

MEMORANDUM

To: Shawna Purvines, Principal Planner, El Dorado County
From: Cathy Spence-Wells, Principal
Subject: Biological Resources Policy Update Decision Points 4 through 7
Date: February 17, 2015
Attachment(s): Figures 1-2

1.0 INTRODUCTION

At the Board of Supervisors hearing on January 13, 2015, the approach, timeline, and 10 Decision Points for the Biological Resources Policy Update project were presented to the Board for approval. The Board generally agreed with the steps and timeline proposed to update the General Plan biological resources policies. During the January 13, 2015 hearing, Decision Point 1 was presented to the Board and direction was given to prepare an AB 1600 Fee Nexus Study and revise the in-lieu fee with updated methodology, assumptions, and property values. During the January 26, 2015 hearing, Decision Points 2 and 3 were presented to the Board and direction was given to use oak woodland as the method for determining oak woodland impacts and necessary mitigation (Decision Point 2) and to revise the General Plan policy language to require wildlife movement studies to evaluate project-specific impacts on public safety and wildlife for projects that include new roads of 4 or more lanes or the widening of roads to 4 or more lanes (Decision Point 3). This memo provides a detailed analysis of Decision Points 4 through 7 to facilitate the Board's discussion.

2.0 DECISION POINT 4: OAK MITIGATION APPROACH

Determine if a two-tiered oak mitigation approach, where smaller projects mitigate for oak tree impacts and larger projects mitigate for oak woodland impacts, is necessary, and if so, determine the appropriate threshold.

Options: Options for this decision include establishing a two-tiered approach for oak mitigation that clearly defines which projects are subject to *oak tree* mitigation and which are subject to *oak woodland* mitigation or leaving the existing policy language unchanged. Leaving the policy language unchanged would mean that some individual projects potentially would require both oak woodland and oak tree mitigation.

Analysis: The intent of this Decision Point is to consider a two-tiered framework that would clearly identify project mitigation requirements for impacts to oak woodlands versus mitigation requirements for impacts to oak trees. General Plan Policies 7.4.4.4 and 7.4.4.5 identify oak woodland retention and mitigation requirements, while General Plan Policies 7.4.5.1 and 7.4.5.2 address oak tree removal permitting and mitigation requirements for discretionary projects. The current General Plan policies imply a 2-tiered approach to address impacts to oak woodlands and oak trees separately, however the language does not effectively separate these two approaches. Specifically, for some projects and actions, the current policy language does not preclude one project from needing to mitigate under both Policy 7.4.4.4 (oak woodlands) and Policies 7.4.5.1 and 7.4.5.2 (oak trees). The two-tiered framework presented in this memo is intended to provide a clear path for project applicants and landowners, would remove the potential need to mitigate under multiple policies, and would retain consistency with General Plan objectives.

The following sections provide detail about important policy components that were evaluated for this Decision Point.

- **Existing Policy Language:** As noted, current policy language does not preclude one project from needing to mitigate for oak woodland impacts under Policy 7.4.4.4 and for individual oak tree impacts under Policies 7.4.5.1 and 7.4.5.2, even if the impacted trees are a component of onsite oak woodlands. The updated framework could include language or provisions that prevent the need to mitigate impacts to woodland trees if oak woodland mitigation is already being required.
- **Projects and Actions Not Subject to Policy Requirements:** A review of mitigation/permit exemptions for oak trees and oak woodlands is presented in Decision Point 5. These exemptions are not consistent. Specifically, Policy 7.4.4.4 currently requires mitigation for projects that result in soil disturbance on parcels that 1) are over an acre and have at least 1 percent total canopy cover or 2) are less than an acre and have at least 10 percent canopy cover by woodland habitats. Policy 7.4.5.2 provides tree removal permit exemptions for removal of trees less than 36 inches in trunk diameter on 1) lands in Williamson Act Contracts, Farmland Security Zone Programs, Timber Production Zones, Agricultural Districts, designated Agricultural Land (AL), and actions pursuant to a Fire Safe plan; 2) all single family residential lots of one acre or less that cannot be further subdivided; 3) when a native oak tree is cut down on the owner's property for the owner's personal use; and 4) when written approval has been received from the County Planning Department.
- **Potential Threshold for 2-Tiered Approach:** As noted, several exemptions exist that limit the applicability of these policies, but interpretation can cause confusion when evaluating proposed projects or actions. One consistency between the policies is a 1-acre

threshold, with clarifications, for exempting certain projects/actions. A policy language modification for the Board to consider is to exempt oak woodland impact analysis/mitigation on parcels that are 1 acre and less in size and that cannot be further subdivided. This would be consistent with the intent of the language in Policy 7.4.5.2 for individual trees. Applying this 1 acre threshold to all oak woodland and oak tree polcieis would ensure policies are implemented consistently and would clarify mitigation requirements.

To better understand the effect of this potential policy language modification, an analysis of County parcel data and oak woodland distribution data was conducted. The analysis uses geographic information systems (GIS) tools, County assessor parcel data, and oak woodland distribution data available from CAL FIRE’s Fire and Resource Assessment Program (FRAP 2006) to evaluate the quantities of parcels that may be affected by a 1 acre threshold for the potential 2-tiered approach.

Table 1
Summary of Parcel Sizes with Oak Woodlands in El Dorado County

Parcel Size	Total in County*	Quantity with Oak Woodlands (% of Total)	Quantity with Oak Woodlands and Not Classified as Developed (% of Total)
<= 1 acre	50,999	8,550 (9.7%)	1,938 (2.2%)
> 1 and <= 2 acres	6,806	4,363 (4.9%)	771 (0.9%)
> 2 and <= 5 acres	10,318	7,919 (8.9%)	1,523 (1.7%)
> 5 and <= 10 acres	8,798	7,488 (8.5%)	1,685 (1.9%)
> 10 and <= 40 acres	7,267	5,990 (6.8%)	2,327 (2.6%)
> 40 acres	3,970	2,437 (2.8%)	1,962 (2.2%)
Total:	88,158	36,747 (41.7%)	10,206 (11.6%)

*Excludes parcels within the Cities of Placerville and South Lake Tahoe

As shown in Table 1, a total of 50,999 parcels in the County are less than or equal to 1 acre, excluding those in the Cities of Placerville and South Lake Tahoe. Of that total, 8,550 parcels have some level of oak woodland coverage, based on the extent of the FRAP oak woodland distribution data. Of the parcels that are equal to or less than 1 acre with some level of oak woodland coverage, 1,938 are not classified as developed by the County Assessor. Modification of policy language to exempt parcels less than or equal to 1 acre from oak woodland impact evaluation/mitigation could affect between 1,938 and 8,550 parcels in the County (2.2% to 9.7% of all 1 acre and smaller parcels in the County).

- **Oak Woodland Retention Standards:** General Plan Policy 7.4.4.4 currently requires oak canopy retention. The current oak canopy retention standards are presented in Table 2 below.

Table 2
Current Oak Canopy Retention Standards (Policy 7.4.4.4)

Percent Existing Canopy Cover	Canopy Cover to be Retained
80 – 100	60% of existing canopy
60 – 79	70% of existing canopy
40 – 59	80% of existing canopy
20 – 39	85% of existing canopy
10 – 19	90% of existing canopy
1 – 9 for parcels >1 acre	90% of existing canopy

Source: El Dorado County General Plan Policy 7.4.4.4

Given the Board direction on January 26, 2015 to use oak woodland as the unit of measurement, the retention requirements identified above in Table 2 could simply be updated to reflect oak woodlands. However, the current retention requirements do not actually require retention if an in-lieu fee option is used and the current requirements can be confusing to interpret and implement at a project level, according to feedback provided by County staff.

A modification to this policy that is recommended for the Board to consider is to incentivize woodland retention rather than require it. This modification could be implemented by eliminating the current retention requirement table and replacing it with a variable mitigation ratio approach. An example of this mitigation ratio is presented in Table 3.

Table 3
Sample Oak Woodland Mitigation Ratios

Percent of Oak Woodland Impact	Oak Woodland Mitigation Ratio
0-50%	1:1
50.1-75%	1.5:1
75.1-100%	2:1

Using the incentive-based retention approach, projects that impact a greater percentage of onsite oak woodland area would need to provide more relative mitigation than those that impact a smaller percentage of onsite oak woodland area. For example, a project that impacted 40% of the woodland on the project site (and retained 60% of it onsite) would

be required to mitigate at a 1:1 ratio; a project that impacted 60% of the woodland onsite (and retained 40%) would be required to mitigate at a 1.5:1 ratio; and a project that impacted 80% of the woodland (retaining 20%) would be required to mitigate at a 2:1 ratio. It is expected that this approach would simplify the oak woodland impact analysis process, relative to the existing retention policy, and would retain consistency with the current policy approach. Oak woodland mitigation options could then be determined on a project-level to meet the necessary mitigation ratio.

- ***Heritage Trees:*** Current policy language (Policy 7.4.5.2) requires a tree removal permit for trees with a trunk diameter of at least 6 inches (or 10-inch aggregate for multi-stem trees) and provides exemptions if trees measure less than 36 inches in trunk diameter. While not specifically defined, the identified 36-inch threshold under existing policies affords greater protection to large trees. However, while General Plan Objective 7.4.5 is to “protect and maintain native trees including oaks and landmark and heritage trees,” the definitions of ‘heritage tree’ and ‘landmark tree’ in the 2004 General Plan are vague and do not provide any type of measurement criteria to easily determine a tree’s status. Based on the current policy language, heritage or landmark tree protection is difficult to evaluate. A policy modification for the Board to consider is to specifically define heritage trees as native oak trees with individual trunk diameters measuring 36 inches or more.
- ***Two-Tiered Oak Tree and Oak Woodland Framework:*** As noted, the current policies related to oak woodland and oak tree protection and mitigation contain vague language and can be difficult to implement. In an effort to clarify the process by which oak tree and oak woodland impacts are determined and mitigated, a two-tiered approach has been identified that incorporates existing General Plan requirements and the policy modifications identified above. The following summarizes the two-tiered approach, while Figure 1 presents a conceptual oak resource process flow chart that graphically outlines this approach.
 - ***Oak Woodlands:*** Impacts to oak woodlands that do not meet qualified exemptions would be mitigated. Oak woodland mitigation requirements and options would be outlined in the OWMP. Mitigation options would include on- or offsite tree planting, on- or offsite conservation, and in-lieu fee payment. Mitigation ratios would be based on the percent of oak woodland impacted and would be applicable across all mitigation options (i.e., the mitigation ratio would remain constant regardless of the mitigation approach selected).
 - ***Oak Trees:*** Mitigation for impacts to individual heritage trees would be required regardless of parcel size, project type or action, or location within or outside of an oak woodland. Impacts to individual oak trees measuring between 6 and 36 inches

trunk diameter that do not meet qualified exemptions would be mitigated, unless already being mitigated as a component of oak woodland mitigation requirements. Oak tree mitigation requirements would be outlined in the OWMP. Mitigation options would include onsite or offsite tree planting and in-lieu fee payment. Mitigation requirements would be based on an inch-for-inch replacement scale.

- ***Qualified Exemptions:*** Exemptions would be consistent for projects impacting oak woodlands or individual oak trees; however, no exemptions would apply for impacts to heritage trees. Exemptions are discussed in greater detail in Decision Point 5.
- ***Comparison with Other Rural Counties:*** In order to provide context for this Decision Point, an analysis of tree and woodland policies in neighboring rural or foothill counties was conducted. Based on this analysis, the recommended oak woodland-related policy approach most closely aligns with Placer and Tuolumne Counties, both of which require an assessment of impacts on an oak woodland basis. These counties also include provisions for in-lieu fee payments (Placer County) and oak woodland preservation standards (Tuolumne County). The oak tree policies most closely aligned with the approach for El Dorado County include those from Nevada County (preservation of Landmark Trees (36” and larger)), Placer County (individual tree mitigation requirements), and Tuolumne County (Heritage Tree and individual oak tree mitigation requirements). A detailed summary of this policy comparison is presented in Table 4.

Table 4
Neighboring County Tree and Woodland Policy and Ordinance Summary

County	Adopted OWMP	Tree-related Policies/Regulations	Woodland-related Policies/Regulations
Alpine	No	No policies/ordinances addressing tree protection/mitigation.	No policies/ordinances addressing woodland protection/mitigation.
Amador	No	GP policies identify careful protection of natural scenic resources and environmental assets in all future major public and private development; retention of mature trees may be required for scenic purposes; planting of native trees may be required. No ordinances in place regarding tree protection.	No ordinances in place regarding woodland protection. <i>Note: Policies included in the Open Space Element of the Draft General Plan update encourage preservation of oak woodlands in accordance with Public Resources Code 21083.4, conservation of corridors for wildlife movement in oak woodlands, and provide for support voluntary conservation easements to protect oak woodlands. Implementing measures in the Open Space Element include requiring the assessment of impacts of proposed projects on oak woodlands and requiring mitigation per Public Resources</i>

Table 4
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County	Adopted OWMP	Tree-related Policies/Regulations	Woodland-related Policies/Regulations
			<i>Code section 21083.4. For discretionary development proposals, it is the County's objective to avoid or reduce impacts to oak woodlands through project design and modification.</i>
Butte	No	<p>GP policies call for establishment of mitigation bank including oak woodland, and to seek funding for an approach to protect significant specimen trees and groves.</p> <p>Improvement Standards require parcel maps and site improvement plans to show trees (4" and larger) and other foliage, including any tree that falls within the existing or proposed right of way or easement. Permission to remove any tree not required to be removed by construction in the rights of way or easements must be obtained from the county.</p> <p>Subdivision Ordinance requires that all subdivisions be designed so that existing trees be preserved according to the requirements of the department of development services.</p>	<p>GP policies call for establishment of mitigation bank including oak woodland, and to seek funding for an approach to protect significant specimen trees and groves.</p> <p>Subdivision Ordinance requires that subdivision map applications include biologic and botanical surveys of all drainage swales, creek or river frontages, riparian areas and valley oak woodland.</p>
Calaveras	No	<p>Policies address only riparian vegetation protection and avoidance.</p> <p>No ordinance addressing tree protection/mitigation.</p>	No policies/ordinances addressing woodland protection/mitigation.
Nevada	No	<p>Policies call for minimization of disturbance of heritage and landmark trees/groves and low elevation oaks; identify requirements for vegetation inventories for discretionary and ministerial projects; identify mandatory clustering of development; and call for regulation to be adopted for protection of heritage/significant trees.</p> <p>The County's tree ordinance covers Landmark Trees (36" + dbh¹) requires tree replacement (on site) or payment into the County's Tree Preservation fund.</p>	<p>Policies call for minimization of disturbance of heritage and landmark trees/groves and low elevation oaks; identify requirements for vegetation inventories for discretionary and ministerial projects; identify mandatory clustering of development; and call for regulation to be adopted for protection of heritage/significant trees.</p> <p>The County's tree ordinance covers Landmark Trees (36" + dbh¹) requires tree replacement (on site) or payment into the County's Tree Preservation fund.</p>
Placer	Yes	County has a tree preservation policy in place that outlines mitigation requirements for impacts to oak trees.	As an un-adopted, working practice, the County requires mitigation for oak woodlands on properties that have 2 acres or more of oak woodland (on an acreage basis). Identification of significant trees (> 24" dbh) within oak woodland stands is also required. Project sites

Table 4
Neighboring County Tree and Woodland Policy and Ordinance Summary

County	Adopted OWMP	Tree-related Policies/Regulations	Woodland-related Policies/Regulations
			with < 2 acres of woodland are subject to the mitigation requirements in the County's tree preservation ordinance.
Plumas	No	No specific policy related to oaks or other trees. No net loss policy for sensitive natural plant or habitat communities as defined by federal, state or local agencies. No ordinances in place regarding tree protection.	No specific policies/ordinances related to woodland protection/management.
Sierra	No	No specific policies related to oaks or other trees; prohibition on development in meadows. No ordinances in place regarding tree protection.	No specific policies/ordinances related to woodland protection.
Tehama	Yes, but voluntary	Implementing measure in the Land Use Element of the GP requires the county to work with project applicants, during the review of new discretionary development applications, to retain mature oak trees, of all sizes and species, when and where possible using creative land and site development measures. Implementing measure included in the Air Quality Element of the GP includes a provision for the county, upon tree removal, to encourage the replanting of an equal or greater number of trees. No ordinances in place regarding tree protection.	<i>Voluntary Oak Woodland Management Plan</i> adopted in 2005. The purpose of this document was to expand upon, refine, and improve voluntary oak protection guidelines that had been established by the County in 1994, and to provide a consistent policy for conservation and use of oak woodland habitats throughout the County. Related GP policies call for voluntary protection and restoration, mapping, and monitoring, while examining feasibility of Oak Woodlands Ordinance.
Tuolumne	No	GP policies identify retaining existing significant vegetation (including Heritage Trees); call for establishing a Heritage Tree Program; call for retention of trees along Scenic Routes; and call for developing voluntary tree protection guidelines. Implementing measures require Requires development of Tuolumne County Biological Conservation Handbook, to be updated at least every 5 years, and which would be used to establish appropriate mitigation for project impacts under a Biological Resources Conservation Program. Chapter 9.24 of the Tuolumne County Code discourages premature removal of native oak trees and establishes penalties, mitigation requirements and an enforcement procedure should premature removal of oak trees in anticipation of development occur.	GP policies identify retaining existing significant vegetation (including oak woodlands); "no net loss" for valley oak woodland in development areas; and minimum acreage preservation standards for oak woodlands. Implementing measures require development of Tuolumne County Biological Conservation Handbook, to be updated at least every 5 years, and which would be used to establish appropriate mitigation for project impacts under a Biological Resources Conservation Program. Chapter 9.24 of the Tuolumne County Code discourages premature removal of native oak trees or oak canopy and establishes penalties, mitigation requirements and an enforcement procedure should premature removal of oak trees in anticipation of development occur. Monetary fines may be imposed as high as three times any in-lieu fee established by the

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County	Adopted OWMP	Tree-related Policies/Regulations	Woodland-related Policies/Regulations
			<p>board of supervisors to mitigate impacts to native oaks or oak woodlands in accordance with the mitigation program established in the Biological Resources Conservation Handbook. Any monetary fines collected shall be deposited in the Tuolumne County Oak Woodland Conservation Fund.</p> <p>Tuolumne County Oak Woodland Conservation Fund was established in 2008 to collect fees to mitigate impacts to oak woodlands and net loss of old growth oaks. The money collected in the fund may only be allocated by the Board of Supervisors and the fund may be used to purchase land in fee or conservation easements for the protection of native oak woodlands or for other measures that will restore or enhance native oak woodlands, or otherwise mitigate the impacts associated with the conversion of oak woodlands or impacts to old growth oaks.</p> <p><i>Note: Tuolumne County's Biological Resources Section of the proposed Natural Resources element is proposed to be comprehensively updated with the elimination of the County's mitigation program which has been in effect since 1987 and the establishment of thresholds of significance for oak woodland conversion.</i></p>

¹ dbh = diameter at breast height, a measurement of tree trunk diameter measured at 4.5 feet (54 inches) above natural grade

Recommendation: The recommended approach is to update the General Plan policies and OWMP language to:

- Revise the minimum parcel size criteria for projects that are exempt from oak woodland mitigation.
- Update the oak woodland retention standards and mitigation ratios.
- Clarify mitigation requirements for individual native oak trees outside of oak woodlands and for heritage trees.

3.0 DECISION POINT 5: OAK RESOURCE EXEMPTIONS

Determine whether exemptions to oak resource impact mitigation requirements included in the current OWMP and General Plan biological resource policies shall remain and/or be revised.

Options: Options for this Decision Point include providing exemptions to oak resource mitigation for specific project types/actions consistent with existing OWMP and General Plan policies, revising/refining the list of project types/actions that are exempt, or eliminating exemptions.

Analysis: Given the Board direction on January 26, 2015 to use oak woodland as the unit of measurement, this Decision Point references only oak woodlands and oak trees assuming that the use of the term ‘oak canopy’ used in current General Plan language will be revised as a component of this biological resources policy update project.

Generally the exemptions for impacts to oak woodland include: agricultural activities; fire safety; affordable housing; road widening and realignments necessary to increase capacity, protect public health, and improve safe movement of people and goods in existing public rights-of-way; and public utility projects. Current County General Plan policies and the OWMP include exemptions and/or reduced retention requirements for oak resource mitigation for both oak woodlands and individual oak trees. These exemptions are found in General Plan Policy 7.4.4.4, General Plan Policy 7.4.5.2 and the OWMP and include:

- Current General Plan Policy 7.4.4.4 exemptions include:
 - Areas within an approved Fire Safe Plan.
 - Areas in active agricultural cultivation.
- Current General Plan Policy 7.4.5.2 exemptions include removal of trees with trunk diameters less than 36 inches:
 - On lands in Williamson Act Contracts, Farmland Security Zone Programs, Agricultural Districts, designated Agricultural Land, and actions pursuant to a Fire Safe Plan.
 - On all single-family residential lots of 1 acre or less that cannot be further subdivided.
 - When a native oak is cut down on the owner’s property for the owner’s personal use.
 - When written approval has been received by the County Planning Department.

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- The OWMP includes exemptions and reduced retention requirements for the following projects or improvements:
 - Affordable Housing projects qualify for reduced oak woodland retention requirements.
 - County capital improvement projects (when new alignment is dependent on existing alignment) are exempt from oak woodland retention and replacement standards.
 - Vegetation management for compliance with California Public Utilities Commission (CPUC) regulations and maintenance of safe operation of utility facilities are exempt from oak woodland retention and replacement standards.

Several of the current exemptions are linked to state regulations, including those for fire safety and the requirements for maintaining defensible space around habitable structures in state responsibility areas (Public Resources Code (PRC) 4291). Public utility exemptions are intended to apply to state-level vegetation clearance requirements for transmission lines (CPUC General Order (GO) 95). Exemptions for agricultural cultivation are also included in the state-level oak woodland regulations (Kuehl Bill) and are consistent with other County policies to support and promote agriculture. Similarly, the Kuehl Bill addresses exemptions for affordable housing; however, these apply only to urbanized areas. The current OWMP does not exempt affordable housing from mitigating impacts to oak woodlands; however, it does reduce mitigation requirements for projects that include a minimum of 10% of very low-, lower-, and moderate-income housing units. These mitigation reductions could facilitate development of affordable housing units, as described in County General Plan objectives.

Other County exemptions from oak woodland retention and replacement standards include County capital improvement projects, which are projects intended to address road widening and realignments necessary to increase capacity, protect public health, and improve safe movement of people and goods in existing public rights-of-way. However, these projects are not exempt from individual oak tree removal and mitigation requirements. As described in the OWMP Status and Key Issues Memo (County of El Dorado, 2007), “removal of oak trees necessary to complete Capital Improvement Projects which affect the health and safety of the public in existing or future public road right-of-ways, or removal of oak trees necessary to comply with the safety regulations of the Public Utilities Commission and necessary to maintain a safe operation of utility facilities, within a public road right-of-way or utility easement, is exempt from oak canopy retention and replacement standards. An example of this exemption would be the removal of oak trees for an operational and safety road improvement project. This exemption to the oak tree canopy retention and replacement standards does not apply to new proposed roads within the County Circulation Element; to any road re-alignment projects or utility projects that propose to

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remove significant oak trees within an oak woodland habitat; nor to internal circulation roads within new development.”

The remaining three exemptions are focused on individual tree impacts and exempt removal of individual trees less than 36 inches in trunk diameter. These include oak tree removal on single-family residential lots of 1 acre or less that cannot be further subdivided, oak tree removal for the property owner’s personal use, and oak tree removal conducted with written approval from the County Planning Department. No background information was found regarding these exemptions for individual oak tree removal.

Potential New Exemptions: In addition to the aforementioned existing exemptions, during its January 13, 2015 hearing, the Board suggested examining exemptions for public park, public building and public school projects from the oak resource mitigation requirements included in the General Plan. An evaluation of these potential project types was conducted and is presented below:

- ***Public Parks:*** Based on the information presented in the 2012 El Dorado County Parks and Trails Master Plan, four facilities are proposed for construction or development. Available planning data, parcel data, and oak woodland distribution data was evaluated to better understand the scale of potential impacts to oak resources resulting from these projects. A summary of each proposed facility and estimated oak resource impacts is presented below:
 - ***Railroad Park:*** Located in El Dorado, this park would encompass 6.3 acres plus and would include an expansion of an existing museum and train station and add a 2.2 mile trail connecting the park to Missouri Flat Road. The project site is located along the existing Sacramento Placerville Transportation Corridor and oak resources on site are concentrated primarily along the property boundaries. Project-related oak resource impacts are expected to be minimal, although some large oak tree removals may be necessary.
 - ***Cronan Ranch:*** Located in Pilot Hill, the County owns 62 acres of a 1,600-acre natural area which is held in public trust and to be used exclusively for recreation and wildlife conservation. The County-owned portion of the Ranch appears to contain only a small oak woodland located on a hilltop and a few scattered individual oak trees. Land easement language would limit County-directed development within its 62 acres and impacts to oak resources are expected to be minimal.
 - ***Bass Lake Regional Park:*** This park site consists of 40 acres of undeveloped land between Cameron Park and El Dorado Hills. Conceptual parks plan call for the development of a community center, ball fields, playgrounds, parking, disc golf,

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and other higher-intensity uses. The site is largely tree-less, although an oak woodland appears to be located in the site's northwest corner and scattered individual trees are located throughout the remaining park areas. Oak woodland impacts are expected to be less than 5 acres. Individual oak tree impacts may also be realized, depending on final site plan development, but are expected to be minimal.

- *Pollock Pines Community Park:* Proposed development at this 26-acre park in Pollock Pines includes ball fields, a playground, parking, restrooms, trails and an outdoor classroom amphitheater. Site planning documents identify that between 5 and 8 large oak trees (trunk diameters measuring between 28 and 52 inches) would require removal. There are a total of 11 large oak trees on the project site.
- **Public Buildings:** The timing, funding and construction of public buildings are subject to decisions outside the scope of this analysis. To provide some data that the Board could consider related to an exemption for the construction of public buildings, properties owned by the County of El Dorado that contain oak woodlands were reviewed. Based on the County's GIS parcel data, the County owns 257 parcels totaling 1,321.3 acres that contain some oak woodland. The total woodland acreage within those properties is 536.9 acres. These acreage figures do not include the park properties described above.
- **Public Schools:** Pursuant to the Public Resources and Government Code, school districts retain the authority to overrule local zoning and general plan land-use designations for schools, if specified procedures are followed. The County has little jurisdiction over construction of public schools and therefore tree removal regulation could not be enforced.

Recommendation: The recommended approach is to clarify the use of exemptions in most instances by combining similar exemptions for both oak woodlands and individual oak trees. Consistent with current standards, individual oak trees measuring or exceeding 36 inches in trunk diameter would be regulated under the Heritage Tree provisions. Under this recommendation, projects that are consistent with the exemptions in state regulations (Kuehl Bill and General Order 95) and specific County policies would be exempt from oak woodland and oak tree mitigation. Specific project types that could qualify for these exemptions include:

- Oak resource impacts in the County for maintaining defensible space in State Responsibility Areas (SRA), in accordance with Public Resources Code 4291;
- Oak resource impacts associated with agricultural cultivation/operations, whether for personal or commercial purposes, on land planned (AL, NR, RR, and Agricultural Districts [-A]) or zoned (AE, AP, A, PA, SA-10, RA, TPZ, and MR);

- Oak resource impacts associated with vegetation clearance requirements for transmission lines by public utility in compliance CPUC regulations(General Order 95); and
- Oak resource impacts for road widening and realignments necessary to increase capacity, protect public health, and improve safe movement of people and goods in existing public rights-of-way. This would not apply to new proposed roads within the County Circulation Element or to internal circulation roads within new development.
- Oak resource impacts incurred during emergency firefighting operations or when a tree exhibits high failure potential with the potential to injure persons or damage property, as documented by a certified or licensed professional.

It is also recommended that the reduction in mitigation requirements for affordable housing be maintained and applied for both oak woodland and oak tree impacts. In addition, and as discussed in Decision Point 4, it is recommended that the exemption for single-family residential lots of 1 acre or less that cannot be further subdivided be maintained and applied to both oak woodland and oak tree impacts. These recommendations are consistent with intent of this update process to provide policies that are self-implementing, do not need interpretation or clarification, and define the resources covered and types of development activities covered or, in this case, exempted.

No background information on the two remaining current exemptions for removal of individual oak trees for the property owner's personal use and with written approval from the County Planning Department was found. It is requested the Board provide direction on these exemptions. The information on the potential exemptions for public schools, parks and government buildings is also presented for the Board's consideration.

4.0 DECISION POINT 6: PRIORITY CONSERVATION AREA UPDATE (FOR OAK WOODLANDS)

Determine whether to update the Priority Conservation Areas (PCAs) related to Oak Woodlands.

Options: Options for this decision include updating the PCAs, leaving them as delineated in the 2008 OWMP, or leaving them as delineated in the 2008 OWMP and also establishing within the OWMP criteria that would be used to identify conservation lands outside of the PCAs.

Background: This decision point is focused on the PCAs as they relate to oak woodland mitigation and conservation. Another decision point will be presented to the Board in March 2015 that relates to the role of the PCAs and Important Biological Corridors (IBCs) in a conservation strategy for special-status species in the County. These decision points were separated as they naturally fit with the two other decision points related to oak resources being

presented at the February 23, 2015 Board hearing and another decision point related to special-status species to be presented at the March 30, 2015 Board hearing.

Analysis: This decision point is presented to the Board because a preliminary analysis of the 2008 OWMP, the 2004 General Plan land use designations, and oak woodland distribution in the County reveals discrepancies that may warrant further analysis. Specifically, the 2008 OWMP identifies two different area totals for the size of the identified PCAs (approximately 40,000 acres and approximately 66,000 acres) while the 2004 General Plan EIR identifies approximately 175,000 acres of oak woodlands potentially impacted as a result of the development anticipated under the General Plan by the planning horizon year of 2025

The General Plan EIR discusses a General Plan Build-Out scenario that assumes development levels at the “theoretical maximum” capacity allowed under the General Plan land use designations. Specifically, this scenario assumes that all parcels are subdivided and developed to the maximum extent allowed, regardless of topography, resources, or County policies and ordinances. This build-out scenario is a maximum development projection and reflects much more development than would occur under the projected growth rate for the County, as determined by the California Department of Finance. The General Plan EIR also evaluates the projected development under a Planning Horizon year of 2025. This scenario is based on the Department of Finance growth projections and anticipates construction of 32,491 new residences and development that would support 42,202 new jobs within the County. The analysis of the PCAs, likely development, and ability to mitigate impacts is based on this Planning Horizon scenario rather than the theoretical maximum development under the build-out scenario.

The General Plan and OWMP require mitigation for oak woodland impacts at a 1 to 1 ratio or 2 to 1 ratio dependent upon the amount of onsite retention. The identified PCAs do not contain sufficient area to accommodate full mitigation of the amount of impact assumed in the General Plan EIR. The following discussion summarizes the original PCA development process and additional analysis Dudek has conducted in support of this decision point:

- ***Initial Development of PCAs:*** The PCAs were developed during preparation of the 2008 OWMP and were intended to identify “large expanses of contiguous oak woodland habitat where conservation easements may be acquired from willing sellers to offset the effects of increased habitat loss and fragmentation elsewhere.” This approach was consistent with General Plan Policy 7.4.2.8, which identifies habitat acquisition as a component of the County’s overall habitat protection strategy, which was to be established in the County’s Integrated Natural Resources Management Plan (INRMP).

Delineation of the PCAs was conducted using geographic information systems (GIS) tools, oak woodland habitat mapping data, and County parcel data. Large expanses of oak woodland habitat (500 acres or more) were identified outside of Community Regions,

Rural Centers, and lands designated as Low Density Residential in the 2004 General Plan. The PCAs are made up of 40-acre and larger privately-owned parcels (Figure 2) and cover a total area of 40,420 acres. The PCAs include land that carries the following General Plan land use designations: Agricultural Lands (11,690 acres), Low Density Residential (2.4), Medium Density Residential (27 acres), Natural Resources (12,644 acres), Open Space (459 acres), and Rural Residential (15,598 acres).

- ***Role of PCAs in Oak Woodland Mitigation:*** Identification of the PCAs was intended to guide the County’s acquisition of oak woodland habitat as mitigation for loss of oak resources. As provided in General Plan Policy 7.4.4.4 and the OWMP, project developers would have the option of retaining oak canopy onsite or mitigating impacts offsite. Offsite mitigation could be achieved by paying into the Oak Woodland Conservation Fund or by providing for dedication of a conservation easement on lands supporting oak woodland. The OWMP anticipated that once developers paid into the Oak Woodland Conservation Fund, the County would use the accumulated funds to acquire conservation easements in the PCAs. Each developer paying into the Oak Woodland Conservation Fund would be required to pay a fee sufficient to acquire and manage a conservation easement that would provide for mitigation of the onsite oak resource impacts.

For all offsite mitigation, conservation easements must be granted to the County in perpetuity. The OWMP notes that “priority should be given to conserving oak woodland habitat within PCAs adjacent to existing woodlands under or subject to an IBC, conservation easement, public lands, open space lands, riparian corridors, ecological preserves or other PCAs lying west of the National Forest.”

Additionally, the OWMP provides that conservation easements do not have to come from areas within the PCAs as long as the mitigation location is surveyed and determined to be of equal or greater biological value as the oak woodland proposed to be removed. Under the 2008 OWMP, this determination was required to be made based on consideration of “habitat elements such as snags, large woody debris, and the diversity and structure of the understory.”

- ***Additional Analysis of PCA Needs:*** Based on the discrepancy between potential oak woodland impact acreage identified in the 2004 General Plan EIR (approximately 175,000 acres) and PCA acreage identified in the 2008 OWMP (either approximately 40,000 or 66,000 acres), further analysis was conducted to determine the extent to which the PCAs may need to be updated. It should be noted that the 175,000 acre impact identified in the General Plan EIR is based on a calculation of all oak woodlands within ‘high’ and ‘medium’ intensity land use designations (as defined in the General Plan EIR, this includes all land use designations except natural resources and open space). This

methodology for calculating impacts likely over-predicts the actual impact area. Using GIS analysis tools, the following data sets were analyzed, processed, and compared:

- 2004 General Plan Land Use Designations: Consistent with the methodology used in the 2004 General Plan EIR, all General Plan land use designations not classified as either natural resources or open space were assumed to have an effect on biological resources.
- County-wide Slope Measurement Data: Using a digital terrain data set, the County was classified into two slope categories: greater than 30% or less than or equal to 30%. This classification was completed to determine developable area in the County, consistent with General Plan Policy 7.1.2.1, which prohibits development or disturbance on slopes in excess of 30%, with some exceptions.
- Oak Woodland Distribution Data: The most current oak woodland distribution data available from CAL FIRE's Fire and Resource Assessment Program (FRAP 2006) was compared with the County-wide slope measurement data and the General Plan land use designations. The data was then analyzed and potential oak woodland impact area refined.
- PCA and IBC Data: The currently-delineated boundaries of the PCAs and IBCs were also compared with oak woodland distribution and land use designation data to identify the total amount of oak woodland habitat within the PCAs and IBCs. This information indicates the amount of woodland available for mitigation. It is noted that the PCAs contain very little land that is designated for moderate or high intensity development other than rural residential land uses, while the IBCs contain approximately 26,975 acres of land that are designated for low and medium density residential, commercial, industrial, and other moderate to high intensity land uses. While it is likely that much of the land in the PCAs would not be intensively developed, there is potential that some of the oak woodland within the IBCs could be lost to development. However, for the purposes of this analysis, it is assumed that all of the oak woodlands within the IBCs would remain available for conservation to mitigate impacts from development elsewhere in the County. At the time that development restrictions and/or standards for the IBCs are developed, additional analysis of the potential for oak woodlands within the IBCs to be available for conservation will be conducted.

By evaluating the oak woodland data set with the land use designation, slope, and PCA/IBC data sets, a comparison between projected oak woodland impacts and available oak woodland mitigation area within the PCAs and IBCs could be completed. A summary of this evaluation is presented in Table 5.

**Table 5
Oak Woodland Impact and Conservation Summary Table**

Oak Woodland Type	Total in County (acres)	High and Medium Intensity Impacts (Slopes > 30% and excluding PCAs and IBCs) (acres)	High and Medium Intensity Impacts (Slopes ≤ 30% and excluding PCAs and IBCs) (acres)	Total in Priority Conservation Areas (acres)	Total in Important Biological Corridors (acres)	Total PCA and IBC (acres)
Blue Oak Woodland	42,614	2,741	18,903	10,774	6,772	17,546
Blue Oak-Foothill Pine	12,915	983	5,870	1,557	2,643	4,200
Coastal Oak Woodland	13	0	13	0	0	0
Montane Hardwood	161,152	12,977	50,433	23,975	31,160	55,135
Montane Hardwood-Conifer	37,661	3,046	10,468	2,787	3,323	6,110
Valley Oak Woodland	3,434	55	2,133	310	809	1,119
Total:	257,789	19,801	87,820	39,403	44,707	84,110

As presented in Table 5, up to 87,820 acres of oak woodland may be impacted under the General Plan Planning Horizon development scenario. This total excludes oak woodland areas on slopes greater than 30% slope as well as high and medium intensity impact areas located within the PCAs or IBCs. Oak woodlands with slopes greater than 30% were excluded from the calculated oak woodland impact total as development of these areas is expected to be minimal. Oak woodlands within the PCAs and IBCs were also excluded from the calculated oak woodland impact total as these areas were assumed to be used for conservation purposes. However, as noted above, there is potential for some of the oak woodlands in the PCAs and IBCs to be lost to development. That would reduce the amount of oak woodland currently mapped as being available for conservation and the County and/or project developers would need to find additional lands for conservation.

Collectively, the PCAs and IBCs encompass 84,110 acres of oak woodland that may be available for conservation to mitigate impacts to oak woodlands resulting from implementation of the General Plan. This is approximately 96% of the total anticipated impacts to oak woodlands. However, the General Plan requires that impacts to oak woodland that are mitigated through offsite conservation be mitigated at a 2:1 ratio, if onsite retention goals for oak resources are not met. If no future development projects provide for any amount of onsite oak woodland retention, the County would need more than twice as much land as is currently included in the PCAs and IBCs to provide for mitigation of oak woodland impacts.

To the extent that projects retain oak woodland habitat onsite, the total anticipated impacts to oak woodlands and amount of offsite mitigation required would be reduced. Additionally, the OWMP allows for project developers to identify offsite mitigation

opportunities that are outside of the PCAs and IBCs. These factors would reduce the amount of conservation land needed within the PCAs and IBCs. While these factors indicate that it would not be necessary to expand the PCAs and IBCs to provide for 2:1 mitigation of the full 87,820 acres of oak woodland impact anticipated with General Plan implementation, it is likely that some additional conservation land would be needed.

- ***Addressing the Shortfall in Conservation Area:*** As noted above, there are three primary options for addressing the shortfall in the amount of conservation areas relative to the amount of anticipated impact. The County could update and expand the mapped PCAs; the County could determine that the existing provisions in the OWMP are sufficient to allow for identification of additional conservation areas as needed; or the County could modify the OWMP to provide more direction and specific criteria for identifying additional conservation areas as needed. Each option is briefly discussed below:

- *Update and Expand Mapped PCAs:* This would require additional GIS analysis to identify large areas of oak woodlands that could be used for conservation. The prior PCA mapping effort limited the PCAs to areas with a minimum of 500 contiguous acres of woodland and parcels with a minimum size of 40 acres. To map additional PCA areas, these standards would have to be reduced so that more land would qualify as a PCA. Finally, maps of the additional PCA areas would be prepared and presented to the Board for adoption. This would require a large effort from County staff and/or consultants and could raise landowners concerns regarding having their land officially mapped as potentially being used for conservation.
- *Determine Existing OWMP Provisions are Sufficient:* As noted above, the 2008 OWMP allows for land outside of the PCAs to be used for conservation. However, the OWMP states that the County must first determine the land is appropriate for conservation and for mitigating the impacts of a particular project by surveying the mitigation location and determining that it is of equal or greater biological value as the oak woodland proposed to be removed. This determination would be made based on consideration of “habitat elements such as snags, large woody debris, and the diversity and structure of the understory” and comparing these features of both the project site and the proposed mitigation site. This does provide project developers flexibility in meeting their mitigation requirements and ensures that the County will not have to rely entirely on the PCAs for conservation. However, the process and standards for determining that a mitigation location is acceptable do not include any objective or measureable metrics and therefore may be subject to interpretation and inconsistent implementation.

- Retain the Existing PCAs and Identify Specific Criteria for Approving Additional Conservation Areas: The County could expand on the existing provisions in the OWMP that allow for developers to identify conservation opportunities outside of the PCAs. This could be accomplished by defining specific criteria that must be met by these additional conservation lands. Providing more specific, quantifiable standards could help to streamline the process of approving additional conservation areas, eliminate the need for interpretation, and ensure consistent implementation for all projects. Should the Board direct that additional criteria be developed, draft criteria would be presented to the Board with the draft updated General Plan policies. The following are some preliminary concepts that could be included in such criteria:
 - Minimum parcel size of 20 acres (in contrast the existing PCAs were developed using a minimum parcel size of 40 acres);
 - Woodlands shall be diverse in age structure and includes large trees and dense canopies;
 - There are opportunities for active land management to be used to enhance or restore natural ecosystem processes; and
 - Has the potential to support special-status species;

Recommendation: To better provide for availability of oak woodland habitats suitable for conservation, retain the PCAs shown in the 2008 OWMP and establish criteria for identifying additional conservation areas (third bullet above).

5.0 DECISION POINT 7: SPECIAL-STATUS RESOURCE MITIGATION REQUIREMENTS

Determine appropriate mitigation requirements specific to each category of special-status resources (e.g., vegetation communities, plants, wildlife) for inclusion in policies.

Options: Determine whether General Plan policy should incorporate mitigation ratios for special-status biological resources, including vegetation communities, plants and wildlife or determine that pre-determined minimum mitigation ratios are not necessary.

Analysis: Current General Plan Policy 7.4.2.8 outlines an approach to identify important habitat in the County and establish a program for effective habitat preservation and management. The program would develop a conservation strategy that conserves:

- Habitats that support special-status species;

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- Aquatic environments including streams, rivers, and lakes;
- Wetland and riparian habitat;
- Important habitat for migratory deer herds; and
- Large expanses of native vegetation.

Per the current policy, the goal of the conservation strategy is to conserve and restore contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the County. This goal and strategy would be accomplished through implementation of the County's Integrated Natural Resources Management Plan (INRMP), which the County has determined is not a viable option.

Through selection of the mitigation/conservation approach, the County has directed Dudek to evaluate other options to meet the goal of the conservation strategy in lieu of implementing the INRMP. To that end, we are evaluating the effectiveness of establishing mitigation ratios for special-status biological resources, including vegetation communities, plants, and wildlife.

Dudek assumes that the categories of special-status resources will be the same as those defined in the County's General Plan EIR. Based on Board direction, Dudek will provide draft General Plan policies that define County mitigation requirements specific to special-status resources (e.g., vegetation communities, plants, wildlife).

Because the status of individual species can change as frequently as every six months, and because the status of vegetation communities is also updated periodically, the special-status biological resources are defined by categories utilized by resource agencies rather than individually listed in the policy. The approach described below is consistent with Appendix G of the California Environmental Quality Act (CEQA) Guidelines.

Special-status Plants and Wildlife: Consistent with the General Plan EIR (updated to reflect current terminology, special-status species include plants and animals in the following categories:

- Species listed or proposed for listing as Threatened or Endangered under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA);
- Species considered as candidates for listing as Threatened or Endangered under ESA or CESA;
- Wildlife species identified by California Department of Fish and Wildlife (CDFW) as Species of Special Concern;
- Wildlife species identified by US Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) as Species of Concern;
- Plants listed as Endangered or Rare under the California Native Plant Protection Act;

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- Animals fully protected under the California Fish and Game Code;
- Plants that have a California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) of 1A (plants presumed extirpated in California and either rare or extinct elsewhere), 1B (plants rare, threatened, or endangered in California and elsewhere), 2A (plants presumed extirpated in California, but more common elsewhere), or 2B (plants rare, threatened, or endangered in California, but more common elsewhere). The CNPS CRPRs are used by both CDFW and USFWS in their consideration of formal species protection under ESA or CESA.

Sensitive Vegetation Communities: Consistent with the General Plan EIR (and updated to reflect current terminology, status and available data), sensitive habitats in the County include vegetation “alliances” with State ranks of S1-S3 (S1: critically imperiled; S2: imperiled; S3: vulnerable) as identified in the *List of Vegetation Alliances and Associations* (CDFG 2010) and subsequent updates. Additionally, all vegetation “associations” within the alliances with ranks of S1-S3 would be considered sensitive habitats. Alliances and associations are defined by the Federal Geographic Data Committee (2008) as follows:

Alliance: A vegetation classification unit of low rank (7th level) containing one or more associations, and defined by a characteristic range of species composition, habitat conditions, physiognomy, and diagnostic species, typically at least one of which is found in the uppermost or dominant stratum of the vegetation (Jennings et al. 2006). Alliances reflect regional to subregional climate, substrates, hydrology, moisture/nutrient factors, and disturbance regimes.

Association: A vegetation classification unit of low rank (8th level) defined on the basis of a characteristic range of species composition, diagnostic species occurrence, habitat conditions and physiognomy (Jennings et al. 2006). Associations reflect topo-edaphic climate, substrates, hydrology, and disturbance regimes.

The 2004 General Plan EIR used Cal Fire’s Fire Resource Assessment Program (FRAP) land cover data (CDF-FRAP 2002) to identify broad-scale vegetation types within the County. The FRAP data is often paired with the California Wildlife Habitat Relationships System (CWHR) which classifies existing vegetation types important to wildlife. The CWHR system was developed by the CDFW to recognize and logically categorize major vegetative complexes at a scale sufficient to predict wildlife-habitat relationships. Using the 2006 FRAP data, the following general CWHR categories occur within the County:

- Agriculture
- Barren/Other
- Conifer Forest
- Hardwood Forest

Memorandum

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- Hardwood Woodland
- Herbaceous
- Shrub
- Urban
- Water
- Wetland

In some cases sensitive habitats in the *List of Vegetation Alliances and Associations* correspond directly with the CWHR classification system used by FRAP, but typically, the classifications of vegetation in the *List of Vegetation Alliances and Associations* are more detailed. In other words, the sensitive habitats in the *List of Vegetation Alliances and Associations* are generally described at a more specific level of classification than the major (e.g., broad scale) habitat types from the FRAP land cover data. Both FRAP and *List of Vegetation Alliances and Associations* data were used to map sensitive natural habitats (2004 General Plan EIR, Exhibit 5.12-7).

Based on the special-status species criteria described above, Dudek developed a list of special-status species potentially occurring within the County. Dudek reviewed the FRAP (2006) land cover data in the context of habitat for the potentially occurring special-status species within the County. In addition to those CWHR categories considered sensitive habitats (S1-S3) per the CDFW ranking system, a number of the CWHR categories provide habitat for special-status species as defined above. We propose to include mitigation measures for those special-status species habitats (e.g., chaparral, grassland) in addition to the S1-S3 sensitive habitats in order to ensure that the current range and distribution of special-status species within the County are maintained following implementation of the General Plan. In addition to assisting project applicants with identifying mitigation at the project level, this will facilitate analysis of cumulative impacts to biological resources within the County.

With the exception of oak woodlands, which would be mitigated at varying ratios depending on the level of on-site avoidance (see Decision Point 4 above), preservation of the following upland CWHR categories is suggested at a ratio of 1:1 to ensure that the current range and distribution of special-status species within the County are maintained:

- Conifer Forest
- Hardwood Forest
- Hardwood Woodland
- Herbaceous
- Shrub

For the following wetland CWHR categories we suggest creation at a ratio of 1:1 to ensure that the current range and distribution of special-status species within the County are maintained:

- Water

- Wetland

In addition to creation, we suggest preservation at a ratio of 1:1 for herbaceous wetlands, and 2:1 for shrub and tree wetlands to mitigate for temporal loss (the time required for planted shrub and tree wetland to replace the functions lost).

Alternatively, the County may determine that mitigation ratios are not necessary. In this case the project applicant may identify significant impacts to special-status biological resources associated with a particular project, and identify proposed mitigation measures for the County to evaluate.

Recommendation: Using mitigation ratios for special-status biological resources, including vegetation communities, plants, and wildlife as a method of meeting the goal of the conservation strategy. This will be further facilitated by evaluation of Decision Points 8, 9 and 10:

8: IBC Standards

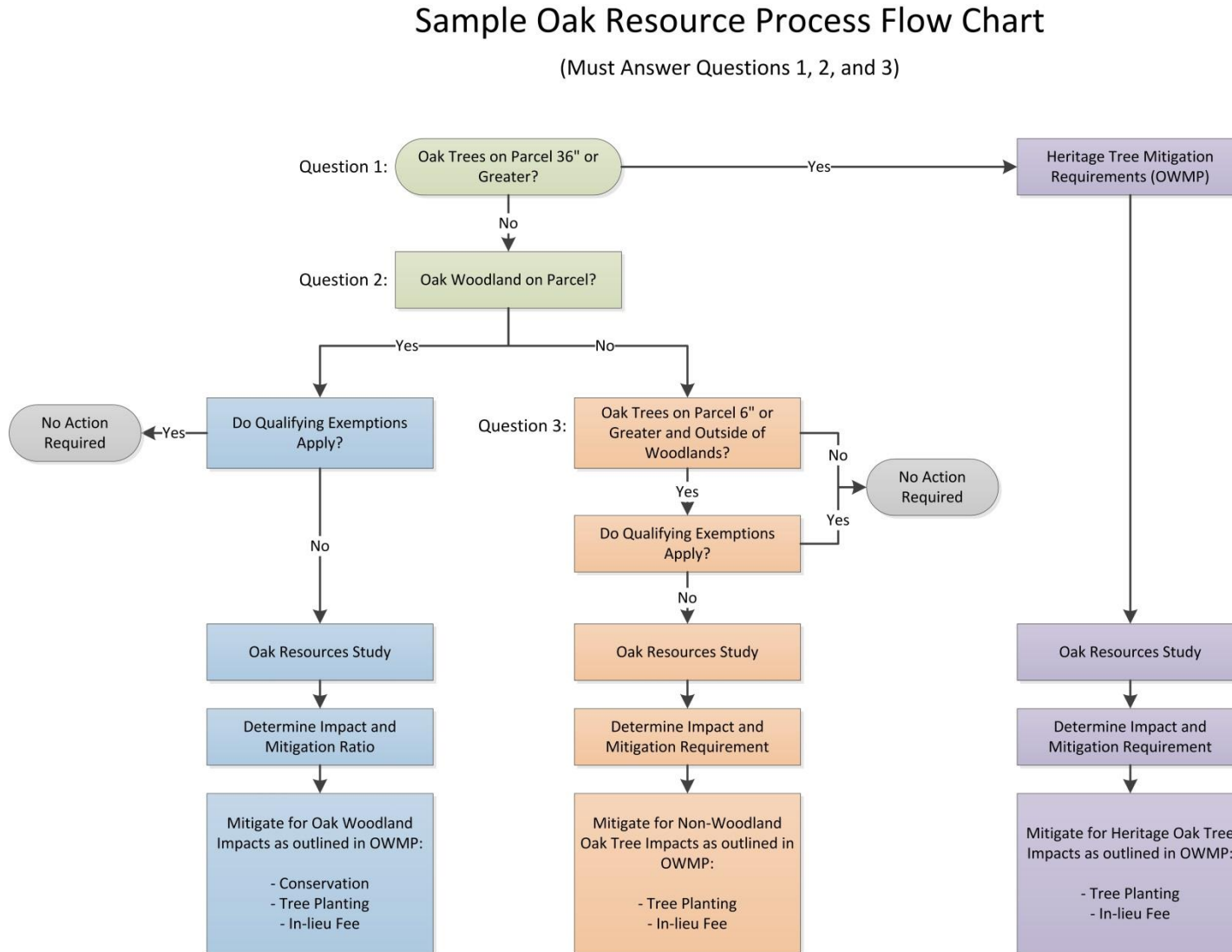
9: Ecological Areas In PCAs and IBCs

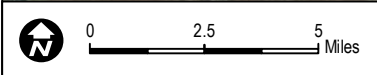
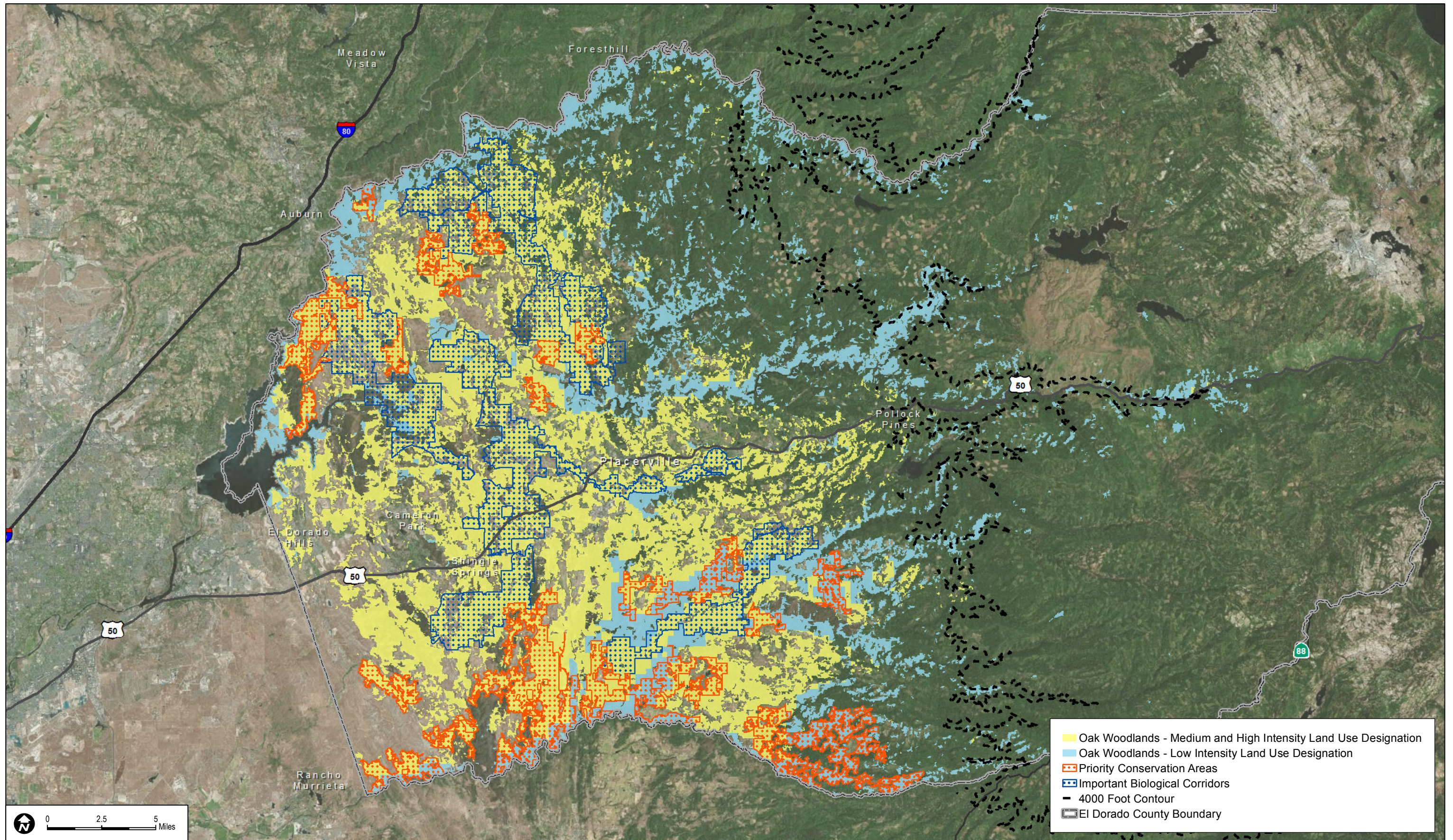
10: Database of Willing Sellers

This recommendation is consistent with current General Plan Policies 7.4.1.1 through 7.4.1.5., 7.4.1.7, 7.4.2.1 through 7.4.2.6, and 7.4.2.9, and would result in minor revisions to current General Plan Policies 7.4.1.6 (which relies on the INRMP to define mitigation for impacts to important habitats) and 7.4.2.7 (which requires the formation of the Plant and Wildlife Technical Advisory Committee (PAWTAC)).

In order to evaluate project-specific impacts, applicants for discretionary projects would be required to provide to the County a biological resources technical report which will identify and map vegetation communities and special-status plants in accordance with the CDFG 2009 *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* and subsequent updates, and will be consistent with the *List of Vegetation Alliances and Associations* (CDFG 2010) and subsequent updates. The biological resources technical report will also be required to identify special-status species (as defined above and as subsequently updated) known to occur or potentially occurring on site.

Figure 1. Sample Oak Resource Process Flowchart





DUDEK SOURCE: Bing Maps 2014; FRAP 2006; El Dorado County 2014

FIGURE 2
Priority Conservation Areas, Important Biological Corridors, and Oak Woodlands in El Dorado County