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At the regular March meeting, the North Coast Advisory Council, we reviewed comments on the Conservation and Open Space Element made by our COSE committee. The council voted unanimously to endorse and submit all of the comments you will read here. Following the COSE committee's endorsed comments are nine comments voiced by individuals (members of the general public and the council) during the discussion. Those comments are also endorsed by the council, by majority vote.

**COMMENTS OF PARTICULAR NOTE:**

The document creates an lengthy list of goals policies and strategies, but failsto fulfill the reasons given for consolidation of the elements it includes:

1. to make them easier to use;
2. to eliminate redundancy and maintain consistency;
3. to group like policies for emphasis; and
- 4. to address related community issues more comprehensively in one element.

Strong support of Ag community's position for separation of Open Space and Agriculture Elements

Concerns about contradictory or inconsistent priorities, policies, goals or strategies throughout the document.

Complete silence on the issue of population growth - one of the driving motivations for protections.

Collaboration and cooperation implementation strategies are required to achieve nearly every goal, yet few strategies are outlined and no evidence of input from the cooperating agencies can be found. One standout: is in the Water Resources Chapter: County's limited authority to implement water goals and policies.

**OVERVIEW/GENERAL COMMENTS**

The overall organization of the document (starting with Goals and the Policies that reflect them and ending with Implementation Strategies) is strong and conceptually sound. However, some strategies are too vague to be useful and others are too specific to be flexible and word choices are haphazard to poor in places where framing is critical.

Examples of too vague: pp 2.17 "Regularly monitor, measure, and report on the implementation status of the Climate Action Plan and adapt strategies to reduce greenhouse gas emissions over time.

Too specific: Implementation Strategy AQ 1.1.1 Encourage new residential development to be within walking distance (1/2 mile or less) to public activity centers such as schools, libraries, parks, and community centers. (E2)

## North Coast Advisory Council Comments on the Conservation and Open Space Elements

### **NO AGRICULTURE IN COSE**

No policy regarding agriculture should be included or implemented in the COSE. Conservation of agricultural resources is addressed in the Agriculture Element, along with the rest of county policies regarding Agriculture. References to agriculture in COSE should directly refer to that element. Examples: page 7.2 “Managed production of resources for agricultural lands is addressed in the Agriculture Element, and outdoor recreation is addressed in the Parks and Recreation Element.” page 7.9 “Because open space resources do not follow man-made boundaries, they occur on both public and private lands. Therefore, the following goals and policies in this chapter refer to the treatment of open space resources on public lands and on private non-agricultural lands.”

page 10.2: “At the same time, groundwater supplies will need to be protected for agriculture in accordance with the Agriculture Element.”

### **UNDERSTANDING OF ENVIRONMENT AND HABITAT**

“Sustaining healthy ecosystems, preserving biodiversity and protecting diverse landscapes ensures a future that is healthy and vibrant ecologically, socially, and economically. Changing land uses, particularly converting of agricultural and rural lands to residential and urban uses, adversely impacts wildlife and native species. Such changes often fragment habitats, reduce biodiversity, increase pollutant loads, and increase flooding.” (1.13) Humans are not completely independent of the ecological system and we could benefit from integrating humans into the concept of "habitat" instead of viewing "the environment" as something apart and in competition with humans.

### **SILENCE ON POPULATION GROWTH**

“Sustaining healthy ecosystems, preserving biodiversity and protecting diverse landscapes ensures a future that is healthy and vibrant ecologically, socially, and economically. Changing land uses, particularly converting of agricultural and rural lands to residential and urban uses, adversely impacts wildlife and native species. Such changes often fragment habitats, reduce biodiversity, increase pollutant loads, and increase flooding.” (1.13) In 1957, Julian Huxley, an English scientist, wrote in a book on morality: Our biggest problem is population. This document does not address that crucial issue, but it should, perhaps here in the general introduction. Policies are needed because population growth will continue to put pressure on our limited resources and more and more force us to make difficult choices and set priorities that reflect the control we have over our impact on our surroundings.

### **TECHNICAL CORRECTIONS**

“The open space chapter addresses issues of special importance to open space and other resources, such as agriculture.” (1.14)

“The open space chapter addresses issues of special importance to open space and other resources, ~~such as agriculture.~~”

“The State standard for particulate matter (PM10) is violated several times through out the year, resulting in the County’s nonattainment status with the State’s PM10 standard.” (2.3) PM10 is no longer considered an adequate measurement or standard for particulate pollution. Current measurement is PM2.5.

Table at end of Air Quality:

AQ 1.7.3 should be 1.7.2 (Typo?)

AQ 4.2.7 referenced in Table, but not in document.

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**AIR QUALITY GOALS AND POLICY AREAS**

Priority time frames for implementation need to be reviewed for consistency. For Example: AQ 1.7 “Bicycle and pedestrian travel” given “low” priority, whereas AQ 2.2 “Reduce vehicle trips” given “high” priority.

AQ 4.4.4 rated “High.” The similar AQ 2.3.1 rated “Medium.” Why not consolidate these strategies?

AQ 4.2.6 This “strategy” is similar, or equivalent to AQ 4.2.5 but is regarded as an “essential” priority unlike the “medium” assigned to AQ 4.2.5.

**AIR QUALITY GOALS AND POLICY AREAS**

*POLICY AQ 1.2 REDUCE VEHICLE MILES TRAVELED*

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

Great idea: increase bicycle accommodations while reducing vehicle parking.

**AIR QUALITY GOALS AND POLICY AREAS**

*POLICY AQ 1.3 CONVENIENT ALTERNATIVE TRANSPORTATION*

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

**AIR QUALITY GOALS AND POLICY AREAS**

*POLICY AQ 3.7 REDUCE VEHICLE IDLING*

“Encourage the reduction of heavy-vehicle idling throughout the county.”

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

**AIR QUALITY GOALS AND POLICY AREAS**

*POLICY AQ 4.2 MITIGATE GREENHOUSE GAS EMISSIONS*

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

This is given a “medium priority and 2010 time frame.” Should be “High” and “Immediate.”

**BIOLOGICAL RESOURCE GOALS AND POLICY AREAS**

*POLICY BR 4.7 CONTAMINATION FROM PESTICIDES*

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

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

**BIOLOGICAL RESOURCE GOALS AND POLICY AREAS**

*GOAL 5: WETLANDS WILL BE PRESERVED.*

BR 5.1.2. states “where avoidance of wetlands is not possible require the provision of replacement habitat onsite through restoration and/or habitat creation, provided that no net

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loss of wetland area, wetland function, and habitat values occurs. When on site wetland mitigation is not feasible, provide for offsite mitigation...is not feasible.”

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

### **BIOLOGICAL RESOURCE GOALS AND POLICY AREAS**

#### *POLICY BR 7.3 AGRICULTURAL BEST MANAGEMENT PRACTICES*

“Support agriculturalists and other landowners that participate in education and assistance programs and other voluntary and cooperative programs that encourage sustainable land management practices (Best Management Practices) that reduce erosion, sedimentation, and nutrient levels in coastal watersheds.”

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

### **CULTURAL RESOURCES GOALS AND POLICY AREAS**

#### *“GOAL CR 4 THE COUNTY’S KNOWN AND POTENTIAL ARCHAEOLOGICAL AND PALEONTOLOGICAL RESOURCES WILL BE PRESERVED AND PROTECTED.*

#### *POLICY CR 4.1 NON-DEVELOPMENT ACTIVITIES*

Discourage or avoid activities, other than development, that could damage or destroy archaeological sites, including off-road vehicle use on or adjacent to known sites. Prohibit unauthorized collection of artifacts.” 4.10

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

### **ENERGY RESOURCES GOALS AND POLICY AREAS**

#### *POLICY E 1.5 WASTE BURNING*

“Encourage waste-burning biomass facilities as a method of producing electrical energy where environmental and air quality impacts can be mitigated and the facility is compatible with adjoining uses.”

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

### **ENERGY RESOURCES GOALS AND POLICY AREAS**

#### *GOAL E 5 RECYCLING, WASTE DIVERSION, AND REUSE WILL BE INCREASED. 5.15*

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

### **ENERGY RESOURCES GOALS AND POLICY AREAS**

#### *GOAL E 5 RECYCLING, WASTE DIVERSION, AND REUSE WILL BE INCREASED. 5.15*

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

### **ENERGY RESOURCES GOALS AND POLICY AREAS**

#### *“POLICY E 5.3 BIOMASS AND COMPOSTING*

Encourage biomass, green waste, and food waste composting facilities (agricultural, residential, food service, commercial, industrial.)” 5.16

Good idea and necessary.

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**ENERGY RESOURCES GOALS AND POLICY AREAS**

*“GOAL E 7 APPROPRIATE ENERGY FACILITY DESIGN, SITING, AND OPERATION WILL BE ENSURED.*

Implementation Strategy for siting facilities: Employ the best reasonably achievable techniques available to mitigate impacts to environmentally sensitive areas such as wetlands, animal or bird refuges, or habitat of species of special concern. Avoid impacts to habitat of rare, threatened, or endangered species.” 5.19

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

**OPEN SPACE RESOURCES AND POLICY AREAS**

SUGGESTION FOR MAJOR CHANGE IN ORGANIZATIONAL STRUCTURE OF THIS CHAPTER

Goal 1 seems to try to encompass too much.

Goals 2, 3, and 4 are essentially implementations of Goal 1.

A reexamination of this chapter might yield a more clear set of policies that address the stated issues with a toolbox of strategies for expressing those policies. Perhaps this could be organized by ownership category and/or by its designation (recreation, public access, habitat preservation, visual resource preservation, etc)

The main policy seems to be maintaining the open space that does exist and ensuring development is within or contiguous with lands already developed (closed space?). How that policy is implemented depends almost entirely on the property owner. When the lands are not publicly owned, non-ag open space is subject to development standards of the general plan.

**OPEN SPACE RESOURCES AND POLICY AREAS**

*“GOAL OS 4 URBAN SPRAWL AND INAPPROPRIATE DEVELOPMENT OF RURAL AREAS WILL BE PREVENTED.”*

Revision Suggestion

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

**OPEN SPACE RESOURCES AND POLICY AREAS**

*“POLICY OS 2.11 RECREATIONAL USE OF PUBLICLY-OWNED OPEN SPACE*

*Continue to establish and implement policies and management strategies to provide recreational use of open space. 7.21*

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

**OPEN SPACE RESOURCES AND POLICY AREAS**

*“POLICY OS 4.7 EXPANSION OF URBAN/VILLAGE AREAS: LOCATION*

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

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

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**WATER RESOURCES GOALS AND POLICY AREAS-- MAJOR ISSUES**

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

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

**WATER RESOURCES GOALS AND POLICY AREAS**

*“and conserving the water resources we currently use.”* 10.2  
more efficient use of our water resources. (Conservation is what you do when you are experiencing drought and must reduce your water use. Efficient use of water is the goal to work toward- eliminating waste of water through careless or reckless use and leaks.)

**WATER RESOURCES GOALS AND POLICY AREAS**

*“Securing adequate water supply for all beneficial uses, especially agricultural land uses, is a priority of the General Plan.”* 10.3  
Why “especially Agricultural land uses”? Are these more threatened than other beneficial uses? They may be considered more important beneficial uses, but if they are not more threatened, this parenthetical phrase is unnecessary and seems platitudinous.

**WATER RESOURCES GOALS AND POLICY AREAS**

*“Strategic growth principles call for redirecting development from areas that rely on groundwater to urban areas served by surface water in order to protect groundwater for agriculture.”* 10.3  
Groundwater is unmonitored and a one-size-fits-all policy may be inappropriate, since some lands with ag uses have riparian rights that already supersede other priorities.

**WATER RESOURCES GOALS AND POLICY AREAS**

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

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

Water demand management should be recognized as an alternative water source.

**WATER RESOURCES GOALS AND POLICY AREAS**

*GOAL 1 THE COUNTY WILL HAVE A RELIABLE AND SECURE REGIONAL WATER SUPPLY (IRWM). pp10.5*

*POLICY WR 1.2 EXPAND DESALINATION OPPORTUNITIES*

Support the expansion of desalination opportunities (IRWM). Desalination projects will balance water supply needs with potential effects on biological resources, especially marine resources. Desalination projects will be powered by non-fossil fuel sources where feasible.

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

### **WATER RESOURCES GOALS AND POLICY AREAS**

*DESALINATION "IMPLEMENTATION STRATEGY WR 1.2.3 CONTINUE TO IDENTIFY POTENTIAL PARTNERS FOR DESALINATION PROJECTS." 10.6*

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

### **WATER RESOURCES GOALS AND POLICY AREAS**

*POLICY WR 1.6 AGRICULTURAL OPERATIONS*

"Groundwater management strategies will give priority to agricultural operations. Protect agricultural water supplies from competition by incompatible development through land use controls." 10.8

Where land is not zoned ag, this makes little or no sense. Where it is zoned for ag, it would be subject to the policies of the Ag element. This doesn't seem appropriate for this element and offers only vague definitions. Is groundwater management a county responsibility or water agencies or state? A balanced approach that recognizes efficiency and reduced withdrawals as beneficial for instream uses. Inconsistencies in groundwater management and priority of use to ag, who are often not served by agencies. Costs of groundwater basin studies can be prohibitive.

### **WATER RESOURCES GOALS AND POLICY AREAS**

*"POLICY WR 1.11 IMPACTS OF NEW DEVELOPMENT IMPLEMENTATION STRATEGY WR 1.11.2*

Require applications for land divisions that would increase density or intensity in groundwater basins with recommended or certified Levels of Severity II or III (for water supply or water systems) and are not in adjudication to include a water supply assessment (WSA) prepared by a public water supplier (as defined by California Water Code Section 10617). The WSA should:

- a. Determine whether the total projected water supplies for the project during the next 20 years will meet the projected water demand associated with the proposed project, in addition to existing and planned future uses, including agricultural uses.
- b. If water supplies will be insufficient, the WSA should include the water purveyor's plans for acquiring additional water supplies." 10.9

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

### **WATER RESOURCES GOALS AND POLICY AREAS**

*POLICY WR 1.13 AVOID NET INCREASE IN WATER USE*

Avoid a net increase in non-agricultural water use in groundwater basins that are certified as Level of Severity II or III for water supply. Place limitations on further land divisions in these areas until plans are in place and funded to ensure that the safe yield will not be exceeded. (GM5 revised)

No Implementation strategies robs this policy of any power. .

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**WATER RESOURCES GOALS AND POLICY AREAS**

*“GROUNDWATER MONITORING AND MANAGEMENT GOAL 2 THE COUNTY WILL MANAGE GROUNDWATER RESOURCES TO ENSURE SUSTAINABLE SUPPLIES FOR ALL BENEFICIAL USES.*

Develop groundwater management plans for each of the county’s groundwater basins and collaborate with overlying users in the development of management plans. “

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

**WATER RESOURCES GOALS AND POLICY AREAS**

*“GOAL WR 4 PER CAPITA POTABLE WATER USE IN THE COUNTY WILL DECLINE BY 20 PERCENT BY 2020.” 10.15*

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

This is a major contradiction.

**WATER RESOURCES GOALS AND POLICY AREAS**

*“GOAL WR 4 PER CAPITA POTABLE WATER USE IN THE COUNTY WILL DECLINE BY 20 PERCENT BY 2020.” 10.15*

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

**WATER RESOURCES GOALS AND POLICY AREAS**

*IMPLEMENTATION STRATEGY WR 4.1.3*

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

Repeated policy (WR 1.4 Interagency projects)

Gathering the current conservation programs from water purveyors might be a good place to start.

**WATER RESOURCES GOALS AND POLICY AREAS**

*“POLICY WR 4.3 THE COUNTY WILL BE A LEADER IN WATER CONSERVATION EFFORTS.” 10.16*

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

**WATER RESOURCES GOALS AND POLICY AREAS**

*“POLICY WR 4.6 ENCOURAGE THE USE OF GRAYWATER SYSTEMS, RAINWATER CATCHMENTS, AND OTHER WATER REUSE METHODS IN NEW DEVELOPMENT AND RENOVATION PROJECTS, CONSISTENT WITH STATE AND LOCAL WATER QUALITY REGULATIONS.*

*IMPLEMENTATION STRATEGY WR 4.6.1 DEVELOP AND ADOPT A GRAYWATER ORDINANCE AND PROGRAM TO FACILITATE THE REUSE OF DOMESTIC WASTEWATER FOR ONSITE IRRIGATION AND OTHER WATER CONSERVATION MEASURES AS APPROPRIATE.” 10.17*

Good start, but strategy only includes greywater, not rain catchment, or other systems.

Implementation doesn't require reinventing the wheel, but should include cooperation with

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local water agencies, plumbers, contractors and developers. Incentives for these types of efficiencies.

### **WATER RESOURCES GOALS AND POLICY AREAS**

*"POLICY WR 5.2 CLIMATE CHANGE THE COUNTY WILL CONSIDER ONGOING RESEARCH ON LONG-TERM CHANGES IN CLIMATE AND PRECIPITATION PATTERNS IN THE COUNTY AND REGION IN ITS APPROACH TO MANAGING WATER RESOURCES." 10.19*

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

Water Resources Goals and Policy Areas

*FLOOD CONTROL GOAL 6 DAMAGE TO LIFE, STRUCTURES AND NATURAL RESOURCES FROM FLOODS WILL BE AVOIDED.*

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

From THE IMPACTS OF SEA-LEVEL RISE ON THE CALIFORNIA COAST, Pacific Institute March 2009 - Federal flood insurance maps should include information on future flood risks due to sea-level rise. The Federal Emergency Management Agency's official flood insurance studies show hazard zones that reflect past or present flood risks. Because these are the de facto planning documents used by most local governments, they should be updated to show the future hazard areas and include the current science on climate change and sea-level rise.

Air Quality Goals and Policy Areas

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

### **ADDITIONAL COMMENTS FROM THE COMMUNITY**

Below are additional comments voiced at the meeting by the public and individual council members and endorsed by majority of the Council. With the exception of the general comments, they all point to policies that should be considered and included in the COSE, but currently are not.

#### **GENERAL:**

- It is not based on current mapping or data. In some cases the mapping is out-of-date or non-existent.
- Overwhelming support for separation of open space and agriculture elements.

#### **IN AIR QUALITY:**

- There is no policy on wood burning.
- Misunderstanding of controlled burns as a preventative measure. (See table below.)

Emission Source	PM (tpy)	PM10 (tpy)	PM 2.5 (tpy)
Wild fires	3292.32	306.81	956.4
Waste Burning and Disposal (Controlled burn)	35.0	34.4	32.1

- No policies regarding threats to air quality of off-road vehicles, lawnmowers, blowers, water boats, tractors wildfires and controlled burns.

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**IN BIOLOGICAL RESOURCES:**

- No policy regarding removal or protection of native vegetation.
- Marine Resources are not included.

**IN OPEN SPACE:**

- Support was expressed for the TDC Program

**IN WATER RESOURCES:**

- No policy on contamination from mercury mines.

As it stands, this is a very complex set of policies that did not achieve the benefits being combined. They were combined to make them easier to use; to eliminate redundancy and maintain consistency; to group like policies for emphasis; and to address related community issues more comprehensively in one element. Instead, the draft is unwieldy and overly complex and redundant. There are some positive notes and quite a few indications of how far we have yet to go.

The North Coast Advisory Council appreciates the opportunity to provide comments from our community on these important policies.

A handwritten signature in black ink that reads "Amanda Rice". The signature is fluid and cursive, with the first name "Amanda" and last name "Rice" clearly distinguishable.

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cc: Bruce Gibson, Supervisor, District 2  
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