

INRMP – Initial Inventory Mapping – Subtask 1.b

Technical Issues Outline

June 19, 2010

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1. Habitats that support Special Status Species

Background:

The GP EIR included lists of “special status” plants and wildlife, as well as a list of criteria used to develop the lists. The criteria are:

- species listed or proposed for listing as Threatened or Endangered under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA);
- species considered as candidates for listing as Threatened or Endangered under ESA or CESA;
- wildlife species identified by California Department of Fish and Game (CDFG) as Species of Special Concern;
- wildlife species identified by U.S. Fish and Wildlife Service (USFWS) as Species of Concern;
- plants listed as Endangered or Rare under the California Native Plant Protection Act;
- animals fully protected in under the California Fish and Game Code;
- plants on California Native Plant Society (CNPS) List 1B (plants rare, threatened, or endangered in California and elsewhere) or List 2 (plants rare, threatened, or endangered in California but more common elsewhere).

The Special Status Species lists in the GP EIR included a number of species found only at higher elevations, and consequently above the 4,000’ elevation boundary of the INRMP study area. (Examples include Tahoe yellow cress, Mountain yellow-legged frog, Lahontan cutthroat trout and California wolverine.) Habitat for these higher-elevation species is outside the INRMP study area, and they are therefore appropriately excluded from the consultant’s report.

Issues:

- A. The map deviates from the GP EIR “Special Status Species” lists and criteria. Some “lower elevation” species expressly listed in the GP EIR are not covered by the map/report.
- B. The consultant has expanded the criteria to include two plants (Butte County fritillary and Bisbee Peak rush-rose) that are found on CNPS List 3.2. This list comprises “Plants about which more information is required.” *Inclusion in CNPS List 3.2 is not one of the criteria utilized in the GP EIR.*
- C. The consultant has further expanded the criteria to include wildlife on a “Special Animal” list maintained by CDFG. Examples include great egret, several invertebrates (snails, beetles, bees), none of which has any special legal status. Note that CDFG does not have authority under CESA to list “bugs”.

- D. The consultant has expanded the list to include four species (Hardhead minnow, American badger, Ring-tailed cat, and Vernal pool tadpole shrimp) which were not identified in the GP EIR, but which would meet the criteria because of their listing status. However, there are no documented occurrences for these species in the California Natural Diversity Database (CNDDDB) in El Dorado County. The consultant instead states these are “known by local biologists to occur...”. Species should only be added where based on documented evidence (i.e., CNDDDB).
- E. In some cases, the documentation of Special Status Species “occurrences” is non-specific or may be based on historic sightings described very generally in the literature. Most of these are depicted by large circles (often more than a mile in diameter) on the map. These large circles imply that large blocks of habitat may be found in a particular area when, in reality, they signify a lack of information. The BOS should consider eliminating these areas from the map altogether.
- F. The consultant has utilized a combination of soils data and vegetation types to map potential areas of rare plant habitat. While these areas may indicate “potential” rare plant habitat, they do not represent documented “occurrences”. This type of mapping might be better utilized to identify areas in which site-specific surveys should be performed to determine presence/absence of rare plants.
- G. The GP EIR identifies six “Sensitive Habitats”. Two are found at higher elevations and are outside the study area. Vernal pools and Valley oak woodland are mapped as part of this exhibit. The remaining two sensitive habitats, “Montane riparian” and “Valley-foothill riparian” are not mapped and should be included. In addition, the consultant has expanded the list of sensitive habitats to include three other habitat types: Central Valley Drainage Hardhead/Squawfish Stream, Central Valley Drainage Resident Rainbow Trout Stream, and Sacramento-San Joaquin Foothill/Valley Ephemeral Stream. All are documented as present within the INRMP study area.

2. Aquatic Environments

This map relies on the best available information. Note that the “line weight” or symbols are used to distinguish between perennial and intermittent streams, and should not be interpreted as representative of the size or width of the drainage.

3. Wetland and Riparian Habitat

Mapping of wetlands and riparian areas is difficult without site-specific surveys. The consultant has mapped “buffers” of 50’ on each side of intermittent drainages (100’ total), and 100’ on each side of perennial drainages (200’ total). These “buffers” were incorporated in the GP as an interim standard, until the zoning ordinance is updated. Adoption of these standards in the INRMP will bootstrap the interim standards into permanent policy.

4. Important Habitat for Migratory Deer Herds

Issues:

- A. Figure 4, Important Habitat for Migratory Deer Herds illustrates three types of habitat within the INRMP study area: Critical Winter Range, Winter Range and the westernmost limits of the Summer Range. The purpose of the INRMP is to identify and protect, where feasible, “critical fish and wildlife habitat, including deer winter, summer and fawning ranges” and

migration routes. As identified in the GP EIR maps, the only area that should be mapped as important habitat is “critical winter” range, not all of the winter range. The Composite INRMP Habitat Inventory Map seems to recognize this by including only the “critical winter range”. Figure 4 should be corrected to be consistent with the Composite map.

- B. Interesting to note that two distinct deer herds are delineated. The Pacific Herd on the north side of Highway 50 and the Grizzly Flat Herd on the south. Does this mean that even the migratory deer populations don’t migrate north/south across Highway 50?

5. Large Expanses of Native Vegetation

Issues:

- A. The consultant argues that this map depicts the “large expanses of native vegetation” in the County. We disagree. *This map is merely a computer-generated image of a set of criteria for parcel size, road density and current development status. Revising the criteria, or adding other parameters (such as GP land use designation) would produce a different result.*
- B. An administrative draft of the “Large Expanses” map was prepared (February 19, 2010) utilizing different criteria. That map, available at http://www.co.el-dorado.ca.us/Planning/ISACagendas/2010/20100401_C2_Disturbance_Gradient_Map.pdf depicts more disturbed area in the County, and therefore identifies less total land as “large expanses” than the version now presented to the BOS for adoption. This first map was “tweaked” to produce a result that labels more land area as “large expanses”.

It appears that a significant part of the change is in the elimination of gradation or nuance in the criteria. The first version used 10 classes of “development” based on existing parcel size; the current version uses existing parcel size but also designates land as either developed or undeveloped. (“Developed” land was defined to include developed and vacant commercial/industrial properties, and high intensity residential uses on parcels 2.5 acres and smaller. All other lands, including developed residential uses on lots over 2.5 acres are characterized as “relatively undeveloped” regardless of the intensity of the land use.)

Similarly, road intensity in the first version used 15 classifications to distinguish between higher volume, multi-lane highways at one end of the spectrum and narrow, paved or even unpaved roads on the other. The current version uses a single threshold (3 km/km²) to distinguish between developed and undeveloped land.

In short, the current version presented to the BOS produces a “coarser” result, even though it purports to use more information. By treating each criteria as “black or white”, “developed or undeveloped”, “above or below the road density threshold”, the most recent version lacks the refinement found in the Administrative Draft.

- C. This is not to suggest that the Administrative Draft should be adopted as submitted. The purpose of the INRMP is to mitigate impacts arising from development under the General Plan. The BOS should consider incorporating General Plan land use designation as part of the identification of “large expanses”. As with the Oak Woodland Management Plan, it would be appropriate to designate “large expanses” in areas not currently fragmented and not planned for future fragmentation.