

Comments on Draft El Dorado County Oak Woodland Management Plan 9/12/07
From Gene Thorne

1. Figure S-1 is very difficult to read because of color choices and the large amount of information contained. Colors tend to blend together.
2. Farming and ranching operations have historically not intended to save oak woodlands in their operations.
3. Objective 4, p. 4 is unclear.
4. Discussions of values of ecosystem functions are meaningless in terms of their cash value when compared with the cost of acquiring the land.
5. Unclear as to plantings not fulfilling more than one-half of the mitigation requirements. Is this for both Option A and B?
6. Much of the Plan seems to be directed into redesigning all projects. While it is understood projects should be designed to minimize disruption of oak habitat, the whole idea of the mitigation is to *mitigate* for those trees that cannot be saved and still have a viable project.
7. The thresholds of significance don't seem to reflect the General Plan designations for developable areas. The Plan seems to revisit the whole idea of the General Plan with the unwritten conclusion no trees are to be removed in developable areas and mitigation is just a buzzword.
8. What are the certain projects that will be exempt from impact significance thresholds and mitigation? (p.23)
9. Little credence is given to the cost to the County of lost tax revenue for County owned mitigation sites. Although lost revenue is acknowledged it would seem that more importance should be placed on maintaining conservation easements and still having private ownership. This would push the costs to the lower end of the scale.
10. It is also an unwritten underlying fact that grants and other public monies should be sought after, thus giving way to the conclusion that we may be developing a large money sink. The idea of looking for existing, healthy woodlands that have generally maintained themselves naturally should be more strongly endorsed.
11. The monitoring and reporting section can certainly be reduced in cost if item 10 above is considered during the acquisition process.
12. The items on the list on p.35, especially the final bullet, are punitive in nature, especially when the developer pays to the County the fee. How can the developer's project be subject to revocation if he has paid the fee and some other party or entity is maintaining or not maintaining it?

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September 10, 2007

Gregory L. Fuz, Director
El Dorado County Development Services
2850 Fairlane Court
Placerville, CA 95667

Dear Mr. Fuz,

Thank you for the opportunity to provide comments on the Draft Oak Woodlands Management Plan for El Dorado County. The beauty of our oak woodlands and the rural nature of this region are no doubt the primary reason people choose to live and work in El Dorado County.

I have thoroughly reviewed the Draft OWMP and have one comment to make in regard to Figure S-1 and pages 59 and 60 of the Draft OWMP. Oak Woodland Corridors are vital to the sustainability and viability of oak populations. Policy 7.4.2.2 of the 2004 General Plan states, "Protect critical wildlife areas and migration corridors from degradation by retaining non-disturbed natural areas through clustered development or density transfers; determine setback for corridors during environmental analysis..." In addition, policy 7.4.4.5 states, "Retain a corridor of oak trees that maintain continuity between all portions of the stand with a density equal to that of the stand."

General Plan Measures and Policies related to the OWMP clearly state that connectivity and corridors of oak woodland habitat are retained. I do not see solid evidence or relevant language that serves to implement these policies. Figure S-1 footnote 2 states that "programs *could be developed* to assist property owners in habitat protection that would enhance oak woodland values, using state, local, and federal grant funding." (Emphasis added). Although this statement poses a possible tool for protecting oak woodland corridors, it does not adequately address the policies listed above relating to retaining oak woodland corridors. Language relating to the development of conservation programs such as acquisition of conservation easements in oak woodland corridors within the OWMP would adequately address the policies stated in the 2004 General Plan.

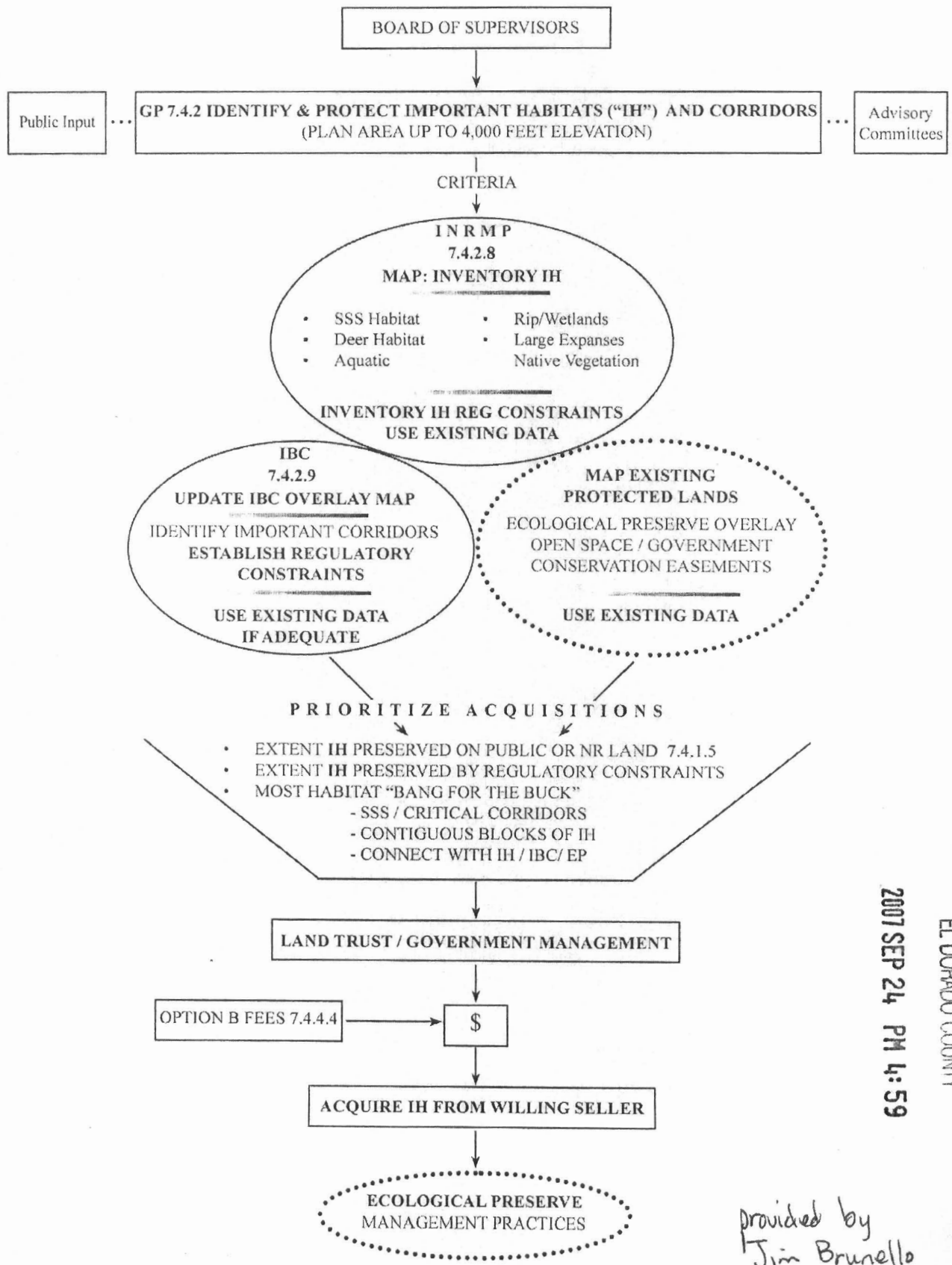
Sincerely,

Elena DeLacy
Conservation Project Coordinator
American River Conservancy

348 HIGHWAY 49 • P.O. BOX 562 • COLOMA, CA 95613
PH. (530) 621-1224 • FAX (530) 621-4818 • www.arconservancy.org

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