

B53 LINCOLN WAY, SUITE #208 AUBURN, CALIFORNIA 95603 T 530.887.8500 F 530.885.8372

#### **MEMORANDUM**

**To:** Shawna Purvines, Principal Planner, El Dorado County

From: Cathy Spence-Wells, Principal

**Subject:** Biological Resources Policy Update Decision Points and Timeline

Date: December 31, 2014

Attachment(s): Scope of Services – New Economics and Advisory

#### 1.0 INTRODUCTION AND BOARD DIRECTION

The purpose of this memo is to outline for the Board the steps needed to update the General Plan biological resources policies based on the direction staff has received to date. In considering the potential biological resource policy updates, the Board has reviewed the History/Background memo on the biological resource policies and the Policy Options memo outlining the broad alternatives for updating the policies. Both memos were presented at the July 28, 2014 Board of Supervisors hearing. The History/Background memo outlines the County's General Plan development history and key issues in implementing the current General Plan. The Policy Options memo outlines four major approaches for the General Plan Biological Resources Policy Update. Both those documents and the presentations made to the Board are available on the County's website at

http://www.edcgov.us/Government/LongRangePlanning/Environmental/BioPolicyUpdate.aspx.

At the Board of Supervisors hearing on October 7, 2014, the Board directed staff to proceed with Policy Option 3 (Mitigation/Conservation option). Under Policy Option 3, the intent is to amend the General Plan policies to redefine the County's program for management of and mitigation for biological resource impacts. This option includes reviewing and updating the Oak Woodland Management Plan (OWMP) and possibly updating the Priority Conservation Areas (PCAs), while eliminating the Integrated Natural Resources Management Plan (INRMP). The revised General Plan policies, OWMP, PCAs, and Important Biological Corridors (IBCs) would comprise the County's resource management strategy. Under this option, the revised policies and implementation measures would lay out the requirements for analysis and mitigation of impacts, define the roles of project developers and the County in implementing mitigation, and prioritize mitigation opportunities.

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To expedite preparation of the revised policies, implementation measures, and OWMP, the Board directed that public outreach will take place at Board meetings, similar to the approach being used for the Targeted General Plan Amendment and Zoning Ordinance Update (TGPAZOU). In addition, there was considerable discussion at the October meeting regarding the timely implementation of the OWMP, specifically related to Option B of General Plan Policy 7.4.4.4 (oak woodland in-lieu fee option). At the November 21, 2014 Board hearing, further direction was given to ensure the updated OWMP provides for re-establishment of the in-lieu fee program. The Board further directed, at the December 7, 2014 Board hearing, that staff should rely on the approach, methodology, format, and structure of the existing OWMP to the extent feasible, with updates and revisions as necessary to reflect current conditions and ensure compliance with state law.

#### 2.0 MITIGATION/CONSERVATION APPROACH OVERVIEW

As described in the History/Background memo, the County's goal for the General Plan Biological Resources Policy Update is to develop clear, easy to interpret, self-implementing policies that define what resources are covered and the types of development activities governed by the policies. The Board has determined that Policy Option 3, the mitigation/conservation approach outlined in the Policy Options memo, will best provide the County with policies and implementation measures that will work in concert with each other to provide the County with a feasible, effective, and comprehensive program for mitigating biological resource impacts anticipated under the General Plan. The policies will clearly define mitigation options that comply with applicable state and federal laws and meet the County's resource management goals. The policies will also respond to the unique issues facing El Dorado County, including the development potential along the Highway 50 corridor and associated effects on habitat connectivity in this area and the need to balance economic development and resource conservation/protection in the County. A primary goal of this policy update effort is to expand the options for oak woodland mitigation by re-establishing the County's Oak Woodland Conservation Fund In-Lieu Fee option. The following sections summarize the components of the mitigation/conservation approach related to oak resources and other special-status biological resources as described in the Policy Options memo. The decision-points identified in Section 3 correspond to the key points in the approaches summarized below.

# 2.1 Oak Woodland General Plan Policies and Oak Woodland Management Plan

As presented in the Policy Options memo, the mitigation/conservation approach for oak resources (Policies 7.4.5.1, 7.4.5.2, 7.4.4.4 and 7.4.4.5 and the OWMP) is anticipated to involve the following:



- Update and amend the policies to retain and clarify requirements related to the OWMP and PCAs
- Update policies to create a clear distinction between which projects would be subject to oak tree impact mitigation and which would be subject to oak woodland mitigation
- Update policies to clarify and define the method of oak woodland measurement (woodland area or canopy cover area), to be used consistently for impact calculations and mitigation area determination
- Define mitigation options for <u>oak woodland</u> impacts, to be consistent with PRC 21083.4 (Senate Bill 1334 (Kuehl bill)), possibly including tree planting, conservation, and/or inlieu fee payment
- Define mitigation options for <u>oak tree</u> impacts, possibly including tree planting, onsite retention/protection, and/or in-lieu fee payment
- Provide for developer planting/monitoring/reporting to occur and define the County's process for verifying compliance with mitigation

Under this approach the County would be responsible for managing mitigation fees, acquiring/managing conservation lands or easements, allocating mitigation funds to a local land trust or conservancy for oak mitigation/preservation projects, or a combination thereof. Environmental review for individual projects would rely on requirements for project-specific mitigation measures included in the revised General Plan policies and/or the OWMP.

# 2.2 Other General Plan Biological Resource Policies

As presented in the Policy Options memo the mitigation/conservation approach for special-status resources (Policies 7.4.2.8, and 7.4.2.9) is anticipated to involve the following:

- Update policies to omit the requirements for the INRMP as currently envisioned, but retain and clarify the requirements for PCAs and IBCs, and possibly other important ecological areas identified by the PAWTAC (e.g., aquatic environments, important habitat for migratory deer herds, Pine Hill areas, valley oak woodland, etc.)
- Update policies to reflect the County's General Plan EIR definition of special-status vegetation communities and species
- Update policies to create clear instructions for mitigating impacts to special-status resources and consider an implementation measure requiring the County to create an ordinance outlining mitigation requirements specific to each category of special-status resources (e.g., vegetation communities, plants, wildlife)



- Update policies to address wildlife movement, possibly through requirements and standards (i.e., sizing and placement) for undercrossings of future 4- and 6-lane roadway projects
- Establish an implementation program to provide mitigation assistance by requiring the County to maintain a database of willing sellers within PCAs and IBCs
- Establish specific standards for IBCs, such as minimum parcel size, contiguous areas, and minimum corridor widths

This approach would comply with state and federal law and provide defensible policies. The policies and implementation measures would define special-status biological resources, establish thresholds for determining the significance of individual project impacts, and identify mitigation strategies. This would allow individual property owners to better understand the County's requirements. Further, providing for the County to maintain a database of willing sellers would facilitate developers' identification of mitigation opportunities.

#### 3.0 BIOLOGICAL RESOURCE PROGRAM KEY DECISION POINTS

Staff will be presenting information and several questions to the Board at public meetings over the first few months of 2015. The direction the Board provides at these meetings will inform preparation of the draft policies, OWMP and implementation measures. The policy direction needs and timeframe for decision-making are outlined in the following sections. The initial Board meeting (January 13, 2015) is planned to discuss the proposed approach and timeline, set the Board calendar for the biological resources policy update project, and provide direction for the possible update to the oak woodland in-lieu fee methodology (discussed below in Section 3.1.1). Subsequent meetings tentatively scheduled for the last Mondays in January (January 26, 2015), February (February 23, 2015), and March (March 30, 2015) will be special Board meetings focused on the project. The following sections present more detail regarding Board decision points to be considered during these meetings. This memo provides a full discussion of the January 13 decision-point and lesser detail for future decision-points. Additional details will be provided in preparation for those future hearings (no less than one week prior to the meeting), in part based on any preliminary Board discussion of those items and direction received at each meeting. As discussed in Section 4.0 below, the project timeline allows 5 months for Board decisions and public input, and meeting the decision point schedule presented below will be critical to timely completion of the General Plan Biological Resource Policy Update process.

### 3.1 Decisions for January 2015 Board Meetings

#### 3.1.1 Board Meeting – January 13, 2015

During the Board meeting on January 13, 2015, the approach, decision-points, and timeline presented in Sections 2.0 through 4.0 will be presented to the Board for approval. This meeting will also be used to set the Board calendar for the biological resources policy update project. Additionally, the following decision point will be presented to the Board for direction:

# 1. Determine whether the current in-lieu fee amount should be retained or re-analyzed and updated.

- Options: Rely on existing methodology with update of fee amount based on current property values or prepare an AB 1600 Fee Nexus Study and revise in-lieu fee with updated methodology, assumptions, and property values.
- Analysis: The Board has directed that the General Plan and OWMP provide the opportunity to mitigate oak resource impacts via an in-lieu fee program (Option B). This was included in the 2008 OWMP through the OWMP Conservation Fund In-Lieu Fee, which required that developers pay a fee to provide compensation for both habitat loss and habitat fragmentation impacts due to development. The County would use the Conservation Fund to acquire and manage lands within the PCAs in implementation of the OWMP. As provided in General Plan Policy 7.4.4.4, mitigation through the Conservation Fund was required at a 2 to 1 ratio. The County has been prevented from using the in-lieu fee program as a result of the OWMP lawsuit, wherein the court found that the County had not completed sufficient environmental review of the OWMP and fee program, stating that the Program EIR for the General Plan (2004) did not "set the fee rate, how the acreage subject to the option B fee rate should be measured, or how the off-site oak woodland losses would be mitigated by the fees."

It is expected that the County would adopt the OWMP and Conservation Fund by ordinance. Typically, General Plan policies provide guidance for achieving the County's goals; management plans (e.g. the OWMP) provide the necessary analysis, background material, and data; and ordinances provide enforceable measures in clear language. By creating an ordinance, oak resource impact analysis and mitigation requirements can be applied consistently and uniformly to all projects.

To adopt the OWMP and Conservation Fund by ordinance, the Conservation Fund and In-Lieu Fee must meet the requirements of the Mitigation Fee Act



(commonly referred to as AB 1600). AB 1600 requires that development fees must be related to the impact that the development would cause and the fee amount must be reasonably related to the actual cost of the service being provided by the public agency. In this case, the County would be providing the service of acquiring and managing land under conservation easements for the purpose of preserving and managing oak resources. To comply with AB 1600, the County must identify all sources and amounts of funding anticipated to be used to in the oak conservation program and provide a mechanism by which those costs can be equitably applied to individual development projects that would benefit from the mitigation opportunities provided in the OWMP.

The 2008 OWMP Fee was determined based on a detailed assessment of costs associated with acquisition and management of conservation easements. These calculations included consideration of property values, costs to acquire the easements, biotic surveys, habitat management, reporting and monitoring, and operational considerations. However, at a minimum, these fee calculations will require adjustment and refinement to ensure they comply with AB 1600. The data does not appear to be consistent with respect to the total acreage of land included in the program (for example, OWMP Table 5 indicates that the PCAs include 66,053 acres, while the fee calculations shown in Appendix B to the OWMP appear be based on a total of 120,000 to 125,000 acres). Further, the fee calculations assume that canopy coverage on the impacted land will be the same as on the mitigation land. In other words while the policies on which the OWMP and Conservation Fund are based require that impacts and mitigation be evaluated based on canopy coverage, the In-Lieu Fee is based on calculations of impact and mitigation by land acreage.

Through preparation of an AB 1600 Fee Nexus Study as recommended, the County would have the data necessary to demonstrate the effectiveness of the OWMP Conservation Fund at mitigating impacts to oak resources on an individual project level as well as cumulatively throughout General Plan implementation.

A Scope of Work from New Economics and Advisory is attached to this memo. The Scope of Work provides a suggested approach to recalculate an in-lieu fee in a manner that is consistent with AB 1600 and will provide the data necessary to support this General Plan policy and OWMP update and the associated EIR. If the County determines that an update to the fee program is appropriate, the work will to commence quickly to match the overall project timeline.

It is noted that while the AB 1600 Fee Nexus Study and in-lieu fee recalculation are not specifically included in Dudek's contract, Dudek can accommodate the additional costs associated with the New Economics and Advisory scope of work under our contracted Supplemental Task. However, this would require all of the Supplemental Task budget, leaving none to cover any other incidental tasks that may arise as additional necessary components of the work program.

 <u>Recommendation:</u> Prepare an AB 1600 Fee Nexus Study to provide the legal and financial basis for the OWMP Conservation Fund In-Lieu Fee be defining the methodology, assumptions, and property values that underlie the in-lieu fee.

## 3.1.2 Board Meeting – Tentatively Scheduled for January 26, 2015

The following decision points will be presented to the Board for direction during the tentatively scheduled January 26, 2015 Board meeting.

- 2. Determine which method of oak woodland measurement (woodland area or canopy cover area), would be used for impact calculations and mitigation area determination.
  - Options: Use oak canopy or oak woodland as a unit of measurement for determining oak resource impacts and quantifying mitigation requirements. Note that an additional decision point (#4) regarding oak resource impacts and mitigation for smaller projects is tentatively scheduled for a February Board hearing.
  - Analysis: Initial information regarding this decision point was presented to the Board on July 23, 2014. The following summarizes the information presented at the Board meeting:
    - Oak canopy represents the area of ground directly beneath the dripline (or canopy edge) of an oak tree and in areas with dense tree cover, driplines may overlap. Using oak canopy as a unit of measurement excludes portions of an oak woodland (other plant species, gaps) but is something that is more easily mapped and understood by the public.
    - Oak woodlands encompass some of the areas between trees and may include other associated tree species. Based on the California Fish and Game Code, an oak woodland is defined as "an oak stand with greater than 10% canopy cover." There is often a misconception that if a parcel has 10% canopy cover then the entire parcel is an oak woodland. However, this is not necessarily the case as the 10% canopy cover



definition applies to the stand or grouping of trees, not the parcel boundary.

 A comparison of conceptual oak canopy and oak woodland mapping is presented in Figure 1, which was presented to the Board on July 23, 2014.

The County's Interim Interpretive Guidelines for Policy 7.4.4.4 clarify that oak canopy is to be used as the unit for measuring oak woodland habitat and determining mitigation requirements. Oak canopy may be more easily identified and mapped, while delineation of oak woodlands requires more understanding of the various components that constitute an oak woodland. The oak canopy measurement is tree-focused and does not consider other factors that contribute to wildlife habitat value, which are considered in oak woodland measurements. Wildlife habitat values considered in oak woodland measurement include tree species composition, understory vegetation (type and location), the structure and distribution of trees within a stand, and food and shelter sources for different wildlife species. Using oak woodland as the unit of measurement would retain consistency with state-level oak woodland regulations (Kuehl Bill), allow for mitigation of the same woodland type (like for like), and eliminate the potential for mitigating project-related impacts twice (once for trees and once for wildlife species that use oak woodlands for habitat).

- <u>Recommendation:</u> Using oak woodland as a method of measurement is the recommended approach as it: 1) retains consistency with state regulations (Kuehl Bill); 2) allows for like-for-like mitigation based on type of oak woodland impacted; 3) considers habitat value of oak woodlands; and 4) eliminates the potential need to mitigate project-related impacts twice (once for trees (canopy) and again for habitat (woodland)).
- 3. Determine whether to require undercrossings for future 4- and 6-lane roadway projects to provide for wildlife movement, and if so, determine specific standards for undercrossings (i.e., size, location).
  - o <u>Options:</u> Adopt criteria defining where roadway undercrossings would be required or determine that undercrossings are not appropriate.
  - O Analysis: The efforts undertaken by the County to develop the INRMP included a study to identify wildlife movement corridors within the County. Overlaying these corridors on maps of existing and planned high-volume roadways (such as 4- and 6-lane roadways) allows for identification of areas where the roadways could form a barrier to wildlife movement and have an adverse effect on established wildlife movement patterns. Generally, roads that cross through or

along wildlife movement corridors experience higher than average animal mortality rates and also present higher hazards for motorists.

There appear to be a few locations where future 4- and 6-lane roads may cross the Important Biological Corridors that were mapped during Phase I of the INRMP. These may be locations where undercrossings are warranted. Dudek will provide mapping and analysis of these locations prior to the January 26 Board hearing to inform this discussion. Requiring that new or widened roads include undercrossings to facilitate wildlife movement may reduce the potential for significant adverse effects and may support the County's efforts at minimizing the effects of habitat fragmentation by maintaining connections between large areas of natural habitat.

 Recommendation: Adopt criteria defining where roadway undercrossings would be required, if necessary, to minimize adverse effects on wildlife movement and roadway safety.

### 3.2 Decisions for Tentatively Scheduled February 2015 Board Meeting

It is anticipated that the Board will be asked for direction on the following decision points during the tentatively scheduled February 23, 2015 Board meeting.

- 4. Determine if a two-tiered oak mitigation approach where smaller projects mitigate for tree impacts and larger projects mitigate for oak canopy or woodland impacts is necessary and if so determine the appropriate threshold.
  - Options: Options for this decision include whether to establish a two-tiered approach for oak mitigation. If the two-tiered approach is supported, a threshold for determining which projects are subject to *oak tree* mitigation and which are subject to *oak canopy or woodland* mitigation (as discussed in Decision Point #2) would need to be determined. Leaving the policy language unchanged would mean that some individual projects potentially would require both oak canopy/woodland <u>and</u> oak tree mitigation.
  - Analysis: The intent of this decision-point is to consider a framework that could allow smaller parcels and projects to mitigate impacts at a tree level (e.g., based on diameter-inches of trees removed) and larger parcels and projects to mitigate impacts at a canopy or woodland level. General Plan Policy 7.4.4.4 identifies that oak woodland mitigation applies to parcels that (1) are over an acre and have at least 1 percent total canopy cover or (2) are less than an acre and have at least 10 percent total canopy cover by woodlands habitats. General Plan Policies 7.4.5.1



and 7.4.5.2 address oak tree removal permitting and mitigation requirements for discretionary projects. However, the current policy language does not preclude one project from needing to mitigate under both Policy 7.4.4.4 (oak woodlands) and Policies 7.4.5.1 and 7.4.5.2 (oak trees).

In order to separate the mitigation requirements, a threshold could be established that clearly defines which approach a project would need to follow. Threshold determination may be based on parcel size, on-site oak woodland acreage, a combination of these factors, or factors determined by the Board. An example of this approach is currently employed in neighboring Placer County, where projects with less than 2 acres of oak woodland address impacts at a tree level and those with greater than 2 acres of oak woodland address impacts at a woodland level. To assist in decision-making, recommendations for thresholds will be presented at the February Board meeting.

<u>Recommendation:</u> Defining a threshold for determining which project or parcels are subject to analyzing impacts at a tree level or at a woodland level is the recommended approach as it: 1) eliminates the potential need for projects to mitigate twice; 2) does not put oak canopy or woodland mitigation requirements on projects that may only be impacting one or two trees; and 3) provides for mitigation that is more consistent with the scale of the impact.

# 5. Determine whether exemptions to oak woodland impact mitigation requirements included in the current OWMP and General Plan biological resource policies shall remain and/or be revised.

- Options: Options for this decision point include providing exemptions to oak resource mitigation for specific project types/actions consistent with what is currently provided, revise/refine the list of project types/actions that are exempt, or eliminate exemptions.
- Analysis: Exemptions for oak woodland mitigation requirements are currently provided for agricultural activities, fire safety, affordable housing, and public road and public utility projects. Affordable housing and agricultural exemptions are provided for in state-level oak woodland regulations (Kuehl Bill). Exemptions for fire safety are linked to the requirements for maintaining defensible space around habitable structures in state responsibility areas (Public Resources Code (PRC) 4291). Public road exemptions are intended to facilitate projects that are necessary to increase capacity, protect the public's health, and to improve the safe movement of people and goods in existing public road rights-of-way. Public utility exemptions are intended to apply to state-level vegetation clearance

requirements for transmission lines (California Public Utilities Commission General Order (GO) 95). For the February Board meeting, Dudek will provide additional descriptions of the exempt activities and any recommendations regarding refinement or revisions of those exemptions.

<u>Recommendation:</u> Retaining the existing exemptions is the recommended approach as it: 1) is consistent with the Kuehl Bill (for affordable housing, agricultural production); 2) does not conflict with other state-level fire safe (PRC 4291) or utility line clearance requirements (GO 95); and 3) is intended to facilitate safe transportation.

#### 6. Determine whether Priority Conservation Areas (PCAs) will be updated.

 Options: Options for this decision include updating the PCAs or leaving them as defined in the 2008 OWMP.

<u>Analysis:</u> The PCAs delineated under the 2008 OWMP relied on the future development of the Integrated Natural Resources Management Plan (INRMP) to address connectivity between PCAs, north-south connectivity across Highway 50, and the potential role of oak woodland areas less than 40 acres in maintaining connectivity between larger expanses of oak woodlands. As the INRMP will not be completed under this policy option, the County may need to identify another mechanism to address wildlife habitat connectivity.

Another important consideration in refining the PCAs is to ensure that sufficient acreage is available in the PCAs for mitigation of oak woodland impacts expected based on General Plan projections. A comparison of anticipated oak woodland impact acreage and available oak woodland acreage, by woodland type, in the PCAs would be an important analysis in updating the PCAs. To assist in decision-making, a comparison of anticipated oak woodland impacts under the General Plan and those identified under the current PCAs will be presented at the February Board meeting.

- <u>Recommendation:</u> Updating the PCAs is the recommended approach as an update could: 1) better provide for availability of oak woodland habitats suitable for conservation; and 2) allow for consideration of the habitat connectivity value of the PCAs in the absence of the INRMP.
- 7. Determine appropriate mitigation requirements specific to each category of specialstatus resources (e.g., vegetation communities, plants, wildlife) for inclusion in policies.



- Options: In preparation for the February Board meeting, Dudek will identify specific options for each category of special-status resource.
- O Analysis: Dudek assumes that the categories of special-status resources will be the same as those defined in the County's General Plan EIR. Based on Board direction, Dudek will provide draft General Plan policies that define County mitigation requirements specific to each category.
- Recommendation: In preparation for the February Board meeting, Dudek will identify specific recommendations for the mitigation requirements for each category of special-status resource.
- 8. Determine specific standards for the establishment of IBCs, such as minimum parcel size, contiguous areas, and minimum corridor widths.
  - Options: In preparation for the February Board meeting, Dudek will identify specific options for standards that could be used to define IBCs throughout the County.
  - Analysis: Dudek will provide a discussion of the intent of the IBCs and the minimum corridor characteristics that could support the County's goals for IBCs, habitat connectivity, and wildlife movement.
  - <u>Recommendation:</u> In preparation for the February Board meeting, Dudek will identify specific recommendations for standards that could be used to define IBCs throughout the County.

## 3.3 Decisions for Tentatively Scheduled March 2015 Board Meeting

It is anticipated that the Board will be asked for direction on the following decision points during the tentatively scheduled March 30, 2015 Board meeting.

- 9. Determine which important ecological areas identified by the PAWTAC (e.g., aquatic environments, important habitat for migratory deer herds, Pine Hill areas, valley oak woodland, etc.) to include with the PCAs and IBCs as we develop a conservation strategy.
  - Options: In preparation for the March Board meeting, Dudek will identify specific options for important ecological areas that could be included with the PCAs and IBCs.
  - O Analysis: This decision would follow the Board decision regarding whether the PCAs will be updated with respect to oak woodlands. Dudek will provide an evaluation of the degree to which the oak woodland PCAs coincide with the



important ecological areas and meet the County's goals for management of special status resources. Dudek will identify the degree to which the PCAs offer protection to each category of special status resource.

 <u>Recommendation:</u> In preparation for the March Board meeting, Dudek will identify specific recommendations for important ecological areas that could be included with the PCAs and IBCs.

# 10. Define the County's requirements for maintaining a database of willing sellers within PCAs and IBCs and/or other important biological areas.

- Options: In preparation for the March Board meeting, Dudek will identify specific options for the General Plan policy requirements related to the County's maintenance of a database of willing sellers within the PCAs and IBCs and/or other important biological areas.
- O Analysis: The database of willing sellers is seen as a critical component to facilitating identification of appropriate mitigation land for acquisition, either by developers or by the County in implementation of the OWMP. The General Plan policy and associated implementation measures would define the key characteristics of this database program.
- <u>Recommendation:</u> In preparation for the March Board meeting, Dudek will identify specific recommendations for the General Plan policy requirements related to the County's maintenance of a database of willing sellers within the PCAs and IBCs and/or other important biological areas.

#### 4.0 TIMELINE AND MILESTONES

Preparation of the revised policies, OWMP and EIR could be completed within approximately 17 months, allowing 5 months for Board decisions and public input with concurrent preparation of the OWMP and updated biological resources policies, and 12 months to prepare and process the EIR. The sections presented below summarize the critical milestones necessary to meet this schedule, and a master schedule is provided at the end of this section.

### 4.1 Biological Resource Policies and Oak Woodland Management Plan

The following timeline and milestones has been developed for preparation of the revised biological resource policies and OWMP:

• January – March 2015: Board meetings for decision-making on policy issues



- May 2015: Draft policy language and OWMP presented to the Board for review and comment
- June 2015: Final draft policy language and OWMP presented to Board, to be used in preparation of the EIR
- May 2016: Final policy language and OWMP completed (concurrent with Final EIR)

#### 4.2 Environmental Impact Report

The following timeline and milestones has been developed for preparation of the Environmental Impact Report (EIR) for the biological resource policies and OWMP. The draft General Plan policies and draft OWMP would form the basis for the project description to be used in the EIR. Thus, this timeline is integrated with the timeline for the policy updates:

- April 2015: Administrative Drafts of Initial Study and Notice of Preparation
- June 2015: Notice of Preparation distributed
- July 2015: Scoping Meetings held
- September 2015: Administrative Draft EIR prepared
- November 2015: Draft EIR prepared
- November/December 2015: Public meetings on Draft EIR held
- January to March 2016: Administrative Final EIR prepared
- May 2016: Final EIR prepared



**Table 1. Biological Resource Policy Update Timeline** 

Task	2015													2016				
	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	
Biological Policies/OWMP																		
Board meetings for decision- making/public input																		
Draft policy language/OWMP																		
Final draft policy language/OWMP																		
Final policy language/OWMP																		
Environmental Impact Report																		
Administrative Drafts of Initial Study and Notice of Preparation																		
Notice of Preparation																		
Scoping Meeting																		
Administrative Draft EIR																		
Draft EIR																		
Public meetings on Draft EIR																		
Administrative Final EIR																		
Final EIR																		

