

County of Placer

Board of Supervisors

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TO: BOARD OF SUPERVISORS

FROM: Supervisors Kirk Uhler and Robert M. Weygandt

SUBJECT: Update on the Placer County Conservation Plan (PCCP)

DATE: November 3, 2009

SUMMARY

Supervisors Uhler and Weygandt are providing the Board with a final update on the status of the PCCP Ad Hoc Committee deliberations. On January 23, 2007, the Board approved a map to initiate discussions with the Wildlife Agencies and asked Supervisors Weygandt and Uhler to meet with representatives of the City of Lincoln to discuss matters of joint interest regarding this map. After extensive meetings with representatives of the City of Lincoln and staff, Supervisors Uhler and Weygandt are now recommending that the Board authorize staff to submit the PCCP consistent with the principles and objectives outlined in the Conservation Strategy Report #2 (Exhibit A) and based upon the draft Reserve Map (Exhibit B).

BACKGROUND

Regulatory Coverage

The PCCP is intended to provide 50 years of compliance for the following state and federal regulations:

1. Incidental Take Permit - Federal Endangered Species Act – administered by: U.S. Fish and Wildlife Service (FWS) and National Marine Fisheries Service.
2. Natural Communities Conservation Plan - California Endangered Species Act and Natural Communities Conservation Act – administered by: California Department of Fish and Game
3. Section 404 and 401 of the Federal Clean Water Act related to wetlands and water quality – administered by: U.S. Army Corps of Engineers (COE) and the Regional Water Quality Control Board
4. Section 1600 Fish and Game Code - Master streambed alteration agreements – administered by: California Department of Fish and Game (DFG)

The regulatory coverage provided by these permits and agreements is intended to apply to public sector infrastructure and transportation projects and a wide range of private sector activities. In particular, the PCCP will provide regulatory coverage for the construction of

the Placer Parkway project and the indirect effects associated with the Sacramento River Diversion project sponsored by PCWA. A complete list of covered activities is listed in Exhibit A.

In June 2005, the California Department of Fish and Game, the U.S. Fish and Wildlife Service and NOAA Fisheries, submitted a co-signed letter to Placer County that provided a critique of a standards-based conservation strategy prepared by the County. One of the key issues raised was the need to identify the "location and specific acreage objectives of conservation lands." The preparation of a reserve map coupled with the development of acreage objectives for key resources has been the primary role of the Ad Hoc Committee since January 2007.

Updated Baseline Data

In addition to the updated growth projection that was completed last summer, County staff worked last winter/spring to update the landcover baseline data for the valley floor (i.e., areas below 200 feet in elevation). This is a key data set in that it identifies the numerous vegetation communities of western Placer County as well as the extent and location of developed lands. The conversion of this landscape over time results in the majority of the impacts that the PCCP seeks to address. The valley floor includes the greatest potential for urban/suburban growth that typically results in a wholesale displacement of functioning natural communities including habitat for state and federally-listed endangered species.

On the valley floor, the most critical land cover community is the vernal pool grasslands. Before final action by the Board, it was determined that a new and more accurate methodology was needed for identifying this important resource. The methodology was vetted through an academic peer review, an agency review, and through the consulting community. Staff also provided an opportunity for private landowners to provide their own information to insure that the County had accurate parcel-specific data for the re-mapping exercise (only one landowner on one parcel submitted this information). The new data has been subsequently used to determine the Draft Reserve Boundary that is presented to the Board in this report.

It is staff's belief that this updated information should be a suitable baseline for completion of the PCCP.

AD HOC COMMITTEE STATUS

On January 23, 2007, the Board of Supervisors acknowledged that two members of the Board of Supervisors (Uhler/Weygandt) and two Council Members of the City of Lincoln (Cosgrove/Santini and with Mayor Short replacing Councilmember Santini) would meet. These four elected officials formed what came to be known as the Ad Hoc Committee. The Board also directed staff to prepare a draft PCCP Reserve Map that combined two draft reserve map alternatives (Alternatives 4 and 14) as the starting point of discussions with the Resource Agencies. The January 23, 2007 Draft Reserve Map is attached as Exhibit C.

Since February 2007, the Ad Hoc Committee has been meeting with the City of Lincoln to discuss the PCCP. A significant amount of these deliberations have been devoted to the preparation of a Reserve Map. The Ad Hoc Committee has also met with staff and managers of the Wildlife Agencies to discuss Reserve Maps and the Ad Hoc Committee's approach to developing a conservation plan.

At this time, the Supervisors Uhler and Weygandt are prepared to present to the Board of Supervisors its final findings and recommendations. The Conservation Strategy Report #2 (Exhibit A) describes the key elements of a conservation strategy, including a reserve map, and the conservation standards and specific objectives that would serve as the foundation for a conservation plan. The Agency-Review Draft Conservation Plan is nearing completion. The completed document (13 Chapters and 13 Appendices) is expected to be completed before the end of the calendar year.

DISCUSSION

The Conservation Strategy Report #2 serves as an executive summary for the Conservation Plan to be prepared over the next two years. The Report describes some of the key elements that will be comprehensively addressed in the Conservation Plan. These elements include the following:

- Preparation of a reserve map that helps identify clear conservation goals and objectives
- Avoidance of a significant percentage of vernal pool complexes
- Watershed level connectivity in the Bear River and Coon Creek watersheds
- Incorporation of the draft County Aquatic Resources Permit (CARP) Buffer
- Incorporation of Low Impact Development Standards for water quality
- Consideration of 50 years of growth
- Coverage for Placer Parkway and PCWA Sacramento River Diversion
- Governance with the County and City of Lincoln

The following discussion outlines some of these key elements.

Draft Ad Hoc Reserve Map:

In September 2009, a draft Reserve Map was finalized (Exhibit B) which addresses the collective consensus of the four elected members of the Ad Hoc Committee. The map is intended to serve as the basis for the preparation of the Conservation Plan.

The Draft Ad Hoc Reserve Map consists of three basic elements: 1) The Reserve Area, 2) the County Aquatic Resources Permit Area (CARP), and 3) the Development Opportunity Area. A fourth area, depicted in gray, represents the boundaries of the non-participating Cities of Roseville, Rocklin, Auburn and the Town of Loomis. The County is proposing to provide regulatory coverage under the PCCP in the Spheres of Influence for Roseville for the Sunset Industrial Area and Auburn for the North Auburn/Bowman Area.

Reserve Area:

The "Reserve Area" (depicted as light and dark green) consists of two elements: 1) The Existing conserved area (green) which are lands already protected in perpetuity as a consequence of local, state, federal and private sector conservation activities. The existing reserves include lands acquired through the Placer Legacy program which are creditable to our anticipated PCCP obligations if they were not purchased with mitigation funds. 2) The Reserve Acquisition Area which includes lands that would be acquired during the term of the permit (50 years) for permanent conservation. The Reserve Area consists of approximately 73,165 acres. The entire Reserve Area would not be protected; only those lands necessary to meet the conservation objectives of the PCCP would be acquired (~50,000 acres). Some areas of the Reserve Area will have a higher priority for acquisition than other areas. Also, some areas will be restored to replace or improve lost functions.

This Draft Reserve Map also differs from earlier alternatives because of the updated vernal pool complex data that was completed this past Spring and Summer. Previous map alternatives were prepared, including alternatives supported by the Wildlife Agencies, on vernal pool data that was prepared in 2005 with a different mapping methodology

In summary, the Reserve area depicted on the recommended map was prepared after months of deliberation by the Ad Hoc Committee. The Committee reviewed analyses prepared by staff, comments from Wildlife Agencies, property owner input, input from stakeholder interests including the Biological Stakeholder Working Group, and non-participating Cities. The reserve area is a 74,000+ acre contiguous boundary of potential reserve lands that extend from the valley floor to the upper portions of numerous watersheds, including the transition from oak woodlands to a coniferous forest. At its narrowest it is one mile wide and at its widest it is approximately fourteen miles across. All major salmon and steelhead stream corridors are identified for habitat conservation, fish passage improvements, and restoration. Every major natural community has thousands of acres within which conservation and restoration can occur and with the guarantee of in perpetuity management and monitoring. Lastly, the reserve area accounts for the buildout of the County and City land use diagrams even though at the end of our permit term we expect to have 30% of our covered activity area undeveloped. Consequently, there will be a capacity for additional conservation, after 2060, for the remaining holding capacity.

For information regarding recent correspondence on the draft reserve map, that was reviewed by the Ad Hoc Committee, see Exhibit D.

CARP Area:

The County Aquatic Resource Permit (or CARP) area represents those areas along major stream corridors that would be protected from future incompatible development (depicted as purple along the stream corridors). The CARP area contains a number of key resources including streams, riparian habitat, endangered species habitat, floodplains and vernal pool grasslands. The CARP boundary is unique in that it is

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considered a viable habitat corridor that passes through areas where the landscape is dominated by urban, suburban and rural residential development. The key objective of the CARP boundary is to protect important stream corridors for their sensitive habitat, to conserve wetlands within those corridors to provide habitat for listed salmonids, maintain or improve water quality, provide connectivity between upper and lower watershed areas and to protect the integrity of the floodplains. The CARP represents approximately 34,058 acres in area and is the only area of the Reserve System that extends into the upper watershed areas of Dry Creek (i.e., the Loomis Basin) and Auburn Ravine.

Development Opportunity Area:

The Development Opportunity Area (depicted in cream) receives the majority of regulatory relief through the implementation of the PCCP. The Development Opportunity Area includes areas depicted for rural residential, suburban and urban development in the County and City of Lincoln General Plans. It also includes areas where growth may occur between now and the expiration of the permit term (2060). Infill development, ongoing rural residential development and new urban/suburban development is the dominant feature in the landscape. The Development Opportunity Area also includes the Placer Parkway Corridor. Alternative 5 has been selected by SPRTA as the preferred corridor for Placer Parkway and is only the route depicted on the PCCP mapping.

Non-Participating Cities

The non-participating cities are depicted in the map in two shades of gray, 1) dark gray for existing city limits and 2) light gray for sphere of influence areas not covered by the PCCP. In some instances a city's sphere of influence is proposed for coverage by the PCCP. This is particularly true in the Sunset Industrial Area where the City of Roseville has a sphere of influence and in the District 3 portion of the Auburn/Bowman area where the City of Auburn has a sphere of influence. PCCP coverage is proposed for these areas for a number of reasons: 1) they are located within the unincorporated area of Placer County, 2) the County has adopted policies which support land use planning and decision-making and 3) the County is providing substantial services to these areas and is planning new, additional or expanded services to accommodate growth.

The Reason Farms property, purchased by the City of Roseville for flood control and recreational purposes, is owned by Roseville but remains outside their sphere of influence. Upon its annexation and at the City's request, the PCCP would depict the property as non-participating city.

Sutter County:

The Draft Reserve Map depicts approximately 1,700 acres of the Coon Creek floodplain in Sutter County in the draft Reserve Boundary. Protection in this area is recommended to insure foothill-valley floor connectivity along Coon Creek watershed. This area has consistently been cited by the Wildlife Agencies as an important corridor for protection. An initial contact has been made with Sutter County regarding the Ad Hoc recommendation and additional discussions will be necessary. At this time, Sutter

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County has confirmed that conservation in this area does not conflict with their General Plan. The goal of the PCCP should be to insure that the joint conservation objectives of both Sutter County and Placer County can be met in this area (Sutter County is also preparing a NCCP in a joint venture with Yuba County).

Summary

The following table provides a side-by-side comparison between the 3 maps the Board has considered: 1) January 2007, 2) September 2008, and 3) November 2009.

Reserve Map	Reserve Area Acreage	Development Opportunity Area Acreage	CARP Area Present	Existing Reserve Acreage	Development Transition Area Acreage	Vernal Pool Preservation Ratio
Jan. 2007	70928	141907	No	8782	0	0.5:1
Sept. 2008	68080	93539	Yes	13803	21622	With DTA: 1:1
Nov. 2009	74413	109846	Yes	12407	0	1:1.02

Development Transition Area:

The draft Reserve Map presented to the Board for their consideration eliminates the "Development Transition Area" or DTA (formerly depicted in blue). The DTA was a 21,862-acre area that included the City of Lincoln's General Plan update growth areas and unincorporated areas of the County that could urbanize (e.g., the Curry Creek Community Plan area). Because the DTA contained a large amount of vernal pool grasslands and was adjacent to the Reserve Area, it was intended to serve as a transition between future urban development and the permanent conservation areas to the west and north.

Because the DTA did not provide a clear distinction between conservation areas and potential development areas, it was unclear to the Wildlife Agencies where conservation was anticipated. Even though conservation, management and acquisition standards were prepared, the actual location of lands to be protected would not be identified until individual projects came forward at some future date. The Ad Hoc Committee was concerned that this lack of specificity would result in less regulatory coverage for the DTA. Because the DTA area includes a significant percentage of high quality vernal pool grasslands (e.g., high density and low disturbance) and because it was located in areas where significant urban/suburban development was anticipated (e.g., the Sunset Industrial Area and the City of Lincoln's General Plan boundary) it was determined that a specific Reserve Boundary would best serve the interests of the County and City of Lincoln.

Urban Interface

One of the key issues of the PCCP Conservation Strategy will be to minimize the effect of urban edges adjacent to the PCCP Reserve Boundary. As you increase the urban interface, you increase the potential for conflicts with habitat lands that provide cover, breeding and foraging for covered species. You also increase the potential for invasive species, changes in hydrology, incompatible land use activities (e.g., the generation of noise, light, glare, odors, etc.). In order to address this issue, it is necessary to reduce

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the edge wherever possible and when its not possible to provide appropriate buffers especially along those habitat edges where species are sensitive to the impacts of urban land uses.

On first appearances, the PCCP Reserve Map appears to have a significant amount of edge effect (the interface between green and cream). However, much of this interface is along the CARP or stream buffers. In many cases these stream areas are within urban areas today and the PCCP only seeks to make those landscapes function better by protecting the floodplain, by improving water quality and through habitat restoration. The stream edge issues are not exacerbated by the PCCP but arguably can be made better than status quo. In other areas, the recommended conservation areas are in areas that have been designated for urban development since the 1960s (e.g., Orchard Creek and the Sunset Industrial Area). In these areas the urban edge is prevalent and needs to be addressed through appropriate buffering. Because the PCCP seeks to implement the adopted General Plans of the County and City of Lincoln, the Ad Hoc Committee has not recommended that large tracts of land designated for urban land uses be converted to potential reserves.

Vernal Pool Restoration and Recovery

One of the key elements of the conservation strategy is the protection of vernal pool resources. The majority of the deliberations of the Ad Hoc Committee have focused on providing a minimum 1:1 preservation ratio to mitigate for vernal pool grasslands impacted between now and 2060. The PCCP will also replace lost vernal pool wetlands through a compensatory replacement requirement (re-creating vernal pool wetlands or possibly other wetland habitats for every acre impacted). This compensatory requirement is necessary to meet the Clean Water Act standard of "no net loss". This approach is similar to regulatory procedures today where a landowner/developer typically needs to: 1) preserve intact habitats (~2:1) and 2) replace those that are impacted by a project such that there is no net loss of wetland habitat (~1:1).

In addition to the PCCP proposal to preserve (~1:1) and compensate for vernal pool habitat losses (~1:1), the PCCP is proposing to restore vernal pool grasslands. These restorable properties have the potential to contribute to the total acres that we need to protect to meet our preservation requirement. This is important because of the relative scarcity of the vernal pool landscape in Placer County and the need to identify a reserve acquisition area that insures connectivity, minimizes urban edge effects and contributes to species recovery. Restorable properties provide an opportunity to improve the qualities of a grassland such that it restores diminished habitat values without a wholesale re-creation of vernal pool habitat.

In order to identify restorable vernal pool grasslands, staff has used a number of criteria: 1) The property is not in laser-leveled rice production today. Laser leveled rice lands have had all of their natural hydrology removed and significant recontouring of the landscape would be required to bring back the historical hydrology. Within the regulatory and environmental community, there is also some controversy around using rice lands for re-establishing vernal pool habitat. 2) The site has the correct vernal pool soils. 3) The site is located outside of the 100-year floodplain. 4) Hydrologic conditions

can be enhanced or replaced to match those typically present on a natural vernal pool landscape. 5) There is evidence on 1937 aerial photography or other sources that the site was a vernal pool grassland in the past.

In terms of species recovery, it is necessary for the PCCP to demonstrate how it can contribute to the recovery for all listed species covered by the plan. For the vernal pool invertebrates covered by the PCCP, the U.S. Fish and Wildlife Service (FWS) has prepared a species recovery plan which includes lands in Placer County. The objectives of the recovery plan relative to Placer County include:

- Ameliorate or eliminate the threats that caused the species to be listed as federally endangered or threatened, and ameliorate any newly identified threats, in order to be able to delist or downlist these species
- Ameliorate or eliminate the threats that affect the species of concern and ameliorate any newly identified threats in order to conserve these species
- Promote natural ecosystem processes and functions by protecting and conserving intact vernal pools and vernal pool complexes.

The recovery plan includes a core recovery area that was based upon a different and older data set than the mapping prepared for the PCCP (Exhibit F depicts the County's vernal pool habitat mapping depicted in green and the core recovery area in yellow). As a guideline, the recovery area recommendations for Placer County include 85 percent of vernal pool habitat within the core recovery area. The PCCP reserve mapping protects approximately 46 percent of this area. However, it needs to be noted the PCCP also protects a significant amount of vernal pool habitat that was not originally mapped by the FWS when they prepared the recovery plan. When other habitat is accounted for, the PCCP reserve map protects 50 percent of the mapped vernal pool habitat in western Placer County which includes 46 percent of the core recovery area. In addition to the preservation standard of 1:1 or 50 percent, the PCCP also recommends the restoration of vernal pool habitat as discussed above. Restoration is recommended as one of the conservation actions in the FWS recovery plan, which states, "restore habitat where needed and adaptively manage vernal pool conservation areas".

Conservation Standards, Performance Criteria & Biological Goals and Objectives

Comprehensive performance criteria and conservation standards will need to be developed as a part of the PCCP Conservation Plan. These standards would apply to acquisition and restoration activities throughout the entire PCCP boundary, and not just to the Reserve Area. It will be the obligation of the participating agencies and the PCCP management entity to insure that these standards are met over time through the monitoring of permitting actions, monitoring of habitat land acquired, monitoring of restoration activities, and adaptive management activities.

Governance

PCCP implementation requires the interaction of the Board of Supervisors, the City of Lincoln, a management entity, the Wildlife Agencies, coordinating with partner agencies (PCWA and SPRTA), the regulated public, and the public at large. There is also the

need to insure that there is scientific input from the academic community to address issues as they arise over time.

The Ad Hoc Committee, with the City of Lincoln's concurrence, suggests that a joint powers authority comprised of two elected officials from the Board of Supervisors and a City Councilmember from the City of Lincoln would serve as the management entity. This JPA, known as the Placer Conservation Authority, would have the following duties:

- Negotiate land acquisitions
- Collect and manage PCCP mitigation funds
- Coordinate with Wildlife Agencies
- Coordinate with the Permittees
- Conduct public meetings
- Manage PCA Staff
- Apply for and manage grants
- Implement all conservation actions of the PCCP
- Monitor and report
- Develop and implement reserve management plans
- Develop and implement restoration plans
- Maintaining GIS data
- Insure public involvement

The City and County would still retain significant responsibilities; mostly in the form of permit processing for individual applications. The City and County responsibilities include:

- Receive, review and process applications which will request take
- Receive take authorization from FWS, NOAA and DFG
- Receive, review and process land development applications and other covered activities which will request take
- Insure that take avoidance, minimization, and mitigation occur consistent with the PCCP.
- Collect PCCP mitigation funds from applicants
- Coordinate with the PCA
- For Placer County – Provide PCA Staffing
- Apply for and assist the PCA with obtaining grants
- Track all land development applications processed pursuant to the PCCP
- Monitor and report development activities to the PCA
- Monitoring the implementation of mitigation measures and reporting to the PCA
- Adopt local ordinances to implement the PCCP

In essence the management structure has two functions: 1) **Placer Conservation Authority:** Manage mitigation funds, implement the conservation strategy and manage the reserve area in perpetuity, and 2) **City and County:** Insure that the PCCP mitigation and conservation requirements (including land dedications and fee requirements) are met on individual projects through their environmental review procedures and permitting

actions. The proposed governance structure is to be presented in the Agency-Review Draft Conservation Plan.

District 5 Boundary

On September 23, 2008 the Board directed staff to remove District 5 from the PCCP coverage area and potential Reserve Map boundary. This request was made at the request of former Supervisor Kranz. The consequence of this decision is that the District 5 area does not receive regulatory coverage at this time and no conservation activities are expected to occur within the boundaries of the District.

The District 5 area was initially included because it contains the upper portion of the Coon Creek watershed, and a portion of the Bear River as well as large blocks of unfragmented oak woodlands. No endangered species are known within this area although some habitat exists which could result in their presence. Salmon and steelhead spawn west of this boundary and cannot reach further into this portion of the watershed because of waterfalls, water diversion structures and Camp Far West Reservoir Dam.

The other reason for its inclusion was to provide regulatory coverage which includes portions of North Auburn area and all of the Bowman area. The removal of the District 5 area removes all PCCP regulatory coverage for this area. Projects will need to comply with state and federal laws consistent with status quo procedures at the time an application is filed. For example, projects in the Bowman area will need to comply with state/federal regulations and coordinate with those agencies directly. Projects on the Highway 49 corridor south of Bell Road will obtain all of their permits from Placer County.

NEXT STEPS

The Ad Hoc Committee has been meeting since February 2007. Prior to these meetings, staff had completed a number of tasks including: preparation of the baseline data, execution of the NCCP Planning Agreement, preparation of the draft County Aquatic Resources Plan and ordinance. Additionally, a Notice of Preparation of Notice of Intent had been previously posted to initiate the preparation of an EIR/EIS.

To complete the Conservation Plan, the following work program tasks will be completed:

- Revise and update the June 2005 Agency-Review Draft Conservation Plan consistent with the Ad Hoc Committee recommendations
- Prepare the Draft and Final EIR/EIS utilizing the Conservation Plan as the project description
- Prepare a Public Review Draft and Final Finance Plan
- Prepare the public review draft County Aquatic Resource Program and implementing ordinance

Completion of the PCCP will largely be contingent upon the responses received back from the Wildlife Agencies. At this time we do not know how long the agencies will take

to review the draft document. If past trends in other jurisdictions are an indication of what to expect, substantive comments will need to be addressed before a public review draft can be prepared. Sufficient revenues are available in the Planning Department's budget to continue to work on the PCCP throughout this fiscal year. General Fund support in subsequent fiscal years will be required to complete the plan.

SUMMARY

The Ad Hoc Committee is of the opinion that the essential elements of a conservation plan have been identified and that a Reserve Map has been prepared that meets local needs, provides greater certainty than previous Reserve Map alternatives and responds to the issues raised by the State and Federal Wildlife Agencies in their correspondence of June 2005 (i.e., the comment letter on the 2005 Agency-Review Draft Conservation Plan). The final document is nearing completion and is expected to be submitted to the Wildlife Agencies before the end of the calendar year.

RECOMMENDATIONS

Supervisors Uhler and Weygandt recommend that the Board of Supervisors take the following actions:

1. Direct County staff to continue to coordinate with the participating entities including the City of Lincoln, the Placer County Water Agency, and the South Placer Regional Transportation Authority on the final preparation of the Agency-Review Draft PCCP.
2. Request staff work with the Ad Hoc Committee for general direction and guidance on the preparation of the Agency-Review Draft Conservation Plan.
3. Request the Ad Hoc Committee review the Agency-Review Draft Conservation Plan and give input to staff prior to the submittal of the draft document for review by the Wildlife Agencies.
4. Provide direction to staff with regard to the designation of lands in District 5 in the PCCP.
5. Direct staff to initiate the preparation of the draft Finance Plan during the review of the Agency-Review Draft Conservation Plan by the Wildlife Agencies.
6. Request Supervisors Weygandt and Uhler continue their service with the City of Lincoln in order to respond to issues raised by the Wildlife Agencies and to review the Draft Finance Plan.

The following exhibits are provided for the Board's consideration:

- Exhibit A: Ad Hoc Committee Conservation Strategy Report November 2009
- Exhibit B: October 20, 2009 Ad Hoc Committee Recommended Reserve Map
- Exhibit C: January 2007 Board of Supervisors Reserve Map
- Exhibit D: Correspondence received by the Ad Hoc Committee
- Exhibit E: Placer County Vernal pool habitat mapping as an overlay on the USFWS vernal pool critical habitat and core recovery area for vernal pools.

cc: Jim Estep, City of Lincoln
Einar Maisch, PCWA
Stan Tidman, PCTPA/SPRTA
Wildlife Agencies
Biological Stakeholder Working Group
Conservation Strategy Group
Resources Law Group