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Shingle Springs

Board of Supervisors
El Dorado County
Agenda Item 51 -
INRMP scope of work
July 22, 2008

This RFP is far from being ready to send anywhere.

The scope of work suggested is not appropriate to the job of getting an INRMP in place that accomplishes the goals set out by this Board and the General Plan for the implementation of the General Plan.

The studies suggested are not needed and the studies needed are not suggested. While it might be argued that the studies needed could be interpreted as being possible the focus of the discussion is around land use mapping issues rather than around biological issues.

Until it can be positively asserted that the scope of work is clear and unambiguous as to what it is this BOS is expecting to be able to do with the studies I am afraid that this process will be directed to creating a situation where none of the deficiencies in the policies of the General Plan can be remedied and few of the appropriate mitigations can be accomplished.

This board has consistently recognized the need to "fix" the IBC's for example. In order to do so there needs to be a study performed that directly relates to defining why we are in fact creating corridors and how they are to function. The biological function of the corridors is irrespective of the land use patterns.

The suggestion that we need studies of the land use patterns and how they affect biology is not correct. Saving/Greenwood spent a large amount of taxpayer money doing just that. Fortunately we have a record of all that relevant work and it does not need to be repeated.

Staff seems bent on redirecting attention to the Land Use maps and past policy decisions they would like to rescind. The fact remains that Greenwood modeled all of these policy issues and came to the conclusion that they had little if any effect on connectivity. There is no reason to start down the path of repeating that work except to spend dollars we do not have.

To quote from the abstract of the Greenwood study: "We modeled combinations of constraints from the 1996 County General Plan and parcel data- slope, stream buffers, oak canopy retention, existing development, public ownership, regional clustering, and acquisition programs- and overlaid development outcomes onto the land cover data. We then calculated metrics of habitat loss and fragmentation for natural land cover types.

Submitted by Art
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at Board Hearing of 7/22/08
#51

Rural residential development erodes habitat quality much more than habitat extent. Policy alternatives ranging from existing prescriptions to very restrictive regulations had marginal impact on mitigating habitat loss and fragmentation. Historic land parcelization limits mitigation of impacts by the current General Plan prescriptions that only apply when a parcel required subdivision before development. County-wide ordinances were somewhat more effective in preserving habitat and connectivity.. These solutions may not provide enough extra protection of natural resources to justify the expenditures of "political capital" required for implementation. Custom, parcel based acquisition scenarios minimized habitat loss and maximized connectivity. Better analysis of public policy and planning design may be a more effective "smart growth" tool than generic policy prescriptions."

Under "Future Directions" Greenwood states;" More investigation of the effects of riparian corridors on habitat connectivity is needed, including the effectiveness of stream setbacks and the development of methods to characterize linear features, as opposed to the two dimensional patch features analyzed here."

This is study number one that should be commissioned.

Under "Conclusions" Greenwood states or El Dorado County, our study concludes that the most effective way to maintain wildland oaks in large continuous patches would be a land acquisition program focused on those critical areas of connectivity, often referred to as habitat corridors."

In addition we need an attorney led discussion of whether the ultimate studies we commission meet the test of addressing those items this Board specifically set over to the INRMP by the OWMP and whether they meet the test of dealing effectively with the issues raised in the OWMP lawsuit.

Basically, the 2004 General Plan concept was to increase the densities of growth along the 50 corridor and further restrict "suburban sprawl" in the outlying areas. The contention in the lawsuit is they do not want growth in the 50 corridor either and oaks are their excuse. I fully believe that we need the competently prepared scientific analysis of what we need to actually do in the 50 corridor for connectivity and why. We need this "sufficient evidence in the record" to determine what we need to do and justify not doing what is determined in fact has little biological value.

This staff report is simply too far removed from an understanding of what needs to be done and why to go forward with anything past forming the stakeholder's group to assure that when we have defined what needs to be done that it is done efficiently.

Thank you,



Art Marinaccio