



Recommendations Regarding the Yolo County Draft General Plan

November 20, 2008

Yolo Ag Futures Alliance Comments on Yolo County Draft General Plan November 20th, 2008

GENERAL RECOMMENDATIONS

- ***Set priorities clearly.*** It's not clear from this document why some Policies are not associated with Actions and why some Actions have seemingly arbitrary timelines. Given the County's limited funds, we recommend that there be public discussion regarding setting priorities in the General Plan.
- ***Match Policies with Actions.*** The Actions are matched with Policies, but the Policies are not paired with Actions. This makes it difficult to determine which Policies are designated for implementation. We recommend that Policies and Actions be clearly linked.
- ***Leverage existing efforts.*** Several Policies and Actions are already being implemented in part or whole by local agencies and organizations. We recommend the inclusion of listings of ongoing programs and activities of local organizations, rather than tasking County responsibility for undertaking all efforts.
- ***Strengthen language.*** Many Policies use the term "encourage" instead of "require." In many cases, the language should be strengthened or the Policy should be split into a Policy and an Action (see following comment). We recommend reviewing Policies and Actions and reconsidering whether each should be mandatory or voluntary.
- ***Distinguish between Policies and Actions.*** Policies that include Action items should be moved to the Action section of each Element or at least separated into a distinct Policy and a distinct Action. (The AFA provides some examples in this document, but we recommend all Policies be reviewed.) Policies should be the "what" while Actions should be the "how." Too often in this draft the two are combined, which is confusing to the reader and will make the Plan difficult to implement.
- ***Avoid duplication of Policies and Actions in different Elements.*** Policies and Actions should not be duplicated in Elements unless there is a legal or policy reason for doing so. The Element can refer to the Policy or Action in another Element, if necessary. The current system of duplication is needlessly confusing, in particular in cases where the duplicated Policies and Actions contain differing language.

PRIORITIES

The Yolo Ag Futures Alliance recommends that Yolo County consider the following Actions in the General Plan as top priorities for implementation.

New Actions

The AFA recommends the County add the following actions to the General Plan and establish them priorities:

- “Designate a County staff person to provide assistance to community kitchens and other growers/processors who need to navigate the USDA and FDA regulatory processes or other regulations to bring their products to market.” Farmers are increasingly savvy about producing value-added products using community kitchens or other means. They do not, however, generally have the expertise necessary to navigate regulations to allow them to sell beyond farmers markets and farm stands.
- “Prioritize farm to market route improvements, including routes important to agricultural goods movement and agricultural machinery transport.” Yolo County has not identified improvements needed on farm to market routes, nor has the County prioritized such improvements. Given the limited amount of transportation funding available, and the increasing emphasis of SACOG on goods movement, it’s important to establish priorities.
- “Require county counsel to work with non-profits to develop the framework for agricultural land mitigation banks.” The primary obstacle preventing non-profits from setting up banks are the legal and administrative hurdles.
- “Reinstate funding for the Agricultural Marketing Initiative.” This is an important program; it should be a priority of the Board to identify another source of funding to continue the program.
- “Work with other involved local agencies and non-profit organizations, such as the Yolo County Resource Conservation District, to develop best practices and incentives that support wildlife-friendly agriculture.” There are policies in the General Plan related to encouraging wildlife-friendly agriculture, but no actions. The County does not currently do enough to support wildlife-friendly agriculture, so a concrete action is needed. In addition, Louise Jackson, PhD, Land, Air and Water Resources at UC Davis, found that the two most effective ways to reduce climate change within the county were to reduce nitrogen runoff and implement wildlife-friendly habitat restoration.

Existing Actions

The County should identify the following existing actions in the plan as priorities:

- 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. **This should be a priority action, but Policy LU-7.5 (with which this Action is associated) should either be eliminated because it is an Action and duplicative, OR should be re-written to be consistent with CC-A11 to include ag land preservation.**

- 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 action should be combined with Action CC-A28).**
- Action AG-A12 – “Work to site a refrigeration and consolidation unit in a location **central to the needs of the County.**” Again, AFA research (and, specifically through conversations with Capay Valley Vision) has shown that the lack of a large refrigeration and consolidation unit is a barrier for many small farmers to sell to large grocery store chains. Such chains utilize large semi-trucks, require close freeway access, and large roads (e.g. small, county roads with narrow bridges are often impossible for large trucks to use). In addition, such a refrigeration and consolidation unit could be co-located with a community kitchen or other agricultural marketing efforts.
- Action AG-A14 – “Reduce development restrictions for new and/or expanded agricultural processing, on-site agricultural sales, and **bioenergy production.**” The Yolo AFA has been working for the past year to research existing processing capacity in Yolo County, and to make recommendations on how to increase capacity in the future. Current development restrictions for processing has been identified as a barrier to increased capacity, therefore reducing those restrictions should be a priority for the County.
- Action AG-A15 – “Revise countywide standards to create incentives for agricultural economic development and value-added enterprises. These may include the following: parking (e.g. use of permeable surfaces), occupancy (e.g. use of barn structures for limited events), roads (e.g. reduced rural road widths and/or improvements) and sanitation for special events (e.g. use of portable toilets instead of permanent systems.” Again, this should be a priority given the focus on economic development in the entire General Plan, and the Farmbudsman position should be responsible for assisting with these both revising and implementing these new standards.
- Action AG-20 – “Create an Agricultural Permit Coordinator position (“farmbudsman”) to assist farmers and ranchers with the permitting process. The Coordinator would work closely with representatives from the Planning and Public Works Department, Agricultural Commissioner’s office, Health Department, Economic Development office and other agencies, to facilitate and expedite promising value-added agricultural projects.” In addition, the “farmbudsman” should assist farmers and ranchers with revised Countywide standards as discussed in Action AG-A15. The County currently does not have anyone on staff with the

express responsibility of assisting with agriculture permitting and standards, and this should be a priority for the County given the focus of this General Plan on economic development.

SPECIFIC COMMENTS

The following are specific recommendations on Policies and Actions in individual Elements.

Land Use and Community Character Element

Policy LU-2.1: **This whole policy appears to be an action to support a more general policy of protecting agriculture in Policy CC-2.5. Change to an action or eliminate.**

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 is the action**). **This policy should be split into a policy and an action.**

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 are each actions**). **As mentioned above, delete duplicative actions to avoid confusion and separate policies that contain action into separate items.**

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 seems to 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**). **Separate this policy into an action and a policy.**

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 is an action**).

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 policy should be an action and should be strengthened to: "Designate other...." Many scenic roadways or routes are used by bicycles and slow moving agricultural vehicles (such as County Road 99) and have very high vehicle traffic. We recommend a new Action that works to reduce maximum speed, widen roads (where feasible), and provide signage along scenic roadways.**

Policy CC-1.15 The following features shall be protected and preserved along designated scenic roadways and routes: **This seems like an action, could be rephrased as “Protect and preserve the following features along designated scenic roadways and routes...” This policy also needs to state clearly that ag is exempted from this policy.**

Action CC-A6 **This is a good action but is too limiting; the AFA has long recommended the creation of farmland preservation zones to identify high priority farmland to preserve. This action should read, “Direct conservation easements to buffer areas between unincorporated communities or other areas designated as high priority for farmland preservation...”**

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.” **Implementation of this Action should be a priority for the county, and should be combined with Action CC-A28.**

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. **This should be a priority action, but Policy LU-7.5 (with which this Action is associated) should either be eliminated because it is an Action and duplicative, OR should be re-written to be consistent with CC-A11 to include ag land preservation.**

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:

- 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.
- Home sites on less than 20 acres require a Use Permit.

Yolo AFA recommendation is to change the first bullet to “footprint of home, ancillary structures and ornamental landscaping,” and to combine this Action with CC-A15 to ensure a collaborative process with the farming community.

CC-1.17 Change this Policy to clarify that any required landscaping shall emphasize the use of native plants, and restore habitat to the extent possible.

Policy CC-4.9 This entire Policy is an Action. The Policy should read, “Minimize heat-islands to reduce impact of climate change.” The Action should read, “Require measures

that minimize heat islands, such as light-colored and reflective roofing materials...” Also this Action should add encouragement of green roofs to the list of requirements.

Policy CC-4.13 There should be an Action associated with this Policy that reduces permitting hurdles and costs for Green Design and Construction projects.

Circulation Element

Need a new action as follows, “Prioritize farm to market route improvements, including routes important to agricultural goods movement and agricultural machinery transport.” Yolo County has not identified improvements needed on farm to market routes, nor has the County prioritized such improvements. Given the limited amount of transportation funding available, and the increasing emphasis of SACOG on goods movement, it’s important to establish priorities.

Agriculture and Economic Development Element

General comments:

- The entire Element should include more connection to ongoing work, partnering organizations that are already implementing Policies and Actions listed in this document.
- Wording on page AG-1 regarding agriculture in Yolo County and the generation of a dynamic economy need to be changed to a positive focus on what this Element is doing to improve the rural economy and viability of farming.
- There is already a signed Safe Harbor Agreement in Yolo County, with the permit held by Audubon California Landowner Stewardship Program. Please add language to reflect this situation.

Policy AG-1.5. This policy needs further discussion and refinement – there are some uses, e.g. ag conversion to small-scale habitat that could be beneficial but that could be difficult to implement with these conditions in place. There is too much gray area now. The County needs more discussion this important issue more with the public before establishing criteria. One possibility: Replace policy with one that directs the county to develop criteria for conversion. In addition, if the criteria do not change, at least change “outweighs” in Bullet A to “justifies.” This is a known term in legal circles and provides more flexibility.

Policy AG-1.15 This is the only place in the draft General Plan that the term “Farmland Preservation Zones” are used. There needs to be an accompanying Action that directs the county to create Farmland Preservation Zones, in collaboration with other local entities. The Yolo Land Trust has secured some funding to develop such priority areas for ag land conservation.

Policy AG-1.16 This is an Action, not a 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

Elsewhere in the GP, the Ag Department takes on a greater role in ag land preservation. This Policy should be accompanied by an Action that states that the Agriculture Department facilitates a process to coordinate easement acquisition among organizations and agencies.

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 Policy is duplicative of – and in conflict with - CC-A6 related to directing easements to buffer areas. The Policy and Action for this item should be included in only one of these Elements and if you are going to maintain both Policies and Actions in both Elements, they need to read exactly the same. Note our previous comment to include areas designated as high priority for ag preservation, called Farmland Preservation Zones, in this policy as well as buffer areas. The AFA does not recommend limiting placement of easements to lands located close to cities and unincorporated communities because these easements are expensive and often difficult to acquire.**

Policy AG-1.22 Discourage export of County water (**This is the Policy**). Within conservation easements, preclude the practice of fallowing fields for that purpose. **This second sentence should be an Action –however this should be changed to “encourage landowners to preclude this practice within conservation easements.” Conservation easements need to be individually negotiated between the landowner and the easement holder and the funder. It is already difficult to entice some landowners to enter into easements and this Policy would make it even harder, especially in high priority ag areas.**

Policy AG- 2.10 – Remove “to allow for ongoing application of ag pesticides and herbicides on neighboring land...” Put period after “buffers within habitat area.”

Policy AG-2.15: **Better language could be “restore riparian areas, including revegetation of ditches, in a manner compatible with ongoing water delivery systems.”**

Policy AG-2.17 Encourage the establishment of agricultural mitigation banks in appropriate locations that provide strategic protection of high value farmland. **An Action should be added to direct the county counsel to work with non-profits to develop the framework for ag land mitigation banks. The primary obstacle preventing non-profits from setting up banks are the legal and administrative hurdles.**

AG-4.2 and 4.3 – Please add Yolo County Resource Conservation District, Audubon California Landowner Stewardship Program, and Center for Land-Based Learning.

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. **The AFA does not recommend directing mitigation to areas adjoining growth boundaries, but rather recommends creating Farmland Preservation Zones to which to direct mitigation, as well as buffers between cities. The AFA recommends revising this Action as follows, “Amend Ag**

Mitigation Ordinance through collaborative process to direct ag mitigation to farmland preservation zones and buffers between cities.” The Yolo Land Trust has already received some grant funding to assist with the identification of Farmland Preservation Zones.

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. **The AFA supports this recommendation if mitigation directed to appropriate locations, such farmland preservation zones, agriculture mitigation banks, and buffer areas between cities.**

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. **This Action is too limiting; there are other crops and/or land uses that sequester carbon and could be utilized for conservation banks. There needs to be a Policy that states, “Support innovative ways to reward land uses that sequester carbon.” The Action should be to develop a report of the feasibility of creating conservation banks to provide...”**

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-to farm ordinance.

•This Action is inconsistent with previous duplicative Actions in other Elements. We recommend that there is only one Action in one Element of the GP to avoid confusion. If necessary, the document can refer to the presence of the policy in another Element. It should be in the Ag Element and referred to in Land Use. If it remains in both, ensure that the language is the same.

Action AG-A7 Amend the Right-to-Farm Ordinance to require the disclosure of related deed restriction and notices as a condition of sale for any transfer of property to increase the general awareness of such provisions. **No longer need this Action with the passing of AB 2881; AB 2881 requires the disclosure of the State Right to Farm Law as a condition of any sale within 1 mile of a farm. Should change the Action to, “Educate agricultural realtors and prospective buyers of rural property about the state and county right-to-farm ordinances,**

including the new law that requires disclosure of the ordinance prior to purchase of any property within a mile of a farm.”

Action AG-A9 Create opportunities for incubator farms, consisting of small leased parcels on land protected under conservation easement. Provide opportunities for joint access to shared equipment and irrigation. Ensure that leases mandate active agricultural production. **Change language from “incubator farm” to “small-scale agriculture.” The term incubator farm is undefined and confusing. Also, this action needs a clearer link in the language to the Policy related to antiquated subdivisions.**

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. **The AFA is concerned about unintended consequences; need to ensure that this Action does not interfere with the existing Conditional Use Permit process for additional ag housing on existing agricultural parcels.**

NEW ACTIONS AND POLICIES

Need a new Action(s) associated with policies supporting wildlife-friendly agriculture. Work with other involved local agencies and non-profit organizations, such as the Resource Conservation District, to develop best practices and incentives that support wildlife-friendly agriculture.

Need a new Action: “Designate a County staff person to provide assistance to community kitchens and other growers/processors who need to navigate the USDA and FDA regulatory processes or other regulations to bring their products to market.” Farmers are increasingly savvy about producing value-added products using community kitchens or other means. They do not generally, however, know how to navigate regulations to allow them to sell beyond farmers markets or off of their own property.

Need a new Action, “Advocate for changes in state law to allow growers to use non-food agricultural byproducts, including wood waste products, for renewable energy.” Despite the Governor’s pledge to increase the state’s use of renewable energy from 20% to 33% of energy usage, a farmer in Yolo County ran into major regulatory hurdles in an attempt to use walnut shells to create renewable energy.

Need a new Action, “Protect existing processing facilities.” The General Plan is heavy on encouraging new processing facilities, but existing processing facilities may also need assistance in order to retrofit to new processing uses, creating and building new markets, etc.

Need a new Policy, “Encourage more hulling and specialty processors and mills, including candy and food processing using nuts.”

Conservation and Open Space Element

General comments:

- There appears to be a lack of technical knowledge in this Element, especially regarding species and habitats.
- There is an over-emphasis on a limited number of species, especially Swainson’s Hawk, Giant Garter Snake and anadromous fish.
- Generally, open space seems to be equated largely with recreation. We would like to see more policy language on biodiversity conservation, multiple-benefit conservation (e.g. ecosystem services such as soil conservation, biodiversity, pollinator, water quality) and agriculture projects that provide open space as well.
- Overall lack of consistency in Policies and Actions for county vs. private lands.
- Need to cross-reference themes that are in other sections such as wildfire or levee setbacks.
- There is a lack of knowledge of conservation organizations—need to add CLBL, RCD, Audubon and YLT as organizations working on particular issues in many areas.
- Snow Mountain National Conservation Area is treated as a *de facto* designation when it does not yet currently exist.

Open Space

In Part 2, please add other organizations that are working in conservation in Yolo County; Yolo County Resource Conservation District (RCD), Audubon California Landowner Stewardship Program (Audubon), Center for Land-Based Learning (CLBL) and Yolo Land Trust (YLT).

Audubon Bobcat Ranch needs to be mentioned at some appropriate place in the Element; it’s listed as a conservation easement but no reference to what is happening at the ranch and its overall goal as a working landscape cattle ranch compatible with biodiversity conservation.

Page CO-8; Bullet states “The Blue Ridge Berryessa Snow Mountain Natural Conservation Area (NCA). **The NCA is not yet completed, and any reference to it as a designation should be removed.**

Policy CO-1.1; In general, Open Space does not generally “support” agriculture. However, agriculture does support Open Space.

Policy CO-1.15; **Add the words “from willing landowners”** after “Support efforts to acquire either fee title or easements...”

CO-1.21; If DQU is transferred to the County, **we recommend that there be a grassland and riparian restoration plan that has funding and accompanies the property transfer. In addition, the County should only accept property transfer if there is some kind of endowment for management included.**

Policy CO-1.22; Research clearly shows that a County OHV park is not a solution to illegal OHV use. **We recommend the removal of this Policy from the General Plan.**

CO-1.23; **language should be changed so that the use of native plants is encouraged within County resource areas as well as any place in the county (private land included).**

Action CO-A3 – **add the words “from willing landowners” after “Acquire fee title or easements...”**

Action CO-A11; **this Action should include funding for agriculture and conservation easements not just resource parks, and should include language to ensure collaboration with local organizations.**

Action CO-A14; **this Action should include eliminating pullouts along Hwy 128** where people park to avoid park fees in the fishing access sites, especially as they increases trespass and poaching on neighboring properties and represent a loss of revenue to the County.

Action CO-A17; many of the current County parking areas are too large and cause driving on habitat. The focus should be to make them as small as possible, planted with native trees for shading, and to create additional habitat. **Add language to encourage design features (such as bicycle racks, bus turnarounds, fewer parking spaces) that encourage bicycle use, alternative transport, and carpooling.**

Action CO-A19; **change language to “camp host docent program”** which creates a situation where camp hosts can “double” as park interpreters (especially in low-funding situations).

Action CO-A20; **change language to “public and non-profit agencies”** rather than just public.

Biological Element

Generally, many of the background paragraphs on wildlife species are very focused on specific species. For example, Paragraph D1a—flooded rice field provides habitat for giant garter snakes and waterbirds (not just waterfowl). **What about other unlisted species that are declining as well?** With regards to Swainson’s in particular, alfalfa is a preferred habitat, not just any field crops.

Paragraph D1b; **this paragraph incorrectly identifies weed species** (Wild oats, soft chess, etc.) as “wild species” which seems to be equated with natives. They are non-natives. Also, annual grasslands, in general, are non-native and not particularly good for wildlife. **Focus of this paragraph should be on small remnant stands remaining of native perennials and forbs that need to be restored.** A particularly important bird species in grasslands is Mountain Plover and sometimes found wintering in Dunnigan Hills.

Riparian corridor background information needs to be strengthened; the focus should not be just on Swainson’s Hawk, but include neotropical migrants and/or other listed/focal species as identified by the Natural Heritage Program.

Section d. Need to list scientific name with plant spp.

Policy CO-2.2; **Change language to “preserve and prioritize habitats”**

CO-2.10, CO-2.12; anadromous is misspelled.

CO-2.16; **Change language to “encourage native habitat on public lands and with cooperating adjoining landowners.”**

CO-2.19; the use of prescribed fire to encourage blue oak recruitment is not something with which our conservation partners are familiar. **This should be checked prior to placing in the final document.**

CO-2.21; **Change from 40 acres to 10 acres.**

CO-2.22 ; **include the use of Sacramento perch in farm ponds and other standing bodies of water rather than using non-native mosquito fish (*Gambusia* spp.)**

CO-2.23; **change language from “existing natural vegetation” to “non-native vegetation should be converted when possible to native vegetation.”**

CO-2.24; **add levee setbacks to list**

CO-2.25; **add Yolo RCD and Audubon Landowner Stewardship Program**

CO-2.26; **change language from “organic” to “sustainable”**

CO-2.27; restricting mowing during nesting season is a good idea in practice but produces weedy fields and limits ability to reduce weeds. Nesting birds probably do less well in weedy compared to native grasslands. So a blanket policy is not going to work here. Unfortunately this is a federal policy applied by USFWS so there’s not much of a way around it. **Instead of restricting mowing encourage mowing in patchy distribution as well as**

conduct future research to really see what's going on here esp. in areas dominated by noxious weeds

CO-2.34; **again, please list all the conservation groups**

CO-2.37; many bridges, culverts and other crossing, especially in county sloughs need to be widened to at least 100'. They are too narrow, causing build up of trash, flooding and make riparian restoration impossible. **Any retrofits, new bridges or bridge repairs should be required to be widened to at least 100' in order to accomplish many conservation goals.**

CO-A28 and A29; many of the Actions related to streams seem solely focused on fish; there are other species in riparian habitat

Add a Policy for preserving and restoring sensitive bird spp. beyond Swainson's hawk. Yolo Audubon Society is currently developing a list of focal species for the County, and Audubon also has a list of common birds in decline that would be appropriate for reference or as an appendix.

There is a countywide Safe Harbor Agreement that covers landowners that sign up for Giant Garter Snake and Valley Elderberry Longhorned Beetle. Audubon Landowner Stewardship Program is the permit holder. This needs to be mentioned in appropriate section.

Water

General comments:

- **Need more support for water availability and quality in rural districts/communities.** Local service agencies have little money and human resources.
- **Actions need to take into account existing efforts and complement and support them,** rather than reinvent the wheel. Actions have the County and Parks and Resources taking on lots of work already being done by others. More appropriate to support ongoing efforts rather than have county do it.
- **County was to update and implement the IRWMP through the WRA. There needs to be more discussion and clarification of the already-existing IRWMP and how it will be updated on an ongoing basis, who is responsible, and how the criteria and the priorities created in the IRWMP will be utilized in other efforts.**
- **Water use efficiency - cities, RCDs, and others are already doing a lot here.** No cohesiveness in the Plan with what's going on in the area and there are several inaccuracies.
- **Ag water supply background section talks about primary sources but concerned that it doesn't list Clear Lake or Indian Valley as main sources of irrigation water. Should also be picked up in Action items.**

- The AFA acknowledges that creation of a countywide water agency is controversial, and that this process is being facilitated on a separate track. **The AFA would like to offer to be involved in this process and would ask to be utilized in whatever manner is appropriate as it moves forward.**
- **Need better maps:**
 - Figure CO-6 Bypass is inaccurate
 - Figure CO-8 Need better map of water agency boundaries

Specific Comments:

Page CO-46 Colusa Basin Drain—please change the description to read; “The Colusa Basin Drain begins in Glenn County, carrying drainage water from the western side of the valley, to the Sacramento River at Knights Landing or through the Knights Landing Ridge Cut to the Yolo Bypass.”

ii P. 46 - Under Water Quality: No mention of the testing for water quality being done under the Irrigated Lands program through the CVRWQCB. Boron and mercury are not agricultural pollutants; they are naturally occurring in the watershed.

Page 50 - Need better description of the CCAP: The Cache Creek Area Plan is comprised of the Off Channel Mining Plan and the Cache Creek Resources Management Plan which together regulate and protect the Cache Creek area and view the creek as an integrated system

Policy CO-5.3 – Change the language to read; “Support the management of the County’s groundwater resources...”

Policy CO-5.11 – Suggested removal of “completion of the T-C Canal.” This is probably not wanted, there is not enough water for deliveries, and it would be cost prohibitive.

Action CO-A62 Data collection—already being done by other organizations and groups. Please add them in the next draft (e.g. Yolo County Flood Control and Water Conservation District).

Action CO-A68 - Update and implement the IRWMP...isn’t this the responsibility of WRA?

Action CO-A70 – Regarding the conjunctive use program; the County is probably not the one to lead this effort, but should be supportive of it.

Action Co-A71 – Again, support these efforts, but County should not be the lead; this is already being done by others, and should be coordinated through WRA.

Action CO-A72 - This may not be doable; is it for all wells, private domestic wells, ag wells? Need some clarification in this Action.

Action CO-A73 - **This is already being done by the jurisdictions that have water, and by ag in general.**

Action CO-74 - **Again, this is conjunctive use, and needs to be done by those who have water.**

Action CO-A75 – **Language should be changed to; “work with Environmental Health to improve Wellhead Protection Program.”**

Action CO-76 – Grading Ordinance - The AFA believes that this will be a very controversial ordinance. **As with the Countywide Water Agency, we would ask to be involved in this process as it moves forward. We recommend that it be facilitated, that all agriculture and environmental groups be at the table, and that it be a collaborative effort. We also recommend that the ordinance not include regular agricultural grading (e.g laser leveling of existing level fields, or installation of farm ponds).**

Action CO-A78 - Groundwater Management Ordinance - **again, the AFA recommends that the County needs to proceed slowly, in a facilitated, collaborative effort with all stakeholders at the table.**

Action CO-A79 – This is one of the few policies related to reduced sedimentation, **language should include native vegetation associated with tailwater ponds, cover crops.** CO-A89 is similar but beyond just agriculture.

Action CO-A80- **This Action is unclear as to whether this is for ag water or the rural communities, and the responsibility should probably be a different department.**

Action CO-A81 - BMP's – **language should be changed to “support the efforts of other local and regional organizations to....”** The Yolo Resource Conservation District, Audubon California Landowner Stewardship Program, Community Alliance with Family Farmers, UC Cooperative Extension are just a few organizations and agencies that are already doing this work.

Need to add an Action: Levee setbacks and bridge/culvert widening in sloughs (please see earlier comment; CO-2.37; many bridges, culverts and other crossing, especially in county sloughs need to be widened to at least 100'. They are too narrow, causing build up of trash, flooding and make riparian restoration impossible. Any retrofits, new bridges or bridge repairs should be required to be widened to at least 100' in order to accomplish many conservation goals.

Climate change

Policy CO-8.5. Nothing conclusive yet about grasslands sequestering carbon; **need to add in oak woodlands and riparian forest to this Policy.**

Action CO-A108—what about rural reforestation and carbon sequestration?

Delta Section

Need to add a Policy on wildlife friendly farming as well as levee setback/riparian and wetland restoration

There should be a list of Actions related to agriculture in the Delta. AFA can provide additional inputs on request.

Health/Public Safety

Except for Action HS-A11 very little on levee setbacks for flood control and revegetation.
Needs to be added, especially in the form of multiple benefit projects that can provide flood control, restoration and reduced maintenance for landowners.

Wildland fire section—**need to add an Action for fuel load reduction, esp. in Coast Range.**

Air quality

There needs to be a Policy and resulting Action(s) that assist farming operations with permitting progressive, on-farm bio-energy operations. Current state law is very restrictive and only looks at size of operation and type of crop, not how you farm. The County needs to advocate for change at the state level in order to encourage these kinds of renewable energy resources.