

March 10, 2008

Susan Durham
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IS/ND

Oak Woodland Management Plan
Initial Study/Negative Declaration Comments
Attn: Monique Wilber
2850 Fairlane Court
Placerville, CA 95667
E-mail: monique.wilber@edcgov.us

Subject: Oak Woodland Management Plan Initial Study/Negative Declaration

With this e-mail, I submit comments on the Oak Woodland Management Plan Initial Study/Negative Declaration (OWMP IS/ND) prepared by El Dorado County (County). In general, I am concerned that the Oak Woodland Management Plan (Plan) would not fulfill the intent of County General Plan policies. It still remains unclear that implementation of the Plan would meet its stated goals. Previous comments are attached in the Appendix and are incorporated into this comment letter by this reference.

My educational background includes a bachelor's degree in zoology from the University of California, Berkeley and postbaccalaureate course work in natural resources (including but not limited to botany, ecology, and wildlife biology) at Humboldt State University. I left school for full-time federal employment as an ecologist (vegetation ecology). Over 12 years of experience in federal and private consulting work were primarily in vegetation ecology and botany (much of that work in El Dorado County); additional public sector work included water quality monitoring. Through the years, I have continued my education with trainings and attendance at events, such as the 2007 Oak Woodland Symposium, as well as reviewing oak woodland literature for work.

The County has failed to address a major flaw in their Oak Woodland Management Plan (Plan). Namely, the Plan is not an oak **woodland** management plan but rather an oak tree plan. The Plan does not fulfill the intent of the General Plan to mitigate loss and fragmentation of oak woodland in the County. Mitigation as proposed by the County would mitigate only oak trees within oak woodlands and, thereby, degrade and potentially eliminate the biological and ecosystem functions of oak woodland. In addition, by calculating the area to be mitigated by only a percentage of the true oak woodland and by valuing that oak woodland below current land values, the County would never be able to fully mitigate removed oak woodland under Mitigation Option B. The areas where mitigation fees would be directed to conserve existing oak woodland are isolated and do not maintain connectivity (especially along the Highway 50 corridor), thereby reducing the value of the oak woodland functions. These are substantial changes from the direction and intent of the General Plan and will result in significantly more severe adverse effects on oak woodlands than disclosed in the General Plan EIR.

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Comments to specific statements within the Plan follow:

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Mitigation Option A is not “Oak Woodland On-Site Retention and Replacement.” Only oak canopy within the oak woodland is mitigated and, therefore, the mitigation using the County’s calculation would greatly underestimate the area requiring mitigation.

Mitigation Option B is not an “Oak Woodland Conservation Fund and In-Lieu Fee.” Again, the area mitigated is based only on oak canopy, which greatly underestimates the actual area of oak woodland needed to replace what is removed. Habitat loss and fragmentation would be based on a ratio much lower than the required 2:1.

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The Priority Conservation Areas (PCAs) as drawn do not “best preserve the integrity of the oak woodland ecosystem.” The PCAs are isolated with a great gap between the north and south areas and maintain no connectivity among oak woodlands. Oak woodland connectivity for the sake of oak woodland ecosystems needs to be addressed in the Oak Woodland Management Plan. Connectivity of oak woodlands is not preserved by riparian corridors, which mostly do not support oak woodland, and not necessarily by wildlife corridors, which may or may not consist of oak woodland. It is telling that the original mapping of PCAs, which the consultant team based on oak woodland science, covered a much greater area with greater connectivity than the County proposes now.

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Connectivity of oak woodlands is a concept that is not tied to wildlife habitat and wildlife corridors. Connectivity of oak woodlands is important for oak woodland ecosystems independent of wildlife and need, therefore, to be addressed in the Plan.

The Important Biological Corridor (IBC) layer is not based on science but was drawn in one night by a planner. The areas have not yet been redrawn to reflect biological relevance. Presenting the use of the IBC layer as an element adding value to oak woodland connectivity let alone to wildlife corridors has not been validated.

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Under Regulatory Setting, both the Oak Woodlands Conservation Act of 2001 and Senate Bill 1334 (Public Resources Code 21083.4) are referenced. Both pieces of legislation were passed for the conservation of oak woodlands. The Oak Woodlands Conservation Act of 2001 established the California Oak Woodlands Conservation Program “whose mission is to conserve the integrity and diversity of oak woodlands”. This Plan ignores the integrity of oak woodlands and, by conserving oak trees rather than oak woodland, is not consistent with either piece of legislation.

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Comments under 3.2.1 (a-d) are wrong. The Plan states that “existing oak woodlands in PCAs would be maintained in perpetuity as oak woodland habitat. Therefore, the OWMP would not result in any adverse effects to aesthetics.” With the OWMP, development proceeds. Existing oak woodlands would be removed both outside the PCAs and within the PCAs (unless the County intends to provide removal of oak woodland within the PCAs). As the area within PCAs has been reduced, more oak woodland within the County can be assumed to be available for removal without maintenance of oak woodland refugia. The County has removed a very broad swath along the Highway 50 corridor from PCAs, an area in which the aesthetics would continue to be diminished. Removed oak woodlands would be mitigated at a ratio much less than replacement, resulting in a significant loss of oak woodland. In addition, the County fails to consider the effects from climate changes on oak woodlands and the potential loss of aesthetics if oak woodlands decline or fail to regenerate naturally. The loss of oak woodland under the proposed Plan would result in adverse effects to aesthetics, especially along the Highway 50 corridor.

The statement that “because replanting would likely occur within or adjacent to existing oak woodlands” adverse effects are not expected is not logical. Replantings (even if they succeed) would require many decades, well beyond the lifetime of adults in this County, to provide the same aesthetic value as adjacent mature oak woodland or the oak woodland that would be removed. Adverse effects are significant.

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The adverse effects on valley oak woodland, a sensitive natural community per the General Plan, would be significant, not less than significant. Only 300 acres of the County’s 3400 acres of valley oak woodland are identified within the PCAs. Although adaptive management is proposed by the County, updates of oak woodland losses would occur only annually at best. Given the lag time in making a determination of loss and implementing new policy, valley oak woodland could be lost at significant levels before the loss would be identified. In addition, a comprehensive plan for valley oak woodland should include adjacent, transitional oak woodlands in order to protect environmental conditions necessary for the existence of valley oak woodland.

p.29

A wildlife biologist and hydrologist should have prepared this evaluation. Substantial amounts of oak woodland habitat would be removed or degraded under the Plan. The statement of no impact on the movement of wildlife or fish is not validated by the Plan and supporting documentation. The Plan does not maintain connectivity.

The Plan also does not necessarily preserve oak woodlands that provide water quality benefits. A design for the protection of oak woodlands to maintain water quality was not incorporated into the Plan.

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The Plan conflicts with the El Dorado County General Plan. The Plan has substantial changes from the direction and intent of the General Plan and will result in significantly more severe adverse effects on oak woodlands than disclosed in the General Plan EIR.

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4.0 (a): Overall environmental impacts would be significant. Oak woodland is not being mitigated but rather oak trees within woodlands, resulting in a loss of oak woodland over time. In the long-term, the quality of the environment, fish and wildlife habitat and populations, and communities would be diminished from their current levels. Oak plantings would not be minor and temporary impacts. The replacements, when successful, would require many decades to achieve the ecosystem values of the lost woodland. The Plan does not show that “impacts would be less than significant due to the measures and guidelines in the OWMP.”

4.0 (b): Cumulative impacts to the environment from the Plan activities would generally be adverse as oak woodland habitat would be lost over time from development, agriculture, road construction, failure of replacement plantings, mitigation of oak trees for oak woodland, and changes to vegetation from climate change.

Adaptive management is only engaged after a problem is discovered. Then, assuming the County were willing to affect changes, a lag time would exist before remedies could be resolved upon and implemented, remedies which may or may not be effective. During this time, development and other changes would progress. An adaptive management provision does not guarantee that unanticipated cumulative environmental effects would be identified and rectified.

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p.2

The Plan states that a goal set forth by the OWMP is to mitigate oak canopy removal (i.e., oak tree canopy within a woodland), but the General Plan goal was meant to be mitigation of oak woodland. This Plan is not an oak woodland management plan.

The Plan states that the conservation of Valley Oak Woodland would be emphasized because it is relatively rare in the County and is a sensitive habitat. Only 300 of 3,400 acres are included in PCAs. No method is in place that emphasizes the preservation of valley oak woodland.

p.3

Mitigating oak canopy does not mitigate for oak woodland. The County is not applying a biologically valid definition of oak woodland. Oak woodland can never be mitigated appropriately when the County does not acknowledge what defines oak woodland.

p.7

The term “canopy surface area ratio” is meaningless. To mitigate for oak woodland, the original method of determining oak woodland canopy needs to be returned to the document. The entire land area of oak woodland being removed must be measured. This area includes all species that are part of the oak woodland community as well as gaps within the oak woodland.

p.7

Under Mitigation Option A, the word “woodland” has been eliminated consistently from “oak woodland canopy” to leave “oak canopy.” This omission is telling that the County’s intent is not to mitigate oak woodland as required in the General Plan.

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The term “canopy surface area ratio” is meaningless and has nothing to do with surface area. On-site mitigation needs to be at a 1:1 oak woodland ratio.

Off-site mitigation is meant to be at a 2:1 ratio of oak woodland to be consistent with the General Plan. Changing a 2:1 oak woodland canopy ratio with a 1:1 canopy surface area ratio does not comply with the General Plan.

p. 9

When mitigating for oak woodland, an oak woodland conservation easement, notice of restriction, or other recorded covenant is necessary. An oak tree conservation easement does not protect oak woodland and does not comply with the General Plan.

p.13

If the County intends to mitigate valley oak woodland for valley oak woodland, it must place more than 300 acres in PCAs. Waiting for an annual review potentially would lead to more than 300 acres being lost long before the shortfall is identified. Once the shortfall were identified, the remedy would have to be decided upon and then implementation, potentially leading to even more loss without mitigation.

Thank you for the opportunity to comment on the Oak Woodland Management Plan Initial Study/Negative Declaration. If you would like to discuss any of my comments, please contact me at durhamsus@yahoo.com.

Sincerely,

/s/ Susan Durham

Susan Durham

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Appendix

to

Comments on El Dorado County's
Oak Woodland Management Plan Initial Study and Negative Declaration

Draft Oak Woodland Management Plan Comments

dated December 13, 2007

December 13, 2007

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Susan Durham
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Draft Oak Woodland Management Plan Comments

Attn: Monique Wilber
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Subject: Revised Public Review Draft of the El Dorado County Oak Woodland Management Plan

To Whom It May Concern:

With this e-mail, I submit comments on the Revised Public Review Draft of the El Dorado County Oak Woodland Management Plan (Draft OWMP). In general, I am supportive of the General Plan policies addressing oak woodlands; however, I am concerned that the Draft OWMP would not fulfill the intent of these policies. In addition, it is unclear that implementation of the Draft OWMP would meet its stated goals.

The following comments are ordered to follow the structure of the Draft OWMP and do not reflect their relative importance:

Section 1.B., Goals and Objectives of Plan

Comments regarding goals are deferred to other sections when applicable.

- The Draft OWMP does not indicate how the relative acreages of all five oak woodland CWHR types would be maintained. Sections 8 (Monitoring and Reporting) and 9 (Administration of Oak Woodland Conservation Plan) in Appendix A provide no instruction for maintaining relative acreages. I encourage the County to include in this goal that the type of oak woodland being removed would be mitigated with the same type oak woodland. This is particularly important since blue oak woodland and blue oak-foothill pine types are found predominantly in the lower elevations where development pressures are most intense, have already been heavily developed along the Highway 50 corridor, and have low acreages relative to the montane hardwood type.
- The conservation of valley oak woodland, which is designated a sensitive habitat in the General Plan EIR, is not emphasized in the Draft OWMP as the goal states. Comparison of Tables 4-1 and 4-4 shows that about 1% of oak woodland in the planning area is valley oak woodland but less than 10% of the existing valley oak woodland is included in the PCAs. Valley oak woodland is underrepresented in the defined PCAs. All valley oak woodland should be included in the PCAs and should

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receive high priority for mitigation. (Note: Because valley oak woodland occurs in alluvial soils that may be found outside stream zones, valley oak woodland would not necessarily be protected by stream buffers.)

Section 2.A., Applicability and Exemptions

I encourage retention of the following language from the Draft OWMP: 1) "...oak tree removal in the 100 foot defensible space zone, and fuel modification actions pursuant to a County approved Fire Safe Plan, inside and outside of the 100 foot defensible space zone for all new development projects, is not exempt from Policy 7.4.4.4 mitigation" and 2) "...specimens of oak trees and native habitat can be retained in the 100 foot defensible space by keeping lower branches of oak trees pruned, removing surface litter, separating trees and shrubs (horizontally), and reducing ladder fuels (vertically separating trees and shrubs)." Although habitat values would be reduced, some value would remain.

Section 2.B., Replacement Objectives

Regarding Policy 7.4.4.4 Option A, placing existing oak woodlands (of greater or equal biological value to those being removed) under conservation easements or deed restrictions at a 2:1 land area ratio would be a positive alternative to onsite replacement plantings.

Section 2.C., Mitigation Option A

The wording in General Plan Policy 7.4.4.4 Option A has been changed from "oak woodland habitat" to "oak woodland canopy" in the Draft OWMP. This change is significant and would lead to a conflict with the intent of the policy.

The terms "oak woodland" and "oak canopy" are not interchangeable as stated in the Draft OWMP nor are the terms "oak woodland habitat" and "oak woodland canopy" interchangeable. The Draft OWMP uses five California Wildlife Habitat Relationship (CWHR) types to identify oak woodlands. These CWHR types represent habitat types that are composed of a variety of species as shown in the table below (table derived from CWHR descriptions, California Department of Fish and Game). Oak woodland is defined by a community of species that includes trees, shrubs, forbs, and grasses (as well as the gaps among trees, snags, and logs) and the animals that use the habitat. Oak canopy as used in the Draft OWMP is not equivalent to oak woodland. Oak canopy is a tree-based measure and not a vegetation type or a representation of a community.

The Draft OWMP per this section requires mitigation for "oak woodland canopy" impacted. Oak woodland canopy, as used by the Board of Supervisors during their meeting of September 25, 2007, represents only that percent of a given land area occurring under the canopy of individual oak trees (i.e., sum of the area contained within each individual oak tree's dripline). That is not equivalent to the area of oak woodland impacted. If "oak canopy" or "oak woodland canopy" is used to determine the area of oak woodland that is impacted, only a fraction of the area of impacted oak woodland would be mitigated. The area of oak woodland that needs to be mitigated is the entire land area impacted within oak woodland.

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Table 1. Partial List of Tree and Shrub Species by CWHR Oak Woodland Type
 (information from http://www.dfg.ca.gov/biogeodata/cwhr/wildlife_habitats.asp#Tree)

Blue Oak Woodland	Blue Oak-Foothill Pine	Valley Oak Woodland	Montane Hardwood	Montane Hardwood-Conifer
Trees Blue oak Interior live oak Valley oak	Blue oak Foothill pine Interior live oak California buckeye	Valley oak Interior live oak Blue oak Box elder	Canyon live oak Black oak Douglas-fir Foothill pine Knobcone pine Tanoak Pacific madrone California bay	Black oak Bigleaf maple White alder Dogwood Douglas-fir Incense-cedar Ponderosa pine Tanoak
Shrubs Poison-oak Hoary coffeeberry Buckbrush Redberry California buckeye Manzanita	<i>Ceanothus</i> sp. Whiteleaf manzanita Redberry Hoary coffeeberry Poison-oak Silver lupine Blue elderberry Calif. Yerba santa California redbud	Poison-oak Blue elderberry Calif. wild grape Toyon Hoary coffeeberry California buckeye	Oregon grape Currant Wood rose Snowberry Manzanita Poison-oak	

Section 2.D., On-Site Mitigation – Replanting and Replacement

The first bulleted item states:

“Replacement plantings may be accepted if adequate openings exist onsite and the replanting area likely would support oak woodland (e.g., soil type and general environment). The intent is not to remove existing natural habitats for plantings or to create a continuous canopy that would reduce wildlife value or contribute to increased fire hazard. Replacement plantings shall meet the County’s replanting and replacement standards and is subject to County approval.”

The General Plan EIR referenced the Harris and Kocher (2002) study that raised concerns about the effectiveness of replacement plantings to mitigate oak tree impacts (e.g., planting in existing oak woodland or on unsuitable sites such as cut-and-fill slopes). Openings within oak woodlands are a natural component of the ecosystem and provide a diversity of habitat values. Replacement plantings within natural openings in existing oak woodland would not replace oak woodland that is removed but would reduce the overall value of the existing oak woodland. An option of contributing to the conservation fund would be preferred to forcing plantings where the intent of replacing oak woodland could not be fulfilled. Having observed proposed plans with inappropriate replacement plantings, I encourage the County to establish clear standards to assist consultants,

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planners, and landowners in avoiding degradation of existing oak woodland habitat with replacement plantings.

Section 2.E., Mitigation Option B

Please refer to the related comment under Section 2.C. (Mitigation Option A). The Draft OWMP changes the wording in General Plan Policy 7.4.4.4 Option B from “oak woodland habitat” to “oak woodland canopy”, which is a significant change. Policy 7.4.4.4 Option B states that:

“The project applicant shall provide sufficient funding to the County's INRMP conservation fund, described in Policy 7.4.2.8, **to fully compensate for the impact to oak woodland habitat** [emphasis added]. To compensate for fragmentation as well as habitat loss, **the preservation mitigation ratio shall be 2:1 and based on the total woodland acreage onsite directly impacted by habitat loss and indirectly impacted by habitat fragmentation** [emphasis added].”

Policy 7.4.4.4 Option B clearly intends mitigation to compensate for removal of oak woodland habitat and not “oak canopy” or “oak woodland canopy”. Oak woodland habitat as described under the comments to Section 2.C. includes a complex of plant and animal species as well as other habitat components such as snags, logs, and natural openings. Implementation of the Draft OWMP would not be consistent with Policy 7.4.4.4 unless the entire acreage of impacted oak woodland is mitigated at a 2:1 ratio based on the total woodland acreage.

Section 2.F., Mitigation Program Flexibility

This section of the Draft OWMP is the only place that mentions the need to mitigate impacted oak woodland with oak woodland of equal or greater biological value; however, no criteria for determining equal or greater biological value are provided.

Oak Woodland of Equal or Greater Biological Value

Supporting documents for the General Plan EIR state that oak woodlands used for mitigation shall be of equal or greater value to those that are impacted. Oak woodlands that are placed under conservation easements or deeds of restriction, or that are purchased by fee title, must be of equal or greater biological value to those oak woodlands being impacted. This concept is so important that it should be included as one of the goals at the beginning of the Draft OWMP.

The Draft OWMP presents no method for making a determination regarding biological value. This determination is important to evaluating how well the Draft OWMP addresses mitigation and should be available for public comment before being adopted.

Yolo County's Oak Woodland Conservation and Enhancement Plan includes an oak woodland checklist that could be adapted for El Dorado County. The checklist addresses

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critical biological and environmental elements such as stand composition, integrity, and functionality (e.g., stand structure), and landscape function (contribution to flood protection and water quality protection) as well as human interactions (e.g., buffering between incompatible uses). This checklist could be adapted for use in determining the biological value of oak woodland stands that are being impacted and those that are being used as mitigation.

Section 3, Conservation Fund In-Lieu Fee Methodology

The total cost/fee per acre is too low and would not provide sufficient funding to fully compensate for the impact to oak woodland habitat. The cost was based on properties with low values. Properties where the risk from fragmentation and the need for preservation is greatest were not included in the fee calculations. Also, conservation easements were undervalued and may cost as much as 80% of the property value. The American River Conservancy or other groups likely would provide the County with information on the cost of recently acquired conservation easements.

The cost of implementing a program cannot be determined until the administration of the program is established. Section 9 (Administration of Oak Woodland Conservation Program) of Appendix A does not contain information to explain how the program would be administered. Without this information, the cost of administration cannot be calculated.

Section 4.A., Identification of Priority Conservation Areas

Fragmentation was a major concern in the Saving and Greenwood study (2002) and the General Plan EIR. As acknowledged in Appendix A of the Draft OWMP:

“The Saving and Greenwood study identified the need to maintain large contiguous areas of oak woodland that function under a more natural state. The study also emphasized the need for a program that focuses on critical areas of connectivity such as habitat corridors. The EIR (EDAW, 2003) discussed the importance of preserving connectivity in the form of riparian corridors, canyon bottoms, and ridgelines and also by maintaining a landscape that contains a network of multiple pathways for wildlife movement.”

Early mapping of PCAs by the consultant tried to address concerns regarding fragmentation. As the County directed that Community Regions, Rural Centers, Commercial and Industrial lands, and Low Density Residential lands be removed from PCAs, the PCAs were reduced in size and became increasingly isolated. The northern and southern portions of the PCAs have no connectivity. Potential areas for connecting PCAs (e.g., Slate Creek to Indian Creek) as discussed in Appendix A and General Plan supporting documents have been abandoned (Note: Connectivity incorporates broader concepts than wildlife corridors and cannot be left until a time when there may be an Integrated Natural Resource Management Plan.) Fragmentation cannot be reduced and connectivity provided without including Community Regions, Rural Centers, and Low Density Residential lands in the PCAs.

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I strongly disagree with the contention that “The OWMP establishes an oak woodlands resource base that, when managed for conservation and preservation purposes, conserves a substantial portion of oak woodland habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the county.” I do agree that the Draft OWMP focuses “conservation easement acquisition efforts within areas not currently fragmented and which are unlikely to become fragmented through implementation of the General Plan”. However, this very statement is telling of the problems with the Draft OWMP. Mitigating the removal of oak woodland habitat would not occur where the mitigation is needed (i.e., where the loss is occurring). The Draft OWMP would exacerbate fragmentation of oak woodlands and avoid addressing issues raised in the General Plan EIR.

“Subsequent adoption and implementation of the INRMP” would not ensure connectivity between PCAs if the connecting lands are already removed or fragmented. As stated in Appendix A, the “General Plan EIR (EDAW, 2003) discussed the importance of preserving connectivity in the form of riparian corridors, canyon bottoms, and ridgelines and also by maintaining a landscape that contains a network of multiple pathways for wildlife movement.” No evidence indicates that existing public lands, Important Biological Corridors (IBC), and stream setback requirements fulfill the connectivity need addressed in the EIR. The County has not reviewed and updated the IBC overlay land use designation as required under Measure CO-N. Although stream setbacks may provide some wildlife movement, they do not provide connectivity in the form of ridgelines and canyon bottoms, nor do they provide the connectivity for upland vegetation types such as oak woodlands.

Section 4.B., Management of PCAs

I encourage the County to flesh out the management and administration of PCAs and other mitigation sites and make the material available for public review.

Section 4.C., Conservation Easements

Granting conservation easements for oak woodlands to the County in perpetuity is critical to ensuring the conservation of oak woodlands and is commended.

Important Oak Woodland Habitat

The Draft OWMP fails to address important oak woodland habitat. As the County’s consultants initially attempted, important oak woodland habitat should be identified at this first phase of the Integrated Natural Resource Management Plan. Under the response to comments to the General Plan EIR, mitigation measures (i.e., Measure CO-U) “would require development projects to avoid or, where avoidance is not feasible, to fully mitigate impacts to any oak woodland habitat designated as “important habitat” under the INRMP. Mitigation would include replacement/preservation at a 2:1 ratio, (with an additional requirement of 1:1 onsite replacement/preservation for sites greater than 10 acres). Clearly, the intent was that some oak woodland habitat would be designated as

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“important habitat”. The OWMP is the appropriate medium for designating important oak woodland habitat.

Opportunity to Fulfill Other General Plan Objectives and Goals

Development of an oak woodland management plan is an excellent opportunity to achieve multiple goals and objectives of the General Plan. For example, conservation of oak woodlands is consistent with General Plan Goal 7.6 (Open Space Conservation):

“Conserve open space land for the continuation of the County’s rural character, commercial agriculture, forestry and other productive uses, the enjoyment of scenic beauty and recreation, the protection of natural resources, for protection from natural hazards, and for wildlife habitat.”

Open space is most valuable where human populations are concentrated (e.g., the Highway 50 corridor). These areas are also where oak woodland is most at risk from fragmentation and where mitigation funds should be directed first.

Thank you for the opportunity to comment on the Draft OWMP. If you would like to discuss any of my comments, please contact me at durhamsus@yahoo.com.

Sincerely,

/s/ Susan Durham

Susan Durham

/sd