

TO:

Board of Supervisors

FROM:

Fred Yeager

SUBJECT:

BWG Comments on the Draft Conservation Strategy Outline

DATE:

October 17, 2003

To facilitate public stakeholder representation in the Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP) planning process, an 11 member Biological Working Group (BWG) was formed in 2001. This group meets regularly to discuss HCP/NCCP progress. The BWG recently met in September and October to review, discuss, and comment on the Draft Conservation Strategy Outline (CSO). Four members of the group formally responded to the Draft CSO. These comments are attached for your review and consideration.

Dear County Staff:

Thank you for asking Wildlands, Inc. to comment on the Draft Conservation Strategy for the Placer County Natural Communities Conservation Plan/Habitat Conservation Plan. A tremendous amount of work has helped bring the County to this point of decision on the future of both development and conservation in the Western County. We endorse the goals and objectives of the Draft Conservation Strategy and recognize its potential benefits for both habitat/agricultural conservation and for orderly community growth.

The lands acquired and managed by our company provide the benefits of habitat and agricultural conservation, while addressing the mitigation needs of community development. We have acquired five properties, totaling over 2,300 acres of important native habitat and rangeland. Four of five of our properties are located west of Highway 65, the locale identified in the Draft Conservation Strategy as the primary Conservation Opportunity Area. Two of our important properties, the Orchard Creek Conservation Bank and the Aitken Ranch Preserve, are connected by virtue of the water that flows down Orchard Creek to Auburn Ravine, which runs through Aitken Ranch. The Orchard Creek Conservation Bank serves as an open space buffer between the cities of Roseville and Lincoln.

We have two observations at this juncture, discussed below. First, there is a risk that large changes in land use during the preparation of the Conservation Plan will preclude opportunities to adopt and implement a successful plan. There is no better time to follow the current General Plan than now, when critical, future forming decisions are being considered. Specifically, extension of major public facilities substantially into the Conservation Opportunity Area may confound implementation of a conservation plan by inducing urbanization, increasing land costs, reducing the viability of continued agricultural operations, and making the management of open space properties difficult and costly.

Our second comment is that we endorse the Draft Conservation Strategy's inclusion of mitigation and conservation banking as an implementation tool. We feel that this tool has several advantages, such as involving the landowner in conservation initiatives, providing incentives for excellence in conservation to the private sector, using supply and demand to help keep land costs in balance, and diversifying the approach to land acquisition and management, thus providing multiple paths to conservation success. California's 1996 Conservation Bank policy intended that conservation banks be used to help implement HCPs and NCCPs, and this has occurred successfully in San Diego's Multiple Species Conservation Plan, where the establishment of multiple conservation banks has helped protect key habitat areas, while keeping land acquisition cost increases in check.

Thank you for all of your work to guide growth and conservation in Placer County. We appreciate being part of the dialogue leading to a conservation plan.

From:

<ERPfromCA@aol.com> <LClark@placer.ca.gov>

To: Date:

10/14/03 12:21PM

Subject:

Comments on Draft Conservation Strategy

Loren,

Having read this through a couple times, I find it difficult to find areas for improvement. The plan looks excellent. It contains all the essential elements we have been discussing and is realistic in its assessment of the potential to meet the goals. Kudos to all involved. I only hope we have the opportunity to actually try to make this happen.

My only suggested changes are the ones I mentioned at the last BWG meeting regarding changes in the covered species list. Below in order of priority:

- 1. Add Loggerhead Shrike to the list. This species is a CA species of Special Concern and is in serious and widespread decline throughout its range (Robbins et al. 1986, Droege and Sauer 1990, Reuven 1996). West Placer has large numbers of wintering birds (41 found on 2002 Lincoln CBC--7th highest total of 117 CA count circles) and a fair population of breeding birds (pers. obs.).
- 2. Add Prairie Falcon to list (CA Species of Special Concern). We have relatively large numbers of Prairie Falcons wintering in West Placer (the 9 found on the Lincoln 2002 CBC put us among the top few circles in all of North America). It is a species that needs large expanses of open habitat and is particularly sensitive to even small degrees of urban encroachment (Berry et al. 1998).
- 3. Remove Yellow Warbler from the list. Any attempt to reintroduce breeding Yellow Warblers in West Placer is doomed without a rigorous (and completely infeasible) cowbird control program. While it may serve as a good proxy for high quality, broad riparian areas, I think we have enough other good proxies for that habitat to cover it. Having Yellow-billed Cuckoo on the list already sets a VERY high and relatively 'visionary' standard for quality and extent of riparian restoration.

Berry, M.E., Bock, C.E. and Haire, S.L. 1998. Abundance of Diurnal Raptors on Open Space Grasslands in an Urbanized Landscape, Condor 100:601-608

Droege, S. and Sauer, J.R. 1990. North American Breeding Bird Survey Annual Summary, 1989. US Fish & Wildlife Service Report 90:1-22.

Reuven, Y. 1996. Loggerhead Shrike (Lanius Iudovicianus) in Birds of North America, no. 231 (A. Poole and F. Gill, eds.) The Academy of Natural Sciences, Philadelphia, PA and the American Ornithologists' Union, Washington, DC.

Robbins, C.S., Bystrak, D. and Geissler, P.H. 1986. The Breeding Bird Survey: Its First 15 Years, 1965-1979, US Fish & Wildlife Service Resource Publ.

Comments to the Placer County Board of Supervisors

I hear that Placer County is the fastest growing county in the State. I hear students, friends, and citizens complain about the extent and rate of growth. I hear how "out of control" development is in Placer County. I hear, high tech companies, such as Hewlett-Packard and Oracle, are now moving employees away. And will this economic boom remain? The key point to ponder is this: is this the same attractive place to live as it was just 10 years ago? Is it responsible planning to envision even more massive development projects beyond Lincoln Hills, Twelve Bridges, Bickford Ranch and others... with such a low density mix and cumulative impacts already and a build-out scenario in such a short span of time?

Conservation and growth management are then interrelated... two sides of the same coin. That is, "growth management" cannot be left out of the decision-making process. And by conserving farmland and open space our leaders are providing equally pleasant places for people to live and work. Another way to put it, the quality of life is tied to open space, conservation of natural resources (such as oak woodlands, riparian corridors, etc.), agricultural lands, small-sized communities, clean air, reasonable levels of traffic, and places that are built slowly and with character.

Yet all of this is in serious jeopardy. Already development on the west slope have transformed the rural character of this area into high density suburbs, warehouses, a large casino, major traffic congestion and visual blight. Many resources, such as oak woodlands and vernal pools (for instance along Pleasant Grove Creek in Roseville) have been destroyed or need to be protected immediately. Flooding is a real issue as well, as too much of the landscape is being covered with impervious surfaces known to significantly degrade watersheds.

Given the current growth rates and impacts, to further extend this type of development without in-fill along major existing corridors (whether inside the County or outside of it), would be irresponsible planning. To create another corridor of growth along the proposed Placer Parkway would utterly accelerate growth onto the agricultural lands and pull development away from areas of in-fill. If built as proposed, permanent preservation of adjacent lands is critical. Current projects should not be accepted or moved along the environmental review process until a route is determined.

Much open land already exists between Baseline Road and I-80, the most logically area of growth, such as Placer Vineyards. McClellan AFB will ultimately open land resources in the future as well and cannot be ignored as development opportunities. In short, not one more project should be approved to the West of Roseville (Fiddyment Road) or north of Baseline Road without a long-term Habitat Conservation Plan (HCP) in place. Leap-frog development is unwarranted.

Looking outside of County boundaries, there are major cumulative impacts already on traffic congestion, loss of open space and habitat, air pollution, visual blight and a sense of place. Folsom, Eldorado Hills, Elk Grove, Natomas, to name a few, all have explosive growth rates comparable to Placer County. And all of this combined adds to major urban sprawl. As a comparison, Atlanta, Georgia was the size of Sacramento just 30 years ago. Today it has the worst urban sprawl in the country (700 sq. miles). Likewise, the Sacramento area has been accused of becoming another Los Angeles with all of it's concomitant social problems, and with the huge growth all around Sacramento, this pattern seems to be where we are heading.

Yet Placer County can provide some solace from this urban sprawl with wise planning today. Here are a summary of my recommendations to the Board:

- > any possible future university site or residential area, needs to be incorporated into the Placer Vineyards project or areas near SR65 or I-80. Smart growth realizes that land resources are a one-time resource and not to be squander. If a decision is made to convert ag. lands to urban zoning, it is irreversible, such as Bickford Ranch. I see no justification for this rezoning at this point.
- > The CSUS campus seems like a benefit the community and for development. It is located within close proximity to existing or future development. A CSUS campus will benefit the community and reduce commutes to the main CSUS campus along I-80.
- > No lands should be developed West of Fiddyment Road until a HCP is establish (as mentioned earlier). Consistent with the General Plan, "1.H.2 The County shall not encourage expansion of urban uses into designated agricultural areas." Leap-frog development would also provide justification to take more intervening ag. lands in the future. Additionally, to extend Roseville's current city boundary would be disproportionately large to other cities in the area.
- > A parkway connecting Hwy 193 near Lincoln to SR 99/70 along Nicolas Road and the new realignment of SR65 should be considered. When looking at the overall map, this would navigate traffic around the future congestion of Hwy 65, allowing traffic to flow from SR99 to Auburn. The current alignment runs directly over the rich bottomlands and oak woodland corridor of Pleasant Grove Creek, vital habitat for the HCP.
- > Attention should be focused on Placer Vineyards, a development plan comparable to creating an entire city by itself. Much effort and planning should be invested here first.
- > Remaining holding capacity of the area seems very reasonable already (over 400,000 people), especially when factoring in adjacent counties and land

development opportunities. To insist on adding more capacity is unnecessary and irresponsible.



MOTHER LODE CHAPTER

1414 K STREET, SUITE 500 SACRAMENTO, CA 95814 Tel. (916) 557-1100 x 108 Fax: (916) 557-9669 coordinator@sierraclub-sac.org www.motherlode.sierraclub.org

October 15, 2003

Loren Clark Placer County Planning Dept. 11414 B Avenue Auburn, CA 95603

Dear Loren,

Thank you for the opportunity to comment on the Draft Conservation Strategy Overview for the HCP/NCCP. Here are a few thoughts:

In A.4.Broad Conservation Goals, how does 1) "sustain all present natural communities in the Western Placer County landscape" relate to 12) "In order to meet conservation objectives... the Conservation Plan will need to show how Western Placer County will retain **substantially** all of the biological resource values that it has now." This worries me in that it implies that the Plan won't be able to fully meet its goal of sustaining the county's natural communities. It allows some wiggle room, a certain absence of a full commitment or confidence.

It is noted in A.7. and B. 9. the need for project mitigations to "keep pace with and precede development impacts." This is an important commitment. We've seen HCPs in which mitigation lands were to be acquired at a later date and mitigation funds were inadequate to purchase suitable land. Where impact fees are paid in lieu of land dedication or easement (A.16.c), will that fee be directed to pay for the appropriate mitigation prior to the granting of project permits? If the money is held in a fund, the amount may be inadequate by the time suitable mitigation is determined.

The description of the Development Opportunity Area (C.1.b.) does not seem consistent with oral presentations. I understand it is the area in each alternative where growth may occur depending on the land use decisions by the county and the cities. It is stated that it represents "[areas] where projected growth may be more reasonably accommodated and may be compatible with the Conservation Plan's goals and objectives..." I don't understand the use of the word "more." More than what? Is there another land use scenario on the table that is less reasonable? The language seems to imply that these growth areas are in locations that are compatible in some way with the conservation goals of the Plan. In fact, the alternatives show that as the Development Opportunity Areas increase the Conservation Opportunity Areas shrink. Thus, the Development Opportunity Areas would at best have a neutral effect on the Plan, but more likely their expansion would make the goals of the Plan more difficult to meet. Can this be spelled out?

COMMENTS IN ADDITION TO THOSE IN THE EARLIER EMAIL VERSION OF THIS LETTER:

A.3. Natural Communities:

It is true that by focusing on preserving habitat, distinct species that require that habitat will also be aided. However, this approach does not obviate the need for specific management for each individual species.

A.8.&15. Certainty & Implementation:

The Plan may not be comprehensive enough to be able to provide "one-stop shopping" for all permitting. Certain state and federal permits are not species-based (e.g. permits under the Clean Water Act). Also, "no-surprises" provisions do not apply to statutes other than ESA and CESA.

A.11a &b On-Site and Off-Site Mitigation:

While it is important to retain large contiguous habitat preserves, that strategy should not preclude acknowledging the need to protect habitat with unique features through on-site avoidance.

I would like incorporated in my comments those which follow.

From John Hopkins of Institute for Ecological Health:

The approach of considering conservation in the light of what was present 150 years ago is very good (an unusual) -should be commended and encouraged.

A.3. Classification of natural communities:

Why 10 acre cut off between small and large patch community? For riparian and some specialized plant associations this is reasonable, but for several of the natural communities 10 acres is far too small to consider a large patch.

The CWHR habitat classification system just uses a small number of plant communities. Fine for an area-wide land use cover map, but not for various specialized plant associations {for that should use system in A Manual of California Vegetation, by JO Sawyer and T Keeler-Wolf.) Jeff Finn assures me they will use the more intricate array of plant associations as well.

A.4.Broad Conservation Goals

Additional helpful broad goals: Conservation of landscape connectivity; conservation and restoration of ecosystem processes and functions.

Several references are made to the intention of maintaining essentially all of present biological value. This should be supported. Important that the draft plan provides very sound, fully documented, with scientific justification for this position.

A.7. Funding

Given the growth pressures in the area, it will be essential of obtain substantial additional funds and to get very significantly ahead of the development impacts (this can include loans to be repaid from mitigation fees). Reliance on a "pay as you go" system is unlikely to work.

P5 Item 11.a. As stated here, need to be very careful with use of on-site conservation. Plan require "minimum acceptable" criteria for conservation areas located in a matrix of future development - size, configuration, buffering etc of any on-site natural areas must be sufficient to ensure a very high likelihood of long-term persistence of viable populations of key species and to provide for ecological functions and processes. [Exception would be a small patch as the only way to conserve an extremely rare biological resource that must be conserved.]

<u>Item A.11.c.</u>

Mitigation for cumulative impacts is another excellent goal that will need strong documentation that this will be achieved.

Items A.16.a. and 16d

Land dedication and banking can lead to significant long-term problems. In particular, such areas (a) need to adhere to the Plan's in perpetuity monitoring and management requirements and (b) be fully available for the Plan's in- perpetuity adaptive management program.

Extent of development and conservation (p 9)

It is not clear if the development acreage includes rural (ranchette) development. It is necessary to think in terms of conservation not only for mitigation but also additional conservation to aid recovery. In the long run far more than 20,000 to 30,000 acres of conservation are needed, whatever the future development patterns are.

B.5. Preliminary analysis...

Alternative growth patterns are needed (not may be needed). It is clear that a switch to Smart Growth within a few years, with development focused on existing developed areas, is essential for Western Placer County. These alternative growth patterns will also provide for a very high quality of life for future generations, and move Placer away from community-degrading sprawl.

The "hard line" notion

This draft CSO is not a hard line approach. It is a fuzzy line approach. A hard line approach would draw the actual boundaries for the future preserves.

Conservation and Development Opportunity Maps

Alternatives 2, 3 and 4 need to clearly spell out the biological and human impacts of these varying degrees of development beyond current General Plan boundaries. It is not just a question of loss of habitats (as per the charts), but also loss of high quality habitat areas that should have little or no development and loss of connectivity.

Thanks again for the opportunity to comment.

Sincerely,

Terry Davis Conservation Coordinator Mother Lode Chapter Sierra Club