

ISAC Meeting – February 4, 2010
INRMP Significant Concepts and Definitions

Background – 2004 General Plan and EIR

During the 2004 General Plan adoption process El Dorado County evaluated four “equal-weight” alternatives, together with a number of other alternatives discussed at a more conceptual level. Each of these “equal-weight” alternatives identified below was accompanied by a complete draft General Plan document:

- The “No Project” Alternative (assumed that the 1996 General Plan remained in place, but implementation would be limited by the restrictions under the Writ)
- The “Environmentally Constrained” Alternative (EC)
- The “Roadway Constrained” Alternative
- The 1996 General Plan Alternative

The draft General Plan documents for each of the “equal-weight” alternatives contained a discussion of the planning framework, and a set of policies designed to implement the primary goals and objectives of the plan alternatives. Between the alternatives, there were many similarities, and some significant differences. For example, although some sections of the EC and RC alternatives were identical, the EC alternative included an Important Biological Corridor policy which was not included in any of the other plan documents.

The General Plan EIR analyzed potentially significant impacts to biological resources that would result from implementation of each “equal-weight” alternative and identified mitigation measures that could be incorporated to minimize the severity of the impacts. The mitigation measures included preparation and implementation of the Integrated Natural Resource Management Plan (“INRMP”) and the inclusion of the Important Biological Corridor overlay (“-IBC”) in each of the plan alternatives. Even after inclusion of these mitigation measures, the impacts to biological resources for all of the “equal-weight” alternatives remained significant and unavoidable.

Ultimately, the County chose the 1996 General Plan alternative as the base document, and made various modifications to the policies, text and mitigation measures. All other alternatives were rejected as infeasible.

The INRMP

General Plan Policy 7.4.2.8 provides for development and implementation of an Integrated Natural Resources Management Plan “that identifies important habitat in the County and establishes a program for effective habitat preservation and management”. Policy 7.4.2.8. A.

provides, as an initial step, that the County “inventory and map” the following five categories of “important habitats”:

1. Habitats that support special status species;
2. Aquatic environments including streams, rivers, and lakes;
3. Wetland and riparian habitat;
4. Important habitat for migratory deer herds; and
5. Large expanses of native vegetation.

The INRMP is to provide a Habitat Protection Strategy to “conserve and restore contiguous blocks of important habitat to offset the effects of increased habitat loss and fragmentation elsewhere in the county” and a Mitigation Assistance Program for projects that “are unable to avoid impacts on important habitats”. Habitat will be acquired from willing sellers, either by fee title or conservation easement, from a range of funding sources. Management and monitoring of acquired habitats will be defined in the INRMP. [Please see the policy for further information.]

Arguably, any “habitat” can be characterized as “important” at some level. The backyard oak tree may be important nesting habitat to a scrub jay, a drainage culvert pipe may provide shelter for a family of skunks and the ornamental landscaping or cultivated crops on a 20-acre parcel may appeal to a resident population of mule deer living in the vicinity. This is not the purpose of the INRMP. The INRMP is a landscape-level plan that should focus on habitats that are “important” at a regional or county-wide level, as a means to mitigate impacts arising from habitat loss and fragmentation that will occur as the General Plan is implemented.

Definitions of Important Terms

The County has awarded a contract to Sierra Ecosystems Associates, Inc. (“SEA”) for Phase 1 of the INRMP development process. One task included in that contract is to facilitate discussions concerning important terms, namely: “Important Habitat”, “Large Expanses” and “Native Vegetation”. Several alternative definitions have been presented by SEA to two advisory committees (PAWTAC and ISAC) for discussion. This paper responds to those definitions.

“Important Habitat”

General Plan Policy 7.4.2.8. A. identifies “important habitats” to be inventoried and mapped. These include habitats that support special status species, aquatic environments (streams, lakes, and rivers), wetland and riparian habitats, important habitat for migratory deer herds (winter, summer and fawning ranges, and migration routes), and “large expanses of native vegetation”. The first four of these categories seem to be generally self-explanatory, although it may be challenging to map all categories at a landscape-level. The last category, “large expanses of native vegetation” is addressed in the section that follows.

Materials provided by SEA suggest that a definition of “important habitat” might be found in the GP EIR (5.12-45). This citation misstates the source. The EIR is actually citing language found in the Roadway Constrained Alternative (April 2003, Page 259) and the Environmentally Constrained Alternative (April 2003, Page 261). Both of these alternatives were rejected by the County in favor of the adopted General Plan.

In addition, the RC/EC language conflicts with General Plan Policy 7.4.2.8. The RC/EC language includes “oak woodlands” in the definition, which could be construed to apply to an isolated area of oak woodlands as small as one-tenth of an acre. The language in General Plan Policy 7.4.2.8 also applies to oak woodlands, but only to the extent that oak woodlands comprise or are part of a “large expanse of native vegetation”. Other GP policies (canopy retention/replacement standards and heritage or landmark tree policies) provide additional protection for smaller areas of oak woodlands, including those that do not reach the level of a “large expanse of native vegetation”.

I suggest that we rely on the language of 7.4.2.8 to provide a working definition of “Important Habitat”. This definition will be refined as large expanses of native vegetation are identified, the inventory and mapping are updated, and the County evaluates which of these areas are important at a county-wide or regional level. Ultimately, at the end of the INRMP process, I would hope that we can define “Important Habitat” by reference to a map that depicts the type and location of the various categories.

“Large Expanses of Native Vegetation”

This is the last of five categories of “important habitat” to be inventoried and mapped under Policy 7.4.2.8. A. To develop a definition, it is helpful to recognize the reason the policy is included in the first place.

Once again, this part of the INRMP is included for the purpose of mitigating impacts resulting from by General Plan implementation, including loss and fragmentation of wildlife habitat. Several studies have addressed the issue of fragmentation of natural or native habitats. In an analysis of the effectiveness of policies contained in the 1996 El Dorado County General Plan (Saving and Greenwood, 1999), modeling predicted that, although only about 4% of the “wildland” oak woodlands in the county would be physically lost to development, some 40% of the remaining “wildlands” would be impacted by fragmentation and converted to what they called “marginal or urban woodlands”, either because of their “proximity to urban land uses or by isolation from larger patches of contiguous natural vegetation”. (GP EIR 5.12-39.)

To mitigate for this impact, Policy 7.4.2.8. provides for the County to develop and implement a habitat protection strategy, with the goal to “conserve and restore contiguous blocks of important habitat” (including large expanses of native vegetation) to “offset the effects of increased habitat loss and fragmentation elsewhere in the county”.

The definition of a “large expanse” should include the following concepts:

- Habitats meeting one of the other four criteria for “important habitats” are not included in this section. For example, habitat that supports special status species is not also required to comprise a “large expanse”.
- The “large expanse” should be of sufficient size and configuration to support the range of species (plant and wildlife) typically found within the habitat type or matrix of habitats.
- Both road density and parcel size are useful in identifying large expanses. It might be helpful to quantify the amount of undeveloped land or native vegetation based on the actual size of the expanses. (For example, X% of the land in the county is configured in expanses of more than 5,000 acres; Y% of land is configured in expanses of 3,000 to 4,999 acres; and Z% of land from 1,500 to 2,999 acres.)

I believe that “native vegetation” should be interpreted to refer to an area consisting predominately of plants that are naturally occurring or indigenous to an area, and not introduced by human activity. I would prefer to find a definition within the General Plan, and so suggest that the definition of “Natural Communities” might be modified as follows:

“Native Vegetation” A general term for an assemblage of naturally-occurring plants located in an area that is relatively undisturbed and unfragmented and that is self-perpetuating. “Native Vegetation” communities are generally comprised of a variety of plant species that have evolved together over time in a specific location or region as a result of complex interactions among climate, soils, hydrology, topography, fire, vegetation, wildlife, and humans. (Source: EDC General Plan, July 2004, Glossary, p 245)

As an alternative, I would support the definition from the Jepson Manual.

Annual Grasslands

Both PAWTAC and ISAC have discussed the merits of including annual grassland habitats in the definition of “native vegetation” and under the broader definition of “important habitat”. Much of the annual grassland in California has been overtaken during the past two centuries so that it now consists primarily of non-natives. Nevertheless, these annual grasslands do provide significant habitat value for a number of wildlife species, and contribute to overall wildlife diversity.

The Board of Supervisors has the discretion to expand the definitions to include non-native annual grasslands if they choose. There are policy implications that should be considered, including the effect on potential development, the impact on available sites for oak tree replacement/replanting mitigation and whether grazing activities would be impacted by this proposed change.