

## Addendum II: Costco oak tree removal

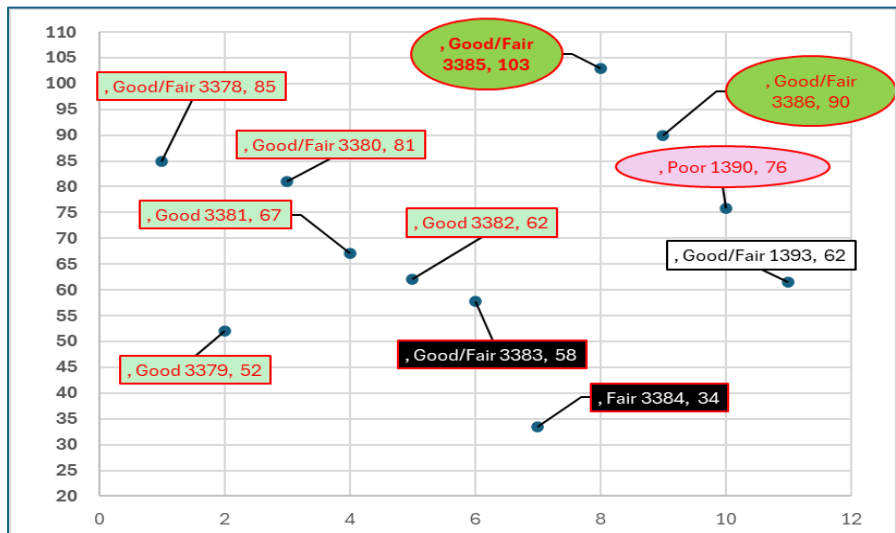
### 1. Helix Environmental data + ACD comments

Trre #	OAK SPP.	Helix 11/10/2020	Helix 5/3/2025	Size= DBH/DLR/Ht	Comment	ACD Observation
3378	valley	Good**	Good/Fair	40/35/40	Large Tree	These trees can easily be saved with a (+/- 10ft.) retaining wall in an area of about 14,600 sq. ft.
3379	valley	Good**	Good**	18/24/40		
3380	valley	Good**	Good/Fair	33/38/40	Large Tree	
3381	valley	Good**	Good	27/30/40		
3382	valley	Good**	Good	27/25/40		
3383	valley	Good/Fair	Good/Fair	26/23/40		Impact parking / no save Impact parking / no save
3384	valley	Fair	Fair	13.5/15/20		
3385	blue	Good/Fair	Good/Fair	48/40/60	Heritage	can be saved with judicious grading
3386	valley	Good/Fair	Good/Fair	42/38/60	Heritage	can be saved virtually out of parking area
1390	valley	Poor	Poor	49.3/20/35	Heritage	can easily be saved. See photo for health
1393	valley	Good/Fair	Good/Fair	26/23/40	Gas Stn site	Part of a very large cluster of oaks

\*Trees highlighted in yellow are to be "saved"

### 2. Weighted point Index

	Tree #	points
Good/Fair	3378	85
Good	3379	52
Good/Fair	3380	81
Good	3381	67
Good	3382	62
Good/Fair	3383	58
Fair	3384	34
Good/Fair	3385	103
Good/Fair	3386	90
Poor	1390	76
Good/Fair	1393	62



Weighted point index by American Forest Formula

Data by HELIX Environmental	Health	Tree #	DPH	DLR	Height	Area Sq.Ft.	Area Acres
Clump of trees on the western boundary by road to be saved by a common retainer wall	Good/Fair	3378	40	35	40	14,615	0.3355
	Good	3379	18	24	40		
	Good/Fair	3380	33	38	40		
	Good	3381	27	30	40		
	Good	3382	27	25	40		
Remove	Good/Fair	3383	26	23	35	1,213	0.0278
	Fair	3384	13.5	15	20	3,285	0.0754
Heritage	Good/Fair	3385	48	40	60	2,790	0.0640
Heritage	Good/Fair	3386	42	38	40	8,852	0.2032
Heritage	Poor	1390	47	20	35	1,834	0.0421
Gas Stn site	Good/Fair	1393	26	23	50	17,408	0.3996
Source: Letter of 5th March 2025 by Dena Elimelech	<b>TOTAL</b>		<b>347.5</b>	<b>311</b>	<b>440</b>	<b>49,997</b>	<b>1.1478</b>
	Individual		210.5	213.0	305.0	36,521	0.84
	Saved trees		282	225	295	28,091	0.6449
	%		81%	72%	67%	56%	56%
	Heritage		137.0	98.0	135.0	13,476	0.309

## OAK TREE MITIGATION COST CALCULATIONS

### 3. Table 3: mitigation fees by Helix, 5<sup>th</sup> March 2025

By HELIX Environmental	Number units	Sq.Ft.	Ratio	\$ / unit	TOTAL	Number of trees	\$/ Oak Tree
Oak woodland	0.35	15,246	1.00	\$ 8,285	\$ 2,900	12	\$ 242
Individual oak trees	108.6	Caliper inch	1.00	\$ 153	\$ 16,616	8	\$ 2,077
Heritage trees	134.7	Caliper inch	3.00	\$ 459	\$ 61,827	3	\$ 20,609
<b>TOTAL</b>					<b>\$ 81,343</b>	<b>12</b>	<b>\$ 6,779</b>

Oak woodland is greater than shown. Google Earth measures 1.1478 acres or 49,997 sq.ft for the area of tree cover.

### 4. Mitigation definition by EDCo Ordinance

“El Dorado County oak mitigation fees for removing native oaks are generally calculated at \$153 per inch of DBH (diameter at breast height) for standard trees and \$459 per inch for Heritage Trees (3:1 ratio)”.

### 5. A matter of interpretation?

- a. Oak area woodland: I dispute the area given in Table 3 (0.35 acres) given that I measured the canopy area of trees by Google Earth to be 1.15. Indeed, the clump of trees on Clarksville crossing is by itself 0.3355 acres. Therefore, the mitigation cost is \$9,509 and not \$2,900.
- b. I recognize that “interpretation” of the wording in red in #4 above to me is ambiguous. I interpret that the mitigation cost is literally “\$459 per inch” of heritage tree as shown below:

Heritage oaks mitigation	HELIX Environm.	A.C.Dunn
Number caliper inches	134.7	134.7
# Sq.Inches	404.1	404.1
Mitigation \$ / unit	\$ 459	\$ 459
Multiplication	X=134.7 x \$459	X= 404.1 x 459
<b>TOTAL</b>	<b>\$ 61,827</b>	<b>\$ 185,482</b>

- c. Mitigation value for heritage trees is therefore \$185,482 as shown below NOT 67% less as calculated by Helix, the question is what inches we are talking about, the ordinance is not clear not withstanding Helix’s statement that \$459 / inch “includes the 3:1 ratio”.

By ACDunn/ Google Earth	Number units	Sq.Ft.	Ratio	\$ / unit	TOTAL	Number of trees	\$/ Oak Tree
Oak woodland	1.15	49,997	1.00	\$ 8,285	\$ 9,509	12	\$ 792
Individual oak trees	213.00	Caliper inch	1.00	\$ 153.0	\$ 32,589	8	\$ 4,074
Heritage trees	134.70	Caliper inch	3.00	\$ 459.0	\$ 185,482	3	\$ 61,827
<b>TOTAL</b>					<b>\$ 227,580</b>	<b>12</b>	<b>\$ 18,965</b>

I rest my case in that the purpose of an EIR is to identify impacts and – by extension – impose a fee to encourage “avoidance”. I observe that according to Helix, a heritage oak’s mitigation value is \$20,609 per tree, a price that large nurseries in California offer for a 17 feet Valley Oak. While my mitigation value is \$61,827 which is truly the cost intent in saving / avoiding heritage oak trees. As it is, at the stated mitigation cost Costco is getting a very good deal to cut down heritage oak trees. To them, the statement of in-lieu mitigation (opportunity) cost of \$227,580 is akin to a 271% ROI (\*) over Helix’s value interpretation. Is that the objective of the County’s Oak Tree ordinance? I think not. (\*)(1-(227,580/61,827)=271%)

In short, the County needs to update their in-lieu fee to make people like Costco lose ten (10) parking spaces that I observe are impacted and pay only \$81,343.