January 30, 2009

Mr. Ron Briggs, Chairman El Dorado County Board of Supervisors 330 Fair Lane, Building A Placerville, Ca 95667

> Re: Indian Creek Ranch Subdivision Agenda Item 23-February 3, 2009

Dear Chairman Briggs and Members of the Board:



My office represents the applicant for the Indian Creek Ranch Subdivision, which has been forwarded to your Board with a recommendation for approval from the Planning Commission. Specifically, we thought it was important to respond to a letter submitted at the Planning Commission hearing by the Center for Sierra Nevada Conservation, dated December 10, 2008 (the "CSNC Letter"). The CSNC Letter states that the project is not consistent with adopted County programs and therefore should not be approved. This assertion is simply not true.

The key assertion made by the author of the CSNC Letter is that a study entitled *The Potential Impacts of Development on Wildlands in El Dorado County, California* (Saving and Greenwood, 2002) was *adopted* by the County as part of the DEIR for the 2004 General Plan. However, the study was never adopted by the County. It was merely utilized as background for the overall discussion of potential biological impacts contained in the DEIR. It is important to note that the Saving and Greenwood study analyzed impacts associated with the 1996 General Plan, because that plan did not contain a number of the policies ultimately incorporated into and adopted with the 2004 Plan which would be protective of biological resources. Examples of these new policies include the prohibition of development on slopes in excess of 30%, the establishment of the Important Biological Corridors (IBC's), and the adoption of the Integrated Natural Resources Management Plan ("INRMP"). Further, the 1996 General Plan policy allowing *retention or replacement* of oak canopy was revised to require *retention and replacement* in the 2004 General Plan Policy 7.4.4, along with the requirement to

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prepare both an Oak Woodland Management Plan and INRMP. Accordingly, the Saving and Greenwood study may not be reflective of the operative General Plan and may be overstated or inaccurate.

Notwithstanding the limitations described above, the findings of the Saving and Greenwood study did create an important backdrop for policies that were adopted by the Board of Supervisors relating to connectivity and wildlife movement. The author of the CSNC Letter suggests that approval of the Indian Creek Subdivision would render mitigation measures relating to wildlife habitat fragmentation contained in the General Plan DEIR moot. The reality is that the mitigation measures discussed in the DEIR in the context of the Saving and Greenwood study were incorporated into the General Plan as policies, as required by CEQA. Most importantly in the context of this discussion, the Board adopted General Plan Policy 7.4.2.9 and Implementation Measure CO-N, which created and provides for the updating of IBC's. The IBC's provide the north-south connection over/across Highway 50 raised as a concern in the CSNC letter. Significantly, one segment of the IBC is within the area targeted by Saving and Greenwood as the potential corridor providing for connectivity between the northern and southern portions of the County. The areas identified by Saving and Greenwood and the IBC's as adopted in the General Plan are shown in the materials attached to the letter from Jeff Little of Sycamore Environmental Consultants, which is attached to this letter as an exhibit. Contrary to the assertions made in the CSNC Letter, the Indian Creek project is not within any of the areas designated in the General Plan as an IBC, nor within any areas identified by Saving and Greenwood as providing connectivity to mitigate for the fragmentation of wildlands.

There may be a practical explanation why the General Plan preparers did not designate the Indian Creek location as an IBC. First, the Indian Creek project is located in an area that is largely surrounded by existing development to the east, north, and south. Second, there are no bridges, underpasses or similar large structures allowing movement of wildlife under Highway 50 at this location. The only crossings at this location are small drainage culverts that originate in developed neighborhoods and run at least the entire width of the freeway right of way. Accordingly, there is no practical way to achieve any meaningful level of connectivity.

The CSNC Letter also states that the project would conflict with proposed mitigation for wildland fragmentation in the Oak Woodland Management Plan ("OWMP") and the Integrated Natural Resources Management Plan ("INRMP"). The OWMP as adopted by the Board of Supervisors does not incorporate any language or

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exhibit which designates the Indian Creek area as a Priority Conservation Area, the term utilized by the OWMP for designated mitigation areas to ultimately be utilized in the preparation of the INRMP. It should also be pointed out that the project could not be part of any proposal relating to the INRMP as the formal preparation of the INRMP has not begun, other than the Board of Supervisors adoption of the initial inventory and mapping which does not designate the Indian Creek project area as an area of concern.

General Plan Policy 7.4.2.1 provides for the protection, to the extent feasible, of "identified critical fish and wildlife habitat, as identified on the Important Biological Resources Map maintained at the Planning Department through any of the following techniques: utilization of open space, Natural Resource land use designation, clustering, large lot design, setbacks, etc." Within the Project site, the only area identified on the Important Biological Resources Map is Indian Creek and the reservoir which are protected by inclusion in open space, clustering and mandatory setbacks in compliance with the General Plan. Further, the site-specific biological survey by Sycamore Environmental Consulting reveals the presence of no special status species on the property, which may have triggered any other mitigation requirements of the General Plan.

Contrary to the assertions in the CSNC Letter, the County has provided for north-south connections across the Highway 50 corridor through the inclusion of the IBC's in the 2004 General Plan. The location of the IBC's were designated, based in part on the recommendations of Saving and Greenwood, at the *only* reasonable locations available, which were limited by existing development and the inability to provide suitable locations to cross Highway 50. As set forth very specifically in the letter attached from Jeff Little, the Indian Creek project is *not* located in an area designated by Saving and Greenwood for mitigating fragmentation; *not* within an IBC as adopted in the General Plan; and *not* within a Priority Conservation Area pursuant to the OWMP. The assertion of inconsistency made in the CSNC letter is either mistaken or disingenuous.

Very truly yours, Aaig to Aardberg Craig M. Sandberg

CMS:ms Enclosure SYCAMORE Environmental Consultants, Inc.



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29 January 2009

Ms. Cynthia L. Shaffer Echo Lane Investors, LLC P.O. Box 630 El Dorado, CA 95623

Phone: 530/ 622-6010 Fax: 530/ 642-0435

## Subject: Response to Issues Raised by the Center for Sierra Nevada Conservation Comment Letter of 10 December 2008 for the Indian Creek Ranch Project, El Dorado County, CA.

Dear Ms. Shaffer:

The Center for Sierra Nevada Conservation (CSNC) submitted a comment letter to the El Dorado Planning Commission regarding the Indian Creek Ranch Project (Project) dated 10 December 2008. The purpose of this letter is to discuss more fully several of the issues raised by the CSNC, particularly as they relate to a report prepared by Saving and Greenwood (2002).

The basis of most of the CSNC comments, including the statement that the Project "would fall directly in the lands proposed . . . for mitigating wildland fragmentation," appear to derive from CSNC incorrectly locating the Project on the Saving and Greenwood maps. The Saving and Greenwood maps do not show physical landmarks such as Highway 50, Highway 49, or creeks. The Saving and Greenwood maps are thus difficult to use on the scale of individual projects. Using GIS and other mapping technologies we identified the location of the Project on the Saving and Greenwood maps.

## Discussion of Project relative to Saving and Greenwood

The CSNC letter points out that the Saving and Greenwood report evaluated the acquisition of conservation easements across the Highway 50 corridor. The purpose of the easement acquisition scenario (scenario 543 in Saving and Greenwood) would be to connect large areas of wildland habitat in the northern and southern areas of the County. CSNC points out that Saving and Greenwood specifically mention the Indian Creek area and quotes the following passage:

"Alternatively, we examined a limited parcel acquisition, or easement, strategy (Scenario 543) for areas of concern which removes key parcels from the potential development landscape. One such area is the Indian Creek Canyon region. Here, a stringer of oak woodlands presently connects the northern and southern wildland patches." (Page 457)

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We have prepared a series of maps which demonstrate the Project location relative to the easement acquisition area evaluated by Scenario 543. Rasterized versions of Saving & Greenwood's figures 2(d) and 5 were extracted from a PDF version of the report available from a U.S. Forest Service website (http://www.fs.fed.us/psw/publications/documents/gtr-184/039\_Saving.pdf). The rasterized versions of the figures were imported into ArcGIS and geo-referenced to California state plane coordinates using the Saving & Greenwood study area boundary and shape files of the County's boundary and major roads. The County boundary and major roads were obtained from California Spatial Information Library (CASIL). The CASIL information was created using USGS topographic quad maps. Therefore, the overlay fits on the 1''=2000' or 1:24,000 scale. The creeks and secondary roads shown in the figures were obtained from El Dorado County's GIS Online datasets. The upstream intermittent reach of Indian Creek (south of Highway 50) was digitized and added based on the USGS Placerville quad map. The Important Biological Corridor (IBC) layer was obtained from El Dorado County. The aerial photograph was downloaded using DigiGlobe's ImageConnect Software.

Figure 1 is the Project boundary and County road network overlaid on the "current" wildland habitat figure (Figure 2d) from Saving and Greenwood. Saving and Greenwood used land cover data from 1990 and existing parcel data from 1996, so "current" conditions references are actually at least 12 years old. Figure 1 demonstrates that the Project site is in a patch of wildland (green) that Saving and Greenwood concluded was already isolated from other wildland habitat (the largest patch of which is in red). The different colors on the map indicate isolated areas of wildland habitat. Figure 2 is a close up of the same data showing areas from Cameron Park to Placerville, and adding the named creeks and secondary roads. The "north-south" corridor of wildland habitat is west of the Project.

Figure 3 is the Project boundary and County road network overlaid on Scenario 543 (Figure 5 from Saving and Greenwood). Scenario 543 evaluated the acquisition of conservation easements to preserve the north-south corridor of wildland habitat across Highway 50. Figure 3 demonstrates that the Project site is east of the north-south corridor. Figure 4 is a close up of the same map showing areas from Cameron Park to Placerville, again adding the named creeks and secondary roads.

As noted above, Saving and Greenwood specifically identify the "Indian Creek Canyon region" as the area where parcel acquisition could occur to connect the large wildland habitat areas in the north and south across Highway 50. Figures 2 and 4 demonstrate that the proposed wildland habitat corridor does not actually follow Indian Creek, or any other single creek. Rather, the point where the proposed wildland habitat corridor (red) nearly connects with the northern wildland habitat (blue) in Figure 4, is along Indian Creek just upstream of its confluence with Weber Creek, and just downstream of the Indian Creek Reservoir. The Indian Creek Reservoir is approximately 3 creek miles downstream from the Project boundary. From that point, the proposed wildland habitat corridor (red) extends south, roughly following Shingle Springs Drive. The proposed wildland habitat corridor would connect the South Fork American River watershed with the Cosumnes River watershed in the south.

Figure 5 clearly shows the Project is not in the IBC. We have overlaid the IBC layer on Figure 4 to create Figure 6. Figure 6 demonstrates that the IBC roughly follows the north-south wildland habitat corridor evaluated by Saving and Greenwood Scenario 543, and also includes the Weber Creek corridor under Highway 50. When the Board of Supervisors adopted the General Plan (El Dorado County 2004), they designated the IBC to protect two north-south corridors across Highway 50. The

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first is the location identified by Saving and Greenwood and the second is along Weber Creek. Figure 7 shows the IBC and Project location overlain on a 1 November 2002 aerial photograph.

#### Discussion of Project relative to the Oak Woodland Management Plan

The County adopted an Oak Woodland Management Plan (OWMP) on 6 May 2008. The OWMP designates "priority conservation areas" (PCA) where the County will focus efforts to acquire conservation easements on private land with oak woodlands from willing sellers. Figure 8 is the OWMP map of the PCA locations (with the Project Location added), as well as other areas connecting the PCAs (publicly owned lands, the IBC, and some of the larger rivers and creeks that are subject to setbacks under General Plan Policy 7.3.3.4.). The OWMP (incorporated by reference in its entirety) does not designate any PCAs near the Project. The Project is not in any of the areas designated by the OWMP as PCAs or the areas connecting the PCAs. The OWMP will be a component of the County's Integrated Natural Resources Management Plan (INRMP).

#### Summary

Saving and Greenwood evaluated county-wide wildland habitat connectivity as does the General Plan. The GP EIR addresses the issues of cumulative impacts on wildlife habitat fragmentation and wildlife movement on a county-wide scale. The Project is not in the wildland habitat corridor evaluated by Saving and Greenwood Scenario 543, or the IBC adopted as part of the General Plan. The Oak Canopy analysis previously submitted to the County for the Indian Creek Ranch Project notes that the Project is not in the IBC (Sycamore Environmental 2008). The reference to the "Indian Creek Canyon region" by Saving and Greenwood does not appear to refer to the entire length of Indian Creek, or the reach of Indian Creek on the Project, but rather to a reach of Indian Creek downstream of the Project. The Project is not in any area proposed for focused mitigation of oak woodlands by the OWMP (PCAs, the IBC, or federal lands). At the project level, the Indian Creek Ranch project maintains open space and wildlife movement opportunities.

Please call me if you have any questions.

Cordially,

Atty Lotte

Jeff Little Vice President

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Attachments:

- Figure 1. Saving and Greenwood Current Wildland Habitat as of 1990-1996
- Figure 2. Close Up of Saving and Greenwood Current Wildland Habitat as of 1990-1996
- Figure 3. Saving and Greenwood Wildland Habitat After Full Buildout for Parcel Acquisition Scenario (543)
- Figure 4. Close Up of Saving and Greenwood Wildland Habitat After Full Buildout for Parcel Acquisition Scenario (543)
- Figure 5. Important Biological Corridor (IBC)
- Figure 6. Close Up of Saving and Greenwood Wildland Habitat After Full Buildout for Parcel Acquisition Scenario (543) with IBC
- Figure 7. IBC and Aerial Photograph
- Figure 8. OWMP Map

## Literature Cited

- El Dorado County. Adopted 19 July 2004. El Dorado County general plan, a plan for managed growth and open roads; a plan for quality neighborhoods and traffic relief. El Dorado County Planning Department, Placerville, CA.
- El Dorado County. Adopted 6 May 2008. Oak woodland management plan. El Dorado County Development Services Department—Planning Services, Placerville, CA. < http://www.co.eldorado.ca.us/Planning/OakWoodlandsAdoptedMay2008.html>
- Saving, S. C. and G. B. Greenwood. 2002. The potential impacts of development on wildlands in El Dorado County, California. USDA Forest Service Gen. Tech. Rep. PSW-GTR-184.
- Sycamore Environmental Consultants, Inc. 27 May 2008. Oak canopy analysis for the Indian Creek Ranch project. Prepared for Echo Lane Investors, LLC. El Dorado, CA.

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<sup>05092</sup>\_Fig3FullBuildoutWildland.mxd







<sup>05092</sup>\_Fig7IBCAenal.mxd

# The Potential Impacts of Development on Wildlands in El Dorado County, California

# Saving, S. C.<sup>1</sup> and G. B. Greenwood<sup>2</sup>

## Abstract

We modeled future development in rapidly urbanizing El Dorado County, California, to assess ecological impacts of expanding urbanization and effectiveness of standard policy mitigation efforts. Using raster land cover data and county parcel data, we constructed a footprint of current development and simulated future development using a modified stochastic flood-fill algorithm. We modeled combinations of constraints from the 1996 County General Plan and parcel data - slope, stream buffers, oak canopy retention, existing development, public ownership, regional clustering, and acquisition programs - and overlaid development outcomes onto the land cover data. We then calculated metrics of habitat loss and fragmentation for natural land cover types. Rural residential development erodes habitat quality much more than babitat extent. Policy alternatives ranging from existing prescriptions to very restrictive regulations had marginal impact on mitigating habitat loss and fragmentation. Historic land parcelization limits mitigation of impacts by the current General Plan prescriptions that only apply when a parcel requires subdivision before development. County-wide ordinances were somewhat more effective in preserving habitat and connectivity. These solutions may not offer enough extra protection of natural resources to justify the expenditures of "political capital" required for implementation. Custom, parcel based acquisition scenarios minimized habitat loss and maximized connectivity. Better analysis of public policy and planning design may be a more effective "smart growth" tool than genetic policy prescriptions.

# INTRODUCTION

The California Department of Finance projects the State's population to increase from 34 million to over 45 million by the year 2020 (California Department of Finance 2001). During the past 20 years, the spatial distribution of California's population has also changed as more people moved to the periphery of the dense Los Angeles and San Francisco Bay metropolitan areas and to the historically lower density Central Valley and Sierra Nevada foothills (U.S. Census Bureau 1991, 2001). Since the eastern half of many of these Sierran counties is predominantly national forest above 1,500 meters, the vast majority of this additional population will reside in the lower elevation foothills, a region dominated by oak hardwood savannah. The hardwood rangeland region of the Sierra, extending from 100 to 1,500 meters in elevation, is almost exclusively privately owned and has historically been used for grazing and some dryland farming (Greenwood and others 1993, Duane 1996). The switch from large parcel, low to moderate intensity agriculture to small parcel, high intensity urban and ex-urban land use promises great change to the natural

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ecosystems of the foothills region. These 5-acre to 40-acre ranchettes will likely contain the majority of naturally functioning hardwood landscape in the near future.

One such region of rapid change is El Dorado County in the Central Sierra Nevada Mountains. We conducted a policy analysis of the El Dorado County General Plan by modeling development in the western, foothill portion of the county. We were interested in two topics: 1) ecological impacts on wildland habitat resulting from expanding urbanization under the County's General Plan; and 2) the effectiveness of commonly proposed land use policy initiatives to mitigate those impacts. Several models exist for projecting development expansion at the county and regional scale (Landis 1994, 1995, 1998a, 1998b; Johnston 2000, 2001; US Environmental Protection Agency 2000). These models focus on dense urban development (1 - 2 acre parcels or smaller) using economic formulas of land values and empirically derived "attractors" of development such as proximity to existing infrastructure (roads, sewer, water, etc.) to guide development probabilistically and incrementally over time. However, in rural areas (5 - 40 acre parcels), where attractors are less obvious or more difficult to model, or where tractable economic factors are not the primary drivers behind development decisions, these models generally ignore rural development or resort to random allocation (Johnston 2001). In El Dorado County, the General Plan designates 23 percent of the county for development in this rural density range. In order to adequately predict impacts in these regions, we needed to place the existing and potential footprint of development as explicitly as possible. We developed a cell-based, empirical model that characterizes development patterns from existing development and then extends those patterns across the landscape onto vacant lands. Because we were primarily concerned with the relative impacts of the county's General Plan and alternative policy proposals, we chose to extend development to full "buildout" of the General Plan, approximately a 20 year time horizon, rather than incorporating an economic component which might allow the phasing of development over time.

We began by determining where development existed in 1996, the most recent year for which digital parcel data were available. We then predicted where development would be at full buildout of the General Plan under various scenarios (e.g., uncontrolled vs. smart growth, strict vs. loose environmental land use policy, and combinations thereof). For any given scenario, our model can assess the implications for a variety of issues ranging from natural ecosystem functions to local and regional economies to general quality of life. At present, we have analyzed a wide range of land use policies in the County and their relative impacts on two major areas of concern, wildland habitat quality (characterized by extent, fragmentation, and configuration) and economic costs and losses due to wildfire. This paper presents our research on the former.

## STUDY AREA

El Dorado County is a predominantly rural county in the Central Sierra region of California stretching from the floor of the Central Valley east of Sacramento to the crest of the Sierras and the southern portion of Lake Tahoe (mean latitude 38.75° N, mean longitude 120.5° W). The county's 463,500 hectares cover a wide diversity of babitats including low elevation annual grasslands and blue oak (*Quercus douglasii*) savannah at the western edge, mid-elevation oak woodlands and mixed oak-conifer-shrub complexes in the central region, and Sierran mixed conifer forest dominated by

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ponderosa pine (*Pinus ponderosa*), Jeffrey pine (*Pinus jeffreyi*), and lodgepole pine (*Pinus contorta*) in the eastern half. According to the 2000 Census (U.S. Census Bureau 2001), 156,299 people lived in El Dorado County at an overall density of 33.7 persons/km<sup>2</sup>. However, because the eastern half of the county is almost entirely national forest except for settlements on the southern littoral edge of Lake Tahoe, the average density for private lands is 63.3 persons/km<sup>2</sup>. Housing density is 28.9 units/km<sup>2</sup>. Our study area encompasses 220,954 ha and is restricted to the predominantly privately owned western foothills region of the county (*fig. 1*).

From the time Gold Rush pioneers settled in the 1850's, the population of El Dorado County fluctuated between 6,000 and 20,000 people until the 1950's. Since that time the decadal growth rate has ranged from 20 percent to 100 percent, with growth rates of 46.8 percent and 24.0 percent in the 1980's and 1990's, respectively (U.S. Census Bureau 1991, 2001). State Department of Finance projections indicate this magnitude of growth continuing for the next two decades resulting in 252,900 residents by 2020 (California Department of Finance 2001).

# METHODS

#### Study Design

The purpose of this 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. We modeled several

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Figure 2 – a) land cover types from 1990 Hardwoods Pixel Data (Pacific Meridian Resources, 1994), b) 1996 El Dorado County Adopted General Plan land use classes collapsed to 6 categories (see Table 2 for land use codes), c) footprint of current and future development under General Plan scenario (503), and d) map of current wildland habitat in the study area.

alternative scenarios, three iterations each, by varying one or more of the General Plan prescriptions, as well as the possible spatial configuration of future development (*table 1*), and overlaying the resulting footprint of development onto the land cover data and measuring the core extent, fragmentation and configuration of wildland. As we intended this work to be directly relevant to issues facing the county, many of these scenarios were devised from suggestions by residents and county officials. Thus, we did not attempt to analyze every possible combination of variables, especially as it became apparent that one of them was not proving to be effective in mitigating the impacts on wildland.

We used three main geographic information system (GIS) datasets as inputs: 1) 1990 Hardwood Rangelands Pixel Data (Pacific Meridian Resources 1994) for land cover and current footprint of development (fig. 2a); 2) 1996 County Assessor's parcel data for land tenure information; and 3) 1996 Adopted County General Plan for future potential development densities (fig. 2b). We converted the parcel and General Plan data to 25 m raster grids and snapped them to the Hardwoods data. We conducted all spatial modeling with ESRI's ARC/INFO and GRID software (vers.

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	Slope/Stream Restrictions			Canopy Retention*			Other Restrictions			Total Area (ha)
Scenario	Description	Extent	Area (ha)	Description	Extent	Area (ha)	Description	Extent	Area (ha)	Restricted <sup>1</sup>
500	Present Condition	-	-	-	-	-			-	•
503	25 m stream selbacks < 40% slope	subdiv	19 567	as ner GP	subdiv	5 980				122 774
504	25 m stream setbacks < 40% slope	all	26.983	as per GP	subdiv	5 980		2		122,774
505	50 m stream anthonica < 40% slope	oubdlu	22,300	os por CR	aubdiv.	5,500	-		-	120,009
003	50 m stream sewacks, < 40% slope	Subury.	23,318	as per Gr	SUDDIV.	5,900	-		•	125,968
506	50 m stream setbacks, < 40% slope	all	31,819	as per GP	subdly.	5,980	-	-	-	132,694
507	25 m stream asthocks < 40% slope	nubdhu	10 567	an nor CD	subdly	£ 090	Clusterios	LDD subdiv	10 506	100 774
507	25 m sheam settacks, < 40% slope	SUGUIV.	18,007	as per Gr	SUDUR.	0,900	Clusibility	LDR, SUDDIV.	12,528	122,114
508	25 m stream setbacks, < 40% slope	subdiv.	19,567	as per GP	subdiv.	5,980	Clustering*	LDR, subdiv.	12,526	122,774
509	25 m stream setbacks, < 40% stope	subdiv.	19,567	Increased <sup>®</sup>	subdiv.	7,096	-	-	-	123,920
		v (42)			620	22 10.144				
513	25 m stream setbacks, < 40% slope	subdiv.	19,567	as per GP	all	6,409	_	-	-	123,368
514	25 m stream setbacks, < 40% slope	all	26,983	as per GP	all	6.409	-	-	-	128,944
515	50 m stream setbacks, < 40% slope	subdiv.	23,319	as per GP	all	6,409	-	-		126,564
516	50 m stream setbacks, < 40% slope	all	31,819	as per GP	all	6,409		-		133,217
520	50 m stream setbacks, < 40% slope	all	31,819	as per GP	all	8,409	Clustering <sup>d</sup>	LDR, subdiv	12,528	133,127
543	25 m stream setbacks, < 40% slope	subdiv.	19,657	as per GP	subdiv.	5,980	Acquistion	AOC	2,071	124,513

 Table 1 – Description of the combinations of restrictions used for each scenario tested

\* Canopy retention restricts development by limiting the amount of development. In most cases, this does not mean complete restriction but rather a reduction

in density only (Table 2). See Greenwood and Saving, 1999.

<sup>b</sup> For details, see Greenwood and Saving, 1999.

<sup>6</sup> Proportion (B) of developed cells increased from 9% to 14%. Adjacency (C) increased from 55% to 95%

<sup>d</sup> Proportion (B) of developed cells increased from 9% to 14%. Adjacency (C) increased from 55% to 98%.

<sup>9</sup>We manually selected parcels to be restricted to development in Areas of Concern (AOC).

<sup>1</sup> Includos all restrictions plus existing developed parcels, parcels closed to development, public ownership, and arces designated Open Space (OS) in the General Plan.

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2002.

7.1.1 - 8.1) on UNIX workstations except the fragmentation metrics, which we calculated using APACK v. 2.15 (Mladenoff and DeZonia, 2000) on a Windows2000 operating system. An in-depth detail of our methodology has been previously published on the CDF-FRAP website (Greenwood and Saving 1999). Here, we present only a basic overview.

### Creating the Footprint of Development

In order to model future development, we first had to construct a pixel-based footprint of current development which showed as explicitly as possible where structures and other human disturbances to the natural landscape exist. Remote sensing-based pixel data, such as the Hardwoods data, serve this purpose to some degree, especially in rural areas (Merenlender and others 1998; Ridd and Liu 1998), but provide no context of land use. Such data also miss development obscured by tree canopy and tend to confuse some urban and non-urban land cover types (e.g., rock outcrops and concrete) (Ouarmby and Cushnie 1989; Fisher and Pathirana 1990; Bruzzone and others 1997). From the parcel data we determined the land use of each parcel and thus derived two binary layers - development status (developed or vacant) and intensity of use (intense or not intense) at the parcel level. For developed and intense parcels smaller than 1 hectare (2.5 acres), we included the entire parcel in the footprint. However, for larger parcels we turned to the Hardwoods data to identify specific areas of human disturbance within the parcel. We compared the classes Urban and Other (U/O) from the Hardwoods data to the development status of the parcel data. Where a U/O pixel(s) existed inside a developed parcel, we included those U/O pixels in the footprint of current development. Where a U/O pixel(s) existed in a vacant parcel, we considered those pixels "false positives" and did not include them in the footprint of current development, although they did remain in the land cover layer as Barren. For developed parcels with no U/O pixel(s), we simulated a pattern of development in the parcel using the same technique to project future development patterns (see below). Thus, we created a picture of current development composed of three elements: 1) small, intensely used parcels; 2) scattered pixels of development in larger parcels; and 3) stochastically placed pixels in developed parcels within which we could not determine the explicit location of development (fig. 2c).

The first step in creating the *footprint of future development* required knowing where development could *not* occur. From the General Plan we derived a *restriction status* for each parcel. A parcel was *closed to future development* if it were already *developed* and already at the minimum allowable lot size for that General Plan density class. Alternatively, a parcel was *open to development with restrictions* imposed by the General Plan (i.e., discretionary permit review) if it were *developed* or *vacant* but at least twice as large as the allowable minimum lot size, meaning the lot could be further subdivided. Finally, a parcel was *open to development without restriction* (i.e., ministerial review) if it were *vacant* and already at the minimum allowable lot size for that General Plan density class and therefore could not be subdivided further.

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**Table 2** - Canopy retention guidelines from Adopted General Plan Values represent<br/>percentage of canopy that must be retained for each combination of General Plan Land Use<br/>Class and Current Canopy Closure percentage. Where 100 percent of the canopy must be<br/>retained, no development can occur on oak pixels.

	Current Oak Canopy Closure (%)					
General Plan Land Use Class	<u>≤ 1</u> 9	20-39	40-59	60-79	80-100	
Multi-family Residential (MFR)	90	85	80	70	60	
High Density Residential (HDR)	100	90	80	70	65	
Medium Density Residential (MDR)	100	90	80	70	65	
Low Density Residential (LDR)	100	100	90	85	80	
Rural Residential (RR)	100	100	100	95	90	

The General Plan contained three major restrictions applying to discretionary permit review that we were able to model spatially -25 m (1 pixel) stream setbacks<sup>3</sup>, no development on slopes over 40 percent, and an oak canopy retention guideline based on the density class of development and the existing canopy cover (*tables 1, 2*). We created a separate mask for each of these restrictions which could be turned on or off or, in order to simulate an ordinance, be applied to all parcels open to development regardless of restriction class. We also created similar masks reflecting 50 m stream buffers and increased canopy retention. Lastly, some areas were off limits to development in every scenario – areas classified as Urban or Other in the Hardwoods data, parcels that were *developed* and *closed to future development*, public lands, private reserves, easements, and open space designated in the General Plan.

Once we determined where development was allowable, we then determined the spatial configuration of development at the 25 m pixel scale. McKelvey and Crocker (1996) developed a stochastic flood-fill algorithm to create theoretical landscapes burned by fire using two aspects of spatial configuration - proportion (B) of landscape burned by fire, and the spatial adjacency (C) of the burned pixels. Adjacency is defined as the probability that if a cell is burned, an adjacent cell is also burned.<sup>4</sup> We modified their algorithm to create binary neutral landscapes that mimic the development patterns for each housing density class in the General Plan. By overlaying the Urban and Other pixels from the Hardwoods data onto classified 1990 Census block housing density data, we calculated proportion (B) and adjacency (C) for landscapes settled at different densities. The proportion of Urban and Other pixels ranged from 27 percent for housing density classes greater than 1 unit/acre down to 3 percent for density classes less than 1 unit/40 acres (table 3). Adjacency values varied to a lesser degree, ranging from 62 percent to 50 percent over the same housing density range (Greenwood and Saving, 1999). By masking non-developable areas and inserting portions of these theoretical landscapes into the appropriate

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<sup>&</sup>lt;sup>3</sup> The Adopted General Plan calls for 100' stream setbacks. Since our model is raster based, we used a one pixel (25 m) buffer as the closest estimate.

<sup>&</sup>lt;sup>4</sup> McKelvey and Crocker refer to the adjacency measure (C) as contagion. To avoid

confusion with the contagion indices of O'Neill et al. (1988) and Li and Reynolds (1993), we have chosen to use the term adjacency.

**Table 3**—General Plan land use classes and allowable lot sizes with proportion of cells (B) from the Hardwoods data classified as Urban or Other and likelihood of adjacency (C) of Urban and/or Other cells.

General Plan Land Use Class	Allowable Lot Size	Proportion of Urban or Other Cells (B)	Probability of Adjacency (C)	
Multi-family Residential (MFR), High Density Residential (HDR)*	<= 1 acre	27%	0.62	
Medium Density Residential (MDR) <sup>5</sup>	1 - 5 acres	14%	0.61	
Low Density Residential (LDR)	5 - 10 acres	9%	0.55	
Rural Residential (RR)	10 - 40 acres	6%	0.55	
Natural Resources (NR)	40 - 160 acres	3%	0.50	

\* Includes these General Plan Land Use Classes - Adopted Plan (AP), Commercial (C), Industrial (I), Public Facilities (PF), and Research and Development (RD)

<sup>b</sup> Includes Tourist Recreation (TR)

General Plan density region, we created potential *footprints of future development* for the study area (fig. 2c).

For most scenarios, we assumed the spatial configuration of development for a given density class would not be significantly different in the future than at present. In other words, the values of B and C for a given density class did not change. However, the model did not limit us to this assumption. The General Plan allows for the doubling of total housing density in the Low Density Residential (LDR) class (5 - 10 acre parcels) if the development is highly "clustered". Our landscape generator allowed us to easily simulate how this development pattern might appear (scenarios 507 and 508). We created two clustered density patterns for LDR by increasing B from 9 percent to 14 percent to simulate the density bonus, and by increasing C from 55 percent to 95 percent and 98 percent to simulate clustering (*table 1*).

#### Quantifying Impacts to Wildand Habitat

For this analysis, we defined *habitat* as all land cover types in the 1990 Hardwoods Pixel Data that were not Urban, Other, or Water. We combined Urban and Other pixels, along with developed cells from the *footprint of future development*, into one class called *developed*. Water was masked from the analysis environment. We defined *wildland habitat* as *habitat* more than 50 m (2 pixels) from a *developed* pixel, in patches greater than 100 hectares and containing no constrictions, or narrow necks, of *wildland habitat* narrower than 50 m. *Urban habitat* were those areas of natural vegetation within 50 m of a *developed* pixel, whereas *marginal habitat* were all areas not defined as *urban* or *wildland habitat* (narrow constrictions or patches less than 100 hectares, and > 50 m from *developed* pixels). This overlay of the footprint of development onto the natural land cover creates a landscape mosaic of wildland, marginal and urban habitats.

A quick review of the landscape ecology literature reveals many highly specialized metrics for capturing specific characteristics of a landscape. Several studies (Ritters and others 1995; McGarigal and McComb 1995, 1999; Tinker and others 1998; Hargis and others 1999) have shown that the simplest, most basic measures are the easiest to understand and serve well to compare and contrast

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landscapes. We calculated the following fragmentation metrics for wildland habitat for each scenario – total area, number of patches, mean patch size, largest patch size, mean shape index (McGarigal and Marks, 1995; Ritters 1995; Frohn 1998), corrected mean perimeter/area ratio (Baker and Cai 1992), and total edge density. Ritters (1995) inverts McGarigal and Marks' (1995) mean shape index for raster data, calling it "average normalized area, square model," to make the values range from 1.0 for a perfectly square patch to 0.0 for patches that are long and narrow. The APACK software calculates Ritters' metric. As this metric measures the same landscape attribute as McGarigal's mean shape index (shape complexity - patch shape relative to a square), we have chosen to use McGarigal's name, mean shape index, when referring to it rather than Ritters' more cumbersome moniker. Although these metrics provide an objective means of comparing landscapes, they do not quantify all aspects of landscape configuration. Therefore, we also assessed model results through visual inspection of the output maps of wildland extent.

## RESULTS

#### General Plan

Figure 2d shows the present extent of wildland habitat in the study area. The dominant feature of the landscape is a single patch of wildland (mean area of all iterations, 159,535 ha) that extends across the county from north to south and bridges the Highway 50 corridor. The influence of development is substantial yet would appear not to have significantly disrupted the contiguity of wildlands outside of the Highway 50 corridor and the communities of Pilot Hill and Georgetown. Figure 4a shows how the county's wildlands might appear if the General Plan were completely built out (scenario 503). The most apparent impact is the increase in number of patches and the cleaving of the wildland into distinctly separate northern and southern regions. Compared to present conditions, mean number of patches per iteration double from 10.0 to 19.67 and mean patch size accordingly drops from 16,182 ha to 6,337 ha (table 4). Mean largest patch size similarly declines to 59,603 ha. As patch sizes drop, measures of total edge density and corrected perimeter-toarea (P/A) perforce increase. Mean total edge density rises from 46.6 m/ha to 68.4 m/ha while mean corrected patch P/A ratio increases from 8.97 to 9.76. Mean shape index decreases from .070 to .043 indicating that not only does wildland shrink and fragment, it also becomes more complex spatially due to low density development perforating the existing wildland matrix. It is important to note, however, that the significant loss of wildland does not mean that large portions of the county have been paved over. While the mean loss of wildland is 23 percent, only 4.5 percent of wildland is actually converted to urban use. For oak woodland land cover types, 40 percent of wildland becomes marginal or urban woodland but only 4 percent is physically lost to development. In other words, areas that once functioned under a more natural state and presumably provided functional habitat for species are degraded, either due to proximity to urban land uses or by isolation from larger patches of contiguous natural vegetation.

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 Table 4 – Landscape metrics for wildlands under present condition and under the General Plan Scenario.

	Present Condition Scenario 500	General Pan Scenario 603
Mean Total Area	161.825 ha	123.267 ha
Mean # of Patches	10.00	19 67
Mean Mean Patch Size	16,182 ha	6.337 ha
Mean Largest Patch Size	159,535 ha	59,603 ha
Mean Mean Shape Index	0.070	0.043
Mean Mean Patch P/A Ratio, Corrected	8.974	9,762
Mean Total Edge Density	46 57 m/ha	68.38 m/ha

# General Plan Alternatives - Increased Development Restrictions

Figures 4b-d and 4g-k show the extents of wildlands for the General Plan alternatives meant to mitigate impacts through increased restrictions to development. The most noticeable aspect of these maps is their similarity to the present General Plan. The north and south patches remain highly separated in all scenarios except for scenario 543 where a few small patches come close to reconnecting the north and south patches. The differences become more apparent when the metrics are examined. All scenarios maintain a greater area of wildland than the General Plan, Scenarios that increase the areal extent of development restrictions (504, 505, 506, 509, 513, 514, 515, 516) generally indicate a decrease in fragmentation (mean number of patches decreases slightly and mean patch size increases slightly) (fig. 3). However, the range for number of patches and mean patch size for these scenarios is high, indicating site-specific sensitivity to placement of development. Scenarios 506 and 516 show the greatest increase in wildland mean total area (126,716 ha and 126,877 ha, respectively) and mean largest patch size (60,906 ha and 61,105 ha, respectively). Scenarios 506, 509 and 516 have the highest mean patch sizes (6,805 ha, 7,021 ha, and 6,952 ha), although 509 has a large range (1,238 ha). These results are consistent with those expected as the scenarios 506 and 516 restrict the largest amounts of land from development (132,694 ha and 133,217 ha, respectively). Patch shape complexity shows little difference in all scenarios as mean shape index remains virtually unchanged as does the mean corrected patch P/A ratio. Mean total edge density declines slightly with 506 and 516 having the greatest decrease (67.02 m/ha and 67.00 m/ha, respectively).

#### General Plan Alternatives - Development Clustering

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For scenarios 507 and 508 we examined the efficacy of clustering development for mitigating wildland babitat loss. For General Plan density classes of Low Density Residential (LDR), we increased adjacency (C) values to 95 percent and 98 percent, respectively. Because the General Plan allowed for a density bonus to the next higher density class, Medium Density Residential (MDR), we also increased the proportion (B) of developed pixels in LDR from 9 to 14 percent for both scenarios. Neither scenario shows a demonstrable increase in wildland habitat retention over the General Plan scenario, while some metrics indicate increased fragmentation. Mean

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Figure 3 – Values of wildland landscape metrics for three iterations of the General Plan scenario (503) and alternatives (504-543). a) mean total area, b) mean number of patches, c) mean mean patch size, d) mean largest patch size, e) mean mean shape index, f) mean mean patch P/A ratio, corrected, and g) mean total edge density.

total area for scenario 507 (123,310 ha) is virtually the same as the General Plan and only slightly higher for scenario 508 (123,831 ha) (fig. 3). Mean largest patch size (507 = 59,502 ha, 508 = 59,847 ha) and mean corrected patch P/A ratio (507 = .044, 508 = .047) show similar behavior while mean total edge density does decrease slightly for 508 (67.39 m/ha). Mean number of patches (507 = 20.67, 508 = 19.0) remains within the range of values of those of the General Plan. Mean patch size actually goes down for 507 (5,979 ha) and remains unchanged for 508 (6,517 ha).

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Figure 4 – Maps of wildland habitat after full buildout for all scenarios. Areas of the same shade are a contiguous patch.

One of the iterations for scenario 508 has the highest shape index of all scenarios (.057) but another iteration of 508 has the second lowest (.035). Neither scenario was effective at maintaining the north-south connection (figs. 4e, 4f).

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Figure 5 – Map of wildland habitat after full buildout for parcel acquisition scenario (543).

# General Plan Alternatives - "Kitchen Sink" and Planned Acquisition

Given that scenarios 504-516 were ineffective at increasing wildland habitat retention over the General Plan scenario or at maintaining the north-south connection, we tested two additional approaches. Scenario 520, dubbed the "Kitchen Sink" scenario, combined all of the most restrictive policies yet tested - 50 m stream buffers, 40 percent slope restriction, oak canopy retention for all developable land regardless of restriction status, plus clustering as per scenario 508 (B = 14 percent, C = 98 percent) (table 1). Scenario 543 takes a completely different approach leaving all original General Plan restrictions intact but expanding the area of non-developable land by restricting select parcels from development in key areas of concern. This scenario represents a planned acquisition approach through the use of easements and/or outright purchase of development rights by the county. We selected several vacant parcels in the Indian Creek canyon area where it crosses Highway 50 between Placerville and Shingle Springs in an attempt to reconnect the northern and southern portions of wildland. In those selected parcels, we only masked development for oak pixels and areas within 50 meters of oak pixels. This left some parcels still potentially developable.

As expected, scenario 520 retains the highest mean total area (127,376 ha) of wildland because it restricts the greatest area of land from development (133,217 ha) (*table 1a*). Mean number of patches (16.67) is the lowest for all scenarios and subsequently mean patch size (7,721 ha) is the highest (*fig. 3*). Mean largest patch size (61,332 ha) is also the highest of all scenarios. Shape complexity does not

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decrease, however. Shape index is the same (.043) as the General Plan scenario and mean corrected patch P/A ratio is the highest of all scenarios (10.74). In contrast, mean total edge density is the lowest of all scenarios (66.1 m/ha). Scenario 520 also does not come close to maintaining the north-south connection (fig. 41).

As we made no attempt to preserve amount, but rather configuration, of wildland, scenario 543 only preserves an average of 1,296 more hectares than the General Plan (mean total area = 124,563 ha) and actually has slightly more average patches (20.0) and a smaller mean patch size (6,229 ha) (fig. 3). However, mean shape index is the second highest for all scenarios (.046) while mean corrected patch P/A ratio is only slightly better than the General Plan (10.013). Mean total edge density is the same as the General Plan (68.57 m/ha). Most importantly, however, scenario 543 comes the closest of all scenarios to maintaining a connection between the northern and southern wildland patches (fig. 5).

## DISCUSSION

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Our study demonstrated that the General Plan for El Dorado County will not allow the county to become one giant suburban subdvision. The General Plan allocates 43.0 percent of private land to development in the 1 unit/5 acre to 1 unit/40 acre density range (LDR and RR). Moreover, only 4 percent of the existing oak canopy will actually be removed by, or converted to, development. However, the configuration of this development is of concern as full buildout could force as much as 40 percent of the County's existing wildland oak woodlands into marginal or urban habitats. When counties are faced with such impacts, a popular mitigation approach is to implement prescriptions in the General Plan that regulate, and/or limit, how and where development can occur (e.g., stream setbacks, slope restrictions, etc.). However, such prescriptions can only apply to development that will undergo discretionary permit review, that is, parcels that have yet to be subdivided to the smallest allowable density in the General Plan. In the case of El Dorado County, 31 percent of vacant land that is open to development in the county (86 percent of parcels) had been subdivided prior to the adoption of the General Plan and is therefore not subject to these prescriptions. These parcels only require ministerial review (i.e., a building permit) before construction can occur. To impose a restriction that would regulate where development could occur in those parcels would require a county-wide ordinance. Our model allowed us to test both alternative General Plan prescriptions and county-wide ordinances. The former had little effect decreasing wildland habitat loss or fragmentation over existing General Plan policies. We attribute this to the large portion of the county not subject to the prescriptions due to prior subdivision. Ordinances showed greater wildland retention over the General Plan but that increase was still small. Scenario 516, the most restrictive ordinance scenario, only preserved 3,610 hectares more wildland than the General Plan and made little difference to patch configuration, shape complexity or edge density. The political expense in implementing ordinance-type solutions would seem to far outweigh the potential ecological benefits to oak woodlands.

Clustered development is a popular prescription proposed by the smart growth community. By holding overall density constant for an area but decreasing the space between structures, less space is scattered between structures which could otherwise serve as habitat and perform other ecosystem functions. The perceived advantages are so great that in order to promote clustering, El Dorado County offers a density

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bonus for clustered development in the Low Density Residential category (5 - 10 acre parcels). We modeled two clustering scenarios allowing densities to increase to the Medium Density Residential level (1 - 5 acre parcels). Neither scenario improved wildland habitat condition over the General Plan and some metrics for scenario 507 (mean number of patches, mean patch size and largest patch size) were actually worse. The increase in density, and therefore the increase in the amount of land developed, offset any benefit that would be gained from clustering. Furthermore, clustering can only occur in *vacant* parcels *open to development with restriction* in LDR. This occurs only in a few small areas in the northern portion of the county.

Scenario 520, the "Kitchen Sink" scenario, employed the strictest policy restrictions we tested, plus clustering. Looking solely at the fragmentation metrics (*fig. 3*), this scenario offers the most improvement in wildland habitat condition over the General Plan. Yet when examining the maps, we did not notice any significant difference in wildland amount or configuration. Most notably, the north-south separation is still very pronounced. Implementing county-wide ordinances which mandate 50 m stream buffers, 40 percent slope restrictions and oak canopy retention on all undeveloped parcels, plus requiring clustering in LDR, is highly unrealistic, not to mention, very politically expensive. Again, we contend that the political costs of such a scenario are probably greater than the ecological benefits.

Alternatively, we examined a limited parcel acquisition, or easement, strategy (scenario 543) for areas of concern which removes key parcels from the potential development landscape. One such area is the Indian Creek Canyon region. Here, a stringer of oak woodlands presently connects the northern and southern wildland patches. Although this scenario did not actually maintain the connection, several small patches do extend through the area indicating that the concept has the potential to maintain this critical corridor. This area of the county is highly desirable for development, therefore making this scenario potentially fiscally expensive. However, unlike the ordinance approach, an acquisition approach would encounter fewer stakeholders directly and would offer owners compensation for the loss of development rights on their property. Involving private conservation groups or land trusts could greatly reduce costs to the public sector.

Rural residential development erodes habitat quality much more than habitat extent, requiring a more nuanced approach to assessing impacts than when natural habitats are simply removed or paved over. At these low densities, we were unable to use polygons of housing density to determine the relationship of naturalness to density. At certain scales, the landscape still looks much as it once did. Rather, we modeled the real impacts of site alteration which required an entirely unique set of variables and characteristics such as determining the exact footprint of development (e.g., Do lightly used roads count? Do outbuildings?) and establishing the sphere of influence from a structure (e.g., How far from the structure is natural vegetation disturbed? How far does sound travel? What impact does it have? What influence do pets have and at what distance?). We can easily adjust these variables in our model to examine their sensitivity and ability to assess other issues besides wildland connectivity such as impacts to specific species habitat requirements, watershed degradation from increased sediment generation, and changes in wildfire probability due to vegetative fuel alteration. Most people can agree that high density urban and suburban development do not provide much high quality habitat for most species, but seldom can stakeholders, land managers, public officials, or even scientists agree on the thresholds or the degrees at which rural development begins to impact the

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landscape. As more of the landscape of California transitions from large extents of wilderness owned by relatively few private individuals to a landscape divided up amongst thousands of owners regularly dotted with houses every few thousand feet, understanding these impacts and enacting policies that are effective, fair, and feasible become ever more important and challenging.

# FUTURE DIRECTIONS

One aspect of development and conversion of natural land cover that we have not addressed is agricultural expansion. In El Dorado County this primarily involves vineyards. Agricultural expansion has the potential for far greater impact to habitat extent and connectivity than residential development as a greater area of land in larger contiguous patches is generally more greatly disturbed. Agricultural expansion can also be more difficult to predict. Heaton and Merenlender (2000) have developed a model to determine site suitability for vineyard expansion in Sonoma County which could be adapted for use in El Dorado County.

More investigation of the effects of riparian corridors on habitat connectivity is needed, including the effectiveness of stream setbacks and the development of methods to characterize linear features, as opposed to the two dimensional features analyzed here.

Better knowledge of the likelihood of development would enhance our ability to tailor solutions to specific areas of concern. The incorporation of economic models of development such as Johnston's UPLAN (2001) and Landis's CURBA (1998a, 1998b) would provide more realistic future scenarios as well as the ability to model development in stages over time rather than only at full buildout as we have done. Implementing other constraining factors to development such as water availability and habitat conservation plans could also improve our predictions of future development.

### CONCLUSION

Fine-grained spatial models with highly detailed datasets are required for evaluating impacts of development on ecological, economic, or social systems at the local level. Such large-scale, high-resolution models also enable stakeholders to more easily relate the data portrayed on maps to their perception of the landscape in which they live. However, most site-specific models of development have been created for dense urban areas, using complex economic formulas of land value and empirically derived patterns of past development trends. These models prove less than reliable at predicting low-density development of the rural ranchette variety which is now so prominent in the Sierra foothills and which has such great impact on habitat quality. We have developed a model that is both fine-grained and capable of predicting potential rural ranchette development and its impacts. Moreover, by having a tool that can operate under various assumptions and constraints, we can actually test a proposed solution's efficacy at achieving a desired goal, which in this case is maintaining wildland connectivity. We have also used our model of predicting footprint of development to assess impacts of wildfire on future structure loss. Our explicit model of development could prove useful for studies of water quality and cumulative impacts for watersheds by incorporating elements such as

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sediment generation from road development, nutrient loading from septic systems, and conversion of natural land cover to impervious surfaces.

Existing land tenure (the bistoric parcelization of land) limits effective control of development by General Plan prescriptions that are only applicable when a parcel requires subdivision before development, thus leaving solutions that require large expenditures of political capital such as ordinances or downzoning. The political expense in implementing such solutions would seem to far outweigh the potential benefits. 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.

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