



April 1, 2008

Board of Supervisors  
El Dorado County  
Placerville, CA 95667

To the Board of Supervisors:

I am writing to object to the County's proposal to adopt the final OWMP prior to the development and implementation of the Integrated Natural Resources Management Plan (INRMP) which is required to be adopted by 2009 according to the 2004 General Plan Section 7.4.2.8. The information required to be developed under the INRMP is necessary for the County to develop an OWMP based on accurate information and adequate analysis. The County's proposal nevertheless to adopt an OWMP -- and allow development to occur based on that OWMP - prior to its completion of the INRMP process is contrary to the California Environmental Quality Act in several respects.

First, the County has segmented the approval of the OWMP from the approval of the INRMP, even though the OWMP is but one component of the INRMP and should therefore either be considered and approved at the time the INRMP is adopted or at a later point when the OWMP could tier to the INRMP findings regarding the information-based determinations set forth in General Plan Policy 7.4.2.8.

Second, in approving the OWNP before the information in the INRMP has been fully developed, the County is failing to develop and/or procure the information necessary regarding the preservation of important habitats and/or contiguous blocks of un-fragmented habitat prior to project approval, as required by CEQA, Public Resources Code Section 21160.

Finally, the OWMP improperly defers the identification of necessary mitigation for the project by stating that measures to ensure protection of important, un-fragmented habitat in the County will be identified at a later point by the INRMP. What will happen if the INRMP determines that mitigation measures to avoid significant impacts to important habitat and/or the sensitive biological resources that comprise or depend on that habitat require the preservation of areas that may have been already developed under the authority of the OWMP? Here, for example, the OWMP assumes that no preservation of oak habitat need occur within the Highway 50 corridor prior to the final issuance of the

Submitted by Craig Thomas

at Board Hearing of #37

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INRMP that is supposed to identify such habitat that must be preserved within the County to ensure species survival. Without the INRMP in place, the County cannot assume that future mitigation identified in the INRMP will be feasible and/or capable of implementation with regard to oak woodlands. In sum the County's process puts the cart before the horse and is thus contrary to CEQA.

Sincerely,

A handwritten signature in black ink that reads "Craig Thomas". The signature is written in a cursive, slightly slanted style.

Craig Thomas  
Center for Sierra Nevada Conservation  
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Georgetown, CA 95634