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El Dorado County Planning Services
Attn: Monique Wilber
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Sent via e-mail to: monique.wilber@edcgov.us

Subject: Oak Woodland Management Plan/Negative Declaration

To Whom It May Concern:

I am writing to provide expert information for your consideration, regarding the El Dorado County Oak Woodland Management Plan Initial Study and Negative Declaration (“OWMP”).

My professional qualifications include an M.S. and Ph.D. from the Department of Botany, University of California at Davis (1982). I am Professor of Biology at Mills College, where I have been teaching and conducting research since 1985. My current research interests include working to establish a major research center for *ecological* restoration in California, developing scientific approaches to restoring plant populations and ecosystems, the ecology of rarity in vascular plants, and photosynthesis and water stress acclimation in perennial plants.

I am the author or co-author of five books including *Oaks of California* (1991), *California's Changing Landscapes: The Diversity and Conservation of California Vegetation* (1993) and *California Deserts: An Ecological Rediscovery* (2008). I have authored over thirty-five research publications and twenty-two technical reports.

My work on oaks was cited six times in the OWMP (in Appendix A—Background and Support Information), relative to the descriptions of oak species and threats to their survival.

In my opinion, the General Plan requirement “to fully compensate for the impact to oak woodland habitat” (General Plan Policy 7.4.4.4) is not met in the OWMP. This failure appears to be related to an essential misunderstanding of the definition of “oak woodland habitat.” Oak woodland habitat is not limited simply to individual oak trees. The OWMP would allow the size of anoak woodland to be estimated by measuring individual oak tree canopies, thereby underestimating the size of actual oak woodland habitat. Within the

scientific community, and as understood by biologists in the California state Resources Agency, the term “oak woodland habitat” refers to vegetation in which the dominant tree species are oak (at least ten percent canopy cover), but which are highly complex and variable plant communities containing a rich assemblage of many different plant species. As such, these important plant communities provide habitat for hundreds of species of animals, where oak is the foundation of the food web.

Measures of oak woodland habitat, for the purposes of mitigation, must be based upon the whole habitat which includes the full suite of associated species in the specific oak woodland community. Depending upon the type of oak community (valley oak woodland, blue oak woodland, blue oak-foothill pine, montane hardwood, or montane hardwood-conifer), the associated woodland species will vary. These associated species, which together with the oak species form oak woodland habitat, do not receive any protection in the OWMP. As a result, in my opinion--other than preserving individual oak trees for their esthetic value--the OWMP as it is currently written fails to accurately analyze or mitigate for the loss of oak woodland habitat in El Dorado County, and cannot therefore be adopted under a Negative Declaration for significant impacts.

In addition, the Priority Conservation Areas identified in the El Dorado County OWMP fail to provide for connectivity of oak woodlands in significant regions north and south of Highway 50. An effective management plan must include requirements to preserve connectivity of oak woodland habitat and incorporate wildlife movements and corridors throughout the county. Regions of the Highway 50 corridor contain important oak woodlands, but these were mysteriously left out of the Priority Conservation Areas. The high rate of development in this corridor increases the significance for natural resource values of the remaining habitat, and heightens the need to preserve them. In my opinion, strengthening the protection of these remaining oak woodlands within Priority Conservation Areas will substantially improve the OWMP to achieve county goals in the general plan and to comply with the Oak Woodland Conservation Act of 2001.

Thank you for the opportunity to comment on the El Dorado County Oak Woodland Management Plan /Negative Declaration.

Sincerely,

Bruce Pavlik, Ph.D.