

**CONSERVATION AND OPEN SPACE ELEMENT
PUBLIC DRAFT REVIEW
ALAB Comments – March 2, 2009**

BIOLOGICAL RESOURCES

Page 3.1 Introduction, last sentence: “ ...and as food for ~~man~~ humans and animals.

Page 3.3 First paragraph: “ ...controlling flooding, and maintaining a ~~high~~ reliable water table...”

Add: The importance of wetlands has long been recognized in the county General Plan. Recognizing the significant reduction of wetlands and wetland functions that has occurred over time throughout the county from development, grading, agriculture and conversion of land uses, it is all the more important to preserve the county’s remaining wetlands – and the valuable ecological services they provide.

Page 3.4-3.5 Major Issues Section

- 1) Integrated Management approach. ...coordinated and integrated identification and management of the County’s biological resources by the public and private sector, nonprofit organizations, and private landowners, including agriculturalists at both the ecosystem and site-specific scale levels.
- 2) Land use conversion. ...rural lands to intensive ag uses, residential and urban uses
- 4) Oak woodlands. ...due to tree cutting, urban land conversion....
- 5) Wetland habitats. ...streams ...
- 6) Fisheries. ...vulnerable to degraded habitat from decreased flows, polluted runoff...

Page 3.9 GOAL 1 - Native habitat and biodiversity will be protected and enhanced

Policy BR 1.1agencies, and 3) support programs and organizations focused on the acquisition and of fee title or conservation easements from willing landowners to ensure the long term management of open space and agricultural lands identified to encompass resources such as important natural habitats, wildlife corridors and special-status species in order to ~~that~~ provide for permanent protection of those important resources.

Add:

- Implementation Strategy BR 1.1.1

The county will engage with conservation organizations working in the county to encourage a strategic and coordinated effort among them to identify their priorities for conservation projects and to determine the type of projects that are most closely aligned with the mission and goals of those organizations.

- Implementation Strategy BR1.1.2

The county will engage conservation organizations, estate planning professionals, appraisers, charitable foundations and other funders (Community Foundations?), and others in an effort to develop and disseminated information to landowners about the financial implications of conservation transactions.

Policy BR 1.2 Limit Development Impacts

Add:

- Implementation Strategy BR1.2.1
The county will compile available data on the status and location of those resources and work closely with state and federal trustee agencies to identify appropriate regulatory strategies for limiting development impacts.
- Implementation Strategy BR1.2.2
The county will develop informational materials that will be made available to landowners and their agents and consultants to explain specific regulatory strategies that may limit or prohibit certain types of development – or require additional mitigation – in areas of the county where essential habitat for special-status species, sensitive natural communities, wetlands, coastal habitat, and riparian habitats occur.

Policy BR 1.3 Environmental Review

Add:

- Implementation Strategy BR1.3.1
The county will ensure that pre-application meetings and other communications with applicants whose proposed projects are in areas of the county where essential habitat for special-status species, sensitive natural communities, wetlands, coastal habitat, and riparian habitats occur will include explanations and information about all specific regulatory strategies that may either limit or prohibit the scope and type of development allowed, or require additional mitigation.

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Policy BR 1.6 Ecosystem Management ... the public entity leasing the land will ~~establish management strategies as terms in the lease,~~ as a condition and terms of the lease, develop and implement a management plan which includes measurable outcomes and evaluation mechanisms to ensure continued compatibility between sensitive resources and agricultural uses.

Add:

- Implementation Strategy BR 1.6.1
The county will work with the Resource Conservation Districts and state and federal public trust agencies to develop standards for lease conditions and terms to be used when sensitive resources occur on county-owned lands to be leased for agricultural purposes.

Policy BR 1.7 Ecosystem Education ... support the education of the public, especially private landowners and the agricultural and tourism industries, about the importance and benefits of...

Add:

- Implementation Strategy BR 1.7.1
The county will work collaboratively with business, tourism, conservation and environmental organizations to identify a source of funding to prepare a series of informational brochures regarding ecosystem function, wildlife corridors, special-status species, sensitive natural communities, wetlands, coastal habitat, riparian habitats, and ecotones- and the benefits associated with their conservation- for

distribution throughout the county at county offices, Chambers of Commerce, and other locations.

Page 3.13 Policy BR 1.11 Protect Wildlife Nursery Areas and Movement Corridors
This section states: “Identification of these areas (nursery areas and movement corridors) will not interfere with agricultural uses or private lands.” (AGP 29)

Page 3.14 Implementation Strategy BR 1.15.2
Require preconstruction surveys, conducted using specific protocols as identified by the county in coordination with state and federal public trust agencies, where development is proposed in sensitive habitat areas during the nesting season ~~in order to protect nests in active use~~

BR 1.16 Land Acquisitions.

Add: “Continue to work with willing sellers to acquire....”

- Implementation Strategy BR 1.16.1
The county will work with conservation organizations in the county to implement a strategic and coordinated effort to identify areas of the county that will be acquisition priorities. Once those areas are identifies, the county will explore the level of interest of willing sellers with property in those areas.

- Implementation Strategy BR 1.16.3
The county will encourage the dedication of easements and other lands to open space.

Page 3.17 BR 2.7 Fire Suppression and Sensitive Plants and Habitats

After the last sentence, add: For matters concerning the protection and preservation of unique and sensitive habitat on lands in production agriculture, refer to the policy and implementation of AGP25 of the AG Element.

Add:

- Implementation Strategy BR 2.7.1
The county will coordinate with state and federal public trust agencies and consult/contract with a qualified fire ecologist to develop standards, protocols and recommendations for fire suppression strategies in areas where sensitive plants and habitats occur

- Implementation Strategy BR 2.7.2
The county will coordinate with other local jurisdictions and CalFire to conduct public outreach to inform residents living in and near areas where sensitive plants and habitats occur about standards, protocols and recommendations for fire suppression strategies in areas

Page 3.17 Implementation Strategy BR 2.8.2
Replace the existing text with the following:

Discourage the use of plants identified as noxious weed species as listed in the California Department of Food and Agriculture Section 4500 and plant species listed on the California Invasive Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concerns in California", in landscaping of proposed development.

Page 3.17 Implementation Strategy BR 2.8.3

~~Encourage~~ ~~Require~~ the removal of invasive exotic *plant* species, to the extent possible when reviewing discretionary development projects that are unrelated to agriculture, ~~and include monitoring to prevent re-establishment in managed areas.~~ Support educational programs that inform property owners about appropriate vegetation management techniques.

Page 3.18 Policy BR 2.9 Promote Use of Native Plant Species

- Implementation Strategy BR 2.9.1

The county will coordinate an informational outreach effort to inform consumers, retail nurseries, landscape contractors and others about the benefits of using native plants, especially those varieties that provide some wildlife habitat value, drought resistance, and fire suppression.

Policy BR 2.10 ~~Non-toxic Pest Control~~ Integrated Pest Management

Encourage the use of integrated pest management practices. (refer to AGPI2) and organic practices to manage pests with the least possible hazard to the environment.

Page 3.19 Implementation Strategy Policy BR 3.2.1

When avoidance of damage to native specimen trees is not feasible in discretionary land use permits and land divisions, require mitigation measures, to include the replacement at specified rations, replanting plans, and reseedling of disturbed open areas with native, drought and fire-resistant species, using local stock, if available. A long-term monitoring plan should also be required.

Page 3.23 BR 4.5 Encourage Stream Preservation on Private Lands

Add:

- Implementation Strategy 4.5.2

Encourage private landowners with livestock operations located within stream corridors and riparian habitat to work with Resource Conservation Districts to develop grazing management plans that incorporate best management practices that can enhance and conserve the natural structure and function of streams and riparian habitat.

Page 3.25 Implementation Strategy BR 4.6.1

Delete ...U.C. Cooperative Extension, ~~the County Farm Bureau~~ and the Regional Water Quality Control Board.

Policy BR 4.7 ~~Contamination from Pesticides~~ Encourage the Safe and Legal Use of Pesticides

Support the existing regulatory program as administered by the California Department of Pesticide Regulation and the local Agricultural Commissioner to limit contamination from the use of pesticides.

Implementation Strategy BR 4.8.1

Implement ~~Best Management Practices~~, including integrated pest management, *mitigation practices as required by the Regional Water Quality Control Board* to minimize fertilizer runoff from County-owned and managed properties.

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Policy BR 4.9 ~~Pesticide Reduction~~ Encourage Use of Least Risk Pesticides

Support the existing regulatory program as administered by the California Department of Pesticide Regulation and the local Agricultural Commissioner and programs that encourage the use of practices such as integrated pest management and the use of least risk pesticides, that minimize the environmental impacts of the use of pesticides.

Page 3.27

BR 5.3 Wetland Conversion

~~Discourage~~ Avoid the conversion of wetlands, including vernal pools, and vegetated lands to agricultural uses, except where grazing may improve the health and function of those wetlands. Where grazing occurs in and around wetlands and vernal pools, encourage grazing management that improves the health and function of those wetlands.

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BR 5.4 Wetlands and Agricultural Lands

- Implementation Strategy 5.4.1

Encourage livestock grazing best management practices for wetlands and vernal pools.

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BR 7.3 - ~~Agricultural~~ Best Management Practices

Support ~~agriculturalists and other~~ landowners that participate..... in coastal watersheds. Refer to AGP 9 – 13 for additional information on agricultural Best Management Practices.

Policy BR 7.4 Sedimentation and Implementation Strategy BR 7.4.1 please move the last sentence to the policy to the first sentence of the implementation strategy as identified below:

Implementation Strategy BR 7.4.1

On County-owned lands, implement Best Management Practices in order to reduce sediment transport to coastal waters. Implement provisions of Total Maximum.....