

Highlands County Comprehensive Plan Update

Supplement for the DRAFT Natural Resources Element

Edits Noted from the November 17, 2009 Joint Highlands County Board of County Commissioners and Planning & Zoning Commission Workshop

This handout is a **supplement** to the Draft Natural Resources Element which can be found at the CFRPC website at www.cfrpc.org.

Below are discussion items/recommendations brought forward at the November 17, 2009 Joint Board of County Commissioners and Planning & Zoning Commission Workshop. General edits (such as grammar and punctuation) have been noted and will be carried forward to the public hearing drafts.

Underlined text is text that is proposed to be added to the Comprehensive Plan. ~~Strikeout~~ text is text that is proposed to be removed from the Comprehensive Plan. Please note that the **highlighted text** are suggestions that were provided at the November 17, 2009 Workshop. The **Comments** listed under each objective or policy below denote why the highlighted text is provided.

Workshop Points Noted - Draft Natural Resources Element

Policy 1.7 **Review Process for an Archaeological Reconnaissance Survey and Historic Significance Survey Report**

Whenever a particular site is in an area where historical and archaeological resources are mapped on the Archaeological Sensitive Areas Map, or contained in the Florida Division of Historic Resources Master Site File, or are known to occur, the applicant shall be required to submit an Archaeological Reconnaissance Survey (ARS) or Historic Significance Report (HSR), as applicable, to the Planning Department for review by the Highlands County Historical Preservation Commission. Findings and recommendations from the ARS or the HSR shall be ~~and incorporation~~ **considered** in the County Land Clearing Permit, Building Permit or other Final Development Order, ~~as otherwise described in paragraphs F and G of NRE Policy 3.3, substituting the Highlands County Historical Preservation Commission for the Highlands County Natural Resources Advisory Committee and/or the Natural Resources Conservation Service.~~

Comment: *Changed the term "incorporated" to "considered". Staff is working on further clarification language with regard to County staff review and BOCC approval.*

Policy 2.4 **Mining Operations Plan**

A. ~~Effective immediately,~~ mining Mining operators shall submit a "Mining Operations Plan" with their permit application. The County Engineer shall

approve, conditionally approve, or disapprove all proposed Mining Operations Plans, the content of which shall include:

1. A Mine Area Layout Plan which describes the type of mining operation and the methods being used to extract site resources, maps mining activities and locates any permanent structures or roads at the mining site or water bodies on or near to the mining site, and establishes methods and locations for waste storage;
2. A Schedule of phased mining activities;
3. An Impact Mitigation Plan based upon the mining EIR;
4. A Traffic Circulation Plan showing major access routes to and from the mining site, a description of the type of transport vehicles used (including their gross loaded weights), and a general schedule of transport times; and,
5. A Mining Site Reclamation Plan which is prepared in accordance with local regulations the County's Land Development Regulations and, where applicable, Chapter 62C-16.0051, FAC and Chapter 380 F.S.
- ~~6. A Landscaping Plan with native and / or appropriate vegetation to ensure soil stability and aesthetics;~~
- ~~7. A five year Monitoring Plan for any areas of the mine that retain water to ensure that desirable aquatic and wetland vegetation will thrive and persist;~~
- ~~8. A periodic Groundwater Monitoring Plan, with specific set of parameters to be tested (at least semi-annually), to monitor the impact of activity to groundwater resources;~~
- ~~9. A Mine Area Layout Plan that should include distances to the nearest water resource (lake, river, wetland, etc~~
- ~~10. A Mine Grading Plan.~~

Comment: *It was recommended that A.1. be amended to provide the additional highlighted language. It was stated that A.6. through A.8 and A.10. may be better located in the Land Development Regulations and do not need to be referenced in the Comprehensive Plan. It was stated that A.9. is repetitious of A.1. and should be removed.*

Objective 3 Protect Conservation Land

The County shall protect Native Vegetative Communities identified herein which are endemic to Central Florida and shall restrict activities known to adversely affect the Endangered and Threatened Species and their habitat. This will be a ~~an~~ joint

effort with state, federal, not-for-profit entities, and for-profit private entities ~~And Shall Restrict Activities Known To Adversely Affect The Endangered And Threatened Species And Their Habitat.~~

Comment: Added wording from a Workshop recommendation.

Policy 3.2 Map Resources on Conservation Overlay

Comment: There was discussion at the Workshop regarding whether to include A.7. through A.10. The Planning & Zoning Commission said that they would make a recommendation regarding this policy during their hearing on the EAR-required amendments. It was recommended that the source of the Selected Natural Resources Map be cited in the Comprehensive Plan.

Policy 3.3 Environmental Clearance Process

A. Environmental Clearance Process and Determination by Development Services Director:

- ~~1. Except as provided in NRE Policy 3.4, the The Development Services Director shall make an Environmental Clearance Determination prior to the issuance of a County Land Clearing Permit or Building Permit except as provided in NRE Policy 3.4.~~
2. Environmental Clearance Not Required: The Development Services Director shall make the Environmental Clearance Determination without further review whenever a particular site is not in an area where the Conservation Overlay Map shows the resource categories listed in NRE Policy 3.2, unless resources are proven known to exist on that particular site or information has been provided to the County through development of the Greater Ridge Conservation Planning Tool, the U.S. Fish and Wildlife Service Habitat Conservation Plan (HCP) or other adopted County resources.

Comment: There was discussion at the Workshop regarding whether to remove the underlined text in Policy 3.3.A.2. There was also discussion on whether or not to keep the first part of the underlined text stating: "...unless resources are known to exist on the particular site ..." and to remove the second part of the underlined text stating, "...or information has been provided to the County through development of the Greater Ridge Conservation Planning Tool, the U.S. Fish and Wildlife Service Habitat Conservation Plan (HCP) or other adopted County resources." Further discussion included removing the reference to the HCP since it is not an adopted County resource.

It was recommended that the word "proven" be added to Policy 3.3.A.2.

The Planning & Zoning Commission said that they would make a recommendation regarding this policy during their hearing on the EAR-required amendments.

Policy 3.3

Environmental Clearance Process

3. Environmental Clearance Required:

- a. Whenever a particular site is in an area where the resource categories listed in NRE Policy 3.2 are mapped on the Conservation Overlay Map are proven known to exist on that particular site, or information has been provided to the County through development of the Greater Ridge Conservation Planning Tool, the U.S. Fish and Wildlife Service Habitat Conservation Plan (HCP) or other adopted County resources, are known to occur, and the applicant submits to the Planning Department an Environmental Clearance Report, valid for a period not to exceed 5 years from the date of issuance, which has been prepared by a professional, firm, government agency, or institution. For purposes of this policy, the term "known to occur" means any information received from a County approved professional, government agency with appropriate jurisdiction, any scientific study, or any reference material contained in this plan or the base documents that supported development of the plan.

Comment: Text added to provide consistency with Policy 3.3.A.2.

- b. Notwithstanding Policy 3.3.A.3.a., Environmental Clearance Reports, and review are required (unless otherwise exempted or an appropriate substitute as allowed) for:
 - (1) Large Scale Comprehensive Plan Amendments;
 - (2) Re-Zones, Site Plans and Plats, consisting of an area greater than 10 acres, or 50 lots or more regardless of the acres.

Comment: There was discussion at the Workshop to leave in and not strikeout the text in Policy 3.3.A.3.b.2. above.

Policy 3.3

Environmental Clearance Process

5. Environmental Clearance required for endemic habitat and species that have no state or federal protection: Whenever a particular site has endemic habitat or species that are known to occur but not protected by a state or federal agency, an Environmental Clearance Report, if recommended by the Natural Resources Department (NRD) and or the Natural Resources Advisory Commission (NRAC), shall be required. The NRD and NRAC will make the environmental clearance recommendation to the Development Services Director.

Comment: Workshop discussion included: potentially removing this proposed policy; and providing a policy that would be "incentive-based". Staff is researching an incentive-based approach and alternative language.

Policy 3.4

Mitigation Fee for Exempt Lots

- A. For purposes of implementing Policy 3.3, so long as landowners comply with state and/or federal regulations in areas of natural resources that would otherwise be required to undergo environmental clearance, the County shall exempt the following from environmental clearance upon payment of an environmental mitigation fee to be set by the Board of County Commissioners. An environmental mitigation fee for exempt lots, recommended by the U.S. Fish and Wildlife Service (FWS) as adequate mitigation for loss of protected resources, shall be incorporated into the Schedule of Fees by 2011.

An environmental mitigation fee for exempt lots shall be periodically reexamined while considering the recommendations by various agencies such as the U.S. Fish and Wildlife Service (FWS).

Comment: Alternate wording for Policy 3.4 was discussed at the November 17, 2009 Workshop to provide for a more general, less restrictive policy.

Policy 3.5

Measures for Environmental Conservation

Comment: Workshop discussion included providing Policy 3.5.D. as a subheading under Policy 3.5.C. and also relocating both of these policies to Policy 3.14.F. Please see the edits below in Policy 3.14 that reflect this recommendation. It was recommended that letter i. below include reference to other land uses with regard notifications of fire management.

There was also discussion about removing Policy 3.5.E. as it was thought to be duplicative of policies in the Transportation Element.

Policy 3.14

~~Setback from~~ Protection of Environmentally Sensitive Land

- F. Forestland, rangeland, wildlife management areas, parks, preserves, and other areas for public use depend on prescribed burning for reforestation, removal of exotics, nutrient cycling, quality and quantity of herbaceous vegetation and the perpetuation, restoration and management of many plant and animal communities to maintain specific economic and ecological resource value. Florida Statutes recognizes prescribed burning as being in the public interest and does not constitute a public or private nuisance when conducted under applicable state air pollution statutes and rules. The County shall pursue recognition mechanisms such as require deed restrictions on lots or acreages in areas that may experience smoke and air particulates from prescribed burning on agricultural and conservation lands. Highlands County considers prescribed burning a necessary management strategy of forestland, rangeland, wildlife management areas, parks, preserves, and other areas for public use.
- G. Recognizing that many of the Mega-Lot Subdivisions platted in the 1960's and early 1970's are generally not consistent with current use practices and growth management strategies aimed at discouraging sprawl and protecting environmentally significant lands, the following shall apply to these

subdivisions in particular and to all public and private conservation areas in general.

- i. Residential projects developed adjacent or in close proximity (500 ft.) to conservation areas or other land uses that use fire management, and approved subsequent to the adoption of this policy, shall be required to notify buyers and potential buyers of the adjacent conservation area. Specifically, buyers and potential buyers must be informed of the possibility of any fire management program for the adjacent conservation area or other land use that uses fire management, and be explicitly told that that they may experience smoke and odors from these fire management practices.

Policy 3.7

Conservation Trust

- B. The Conservation Trust Fund account may also be used for the following:
 1. Restoration of lands purchased that will be preserved as conservation easements.
Any improvements, enhancements, or creations of ecosystems or habitats,
 2. Acquisition of lands that will result in alleviating usage stress and / or disturbance to previously acquired and managed lands which contain threatened and endangered species and endemic ecological communities,
 3. Management and maintenance of existing acquired lands, including construction of fences and / or barriers designed to protect the lands from vandalism and disturbance.

Comment: The Workshop recommendation for Policy 3.7.B.1. was to clarify the policy to specify "restoration" and to remove the proposed language.

Policy 3.8

Exotic Plant Control Program

- A. The County shall, ~~within the planning period,~~ continue to devise and implement a program for the removal and control of exotic pest plant species, ~~including Hydrilla, Water Hyacinth, Brazilian Pepper, Melaleuca, Australian Pine, Downey Myrtle, Chinaberry, Chinese Tallow Tree, Tropic Soda Apple, Cogon Grass, Old World Climbing Fern, and Air Potato.~~ The County hereby adopts the Florida Exotic Pest Plant Council List of Exotics in order to implement this policy.

Comment: There was Workshop discussion to remove the proposed language and to refer to a list from the Florida Department of Agriculture. Staff is consulting with the County's Natural Resources Department for list clarification.

Policy 3.9 **Agricultural Best Management**

Comment: Staff is working to provide an inclusive list of agencies and reference manuals for this policy and throughout the Element.

Policy 3.11 **Wildlife / Greenway Corridor Strategy**

- A. Ecological and Habitat Connectivity as Part of the Development Review Process
As a measure to promote a conservation strategy for the establishment of wildlife/greenway corridors within the County, new development plans, including roads, shall identify existing conservation areas, protected areas, waterways and wildlife / greenway corridors as shown on the Conservation Overlay Map, adjoining the project site. ~~This shall include an assessment, alternative improvements or routes shall be identified and selected to meet the required development and or transportation needs. (see also TE 3.10)~~

Comment: Clarification language has been added in follow up to the Workshop. There was also discussion to remove the last sentence of Policy 3.11.A.

- B. Contiguity
~~Through the year 2030, the~~ The County shall require, whenever applicable and feasible, projects that plan to designate on-site dedications for conservation purposes to locate them contiguous when next to an existing conservation area.
- C. Greater Ridge Conservation Planning Tool
~~The County shall adopt the Greater Ridge Conservation Planning Tool and incorporate it into the Conservation Overlay Map. By December 2011, the County will amend the Conservation Overlay Map to show adopted wildlife/greenway corridors as a means to identify significant environmental and wildlife corridors, such as the Arbuckle Creek - Carter Creek - Morgan Hole Creek corridor, the Fisheating Creek corridor and the Josephine Creek-Yellow Bluff Creek corridor, among others, and reinforce~~ ~~NRE~~ ~~this Policy 3.11~~ by designating these greenways on the FLUM with a Conceptual Plan Line (CPL) for the purpose of guiding development and restricting activities, as indicated in A and B, known to adversely affect the endangered and threatened species and their habitats.

The County shall also provide consistency with Policy 1.7.1 of the Strategic Regional Policy Plan (SRPP), where applicable, by identifying those greenway corridors, designated by the Central Florida Regional Planning Council (CFRPC) as having regional significance within Highlands County, on the Conservation Overly Map series.

Comment: The highlighted text represents a recommendation provided at the Workshop.

- D. Discourage New Roadway Crossings ~~Near~~ Through Wildlife / Greenway Corridors

Where new crossings are necessary to ensure the health, safety and welfare of the citizenry, transportation corridors shall be designed as limited access

facilities that prohibit non-emergency stopping. Roadway and associated utility corridors shall be designed to have minimal adverse impacts to the environment and shall include provisions for wildlife crossings based on ~~accepted standards~~ the standards of Florida Fish and Wildlife Conservation Commission (FWC) and the U.S. Fish and Wildlife Service (FWS). (see also TE 3.10, NRE 3.22)

Comment: The highlighted text represents revisions recommended at the Workshop.

Policy 3.13 Land Clearing

- A. **Definition:** Land Clearing means engaging in a land management practice or practices, which will result in the destruction of natural resources (as identified on the Conservation Overlay map; i.e., xeric uplands, cutthroatgrass seep, or wetlands), with the natural resource being replaced or succeeded by something else (e.g. bare soil, different resource type, or invaded by non-native species) which precludes the long-term (5 years) recovery of the original natural resource type. Land clearing activities which impact listed species may also be subject to state and federal regulation.

Comment: It was discussed at the Workshop that it would be better to leave in the last sentence of Policy 3.13. It was proposed to be removed.

Policy 3.15 Mitigation Options

In accordance with the preservation priorities established by Policy 3.--, the County may allow the following options to all affected developments upon approval of the Board of County Commissioners:

- A. On-site Option: provision of the required acreage as a public or private conservation /open space easement;
- B. Off-site Option: provision of the required acreage at an approved off-site location;
- C. In-lieu Option: contribution to the County's Conservation Trust Fund amounting to the fair market value for comparable acreage; or,
- D. Sale to the Federal, State, or local government, or a not for profit corporation purchasing for conservation purposes, including mitigation for the loss of wetlands by either one of the Water Management Districts regulations; or
- E. County requires no further mitigation if any State, Federal or regulatory agency is already requiring mitigation. Then such mitigation may meet County mitigation options and no additional County mitigation may be required; or,

- F. County Mitigation Bank, payment of funds equal to the value of the land being mitigated, into a mitigation bank in Highlands County for use within the County or;
- G. A combination of the above options.

Comment: Workshop recommended edit.

Policy 3.2019 ~~10-Year Priorities for Acquisition of Environmentally Sensitive Lands~~

Highlands County supports the acquisition of environmentally sensitive lands to achieve permanent protection for future generations. The Board of County Commissioners recognizes these efforts are best achieved through a combination of public and private efforts including fee purchase, easements, transfer of development rights, donations and other less than fee mechanisms. **The Board of County Commissioners shall adopt a target list of priorities for acquisition.**

~~Upon completion of the mission objectives outlined for the Natural Resource Advisory Commission under Policy 3.18, the Board of County Commissioners shall adopt a 10-year target for the acquisition (including fee purchase, easements, donations and other less than fee mechanisms) of natural resource lands pursuant to the priorities expressed in Natural Resources Policy 3.5: Measures for Environmental Conservation. The County shall review progress toward achieving this target during the next Evaluation and Appraisal Report.~~

Comment: The highlighted text has been added per discussion at the Workshop that identified the need to cite the list of priorities.

Policy 3.221 **Environmental Conservation of Selected Lands**

Comment: Staff is continuing to work on this policy to clarify the language and consider incentives. Workshop discussion included removal of the policy.

Policy 3.232 **Planned Transportation Improvements and Alignments in Relation to Environmental Issues**

Ensure that the transportation network will avoid, minimize, and mitigate habitat fragmentation by applying the following wildlife design criteria:

1. Require that wildlife habitat linkage analysis be used as a standard procedure for transportation facilities planning.
2. Design wildlife crossing structures for multiple species and sustained habitat connectivity.
3. Provide fencing or barrier walls to direct wildlife to crossing entrances.

4. New roadway crossings near through wildlife / greenway corridors are discouraged. Where new crossings are necessary to ensure the health, safety and welfare of the citizenry, transportation corridors shall be designed as limited access facilities that prohibit non-emergency stopping. Roadway and associated utility corridors shall be designed to have minimal adverse impacts to the environment and shall include provisions for wildlife crossings based on ~~accepted standards~~ the standards of Florida Fish and Wildlife Conservation Commission (FWC) and the U.S. Fish and Wildlife Service (FWS).

Comment: This policy is being reviewed for repetition within the Element. The edits above are based on Workshop discussion. Staff is working on clarification with regard to "wildlife habitat linkage analysis".

Policy 4.1

Measures to Protect Wetlands

In addition to the provisions of ~~Natural Resource~~ NRE Policy 3.14, the County shall protect the ecological functions of wetland systems by the following actions:

- A. Support the restoration of the wetland systems, where feasible, including the Kissimmee River Restoration Project, and implement local initiatives recommended by the Phase II Technical Plan for the Lake Okeechobee Construction Project.

Comment: Added language lists on-going local restoration projects as examples.

- B. Protect the natural functions and hydrology of wetland systems, including cutthroatgrass seeps, by buffering against incompatible land uses and by mitigating development impacts to the system in accordance with applicable natural resource policies.
- C. Provide clustering and open space buffering protection for the Arbuckle Creek/Lake Istokpoga wetland and floodplain systems and basin.
- D. Through intergovernmental cooperation with Polk County, promote the designation of the Lake Arbuckle, Arbuckle Creek, and Lake Istokpoga system as "Outstanding Florida Waters".
- E. Acquire (including fee purchase, easements, donations and other less than fee mechanisms) wetlands systems, including cutthroatgrass seeps
- F. ~~Do not encourage~~ Discourage efforts to channelize natural pristine waterways.
- G. The County should consider incorporating the agricultural and urban best management practices, water storage, water quality improvement, and environmental services projects included in the Phase II Technical Plan for the Lake Okeechobee Construction Project that target the enhancement and restoration of wetlands into land development regulations. These management measures can benefit impacted wetlands through the dynamic storage of water, assimilation of nutrients, and restoration of hydro-periods.

Comment: The word “consider” has been added. Updated policy references will be provided in public hearing drafts. Staff is working to reword this policy.

Policy 4.32 Map Wetlands on Conservation Overlay

The County will, ~~within the planning period, continue to administer,~~ **develop** **continue to refine** as part of the Future Land Use Map series, a Conservation Overlay Map series which shall generally map wetland systems and shall serve to assist in the interpretation and application of resource protection criteria, as specified in policies throughout this element.

~~Until the maps are developed, the County will continue to administer the current Conservation Overlay Map series. The maps shall be updated as data are acquired. Wetlands shall be generally identified by location, size and function by means of the Conservation Overlay Map series, and specifically identified and evaluated as to their type, value and condition at the time an Environmental Clearance Report (ECR) is prepared.~~

Comment: Revised wording was proposed at the Workshop since the County has already developed the Conservation Overlay Map series.

Staff is currently drafting exemption language, on-site verification, etc. for Policy 4.2.

Policy 4.6 ~~Wetlands buffers shall be required within the LDRs, with widths determined based on their ecological value, particularly associated with fish, wildlife resources and vegetation.~~

Comment: It was recommended that the proposed new Policy 4.6 be removed. It is not an EAR recommended policy and it an item better addressed by the Land Development Regulations.

Policy 76.1 Measures to Protect Groundwater Quality and Quantity

~~Upon adoption, the County shall initiate the following measures, in addition to policies contained in the Potable Water Service Objective and other policies of this Element, to~~ The County shall protect the water quality of high recharge areas and wellfields:

- A. ~~Requiring all requirements for~~ Require all new development and redevelopment to obtain approvals from all responsible government agencies whenever there is a potential for the proposed project to contaminate or to degrade existing water quality;
- B. ~~Requirements for~~ natural buffers, set asides, and building setbacks pursuant to the policies of this Comprehensive Plan;

- C. ~~Support for acquiring~~ Acquire and support acquisition by other agencies (including fee purchase, easements, donations and other less than fee mechanisms) xeric uplands on the Lake Wales Ridge which are important to the aquifer and for their habitat value or natural scenic features;
- D. ~~A requirement that:~~ Require (1) all new development and redevelopment within a High Recharge Area as defined by the Water Management Districts, shall not reduce an aquifer recharge area's volume and rate of recharge; and that, (2) subsurface storage and flow shall simulate predevelopment conditions whenever development is proposed in a High Recharge Area;
- E. ~~Utilization of~~ Utilize the Natural Resources Conservation Service Soils Survey for Highlands County South and Southwest Water Management District designations as the principal means to indicate the aquifer recharge potential of lands soils within future urbanization patterns; geology, as well as soil types, are important elements in mapping recharge areas.
- F. ~~Evaluate new data developed by the South and the Southwest Water Management Districts relating to aquifer recharge areas, particularly for identifying High Recharge Areas in Highlands County.~~

Comment: Highlighted revisions to Policy 6.1 are based in discussion at the Workshop.

Policy 7.56.3 LDRs Resulting from Central Sewer Study

~~Appropriate Amend~~ LDRs will be prepared to implement the recommendations of the Central Sewer Study Committee's report ~~within one year of its submission or on June 1, 2001.~~

Comment: Staff is reviewing this policy for consistency with the Infrastructure Element.

Policy 7.136.10 Environmental Impacts on Aquifers

~~Policies 2.1 and 3.3, the~~ The County Engineer may require the collection of site specific hydro-geologic data (including soil borings or differences in the potentiometric head pressure of the aquifers involved) when the impacts of a proposed use have the reasonable potential to deplete or degrade the aquifer.

~~This information shall be incorporated into the Environmental Impact Report and used on a case by case basis for any recommendations given in the report.~~

~~In addition,~~ a Consumptive Use Permit, Environmental Resource Permit, or other such permit as required (or an exemption from such permit) shall be obtained from the appropriate Water Management District (WMD) (See Also Policies -- & --).

Comment: This edit was discussed at the Workshop. The Environmental Resource Permit and Consumptive Use Permit address the requirements. The first two paragraphs are not needed.

Policy ~~9-48.3~~ Prevent Water Contamination

Comment: This Policy will be updated for consistency with the Infrastructure Element.

Policy ~~9-6-8.5~~ Protect the Natural Environment

The County ~~may~~ **will** seek assistance from the coordinating agencies for the Northern Everglades and Estuaries Protection Program to determine whether a monitoring program is needed to monitor the environmental impacts of any legally permitted public, industrial, or agricultural water use ~~in accordance with the goals, objectives, and policies of this Comprehensive Plan, Florida Statutes Chapter 163, and Florida Administrative Code 9J-5~~ and take appropriate action when necessary.

The specific environmental impacts to be monitored include the impacts on wetlands, cutthroatgrass seeps, and xeric uplands and other protected natural resources identified in the Natural Resources Element Objectives 3 and 4. The coordinating agencies for the Northern Everglades and Estuaries Protection Program include the Florida Department of Environmental Protection, the Florida Department of Agriculture and Consumer Services, and the South Florida Water Management District.

Comment: Language revised per Workshop comments.

Policy ~~87.5~~ Water Conservation Program

The County will continue to implement a water conservation program, which will be formulated in coordination with the water management districts, and will include, at a minimum:

- A. Public education components; and,
- B. Consideration of further water conservation measures, including water reuse, conservation oriented rate structures, **a mobile irrigation lab**, and implementation of leak detection systems.
- C. Consideration of implementing a mobile irrigation laboratory.

Comment: Language added from Workshop discussion.

Policy ~~109.1~~ Kiosks for Parks

Policy ~~109.2~~ Curriculum for Schools

Comment: Policy 9.1 and Policy 9.2 are being updated in coordinating with information from the Natural Resources Department.