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

RE: Oak Woodland Management Plan

Dear Board,

I would point out that the State of California has state codes regarding the development of oak woodland management plans, specifically:
FISH AND GAME CODE SECTION 1360-1372. 1360. This article shall be known, and may be cited, as the Oak Woodlands Conservation Act.

The act includes definitions of oak woodlands and management plans, including the following:

"Oak woodlands" means an oak stand with a greater than 10 percent canopy cover or that may have historically supported greater than 10 percent canopy cover.

"Oak woodlands management plan" means a plan that provides protection for oak woodlands over time and compensates private landowners for conserving oak woodlands.

"Special oak woodlands habitat elements" means multi-and single-layered canopy, riparian zones, cavity trees, snags, and downed woody debris.

The potential impact of development from the General Plan was assessed in the General Plan Draft Environmental Impact Report (GPDEIR). Specifically under Section 5.12, Biological Resources, Section 5.12.2, Environmental Impacts and Mitigation Measures, the potential impacts to oak woodlands were assessed. On page 39 of Section 5.12, the analysis states:

"Most of the development pressure in El Dorado County is likely to occur in the foothills near the U.S. 50 corridor . . ."

"The analysis prepared by Saving and Greenwood (2002) is relevant to the assessment of potential impacts on wildlife habitat described in this EIR because of its similarities with the 1996 General Plan Alternative. The authors modeled future development in western El Dorado County to assess ecological impacts of expanding urbanization. They focused their analysis on what they termed "wildlands"—large areas of contiguous habitat composed primarily of oak woodland. Saving and Greenwood calculated habitat loss and fragmentation incorporating the effects of 1996 General Plan policies that were adopted to preserve and protect habitat."

"Saving and Greenwood concluded that implementation of the 1996 General Plan would have a substantial adverse effect on wildlands and that General Plan policies only marginally mitigated habitat

loss and fragmentation. The authors found that much of the impact on wildlands was associated with habitat fragmentation. The modeling results predicted that the amount of oak woodland habitat types physically lost to urban development would be only about 4% of the total, but fragmentation would convert 40% of the remaining wildlands to what they termed marginal or urban woodlands. In other words, areas that once functioned under a more natural state and presumably provided functional habitat for wildlife would be degraded, either because of proximity to urban land uses or by isolation from larger patches of contiguous natural vegetation. These impacts would presumably increase when future agricultural development, not included in the modeling, is also considered. Connectivity between northern and southern wildlands was raised as a particular concern because increased urbanization along the corridor threatens to create a separation between large areas of contiguous habitat in the northwest and southwest portions of the county. Saving and Greenwood also concluded that subdivision occurring before the development of the General Plan limited the effectiveness of the policies to mitigate the effects of prior habitat loss and fragmentation. The authors noted that the General Plan policies apply only when a parcel requires subdivision before development."

To summarize, the analysis in the GPDEIR suggests that the primary impacts to oak woodlands will occur in the lower elevations, especially adjacent to Highway 50, and that fragmentation will be the major cause of those impacts.

I had occasion to examine the Draft El Dorado County Oak Woodland Management Plan, dated August 2007. The draft plan included Priority Conservation Areas (PCA's) as well as Oak Woodland Corridors, both 40 ac. and larger parcels coincident with perennial streams, and, those forming north - south corridors across Highway 50. This plan addressed both fragmentation and connectivity across Highway 50.

Since that time, the Board has directed staff to exclude Oak Woodland Corridors, and has altered the PCA's by excluding any public lands and any lands designated as LDR on the General Plan land use designation maps. This reduced the size of PCA's, and has eliminated any connections between them.

The end result of these actions by the BoS is to increase the potential fragmentation of oak woodlands in El Dorado County and make the Oak Woodland Management Plan completely ineffective as a mitigation for development impacts to El Dorado County oak woodlands. The moneys collected will only go toward preserving large blocks of oak woodlands that are currently under little threat of fragmentation, while eliminating those portions of the landscape at greatest risk. If the County claims to have mitigated impacts to oak woodlands from proposed development by adoption of the OWMP in a CEQA document, it does so at great potential risk of citizen litigation.

Sincerely,



Ray P. Griffiths

Please send copies of this letter to the El Dorado County Planning Commissioners and include it as comment on the Oak Woodland Management Plan.