

El Dorado County Board of Supervisors  
330 Fair Lane  
Placerville, CA 95667

October 30, 2007

Subject: Item 36 October 30, 2007 Oaks Woodland Management Plan and Vineyard Development

Dear Supervisors,

The wine industry is a wonderful economic opportunity for El Dorado County and its residents. I want to see the industry thrive without unnecessary interference, but not at the expense of the property rights of the rest of the county as we struggle with implementation of the Oak Woodland Management Plan (OWMP). Saddling the existing residential community and future residential and commercial development with mitigation of unchecked conversion of Oak Woodland (OW) to vineyards doesn't seem consistent with the General Plan and EIR. There must be an accounting of the significance of GP policies on OW conversion.

General Plan Policy 7.4.4.4 exempts "agricultural cultivation and action" from the effort and requirement to provide mitigation of developmental impacts on OW. Given the unknown acres that have been recently converted and will be subject to conversion to vineyards, is this policy consistent with the remainder of the Conversation and Open Space element of the General Plan and EIR (GPEIR collectively)? How can agricultural operations be exempt from Oak Woodland rules when an unknown, yet potentially significant number of acres are subject to complete removal of oak trees for conversion to vineyards? I believe this recent and future conversion of oak woodland accommodated by this exemption is far in excess of that allowed or envisioned in the GPEIR. How will the impacts of this conversion be assessed? Are the homeowners and residential developers to be saddled with all the mitigation while agriculture is exempt? Will the GPEIR assumptions realistically mitigate the wholesale removal of these unknown acres of oaks that is enabled and/or accommodated by the current (and proposed) winery ordinance?

Where is the fairness to a subdivision developer who must mitigate every oak stem removed, or the homeowner building a garage who must mitigate impacts on one oak tree? Is this all consistent with the GPEIR (and common sense)? I think not.

I asked similar questions previously during the Miraflores project review. Therefore, **I request staff consider my comments of March 17, 2006 on that MND regarding land use and oak trees be included in the OWMP process.** The unanswered questions are there and truly applicable to the OWMP. I encourage staff to review the multitude of rezone projects approved in the last seven years to quantify the amount of oak woodland and number of trees that have fallen to the ax during the "grape rush" encouraged by the current winery ordinance.

The current and proposed process is deeply flawed and the fairness and impacts of this exemption need to be assessed in light of the whole record.

Thank you for your time.

Sincerely,



Ken R. Greenwood  
Straight Shot Consulting