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Oak Woodland Management Plan
Initial Study/Negative Declaration Comments
Attn: Monique Wilber
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RE: Oak Woodland Management Plan Initial Study/Negative Declaration

To Whom It May Concern,

I am submitting comments on the Oak Woodland Management Plan Initial Study/Negative Declaration (OWMP IS/ND) prepared by El Dorado County (County). My concerns about the Management Plan include the inadequacy of the assessment of oak woodland habitat within the county, the loss of oak woodland habitat due to the mitigation only of oak tree canopy cover removal rather than acreage of habitat lost, and the lack of planning for maintenance of habitat connectivity, especially along the Highway 50 corridor.

My qualifications for submitting informed comments include my educational background, work experience as a professional botanist, familiarity with oak species and oak dominated habitats within El Dorado County, and participation in County planning task forces, including that charged with the development of guidelines for the protection and conservation of oaks and oak woodland habitat. I hold a bachelor's degree in biology from Humboldt State University and a master's in biology from California State University, Sacramento, for which I focused on plant ecology and conducted research on the ecology of valley oak (*Quercus lobata*) at Cosumnes River Preserve. I am presently a doctoral candidate in restoration ecology at University of California, Davis. I have worked as a consulting botanist in El Dorado County for almost 20 years, and am employed as professor of biology at Sacramento City College (SCC), where I teach several courses, including Field Botany, California Oaks, and Field Methods in Ecology, courses taken by students in partial fulfillment of requirements for SCC's Field Ecology Certificate.

The original intent of the County General Plan was to maintain oak woodland habitat, including connectivity of habitat for wildlife corridors, and to mitigate for loss of habitat, not just for individual oak trees, as stated in General Plan Objective 7.4.4. Oak woodland habitats provide resources beyond the area covered by the *canopies* of individual oak trees. Oak woodlands as habitats include not only the living oaks and their canopy shadows, but also dead snags and associate plant species, including understory shrubs and

oak woodland-scrub habitats, where oak trees are less dense, and more cover is provided by shrubs (California Partners in Flight 2002). All four of these bird species are found living in the oak woodland habitats of El Dorado County. Further, Nuttall's Woodpecker, Yellow-billed Magpie, and California Towhee have different essential habitat element requirements. Nuttall's Woodpecker nest in primary cavities (cavities that the birds excavate themselves), and requires both living trees and snags, while Yellow-billed Magpie requires living trees and riparian (stream-side) areas, and California Towhee requires shrub cover and riparian areas (California Partners in Flight 2002).

Mammal species of oak woodlands also differ in habitat requirements. Cavities in the standing trees of woodlands are used for dens and nests by raccoons and Western Grey Squirrel, while Gray Fox and Bobcat utilize dense scrub oak chaparral as shelter from high summer temperatures (Pavlik and others 1991).

Wildlife species that require more widely spaced oak habitat – with lower canopy coverage – will not be able to survive in oak habitat with higher canopy coverage because such replacement habitat will not offer the same mix of shelter and prey opportunities. The OWMP appears to allow for the replacement of one oak woodland habitat – such as blue oak woodland – with another type such as montane-hardwood woodland, which is more prevalent in the County and occurs at higher elevations. Higher elevation montane oak habitats typically have higher canopy covers, but provide different habitat for different wildlife species. For wildlife species discussed above that require lower elevation blue oak woodlands, the loss of such habitat cannot be replaced by preserving higher elevation montane hardwood systems. In my opinion, any proposal to replace lower elevation blue oak woodlands or blue oak-foothill pine habitats with higher elevation montane oak habitat has the potential for significant impacts to wildlife that depend on these lower elevation oak habitats.

In addition to the total area and diversity of oak woodland habitats in El Dorado County, wildlife populations also require corridors for movement and migration. Integrity of oak woodland habitats, as required by General Plan Policies, includes the necessity of connectivity for wildlife corridors, and for ecosystem values and aesthetics. The map of Priority Conservation Areas (PCAs) (Figure 1, Initial Study/Negative Declaration) exhibits troubling gaps, especially north to south. If no PCAs are identified along the Highway 50 corridor, much total area, diversity and connectivity, and thus, integrity, of oak woodland habitats will be lost. For example, Mule Deer rely on the cover provided by oak woodlands and other habitats for seasonal migrations. The oaks of woodlands also provide essential food and resting places for bats during their long-distance spring and fall migrations (Pavlik and others 1991). Therefore, PCAs that are contiguous from north to south are critical, since loss of the connectivity of these wildlife corridors may result in loss in populations dependent upon them for successful migrations.