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# 36  
Draft  
OWMP

December 19, 2007

TO: Monique Wilber, Senior Planner  
El Dorado County Planning Services

FROM: Janet Postlewait, Principal Planner  
Department of Transportation

RE: Comments on the Revised Oak Woodland Management Plan (OWMP)

DOT has the following comments and suggested changes to the Revised OWMP, on the last paragraph of page 5 and the first two paragraphs of Page 6, shown in underline and strikeout format.

Comments

The current language within the Revised OWMP addressing public road projects is not completely accurate and may be difficult to implement. Capital Improvement projects anticipated by DOT are those projects that involve improved safety and operations by improving congestion and traffic flow, as well as incorporating safety features. This would include improvements such as road widening or re-alignments to improve level of service (LOS), intersection improvements such as signalization and/or installation of extra turn lanes to improve safety and operations as traffic increases on the existing road system.

Additionally, limiting an exemption to apply only within the County right-of-way is problematic in many cases. There are many older public roads throughout the County where County rights-of-way have not been formally acquired. For example, many southern portions of Latrobe Road have prescriptive rights-of-way, wherein the adjacent property lines are defined as the road centerline.

DOT is also concerned that there is no established threshold of significance to determine a level of impact upon oak woodlands— only a project specific subjective opinion rendered by the County, as stated in Appendix A, page A29. This makes it very difficult to maintain consistency and clear interpretation when it comes time to implement Policy 7.4.4.4 with regard to road projects. The establishment of a consistent threshold of significance would clarify and simplify these issues consistently for all public road projects and linear utility projects that are not new roads or roads internal to new development. Also note that Option A of Policy 7.4.4.4 would never apply to a road project because there is no room to retain a tree in the middle of a public road.

To address all of these issues, DOT suggests a threshold of one acre of oak woodland canopy to define a level of significance with regard to the impacts of road improvement projects on oak woodlands and mitigation under Policy 7.4.4.4. In other words, all road and utility projects that propose to remove an area of oak woodland canopy that is one acre or less is exempt from Policy 7.4.4.4. Conversely, all road and utility projects that propose to remove an area of oak woodland canopy that exceeds one acre is subject to the mitigation set forth in Policy 7.4.4.4, Option B.

The following are suggested changes to the paragraphs on the bottom portion of Page 5 and the top of Page 6 of the Revised Draft OWMP (shown in underline and strikeout format), to address these issues.

Public Road Safety Projects Exempt from Policy 7.4.4.4 – Oak woodland canopy removal necessary to complete County operational and safety capital improvement projects, including road widenings and realignments which are necessary to affect the public's health and safety the safe movement of people and goods of the public in existing public road rights-of-way as well as acquired rights-of-way necessary to complete the project; or, removal of oak woodland canopy necessary to comply with the safety regulation of the Public Utilities Commission and necessary to maintain a safe operation of utility facilities, within a public road right-of-way or utility easement, is exempt from Policy 7.4.4.4. Additionally, Option A of Policy 7.4.4.4 is not applicable, because the linear nature of these public projects precludes the ability to retain oak woodland on site.

~~This exemption to Policy 7.4.4.4 the oak woodland canopy retention and replacement standards does not apply to new proposed public roads within the County Circulation Element, nor to internal circulation roads within new development. Additionally, this exemption does not apply to any road re-alignment projects or utility projects that propose to remove significant oak trees within an oak woodland habitat~~

~~Public roads right-of-way and other linear utility projects which are not exempt and propose to remove oak woodland canopy cover shall calculate the project area (e.g., 10 feet wide by 40 feet long is 400 square feet), the total amount of oak woodland canopy cover, and the amount of oak woodland canopy, in order to determine the percentage of canopy retention and the replacement mitigation.~~

The level of significance threshold for public road improvements right-of-way and other linear utility projects which are not exempt is one acre of solid, continuous, oak canopy proposed to be removed. In order to calculate the replacement mitigation under Policy 7.4.4.4, Mitigation Option B, the measurement of the area of canopy area shall begin at the existing edge of pavement (or edge of improved road surface for unpaved roads) and shall not include the portion of canopy overhanging the roadway. Any amount of tree canopy to be removed that exceeds the one acre threshold is subject to Mitigation Option B of Policy 7.4.4.4.