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BOS 2-23-15

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BOS Meeting, Feb 23, 2015 - Comments on Dudek's Memo, Attachment 11B

2 messages

Roger Lewis <re.lewis@comcast.net>

Thu, Feb 19, 2015 at 4:23 PM

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Dear Supervisor Veerkamp,

We appreciate the effort that Dudek has put forth in presenting their analysis of Decision Points 4 through 7 to facilitate the Board's discussion this coming Feb 23. However, we have some concerns about Decision Points 4 and 6.

Decision Point 4 – Oak Mitigation Approach

Although we have no objections in principal to the approach, we find it very confusing and difficult to interpret and presume that other property developers would come to the same conclusion. To alleviate our concern, we suggest that County staff/Dudek explain at the Feb 23 meeting how the proposed retention standards and mitigation ratios might apply to a real project. We attach for their use the plan of our project onto which we should like to see superimposed the area representing oak woodlands, the areas of impact, and the required mitigation ratios.

Decision Point 6 – Priority Conservation Area Update

With regard to PCA's, Dudek seems to imply that the size of the required conservation area should be based on the anticipated impact of developing the entire potentially developable acreage in the County, i.e. "As presented in Table 5, up to 87,820 acres of oak woodland may be impacted under the General Plan Planning Horizon development scenario". And they then state, "... PCAs and IBCs encompass 84,110 acres of oak woodland that may be available for conservation to mitigate impacts to oak woodlands resulting from implementation of the General Plan. They conclude therefore that there is a potential shortfall of conservation area, and if mitigation requires a 2:1 ratio, the shortfall is much greater. We do not understand the logic behind this assumption because, by the County's own report (EL Dorado County, Economic and Demographic Profile, 2010-2011), development in the County increases at only about 500 acres/year, and of this amount of development, non-exempt woodlands requiring offsite mitigation are estimated to be considerably less than 100 acres/year. Moreover, the requirements for PCA's seem to ignore the effect of natural regeneration, if any, of the 257,789 acres of oak woodlands that Dudek, in Table 5, identifies as being the total acreage of oak woodlands in the County.

We respectfully request that the County explain the above apparent anomalies and quantify the actual expected annual impact of future developments on the oak woodlands. In summary we ask:

1. What is the calculated annual impact of future developments on the oak woodlands?

2. How does the calculated impact compare to the 87,820 acres of impact presumed in Table 5?
3. Why has natural regeneration of existing oak resources not been considered as a source of mitigation?

Thank you,

Roger Lewis

El Dorado Sr. Housing, LLC.



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Roger Lewis <re.lewis@comcast.net>

Thu, Feb 19, 2015 at 4:28 PM

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