

**El Dorado County  
Board of Supervisors  
Workshop:  
Regional Planning and  
Compliance Alternatives**

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# **Alternative Planning & Compliance Approaches**

- INRMP only
- INRMP and Separate Rare Plants MOU
- Joint INRMP/HCP/NCCCP
- Joint INRMP/HCP/CESA 2081
- INRMP followed by HCP/CESA 2081

# INRMP Only

- INRMP following GP Policies
- ESA/CESA compliance continue project x project
- Benefits
  - INRMP completed on County's schedule (not FWS/DFG)
- Constraints
  - No ESA/CESA permits for listed species
  - No “no surprises” coverage for unlisted species
  - EID, County, Developers must seek their own separate permits with each new project
  - No Sec 6 grant funding available

# **INRMP and Separate Rare Plants MOU**

- INRMP following GP Policies
- Conservation Plan MOU for Pine Hill Plants
  - FWS Section 7 Consultation on MOU for 5 federal listed plants
  - CESA permit for Stebbins' Morning Glory
  - NPPA formal agreement for 4 listed rare plants
  - County CEQA document for 8 listed and unlisted plants

# **INRMP and Separate Rare Plants MOU (continued)**

## **■ Benefits**

- INRMP completed on County's schedule (not FWS/DFG)
- Focused approach to compliance for listed Pine Hill Plants (likely shorter and less expensive than regional HCP)

## **■ Constraints**

- No ESA/CESA compliance for listed animals (7 species)
- No “no surprises” coverage under ESA/NCCPA (including about 10 species of unlisted animals and plants)
- MOU approach not legally well tested; Section 7 consultation for plants could be reopened by FWS should conditions change substantially
- No Sec 6 grant funding available

# Joint INRMP/HCP/NCCP

- Benefits
  - Take permit for all covered species, including listed and unlisted plant and animal species
  - “No surprises” assurances under the ESA and NCCPA
  - Section 6 funding available to pay for planning
- Constraints:
  - Longer time to complete final documents due to ESA/NCCPA approval processes
  - More expensive than INRMP w/Plants MOU
  - Greater involvement of the FWS/DFG in INRMP contents and approval

# Joint INRMP/HCP/CESA 2081

- Benefits
  - Take permit for all covered species under ESA and for listed species under CESA
  - “No surprises” assurances under the ESA, but unlikely under CESA
  - Slightly less expensive than HCP/NCCP
- Constraints:
  - Longer time to complete final documents due to ESA/CESA approval processes
  - More expensive than INRMP w/Plants MOU
  - Greater involvement of the FWS/DFG in INRMP contents and approval
  - Section 6 grant funding less likely available

# **INRMP followed by HCP/CESA 2081**

- **Benefits:**
  - County retains control of INRMP process without FWS/DFG control
  - INRMP completed on County's schedule (not FWS/DFG)
- **Constraints:**
  - Additional cost to achieve ESA/CESA compliance
  - Additional time to achieve ESA/CESA compliance
  - “No surprises” assurances under state law are unlikely without an NCCP
  - If INRMP is inconsistent with HCP process, there could be additional delays and costs
  - Section 6 grant funding less likely available



# Comparison of Alternatives

<u>Approach</u>	<u>Rough Cost</u> <sup>1</sup>	<u>INRMP</u> <sup>2</sup> <u>Duration</u>	<u>Total</u> <u>Duration</u>	<u>Permit</u> <u>Assurances</u>	<u>FWS/DFG</u> <u>Roles</u>
INRMP only	\$1.5M	3.0 yrs	3.0 yrs	None	Limited
INRMP & Plants MOU	\$1.6M	3.0 yrs	3.0 yrs	Plants	Moderate
Joint INRMP/HCP/NCCP	\$1.9M	4.25 yrs	4.25 yrs	Most	High
Joint INRMP/HCP/CESA	\$1.8M	4.25 yrs	4.25 yrs	Middle	High
INRMP then HCP/CESA	\$2.0M	3.0 yrs	5.0 yrs	Middle	Low - High

<sup>1</sup> Rough cost estimate is for SAIC costs only and does not include attorney or other costs – this is not a bid.

<sup>2</sup> Estimate of duration includes time to complete EIR/EIS and federal/state permitting.