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April 29, 2008

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

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BOARD OF SUPERVISORS
EL DORADO COUNTY

Re: Oak Woodland Management Plan
Initial Study/Negative Declaration

To the Board of Supervisors:

I have been asked to submit this letter on behalf of the Community Coalition, a diverse group of stakeholders, including landowners, developers, engineers and land planners, land use attorneys, real estate agents, agriculturalists, professional foresters, biologists, botanists and arborists. Those individuals and firms have contributed their knowledge and expertise and have provided extensive input throughout the development of the Oak Woodland Management Plan throughout the public review process. Those same individuals have contributed to this letter on behalf of the Community Coalition.

We have reviewed a number of comment letters received by the County and believe that the writers have misunderstood or misconstrued the purposes and application of the Oak Woodland Management Plan. This letter is provided to clarify those issues.

I. Introduction and Background Information

The 2004 El Dorado County General Plan ("General Plan") contains multiple policies related to the protection of wildlife habitat, special-status species, and opportunities for wildlife movement. Many of these policies were identified as mitigation measures in the General Plan Environmental Impact Report ("EIR") and were incorporated by the Board of Supervisors into the text of the General Plan. The General Plan is, therefore, "self-mitigating" in the sense that implementation and enforcement of the General Plan policies implements the mitigation measures identified in the EIR.

Despite inclusion of these mitigation measures into the General Plan, the Board of Supervisors determined that implementation of the General Plan would nevertheless result in Significant and Unavoidable impacts to biological resources. The mitigation measures incorporated into the General Plan as policies and implementation measures were determined to lessen the impacts, but not to below a level of significance.

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Accordingly, at the time of adoption of the General Plan, the Board of Supervisors approved a Statement of Overriding Considerations, including detailed findings that specific economic, legal, social, technological and other considerations supported adoption of the General Plan despite the unavoidable impacts.

The principal General Plan policy related to the protection of oak canopy and oak woodlands is Policy 7.4.4.4. This policy and related Implementation Measure CO-P outline the framework for mitigation of impacts to the County's oak resources, and the criteria for preparation of an Oak Resources Management Plan.

Policy 7.4.2.8 provides for the preparation of an Integrated Natural Resources Management Plan ("INRMP") designed to mitigate impacts to species and habitats which occur during implementation of the General Plan. Development and implementation of the INRMP consists of four basic steps, as directed by the Board of Supervisors at their meeting of July 20, 2007:

Inventory: Develop an initial inventory and mapping of a range of habitat types, including habitats that support special status species, aquatic environments, wetland and riparian habitats, habitat for migratory deer herds and large expanses of native vegetation.

Prioritize: Develop a strategy for determining the relative priority of important habitats based on criteria identified in the General Plan, including large contiguous blocks of important habitats, presence of special status species, connectivity to adjacent protected lands and important habitat, parcels which preserve natural wildlife movement corridors or opportunities for terrestrial wildlife crossings under major roadways, and lands which meet multiple criteria.

Acquire: Acquire lands from willing sellers, either through conservation easements or in fee, unless the resources are already protected on public lands or on privately-owned Natural Resource lands. Develop mitigation banks or other programs to facilitate mitigation of impacts to biological resources resulting from projects approved by the County which impact important habitats.

Protect: Incorporate acquired lands into the Ecological Preserve overlay area. Evaluate each property or conservation easement to determine whether the resources would benefit from restoration or management actions. Develop a habitat monitoring program to identify adaptive management strategies to enhance the effectiveness of management activities.

On April 18, 2006, the County entered into a Settlement Agreement of litigation related to the County's adoption of the 1996 General Plan, El Dorado County Taxpayers for Quality Growth, et al. v. El Dorado County Board of Supervisors, et al. (Case No. 96 CS 01290). In the Settlement Agreement, the County agreed that it would implement Option B of Policy 7.4.4.4 (contribution to INRMP conservation fund) in lieu of Option A (canopy retention standards) only after the County had adopted the "oak woodland portion of the Integrated Natural Resources Management Plan described in Policy 7.4.2.8", unless and until Policy 7.4.4.4 was amended or repealed. The settlement agreement implicitly acknowledged that the County could separately consider and adopt the oak woodland portion of the INRMP.

The General Plan and Policy 7.4.2.8 do not expressly identify or describe the "oak woodland portion" of the INRMP. In the absence of explicit language in the General Plan, the Board of Supervisors has the authority to interpret the General Plan and to define what will be contained in the "oak woodland portion" of the INRMP. Here, the Board of Supervisors has done so, determining that the Oak Resources Management Plan described in Policy 7.4.4.4 and Implementation Measure CO-P would be expanded to incorporate the essential components of the INRMP. This broader program, now titled the Oak Woodland Management Plan ("OWMP") satisfies the requirements of the "oak woodland portion" of the INRMP.

The General Plan contemplates that the OWMP will be developed and become operational within two years of adoption of the General Plan (Measure CO-P), while the INRMP is expected to be completed within five years (Policy 7.4.2.8). Measure CO-M provides that the INRMP will be developed and implemented in phases, including the mitigation assistance program and Conservation Fund within two years, and acquisition strategy and monitoring program within three years of General Plan adoption. Actual acquisition of conservation easements can begin following completion of the initial inventory and mapping. Management strategies and adaptive management of the program are ongoing activities. Clearly, the County did not contemplate that all land use approvals requiring mitigation for impacts to biological resources would be put on hold for five years pending completion of the INRMP.

The County developed an inventory of and mapped all oak woodlands in the County based on available FRAP mapping. After considerable analysis and a number of public meetings before the Planning Commission and the Board of Supervisors, the Board directed that the County's oak woodland conservation priorities, consistent with the requirements of the INRMP, would be to protect existing large expanses of oak woodlands that are generally unfragmented and are less likely to become fragmented

through implementation of the General Plan. These areas are designated Priority Conservation Areas ("PCAs") in the OWMP. Additionally, the County has provided for acquisition of PCAs from willing sellers by conservation easement, and has incorporated an adaptive management strategy to protect the resources within the PCAs once acquired.

During this process, the County evaluated the application of Policy 7.4.1.6 and Implementation Measure CO-U. The Board of Supervisors determined that Policy 7.4.1.6 is provided in furtherance of General Plan Objective 7.4.1 which provides "The County shall protect State and Federally recognized rare, threatened, or endangered species and their habitats consistent with Federal and State laws." Accordingly, the Board directed that important habitats subject to the enhanced mitigation requirements of Policy 7.4.1.6 and Implementation Measure CO-U would be identified through the full INRMP process, but that oak woodlands alone, including areas identified as PCAs would not be subject to those requirements except where rare, threatened or endangered species are also present within the oak woodland.

II. The OWMP protects and preserves oak woodlands; oak canopy is the unit of measure for determining both impact and mitigation.

General Plan Policy 7.4.4.4 utilizes tree canopy as an objective measurement by which to determine first, as a threshold matter, whether the policy applies to a given project, second, to quantify the impact which must be mitigated and, third, which of the mitigation options would apply to the project.

Several letters received by the County suggest that use of tree canopy to measure impact and determine the extent of mitigation is inadequate, and that the County should instead calculate impacts to areas beyond the tree canopy, which variously include the oak canopy and shrub layer, or the oak canopy, shrub layer and grassy areas in between, or the oak canopy, shrubs, grasses and a buffer circumscribing the entire area. This suggestion should be rejected by the County.

Use of a unit of measurement other than tree canopy is not supported by the plain language of the General Plan. The threshold of implementation of Policy 7.4.4.4 is based on "total canopy cover by woodlands habitats" (emphasis added). Policy 7.4.4.4 further specifies "tree canopy retention standards" including a quantitative retention table based on "canopy cover." Policy 7.4.4.4 clearly utilizes tree canopy as the objective measurement of impacts and for the determination of mitigation requirements. Public Resource Code Section 21083.4, which requires assessment of impacts to oak woodlands

under CEQA and application of certain mitigation measures, also defines oak woodlands based on a unit of measurement applicable to individual trees (trees over 5 inches diameter at breast height).

The use of “canopy cover” as the unit of measurement also captures oak canopy in areas that might not otherwise be classified as “oak woodlands”. For example, at higher elevations in the County, black oaks begin to integrate with conifer forests. The General Plan policies requiring retention of “oak canopy” nevertheless apply to these oaks in areas that ordinarily would not meet the definition of “oak woodlands”, but would more properly be defined as one or more types of conifer forests.

Moreover, if we were to interpret the County’s policies as requiring retention and replacement of all other vegetation between the oak canopy, it would be impossible for an applicant to replace oak woodlands onsite, which is clearly permitted under the General Plan. Defining “oak woodland” under Policy 7.4.4.4 to mean the trees, shrubs and gaps in between, for all practical purposes refers simply to the entire land area. Clearly, land cannot be replaced, but trees can be replanted. However, to replant trees within the “gaps” in an oak woodland would ultimately increase tree canopy but would not increase or “replace” oak woodland. In fact, it sets up an imponderable wherein the replanting of tree canopy within the gaps within an area of oak woodland might be considered as a further impact requiring yet more mitigation.

Use of this definition would destroy the incentive Policy 7.4.4.4 creates to actually protect trees, because shrubs and grasses would be treated equally. A project could remove all the oak trees, retain a grassy area now defined as oak woodland, and claim to meet the retention requirement of Option A. Units of measurement other than canopy may work in other situations, but not under Policy 7.4.4.4. This interpretation is simply unworkable and would be inconsistent with the General Plan.

It is important to note that, while the OWMP carries forward policies utilizing tree canopy as the measurement criteria, the retention requirements of Option A and the acquisition of conservation easements within the PCAs under Option B will protect and preserve oak woodlands including the full range of important habitat elements.

III. The OWMP protects oak woodlands of equal or greater biological value.

As described above, the early steps in preparation of the OWMP included an initial inventory and mapping of all identified oak woodlands in the county, based on FRAP mapping data. The mapping analyzed a number of other criteria, including land

use designation, parcel size, location and extent of existing development within the areas mapped as oak woodlands.

Based on the oak woodland inventory and mapping, the County began the process of determining which of the mapped areas should be identified as priority lands for conservation. A number of public hearings were held before both the Planning Commission and Board of Supervisors on this issue. The Board determined that the objective of the INRMP with regard to oak woodlands would be to conserve large expanses of contiguous blocks of oak woodland habitats to offset the effects of habitat loss and fragmentation elsewhere in the county through implementation of the General Plan.

The County considered a broad range of alternatives, such as the inclusion of parcels as small as five acres, the inclusion or exclusion of lands within the Community Regions and Rural Centers, and the inclusion or exclusion of lands designated for Low Density Residential (LDR) development. After extensive public testimony and due consideration, the Board of Supervisors determined that the conservation efforts should focus on large, contiguous blocks of oak woodlands which, because of their size, are likely to support a broader range of species, particularly those animals with larger home range requirements. Accordingly, a minimum block of 500 acres of contiguous oak woodland habitat was established as one criteria for the PCAs.

Additionally, the Board directed that oak woodlands within Community Regions and Rural Centers, as well as lands designated LDR would not be included within the Priority Conservation Areas. These lands are generally designated for higher intensity development within areas of the county served by transportation facilities, sewer, water and other services necessary to accommodate new development. The Board recognized that the oak woodlands existing within those areas were already fragmented or were likely to become fragmented through the implementation of the General Plan. The Board concluded that, for a number of reasons, it was inappropriate to direct conservation efforts into those areas that were, essentially, designated for future fragmentation. The Board, therefore, instructed staff to exclude from the PCAs those areas within Community Regions, Rural Centers and lands designated for Low Density Residential development.

Where an applicant proposes to dedicate an offsite conservation easement in lieu of either onsite replanting or the payment of a fee, the OWMP requires an analysis of the relative habitat values of the area to be impacted and the area to be conserved and offered as mitigation. This requirement was incorporated into the OWMP to provide for the

possibility that conservation easements might be proposed in areas not designated as PCAs, but perhaps adjacent to or near a proposed development.

Some of the comments submitted suggest that the OWMP is inadequate because it does not require a similar analysis for projects that will mitigate impacts by the payment of an in-lieu fee to the County's Conservation Fund. This is simply not the case. The OWMP is a landscape-level conservation and mitigation assistance program. Individual projects subject to CEQA review must generally complete a biological report, which would include an assessment of the resources present and impacts resulting from project implementation. One option for mitigation of those impacts is the payment of a fee to the County's conservation fund. Those fees collected by the County will be accumulated and used to acquire large contiguous blocks of oak woodlands within PCAs.

The PCAs have been designated by the Board as those areas which best meet the County's conservation objectives. The purpose of landscape-level conservation plans is to realize economies of scale by protecting large areas at minimum cost. The identification of PCA's in areas of more urbanized General Plan land use designations would not meet that purpose, and would conflict with the land use goals of the General Plan. The PCA's are large expanses of native vegetation located in areas not presently fragmented and unlikely to become fragmented through implementation of the General Plan. Because of the size and location of the PCAs, this conservation strategy will support a broader range of species, including many of the larger mammals, will minimize conflicts between wildlife and human activity, and maintain greater ecosystem values with reduced edge effects as compared to an approach focused on conservation of smaller parcels in more urbanized areas.

IV. The OWMP mitigates potential fragmentation of oak woodlands resulting from implementation of the General Plan.

Loss and fragmentation of wildlife habitat was identified in the General Plan EIR as a significant effect associated with implementation of the General Plan. The EIR contained an exhaustive discussion of this issue, and included an analysis of impacts based on the intensity of the land uses identified in the Land Use element of the General Plan. Not surprisingly, the effects of habitat loss and fragmentation were determined to be most severe in areas designated for the highest intensity land uses, primarily within the Highway 50 corridor.

The EIR included a review of research studies on this issue, including a study by Saving and Greenwood based on the 1996 General Plan.¹ Saving and Greenwood concluded that only about 4% of the habitat would be physically lost to development, but that fragmentation would convert about 40% of the remaining wildlands to what was characterized as “marginal or urban woodlands”. In addition, increased urbanization along the Highway 50 corridor and its impact on the connectivity between wildlands in the northern and southern portions of the county was identified as a matter of concern.

To address the issue of north-south connectivity, Saving and Greenwood conducted an analysis of a “land acquisition” model wherein key parcels might be acquired across the Highway 50 corridor to ensure connectivity of lands to the north and south. Although the model did not produce the desired results, in that the connection was not maintained, the Saving and Greenwood study theorized that it would be possible to develop a scenario which would achieve that goal.

Highway 50 through El Dorado County was designed and built during the 1960’s, at a time when wildlife corridors and habitat connectivity were given little, if any, consideration. As a result, the highway as constructed is a major physical impediment to north-south wildlife movement. If Highway 50 were built today, the designers would likely incorporate bridges or equivalent structures across drainage courses along with other design features to promote wildlife movement beneath the highway. Instead, the 1960’s design utilizes predominately pipes and culvert structures to convey water under the highway, but those facilities are of limited utility to most wildlife, particularly larger mammals.

One significant exception is the bridge where Highway 50 crosses Weber Creek. Primarily because of topographic constraints, a bridge spanning the Weber Creek canyon was incorporated into the design of Highway 50. Today, it represents the only truly viable wildlife crossing under the highway from Placerville to the western county line.

Some of the public comments submitted to the County have suggested that the OWMP is inadequate because it fails to designate lands within the Highway 50 corridor

¹ Saving, S.C. and Greenwood, G.B. 2002. The Potential Impacts of Development on Wildlands in El Dorado County, California. Saving and Greenwood assessed the effects of habitat loss and fragmentation based on the land use designations and policies of the 1996 General Plan which is no longer in effect. The 1996 General Plan policies provided that impacts to oak woodlands would be mitigated by retention of a minimum amount of tree canopy onsite or replacement of tree canopy removed. These policies were replaced in the 2004 General Plan with Policy 7.4.4.4 which requires retention and replacement of tree canopy or preservation of oak woodlands at a 2:1 ratio.

as Priority Conservation Areas, or because the OWMP fails to maintain a connection or corridor of oak woodlands across Highway 50. We believe the authors of those letters misunderstand or misconstrue the General Plan and the purpose of the OWMP.

Despite the physical limitations discussed above, the General Plan designates "Important Biological Corridors" (-IBCs) intended to, among other things, preserve and protect opportunities for wildlife movement across Highway 50. The -IBCs are substantially similar to areas identified in the Saving and Greenwood study referenced above, including designation of the Weber Creek canyon across Highway 50. The -IBCs are discussed in General Plan Policy 7.4.2.9, and the related Implementation Measure CO-N addresses a process to review and update the Important Biological Corridor (-IBC) overlay.

At a hearing on July 10, 2007, the Board directed that development of the INRMP will include a review and update of the -IBCs as contemplated in Measure CO-N. This process will involve an assessment of the opportunities to provide or maintain wildlife crossings under Highway 50. Additionally, as the name implies, the INRMP is an integrated plan, requiring consideration of more than simply connectivity between oak woodland habitats. Instead, the INRMP contemplates that a mosaic of various habitat types would be interconnected, where aquatic environments transition to wetland and riparian habitats which in turn are bordered by oak woodlands, or at higher elevations, conifer habitats. A mosaic of a variety of habitat types would generally be expected to support a broader range of species.

Perhaps most importantly, the comments concerning this issue seem to fundamentally misunderstand the purpose of the program. While the OWMP does not specifically direct the expenditure of conservation funds into the Highway 50 corridor, this should not be interpreted to mean that all of the oak woodlands within the area will be lost to development. Development activity along the highway has been ongoing for many years. Despite this development activity, and the ineffectiveness of prior General Plan policies related to the protection of oak woodlands, substantial areas of oak woodlands remain intact. This is evidenced by a comparison of the oak woodland inventory and mapping generated for the OWMP and the map of "Existing Developed Parcels" (EIR Exhibit 5.12-3).

V. The OWMP and other General Plan policies provide for connectivity between PCAs.

Some comment letters addressed to the County have suggested that the OWMP fails to provide for adequate connections between areas designated as PCAs. Again, this is simply untrue.

The PCAs, as previously described, represent large expanses of oak woodlands within areas that are presently not fragmented, and are unlikely to become fragmented through implementation of the General Plan. This approach is considered by the Board of Supervisors to be environmentally superior to alternatives that might otherwise direct conservation efforts into areas that are planned for development.

Throughout development of the OWMP, the County has recognized that lands in public ownership as well as private lands subject to certain types of regulatory constraints provide protection of natural resource values. Regulatory constraints include, for example, conservation easements dedicated to private land trusts, wetland or riparian setbacks, the County's -IBC and -EP overlay designations, Agricultural Districts with actively managed landscapes, slopes in excess of 30%, as well as Open Space and Natural Resource land use designations. From the earliest stages of the inventory and mapping process (Joint Agricultural Commission/Planning Commission Hearing, November 11, 2006) through ultimate identification of the PCAs, these other lands and their contribution to the resource values of the conservation areas have been an integral element of the analysis.

As designated, the PCAs are generally located adjacent to existing protected lands, either in state ownership, federal ownership or subject to private conservation easements, or land subject to other regulatory constraints. These other lands, including more than 70,000 acres within the -IBC overlay, provide substantial connectivity between the PCAs. Figure 2 of the OWMP specifically demonstrates the other lands and corridors that connect and enhance the value of the PCA's.

VI. The Negative Declaration does not identify any significant or potentially significant environmental impacts; an EIR is not required.

The General Plan EIR comprehensively analyzed impacts to biological resources, including loss and fragmentation of wildlife habitat, impacts on special status species, impacts on wildlife movement, and removal, degradation and fragmentation of sensitive

habitats. A series of mitigation measures were identified in the General Plan EIR to address impacts to biological resources. These mitigation measures have been incorporated into the General Plan as policies. The OWMP is, in fact, simply the implementation of certain of the mitigation measures identified in the EIR and incorporated into the General Plan.

The OWMP is a plan for the conservation of oak woodlands in El Dorado County. It is implemented in a manner consistent with the intent and purpose of the policies contained in the General Plan. Some commenters have suggested that a new EIR is needed to analyze effects that are essentially related to future development projects rather than the OWMP. The Initial Study/Negative Declaration ("IS/ND") correctly identifies that implementation of the OWMP will have either "no impact" or "less than significant impacts" on the environment. Accordingly, the Negative Declaration is adequate.

Several letters suggest that the ND is inadequate and an EIR is required because the OWMP will be "less effective" at mitigating the significant effects identified in the General Plan EIR. Generally, these assertions are based on the use of "canopy cover" as the unit of measurement, and the failure to designate PCAs within the Highway 50 corridor. We believe that these authors misunderstand the analysis in the General Plan EIR.

As discussed in Section I, above, the plain language of the General Plan provides for the use of canopy as the unit of measurement to define which lands are subject to the requirements of Policy 7.4.4.4, as well as to quantify impacts and determine which of the mitigation options apply. The OWMP uses "oak canopy" as the objective unit of measurement, but protects "oak woodlands" by onsite retention, and acquisition of large contiguous blocks of unfragmented woodlands within the PCAs.

The suggestion that the OWMP is deficient because it fails to designate PCAs within the Highway 50 corridor appears to misunderstand the nature of the analysis in the General Plan EIR. The EIR included an exhaustive assessment of impacts to biological resources, including habitat fragmentation, for each of the equal weight alternatives. The Board of Supervisors considered and rejected alternatives, including the Environmentally Constrained Alternative, that would have reduced the severity of impacts, although not to below a level of significance. Instead, the Board of Supervisors included the -IBC overlay in the 2004 General Plan as a mitigation measure to address the issue of habitat fragmentation and connectivity across Highway 50. It is important to note that the -IBC overlay is a regulatory constraint, not a preserve system or land acquisition program.

VII. The OWMP is a component of the future INRMP, but the OWMP has independent utility as a conservation plan and mitigation program.

As discussed in Section I above, the General Plan EIR identified a series of mitigation measures that were incorporated into the General Plan as Policies and Implementation Measures. Policy 7.4.4.4 and Implementation Measure CO-P provide for mitigation for impacts to oaks and oak woodlands and provide for the adoption of an Oak Resources Management Plan. The Board of Supervisors has expanded the scope of the Oak Resources Management Plan to incorporate the basic elements of the INRMP as they relate to oak woodlands. This plan is now identified as the Oak Woodland Management Plan.

Implementation Measure CO-P anticipates the OWMP will be prepared within two years of General Plan adoption and will address, among other things, the mitigation standards outlined in Policy 7.4.4.4, thresholds of significance for loss of oak woodlands, requirements for tree surveys and tree replanting standards. Heritage and landmark tree protection standards and the provisions of Policy 7.4.5.1 will be addressed by the County in a separate ordinance.

Public Resource Code (PRC) Section 21083.4 requires a county to determine, as part of its CEQA review, whether a project may result in conversion of oak woodlands that will have a significant effect on the environment. If the county determines that the project may have a significant effect, the county must require one or more of four mitigation alternatives, including conservation of oak woodlands, replacement plantings, contribution to the statewide Oak Woodlands Conservation Fund, or other mitigation measures developed by the county. PRC Section 21083.4 further provides that "a lead agency that adopts, and a project that incorporates, one or more of the measures specified in this section to mitigate the significant effects to oaks and oak woodlands shall be deemed to be in compliance with this division only as it applies to effects on oaks and oak woodlands". The OWMP will assist the County in its evaluation of projects and mitigation of significant effects in compliance with CEQA.

Finally, the OWMP meets the requirements of an Oak Woodland Management Plan prepared pursuant to the Oak Woodlands Conservation Act (Fish & Game Code Section 1360, et. seq.). Designed to encourage voluntary conservation of oak resources in the state, the Oak Woodlands Conservation Act provides grant funding for long-term conservation of oak resources. Completion of the OWMP will enable the County, alone or through partnering opportunities with public agencies, conservation organizations and land trusts, and other entities, to apply for grant funding to acquire lands for oak

woodland conservation. The OWMP provides for the opportunity to utilize grant funding in areas designated as "sensitive" and in areas with a high risk of habitat fragmentation.

VIII. Conclusion

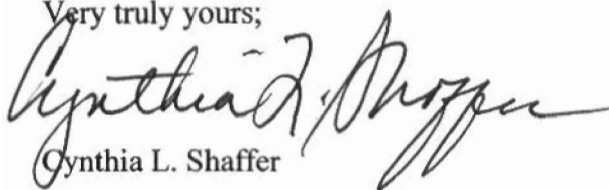
The OWMP is consistent with the requirements of the General Plan. The OWMP is a conservation and mitigation assistance program identified in the General Plan EIR and does not result in any significant environmental effects. The OWMP does not amend or otherwise modify the General Plan and does not add new environmental impacts or increase the severity of previously identified impacts associated with the General Plan implementation.

The OWMP satisfies the requirements of Policy 7.4.4.4 and the essential elements of Policy 7.4.2.8, but also has independent utility as a conservation program. The PCAs, as identified, are consistent with the conservation objectives of the General Plan, and preserve oak woodlands of equal or greater biological value. The IS/ND is adequate and the appropriate level of environmental review for the OWMP.

Finally, the OWMP incorporates one or more of the measures specified in PR Section 21083.4 to mitigate the significant effects to oaks and oak woodlands and is, therefore, in compliance with CEQA as it applies to the mitigation of effects on oaks and oak woodlands.

Accordingly, we respectfully request that the Board of Supervisors adopt the Negative Declaration, adopt the Oak Woodland Management Plan, and adopt the Oak Woodland Management Plan Implementing Ordinance, including the Oak Woodlands Conservation Fee.

Very truly yours;



Cynthia L. Shaffer

CLS/rlk