

Alastair C. Dunn

16 March 2026

County of El Dorado Planning and Building Department – Planning Division,
Attention: Cameron Welch, 2850 Fairlane Court, Placerville, CA 95667.
EDHCostco@edcgov.us. Environmental Impact Report (EIR)

Re: Comment regarding oak tree removal & mitigation fees.

Dear Mr. Cameron Welch:

I note that the DEIR continues to state that the oak trees on the COSTCO warehouse site shall be mitigated by in-lieu fees. I also note that Helix’s letter of March 5t. 2025 makes specific reference to Oak Tree Preservation Recommendations and then dismisses the recommendation stating that “As previously discussed, mitigation may be implemented through payment of in-lieu fees ...” Fait-acompli! Bravo Costco!

Attached are two addenda with my comments – and opposition to – Costco paying the fee when an alternative mitigation is possible for most oak trees with some judicial grading and use of retaining walls. And I speak from professional experience during 45 years in land development.

In Addendum 1, I support my observations - indeed recommendations with series of photos and provided land plans on which I make specific illustrations. I shall not comment on these 15 pages since I believe your practiced eye will understand my points. Suffice is to say that carving out the identified oak tree areas – particularly the cluster on Clarksville Road - can be saved. Merely by inspection of the plans submitted I observe that about ten (10) parking spaces could be lost. Indeed, many trees appear to be outside the parking areas or within very steep grading areas ... that will probably require retention walls anyway.

My second Addendum is about in-lieu fee calculation. I interpret differently Helix Environmental’s calculations total mitigation cost of \$81,343 in their letter of March 5, 2025. By interpreting the ordinances definition differently, I calculate the mitigation in-lieu fee should be \$227,580.

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
TOTAL					\$ 227,580	12	\$ 18,965

In Addendum 2, I state my case in detail. To summarize my case, I believe it appropriate to restate here my concluding remarks:

“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-foot-tall Valley Oak. While my mitigation value is \$61,827 which is truly the cost / benefit ratio in saving / avoiding heritage oak trees. As it is, a total mitigation cost of \$61,827 Costco is getting a very good deal and encouraged to cut down heritage and other large oak trees.

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To Costco, in-lieu mitigation cost of \$ 61,827 is akin to a 271% ROI* when the real cost is \$227,580. Is that the objective of the County's Oak Tree ordinance? I think not.

* $1 - (227580 / 61827) = 271\%$

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 only pay only \$81,343".

I appreciate you - and the County's BOS - take my observations to heed and "save" the oak trees identified through some judicial grading and use of retention walls that I believe can be accomplished on this site.

Sincerely yours,

Alastair Dunn