



El Dorado County
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Supervisor, District III

DATE: June 21, 2010
TO: Board of Supervisors
RE: **INRMP BOS #31 on 06-22-10 Agenda**

My review of the proposed INRMP mapping begins with a refresher of what the Board of Supervisors is supposed to be accomplishing and therefore must begin with a refresher of California Law as partially set forth following:

GOVERNMENT CODE

65300. Each planning agency shall prepare and the legislative body of each county and city shall adopt a comprehensive, long-term general plan for the **physical development** of the county or city, and of any land outside its boundaries which in the planning agency's judgment bears relation to its planning. Chartered cities shall adopt general plans which contain the mandatory elements specified in Section 65302.

65300.7. The Legislature finds that the diversity of the state's communities and their residents requires planning agencies and legislative bodies to implement this article in ways that accommodate **local conditions and circumstances**, while meeting its minimum requirements.

My concern after reading the information presented in today's agenda item is that we are being asked to development a strategy for preservation, not a "plan for the physical development" as prescribed by State Law. While implementation of mitigation measures set forth in the General Plan EIR is required, it is to be done so in context of the whole of the "general plan for the **physical development**" and **not simply in an effort to rewrite the General Plan by adding a preservation element.**

What I believe is needed as far as mapping is what can be developed:

- 1.. without INRMP/OWMP mitigation;**
- 2.. with on site mitigation;**
- 3.. with offsite mitigation;**
- 4.. and what must be preserved to provide "important habitat" as set forth on page 2 of the Master Report dated 3-04-10 for item 21 BOS agenda 03-16-10 at page 204 and as stated therein at DEIR 5.12-45; "Important habitat: For the purpose of General Plan Policy 7.4.2.8, Important Habitat is defined as habitats that support important flora and fauna, including deer winter, summer and fawning ranges and migration routes; stream, river and lakeshore habitat; fish spawning areas; seeps springs and wetlands; oak woodlands; large expanses of native vegetation;**

and other unique plant, fish and wildlife habitats. Degree or extent of importance will vary depending on proximity of connectivity to other areas of same or similar habitat that support the same flora and fauna. Higher density of such habitats will have greater conservation value than those isolated from same or similar habitats.”

The species list at table 3 beginning on page 425 of this agenda is an all encompassing list that would be useful for the El Dorado County Zoo but IS NOT an INDICATOR SPECIES LIST which would help us determine which lands can be determined to have value as (overall) habitat.

From the contract adopted 12-15-09 Item 36 page 08-0832 16E-2 Subtask 1.c Develop List of Indicator Species

The Project Team will develop a recommended list of Indicator Species to be utilized in identification of potential core habitat areas, corridors and linkages. For each Indicator Species, the Team will identify habitat relationships and discuss relevant characteristics such as distribution, status, dispersal and home range requirements.

Indicator species can represent particular structural and functional values of habitat, they can be species of particular management or regulatory concern (e.g., endangered species), or they can exert substantial influence on an ecosystem (e.g., mule deer). SEA will describe a combination of indicator species suitable for analyzing habitat quality, extent of usable habitat, connectivity, and habitat conservation. Because there can be a reciprocal relationship between choosing indicator species and finding sufficient data to evaluate their distribution and status, SEA will develop both a list of “best indicator species” and a list of “available indicator species”.

This list seems to be a compilation of personal preferences but does not seem to be a scientific list that is needed to determine the “important habitat” mapping! I would appreciate knowing, in lay English, just what species we are suggesting, with identifying information, differentiation between sub-species, numbers in existence, numbers when considered threatened versus not threatened, and locations for such species other than El Dorado County.

How many acres in study area? Is it still the area westerly of the 4000 foot contour? On page 424, where are the 7,807 acres of lake vegetation? And how does the total area in the chart of 553,014 acres of habitat compare to the size of the study area?

In spite of these issues, I believe (from page 436), that after deducting the already voided or developed areas, table 6 is the starting place acreage to determine what habitat is desired to be saved or preserved; a menu from which to select. How do I differentiate between table 2 and table 6 on the mapping?