COUNTY OF PLACER
Community Development/Resource Agency

Michael J. Johnson, AICP
Agency Director

PLANNING SERVICES DIVISION

Paul Thompson, Deputy Director

MEMORANDUM

TO: Honorable Board of Supervisors

FROM: Michael J. Johnson, AICP
Agency Director

DATE: June 4, 2013

SUBJECT: **PLACER COUNTY CONSERVATION PLAN**

ACTION REQUESTED

1. Receive a status report on the preparation of the Placer County Conservation Plan (PCCP) with a particular emphasis on the costs associated with the implementation of the program.

2. Approve an adjustment to the eastern boundary of the PCCP regulatory coverage area in order to incorporate the current and anticipated future boundary of Sewer Maintenance Boundary No. 1.

There is no net County cost associated with these actions.

BACKGROUND

In this report staff will present a number of items related to the work program including the following topics:

1. Background/Work program update
2. Overview of funding plan work program
3. Disclosure of preliminary costs and cost assumptions overview
4. Boundary shift for the PCCP coverage area to account for the current and future Sewer Maintenance District No. 1 (SMD-1) boundary
5. Status of the work program to develop a programmatic process for Federal Clean Water Act Section 404

Topic No. 1 – Background/Work Program Update

In 1994, the Placer County General Plan was updated. This update included the adoption of numerous policies and programs related to natural resource conservation. One of these programs called for the preparation of a conservation plan to address impacts on sensitive species. In 1998, the staff initiated the development of what became the Placer Legacy program. Placer Legacy included, as one its key elements, the preparation of a natural communities conservation plan and habitat conservation plan to address the impacts of growth on endangered species.

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

- Incidental Take Permit - Federal Endangered Species Act

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- Natural Communities Conservation Plan - California Endangered Species Act and Natural Communities Conservation Act
- Sections 404 and 401 of the Federal Clean Water Act related to wetlands and water quality
- Section 1600 Fish and Game Code - Streambed Alteration Agreements

These regulations are in place today and are part of the current land development review process. These regulations are administered outside of the local land development review process through as many as 4-5 different state/federal agencies. The PCCP will shift the responsibility from state and federal agencies to Placer County, City of Lincoln and PCWA so that compliance with these state and federal laws is addressed locally. The South Placer Regional Transportation Authority or SPRTA is also seeking coverage for the Placer Parkway project. The boundary of the current PCCP regulatory coverage area is depicted in Attachment A. The 31 species that would have regulatory coverage under the PCCP are listed in Attachment B.

Value of the PCCP

The primary value for the public's investment in this work program is the ability of the PCCP to replace the current, highly fragmented, time consuming, and expensive project-by-project approach to mitigation and regulatory compliance with a more efficient, comprehensive, long-term plan that is developed with state/federal agency concurrence and stakeholder input and is integrated into the local project review process.

The approach reflected in the PCCP is increasingly seen as a solution to problems associated with project-by-project review of land development projects and the timely delivery of public infrastructure. In Northern California there are 7 similar efforts underway including efforts in the counties of Yuba/Sutter, Butte, South Sacramento, Solano, East Contra Costa, Yolo, and Santa Clara. The interest on each jurisdiction's part is to solve the numerous and complicated problems associated with balancing growth in the region with the mandate of the state and federal agencies to protect sensitive species and their habitats. Southern California approached programmatic solutions only after the project-by-project process became so untenable that a programmatic solution was the only viable alternative left. It has always been Placer County's objective to avoid crisis management as the reason to consider a regional approach to resource conservation. With the likelihood of development activity increasing over the next couple of years, completion of the PCCP will be essential to avoiding future conflicts and delays that result from the status quo, in which environmental review and permitting is carried out in separate processes by local, state and federal agencies.

PCCP Benefits

The specific benefits of the PCCP include the following:

- Improved governmental efficiency and elimination of redundant review procedures
- Intergovernmental coordination to resolve regional problems
- Local regulatory control, with state and federal agencies in an oversight role

- 50-years of permit coverage for endangered species impacts
    - Coverage for major land development projects, i.e., Regional University and the Placer Vineyards Specific Plans and the City of Lincoln's General Plan
    - Coverage for the countless smaller land development projects
    - Coverage for routine maintenance activities by participating agencies.
    - Coverage for major infrastructure projects (e.g., Placer Parkway)
- Integration of species and wetland permitting into the County's CEQA review procedures and timeline
- Creation of comprehensive mitigation fee for compliance with local, state and federal laws

- Improved habitat conservation
- Improved biological monitoring and coordination of mitigation efforts
- Stabilization and recovery of sensitive local species
- Potential removal of local species from lists of endangered and threatened species
- A program for long-term stewardship and management of the natural landscape
- 5-years of programmatic permitting for wetland impacts with a rollover provision for additional years of coverage.

Summary of PCCP Mitigation Measures/Best Management Practices (BMP)
One of the primary purposes of the PCCP is to mitigate impacts on endangered species and the sensitive habitats associated with those species as a result of land development and the provision of infrastructure to support land development. This is accomplished by complying with a number of state and federal laws related to endangered species and wetlands via the implementation of a comprehensive plan for a large geographic region. The PCCP's conservation strategy has been developed using many of the same considerations that are already applied on a project-by-project basis by Placer County and the resource agencies but within the context of landscape scale plan that balances conservation with economic development activities. While the ultimate application will be on a project-by-project basis as the County and City reviews discretionary entitlements over the next 50-years, the requirements for mitigation will be based upon a single comprehensive plan and the requirements will be predetermined and approved in advance by state and federal regulatory agencies. Under the PCCP, mitigation requirements will be stable and predictable. There will be no need to renegotiate mitigation requirements each time a project comes forward. For some applicants the mitigation responsibility may be as simple as the payment of a fee, thus avoiding significant delays. Other applicants may be able to avoid impacts through the use of BMPs. Yet again, other applicants may have a combination of BMP measures and mitigation fees to achieve compliance. Chapter 6 of the PCCP will provide the framework for mitigation and BMP measures. Attachment C is a summary of the draft BMPs found in Chapter 6.

Covered Activities
In order to achieve its objectives the PCCP must mitigate the anticipated impacts resulting from all covered activities that are requested by the participating agencies. The covered activities are those activities spelled out by the participating agencies and must be specifically addressed by the PCCP. A covered activity could be a single one-time action (e.g., construction of a sewer pump station) or could be activities that are routine maintenance actions of local government (e.g., clearing of flood control channels). The following is a summary of the types of activities that are proposed to be covered by this plan.

- Placer Parkway
- Cumulative and indirect effects of providing Sacramento River water to west Placer.
- Land development activities between now and 2050 for unincorporated Placer County, west of Auburn, and for the City of Lincoln
- County infrastructure and roadway projects – new construction
- County maintenance activities (flood control, roads, drainage facilities, etc.)
- Restoration activities related to PCCP implementation and Placer Legacy.

Decision-making and Timeline
There are policy decisions that must be made by the Board of Supervisors and City Council of Lincoln in order for the program to proceed towards implementation. There will also be opportunities for stakeholders and the public to review the program and provide comment. Table 1 is a summary of the major tasks and an approximate timeline to complete them.

Table 1
PCCP Completion Schedule

Tentative Timeline[1]	BOS Action Needed	Task
Feb. 2011		First Agency review of Admin Draft PCCP
May 2011		Comments on 1st Admin Draft PCCP back from Agencies
June 2011-present		Staff, Ad Hoc, and BWG review of agency comments
Jan-Sept 2013		Preparation of 2nd Admin Draft PCCP
May-Nov 2013		Agency review of 2nd Admin Draft PCCP
Oct 2013		Initiate preparation of ADEIR/EIS
Dec 2013-Jan 2014		Ad Hoc and BWG review of Agency Comments on 2nd Admin Draft PCCP
Feb-April 2014		Preparation of Public Review Draft PCCP
Feb-April 2014		Initiate Preparation of the Admin Draft Implementing Agreement
Feb 2014		Complete preparation of the 2nd ADEIR/EIS
Feb-March 2014		Agency review of the 2nd ADEIR/EIS
Feb. 2014	X	BOS review of conservation strategy and funding plan with decision on funding plan and release of the public review documents
March-April 2014		Preparation of the Draft EIR/EIS and Federal Notice
April 2014		Final Agency review of Public Review Draft PCCP and ADEIR/EIS
May 2013-May 2014		Finance Committee review of funding plan
May-July 2014		Public circulation of the Draft EIR/EIS
May-July 2014		Public circulation of the PCCP and funding plan.
July-Aug 2014		Initiate preparation of the AFEIR/EIS
June 2014		BWG review of Draft Implementing Agreement
July 2014	X	BOS Review of governance alternatives for PCCP management/implementation and review of Draft Implementing Agreement and provide direction to proceed
Sept-Oct.2014		Agency review of response to comments and ADFEIR/EIS
Nov-Dec. 2014		Final Agency review of final PCCP and FEIR/EIS
Dec 2014	X	BOS approval of the PCCP Conservation Strategy and Funding Plan
Dec 2014	X	BOS Certification of the Final EIR/EIS
		Agency approval of FEIS
	X	BOS approval of final Implementing Agreement
	X	BOS Certification of the Final EIR/EIS
		Agency approval of FEIS
		Incidental take authorization granted

[1] Many factors can affect the outcome of the schedule. This table reflects a possible outcome if there are no delays in the work program. Key issues include: 1) the availability of state and federal staff persons to review draft documents, 2) the FWS is the federal lead on the EIS and their decision-making is independent of the County as the CEQA lead agency, 3) BWG, Finance Committee and Ad Hoc Committee deliberations

Topic No. 2 - PCCP Funding Plan

The PCCP consists of a number of documents including: 1) Conservation Plan, including the PCCP funding plan, 2) County Aquatic Resources Program (CARP), 3) EIR/EIS, and 4) Implementing Agreement, 5) and implementing ordinances. One of the members of the County's consultant team,

4C

Urban Economics, will be preparing the draft PCCP funding plan for the Board's consideration once the conservation strategy has been developed and we have concurrence from the wildlife agencies on the strategy. The PCCP funding plan will address four elements of implementation funding:

- Conservation funding – these are state and federal funds that help the PCCP achieve the conservation objectives of the plan above and beyond the need to mitigate impacts.
- Direct mitigation funding – the mitigation funding that will be associated with the project-specific impacts associated with a range of covered activities that are authorized during the permit term.
- Area wide mitigation funding – the mitigation funding that will be associated with landscape-scale cumulative impacts that are shared equally for all projects processed during the permit term.
- Ongoing costs after the permit term concludes

The funding plan will also provide the necessary nexus evaluation for the various fee components of the plan.

It is anticipated that most of the local mitigation costs of the PCCP will be borne by the new development receiving incidental take coverage for impacts to species and habitat under the PCCP permit. These costs will be distributed over the new development in the Valley and Foothill/I-80 Plan Areas. PCWA will also contribute mitigation funding commensurate with the level of impact of their covered activities which are small in comparison to the mitigation required to accommodate the growth on the valley floor and the foothill region. Lastly, major new infrastructure projects, such as the Placer Parkway highway facility, will need to mitigate impacts as well.

Cost Assumptions Methodology

The development of the costs and funding alternatives is the result of a long series of related work program tasks that had to be finished before estimates and funding alternatives could be developed. Changes to any of the myriad of assumptions and variables can have a very real effect on the costs associated with the program. In summary the work program tasks included the following:

1. Determine the scope of the overall effort, i.e., what areas of the County are to be covered by the PCCP.
2. Determine the length of time for which development impacts are to be covered (The PCCP is assuming approximately 50 years)
3. Determine the amount of growth to be covered over the term of the permit
4. Predict the amount of land required to accommodate the growth
5. Determine which species are to be covered and how projected changes to the western Placer County landscape will affect those species today and over time
6. Determine which covered activities are to be mitigated
7. Develop a conservation strategy to address the predicted impacts and to provide for the conservation of the species and their habitat
8. Identify measureable biological goals and objectives that can be analyzed for their costs
9. Prepare a cost model for the one-time and ongoing costs to acquire and maintain those lands protected through the PCCP

All of the above work has now been completed allowing for the preparation of preliminary cost estimates for review by the Board, the Biological Stakeholder Working Group and the new Finance Committee.

PCCP Finance Committee

In order to assist the County with the development of the Funding Plan, a diverse group of stakeholder interests were identified and formed into a Finance Committee. Attachment D is a list of

individuals who have agreed to be members of the Finance Committee. The committee members include a diversity of interests with a background in real estate, land costs, development costs, habitat restoration, local government, and land conservation. Their role will be to assist with a number of areas related to the development of the funding plan including:

- Review of cost assumptions (The Finance Committee initiated their review of these cost assumptions at their May 30th meeting)
- Review of funding options for capital costs
- Review of funding options for operating costs during the permit term
- Review of funding options for ongoing costs – post permit term
- Review of the administrative draft funding plan documents

The recommendations of the Finance Committee will be shared with the BWG, Ad Hoc Committee, Board of Supervisors, City of Lincoln, PCWA, SPRTA and the state/federal agencies. The deliberations of the Finance Committee will help with the preparation of the funding plan and the funding chapter of the conservation strategy (Chapter 9).

Valley/Foothill Plan Areas
The PCCP conservation strategy and funding plan address impacts and conservation goals in two distinct plan areas: the Valley Plan Area and the Foothills Plan Area (See Attachment E). This accounts for significant differences between the types of natural communities that exist in the two areas, the relevant conservation strategies, the types of development projected.

The separation between the two areas generally follows the 200 foot contour elevation at which the valley floor transitions into the oak woodlands of the foothills of the Sierra Nevada.

<u>Valley Plan Area</u>
- Grasslands
- Valley Foothill Riparian
- Vernal Pool Complexes
- Large floodplains
- Rice
- Other large-scale agricultural
- Dominant pattern of development receiving coverage: Urban/Suburban with 79,000 new dwelling units and 90,000 new jobs

<u>Foothill/I-80 Plan Area</u>
- Oak Woodlands
- Valley Foothill Riparian
- Small freshwater wetlands
- Narrow floodplains or the floodplain is absent
- Small farm operations and ranching
- Dominant pattern of development receiving coverage: Rural Residential and some Urban/Suburban with 16,000 new dwelling units and 2,000 new jobs.

Conservation Strategy
The PCCP contains one overall conservation strategy that mitigates impacts associated with population and employment growth and associated land development on a list of covered species and their habitat, in addition to restoring and conserving the western Placer County landscape as a whole through activities and long-term management that improve the overall ecological function of the reserve lands

Table 3 summarizes the acreage objectives that result from the implementation of the conservation strategy. As noted in Table 3, the Valley Plan area has a significant amount of habitat restoration that is largely associated with vernal pool resources (9,000 acres of grassland and 395 acres of vernal pool wetlands restored by the end of the permit term).

Table 3
Lands to be Protected to Mitigate Impacts and to Accomplish Other Conservation via State and Federal Funding

Valley Acres Acquired/Under Management	33,000	
Foothill/I-80 Acres Acquired/Under Management	15,250	
Total Acres Acquired/Under Management		**48,250**
Valley Acres Restored	11,651	
Foothill/I-80 Acres Restored	1,285	
Total Acres Restored/Created		**12,936**

NOTE: Acres restored/created are included in acres acquired and under management. Restoration or creation results in a change in community type, such that acres of one type are acquired and, after restoration/creation, those acres are eventually under management as another type. For example, rice is restored as grassland, vernal pool grassland, and other wetlands and oak woodland and riparian habitat is restored on grasslands.

Topic No. 3 - Costs Overview

The implementation of the PCCP involves a range of types of costs. They can generally be separated into 3 major components: 1) One-time land acquisition costs in the form of acquisition of fee title or conservation easements; 2) One-time habitat restoration costs; and 3) On-going operational/management costs.

Staff and the consultants have made every effort to understand the costs associated with this program through the following initiatives:

- Contacting other agencies that have prepared or are preparing an HCP/NCCP;
- Hiring an appraiser to examine land costs in West Placer
- Consultation with staff at local mitigation banks
- Consultation with the Placer Land Trust
- Consultation with County staff including County Facility Services staff
- Researching the experience of state agencies, special districts involved in large scale land management such as park districts, open space districts, and water districts, and private parties who are presently conducting large scale land management activities
- Stakeholder group meetings representing diverse interests
- Formation of a Finance Committee with a diversity of property interests
- Carefully examining the assumptions regarding the program, while recognizing negotiations for the program content are still ongoing.

Acquisition Cost Summary

The land acquisition costs are the single largest component of PCCP implementation costs, accounting for about 60 percent of the total budget through the permit term. The cost factors used to develop the acquisition cost estimates reflect location and parcel size variables consistent with the conservation strategy. In general, it costs more per acre to acquire reserve land in the Valley Plan Area than it does in the Foothill Plan/I-80 Area. Also, smaller parcels are more expensive on a per acre basis than larger parcels. Land cost estimates are based upon an analysis conducted by the appraisal firm of Bender-Rosenthal April 2011 supplemented by analysis of recent open space land

acquisitions undertaken by Placer County and the Placer Land Trust. The estimating factors represent a reasonable average for the purpose of these planning level cost estimates. Actual values will vary depending on the specifics of the property and the transaction. Over the course of PCCP implementation, land cost estimating assumptions will be updated annually and reviewed periodically to capture changes in the PCCP land market. Costs to acquire the 48,250 acre PCCP reserve and average land cost factors are shown in Table 4 for the Valley and Foothill Plan Areas. For the purpose of the planning-level estimates, total capital costs associated with land acquisition include site improvements to secure reserve areas (fencing, gates, building stabilization/demolition, roadway repair) and an estimated five percent contingency.

Table 4
Acquisition Cost Estimate Assumptions (2012 dollars)

	Valley	Foothills/I-80 Corridor
Acres acquired	33,000	15,250
Acquiring Land (acquisition cost per acre, before site improvements)	$14,600	$9,900
Total acquisition cost	$482,576,000	$150,820,000
Total acquisition capital cost including site improvements and contingency	$503,693,000	$159,669,000

The current analysis is conservative in that it assumes that the majority of acquisitions will be through the purchase of fee title interests instead of conservation easements. The assumption is that it is easier to identify willing sellers for fee title transactions over time because property is routinely transferred and sold. Based upon the County's experiences through Placer Legacy and in discussion with local land trusts, it is more difficult to identify willing sellers for conservation easements and that trend is expected to continue. Conservation easements could, on average, reduce the cost of protection by as much as 40-50 percent for each property acquired.

Table 5 describes the assumptions on what percentage of property is purchased as fee title versus conservation easement.

Table 5
Assumptions for Type of Land Acquisition (Fee vs. Easement)

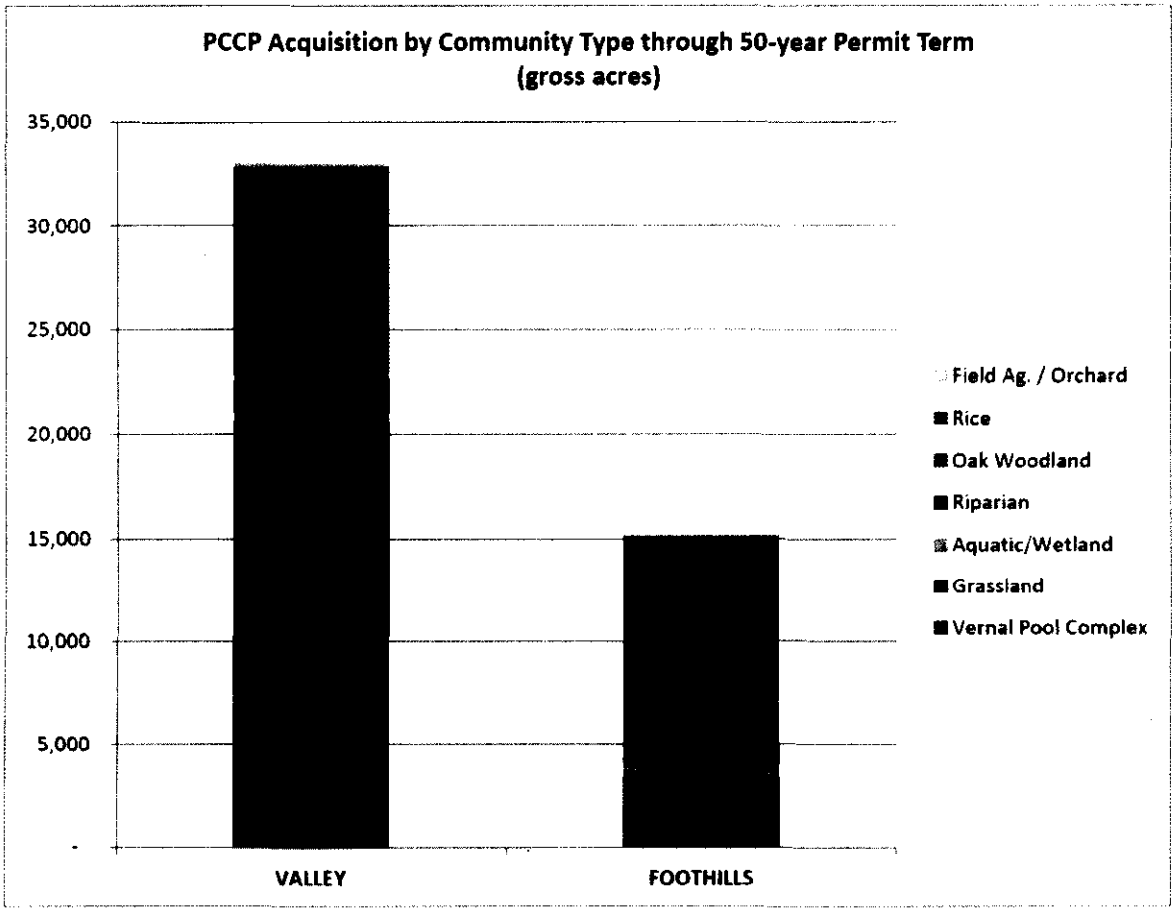
Community Type	% Fee title
Oak Woodland	60%
Valley Wetlands	95%
Valley Riparian	95%
Foothill Riparian	60%
Foothill Wetlands	60%
Valley Grassland/Vernal Pool	95%
Rice and other Agriculture	70%

Table 6 and Figure 1 provide a detailed breakdown of the anticipated land acquisition efforts of the PCCP over time for each community type. Overall 92 percent of the plan's objectives are met in three community types: grasslands/vernal pool grasslands, rice and oak woodlands.

Table 6
Acquisition Acres by Community Type

Action	Valley	Foothills/I-80	Total
Vernal Pool Complex	17,000	0	17,000
Grassland	3,600	3,400	7,000
Aquatic/Wetland	400	600	1,000
Riparian	1,600	1,000	2,600
Oak Woodland	200	10,150	10,350
Rice	10,000	0	10,000
Field Agri/Orchard	200	100	300
Total Acres	**33,000**	**15,250**	**48,250**

Figure 1



Habitat Restoration
In order to meet the biological objectives of the PCCP, it is necessary to restore certain habitat types. In particular, in order to meet the anticipated long-term regulatory obligations, a significant amount of vernal pools and other wetlands will need to be restored to meet the federal "no net loss" standard for wetlands. In addition, there are conservation actions funded by state/federal sources that will also restore a significant amount of habitat (e.g., valley foothill riparian woodland, valley oak woodland, and salmonid fish passage improvements).

Restoration efforts add significantly to the cost of the PCCP. Restoration costs account for about 20 percent of estimated PCCP permit-term implementation costs. In addition to the cost of acquiring land, it is necessary to conduct the restoration activities (estimated to be between $11,000 to $73,000/acre of restored habitat depending upon the habitat type). Moreover, in addition to these direct costs, management costs are higher to insure that the restored habitat meets performance objectives over time. Consequently more monitoring occurs, more labor-intensive site management occurs and remedial costs are incurred to correct deficiencies over time.

Table 7 and Figure 2 describe the PCCP goals for acres of habitat restoration. These acres are a subset of the 48,250 acres to be acquired. Table 8 and Figure 3 show restoration costs by habitat type. These restoration cost estimates include the construction activities associated with the restoration project as well as cost for plans, specifications, engineering, pre-construction surveys, bid assistance, construction biological monitoring, construction oversight, post-construction monitoring and maintenance, and a 15 percent restoration contingency. In addition, the PCCP proposes to invest about $4.1 million in fish passage restoration as a conservation action funded by state and federal grant programs.

Table 7
Restoration Acres by Community Type

Community Type	Valley	Foothills/I-80	Total
Vernal Pool Complex	9,000	0	9,000
Grassland	1,000	0	1,000
Aquatic/Wetland	745	116	861
Riparian	692	169	861
Valley Oak Woodland	214	0	214
Oak Woodland	0	1,000	1,000
Total Acres	11,651	1,285	12,936
Stream Miles	1.0	0.5	1.5
Note: Vernal Pool Complex restoration includes restoring vernal pools within low and medium density vernal pool complexes, grassland, rice land, and field agricultural land. The PCCP goal is 395 acres of vernal pool wetted area restored within the 9,000 gross acres.			

Figure 2

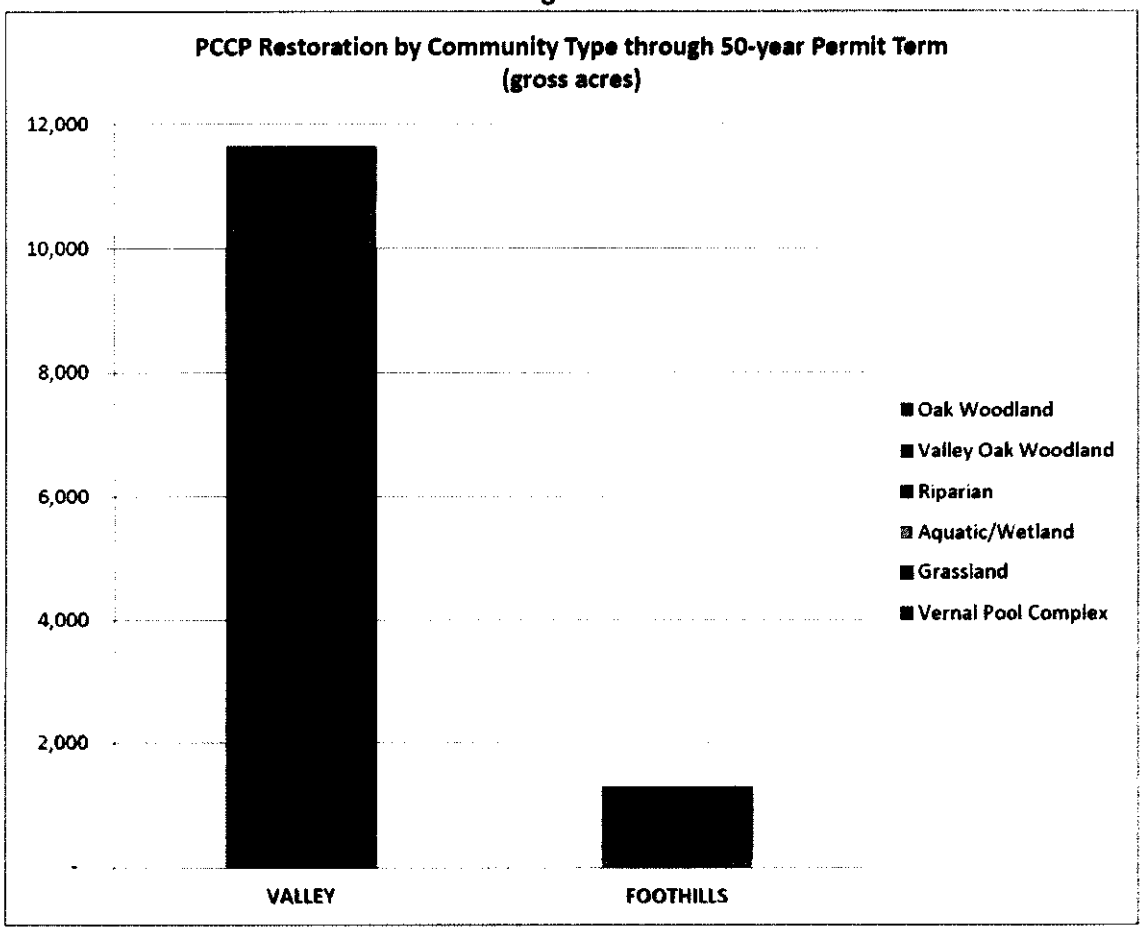
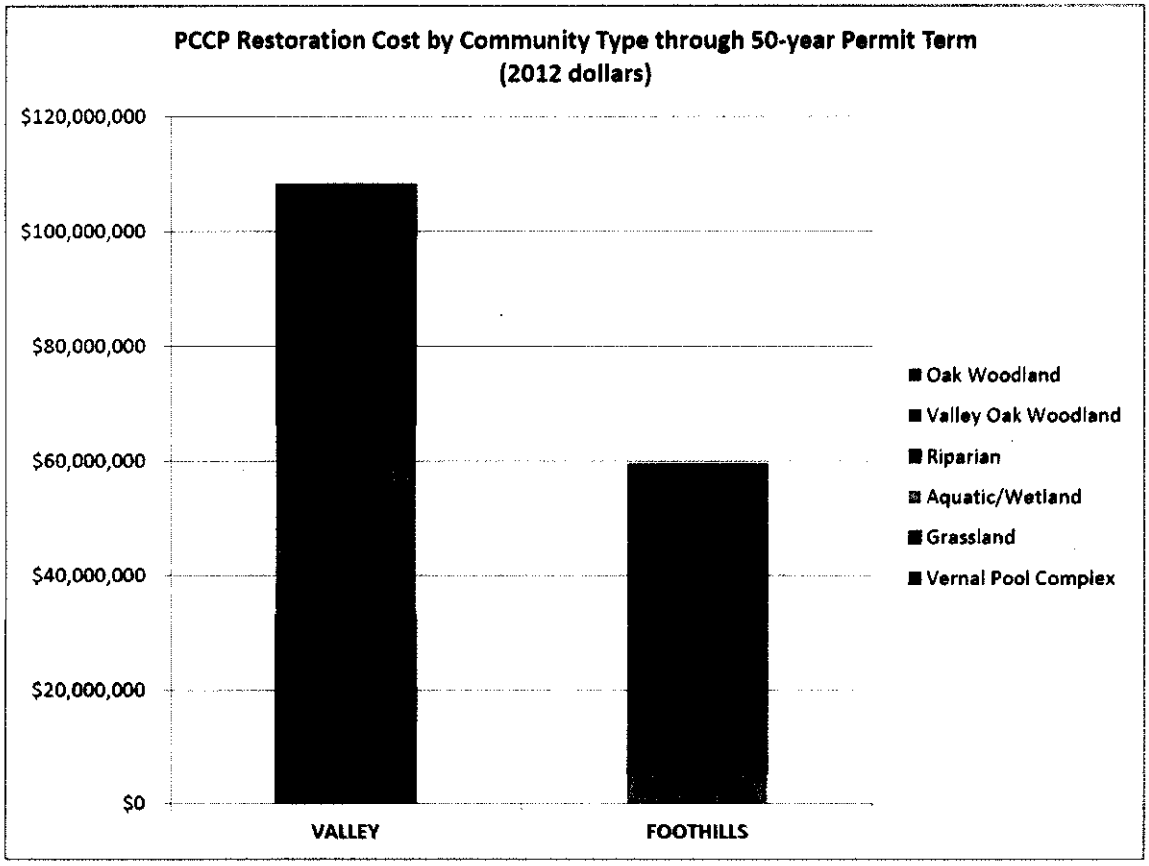


Table 8
Restoration Cost by Community Type (2012 dollars)

Community Type	Valley	Foothills	Total
Vernal Pool Complex	$21,506,000	$0	$21,506,000
Grassland	$11,621,000	$0	$11,621,000
Aquatic/Wetland	$33,050,000	$5,146,000	$38,196,000
Riparian	$32,313,000	$7,891,000	$40,204,000
Valley Oak Woodland	$9,937,000	$0	$9,937,000
Oak Woodland	$0	$46,434,000	$46,433,000
Stream Miles	$0	$0	$0
Total	**$108,427,000**	**$59,471,000**	**$167,898,000**

Figure 3



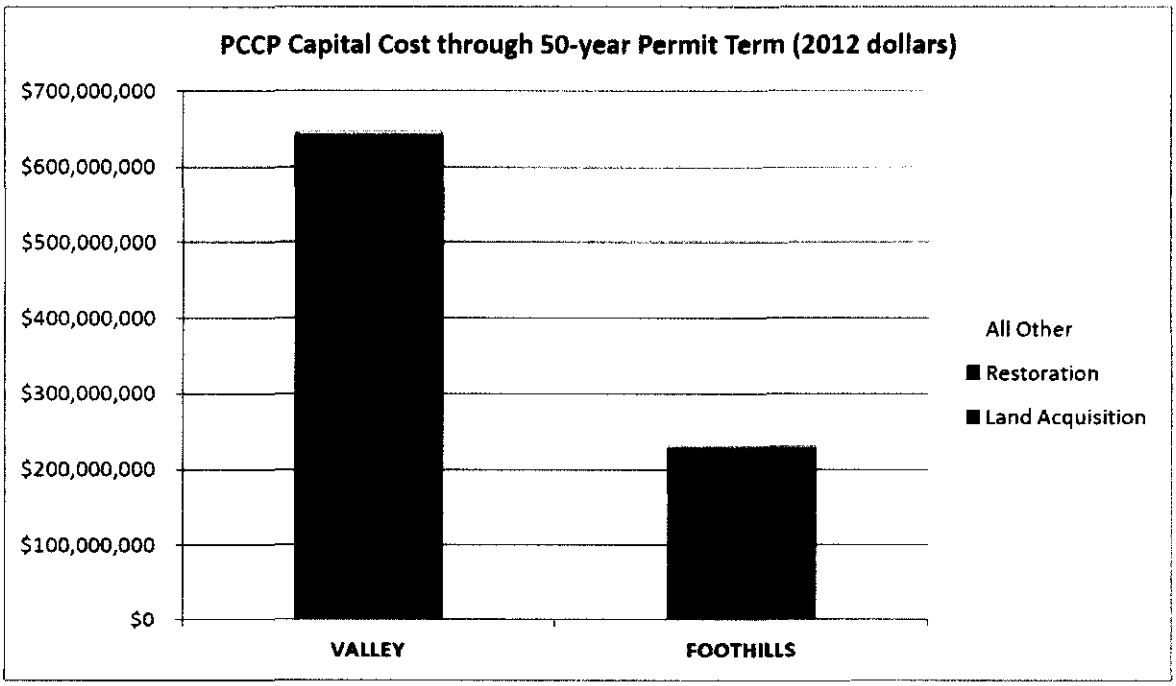
Total Capital Costs
In addition to the major one-time costs to acquire and restore reserve land, there are other capital components of the PCCP cost estimate. There are capital costs to acquire the vehicles and equipment necessary for reserve management and monitoring, including office furnishings and technology equipment. There are capital costs to develop field facilities and water supplies, and an allowance for remedial measures to respond to adaptive management findings and restore reserve lands in response to changed circumstances such as wildfire or drought. These costs are estimated in the various PCCP cost categories and total about $11.5 million, just over one percent of total PCCP capital costs of $880 million.

Table 9 and Figure 4 depict the cumulative estimate of the one-time capital costs (acquisition, restoration, land management actions, and contingency costs) for the permit term. The costs are a cumulative summary of costs to acquire and restore 48,250 acres of land.

Table 9
Summary of Cumulative Capital Costs (2012 dollars)

Cost Category	Valley	Foothills/I-80	Total
Land Acquisition	$528,877,000	$167,653,000	$696,530,000
Restoration	$111,377,000	$61,008,000	$172,385,000
Reserve Management	$7,476,000	$2,885,000	$10,361,000
Monitoring & Research	$265,000	$122,000	$387,000
Environmental Compliance	$6,000	$3,000	$9,000
Program Administration	$295,000	$136,000	$431,000
Total	$648,296,000	$231,807,000	$880,103,000

Figure 4



Operating Costs
In addition to the one-time capital costs, there are management, monitoring and administration operating costs that occur during the permit term and after the permit term concludes, as well as some overhead operating costs that are allocated to acquisition and restoration cost categories.

Table 10 and Figure 5 depict the cumulative estimate of the operational costs during the permit term—a total $215 million representing about 20 percent of the total PCCP permit-term implementation budget. Table 9 and 10 use the same cost categories but reflect distinctly different activities. For example, under the line item "land acquisition" in Table 9, we estimate that it will cost $663M to purchase all the land that is necessary to meet our biological goals and objectives and to insure that the property is secure (e.g., fencing and other site improvements). The line item "land acquisition" in Table 10 indicates that it will cost approximately $21M to do all that is necessary to

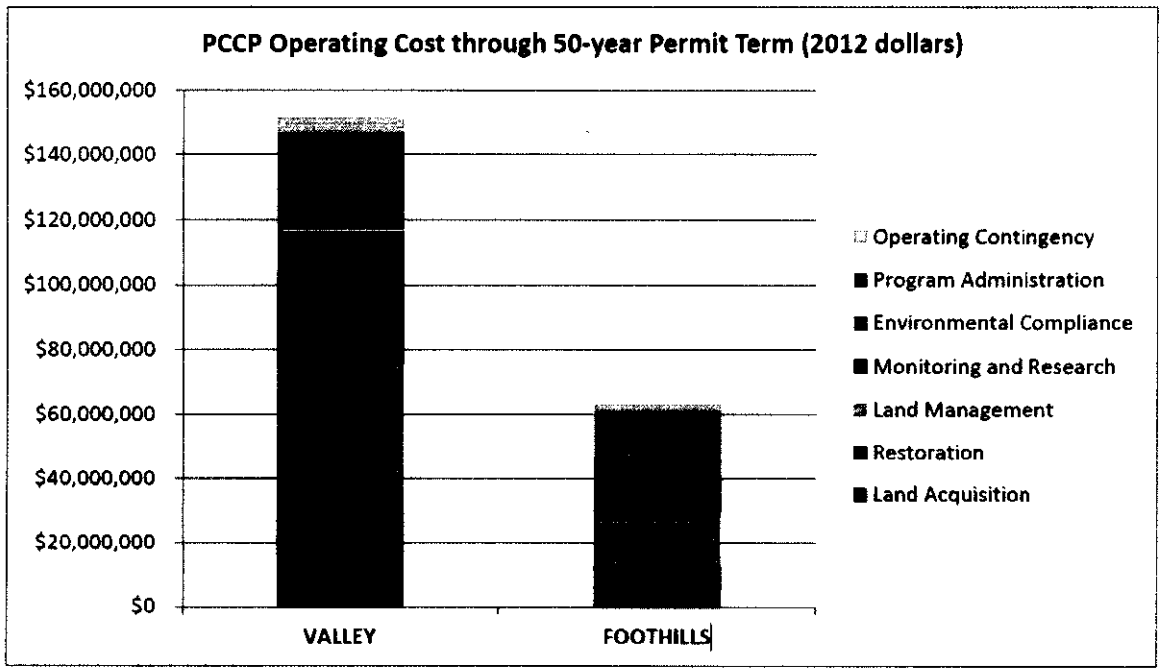
acquire land for the PCCP (escrow, due diligence, biotic surveys, real estate transaction costs, etc.). This equates to a ~3 percent overhead cost to purchase land. In another example, Table 9 estimates that the capital costs associated with restoration will be $172M. Table 10 indicates an additional operational cost for of $22M for field and technical staff to plan for and oversee the restoration activity. A list of the various cost components that are associated with the estimates summarized in Table 10 is incorporated in Attachment G.

The management of a PCCP includes significant annual costs for land management, monitoring, and program administration. These costs will initially increase over time as more land is acquired and more staffing is required to maintain the support of these lands. The actual costs per acre conserved and managed will decline over time as the level of activity decreases after initial start-up, acquisition, and restoration activities are completed and as the managing entity gains experience and begin to realize efficiencies and economies of scale. Management costs will decline when the permit term ends and acquisition and restoration activities cease. The largest ongoing cost is associated with the management of the reserve area assembled over the 50-year permit term (62 percent of all on-going costs). Program administrative costs are a relatively small percentage of the on-going costs associated with the management of PCCP (22 percent).

Table 10
Cumulative Operating Costs (2012 dollars)

Action	Valley	Foothills	Total
Land Acquisition			
Pre-acquisition planning surveys	$15,856,000	$5,162,000	$21,018,000
Due diligence			
Restoration	$14,324,000	$7,857,000	$22,181,000
Reserve Management			
Field and Technical staff			
Maintenance utilities and supplies	$45,652,000	$16,496,000	$62,148,000
Management Activities			
Monitoring & Research	$27,823,000	$11,973,000	$39,796,000
Environmental Compliance/Permitting	$13,101,000	$6,054,000	$19,155,000
Program Administration			
Staff	$30,134,000	$13,925,000	$44,059,000
Overhead and Program Costs			
Operating Contingency	$4,655,000	$1,943,000	$6,598,000
Total	**$151,545,000**	**$63,410,000**	**$214,955,000**

Figure 6



Post Permit Management and Program Administration Costs
The post permit costs require a consistent and reliable stream of revenue over time. The staff and consultants are reviewing a number of alternatives including the use of endowments, fees, assessment districts, community facilities districts and other mechanisms.

Staff will present recommendations to the Board on how to fund the on-going post-permit costs once the final PCCP mitigation strategy has been determined and the draft funding plan is ready for public

review. Table 11 provides summary information on the post permit annual costs that will need to be funded in perpetuity. Current estimates are that it will require about $2.6 million per year to administer and manage the 48,250 acre reserve and conduct limited habitat and species monitoring after the permit term has concluded. At $55 per acre managed, this is lower than the average annual cost per acre during the permit term, (about $90 per acre) because the PCCP is no longer responsible for on-going costs associated with land acquisition, restoration, and environmental compliance, and management and monitoring and administrative activities can be reduced.

Table 11
Estimated Annual Ongoing Costs – Post Permit Term (2012 dollars)

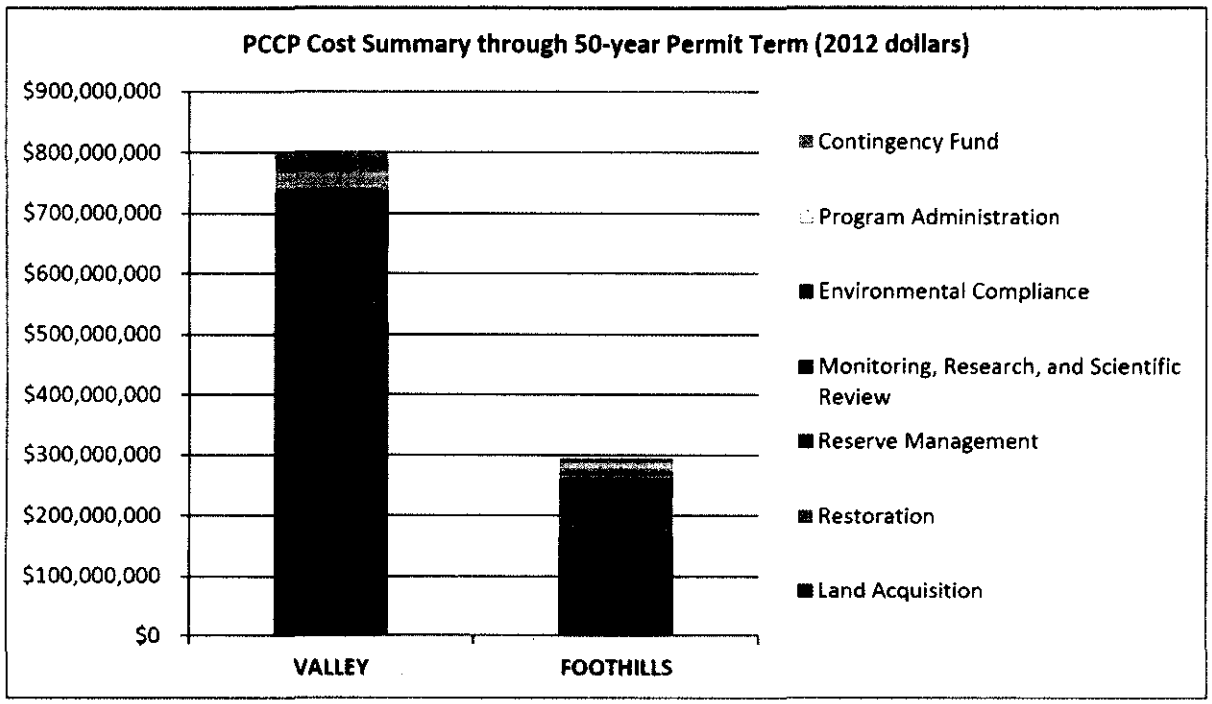
Operating Budget	
Land Acquisition	$0
Habitat Restoration/Enhancement	$0
Reserve Management	$1,612,000
Monitoring, Research, and Scientific Review	$425,000
Environmental Compliance	$0
Program Administration	$573,000
Contingency	$0
Total Annual Costs	**$2,609,000**
Capital Budget	
Land Acquisition	$0
Habitat Restoration/Enhancement	$0
Reserve Management	$40,000
Monitoring, Research, and Scientific Review	$7,8006
Environmental Compliance	$0
Program Administration	$4,000
Contingency	$0
Total Annual Costs	**$51,600**
TOTAL BUDGET	
Land Acquisition	$0
Habitat Restoration/Enhancement	$0
Reserve Management	$1,652,000
Monitoring, Research, and Scientific Review	$433,000
Environmental Compliance	$0
Program Administration	$577,000
Contingency	$0
Total Annual Costs	**$2,661,000**
Total Annual Cost per Acre Managed (48,250 acres)	**$55**

Summary on Cost Estimates
Table 12 summarizes the cumulative total of the capital and operating costs over the permit term (i.e., a combination of all costs referenced in Tables 9 and 10).

Table 12
Cumulative Capital and Operating Costs through the 50-year Permit Term

Action	Valley	Foothills	Total
Land Acquisition	$519,549.000	$164,831,000	$684,380,000
Restoration	$125,701,000	$66,866,000	$194,567,000
Reserve Management	$53,128,000	$19,381,000	$72,509,000
Monitoring & Research	$28,087,000	$12,095,000	$40,182,000
Environmental Compliance	$13,106,000	$6,057,000	$19,163,000
Program Administration	$30,429,000	$14,061,000	$44,490,000
Contingency	$29,840,000	$9,926,000	$39,766,000
Total	**$799,840,000**	**$295,217,000**	**$1,095,057,000**

Figure 5



A number of factors could reduce the costs referenced in the Tables above reducing the conservation strategy goals, acquiring a higher percentage of conservation easements versus fee title, achieving significant economies in restoration activities, establishing revenue generating activities on reserve lands, etc. Conversely other factors could increase these costs including land cost inflation, increased administrative costs, increased adaptive management obligations, and changes to the regulatory environment during the preparation of the PCCP (e.g., new state wetland requirements). The cost estimates presented here will be refined during the Finance Committee review. The final cost estimates will be the best available planning-level estimates and will serve as a reasonable basis for developing the PCCP Funding Plan.

Lastly, it is not possible for staff to insure to the Board at this time that the above costs will not, in some way, result in funding support from the County in order to insure implementation of the plan.

Topic No. 4 - PCCP Coverage Area Boundary Adjustment

Staff is recommending that the eastern boundary of the PCCP be adjusted to insure that the current and future boundary of Sewer Maintenance District No. 1 (SMD-1) be incorporated into the PCCP. This adjustment would increase the size of the coverage area by 13,755 acres. All of the 13,755 acres is part of the Potential Future Growth Area. No portion of the addition is included in the Reserve Acquisition Area (RAA). The only reserve component are the stream side buffers along intermittent and perennial streams. If this recommendation is approved, the PCCP coverage area boundary will be that which is depicted in Attachment I.

When the County released the Notice of Preparation and Notice of Intent for the EIR/EIS in 2004, the original boundary of the PCCP extended easterly to the easternmost edge of the Coon Creek watershed (See Attachment H). In 2007, at the request of Supervisor Kranz, and with the concurrence of the Board of Supervisors, the District 5 area was removed from the PCCP. In 2010, the boundary shifted back in an easterly direction to its current boundary as depicted in Attachment A.

The primary reason for the current request to move the coverage area boundary further to the east is to insure that impacts on endangered species, within SMD-1 service area, are addressed through the PCCP conservation strategy. As part of the discussions with the U.S. Fish and Wildlife Service (FWS) on the Regional Sewer project, it was concluded that the best way to address the potential indirect impacts of the Regional Sewer project (e.g., potential for growth inducement from improved sewer capacity) would be to utilize the conservation strategy of the PCCP for future impacts upon endangered species.

The impact to landowners is that the PCCP's regulatory coverage will be extended to landowners in this area. Without shifting the boundary, individual landowners who have impacts to endangered species in the area (e.g., valley elderberry longhorn beetle or California red-legged frog) will have to consult with the FWS on a project-by-project basis for any impacts they may generate on those species. Similarly with wetland impacts, which tend to be very small in this area, incorporation into the PCCP area will allow landowners to see their permit approvals through Placer County and not the COE.

It is entirely possible that PCCP coverage area boundaries could shift again. Consequently, this adjustment is for planning purposes only. It is consistent with the boundary that was presented in the NOP/NOI and as such, the shift in the boundary does not impact the analysis or the timeline for completion. Lastly, this boundary adjustment is expected to assist with the permitting for the Regional Sewer project in that it will clarify how future federal regulatory issues related to endangered species will be addressed as SMD-1 services expand to accommodate buildout of the sewer district and the community plans that cover this area.

Topic No. 5 – Clean Water Act Compliance

As of late, there have been a number of questions asked about the County's proposed method of providing programmatic compliance with the Federal Clean Water Act as it relates to impacts on wetlands. Since the inception of the work program, the County has proposed to address federal wetland permitting in the PCCP and to integrate federal wetland requirements and procedures into our local land development review process (including CEQA). Wetland permitting entails a regulatory process that is entirely separate from endangered species permitting and consequently requires a different approach in the PCCP. As with the endangered species issue, it is the County's intention to negotiate with the appropriate federal agencies to gain permitting authority for wetlands to the extent possible, and to improve efficiency and coordination with federal wetland permitting to the extent that it cannot be delegated to the County. The goal is to establish a more streamlined and more efficient wetland permitting process that is managed at the local level to greatest extent possible.

County Aquatic Resources Program (CARP)

As a part of the overall PCCP process, the County is preparing a County Aquatic Resource Program (CARP), a local program for the analysis, avoidance, minimization, and mitigation of impacts to Waters of the United States and other aquatic resources. The CARP will provide an opportunity to comply with federal regulations through the implementation of local procedures at the County and City of Lincoln. There are two key elements of the CARP's CWA compliance program: 1) a programmatic general permit (PGP) and 2) a letter of permission (LOP). For projects with a large amount of wetland fill an individual permit would be issued by the COE, but the process of impact assessment would be conducted locally, the federal permitting process would run concurrently with the local process, and the mitigation measures would be derived from the CARP.

At the lowest tier is the PGP for very small impacts. The PGP permitting process would occur entirely at the local level and is proposed to apply to projects with minor impacts to wetlands and streams. Such projects would represent the majority of permit activity that the County would review on a day-to-day basis, although the total amount of area would be small on an annual basis. A typical project would be a small grading permit that has a small amount of wetland or a small stream/drainage area that needs to be crossed or modified.

For the second tier of projects (i.e., small to medium sized projects with more than minimal wetland fill or stream impact), the COE proposes to develop a streamlined review procedure ("letter of permission procedure") that would occur at the same time that environmental review was being conducted at the local level. The COE could issue a letter of permission within 60 days or less after the environmental document was completed and/or local entitlement issued. The mitigation measures would be based upon compliance with the CARP.

For the third tier of projects, (i.e., projects with a large amount of wetland fill), the COE would issue a standard individual wetland permit, but the federal permitting process would run concurrently with local environmental review. The County or the City of Lincoln would analyze the effects of the project during environmental review and develop mitigation measures consistent with the PCCP and the CARP. The COE would participate in the local environmental review process to ensure that the PCCP/CARP mitigation measures meet the requirements for a federal wetland permit. The COE would carry out environmental review under the National Environmental Policy Act or NEPA at the same time that the County or City carry out environmental review under CEQA. Project-specific environmental review of projects and activities authorized by the CARP would also be based on, or will "tier" from, the PCCP EIS/EIR. This will limit the scope of environmental review, shorten the preparation time of the documents and insure that local and federal mitigation requirements are consistent and are not redundant.

Status Quo – 0.10 acre of wetland area or more
Today, any impacts to wetlands require a COE permit prior to the impact occurring. A proponent seeking to fill a wetland must comply with one of two types of permits, a nationwide permit or an individual permit. As a condition of a COE permit, the proponent must obtain a Section 401 Water Quality Certification from the California Regional Water Quality Control Board. In most cases, there is considerable delay today procuring these permits, even for the simplest of projects. Delays may be caused by insufficient staffing at the COE to process permits, the length of time it takes to acquire the necessary data to apply for a permit, and competing regulatory requirements from other agencies. In contrast to the proposed CARP, the status quo regulatory environment would typically yield the following time frames:

- 0 – 0.5 acre of wetland fill - Nationwide Permit requiring **0.5-1.5 years**
- <0.5 – 1.0 acre of wetland fill – Letter of Permission (abbreviated IP) Permit requiring 0.5-1.5 years
- <1-5 acres of wetland fill - Individual Permit requiring **1.5-2 years**
- <5-20 acres of wetland fill - Individual Permit requiring **1.5-4 years**

It is important to note that the CARP would provide an improved regulatory environment for the numerous public and private sector projects that will have an effect on federal wetlands, regardless of whether the a project fell under the PGP, LOP or individual permit process. With the PGP, a local ordinance is adopted which results in a higher level of certainty. With the LOP or individual permit process, the COE retains permitting authority but the application of avoidance/minimization and mitigation measures will be consistent with the approved PCCP conservation strategy.

In all cases, it's important to note that the COE retains the authority to require permitting. The County's CARP is intended to significantly improve the current process; not replace it.

Memorandum of Understanding
One of the agreements that will be executed when the PCCP is complete is a memorandum of understanding (MOU) between the participating agencies and the U.S. Army Corps of Engineers. This MOU will help to insure that the certainty and streamlining that the participating agencies' seek, and the regulatory efficiency that the COE seeks, will be embodied in an agreement.

Specifically, the MOU would describe how the National Environmental Policy Act ("NEPA"), California Environmental Quality Act ("CEQA") and Clean Water Act ("CWA") Section 404 processes would be integrated for projects and activities that are covered under the PCCP and CARP. The CARP will include detailed project application requirements for projects that would impact wetlands and streams, an environmental review process, and measures to avoid, minimize, and mitigate adverse effects. These requirements and measures can be used to comply with environmental review and mitigation requirements under CWA, NEPA and CEQA. By integrating Section 404, NEPA and CEQA processes with the PCCP and CARP environmental review and mitigation program, the MOU would facilitate:

- more timely decision-making;
- better informed decisions;
- greater consistency in decisions;
- reduced redundancy in environmental review; and
- consistency in avoidance, minimization, and mitigation requirements under NEPA, CEQA, Section 404, the federal Endangered Species Act ("ESA") and the state Natural Community and Conservation Planning Act ("NCCPA").

For projects authorized through the Programmatic General Permit, the County and City of Lincoln would establish a time frame in which they would issue a permit for wetland and stream. For the larger projects, the COE would issue the permits under a streamlined permitting process that is integrated with the County's and City's environmental review and permitting process. The PCCP/CARP and the subject MOU would establish integrated procedures that ensure that NEPA and CEQA review are completed concurrently, such that Section 404 Permitting and take authorization under the PCCP can occur concurrently.

There is a significant level of stakeholder interest in this MOU because it would clarify how the PCCP and CARP can streamline wetland permitting authorized under the federal Clean Water Act.

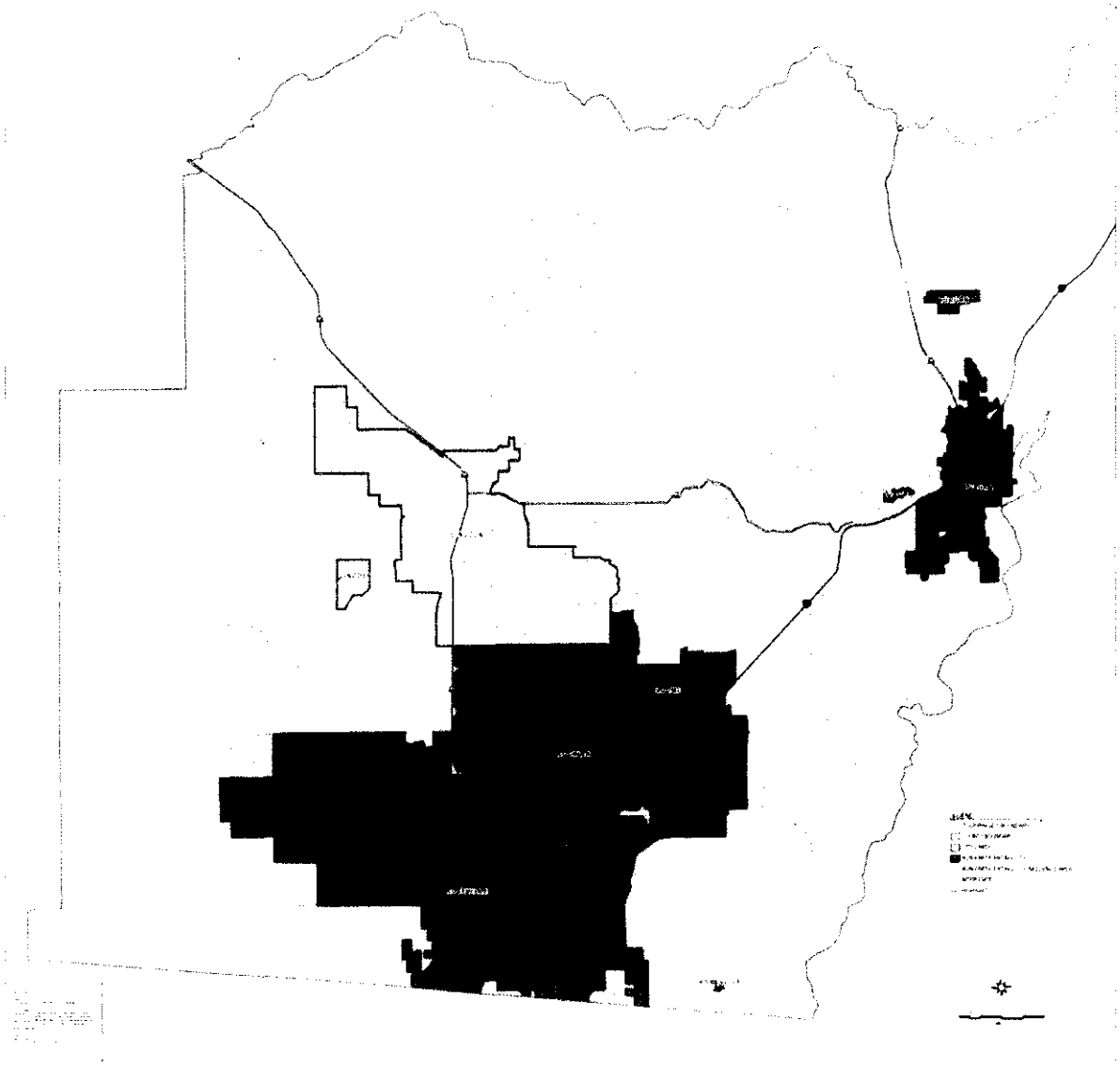
ATTACHMENTS: The following attachments are provided for the Board's consideration

Attachment A:	PCCP Coverage Area Boundary
Attachment B:	Covered Species List
Attachment C :	Summary of PCCP Conservation Strategy BMP Measures
Attachment D:	Finance Committee Roster
Attachment E:	Valley/Foothill Plan Areas
Attachment F:	Economic Forecast Projection Areas
Attachment G:	Summary of Operational Cost assumptions
Attachment H:	SMD-1 Current and Anticipated Future Boundary and the original NOP/NOI boundary
Attachment I:	Revised PCCP Coverage Area Boundary

cc: Rod Campbell, City of Lincoln
Heather Trejo, PCWA
Celia McAdams, PCTPA
Mark Morse, City of Roseville
Chris Beale, Resources Law Group
BWG Members
Sally Nielsen, HEG
Robert Spencer, Urban Economics

Attachment A
Current PCCP Coverage Area Boundary – May 2013

PCCP PHASE 1: BASE MAP



Attachment B
Covered Species

The PCCP proposes coverage for the state and federal special status species:

1. Listed species administered by the USFWS and/or CDFG: a) Endangered species: vernal pool tadpole shrimp *(Lepidurus packardi);* b) Threatened species: vernal pool fairy shrimp *(Branchinecta lynchi);* valley elderberry longhorn beetle *(Desmocerus californicus dimorphus);* bald eagle (wintering) *(Haliaeetus leucocephalus);* California red-legged frog *(Rana aurora draytoni);* giant garter snake *(Thamnophis gigas);* and California tiger salamander *(Ambystoma californiense.* Listed species administered by CDFG: Swainson's Hawk *(Buteo swainsoni);* American peregrine falcon (wintering) *(Falco peregrinus anatum);* California black rail *(Laterallus jamaicensis);* Bank swallow (nesting) *(Riparia riparia).*

2. Listed species administered by NOAA Fisheries: a) Endangered species: Sacramento winter-run hinook salmon *(Oncorhynchus tshawytscha);* b) Threatened species: Central Valley steelhead *(Oncorhynchus mykiss);* and c) candidate species: Central Valley fall/late fall-run chinook salmon *(Oncorhynchus tshawytscha).*

3. The following 16 unlisted animal species may become listed during the term of the permit: Bogg's Lake Hedge-hyssop *(Gratiola heterosepala);* Foothill yellow-legged frog *(Rana boylii);* California burrowing owl *(Athene cunicularia);* Western spadefoot toad *(Scaphiopus hammondii);* Northwestern pond turtle *(Clemmes marmorata marmorata);* Northern harrier (nesting) *(Circus cyaneus);* Ferruginous hawk (wintering) *(Buteo regalis);* Rough-legged hawk (wintering) *(Buteo lagopus);* Cooper's hawk (*Accipiter cooperii*); loggerhead shrike (*Lanius ludovicianus*); Yellow warbler (nesting) *(Dendroica petechia);* Yellow-breasted chat (nesting) *(Icteria virens);* Modesto song sparrow *(Melospiza melodia mailliardi);* Grasshopper sparrow *(Ammodramus savannarum);* Tricolored blackbird (nesting) *(Agelaius tricolor);* and Yellow-billed cuckoo (Coccyzus americanus).

4. The following four unlisted plant species may become listed during the term of the permit: dwarf downingia *(Downingia pusilla);* legenere *(Legenere limosa);* Ahart's dwarf rush *(Juncus leiospermus* var. *ahartii);* and Red Bluff dwarf rush *(Juncus leiospermus* var. *leiospermus).*

Attachment C
Summary of PCCP Conservation Strategy BMP Measures

Categories of conditions (Chapter 6 of the Plan)

The PCCP groups conditions according to their purpose. For ease of reference and to facilitate incorporation in project permits issued by the Permittees, the conditions are given identity codes reflecting their type:

- **General conditions (GEN).** General conditions include the assessment of fees for land conversion and other effects and application of Best Management Practices to reduce potential effects on covered species and natural communities.
- **Stream System conditions (SS).** Conditions to avoid and minimize impacts to the Stream System include incorporation of the County Aquatic Protection Program (CARP). The CARP (Appendix M) describes specific requirements to protect stream and riparian systems and to maintain and enhance connectivity between natural communities and habitat for covered species.
- **Natural Community conditions (NC).** Specific avoidance and minimization conditions on covered activities in certain habitat types may apply.
- **Species conditions (SPP).** Where activities may affect individual covered species or potential for take can be avoided or reduced through specific actions such as appropriate species surveys, application of BMPs, seasonal restrictions, or protective setbacks. The Plan also specifies conditions to prevent take of individuals of fully protected species.
- **Reserve management conditions (RES).** Conditions apply to management of the reserve lands.

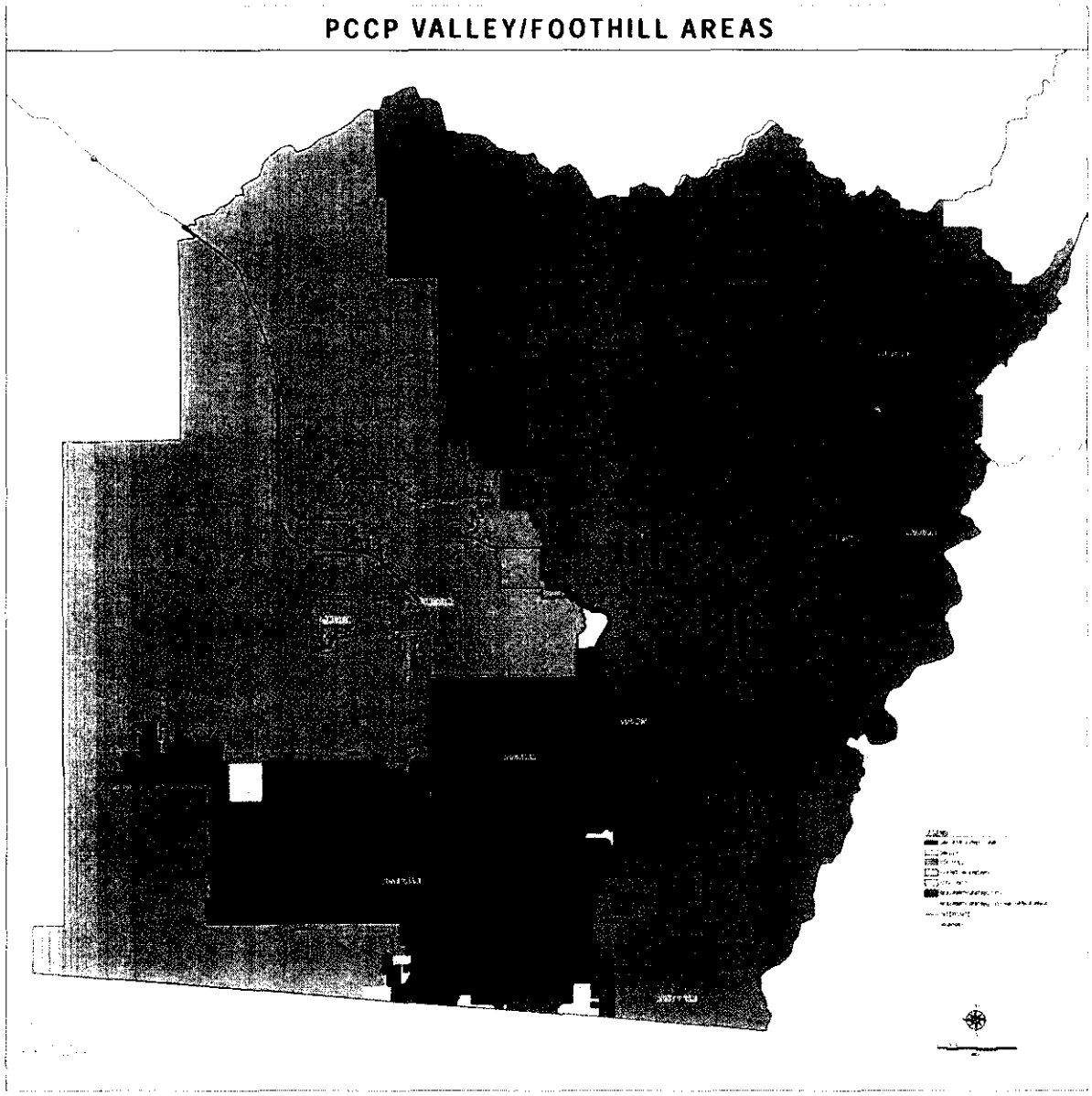
Attachment D
Finance Committee Roster

PCCP Finance Committee Representatives (May 2013)		
	Member and Alternate	**Representing**
1	Gregg McKenzie, Restoration Resources 3888 Cincinnati Avenue Rocklin, 95765 (916) 408-2990 gmckenzie@restoration-resources.net	Landowners/ Conservation
2	Cindy Tambini, Wildland Inc 3855 Atherton Road Rocklin, CA 95765 phone: (916) 435-3555 ctambini@wildlandsinc.com	Landowners/ Conservation
3	Jessica Daugherty, Placer Land Trust *Justin Wage, Placer Land Trust (Alternate)* 11521 Blocker Dr., #100 Auburn, CA 95603 (530) 887-9222 jessica@placerlandtrust.org justin@placerlandtrust.org	Landowners/ Conservation
4	Ben Herb, Placer County Association of Realtors *Dean Anderson (Alternate)* 4750 Grove Street Rocklin, CA 95677 (916) 624-8271 bherb@c21selectgroup.com DAnderson@pcaor.com	Broker
5	Peter Nixon, CBRE 1512 Eureka Road, Suite 100 Roseville, CA 95661 (916) 781-4819 peter.nixon@cbre.com	Broker
6	Marcus Lo Duca, Lo Duca & Avdis, LLC 3200 Douglas Blvd, #300 Roseville, CA 95661 (916) 774-1636 mloduca@loducalaw.com	Landowners/ Development
7	Clifton Taylor, Richland Communities 1508 Eureka Road, Suite 140 Roseville, CA 95661 Phone # 916.782.3330 ctaylor@richlandcommunities.com Secretary: Annalisa Trieu Annalisa@richlandcommunities.com	Landowners/ Development
8	David F. Jarrette P.O. Box 1011 Grass Valley, CA 95945-1011 (530) 477-8139 dfjarrette@hotmail.com	Appraiser

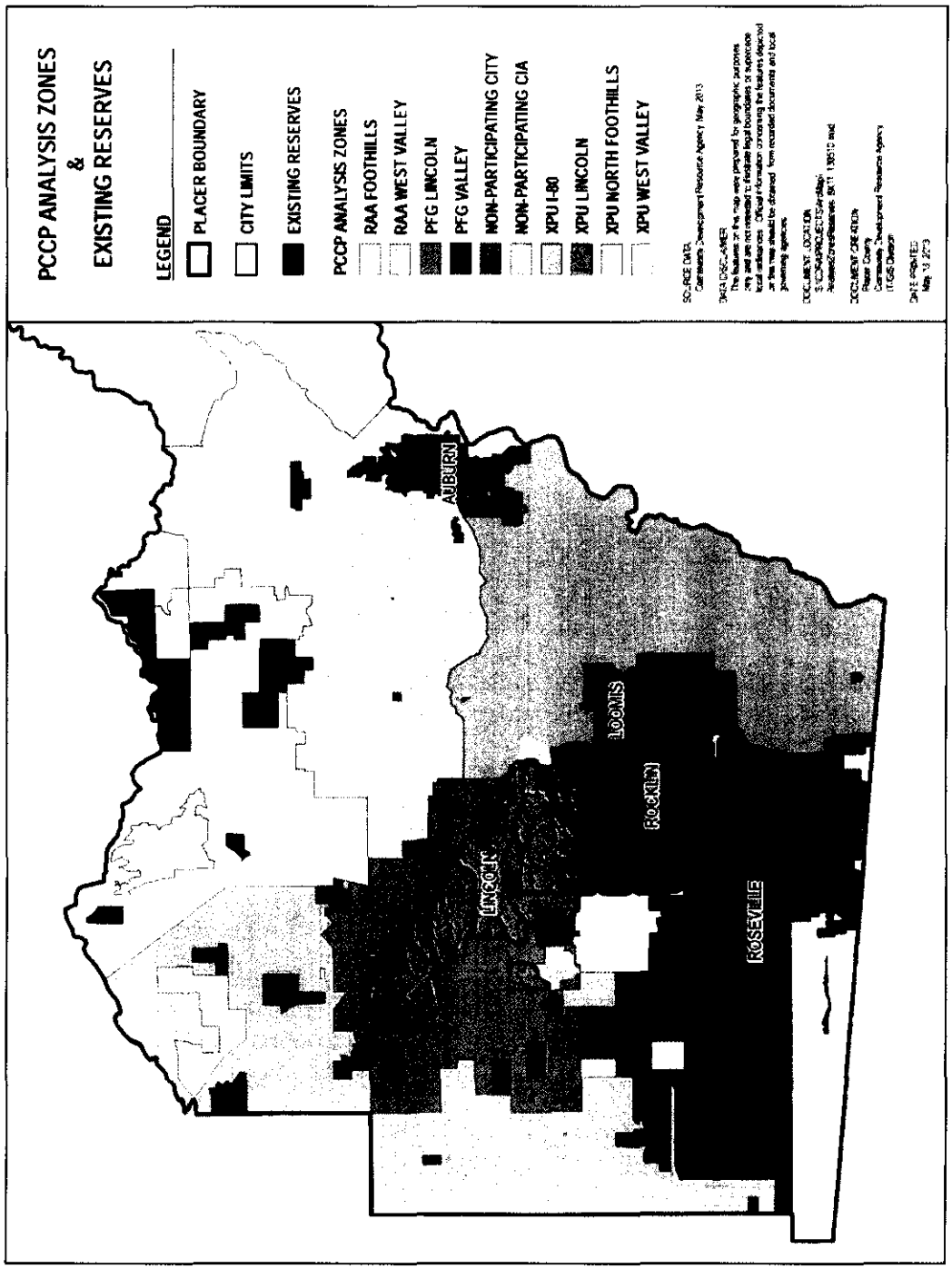
9	Terry Davis, Sierra Club 909 12th Street, Suite 202 Sacramento, CA 95814 (916) 557-1100 ext. 108 terry.davis@sierraclub.org	Environmental
10	Primo Santini 521 G Street Lincoln, CA 95648 916-645-3333 psantini@cornerstoneinsurance.net	Broker
11	George T. Kammerer P.O. Box 951 Sloughhouse, CA 95683 (916) 612-0407 GTKammerer@gmail.com	Landowners/ Development
	Participating staff members	
	Heather Trejo P.O. Box 6570 Auburn, CA 95604 (530) 823-4905 htrejo@pcwa.net	PCWA
	Rod Campbell 600 Sixth Street Lincoln, CA 95648 (916) 434-2470 rcampbell@ci.lincoln.ca.us	City of Lincoln
	Mark Morse 311 Vernon St Roseville, CA 95678 (916) 774-5334 MMorse@roseville.ca.us	City of Roseville
	Loren Clark 3091 County Center Drive Auburn, CA 95603 (530) 745-3016 lclark@placer.ca.gov Chris Beale, Resources Law Group 555 Capitol Mall, Suite 1090 Sacramento, CA 95814 (916) 442-4880 cbeale@resourceslawgroup.com Jennifer Byous 3091 County Center Drive Auburn, CA 95603 (530) 745-3008 jbyous@placer.ca.gov	Placer County

	Aaron Gabbe TRA 545 Middlefield Road, Suite 200 Menlo Park, CA 940 gabbe@traenviro.com (650) 400-7029 Mary Dietrich 11476 C Avenue Auburn, CA 95603 530.886.4957 MDietric@placer.ca.gov Andy Fisher 11476 C Avenue Auburn, CA 95603 (530) 889-6819 AFisher@placer.ca.gov Allison Carlos 175 Fulweiler Ave, Auburn, CA 95603 (530) 889-4027 ACarlos@placer.ca.gov Kristen Spears, County Assessor 2980 Richardson Drive Auburn, CA 95603 530-889-4309 kspears@placer.ca.gov Gary Powell, Assessor's Office (Alternate) gpowell@placer.ca.gov Sally Nielsen, Hausrath 1212 Broadway, Ste 1500 Oakland, Ca 94612-1817 (510) 839-8383 sn@hausrath.com Robert D. Spencer, Urban Economics 1135 Clarendon Crescent Oakland, CA 94610 (510) 816-9458 Bobinoakland@gmail.com	

Attachment E
Valley/Foothill Plan Areas
(with the adjusted eastern boundary)



Attachment F
Economic Forecast Projection Areas



Acronyms: RAA = Reserve Acquisition Area, PFG = Potential Future Growth Area, XPU = Existing/Planned Urban and CIA = City Influence Area

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Attachment G
Summary of Operational Cost Assumptions

Land acquisition operating budget:

- Contractors to conduct pre-acquisition **planning surveys and site assessments**: to verify biological resources in the field, evaluate infrastructure and other site conditions and restoration and enhancement potential.
- **Due diligence:** appraisals, boundary surveys, legal description, title insurance and other due diligence and closing costs for land acquisition transactions.

Restoration operating budget:

- Restoration planning, design, and implementation is accomplished through a combination of contractors with PCA staff oversight and management.
- PCA Field and Technical staff: allocated across restoration, reserve management, and monitoring activities
  - Senior Scientist
  - Preserve/Project Manager
  - Wetland Biologist
  - Technical Staff
  - Preserve Maintenance Staff
- The restoration operating budget includes the PCA field and technical staff and associated overhead allocated to oversight of restoration activities.

Reserve management operating budget:

- PCA field and technical staff and associated overhead allocated to oversight of reserve management activities.
- Agricultural advisory services: part time staffing position
- Field facilities maintenance and utilities
- Management equipment and tools: hand tools and landscaping equipment
- Reserve management plans
- Reserve and site management activities: fencing, gates, signage, water supply maintenance, trash and debris removal
- Waterway maintenance and protection: clearing debris and dredging
- Wildlife management: controlling feral pigs, wild turkeys, and beavers
- Invasive species and fuels management: combination of grazing and hand and mechanical treatments, mastication, and prescribed burning as needed.

Monitoring operating budget:

- PCA field and technical staff and associated overhead allocated to oversight of monitoring activities
- Monitoring contractors:
  - inventory phase—to inventory and document of baseline conditions, and develop monitoring plans, with direction and oversight by PCA staff and Independent Science Advisory Group,
  - targeted studies—to develop conceptual models for species and habitat, test monitoring protocols, and conduct pilot project and directed research,
  - long-term monitoring—status and trends monitoring of landscapes, natural communities, and species
- Stipends for Independent Science Advisory Group

Environmental Compliance operating budget:

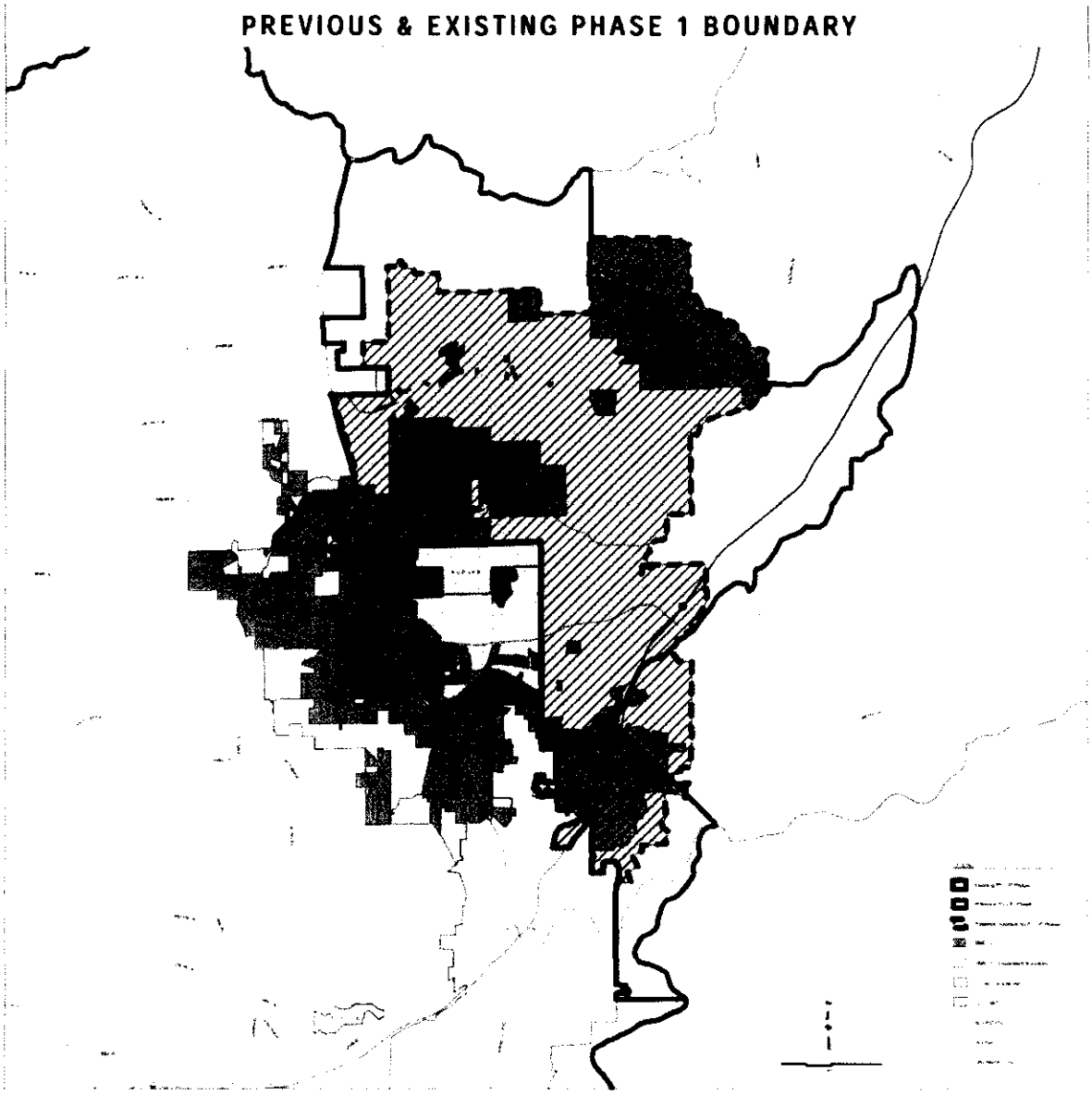
- Prepare notifications and reports
- All necessary application and permitting fees.
- Compliance costs triggered by PCCP restoration projects and some infrastructure projects related to land management.
- Program staff responsible for some environmental compliance costs, including managing the permitting process.
- PCA staff conduct cultural resource and archeological surveys and prepare Section 106 cultural resource reports. PCA staff prepare CEQA and NEPA Categorical Exemptions and Mitigated Negative Declarations.
- Staff (1 FTE) and associated overhead as well as reporting and permitting fees.

Program administration operating budget:

- All other PCA staff and associated overhead
  - Executive Director
  - IT- Database / GIS Management
  - Budget Analyst
  - Acquisition Specialist
  - Grant Specialist/Conservation Planner
  - Admin – Secretary
- PCCP compliance monitoring
- Annual reporting
- Legal assistance
- Periodic financial review
- Law enforcement/public safety
- Public education/outreach

Attachment H
SMD-1 Current and Anticipated Future Boundary
And the original NOP/NOI boundary

1. The blue line represents the PCCP coverage area boundary when the NOP/NOI was released.
2. The current SMD-1 boundary is depicted in the darker burnt orange color.
3. The anticipated future SMD-1 boundary is the lighter burnt orange color.



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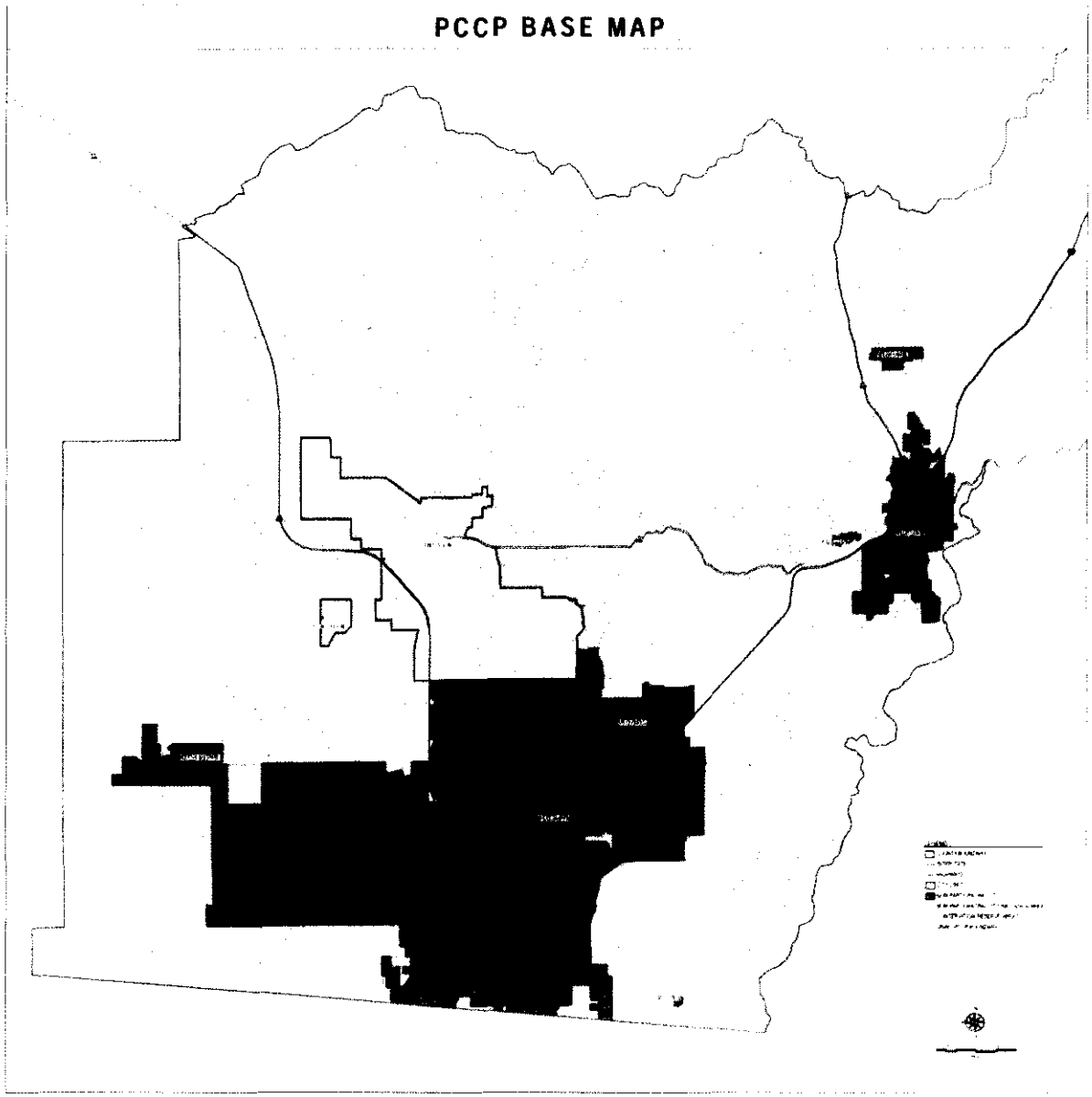
Attachment I
Proposed PCCP Boundary – June 2013



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