

22 February 2019

Lawrence/Douglas County Planning Commission
c/o Jeff Crick
6 East Sixth Street
Lawrence KS 66044



Dear Commission members;

The Jayhawk Audubon Society is the chapter of the National Audubon Society that serves Lawrence, Douglas County, and surrounding communities in eastern Kansas. Our mission is to provide opportunities for greater understanding and appreciation of birds and other wildlife, to encourage sustainable practices, and to advocate for actions and policies which result in protection and preservation of intact ecosystems. We have been reviewing the August 2018 draft of Plan 2040: A Comprehensive Plan for Unincorporated Douglas County and the City of Lawrence and would like to provide the comments below. We anticipate providing additional comments in the future as we continue our review.

Comments pertaining to specific parts of the Plan:

- 1) **Introduction: "Our Community Vision"**. Insert "We recognize that the natural environment is important to our wellbeing as individuals and as a community. We celebrate our natural and cultural heritage by protecting our remaining remnants of native prairie and woodlands, and endeavoring to restore native plants to the built environment" right before the sentence starting "Our citizens value preserving..."
- 2) **Chapter 2A – Growth and Development: Growth Management**. Goal 2 Item 2.2. We support retaining the Community Benefit provision as a mechanism for preserving Sensitive Lands, with special consideration given to the few remaining tracts of high-quality native prairie. We support using the Community Benefit mechanism to encourage inclusion of public green space in new residential developments.

Providing housing in and of itself does not meet the definition of a Community Benefit since its main objective is to provide benefits to the developer, not the community. Ordinances and policies establishing baseline community benefits should be established to ensure that the community shares in the benefits of development projects that encroach upon the rural character of the County.

- 3) **Relevant chapters throughout the Plan including Growth and Development, Transportation, Natural Resources, and Community Resources**. The Plan should provide guidance on mitigating the loss of native ecosystems through policies that encourage the use of native plants in new developments, in city and county-owned parks, along trails such as the Lawrence Loop, along roadways, and in landscaped areas around City and County buildings. Relevant policies and codes should dictate that native plants always be given first consideration. Native plants are heat and drought-tolerant, and have deep roots that improve water infiltration thereby reducing storm water runoff, and are hosts to our native pollinators. Landscaping with native plants provides visual separation between the built and natural environments.

Examples of sections where such language can be inserted:

Chapter 2B – Growth and Development: Residential. Goal 7. Add new item 7.11. 'Mitigate the loss of native ecosystems through policies that encourage the use of native plants in new residential developments.'

Chapter 2B – Growth and Development: Commercial. Goal 3. Add new item 3.10. 'Mitigate the loss of native ecosystems through policies that encourage the use of native plants in new commercial developments.'

Chapter 2B – Growth and Development: Industrial. Goal 4. Add new item 4.4. 'Mitigate the loss of native ecosystems through policies that encourage the use of native plants in new industrial developments.'

- 4) **Chapter 6 – Natural Resources.** Goal 2. Add new item 2.10. 'Establish a Douglas County Open Space program to protect sensitive lands and provide public lands for recreation.'

We urge the County to move forward on establishing a program to protect Sensitive Lands and provide public access for recreation throughout the County, both inside and outside the urban growth area. Parks and open space boost land values and property taxes, attract a skilled workforce and retirees, preserve ecosystem services such as carbon sequestration and reducing storm water runoff, and reduce health costs by promoting an active lifestyle.

An Open Space program should protect watersheds by protecting land prone to flooding and creating buffers along stream corridors. An Open Space program should provide options to private landowners who want to protect their land. An Open Space program should include a mechanism to generate voluntary conservation easements on private land, with priority given to high-quality native prairies and woodlands.

- 5) **Chapter 6 – Natural Resources.** Goal 2. Items 2.2 and 2.4. Combine into a single item that reads '**Preserve all sensitive lands through the development of regulations and incentives.**'

Develop rules and regulations for the protection of Sensitive Lands, and provide links to those in the Plan. One of the major criticisms of Plan 2040 is that it lacks the specificity of Horizon 2020. We recognize Plan 2040 as a 'vision' document but citizens need to see how the vision will be implemented. Many parts of the Plan refer to Specific Land Use Plans but there is no such plan that specifically guides implementation of the natural resource chapter. We support creating a comprehensive Natural Environment Management Plan.

- 6) **Chapter 6 – Natural Resources.** Sidebar. Redefine Sensitive Lands following recommendations by the Kansas Biological Survey (slightly modified):

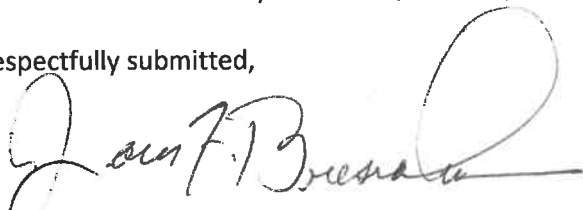
Sensitive Lands are places that have unique environmental attributes worthy of retention or special care. They are critical to the maintenance of ecosystem services and healthy plant and wildlife populations. Protection of Sensitive Lands reduces vulnerability to natural hazards, and enhances the quality of places where people live, work, and play. These lands would be identified in consultation with the appropriate advisory boards and would include:

- Floodways and floodplains
- High quality agricultural soils
- Steep slopes
- Wetlands
- Stream corridors
- Habitats for rare plants and animals
- Native prairies
- Urban forests and rural, high-quality, native woodlands

General comments:

- Create a Natural Resources Advisory Council as an official board.
- Include the Kansas Biological Survey as an advisory board for Chapter 6, Natural Resources, and Chapter 7, Community Resources, B. Parks, Recreation and Open Space.

Respectfully submitted,



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