

BRCP
Administrative Draft
Overview of Chapter 9. Alternatives to
Take

Presentation to:
BRCP Stakeholder Committee

March 7, 2012

▶ **Need for Alternatives to Take Analysis**

- ▶ Federal ESA requires that permit applicants specify what alternative actions to the taking of federally listed threatened and endangered species were considered and the reasons why those alternatives were rejected
- ▶ No similar requirement under the California NCCPA, so Chapter 9 is for federal ESA purposes only
- ▶ Applies only wildlife and fish (not plants)
- ▶ Not the same as the EIR/EIS Alternatives Analysis
- ▶ USFWS approach to developing and evaluating alternatives to take is evolving

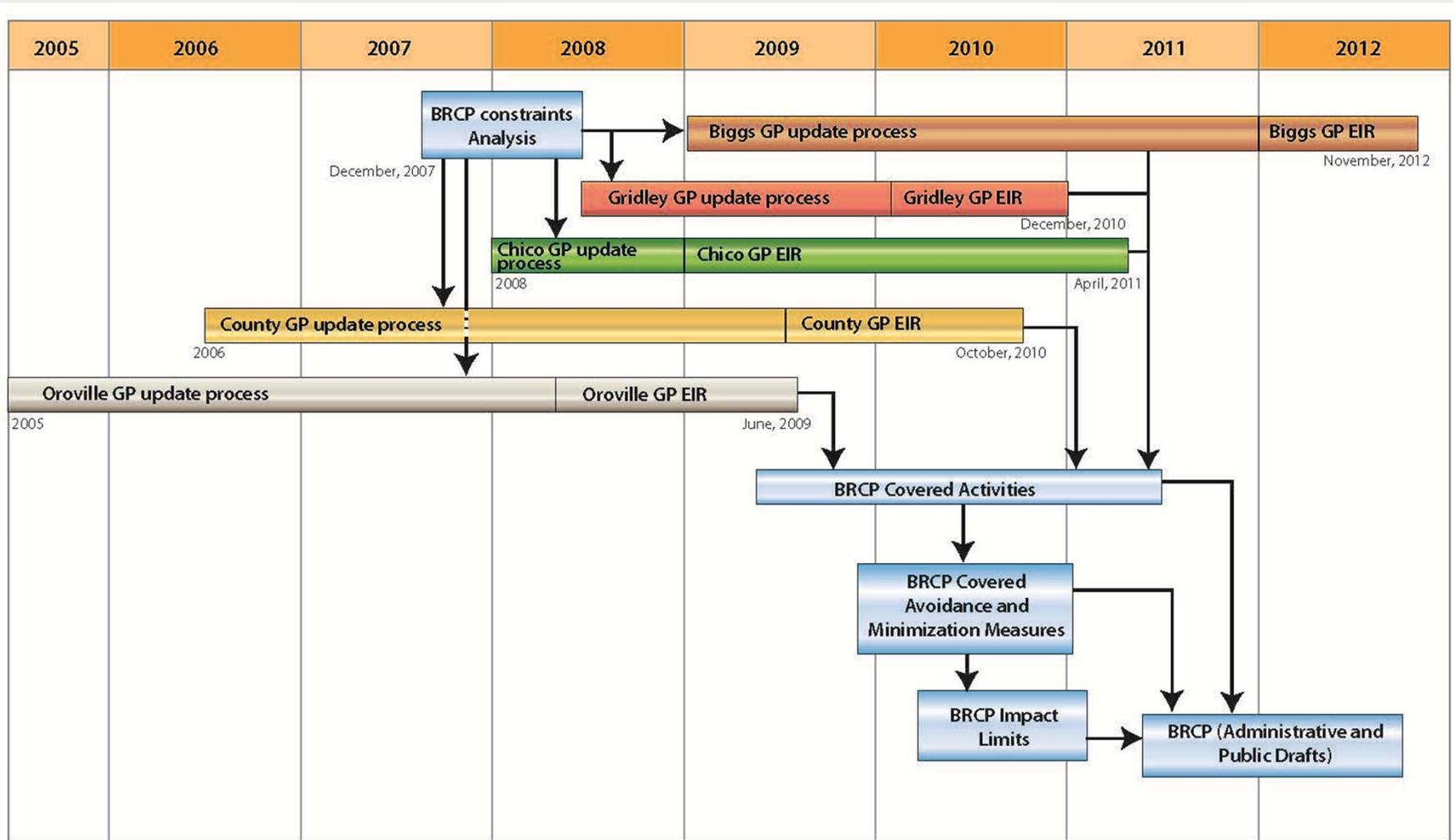
▶ Approach used in BRCP Alternatives to Take

- ▶ Assessment of alternatives to take is presented for two levels of ecological scale:
 - **Regional analysis (Plan Area)** – Alternatives evaluated in regional county/cities general plans and their EIRs and how take was further reduced through provisions of the BRCP
 - **Individual wildlife and fish species analysis** – Alternative approaches for minimizing and avoiding take for each species
- ▶ No Take Alternative considered
 - Would restrict BRCP covered activities to avoid all take of federally listed fish and wildlife species
 - Would obviate the need for issuance of incidental take permits by USFWS and NMFS
 - Rejected for not meeting local needs for growth and development and health and safety

► Reasons of Rejecting Regional Alternatives

- Reasons for rejecting alternatives that would have lesser impacts on species than other alternatives:
 - The alternative is not consistent with the overall goals and objectives of the County and city general plans, planned infrastructure improvements, and the BRCP
 - The alternative is not practicable in light of cost, logistics and technology
- Alternatives with greater impacts on species than the general plan preferred alternative could be rejected for that reason

► General Plans and BRCP Coordination



▶ **Biological Constraints Analysis (December 2007)**

- ▶ Developed by BRCP to assist land use planning
- ▶ Identified the most sensitive biological resources in the Plan Area
- ▶ Used by County and city planners in developing general plans
- ▶ Help general plans avoid and minimize take of covered species

▶ **Assessment of General Plan Alternatives**

- ▶ General Plan EIR alternatives for County, Chico, Oroville, Gridley, and Biggs
- ▶ Assessed development footprint of general plan alternatives from EIRs on habitat for wildlife and fish species
- ▶ Typically: No Project Alternative (existing GP), Preferred Alternative (adopted GP), two or three other Alternatives (e.g., higher and lower density land use designs)

▶ **Additional Measures in BRCP to Reduce Take**

- ▶ More strict limits set on take of habitat for wildlife and fish (wetlands and riparian habitats) than footprint of preferred alternatives
- ▶ Species-specific survey requirements and measures to avoid and minimize impacts (avoiding species occurrences)

► Evaluation of Alternatives for Individual Species

- ▶ Identified and evaluated alternative approaches to covered activities that would avoid or minimize take for each covered wildlife and fish species
- ▶ Alternative approaches were assessed based on the following criteria:
 - Level of incidental take expected to result and conservation benefits to the species;
 - Consistency with the overall goals and objectives of the County and city general plans, planned infrastructure improvements, and the BRCP; and
 - Practicability in light of cost, logistics and technology.
- ▶ Reasons provided for why alternative approaches were not adopted in the BRCP Conservation Strategy

▶ Next Steps

- ▶ Review of Chapter 9 by Stakeholder Committee
- ▶ Review of Chapter 9 by USFWS and NMFS
- ▶ Input from USFWS and NMFS on approach to Alternatives to Take used in BRCP
- ▶ Revise Chapter 9 as needed for 2nd Administrative Draft BRCP

Questions & Discussion