

# **DISTURBANCES IN ENVIRONMENTAL QUALITY CORRIDORS ENVIRONMENT COMMITTEE WORKSHOP JANUARY 6, 2010**

## **COMMENTS AND STAFF RESPONSES FEBRUARY 24, 2010**

### **TOPIC A: STORMWATER MANAGEMENT FACILITIES**

#### **ISSUE A.1: REGIONAL PONDS**

**Mike Rolband:** Reconsider the policy regarding location of wet ponds in EQCs. Wet ponds have many benefits that embankment-only ponds don't. They provide recreational value (e.g., Burke Lake). They also provide regional stormwater management benefits, which will become more important as the TMDL (Total Maximum Daily Load) for the Chesapeake Bay is developed. We will need to do something to reduce sediment loads, which are coming largely from in-stream erosion. Regional ponds are an approach to doing this, and it is likely we will need to provide for this approach. Please provide more flexibility for regional ponds.

Proposed change (in bold type):

- They will:
  - Be more effective in protecting streams and better support goals of watershed management plans than stormwater management measures that otherwise would be provided outside of EQCs; **and**
  - Replace, enhance and/or be provided along with other efforts to compensate for any of the EQC purposes, as described above, that would be affected by the facilities; **or**
  - **Contribute to achieving the TN, TP, or TSS reductions desired by a local watershed TMDL, Chesapeake Bay TMDL, or MS4 Permit.**

When stormwater management facilities within the EQC are determined to be appropriate, encourage the construction of facilities that minimize clearing and grading, such as embankment-only ponds, or facilities that are otherwise designed to maximize pollutant removal while protecting, enhancing, and/or restoring the ecological integrity of the EQC, **such as wet ponds with sediment forebays and wetlands benches or stormwater wetlands with sediment forebays and micropool outlets.**

**John DeNoyer:** The shift in emphasis away from regional stormwater management facilities is welcomed. There are many situations where the construction of regional ponds in EQCs is totally inappropriate. If there is a need for sediment-capturing ponds

within stream valleys, maybe we should encourage beavers, which cut down trees but which enhance habitat value in the process.

**Ann Csonka:** Glad to see that the emphasis is no longer on regional ponds, although Mr. Rolband's points are well taken.

*Staff response: There is nothing in the proposal that would preclude the consideration of regional ponds. However, the county's perspective on regional ponds has changed over time. They are no longer considered to be the preferred approach but are considered to be one tool in our tool box. They may be appropriate in some cases and inappropriate in others. Staff feels that the language that has been developed is appropriate and allows for a case-by-case consideration of the benefits and impacts of regional ponds. We note that the existing language supports "facilities that are otherwise designed to maximize pollutant removal while protecting, enhancing, and/or restoring the ecological integrity of the EQC" and feel that this, along with the bullets establishing the circumstances under which disturbances for stormwater management facilities should be supported, is the appropriate approach to take. We have left the language regarding embankment-only facilities in as a way of providing an example of a design approach that would serve to minimize adverse impacts, and we don't feel that anything has changed to warrant the deletion of this text. However, if there is a concern that there is undue emphasis being given to one possible design over another, we'd recommend that the specific reference to embankment-only facilities be deleted. We do not feel that the language being recommended by Mr. Rolband should be added but would note that the pond design he supports could still be considered on a case-by-case basis.*

*In regard to the TMDL/MS4\* permit issue, we feel that there is merit in recognizing through Plan policy a need to support efforts to meet water quality standards and/or permitting requirements, and we thank Mr. Rolband for identifying this concern. However, we would recommend Plan text that focuses more broadly on water quality standards rather than the TMDL component of the issue. Further, we note that Mr. Rolband would replace the "and" from the bullet point list with an "or," which would have the effect of reducing the expectations that would be associated with proposals to locate stormwater management facilities in EQCs (i.e., there would be no expectation that efforts would be pursued to compensate for affected EQC purposes). Mr. Rolband's suggested text would also not establish any consideration as to whether the contribution to meeting TMDL or MS4 goals could be established through alternative means that would not require disturbances to EQCs. Staff feels that such a test would be appropriate, as would be text establishing an expectation for mitigation of EQC purposes that would be affected by the construction of the facility. Staff therefore recommends the following revisions to the Strawman Draft Plan Amendment as it relates to Objective 2, Policy d, with the understanding that similar revisions would be proposed for the parallel language under Objective 9, Policy a (proposed changes in bold type):*

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\* "MS4" is a commonly-used abbreviation for "Municipal Separate Storm Sewer System." Fairfax County has been issued an MS4 permit pursuant to Virginia Pollutant Discharge Elimination System requirements.

Policy d. Preserve the integrity and the scenic and recreational value of ~~stream valley~~ EQCs when locating and designing storm water detention and BMP facilities. In general, such facilities should not be provided within ~~stream valley~~ EQCs unless they ~~are designed to provide regional benefit or unless the EQCs have been significantly degraded~~ meet one of the following conditions:

- They are consistent with recommendations of a watershed management plan that has been adopted by the Fairfax County Board of Supervisors; or
- They will:
  - **Either:**
    - Be more effective in protecting streams and better support goals of watershed management plans than stormwater management measures that otherwise would be provided outside of EQCs; or
    - Contribute to achieving pollutant reduction necessary to bring waters identified as impaired into compliance with state water quality standards or into compliance with a Municipal Separate Storm Sewer System (MS4) permit in a manner that would be more effective and/or less environmentally-disruptive than approaches that would be pursued outside of EQCs;

and

- Replace, enhance and/or be provided along with other efforts to compensate for any of the EQC purposes, as described in Environmental Objective 9, Policy a below, that would be affected by the facilities.

When stormwater management facilities within the EQC are determined to be appropriate, encourage the construction of facilities that minimize clearing and grading, such as embankment-only ponds, or facilities that are otherwise designed to maximize pollutant removal while protecting, enhancing, and/or restoring the ecological integrity of the EQC.

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## ISSUE A.2: ALTERNATIVES ANALYSES

**Edwin Behrens (a member of the Watershed Advisory Group for the Nichol Run and Pond Branch watersheds):** Any proposal for watershed improvement and control should be developed consistent with prevailing community values as well as cultural and environmental preferences (e.g., in Great Falls, protection of trees and terrain). Where stormwater management ponds are to be considered, there should be an evaluation of alternative approaches and their implications, including visual and other adverse effects on the environment. A project that has been suggested in the Pond Branch watershed is particularly problematic from this perspective.

*Staff Response: Project-specific watershed determinations should be addressed during the watershed management planning process, and that process can consider Mr. Behrens' particular concerns about the Pond Branch watershed project. It is DPZ staff's understanding that the project in question has been dropped from the list of projects identified by the watershed plan consultants, in large part because of input from the Watershed Advisory Group. Mr. Behrens does, though, raise concerns that have broader implications, and it is staff's view that the Strawman draft addresses these concerns appropriately. In staff's view, Plan policy should support any project that is ultimately included in a Board-adopted watershed plan. For projects that are not so included, the Strawman draft would only support them based on an analysis of alternatives (in terms of stream protection and support for watershed management plan goals, which will have been developed through a community-based process, and/or water quality standards or permitting requirements) and based on an assessment as to whether adverse impacts to EQC purposes will have been compensated for. We feel that this is in line with Mr. Behrens' suggestion and that no revisions are needed in response to his comments.*

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## **TOPIC B: HABITAT-RELATED LANGUAGE**

### **ISSUE B.1: GENERAL DEFINITION OF THE “HABITAT QUALITY” PURPOSE**

**Mike Rolband:** The existing and proposed language regarding habitat quality is nebulous. While there is not a concern that existing staff would abuse this language, there is concern that future staff could.

There is, for example, a need for better definition of interior forest species. Which species are we alluding to? The size will vary depending on the species.

Proposed change: See below.

**Inda Stagg:** There is a need for more precise definition within the language being suggested to define “habitat quality.” It is not clear what a “desirable or scarce habitat type” is or one that “could be readily restored.” It is not clear when an area would be considered to “host a species of special interest.” There needs to be a definition of what would constitute a “rare vegetative community.” There is also need for clarification regarding “unfragmented, vegetated areas that are large enough to support interior forest dwelling species.” Finally, the reference to “aquatic and wetland habitats that are connected to other EQC areas” is too vague. There should be an onus placed on the county to justify any area that is recommended for inclusion in the EQC based on the “habitat quality” purpose.

**Ann Csonka:** In regard to habitat and vegetative communities, examples or references could be provided, and there may need to be some further refinement of the language, but the larger issue is a need for everyone to recognize habitat values—this should not be considered to be strange territory.

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*Staff response: As noted in the Strawman document, staff's intent in providing the additional language after each of the EQC purposes is to more fully capture the potential functions and values relating to each of these purposes. In doing so, it is not staff's intent to expand the reach of the EQC system; rather, the intent is to clarify and/or provide examples of each of these purposes. In this particular case, staff's intent is to provide examples of areas that may qualify as "a desirable or scarce habitat type." In staff's view, forests that are both large enough and unfragmented enough to host any of a number of interior forest species would indeed be considered to be desirable and scarce, and the limited number of circumstances during the zoning process where a concern about interior forest habitat has been raised affirms this view. Further, the intent is to recognize the concept of interior forest species rather than any one particular species.*

*In regard to the broader concern about the potential for abuse of general Plan text, staff notes that, while there may have been disagreements in the past about the extent to which this text should be applied, staff pursuit of habitat-based additions to stream valley EQC areas (i.e., establishing expectations that EQC delineations would include at least some habitat-based additions to the stream valley core) has occurred infrequently and perhaps less often than might be anticipated given existing policy language that indicates that the stream valley core of the EQC system should be augmented through the addition of upland habitats that are not represented within stream valleys. The infrequency of application of this text does not, though, suggest that the circumstances under which this language could be applied should not be identified, and, with the possible exception of the language that had been suggested to address aquatic and wetland habitats (which, as noted below in the response to Issue B.2, is perhaps presented more broadly than needed), staff feels that the proposed additions are all consistent with the intent of the existing language.*

*With respect to interior forest areas, it is staff's view that this is an important clarification of the policy and serves to recognize, explicitly, a factor that staff has already been considering in its reviews. Again, the number of circumstances where interior forest areas have been a consideration during the zoning process has been limited, and the proposed text will not change this. Staff does not feel that quantitative guidance to further define the circumstances under which interior forest habitats could be present would be appropriate, as, as Mr. Rolband has noted, this will vary by species. Staff feels that the general concept is an important one to identify, recognizing that its application may vary from site to site. Staff also wishes to again stress that this is not a new concept and that it is not anticipated that it will be applied more frequently simply because it is now being identified explicitly as a consideration. Zoning applications are rarely proposed in areas where interior forest habitats are present, and staff does not anticipate that this will change.*

*In regard to vegetative communities, see the response to Issue B.3 below.*

*Staff wishes to stress that, if due diligence in researching the extent of constrained areas of a particular property is of concern, any interested party can consult with county staff outside of the development process to proactively assess the potential for habitat-based*

*additions to the stream valley core EQC areas. We encourage developers to consult with us regarding EQC boundaries prior to submitting development plans and are available to assist prospective property buyers with the identification of potential development constraints on the properties in question.*

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**ISSUE B.2: REFERENCE TO “AQUATIC AND WETLAND HABITATS”**

**Mike Rolband:** The proposed text would add “aquatic and wetland habitats that are connected to other EQC areas.” Almost all streams and wetlands are connected hydrologically. This is too broad. It would be better to tie into the state wetland permitting review process and not to add this language to the habitat component of the EQC system.

Proposed change: See below.

*Staff response: As noted above, the intent of the proposed text in this section is to clarify, rather than expand, the EQC system; it is not our intent that the frequency of expectations of expansions of the EQC system would increase. As such, staff agrees that the text regarding “aquatic and wetland habitats” is too broad. That being said, there may be circumstances where certain aquatic/wetland habitats, such as vernal pools or seeps in upland areas that are connected to and in close proximity to EQCs, would be appropriate for consideration as additions to the EQC system—the connectivity is important in order to ensure that habitats supporting the full life cycles of the species that depend upon these upland aquatic/wetland features would be available to them. Staff is not aware of any zoning cases where such areas have been identified, but staff nonetheless feels that the consideration of such areas for inclusion in EQCs would be consistent with, and anticipated by, the current Plan text; we do not view this as an expansion of existing policy. However, staff does appreciate Mr. Rolband’s perspective and therefore recommends a substantial refinement of the proposed text such that it will not be interpreted as an expansion of existing policy. In response to Mr. Rolband’s concern, staff feels that this text should be revised as follows (proposed changes in bold type):*

Policy a: ~~For ecological resource conservation, i~~Identify, protect and restore an Environmental Quality Corridor system (EQC). (See Figure 4.) Lands may be included within the EQC system if they can achieve any of the following purposes:

- Habitat Quality: The land has a desirable or scarce habitat type, or one could be readily restored, or the land hosts a species of special interest. This may include: habitat for species that have been identified by state or federal agencies as being rare, threatened or endangered; rare vegetative communities; unfragmented vegetated areas that are large enough to support interior forest dwelling species; and aquatic and wetland **breeding** habitats (i.e., **seeps, vernal pools**) that are connected to **and in close proximity to** other EQC areas.

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**ISSUE B.3: DEFINITION OF “RARE VEGETATIVE COMMUNITIES”**

**Mike Rolband:**

The proposed “habitat” language would include a reference to “rare vegetative communities.” This should be better defined; a reference to rare communities as recommended by the Virginia Department of Conservation and Recreation is suggested.

Proposed change (in bold type):

Habitat Quality: The land has a ~~desirable or scarce~~ habitat ~~type~~; or one could be readily restored, ~~or the land hosts a species of special interest. This may include:~~ **habitat** for species that have been identified by state or federal agencies as being rare, threatened or endangered; **or rare vegetative communities as defined by the Virginia Department of Conservation and Recreation. ; unfragmented vegetated areas that are large enough to support interior forest dwelling species; and aquatic and wetland habitats that are connected to other EQC areas.**

*Staff response: Staff is concerned that the proposed reference to DCR would restrict the county’s ability to recommend preservation of vegetated communities that are not recognized as rare by the state but that may be rare locally. An example of this would be meadow habitat that may not be rare state-wide but that is rare in Fairfax County. The county is currently pursuing a vegetative cover mapping effort that can be used to identify such communities. Staff therefore opposes the proposed change. Staff does not feel that the lack of a precise reference is necessary; staff notes that the existing text referencing “a desirable or scarce habitat type” does not reference any particular information sources, and staff does not feel that this text has been misused. If, however, it is determined that more precise references are necessary, staff would recommend referencing rare communities recognized by state or federal agencies as well as rare communities that are identified specifically in a publicly-available county document.*

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**ISSUE B.4: COORDINATION WITH STATE AGENCIES AS A MEANS OF ADDRESSING HABITAT CONSIDERATIONS**

Mike Rolband: Mr. Rolband has suggested that the addition of a policy regarding coordination with state agencies (see below, under “Wetlands Permitting”) would address the habitat issue.

*Staff response: Staff views these as two very distinct issues, in that “desirable or scarce habitat types” are not limited to wetlands or other water resources.*

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## **TOPIC C: INVASIVES**

### **ISSUE C.1: POTENTIAL FOR CONFLICT BETWEEN REMOVAL OF INVASIVES AND COUNTY ORDINANCES**

**Mike Rolband:** The concept of recognizing the removal of invasives should be supported, but we ought to be more flexible in the Plan and not subject the removal of invasives to a limitation based on county ordinances. The Chesapeake Bay Preservation Ordinance has been an impediment to the removal of invasives due to the limited list of species identified in the State’s regulations. The Plan should be more general so as to not restrict the removal of invasive plants because of a need to wait for an ordinance to be updated.

Proposed change (in bold type):

The following efforts within EQCs support the EQC policy and should be encouraged: . . .

- Removal of non-native invasive species of vegetation from EQCs **to the extent that such efforts would not be in conflict with county ordinances;** such efforts should be pursued in a manner that is least disruptive to the EQCs.

**Ann Csonka:** Rather than referencing the potential for conflict with county ordinances, examples could be referenced, as could be generic terminology relating to authoritative references.

*Staff response: Staff has proposed the caveat regarding conflict with county ordinances in recognition of the issue Mr. Rolband has raised. DPZ staff recognizes that there has been concern regarding how the Chesapeake Bay Preservation Ordinance has been applied in regard to removal of invasive species of vegetation. However, it is not the role of either DPZ staff or the Comprehensive Plan to question or potentially set up conflict with regulatory interpretations that may be made by the Department of Public Works and Environmental Services. The text regarding the need to avoid conflict with county ordinances has been proposed for this reason; it is a sort of red flag to alert staff reviewing zoning proposals to the potential for conflict. This will help ensure that development commitments that are accepted through zoning approvals will not set up conflicts with county ordinances.*

*Mr. Rolband has suggested that there be a consideration of elimination of DPWES approval requirements for removal of state-recognized invasive species. This is an issue that is outside the scope of this review; if there is a desire to consider it, a separate discussion with DPWES staff should be pursued.*

**ISSUE C.2: GENERAL**

**John DeNoyer:** The control of invasive vegetation can be very difficult, as after you remove the vegetation, the affected areas can once again be overtaken as a result of growth from seeds that remain. We'll never get rid of all invasives, but perhaps a significant reduction could be made if organizations like VDOT were to be discouraged from planting crown vetch and Russian and autumn olive in their rights-of-way. Oriental pears are also difficult to control.

*Staff response: Dr. DeNoyer's comments are appreciated. However, we do not see a need for changes to the proposed Plan text in response.*

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**TOPIC D: WETLAND PERMITTING**

**ISSUE D.1: COLLABORATION WITH STATE AND FEDERAL PERMITTING AGENCIES**

**Mike Rolband:** Fairfax County should follow Loudoun County's lead and establish a process for collaborating with the Virginia Department of Conservation and Recreation and Virginia Department of Environmental Quality on the reviews of zoning applications as they relate to wetlands and other water resources. Text should be added to the Plan to support such collaboration.

Proposed change (in bold type):

**Policy a: The County will develop a partnership with the U.S. Army Corps of Engineers (COE) and the Virginia Department of Environmental Quality (DEQ) regional offices responsible for implementing Federal and State regulations protecting jurisdictional wetlands and waters and take action to improve how the plan review process incorporates identification of such areas and assures that permits are obtained for proposed impacts.**

*Staff response: The concept of involving DCR and DEQ in these reviews is one that should be explored, although staff cannot assume at this time either that state resources will be available for these reviews or that a state agency review process can necessarily be established within the review time frame of zoning applications. Staff does, however, feel that discussions with the state agencies would be appropriate and would like to pursue such discussions. Regardless of the outcome of such discussions, though, staff does not support the addition of programmatic language into the Policy Plan. The Plan should instead continue to focus on land use policies rather than programmatic actions.*

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## **ISSUE D.2: WETLAND INFORMATION ON DEVELOPMENT PLANS**

**Mike Rolband:** The county should strengthen its requirements regarding the delineation of wetlands and other water resources on development plans and regarding state/federal wetland approvals prior to grading plan approval. Currently, the requirement is a check-off on plan cover sheets saying “no wetland permits” or “no wetlands.” The county has approved plans with significant impacts to these resources. While it is not the county’s role to regulate the wetlands permitting process, collaboration with the permitting agencies would help improve compliance.

Proposed change: See above.

*Staff response: This issue extends beyond the scope of this policy review; if it is to be considered further, we recommend that it be done so outside of the context of this review.*

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## **TOPIC E: ACCESS**

### **ISSUE E.1: NEED TO ACCOMMODATE APPROPRIATE LEVELS OF ACCESS**

**Mike Rolband:** The proposed text recognizing the need to provide for access roads through EQCs should be augmented to recognize the need to consider the types and levels of access needed for the uses that will be approved.

Proposed change (in bold type):

Modifications to the boundaries so delineated may be appropriate if the area designated does not benefit any of the EQC purposes habitat quality, connectedness, or pollution reduction as described above. In addition, some disturbances intrusions that serve a public purpose such as unavoidable public infrastructure easements and rights of way are may be appropriate. Disturbances for access roads should not be supported unless there are no viable alternatives to providing access to a buildable portion of a site or adjacent parcel suitable to the type and level of access needed for the type and size of use allowed. The above disturbances ~~Such intrusions~~ should be minimized and occur perpendicular to the corridor's alignment, if practical, and disturbed areas should be restored to the extent possible.

*Staff response: Staff does not feel that the additional text is needed or appropriate. The addition of a reference to “the type and size of use allowed” could be subject to differing interpretations. Would it, for example, suggest that it would be acceptable to provide for a broad swath of clearing through an EQC to support security measures that may be needed for a high security facility when a less sensitive use on the same site would not require the same level of disturbance? In staff’s view, consideration should be given to the minimum necessary disturbance that would be needed to support a viable use at a*

*density or intensity that would be consistent with Plan recommendations and that greater levels of disturbance for a particular use on the parcel should not be accepted as a given. Where broader swaths of clearing are proposed, they should be justified based on the more rigorous criteria that are being suggested for “other” disturbances.*

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## **TOPIC F: RESTORATION OF DISTURBED AREAS**

### **ISSUE F.1: “EXTENT POSSIBLE” LANGUAGE**

**Jim Hart/Frank de la Fe:** On page 18, should the language recommending restoration of disturbed areas (for unavoidable disturbances) say “. . . should be restored to the greatest extent possible?”

*Staff Response: Staff doesn’t see a difference but will defer to the committee.*

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### **ISSUE F.2: GENERAL**

**Ann Csonka:** Support for inclusion of restoration efforts.

*Staff Response: Staff thanks Ms. Csonka for her comments and her perspective.*

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## **TOPIC G: QUANTITATIVE VS. QUALITATIVE APPROACHES; FLEXIBILITY**

### **ISSUE G.1: BENCHMARKS**

**Tim Sargeant:** Should there be some sort of benchmarks established in the policy regarding disturbances?

*Staff response: Staff does not feel that this would be appropriate given the site by site variability that will occur. We anticipate that circumstances will vary greatly from one proposal to another and that a benchmark that may make sense in one case would be inappropriate to apply in another.*

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**ISSUE G.2: NEED FOR FLEXIBILITY**

**Mike Rolband:** Need to keep the flexibility to deal with these unusual and “vastly unique” circumstances.

*Staff response: Staff agrees.*

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**ISSUE G.3: GENERAL**

**Ann Csonka:** General support for movement towards quantitative measures.

*Staff response: While staff’s proposed approach would certainly not preclude the consideration of quantitative measures when evaluating proposed disturbances to EQCs, staff does not support an approach that would rely solely, or even primarily, on quantitative measures to evaluate proposals for EQC disturbances. Staff feels that a more subjective case-by-case approach would be more appropriate.*

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**TOPIC H: EQC PURPOSES—GENERAL**

**ISSUE H.1: PROPOSED DELETION OF NOISE AND AESTHETICS AS DETERMINATIVE EQC PURPOSES**

**Ann Csonka:** The five recommended functions and values are good as determinative factors. However, it’s important to retain the concepts of noise and aesthetics in some way. This would be helpful in enhancing peoples’ awareness of values of natural areas.

*Staff response: The deletion of noise and aesthetics from the EQC purposes would have the effect of removing these factors as being determinative in the designation and delineation of EQCs. These factors could, however, still be considered in the evaluation of proposals to disturb EQCs. Staff feels that this is appropriate and does not recommend that noise and aesthetic factors be considered to be determinative.*

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**TOPIC I: RESOURCE PROTECTION AREA MAPPING**

**ISSUE I.1: UPDATING GIS LAYER AS STUDIES ARE APPROVED**

**Mike Rolband:** The RPA layer in the County’s GIS should be updated as RPA delineation studies are approved to reflect the approved RPA boundaries.

*Staff response: This issue extends beyond the scope of this policy review; if it is to be considered further, we recommend that it be done so outside of the context of this review.*

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## **GENERAL COMMENTS**

**Stella Koch:** There is a need for a “big statement” regarding streams and stream valleys, and that’s not evident. All the conversations should be centered around healthy streams and stream valleys.

*Staff response: The EQC policy focuses on resources that are worthy of protection due to their environmental sensitivity. While stream valley areas constitute the core of the EQC system, and while almost all EQC designations and delineations have focused on the stream valley core of the EQC system, the EQC system is not limited to stream valley areas. As noted in the lengthy discussion above, high quality habitat areas outside of stream valleys can also be included. Therefore, staff would not support the addition of a statement that might suggest such a limitation. Staff also notes that there is a separate Policy Plan objective that focuses more specifically on stream protection and that there are many policies that follow this broad objective that support stream protection. The objective in question (Objective 2) reads as follows:*

*“Prevent and reduce pollution of surface and groundwater resources. Protect and restore the ecological integrity of streams in Fairfax County.”*

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**Eleanor Anderson:** Most citizens will simply be turned off by 33 pages of discussion that is too detailed and esoteric for non-specialists to understand. There should be a very simple, clearly stated summary that could guide the general reader through the proposed policy so that he or she can readily understand what is being proposed. The summary could first make a simple very general statement of what the current policy is; then what the problems are with it (again very general in nature); then how the policy needs to change to address the problem/problems; and then a statement of each major proposed change (again simply stated), with a reference after each such statement to the page numbers containing the language addressing each such change. With this guide, the "general public" reader could gain a great deal more command of the subject matter and perhaps be in a better position to provide feedback.

*Staff response: Staff’s intent in preparing the background document was to provide interested stakeholders with a comprehensive overview of the EQC disturbances issue and to provide a clear rationale for the overall strategy being suggested as well as for each of the individual changes being suggested. Staff understands that the details may be esoteric to some, but they are nonetheless important. That being said, staff does agree, in hindsight, that an executive summary such as that being suggested by Ms. Anderson would have been helpful. We anticipate providing a more condensed approach in the staff report that will be prepared (perhaps the discussion from the Strawman document, or a modified update, could be presented as an appendix) and hope that that document will not be as burdensome for the stakeholder who is interested in summary information.*

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**Ann Csonka:** It's essential to broaden the scope and clarify the EQC policy, so this is a good effort.

**Ann Csonka:** There is a need for more education about all the environmental factors that have been recognized in this effort. Our culture doesn't educate people enough about the values of environmental protection.

**Kris Unger:** Support for the proposal.

*Staff response: Staff appreciates these comments and the perspectives of each speaker.*