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November 20, 2008

Via Fax and U.S. Mail

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

Re: Notice of Preparation - Draft Yolo County General Plan

Dear Mr. Morrison

On behalf of Conaway Ranch, we offer the comments set forth below on the Notice of Preparation (NOP) for the draft Yolo County General Plan.

**Objectives 8.5**

Prior to calling for a countywide water authority to address water conservation, flood control, water conveyance and water exports, the draft EIR should analyze the existing agencies, service providers, stakeholders and collaborative efforts that are actively involved in addressing the issues identified in this objective and the ability of these agencies, groups and efforts in effectively protecting the interests of the County relative to these issues. The draft General Plan and the draft EIR and its proposed mitigation measures should be evaluated in light of the existing policies of other local public agencies and avoid unnecessary duplication of effort and authority.

**Land Use**

Policy LU-2.3: The Conaway Ranch, likely similar to other farms in the County, have existing or evidence of past structures that have been used for residential purposes and may be located on parcels of less than 20 acres. The draft EIR should evaluate the potential environmental effects resulting from any prohibition against updating and utilizing such structures for residential purposes and the increase in pressures to allow new subdivision of agricultural lands for residential purposes. The extent to which underutilized or antiquated housing stock can be improved to provide housing for farming families and employees, it should be encouraged by the General Plan as a beneficial effect to the provision of housing in the County and an efficient use of the County's existing assets.

### **Solid Waste and Recycling**

Action PF-A62: The draft EIR should analyze impacts to existing farming operations and agricultural production resulting from attempts of the landfill to control agricultural crops grown lands surrounding the County's landfill. The responsibility of insuring land use compatibility between the landfill and its surrounding landowners is the responsibility of the landfill. The draft EIR should analyze the status and effectiveness of implementation by the landfill of its existing mitigation obligations prior to imposing restrictions on adjacent land uses. To the extent that there are existing mitigation measures that inadequately protect surrounding landowners from impacts of the landfill, this fact should be disclosed. Additionally, proposed General Plan policies should require the landfill to take whatever corrective are necessary to operate so as not to limit the agriculture or agricultural related uses on surrounding properties. To do otherwise, is inconsistent with General Plan Objective 7.7 and the protection of agriculture in the County.

### **Agricultural and Economic Development**

Action AG-A11: Greater detail should be provided on what exactly a "special area plan to govern land use management" in the Yolo Bypass would entail. With a more detailed description of the plan, the draft EIR should analyze the consistency of such a plan with other federal, state, regional and local regulatory structures controlling land use in the bypass.

### **Conservation and Open Space**

Action CO-A92: The draft EIR should disclose existing ongoing efforts within the County by other agencies, organizations and stakeholders to address water conservation, flood control, water conveyance and water exports. The document should evaluate the consistency of the stated General Plan policy with those ongoing efforts.

### **Health and Safety**

Action HS-A14: The draft EIR should analyze the technical justification for prohibiting any new water wells within 500 feet of the toe of any flood control levee. Such a prohibition may have a significant impact on effective farming irrigation practices.

Action HS-A35: Similar to comment on Action CO-A92 above, the draft EIR should disclose existing ongoing efforts within the County by other agencies, organizations and stakeholders to address flood control and protection. The document should evaluate the consistency of the stated General Plan policy with those ongoing efforts.

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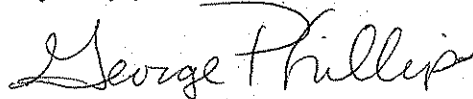
The County, in concert with other such agencies, organizations and stakeholders, should together take an aggressive stance toward flood protection in the County and how such protection is affected by other State and/or regional agencies, e.g., the Sacramento Area Flood Control Agency (SAFCA). Specifically, the draft EIR should analyze the impact of SAFCA's Natomas Levee Improvement Plan (NLIP) and its impacts on and consistency with the draft General Plan. Policies addressing the establishment of flood standards equivalent to acceptable levels of service should be incorporated into the General Plan to provide guidance to the County and other Yolo County agencies, organizations and stakeholders in evaluating the potential environmental impacts to Yolo County residents of flood control projects proposed by others.

Please provide notice of all future matters relating to the County's General Plan, including but not limited to the availability of related documents and of upcoming hearings, to the undersigned and those individuals listed below.

Conaway Preservation Group  
45332 County Road 25  
Woodland, CA 95776  
Attn: Tovey Giezentanner, President  
Regina Cherovsky, Operations Manager

Thank you for the opportunity to comment.

Very truly yours,



George E. Phillips *(JB)*

cc: Tovey Giezentanner  
Regina Cherovsky