacts to agricultural infrastructure and crops.