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6/10/02

submitted @
meeting

Comments to the City Commission 6/10/2002 From Dian Deevey

Subject: Conservation Element Policy 1.1.2.

Last week I urged you to change this policy to include additional important environmentally sensitive areas that require protection.

My ground are many:

1. The city department of Parks and Nature has prepared a report ranking environmentally sensitive areas in terms of the presence of rare threatened or endangered plant and animal species. Using standards common in the field, the ranking system places a very high value on properties that are large and pristine, and little value on areas that are small, may have only common animals and plants, and have been invaded by exotic species or require considerable maintenance. The report consists only of a description of the ranking method and five maps on which the parcels considered are mapped, and their ranks color coded. These parcels are not identified in any way—parcel number, size, etc. The scores assigned to them for various factors are not presented. Nothing is reported about what is on each of the parcels. Most important, there is no indication at all of what proportion of each property consists of environmentally sensitive land. Finally, the public cannot purchase copies of this report, as all the ones originally printed have been distributed. (I was given a copy but I think it is the last one available.)
2. There are many other reasons for preserving property, especially in the urban environment. Land that is not pristine and offers no habitat or rare or endangered plants and animals may nevertheless offer many wildlife values especially valued by city dwellers. The functions such lands perform should be analyzed.
3. The proposed ranking system does not consider other extremely important roles environmentally sensitive lands play in our city. These include the protections for city creeks and water resources. The commission has authorized a study of our watersheds which will identify especially important lands and wetlands that must be preserved. There is no procedure in the entire comp plan that provides a mechanism by which such protections can be established, once such lands are identified. This policy is the appropriate place.
4. As per a request by city staff, I drafted new language for policy 1.1.2 and two related policies. Staff has decided not to revise this policy as directed by the city last week, and I do not know why. I attach a copy of the email containing my draft language that I sent to Dean Mimms in response to his request.

Dian Deevey

-----Original Message-----

From: Dian Deevey [mailto:diandv@bellsouth.net]

Sent: Wednesday, June 05, 2002 3:36 PM

To: Dean Mimms

Cc: Tom Saunders

Subject: New words for the ocmp plan

Drafting this is harder than I thought.

Policy 1.1.2 needs to be changed, but also other policies, too.

Suggestion for policy 1.1.2:

"The city shall identify environmentally significant areas that deserve protection, using available inventories and other means to assess the role of natural areas to the preservation of species of special concern; to the preservation of animal and plant populations that may not be rare, but contribute important ecological values to the urban environment; to the preservation of important geological and historical resources; and to the preservation of wetlands and related systems that play a critical role in preserving and improving surface and ground water resources within the city's watersheds."

Other related policies are under Objective 2.4 Perhaps you should add at the end a proviso and that puts everything identified in accordance with policy 1.1.2 under this protective umbrella, so that when such areas are identified, you can change the land use LDRs to protect them?

Perhaps you could do this by substituting the following words after the last semi-colon Objective 2.4

"other plant and animal habitats deemed ecologically significant within the urban environment; wetlands and related systems that play a critical role in preserving and improving and surface and groundwater resources within the city's watershedsra ; and adopt land regulations to prevent the spread of invasive vegetation."

You may wish to amend 2.4.1 by changing the middle sentence to read:

When additional resources are identified as per policy 1.1.2 or other policies in this element, the properties containing them shall be subject to regulations appropriate to the regulations keyed to the resource present on the property.

I hope this helps. Feel free to contact me with questions.

Dian