

# ATTACHMENT 2

## FORMAL RESPONSE TO THE ENERGY WORKING GROUP RECOMMENDATIONS FOR THE DRAFT GENERAL PLAN IN REGARD TO ENERGY

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### KEY:

#### **Green Text Passages: = Energy Working Group Recommendation**

*All Energy Working Group recommendations were copied verbatim and italicized.*

#### **Response:**

*Staff's comments and response to the Working Group's suggestions.*

#### **Suggested Modifications: In bold**

**Staff's suggested modification to the General Plan Update's text (if any)**

Edits to the original text are represented by Underlines (additions to the County language) and ~~strikeouts~~ (deletions).

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#### **Original Text:**

*"Use the Precautionary Principle and greenhouse gas reduction goals adopted by the Board of Supervisors as a guide in all planning decisions."*

#### **Response:**

*This item is best broken into two responses, one dealing with Green House Gasses (GHG) and the other with the Precautionary Principle. The GHG suggestion is best dealt with in section 4-2 (Air Quality). As per the Precautionary Principle modification, the Board of Supervisors has already adopted the principle and it is currently being applied on a trial basis with several County agencies/departments. The Board of Supervisors will be hearing a presentation on the Precautionary Principle in the near future and will determine if any change in its application is warranted.*

#### **Suggested modification:**

***none***

#### **Original Text:**

*"A database will be developed that includes: energy resources, hydrology, geology, soils, slope, water table, vegetation, wildlife, solar access, average wind speed, historic sites, etc. This database which can be overlaid to create suitability maps for agriculture, building, urban development, recreation, conservation, etc. will be used as a basis for all land use decisions."*

#### **Response:**

*County staff does maintain a database of many of these resources assembled from a variety of sources. Staff is amenable to including a modified version of the recommended text.*

**Suggested Modification:**

Add a new bullet to 2-1c

- Ensure that the existing database of County resources (such as soil information, slope analysis, sensitive habitat) is available to guide planning decisions and is kept current.

***Original Text:***

*2-1c: Emphasize compatibility between human activity and environmental resources and processes at all levels from regional planning to site design*

- Require commercial developments and major renovations to be based on the Green Building Council standards, to reach or exceed a specific LEED score<sup>13</sup>.*
- For all building permits, adopt a tiered permit fee structure emphasizing energy / green measures.<sup>14</sup>*
- Mandate a minimum content of 20-25% pozzolanic flyash in local concrete mixes to reduce the county's contributions to the energy expended in cement production and, most importantly, climate change.<sup>15</sup>*

***Response:***

*These items are best addressed within the context of a Green Building set of recommendations to modify the County building codes and will be forwarded to that task force at the appropriate time.*

**Suggested Modifications:**

**- none -**

***Original Text:***

*2-2a: Emphasize long-term and sustainable economic and community objectives over short-term gains.*

- Support the creation and continued existence of an independent energy authority to guide and assist municipal, county, private and commercial interests.<sup>16</sup>*
- Implement a county-wide carbon tax to promote energy and emissions awareness while providing funds to finance programs to shift us towards a reduced or carbon-neutral county.*

***Response:***

*The creation of an independent energy authority could be addressed below in 2-3 Coordination, Partnerships and Funding. No tax recommendations are suggested for inclusion. No modifications are proposed for 2-2a.*

**Suggested Modification:**

Add new bullet to 2-3e:

- For regionally significant issues, investigate the delegation of the regional planning efforts to an existing agency best suited to handle that responsibility or research the feasibility of forming a new entity.

**Original Text:**

2-2d: *Employment and housing opportunities should be balanced within each region to maintain reasonable commute times, worker productivity and a sense of community.*

*The county should ensure mass transit is available to its employees and encourage its use, serving as an example to the rest of the population (a substantial percentage of county workers working in Ukiah live in Brooktrails).*

*Encourage the development of a rail-based commuter system to augment MTA’s bus service along the highway 101 and 20W corridors.*<sup>17</sup>

**Response:**

*The suggested text is not applicable for this section. This recommendation is repeated by EWG later in this document and will be addressed then. No change is recommended for 2-2d.*

**Suggested Modifications:**

**- none -**

**Original Text:**

2-2e: *[new] By 2010 only use economic development dollars to attract industries that are primarily involved with regional renewable resources.*

*County funds should only be used to attract companies that use or manufacture clean renewable energy.*

**Response:**

*The existing text is too restrictive. A modification in language captures the intention without being too restrictive.*

**Suggested Modification:**

**Add a new bullet for 2-2c**

- The use of County funds to attract companies to Mendocino County should be focused on those firms that can produce or utilize renewable energy.**

**Original Text:**

2-3f: *[new] Achieving CO2 emission reduction goals will require coordination between community, city, regional and state organizations.*

*By 2010 the county government officials and staff will host and attend ongoing monthly meetings, at rotating locations, where public and community organizations can present ideas on changes to the general plan that could help mitigate the effects of declining fossil resources and climate change.*

*By 2010 the county will set timelines for integrating suggestions that will reduce hazardous emissions into the general plan.*

**Response:**

*The recommendation to set up monthly meetings on changing the General Plan after its adoption is counter productive. As most reasons to meet focus on reviewing specific implementation measures or technologies, this recommendation is best handled by another*

committee or entity (existing or new) that exists for the purpose of keeping current on changing legislation, building codes or technologies. There is no need include this requirement in the General Plan.

**Suggested Modifications:**

**- none -**

**Original Text:**

*By 2010 a database will be developed that includes: energy resources, hydrology, geology, soils, slope, water table, vegetation, wildlife, historic sites, etc. This database which can be overlaid to create suitability maps for agriculture, building suitability, urban development, recreation, conservation, etc. will be used as a basis for all land use classifications.*

**Response:**

See item 2-1b for incorporated text.

**Suggested Modifications:**

**- none at this section -**

**Original Text:**

*3-1-1 through 4 (All):*

*Mandate tree-lined streets in new (and existing) residential and commercial developments. Encourage 'green roofs' where applicable.*

**Response:**

*Discussion of tree-lined street requirements in new developments can be included in section 3-4. Green Roof discussions are best reserved for the Green Building task force or other entity that has the responsibility for reviewing County building codes.*

**Suggested Modifications:**

**Add new bullet to 3-4c:**

- **Require that all new developments include tree-lined streets and other vegetative treatments that enhance the visual or environmental aspects of the development. Promote the introduction of similar elements into existing communities where feasible.**

**Original Text:**

*3-1-1 through 13 (All):*

*All land use classifications will include a requirement that a minimum of 25% of the estimated energy usage will be provided by onsite renewable energy. Phase this in stages as follows: Electricity 2008 Heating and cooling 2009 Transportation 2010*

**Response:**

*The wording and location of this recommendation is problematic. This recommendation is repeated later in this document. Please refer to section 4-3 for the recommended wording of this recommendation. No change is recommended to 3-1-1 through 13*

**Suggested Modifications:**

**- none at this section -**

**Original Text:**

*3-1-1 through 13 (All):*

*For all developer-created developments, for each residential unit, a requirement that 400 square feet of garden space is set aside with access to enough water for growing fruit and vegetables. Encourage this as green buffers or commons. Implemented by 2008.*

**Response:**

*The wording and location of this recommendation is problematic. The logic behind the recommendation makes sense—for each new residential unit, sufficient space is set aside to meet a small percentage of the incremental demand for food that the new inhabitants will require. This and other non-planning related techniques make up the broader issue of “Local Food” which strives to increase the percentage of food that is produced and consumed locally. The problems with the suggestion as it is currently worded are two-fold. Requiring a set-aside of land poses difficulty when site conditions preclude a garden option. While most single-family projects could probably achieve this space requirement, multifamily projects would likely run into space limitations and conflict with other uses such as playgrounds. The second problem deals with use. Even if multiple gardens were created, there is no guarantee that they would be used correctly or even at all. Encouraging community gardens within the General Plan would be a compromise solution.*

**Suggested Modifications:**

**Add two new bullets to 3-4f:**

- **Encourage the creation of community gardening spaces near new and existing residential areas.**
- **Promote the temporary use of unused urban lots for gardening/food production (with owner permission).**

**Original Text:**

*3-1-1 through 13 (All):*

*By 2008 all land use classifications will include a requirement that a water supply plan is approved for all new developments that assures that stream flows and water table levels will not be negatively impacted by the needs of the development.*

**Response:**

*Defer to Water Agency for specific policy language.*

**Suggested Modifications:**

**None at this time**

**Original Text:**

3-1-1 through 13 (All):

*By 2008 all land use classifications will include a requirement that new housing developments will provide safe and reasonable pedestrian and/or bicycle access to schools, services and employment.*

**Response:**

*This item is best captured in 3-4d, however adding the words vehicular, bicycle and pedestrian specifies a complete level of connectivity.*

**Suggested Modifications:**

**Add additional text to 3-4d**

- **Create vehicular, bicycle and pedestrian connectivity between land uses, including residential, schools, commercial and job centers and open space.**

**Original Text:**

3-1-7 Agricultural lands: Minimum Parcel Size:

*Reduce the minimum agricultural parcel size to 5 acres on the valley floors, 20 acres in the hills to encourage small scale farming, supporting local food production. This should be augmented by (or be adjunct to) greenbelt considerations to prevent islanding of agricultural lands.<sup>19</sup>*

*Agricultural land cannot be taken out of that designation unless replaced by comparable land elsewhere (i.e. protect all agricultural lands regardless of parcel size).*

**Response:**

*No reductions to the minimum parcel sizes for agricultural properties will be recommended; consistent with past Planning Commission directive.*

**Suggested Modifications:**

**-none-**

**Original Text:**

*Encourage, with appropriate agricultural commitments, multiple workers (and their families) living on and working the same property. In cases where more than one dwelling is requested and permitted, restrict such to clustered commons to preserve the primary focus of agricultural activity.*

**Response:**

*This recommendation was previously discussed by the Planning Commission and not recommended for inclusion.*

**Suggested Modifications:**

**-none**

**Original Text:**

3-3b: Allow “mixed use” development (i.e. residences above businesses, etc.).

**Response:**

*This is a good suggestion.*

**Suggested Modification:**

**Add new bullet to 3-3b:**

- Encourage and facilitate mixed-use developments.

**Original Text:**

3-3c: Remove “premature” (agricultural, timber and open space lands should never be converted to urban uses).

**Response:**

*No deletion of existing text is recommended, however staff does feel a better word choice for 3-3c and 4-15e would be “unintended.”*

**Suggested Modifications:**

**Replace the word “premature” with “unintended” in both sections**

**Original Text:**

3-3d: Integrate suburban and urban land use patterns to create walkable mixed use communities that are defined by agricultural, timber and open space ‘greenbelts.’

**Response:**

*The existing text captures 3-3d text captures the greenbelt concept and walkability is expressed in 3-4d.*

**Suggested Modifications:**

**-none-**

**Original Text:**

3-3d: Change the 4th bullet to: “Prohibit” commercial strip development along.....

**Response:**

*An absolute prohibition may not be workable where standards and zoning already permit this form of development. Adding additional text to reference design standards will achieve most of the EWG goals within a planning context.*

**Suggested Modifications:**

**Add the following text to the fourth bullet in 3-3d:**

- Limit commercial strip development along highway corridors on the outskirts of communities by setting community-appropriate design standards and promoting infill and compactness.

**Original Text:**

3-X Agricultural Development [new section]

3-Xa: Encourage wineries to develop methods to capture the CO2 emitted from fermentation and to sequester that which is captured.21

**Response:**

This topic should be best handled by Air Quality Management District and not included in the General Plan document. Other Carbon Dioxide related measures are discussed in section 4-1.

**Suggested Modifications:**

*none*

**Original Text:**

3-6 Industrial Development

3-6b: add "prime agricultural soils" after natural resources: Locate and design industrial sites and uses in a manner that protects natural resources, prime agricultural soils and minimizes environmental degradation and risk from natural or manmade hazards.

**Response:**

Modify the following text in 3-6b:

The inclusion of the suggested text is problematic. The existing text is sufficient.

**Suggested Modifications:**

*none*

**Original Text:**

3-6i: \*Promote and encourage environmentally sound industries and practices that achieve or promote General Plan objectives.

□ Encourage the development of coherent business and industrial parks such that co-location (the use of one business's waste as feedstock for another) and cogeneration (the shared use of process-generated heat) can readily be effected.

**Response:**

This is a good suggestion.

**Suggested Modifications:**

Add the following bullet point to 3-6i:

- Encourage the co-location of industrial and commercial uses where resource inputs can be shared or cascaded and waste products from one could become the raw material for another.

**Original Text:**

*3-6j: [new] Strive to create industrial and commercial ‘parks’ near population centers throughout the county in order to be able to attract potential employers to the population centers.*

**Response:**

*Existing statements in 3-5 and 3-6 provide sufficient protection and guidance for industrial park locations.*

**Suggested Modifications:**

**none**

**Original Text:**

*3-6k: [new] Under new Commercial or Industrial Development, consider requiring a waste disposal and energy use plan as part of the building application process to ensure such items are addressed early on.*

**Response:**

*This is a good idea with some modifications to the original language to make the statement applicable within a planning context.*

**Suggested Modifications:**

**Add new Item 3-6k:**

**Require that new industrial or commercial development projects state their energy, water and waste stream requirements at the time of application.**

**Original Text:**

*3-6l: [new] Promote and encourage cottage scale industry for the production of essential products produced from in-county resources for in-county markets.*

**Response:**

*This is generally a good idea, though staff believes a more generalized approach should be taken. Additionally as this statement does not reference specific land use policies, staff recommends placing it in section 2-2c.*

**Suggested Modifications:**

**New bullet point for 2-2c**

- **Promote small-scale or niche manufacturing utilizing local resources for export or local consumption.**

**Original Text:**

*Light pollution is becoming more and more of a recognized serious problem with impacts reaching into animal migration patterns, astronomy (tourist & research potential), human sleep*

and learning, to most importantly (in our case), energy issues. Inevitably, by reducing the impact of light pollution, the wattage of exterior lighting will be reduced as will the energy consumed.

□ Mandate reflectors on lights and effect a policy governing the percentage of stray light emitted away from the ground by a light installation, commercial, public or private.

**Response:**

Staff agrees that a new sub section on light pollution and usage should be included in the General Plan.

**Suggested Modifications:**

**PMC will fill in the specific policy language.**

**Original Text:**

**3-7c: Health Care [new section]**

Health care for all county residents should be a fundamental concern. With spiraling costs for both insurance and treatment, as well as a growing population without access to basic medical care, the county needs to take a leadership role in identifying potential solutions both through local networks as well as with state legislators.

□ Identify and encourage legislation that will facilitate fundamental health care access to all residents.

**Response:**

Health care access is not energy related. Staff suggests other County agencies pursue this goal as their mission.

**Suggested Modifications:**

**none**

**Original Text:**

Include “develop and encourage distributed renewable power generation” in Infrastructure Overview.

**Response:**

The text suggestions are specific to electric utilities and are similar to other policies in the energy section (4-3). Rewrite the text of point 4-3b to add the word “distributed” while making a few other modifications.

**Suggested Modifications:**

**Item 4-3b re-write:**

**Encourage research and development of distributed, renewable energy sources to meet current and increasing future energy demands.**

**Original Text:**

3-8e: [new] All county and municipal facilities shall undergo an energy audit and that funds be made available to implement the recommendations. The energy audits should be re-occurring

every 5-10 years.

3-8f: [new] As streetlights and other municipal/county outdoor lighting are replaced, LED or other ultra-high efficiency lighting will be the primary consideration.

3-8g: [new] As municipal and county buildings are renovated, solar and other renewable energy generation facilities will be incorporated directly into the building.

3-8h: [new] As county and municipal waste treatment facilities are renovated (e.g. sewage, landfill), methane capture will be obligatory, with its primary use in offsetting the facility's energy costs.

**Response:**

*Incorporating Energy efficiency in our own plans and buildings is essential. Staff agrees that a point referencing County energy efficiency and resource usage is needed in the General Plan, though the specifics are best left to other plans such as the Capital Improvement Plan. Note: Item 3-8h is not applicable to Mendocino County.*

**Suggested Modifications:**

**Add a new point 3-X for “County Services:”**

**Summary: As one of the largest consumers of energy and other resources, the County shall make efficiency and total lifecycle cost accounting a priority for structural, vehicular and equipment purchases and operation.**

***Original Text:***

*3-12b: Locate and design critical infrastructure to withstand and operate during hazard events and subsequent recovery phases.*

*Initiate the upgrade of critical services, including water treatment facilities, to employ on-site renewable energy systems to provide rudimentary operation in times of crisis.*

*3-12g: [new] Retrofit all county schools with stand alone renewable energy systems to support essential loads (i.e. water pumping, food storage... etc.) so they can serve as long-term emergency shelters.*

**Response:**

*This is a good suggestion, though the County government is unable to require that public services or buildings outside of its jurisdiction make the improvements referenced in 3-12g above.*

**Suggested Modifications:**

**Add the following bullets to 3-12b:**

- **Upgrade critical County services to employ onsite renewable energy systems to provide a basic level of operation during an emergency**
- **Increase the County gasoline, diesel and propane storage capacities as to withstand an extended, but temporary disruption of fuel deliveries.**

***Original Text:***

### 3-15 Transportation Systems Overview

*Transportation planning will address the realities of declining fossil resources and climate change within the time frame of the General Plan (the next 20 years) and clearly state a path to reduce oil dependence and greenhouse gas emissions.*

#### **Response:**

*A re-write of the introductory text would be useful to help link the subject of energy and transportation. Staff suggests an alternative passage however.*

#### **Suggested Modifications:**

**Add new paragraph to introductory text.**

**“The subject of transportation is directly linked to energy as all forms of transportation imply a certain level of energy consumption for their construction and operation or use. Therefore an understanding of future energy availability is important when making any transportation decisions.”**

**Add new general points under 3-15**

- **Is not solely dependent on the continuation of fossil fuel resources**
- **Can be maintained, used and justified as available energy sources transition during the duration of the general plan.**

#### ***Original Text:***

*3-15f: [new] Create an enforceable timetable for transitioning the county’s transportation system to be fueled by non-polluting renewable energy (i.e. electric vehicles charged from solar, wind, etc.*

#### **Response:**

*Creating an enforceable timetable for a transition to renewable energy is not part of a General Plan document nor is it really the domain of local government either. Vehicular efficiency is set by the Federal Government and along with the State, they have the power to limit vehicle purchase or operation. The County can only encourage this transition and towards that end recommends adding an additional point to help accomplish this goal.*

#### **Suggested Modifications:**

**New Point 3-15f**

**Facilitate the increased use of electric vehicles by providing opportunities for vehicular charging at County facilities and investigate methods to develop them at other locations as well.**

#### ***Original Text:***

*3-16b: Maximize the use of existing road systems and reduce environmental and community disruption through compatible land use planning.*

*Support the designation of Neighborhood Electric Vehicle (NEV) routes to reduce conventional fossil fuel vehicle in communities.*

**Response:**

The issue of NEV access on roads is governed by state laws and local enforcement. No additional General Plan recommendations need to be made on this subject.

**Suggested Modifications:**

**none**

**Original Text:**

3-16c: [replacement text] Freeway construction encourages continued reliance on cars as the primary mode of transportation and is not compatible with sustainability and conservation of resources.

- [delete Hopland, Willits bypass text]
- Support the construction of neighborhood vehicle routes to relieve congestion on major arterials.

3-16d: Maintain and rehabilitate County roads, bridges and related drainage systems, consistent with Pavement Management System standards and environmental objectives.

- Include bicycle and pedestrian routes in the maintaining and rehabilitation of County roads and bridges

**3-17 Pedestrian and Bicycle Systems**

3-17a: [change to read] All land divisions and other discretionary projects shall provide for pedestrian and bicycle routes along public roadways. And all new developments must ensure that there is safe bicycle and pedestrian access to schools and services.

**Staff Responses:**

The inclusion of the recommended text is unnecessary, nor does staff recommend the deletion of either bypass name. The suggestion for local routes to replace 3-16c is good but fits better as a bullet under **3-16a**. Staff also concurs with the recommendation to include bicycle and pedestrian facilities whenever county roads or bridges are repaired. The issue of safe bicycle and pedestrian access to and from new developments was addressed by the revision to Item 3-4d earlier.

**Suggested Modifications:**

**Add a new bullet under 3-16a**

- **Support the construction or improvement of secondary neighborhood routes to alleviate congestion on the arterials.**

**And add new bullet to 3-17a.**

- **Include bicycle and pedestrian facilities (where applicable) when county roads and bridges are renovated or replaced.**

**Original Text:**

3-18b: *Work with transit providers to coordinate transit routes, services and facilities with development.*

□ *The county should ensure mass transit is available to its employees and encourage its use, serving as an example to the rest of the population (a substantial percentage of county workers working in Ukiah live in Brooktrails).*

**Response:**

*Discussing a detailed concept that meets specific needs of a small segment of the population is not the role of the General Plan. Strategies to reduce employee trips may be applicable as part of County section 3-X portion of this document. However staff does recommend a modification to the text of 3-18b which broadens the level of coordination with transit providers.*

**Suggested Modifications:**

**Modify the text of 3-18b to say:**

**“Work with transit providers to coordinate transit routes, frequency of services and facilities with development throughout the county.”**

**Original Text:**

*Add to summary: Rail transport of heavy goods is several times more efficient than current truck-based transport. The use of rail for public transit must be considered to provide a route towards reducing conventional transportation energy usage and emissions.*

3-19c: *[new] Support the re-opening of the rail lines for heavy freight transportation through this county.*

3-19d: *[new] Encourage the Mendocino Transit Authority (MTA) to negotiate access rights and use of existing rail corridors for fast, energy-efficient, rail-based commuter transit (highway 101 and 20).*

3-19d: *[new] Adopt a plan to secure right-of-way for a rail-based transit system on the coastal corridor (along Hwy 1).*

**Response:**

*Staff agrees with the first two points made above and has included slightly modified versions of both below. We do not agree that it is practical at this point to try and negotiate access for MTA to operate rail-based commuting service along 101 and 20 or secure right of way outside of those corridors. Staff, however recommends investigating the feasibility and potential timing for reintroducing rail along 101.*

**Suggested Modifications:**

**Re-write the Rail Summary to say:**

**Summary: As general rule, rail transport of heavy goods is more efficient than truck-based shipping options, the updated general plan supports continued rail uses. To further achieve those goals, additional emphasis is placed on compatible rail corridor land uses.**

**New policy 3-19a (move the existing ones back):**

**Support the reopening of existing rail lines within the county.**

**New policy 3-19d:**

**Investigate the feasibility and potential timing for the reintroduction of passenger rail along the US-101 corridor.**

***Original Text:***

*3-20c: [new] Long term planning for airports should acknowledge that the energy intensive nature and petroleum-dependence of air travel is not sustainable and future use of airports should be limited to emergency applications.*

***Response:***

*Although aviation will be affected by petroleum availability, no changes to the general plan are necessary as most points deal with safety or land use compatibility. Staff does agree that the Airport Comprehensive Land Use Plan should be updated as changes to the aviation sector occur that would warrant new airport related land-use options.*

**Suggested Modifications:**

**Add new point 3-20c**

**Update the Airport Comprehensive Land Use Plan when changes in the aviation sector or airport use warrant a revision of land use restrictions.**

***Original Text:***

*3-21c: [new] Development plans for harbors and waterways should acknowledge that moving freight by barge or ship is an order of magnitude more energy efficient than moving freight by truck and appropriate handling facilities shall be encouraged.*

***Response:***

*Staff agrees with the concept but has a simpler text recommendation.*

**Suggested Modifications:**

**Add new point 3-21c:**

**Encourage the use of water-based freight movement along the coast where applicable.**

***Original Text:***

*3-22i [new]: Initiate the upgrade of critical services, including water treatment facilities, to employ on-site renewable energy systems to provide rudimentary operation in times of crisis.*

*As wastewater facilities are renovated (e.g. sewage, landfill), methane capture will be obligatory, with its primary use in offsetting the facility's energy costs.*

***Response:***

*The county does not operate or control any water or sewage treatment facilities and as*

consequence, has no control over operational issues. However, staff does recommend the deletion of the third bullet on 3-22b (which starts “Support funding applications...”) and replacing it with the following text.

**Suggested Modifications:**

**Add a bullet to 3-22b**

- **Encourage water and sewer providers to consider energy efficiency or energy recovery technologies when making improvements to their systems.**

***Original Text:***

*3-24 Other Utility Systems*

*3-24c: [new] Support and encourage the creation of a community choice aggregation (CCA) or a community-owned utility at the county level. This would enable the county citizenry to purchase utilities at a block rate and specify the energy mix they desired (i.e., the percentage of renewable energy).*

*□ Under a county-owned utility, allow a small county tax to be added to each kilowatt hour sold to finance energy conservation and renewable energy programs for those that cannot afford it (fixed and low income).*

***Response:***

*A CCA is an intriguing idea and worthy of further study.*

**Suggested Modifications:**

**Add new point 3-24d:**

**Investigate the feasibility of creating a Community Choice Aggregation (CCA) entity for Mendocino to give the County greater control over the cost and sources of our electrical supply.**

***Original Text:***

*3-25 Solid Waste and Hazardous Waste and Materials Management*

*3-25b: Promote materials recovery programs and facilities, focusing on wastes generated in the Mendocino County region*

*□ On-site recycling facilities will be developed such that viable building materials and similar items are removed from the waste stream and made available for public purchase at a nominal cost.*

*3-25d: [new] As landfill facilities are renovated methane capture will be obligatory, with its primary use in offsetting the facility’s (and county’s) energy costs.*

*3-25e: [new] The development of a new in-county landfill facility will be considered a priority. The landfill will reduce county resident’s solid waste costs (through reduced processing and shipping costs) while providing a local energy resource from the methane capture.*

***Response:***

*The policy suggestions made by EWG in regard to waste management issues are beyond the scope of a general plan, inapplicable or not a policy the County intends to adopt in the General*

Plan. Staff will refer these comments to Solid Waste for further review and response.

**Suggested Modifications:**

**none**

**Original Text:**

**4-2 Air Quality**

*Note: The passage of AB 32 adds a whole new category of pollutants to California's air quality laws and calls for dramatic reductions in greenhouse gas (GHG) emissions. Meeting the targets set by the state and the climate change resolution passed by the Board of Supervisors will require a whole new set of policies that do not yet appear in the general plan. Because internal combustion vehicles are responsible for nearly 60% of all CO2 emissions in the county the 3 bullets already included in 4-2g could be re-stated after policy updates (with respect to AB32). Additional policies addressing the GHG emissions from Power Generation, Land Fills, Agriculture and Industry should also be included. 4-2k: [new] Adopt a plan and timeline to eliminate emissions from the transportation sector by replacing internal combustion vehicles with zero emission vehicles (ZEV) to maintain county compliance with AB 32.*

- Implement a county motor pool Zero Emissions Vehicle (ZEV) buy-in program*
- As new developments are approved, ensure electric vehicle charging stations are in place.*
- Focus new development within and around community areas to reduce vehicle travel.*
- Implement transit-and pedestrian –oriented land use and site design strategies.*
- Encourage the use of alternative fuels, energy sources and advanced technology.*

*4-2l: [new] Adopt a plan and timeline for transitioning from fossil fueled power generation to distributed renewable generation to reduce GreenHouse Gas (GHG) emissions.*

*4-2m: [new] Improve building efficiency standards to reduce need for heating fuels.*

*4-2n: [new] Capture or mitigate GHG emissions from landfills and sewage treatment facilities.*

*4-2o: [new] Capture or mitigate GHG emissions from farm, ranch, and vineyard operations.*

*4-2p: [new] Capture or mitigate GHG emissions from industrial sources while encouraging co-generation (recycling of waste heat, etc.).*

*4-2q: [new] By 2010 insure that all cities in the county qualify for the U.S. Department of Energy's Clean Cities program and seek out federal, state and local grant funds to assist county fleet operators in the purchase of zero emission vehicles and needed infrastructure.*

**Response:**

*Many of these suggestions are included implicitly elsewhere in the document. Items pertaining to county motor pool purchasing and operation are best handled in the County Section 3-X. The county will take the approach of creating a separate Green House Gas reduction plan and referencing it in the General Plan.*

**Suggested Modifications:**

**Add new point 4-2k:**

**The County acknowledges the need to reduce Green House Gas emissions and**

will support existing State guidelines and implement any measures that may be forthcoming.

- Create a Green House Gas Reduction Plan for the County that sets specific reduction strategies and targets to meet.

**Original Text:**

4-3a: Add “map” after “Identify”.

**Response:**

Staff is supportive.

**Suggested Modifications:**

**Make the modifications to 4-3a:**

**Add the word “map” after the word “identify”**

**Original Text:**

4-3b: Encourage research and, development and installation of renewable energy sources to meet current and increasing energy demands. [note change in existing text above]

- ☐ Inventory and map solar, wind, and tidal energy resources.
- ☐ Encourage investment in identified renewable resources, either through tax breaks and similar incentives normally offered commercial developers; and/or under the community-owned utility program<sup>30</sup>.
- ☐ Use the California Solar Rights Act to ensure that new building projects do not disrupt solar access.
- ☐ Review all laws that restrict the placement of local distributed energy generating devices such as: wind turbines, solar arrays, wave energy devices, etc.; and eliminate those restrictions that are based on aesthetic preference.
- ☐ Ensure the Assessor’s Office follows California Tax Code, section 73 that excludes solar energy systems in property tax calculations. This exemption should be properly interpreted to include the supporting structure and inverter/battery enclosure, as long as it is not part of a structure used for living or business.
- ☐ Create an ordinance to protect renewable installations (solar, wind, etc.) from vandalism and/or theft (regardless of government, commercial or private ownership).

**Response:**

Staff agrees with a number of the points made above in regard to categorizing and promoting renewable energy and has included revised recommendations below. The remaining points made are sufficiently covered by state and local law or ordinances.

**Suggested Modifications:**

**Revise 4-3b slightly:**

**“ Encourage research and development of distributed, renewable energy sources to meet current and increasing future energy demands.”**

**Add new 4-3b bullet points:**

- Inventory and map solar, wind, tidal, geothermal and micro-hydro resources

- Encourage investment in identified resources either through incentives offered to commercial developers and/or under the Community Choice Aggregation model.
- Review all laws, codes or policies that restrict the placement of distributed energy generating devices in the county and suggest changes wherever those restrictions are not supported by health, safety or environmental concerns or where new technologies have rendered past concerns obsolete.

**Original Text:**

*4-3e: Energy efficiency shall be a major consideration in requirement in all land use and transportation planning decisions.*

*[note change in existing text above]*

- Make use of passive solar design a requirement in all new building projects.*
- Encourage the use of bio-mass and landfill gas for projects that can take advantage of the co-generation of heat and electricity.*

**Response:**

*The existing text of 4-3e is sufficient to achieve this. The remaining bullet points are already addressed or better addressed by a green building set of recommendations.*

**Suggested Modifications:**

*none*

**Original Text:**

*4-3h: [new] All new development projects will require a minimum of 25% of the estimated energy usage to be provided by onsite renewable energy. Phase this in stages as follows:*

*Electricity 2008*

*Heating and cooling 2009*

*Transportation 2010*

**Responses:**

*The language is impractical for use in the General Plan. This suggestion and others made by EWG as well as staff can be better accomplished with the following suggestions outlined below:*

**Suggested Modifications:**

**Create new item 4-3f:**

**The county shall create a timetable for all future structures to meet certain energy standards beyond Title 24 to gain approval and permits. The County will determine the timetable and performance standards.**

- **The intent of this policy is to determine a feasible transition to renewable energy use by all future development projects**
- **This action may be combined with the responsibilities of a Green Building Task Force.**

**Original Text:**

*EWG Agricultural suggestions at the conclusion of Appendix 1 of the Report ...*

**Response:**

*These suggestions were made earlier in the EWG document and were not recommended for inclusion in the General Plan Document by staff.*

**Suggested Modifications:**

*none*

— end —