

Summary of comments and concerns during the General Plan Update Focus Group Session #6

Agricultural, Conservation, and Open Space Elements

On Thursday, March 3, the General Plan Update Team held the sixth Focus Group Session designed to allow for public input and participation in the Update process. This session was focused on proposed revisions and additions to the Agricultural, Conservation, and Open Space Elements. There were three main objectives for this meeting that included: educating the public on the three elements, previewing the Board of Supervisors Workshop, and soliciting comment and ideas from the public.

The Focus Group Discussion included a review of the public comments received during the February 17th Stakeholder Group meeting (Attachment C). An overview synopsis of the process to date for updating the elements was provided to attendees, which led into the policy consideration discussion. Once these introductory remarks were made, the Focus Group was asked to provide input on the specific policy considerations by element to be addressed through the General Plan Update.

Agricultural Element

Transportation Related Comment:

- 1. Is the transportation connector (between Elk Grove and Rancho Cordova) going to be situated in the Cosumnes River floodplain?*

Response: Not necessarily, there are a number of alternatives, in fact 6 are being suggested for the Elk Grove-Rancho Cordova-El Dorado connector and those alternatives can be found on the SACOG website. It is true that in recent weeks a suggestion of a 7th alternative connector route could be placed within the floodplain of the Cosumnes River. This 7th alternative is currently under study by SACOG and has been elevated to the point of being included into the list of alternatives.

Soil Classification Comments:

- 1. If you stop irrigating prime farmland, will it drop down to a lesser category? If so, what is the State's rationale behind this?*
- 2. What prevents developers from buying farmland and ceasing irrigation to reduce its classification?*
- 3. Why is the state agricultural designation different from the federal designation?*
- 4. Since grazing land is not irrigated, how is it classified? How can its classification be changed?*

Response: If farmers stop irrigating prime farmland for a period of up to 3 reporting cycles in the statewide classification system used by the Department of Conservation, the soil classification can be downgraded to another soil level classification, for example: prime farmland to statewide importance farmland. The reason that downgrading from one soil classification to another is allowed is due to the fact that the criteria used by the Department of Conservation details the classification of soil in concert with level of agriculture practiced on the soil. If no agriculture is practiced for up three reporting cycles, then the land classified as prime farmland can be reclassified. The current state system is designed to not recognize that the soil fertility has not likely decreased over the three reporting cycles and likely could still be deemed just as fertile even without the irrigation.

There are perceived loopholes in the State Farmland Mapping system. Currently there is nothing to prevent development interests from purchasing Prime farmland and then curtailing irrigation for over three reporting cycles thus allowing a reduction in the soil classification. Conservation easements are one option to curb this perceived problem.

County Planning staff is researching the California Department of Conservation classification system and how it is different from the U.S. Department of Agriculture's soil system and once that is determined we will amend the notes to reflect that distinction.

Grazing land is initially classified as having a minimum mapping unit of 40 acres to be considered for grazing land. However, grazing land can be changed if the landowner decides not to continue grazing practices on his/her property and use the property for some other use.

Agri-Tourism Comments:

1. *We need educational efforts and a collaboration with the cooperative extension to facilitate agri-tourism*
2. *Would agri-tourism include golf courses?*
3. *Is agri-tourism another economic incentive for agriculture and farmers, like the Williamson Act?*
4. *The Williamson Act may be abused with developers leasing the land to farmers.*
5. *Has the County looked at integrating wildlife protection with agriculture?*
6. *How much input have we received from ranchers regarding what they need to remain viable?*
7. *How does the County define what is and is not considered an "agriculturally-related" activity?*
8. *Wildlife watching should be considered a possibility for Agri-tourism.*
9. *Development in Elk Grove has stifled previously established and viable Agri-tourism.*
10. *A "farm trail" similar to Lodi's "wine trail" may help boost Agri-tourism.*

11. *Buying products directly from farmers has an educational benefit as well.*
12. *Look at Agri-tourism from the standpoint of the agricultural “experience”, not necessarily concentrating on the specifics or the marketing.*
13. *To get children to value the land, they must experience what it has to offer first-hand.*
14. *If you increase expenses to agriculture, they may lose viability.*
15. *Farmers may be worried about people entering their property. There may also be insurance-related issues.*
16. *Development adjacent to agriculture is in conflict with certain uses, such as shooting and flying model airplanes.*

Response: Agri-Tourism currently is being addressed within the General Plan Update process in the context of 1) how best to incorporate the economic engine of agriculture into the policy framework of the General Plan; 2) how best to continue and enhance the agricultural production in the County given the industry flexibility to have economic assurances to maintain agriculture; and 3) how best to incorporate the education of agriculture and the experience of agriculture into the lives of County citizens.

The current discussions regarding Agri-tourism do not include golf courses because golf courses do not encourage, nor contribute to agricultural production or sustainability. The County is just beginning to discuss this Agri-Tourism strategy and activities related to agriculture and whether certain activities are compatible or incompatible with agricultural operations. For example, wildlife viewing may be incorporated into this strategy, given the land can be maintained in agriculture uses and at the same time yield public benefit by allowing the public to view over wintering bird populations. This is just one idea.

To date the County has not reached out to individual ranchers or growers. The Planning Department in conjunction with the Agricultural Commissioner are working to obtain contact information for ranchers and growers to be able to bring this important stakeholder group to the table and work collectively towards a sound Agri-Tourism strategy.

Conservation Element

Urban Runoff Comments:

1. *Address runoff control with careful plant selection and landscape architecture and design.*
2. *Is there a section in the Agriculture Element that deals with runoff from agricultural lands?*
3. *Green roofs and catch basins work well, but will the Building Department or the Zoning Code allow for these?*

4. *The County is still installing lawns in public projects (such as street medians) when they should be installing and encouraging landscaping that doesn't require as much water and fertilizer.*
5. *The Farm Services Board has subsidies for filter strips, etc.*
6. *The Conservation Element needs to address water and energy conservation to show County's commitment to these issues.*

Response: Runoff from agricultural lands is identified in the Agricultural Element as a discussion of vegetative filters for purposes of enhanced water quality conditions. Additionally, there is a recent state regulation addressing irrigated agricultural runoff in the form of a discharge waiver. There are many opportunities for growers and farmers to engage in methods to curb runoff into streams and rivers such as drip irrigation, and grants to provide water efficient delivery systems for irrigation purposes.

Green roofs and catch basins may be recognizable tools towards low impact development and green infrastructure adopted as part of the Planning Department's design guidelines for commercial and eventually residential developments.

The Planning Department is not aware of current practices utilizing lawns in street medians for public projects. Generally, public projects encourage the use of native plant materials in conjunction with water wise practices to diminish water consumption and fertilizer demand. The Planning Department will work within the current policy framework of the Conservation Element section addressing Water Conservation and ensure that public projects should be using drought resistant plant materials requiring minimal if any fertilizer.

Streams and Rivers:

1. *A Connecticut ordinance requires a buffer between agriculture and rivers.*
2. *We need mandatory buffers around streams.*
3. *Why can't we make Gerber Creek an attractive amenity for nearby residents?*
4. *What about the Sacramento River and other rivers? Why are they not addressed?*
5. *Why can't we introduce existing policies (state and federal) into the Conservation Element regarding the American River?*
6. *The County should be more proactive when dealing with rivers and should be more forward and direct with the Board.*
7. *What position are we putting the Supervisors in if we pit growth vs. environmental protection?*
8. *We need to address the economic cost of not being proactive regarding rivers. Bring this up to the Board and use the LA River as an example.*
9. *In terms of planning for development, Elk Grove does a better job than the County.*

10. *Create sustainable ecosystems instead of focusing on specific species.*
11. *Address closed conduits*
12. *If an entity restores a creek and takes species in the process, they should not be punished.*
13. *Who pays for restoration?*
14. *Offer tax incentives for easements.*
15. *The Drainage Master Plan does not address open space, buffers, etc., only the conveyance of water.*
16. *Variances and special use permits often render policies useless.*

Response: The issue of buffers around agriculture and rivers is of importance and concern here in the Sacramento Valley given the propensity of development onto agricultural soils and the need to protect those soils for agricultural uses and food production. The idea of providing buffers adjacent to the streams and creeks during the development process has been addressed in the 1993 Conservation Element, yet since that time the Upper Laguna Creek Collaborative has begun to show the multifaceted uses of the corridors of such creeks. Gerber Creek is a great example of how the knowledge gained from the Upper Laguna Creek Collaborative can benefit from the planning and eventual implementation measures. However, not all creeks will likely possess the same circumstances Laguna Creek faces with the adjacent development intensity. Finally, methods to enhance creeks and streams for amenity and enjoyment are often at odds with flood control and safety concerns. The Conservation Element is addressing these conflicting interests and will be working through the best alternatives to establish a balance where practicable.

There are currently efforts under way such as the Sacramento River Corridor Planning Forum to create a comprehensive set of guidelines for a 50-mile stretch of the river from Courtland to the Fremont Weir. The purpose of these guidelines are to address the aggregate impacts development is currently imposing onto the river system and how best through various means whether setback levees, maintenance buffers, or acquisition, to protect the sensitive river system and build flexibility into the floodway system.

Other rivers in the County, such as the American, Cosumnes, and Mokulumne are being addressed in the Conservation Element for their overall contribution to providing habitat, recreational opportunities, flood control, irrigation, and instream benefits for aquatic species such as fisheries.

State and Federal policies dealing with the American River, namely the State and Federal Wild and Scenic river designations are addressed in the American River Parkway Plan, which is currently being updated. The Parkway Plan is considered an element to the General Plan and is to be integrated as appropriate into other elements as necessary. Integrating the policy discussion of the State and Federal Wild and Scenic designations into the Conservation Element may be useful.

County Policy & Draft Policy Wording Issues

1. *Using the word “encourage” in policy language makes it weak. They need more “teeth” and more detail.*
2. *Policies really come down to implementation.*
3. *Policy wording is unclear – what is the difference between “encourage” “direct” and “establish”?*
4. *Replacing “encourage” with “working” will make the policy more proactive.*

Response: The purpose of these stakeholder and focus grouping meetings is to receive input just how the County should address the important issues surrounding Agriculture, Conservation, and Open Space and with that comes a long process to which there will be many iterations of policy. At this juncture in the process it is too early to begin finalizing policy language given we have to agree on which policies to create or remove. Therefore, it is an excellent point to reiterate stronger action policies to be proactive to the issues facing the County.

Planning has suggested that during the update process, a tracking chart be devised to assign, as appropriate, the various implementation measures related to given policies that are assigned to responsible County departments. First this may have an integrating effect upon the communication among department to help facilitate a better-coordinated response toward future updates of the General Plan. Secondly, such tracking would act as a good performance measure toward meeting the goals and objectives of the General Plan as well as the County’s strategic plan.

Vernal Pools and South Sacramento Habitat Conservation Plan (SSHCP):

1. *How will vernal pools be addressed in the General Plan?*
2. *How will the HCP be integrated into the General Plan?*
3. *Who is liable for vernal pools that breed mosquito’s, possibly contributing to the spreading of disease?*
4. *Are there policies addressing grasslands and uplands in the General Plan or HCP?*
5. *“Creation” of vernal pools does not work and is not an appropriate mitigation measure.*
6. *Oak trees and vernal pools can coexist, but placing oaks in vernal pools for mitigation purposes should be avoided.*
7. *Has the County seen overselling of mitigation credits?*
8. *The County needs to continue cooperating with other agencies to keep tabs on mitigation credits.*

Response: The South Sacramento Habitat Conservation Plan (SSHCP) is being integrated most specifically into the General Plan update process by way of section five of

the Conservation Element, where an ecosystem approach is being taken towards dealing with aquatic, terrestrial, and special status species. Part of the aquatic section of the Conservation Element addresses vernal pool protection, enhancement, mitigation, and special status species that likely call vernal pools home.

Vernal pools are ephemeral wetlands, meaning they only contain water for a very short time during the winter and spring months before the onset of summer. Given their brief period of holding water and the amount of oxygen in the pools, it is generally not a concern about having mosquitoes present. However, if there should be a problem with standing water contact the Sacramento-Yolo Mosquito Vector Control to have the situation addressed immediately.

Policies related to grasslands and uplands, specifically grasslands will be addressed and developed as the stakeholder process continues to gain momentum throughout the next few months.

The overselling of mitigation credits has been of great concern for the overall success of the mitigation programs the County currently engages in. On many occasions the overselling of mitigation credits on designated mitigation bank properties has compromised the survival rates of the mitigation plantings or aquatic species success. Mitigation as currently allowed is a tool towards restoring lost habitats, yet the very process by which the credits are being implemented acts to destroy the very habitat mitigation banks attempt to protect. The Planning Department through existing policy, desires via the creation of an Use Permit process, to regulate the tracking of these credits to ensure orderly allocation, proper placement, and adequate success and survival rates for the mitigation species.

Oak Woodland & Tree Resources:

- 1. Why is only the East County addressed in the language regarding oak woodlands?*
- 2. There needs to be a new section to deal with oak trees in the rest of the County.*
- 3. The word "native" often brings to mind oak trees. Will heritage, landmark or other significant trees be addressed as well?*
- 4. Is the County proposing a no net loss policy of total tree canopy, or only native tree canopy?*
- 5. There is little room in the County to place more trees for mitigation purposes. The Parks Department needs help maintaining existing oaks. Can some mitigation activity be focused on maintaining existing trees, rather than only planting new ones?*
- 6. Slow development to catch up with mitigation.*
- 7. Address out-of-kind mitigation.*
- 8. Two exact same habitats may have very different functions/values depending on their location and adjacent uses.*

9. *How do we follow up or keep tabs on mitigation. Do we track if trees survive? How is mitigation monitored?*

Response: The Planning Department recognizes that oak woodlands occur throughout the unincorporated County, whether north of the American River in and around Dry Creek or in urban settings such as along Verde Cruz Creek, yet the primary focus of the policies deals with large stands of habitat like those found in the East County. Given the occurrences of oak woodlands elsewhere in the County, there will likely be some policy direction given during the upcoming Board of Supervisor's workshop on the most suitable areas for oak woodland protection and thus creation of policy.

Regarding no net loss in native tree canopy the current thought is only native, yet the scope of the not net loss will likely include total canopy whether native or non-native. Heritage, landmark, and other significant trees currently are addressed in the Tree Resources section of the Conservation Element.

The maintenance of existing trees will likely not replace the current mitigation process of requiring new trees to be planted once the original tree (s) is removed. The maintenance of existing trees does not necessarily address the loss of trees during development projects. The Department of Environmental Review and Assessment maintains the Maintenance, Monitoring, and Report Plan for each applicable development project. There is a three to five-year time frame where the development applicant is required to monitor the status of the mitigation. However, after five years unless otherwise stipulated, there is no monitoring of the mitigation to ensure overall success. Current interim County policy for tree mitigation offers a greater chance for survival of trees, due the type of container: a deep pot (1 gallon) verses a 15-gallon root bound container.

Resource Conservation Areas:

1. *Identifying Resource Conservation Areas within the UPA takes land out of development and may be exploited by developers to expand the UPA.*
2. *Change the wording of the "Resource Conservation Area" to "Resource Area"?*
3. *Preserving resources within the USB may be worth the increased quality of life even if we have to expand the UPA.*
4. *It is a good idea to identify important resources, even if we cannot preserve them all. It raises awareness of their existence.*
5. *Focus group participants agreed that identifying Resource Conservation Areas within the USB is a good idea, but not necessarily committing to preserving them.*
6. *The County must define what Resource Conservation Areas are and what their identification means to development.*
7. *The type of resource and type of land should be identified to give planners a bargaining chip with developers.*
8. *Development is of a higher value when it is located near natural resources and amenities.*

Response: Resource Conservation Areas (RCA's) are identified on the County General Plan Land Use Diagram and highlight key resources such as oak woodlands. During the update process there will be a need to re-evaluate the intent and scope behind the RCAs and whether or not the policy section currently held in the Conservation Element should be moved to the Land Use Element. The move to the Land Use Element would allow for greater recognition and awareness for the land use planner that important resources occur in these RCA designations. Furthermore, the movement of this policy discussion may allow for avoiding land use conflicts such that have arisen in the near past.

Open Space Element

Habitat Corridor Connectivity:

- 1. We need to show more and stronger connections on the map.*
- 2. Does the County's open space map coincide with Sacramento Valley Conservancy's?*
- 3. The map needs more connectivity to address the flyway and identify stands.*
- 4. How does the County identify resources on the map? Is it from first-hand observation?*
- 5. Good informational resources include the Resources Agency, local farm services agency, The Nature Conservancy and SACOG.*

Response: Habitat corridor connectivity is key to establish, maintain, and enhance wildlife populations. Additionally, the habitat corridor connectivity will likely hold benefits for recreation and outdoor enjoyment, plus amenities for adjacent development interests.

The County's Open Space Vision Map was generated in part by the visioning process developed by the Sacramento Valley Conservancy and other partners. The resources on the map are part desired for future land acquisitions, part existing protections via conservation easements for species habitat protections, and part recreational for purposes of outdoor enjoyment.