

## INRMP Work Program July 14, 2008

### Task 1. Initial Inventory Mapping - completed and map adopted by the Board of Supervisors on April 1, 2008.

General Plan Policy 7.4.2.8 states that the habitat inventory will map the following important habitats in El Dorado County: 1) Habitats that support special status species; 2) Aquatic environments including streams, rivers, and lakes; 3) Wetland and riparian habitat; 4) Important habitat for migratory deer herds; and 5) Large expanses of native vegetation. The Board directed County staff to prepare an initial inventory map which they adopted on April 1, 2008.

Comments: There has been continuing confusion regarding the meaning of “important habitat”. As this task correctly points out, Policy 7.4.2.8 (A) requires the INRMP to inventory and map the five identified “important habitats”. During the OWMP process there was concern that all mapped PCAs or “large expanses of native vegetation” if termed “important habitat” would be subject to Policy 7.4.1.6 and Measure CO-U “no net loss policy”. County counsel noted and the BOS concurred that “no net loss” for oak woodlands applied only to those PCAs supporting special status species. That is why the following legend was included in the adopted OWMP:

This map displays initial oak woodland habitat where willing landowners could be approached to negotiate General Plan Policy 7.4.4.4 mitigation and other types of oak woodland conservation land acquisition. Identification of oak woodland habitat as priority on this map does not trigger or mandate Policy 7.4.1.6 or Measure CO-U requirements for Policy 7.4.4.4 Option A or Option B unless the oak woodland habitat is within (but not adjacent to) any lands that are already identified as containing threatened, rare, or endangered species.

In other words, although all of the five identified and mapped habitats are “important habitat”, no-net loss only applies to those important habitats that support special status species.

“Habitats that support special status species” was mapped using CNDDDB data for special status species known occurrences, California red legged frog Recovery Plan area, Pine Hill ecological preserve boundary, Pine Hill Preserve boundaries, and Pine Hill Recovery Plan area. Habitats that support special status species were not mapped.

Comments: Statement that County has not mapped habitat that supports special status species is confusing. The CNDDDB maps all positive sightings or Special Status Species occurrences for those species in the County that CNDDDB reports. There is no requirement in the INRMP to map or identify potential special status species habitat. Lands with potential SSS habitat issues would need to be studied on a project specific basis. If habitat is identified as supporting special status species there needs to be a mechanism whereby that identification becomes part of the inventory and mapping.

In addition, there is some confusion about the role of the INRMP with regards to special status species habitat. Unlike an HCP/NCCP there is no take authority granted through the INRMP. It is not intended that the INRMP serve as a mitigation bank to allow takes of special status

species habitat. However, the INRMP may serve as an integral part of a project specific analysis. With or without the INRMP a project may not take special status species habitat unless in compliance with applicable federal and state regulations. In accordance with the OWMP legend, any important habitat that supports a special status species must be preserved with “no-net loss” unless mitigated per federal or state regulations.

### **Task 3. Identification/Refining of “Important Habitats”**

The initial mapping effort provided a preliminary identification of habitat that could be deemed “important.” CONSULTANT will work with local, state, and federal agencies as directed in General Plan Policy 7.4.2.8, and with County staff to further identify and refine “Important Habitats.”

Comments: Regarding selection of “important habitats”, the GP EIR states that the 5 identified “important habitats” were selected using federal and state criteria and the county has the *option* to add additional important habitats as expressed in the FEIR response to the California Department of Fish and Game:

**Response to Comment 253-48 (FEIR):** State and federal statutory requirements protecting biological resources were considered when developing the list of important habitat listed on page 5.12-56 under Mitigation Measure 5.12-1(d). (i.e. 7.4.2.8 (a) (1) – (5) (deer, sss, riparian, aquatic, large expanses) The determination of the presence of important habitat will be consistent with these requirements. In addition, the County has the option of expanding the definition of important habitats beyond those listed on page 5.12-56.

Policy 7.4.2.8 (a)(1)-(5) defines the five habitats and states that Pawtac, CDFG and USFWS shall assist in the inventorying and mapping of the important habitats.

If this list of 5 important habitats is to be expanded then Policy 7.4.1.6 states:

The County Agricultural Commission, Plant and Wildlife Technical Advisory Committee (Pawtac), representatives of the agricultural community, academia, and other stakeholders shall be involved and consulted in defining the important habitats of the County and in the creation and implementation of the INRMP.

Conclusion: The GP identifies 5 important habitats which will be inventoried and mapped with the assistance of PAWTAC, CDFG and USFWS. At the option of the County, additional important habitats will be identified with consultation of Stakeholders, Academia and Pawtac. The consultant should do the work as directed and produce the work product which will be released to staff, Pawtac and the stakeholders for review.

### **Subtask 3.2 Inventory and Map Protected Lands**

To prepare for developing a Habitat Protection Strategy, County staff will review the regulatory environment as applicable to Important Habitat and define existing regulatory constraints and map existing “Protected Lands,” utilizing existing data.

#### **3.2.1 Publicly owned property or land otherwise undevelopable due to conservation easements or similar constraints**

This section of the “Protected Lands” map shall illustrate lands which are publicly

owned, lands which are undevelopable due to conservation easements, lands federally or state designated as critical habitat, or similar type constraints.

### **3.2.2 Property with land use designation, overlay, or other local regulatory constraints**

This section of the “Protected Lands” map shall illustrate lands whose standards, while protective, could change at some point in time. These could include Natural Resources or Open Space land use designations, ecological preserve overlays, 30% or greater slopes, riparian and wetland setbacks, etc.

*Comments:* This task is consistent with the attached flow chart. As noted at the last BOS meeting, 30% slopes should be changed to 40%. This is consistent with the EIR analysis at 40% (Saving-Greenwood) as well as Policy 2.3.2.1 which states disturbances above 30% are to be discouraged based on visual impacts. In addition, Policy 7.1.2.1 allows reasonable use of slopes above 30% well as for access.

### **Subtask 3.3 Conduct a study to identify riparian, connective, and critical corridors (Important Biological Corridors/IBCs)\***

General Plan Policy 7.4.2.9 and Implementation Measure CO-N direct that the County will review the IBC overlay which shall apply to lands identified as having high wildlife habitat values because of extent, habitat function, connectivity, and other factors.

This subtask consists of: preparing a land use assessment, to describe projected land use and to assess the potential affects on biological resources; and using that data to conduct a study to identify connective and critical corridors between habitats.

### **3.3.1 Describe Projected Land Use\***

CONSULTANT will review County planning documents and policies (e.g., the General Plan, General Plan EIR, and any specific plans available) and California Department of Forestry and Fire Protection’s Fire and Resource Assessment Program (FRAP) studies and coordinate with the County to identify planned and potential future development, infrastructure improvement and maintenance activities, and other types of planned activities that could affect natural habitat and special-status species. CONSULTANT will use the General Plan Land Use Designations GIS data to summarize the areas of potential future development with habitats identified in the Habitat Inventory. CONSULTANT will prepare a summary description of potential future land use in the Planning Area. This report will include a summary of the purpose, location, and extent of disturbance that could be associated with future land use categories; actions that will be implemented to undertake land use changes that could affect biological resources (i.e., impact mechanisms); and the anticipated schedule for growth and development in the Planning Area. Once identified, CONSULTANT will create a GIS data layer of the projected area of disturbance associated with the projected land use. Water and infrastructure projects proposed by other entities (e.g., El Dorado Irrigation District) would be added to the land use assessment if location information on such projects is provided to CONSULTANT in digital GIS format on a timely basis.

*Comments:* This should be just a compilation and narrative of the GP Land Use Map overlaid with EID and other infrastructure and the initial inventory and mapping of habitats. Otherwise, this information is duplicative of the GP EIR which led to the land use map. This report assumes

“actions will be implemented to undertake land use changes that could affect biological resources.” In fact, the GP accepts biological resources will be affected by the land use map and the INRMP is mitigation for the effects of that land use – not the reason to change the land use .

### **3.3.2 Assess Potential Effects on Biological Resources\***

CONSULTANT will assess the effects of projected land use under the General Plan on special-status species and natural habitats in the Planning Area. Results of the effects assessment will be used to help guide development of habitat protection and mitigation strategies in the INRMP. The assessment will identify the likely direct, indirect, and cumulative effects of projected land use on biological resources. Wildlife Habitat Relationships (WHR) information will be used to assess the potential affects of projected land use on special-status species. CONSULTANT will use existing information in the GP EIR to the greatest extent possible for this effects assessment. This analysis will describe the effects of land use changes on up to 42 fish and wildlife species and up to 19 plant species and the major natural habitat types in the Planning Area. Where there is existing appropriate GIS data, CONSULTANT will quantify the effects, otherwise the analysis will be qualitative and in narrative form.

Comments: This report will assess effect of the GP land use map on Special Status Species and “Natural Lands”. First, habitat for special status species are protected by federal and state regulations. No matter what the land use designation, habitats supporting special status species are protected. Second, “Natural Lands” encompasses all “important habitat” and is not an INRMP term. Finally, read literally, this could require a predictive analysis of the 400,000 or so acres within the INRMP plan area as to how land use affects all “Natural Habitat” and special status species.

Saving-Greenwood exhaustively conducted an assessment of the 1996 land use map on oak woodlands assuming full theoretical build-out within the project area. “The purpose of the study was to evaluate the potential impact of El Dorado County’s General Plan on wildland habitat in the county (primarily oak woodland) and how policy alternatives might mitigate these impacts” They summarized their report as follows: “For El Dorado County, our study concludes that the most effective way to maintain wildland oaks in large contiguous patches would be a land acquisition program focused on those critical areas of connectivity, often referred to as habitat corridors. More importantly, broad-brush, “best management practice” type solutions (i.e., the conventional wisdom) applied evenly across the landscape are not necessarily the most effective approach. Site-specific design may be a more effective tool in minimizing negative impacts of development than generic policy prescriptions. “Good” policy should be a process by which better analysis of the problem leads ultimately to better design of the solution”.

Conclusion: These studies or reports were encompassed within the GP process and should be returned to the HCP RFP from whence they came. The potential consultants should be requested to advise what studies will be required to identify the wildlife habitat connectors.

### ***Corridor Overlay\****

Policy 7.4.2.9 directs that the IBC overlay shall apply to lands identified as having high wildlife habitat values because of extent, habitat function, connectivity, and other factors.

CONSULTANT will identify suitable connections between habitat areas for plants and animals to move through fragmented landscapes, **identified through the Land Use Assessment Report**.

CONSULTANT will coordinate input from USFWS, CDFG, and USFS. The approach should model landscape connectivity and reveal the most crucial linkages between habitats and predict how animals move through them, and identify “pinch-points”, where connectivity is most vulnerable.

CONSULTANT should evaluate the Saving and Greenwood study which identified primary corridor areas for wildland oak woodland landscape connectivity. In particular, the CONSULTANT should address viable north-south connecting corridors across Highway 50.

CONSULTANT will prepare a draft **Important Biological Corridor Report and Map for review by the Management Team, PAWTAC, and Board**. The report and map will be formatted as an appendix of the INRMP. CONSULTANT will prepare a compiled list of comments received from all reviewers. Following review of the draft report, County staff will prepare the final Important Biological Corridor Report as an appendix of the INRMP.

#### Comments:

##### Regarding Pawtac and the Stakeholders

Again, **Policy 7.4.1.6 states, “The County Agricultural Commission, Plant and Wildlife Technical Advisory Committee (Pawtac) , representatives of the agricultural community, academia, and other stakeholders shall be involved and consulted in defining the important habitats of the County and in the creation and implementation of the INRMP.**\_ Simply add stakeholders to the list.

##### Regarding Studies to Evaluate IBCs

According to this subtask, the IBC locations will be evaluated by reviewing Saving-Greenwood and the Land Use Assessment Report above discussed. In place of this language it is suggested the RFP direct the prospective consultants to advise the County what studies would be appropriate to determine what studies should be conducted by the consultant as necessary to assess habitat connectivity to identify essential linkages, choke-points and missing links, determine protection restoration and enhancement methods for movement corridors and native plant dispersal. These studies could consider the following:

1. Species specific studies for both umbrella and focus species movement. Utilize generally accepted survey techniques such as photo stations, scent stations, searching for scat and tracks, and incidental direct observations . Scope includes umbrella study without detail as to umbrella species or comparison to multi-species strategy;
2. Highway effect on these movements. Roads may be the most important cause of fragmentation. They serve both as barriers and corridors for movement;
3. Review of the “potential” north south connector discussed by Saving-Greenwood and feasibility as compared to other alternatives such as Weber Creek;
4. Feasibility (including costs ) of alternative connectors. Generally accepted feasibility factors include: **Land Use** – Native vegetation is optimal, **Zoning** – Open space is better than agricultural, **Protected Land** – Currently preserved lands are optimal, **CR Boundary** – Outside

the Community Regions is optimal **Number of Parcels** – Less parcels are optima, **Ownership** – Contiguous owners are optima.

; . 5. Analysis of elevation, vegetation, road density and other factors to define the best routes between protected lands (commonly recognized analysis factors);

6. “landscape permeability analysis,” a computer technique that models the difficulty that the various species would have moving between large conserved areas. Factors include vegetation types, elevation, slope and road density;

### **3.3.4 Refine initial inventory mapping/draft and final habitat inventory report\***

The Board has concluded that resource mapping and GIS data acquisition or capture conducted in development of the separate El Dorado County Oak Woodland Management Plan (OWMP) is sufficient for use as the primary component of the habitat GIS database for the INRMP. The OWMP relied primarily on the California Department of Forestry (CDF) Fire and Resources Assessment Program (FRAP) and California Wildlife Habitat Relationship (WHR) GIS data. These are the data that CONSULTANT will use for the INRMP vegetation data. CONSULTANT will acquire from readily available sources additional existing GIS data on ecological resources in the planning area (such as soils, streams, wetlands, watersheds, floodplains, land use). Under this scope of work,

CONSULTANT assumes that no additional vegetation, habitat, or land cover GIS data capture will be necessary for development of the INRMP.

CONSULTANT will initiate work on the Habitat Inventory using existing GIS data from the OWMP and other available sources.

Because the INRMP is a unique process, there is no precedent for habitat mapping standards. Actually, the more important point is the GP does not require a certain level of mapping so the BOS has discretion to adopt whatever standard it wants subject only to the deferential standard, “abuse of discretion.”

CONSULTANT will facilitate discussion with PAWTAC, Agencies, and the Board to define “Important Habitat” and “Large Expanses of Native Vegetation.” It is anticipated that the PAWTAC and Board will evaluate the data compiled by CONSULTANT and determine if it meets the INRMP needs as each group interprets the General Plan. Should these groups determine that the data prove less than sufficient for the INRMP, CONSULTANT, at the direction of the Management Team, would develop a scope of work and cost estimate to conduct the data development needed to meet the desired scope and resolution of the inventory. Any new habitat or other resource inventory and GIS data capture by CONSULTANT would be conducted under a separate scope of work at additional cost. Large expanses of native vegetation will be briefly described in the draft Habitat Inventory. Locations of large expanses of native vegetation will be derived from the existing OWMP GIS vegetation data supplemented by other data sources. CONSULTANT will work with PAWTAC and the Board to define “Large Expanses of Native Vegetation.”

Comments: Again, as to the role of PaWTAC Policy 7.4.1.6 states, “The County Agricultural Commission, Plant and Wildlife Technical Advisory Committee (**Pawtac**), representatives of the **agricultural community, academia, and other stakeholders shall be involved and consulted in defining the important habitats** of the County and in the creation and implementation of the INRMP. \_ Simply add stakeholders to the list.

### **Subtask 3.3.5 Coordinate with PAWTAC, DFG, and FWS\***

General Plan Policy 7.4.2.8 states that the habitat “inventory and mapping effort shall be developed with the assistance of the Plant and Wildlife Technical Advisory Committee, CDFG, and USFWS.” CONSULTANT will coordinate with the PAWTAC, DFG, FWS, and USFS as CONSULTANT develops the Habitat Inventory and DFG and FWS will be provided the opportunity to review the draft Habitat Inventory Report and provide input.

Comments: While Policy 7.4.2.8 does state Pawtac will assist in the inventory and mapping of the important habitats described in 8.4.2.8, Policy 7.4.1.6 states, The County Agricultural Commission, Plant and Wildlife Technical Advisory Committee (**Pawtac**), representatives of the **agricultural community, academia, and other stakeholders shall be involved and consulted in defining the important habitats** of the County and in the creation and implementation of the INRMP. Simply add stakeholders to the list.

### **Task 4. Develop INRMP Conservation Strategy/Prioritize\***

Under this task, CONSULTANT will develop the various components of the INRMP conservation strategy. General Plan Policy 7.4.2.8 required components for the INRMP are:

- Habitat Protection Strategy
- Mitigation Assistance
- Habitat Acquisition
- Habitat Management
- Monitoring

#### **Subtask 4.1 Develop Goals and Objectives\***

CONSULTANT will work with the Management Team, PAWTAC, and Board to develop biological goals and objectives for habitats and species under the INRMP.

CONSULTANT will prepare a list of draft goals and objectives for review. Following review by the Management Team, PAWTAC, and Board, CONSULTANT will finalize the biological goals and objectives. These goals and objectives will drive the development of all components of the conservation strategy.

Comments: This is completely contrary to the requirements of Policy 7.4.1.6 which reads: The County Agricultural Commission, Plant and Wildlife Technical Advisory Committee (**Pawtac**), representatives of the **agricultural community, academia, and other stakeholders shall be involved and consulted in defining the important habitats** of the County and in the creation and implementation of the INRMP. Simply add stakeholders to the list.

#### ***Subtask 4.4 Develop Habitat Acquisition Program\****

General Plan Policy 7.4.2.8 requires the development of “a strategy for protecting important habitats based on coordinated land acquisitions (see Habitat Acquisition Program, below) and management of acquired land.” The Policy further states that the “goal of the strategy shall be to conserve and restore contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the

county.”

CONSULTANT will develop a Habitat Protection Strategy as part of the INRMP Conservation Strategy that is integrated with the Habitat Acquisition Program (see Subtask 4.4).

Working with PAWTAC, CONSULTANT will develop principles and guidelines for establishing the INRMP conservation areas (i.e., habitat lands that are identified where willing landowners could be approached to negotiate habitat mitigation and other types of habitat conservation land acquisition under the INRMP). The habitat conservation system design guidelines will provide landscape-level conservation. These habitat conservation system design guidelines will address such parameters as the appropriate size, locations, and landscape position relative to other habitats for the identification of habitat conservation areas.

To help establish these guidelines, CONSULTANT will identify species whose key habitat parameters (e.g., minimum patches of potential conserved lands that can serve as functional habitat) encompass the habitat of a much larger number of species. Thus, designing habitat conservation areas that meet the needs of these broad ranging species will also meet the needs of species that use similar habitats. Other parameters for habitat conservation area design will focus on identifying a sufficient extent of specific habitats or habitat components that are exceptionally rare or fragile such as the gabbro soils or vernal pool terrain. In formulating conservation measures,

**Comments:** This appears to refer to an umbrella study. There is a need to identify the indicator species and whether this includes field studies. Typically, animals with legal protection are treated as umbrella species and they are usually overwhelmingly vertebrates. Vertebrates do not necessarily co-inhabit with invertebrates. Whether this analysis includes field data is unclear. Also, unclear whether a multi-species strategy based on systematic selection processes may be more appropriate.

CONSULTANT will look for opportunities to design the potential habitat conservation areas to complement and augment the values provided by existing INRMP Scope of Work preserved lands (e.g., the Pine Hill rare plant preserves, Spivey Pond management area) and sensitive habitat areas (e.g., designated critical habitat for California red-legged frog, deer habitat and migration corridors).

Conservation measures will be developed to conserve each of the major natural habitats.

These community-level conservation measures will address ecosystem functions necessary to sustain each natural habitat and will also provide for the protection of habitats for the special-status species associated with each of the habitats. The habitat protection strategy will provide specific conservation measures for addressing the adverse affects of construction of major linear projects (e.g., new 4- and 6-lane roadways) that create barriers to wildlife movement. Regarding conservation efforts relating to barriers, I simply add “where feasible”. The habitat protection strategy will also include other tools that can be utilized to provide for conservation and maintain corridors and connectivity.

**Comments:** This is the most egregious avoidance of the clear rights accorded the Stakeholders by 7.4.1.6 that, “The County Agricultural Commission, Plant and Wildlife Technical Advisory Committee (Pawtac), representatives of the agricultural community, academia, and other stakeholders shall be involved and consulted in defining the important habitats of the County and in the creation and implementation of the INRMP. Simply add stakeholders to the list.



Again, give the prospective consultants the task to connect where feasible the habitats and let them tell us what studies are required.

#### **Subtask 4.7 Prepare Draft and Final Conservation Strategy\***

*CONSULTANT will prepare a first draft Conservation Strategy Report for review by the Management Team, PAWTAC, and Board*

Comments: Add stakeholders to Pawtac.

#### **Subtask 4.8 Develop Regulatory Constraints for Important Habitat (IH) (for Rare, Threatened, and Endangered Species) and IBC\***

Policy 7.4.1.6 directs that “All development projects involving discretionary review shall be designed to avoid disturbance or fragmentation of important habitats (for Rare, Threatened, and Endangered Species in Objective 7.4.1) to the extent reasonably feasible. Where avoidance is not possible, the development shall be required to fully mitigate the effects of important habitat loss and fragmentation. Mitigation shall be defined in the INRMP.” Implementation Measure CO-U provides direction as to the implementation of the policy. County staff will author a section of the INRMP which clarifies implementation of mitigation for discretionary development that affects Important Habitat (for RTES), which will be reviewed by PAWTAC, Agencies, and Board of Supervisors. Policy 7.4.2.9 directs that the IBC overlay shall apply to lands identified as having high wildlife habitat values because of extent, habitat function, connectivity, and other factors. The policy also provides general direction as to regulatory provisions that shall be included.

*CONSULTANT will work with County staff, PAWTAC, Agencies, and Board of Supervisors to develop the regulatory provisions.* County staff will author a section of the INRMP which clarifies implementation of the IBC overlay. County staff will prepare a draft and final IBC overlay ordinance.

Comments: Again, add stakeholders.

#### **Task 5. Prepare Economic Analysis**

Policy 10.1.2.5 of the 2004 General Plan directs staff to prepare and present an analysis of the economic effect and taking implications of a proposed rule or regulation on private property and private property rights. Staff will prepare an economic analysis utilizing scenarios to illustrate the effect of the INRMP on costs to individual homeowners.

Comments: This should include economic feasibility analysis of different connection alternatives.

#### **Subtask 6.1 Prepare Administrative Draft INRMP**

Following completion of the various component chapters, County staff will prepare the administrative draft INRMP document. The draft INRMP will include the following  
*The administrative draft INRMP will be provided for review and comment to the Management Team, who will distribute to PAWTAC and Board. County staff will provide the administrative draft INRMP in Microsoft Word format files.*

Comments: Again, add stakeholders.

### **Task 7 CEQA Compliance**

CONSULTANT will provide CEQA compliance support to the County on the INRMP in the form of an Initial Study/Mitigated Negative Declaration (IS/MND).

### **Task 7 Prepare Draft and Final IS/MND\***

COMMENTS: While for budgeting and initial scope of work purposes a Mitigated Negative Declaration is planned. However, it is more probable an EIR will be required based on at least the following studies, effects and analysis:

1. Connectivity between northern and southern wildlands, including the barrier effect of roadways, including Highway 50. *The habitat protection strategy will provide specific conservation measures for addressing the adverse effects of construction of major linear projects (e.g., new 4- and 6-lane roadways) that create barriers to wildlife movement.*

2. **Conduct a study to identify riparian, connective, and critical corridors (Important Biological Corridors/IBCs)\*** *General Plan Policy 7.4.2.9 and Implementation Measure CO-N direct that the County will review the IBC overlay which shall apply to lands identified as having high wildlife habitat values because of extent, habitat function, connectivity, and other factors*

3. *To help establish these guidelines, SAIC (CONSULTANT) will identify species whose key habitat parameters (e.g., minimum patches of potential conserved lands that can serve as functional habitat) encompass the habitat of a much larger number of species. Thus, designing habitat conservation areas that meet the needs of these broad ranging species will also meet the needs of species that use similar habitats. Other parameters for habitat conservation area design will focus on identifying a sufficient extent of specific habitats or habitat components that are exceptionally rare or fragile such as the gabbro soils or vernal pool terrain*

4. Determine where no net loss would be appropriate and amend GP if necessary to provide no net loss standards.

5. Mitigation Fee Nexus Report.

6. There appears to be consensus that the IBCs need to be revisited and most probably redrawn. Since the current IBCs locations are included in the GP, relocation would require a GP amendment which will most probably not be based on a MTD.

7. In the GP litigation the opponents argued the GP EIR should have included studies and guidelines for such mitigation measures as the INRMP. At page 21 the Court ruled, "This court finds petitioner's contentions to be without merit. The general plan is a broad planning-level document and does not involve approval of a specific project...Thus the EIR must focus on secondary effects of adoption, but need not be as precise as an EIR on the specific projects which might follow". Again, it is more probable an EIR on focused subjects will be required.