



CALIFORNIA
NATIVE PLANT SOCIETY

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Board of Supervisors
El Dorado County
330 Fair Lane
Placerville, CA 95667

LATE DISTRIBUTION
DATE 4/25/2019
BOS 4/30/2019

April 25, 2019

Re: Comments on Agenda Item 19-0630 on the April 23, 2019 Agenda, Relating to the Proposed Vegetation Management Ordinance.

To the Board of Supervisors:

We have reviewed the draft of the Vegetation Management Ordinance that was posted on the BOS website for Agenda Item 19-0630 and have the following comments:

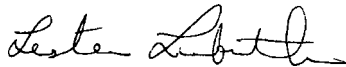
We continue to support your interest in creating an enforcement process to ensure that fire safe clearing, in accordance with California Public Resources Code Section 4291, occurs within El Dorado County.

We feel that it is inappropriate and unnecessary to include locally native plants in the definition of "Weeds" (Section 2: Definitions, R. Weeds). In particular, the definition, under this section, item 2. includes sagebrush, chaparral and manzanita. These native plants are not weeds in the common use of the term, and their inclusion in the definition allows for the misapplication of the intent of requirements to create and maintain defensible space around residential structures at the expense of the native plants that make our County so rich. These native plants are already included in the definition of "Hazardous Vegetation" (Section 2; H.), or could be easily included. When properly maintained, pruned and spaced, they can be a highly appropriate part of our natural landscape while still providing defensible space around residences and other critical structures.

We also note that several policies in the El Dorado County General Plan direct landscaping with drought tolerant native plants (such as Policies 7.3.5.1 and 7.3.5.2). Policy 7.3.5.1 specifically states where the use of drought-tolerant native plant species is feasible, they should be used instead of non-native plant species. Native species like sagebrush and manzanita, as well as those associated with chaparral plant communities are drought tolerant and often used in water wise landscaping. Defining such species as "weeds" in this Ordinance while encouraging their use in other existing policies will lead to confusion, frustration and misinterpretation. We ask that you remove the terms, "sagebrush", "manzanita" and "chaparral" from the definition of "weeds" to improve clarity and consistency with other adopted policies.

Thank you for your consideration of our comments. As an organization and residents of El Dorado County, we are invested in both protecting people and the natural resources in our County. Please contact me if you have any questions about these comments (530-622-5306; lesterlubetkin@gmail.com).

Sincerely,

A handwritten signature in cursive script, appearing to read "Lester Lubetkin".

Lester Lubetkin
Co-Chair, Conservation Committee
El Dorado Chapter, California Native Plant Society

CC: Creighton Avila, CAO Office