

# CALIFORNIA ENDANGERED SPECIES ACT PERMITTING

**Ryan Mathis, Senior Environmental Scientist (Supervisor)  
California Department of Fish and Wildlife**

**CALTRANS ROAD ECOLOGY MEETING  
October 21, 2015**

| MONTH | DAY | YEAR | AM | HOUR | MIN |
|-------|-----|------|----|------|-----|
| OCT   | 21  | 2015 | PM | 04   | :29 |

DESTINATION TIME

The background of the slide is teal. On the left side, there are two white silhouettes of eagles in flight. One eagle is positioned higher and further to the left, while the other is lower and further to the right, appearing to be in a different phase of flight or landing. The silhouettes are detailed, showing the feathers and talons.

# RYAN'S CAVEATS

- My talk is intended to provide an overview of statutes and regulations that pertain to CESA permitting.
- My talk does not provide a definite overview of the subject and should not be treated as the **final word** of CDFW.
- Information, examples, or recommendations discussed should not be treated as CDFW guidelines, instructions, standards, permit requirements, etc.
- How the statutes and regulations are interpreted and applied to a particular project will vary on a project-by-project and species-by-species basis.

A teal vertical bar on the left side of the slide features a white silhouette of an eagle in flight, with its wings spread wide and talons extended.

# TOPICS I WILL COVER

- Brief overview of CESA
- Consistency Determinations
- Incidental Take Permits
- Open discussion to address 2080.1 and 2081 questions

# **BRIEF HISTORY OF CESA**





# History of California's Legislative and Regulatory Actions to Protect Wildlife

1909 Non-game birds protected

1957 Fully protected birds and mammals introduced into Fish and Game Code

1970 California Endangered Species Act (CESA) enacted to protect rare and endangered species

1977 Native Plant Protection Act (NPPA) enacted

1983 California Environmental Quality Act (CEQA) amended to define and protect rare and endangered species

2009 Safe Harbor Agreements introduced to Fish and Game Code



Western meadowlark (*Sturnella neglecta*). Photo by Cathie Vouchilas, CDFW



Southern sea otter (*Enhydra lutris nereis*), fully protected. Photo by Dave Feliz, CDFW



Giant garter snake (*Thamnophis gigas*), threatened. Photo by Margaret Mantor, CDFW



Sonoma sunshine (*Blennosperma bakeri*), endangered. Photo by Jeb Bjerke, CDFW



Winter-run Chinook salmon (*Oncorhynchus tshawytscha*), endangered. Photo by Cathie Vouchilas, CDFW



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1909 ▶ 2009

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Conserving California's Natural Resources *yesterday, today, and tomorrow.*



# **CONSISTENCY DETERMINATIONS**





# STATUTORY AUTHORITY

- Assembly Bill 21 (Olberg) 1997
- Fish & G. Code, § 2080.1

## **2080.1. Taking Endangered Species with Federal Incidental Take Statement**

(a) Notwithstanding any other provision of this chapter, or Chapter 10 (commencing with Section 1900) or Chapter 11 (commencing with Section 1925) of Division 2, but subject to subdivision (c), if any person obtains from the Secretary of the Interior or the Secretary of Commerce an **incidental take statement** pursuant to Section 1536 of Title 16 of the United States Code or an **incidental take permit** pursuant to Section 1539 of Title 16 of the United States Code that authorizes the taking of an endangered species or a threatened species that is listed pursuant to Section 1533 of Title 16 of the United States Code and that is an endangered species, threatened species, or a candidate species pursuant to this chapter, **no further authorization or approval is necessary under this chapter** for that person to take that endangered species, threatened species, or candidate species identified in, and in accordance with, the incidental take statement or incidental take permit, if that person does both of the following:



Project may “take” dually listed species?



Caltrans sends letter requesting Consistency Determination (CD) and BiOp to Director



Director’s office date stamps request & 30-day time clock begins



CDFW determines if BiOp is consistent with CESA



CDFW prepares CD and Cover Letter



CDFW notifies Caltrans, mails originals, publishes CD in Cal. Reg. Notice Register



# DUALLY LISTED SPECIES

|                 |                     |                      |
|-----------------|---------------------|----------------------|
| Shasta crayfish | CA tiger salamander | Giant garter snake   |
| Coho            | Yellow-legged frog  | Northern spotted owl |
| Chinook         | Desert tortoise     | San Joaquin kit fox  |





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# WHAT CAN CALTRANS SUBMIT?

|  |                                      |
|--|--------------------------------------|
| Section 7  | Section 10(a)(1)(B)                  |
| Letter requesting consistency sent to Director Bonham    |                                      |
| Federal Incidental Take Statement (ITS)                  | Federal Incidental Take Permit (ITP) |
| Biological Opinion                                       | Habitat Conservation Plan            |
| Additional items that are helpful                        |                                      |
| Biological Assessments                                   | Implementing agreements              |
| NEPA Documents   | Monitoring Reports                   |
| Mitigation (bank receipts, conservation easements, etc.) | Form of Financial Security           |



# SECTION 7 VS SECTION 10

|              | Section 7 ITS and BO  | Section 10 (a)(1)(B) ITP and HCP   |
|--------------|---|--|
| Parties      | Federal Agency x Federal Agency   | Federal Agency x Non-Federal   |
| Examples     | USFWS x ACOE; NMFS x ACOE;<br>Caltrans as FHA agent x NMFS                                      | USFWS x PGE; USFWS x timber<br>co.   |
| Trigger      | Federal Nexus (project funded,<br>authorized or carried out by a<br>federal agency)             | No Federal Nexus; Section 7 does<br>not apply – ACOE may not take<br>jurisdiction of upland areas.     |
| Requirements | Minimize the level of take; shall<br>reinitiate consultation if project<br>changes; no jeopardy | Ensure adequate funding;<br>minimize and mitigate to the<br>maximum extent practicable; no<br>jeopardy |



# CONSISTENCY WITH CESA

## CESA § 2081(b)

|   |
|---|
| Take is incidental to an otherwise lawful activity                                |
| Candidate, threatened, and endangered   |
| Plants are protected  |
| Habitat - proxy   |
| Take shall be <b>minimized and fully mitigated</b>                                |
| Shall ensure <b>adequate funding</b> to implement the minimization and mitigation |
| Take must not jeopardize the continued existence of the species                   |

## Endangered Species Act § 7

|   |
|---|
| Take is incidental to an otherwise lawful activity              |
| Threatened and endangered                                       |
| Plants not included in ITS or ITP                               |
| Habitat protected Harm  |
| Minimize the level of take                                      |
| Shall reinitiate consultation if project changes                |
| Take must not jeopardize the continued existence of the species |



# CDFW PROCESS AND REVIEW

|   |   |
|---|---|
| Was the request received by the Director's Office?                        | Do the BO list CDFW as a recipient of reports?  |
| Does the request include a BO/ITS or HCP/ITP?                             | Does the BO contain measures or recommendations to fully mitigate?  |
| Did Caltrans coordinate with FWS or NMFS and CDFW prior to BO issuance?   | Does the BO require permanent protection and perpetual management of mitigation lands (CE and Endowment)? |
| Does the BO identify who is responsible for compliance (FHA or Caltrans)? | Does the BO require purchasing credits at a bank?   |
| Does the BO identify who will monitor compliance (DB or Caltrans)?        | Does the BO require a security or bank credit purchase prior to covered activities?                       |
| Does the BO include CDFW as an approver for a DB.                         | Does the BO specify security amount or number of credits?   |
| Does the BO include monitoring, notification, and reporting?              | Is the form of security specified and is it acceptable to CDFW?   |

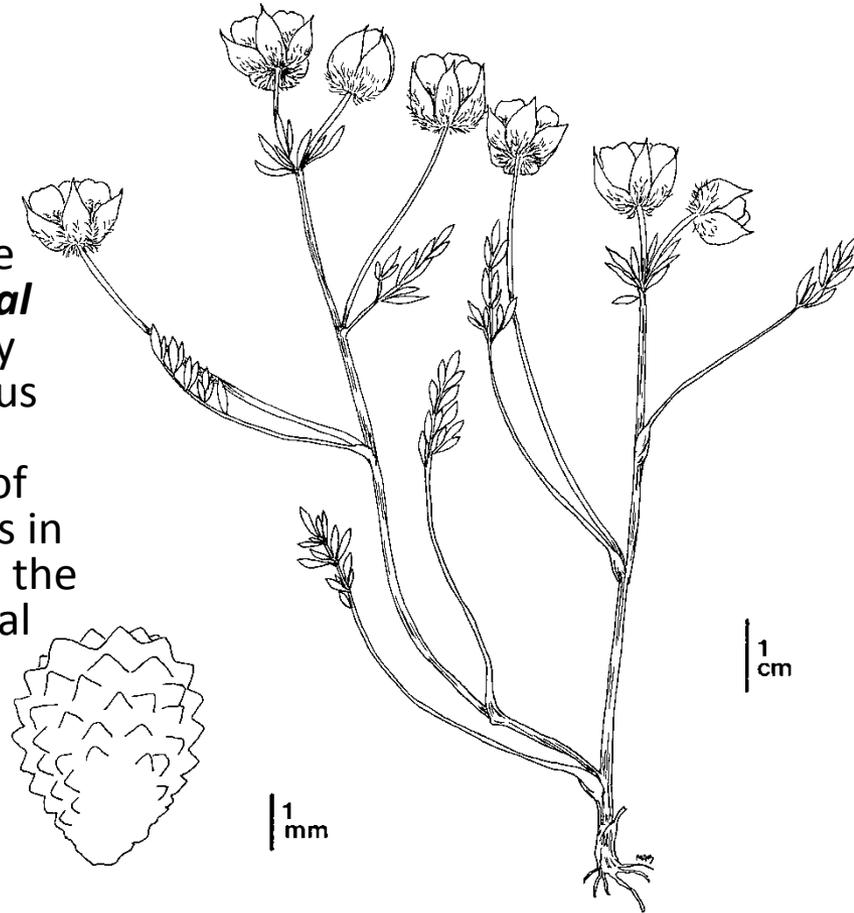


# WHAT ABOUT PLANTS?

- “Sections 7(b)(4) and 7(o)(2) of the Act **generally do not apply to listed plant species**. However, limited protection of listed plants from take is provided to the extent that the Act prohibits the **removal** and **reduction** to possession of Federally listed **endangered** plants or the malicious damage of such plants on areas under Federal jurisdiction, or the destruction of endangered plants on non-Federal areas in violation of State law or regulation or in the course of any violation of a State criminal trespass law.”

Source: *Endangered Species Act Consultation Handbook*

- Please refer to 16 U.S.C. § 1538 (a)(2)



Butte County meadowfoam (*Limnanthes floccosa* ssp. *californica*)  
CDFW illustration by Mary Ann Showers



# WHAT ABOUT PROGRAMMATIC BIOPs?

- The ***full mitigation and adequate funding*** standards, generally leads CDFW to find programmatic BiOps inconsistent with CESA
- Append letters issued by the Services
- Amendment of 50 C.F.R. §§ 402.02 & 402.14
- ***Framework programmatic action*** – no ITS issued upfront – action specific ITS
- ***Mixed programmatic action*** – might be business as usual



## FEDERAL REGISTER

Vol. 80                      Monday,  
No. 90                      May 11, 2015

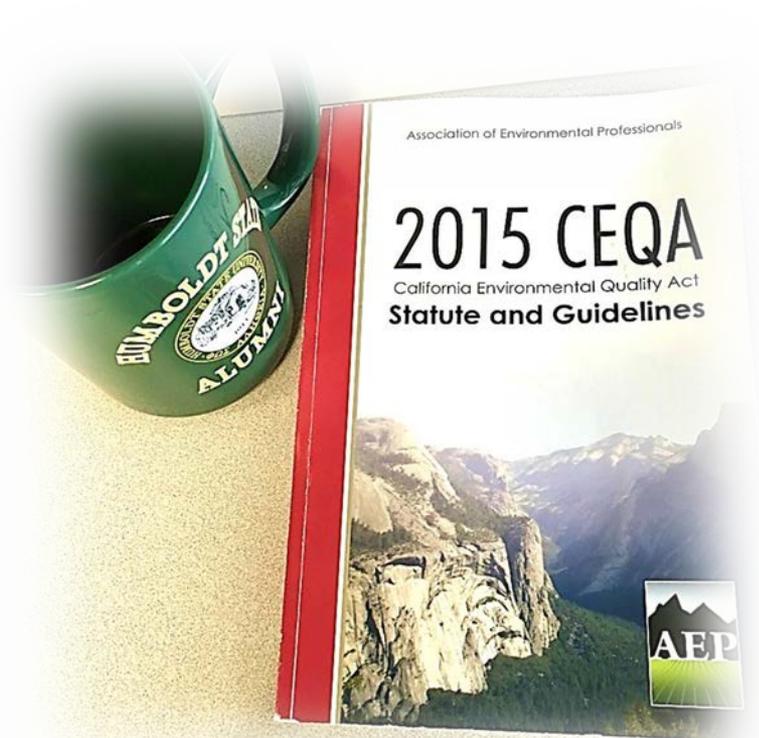
Pages 26817–27068

OFFICE OF THE FEDERAL REGISTER



# What about CEQA?

- Request for consistency is a simple yes/no question
- Determination is a simple yes/no answer
- 30-day timeline
- ***Ministerial***





# IMPORTANT POINTS TO REMEMBER

- Early coordination with feds and CDFW
- Request must be sent to the Director's office in Sacramento
- No ITS or ITP | **No CD**
- CDFW has **30 days** to complete
- All or none **1 Project/1 Permit**
- **No plants!**
- **Must meet same issuance criteria as 2081 (b)**



# Deputy Director Signs the CD and Cover Letter

Habitat Conservation Planning Branch  
transmits the CD to Caltrans



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EDMUND G. BROWN, JR., GOVERNOR

OFFICE OF ADMINISTRATIVE LAW

# California Regulatory Notice Register

REGISTER 2015, NO. 28-Z

PUBLISHED WEEKLY BY THE OFFICE OF ADMINISTRATIVE LAW

JULY 10, 2015

## GENERAL PUBLIC INTEREST

### CALIFORNIA GAMBLING CONTROL COMMISSION

*Program for Responsible Gambling* ..... 1166

### DEPARTMENT OF FISH AND WILDLIFE

*Caltrans Cedar Creek Arch Culvert Consistency Determination (CD) No. 2080-2015-013-01* ..... 1166

### DEPARTMENT OF TRANSPORTATION

*Notice of Revised Standardized Regulatory Impact Assessment and Modifications to Text of Proposed Regulations Concerning the Affordable Sales Program* ..... 1169

## PROPOSITION 65

### OFFICE OF ENVIRONMENTAL HEALTH HAZARD ASSESSMENT

*Notice of Intent to List: 1-Bromopropane* ..... 1171

## SUMMARY OF REGULATORY ACTIONS

Regulations filed with the Secretary of State ..... 1173

Sections Filed, January 28, 2015 to July 1, 2015 ..... 1176



# **INCIDENTAL TAKE PERMITS**



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# Statutory Authority

## **2081. Exceptions To Section 2080**

The department may authorize acts that are otherwise prohibited pursuant to Section 2080, as follows:

(a) Through permits or memorandums of understanding, the department may authorize individuals, public agencies, universities, zoological gardens, and scientific or educational institutions, to import, export, take, or possess any endangered species, threatened species, or candidate species for scientific, educational, or management purposes.

(b) The department may authorize, by permit, the take of endangered species, threatened species, and candidate species if all of the following conditions are met:

(1) The take is incidental to an otherwise lawful activity.

(2) The impacts of the authorized take shall be minimized and fully mitigated. The measures required to meet this obligation shall be roughly proportional in extent to the impact of the authorized taking on the species. Where various measures are available to meet this obligation, the measures required shall maintain the applicant's objectives to the greatest extent possible. All required measures shall be capable of successful implementation. For purposes of this section only, impacts of taking include all impacts on the species that result from any act that would cause the proposed taking.

(3) The permit is consistent with any regulations adopted pursuant to Sections 2112 and 2114.

(4) The applicant shall ensure adequate funding to implement the measures required by paragraph (2), and for monitoring compliance with, and effectiveness of, those measures.

(c) No permit may be issued pursuant to subdivision (b) if issuance of the permit would jeopardize the continued existence of the species. The department shall make this determination based on the best scientific and other information that is reasonably available, and shall include consideration of the species' capability to survive and reproduce, and any adverse impacts of the taking on those abilities in light of (1) known population trends; (2) known threats to the species; and (3) reasonably foreseeable impacts on the species from other related projects and activities.

(d) The department shall adopt regulations to aid in the implementation of subdivision (b) and the requirements of Division 13 (commencing with Section 21000) of the Public Resources Code, with respect to authorization of take. The department may seek certification pursuant to Section 21080.5 of the Public Resources Code to implement subdivision (b).

(AM '97)



# Regulatory Authority

STATE OF CALIFORNIA  
FISH AND GAME COMMISSION

**CALIFORNIA CODE OF REGULATIONS  
OCTOBER 2013**

**TITLE 14. NATURAL RESOURCES**

**DIVISION 1. FISH AND GAME COMMISSION —  
DEPARTMENT OF FISH AND WILDLIFE**



**JERRY BROWN, Governor**

**FISH AND GAME COMMISSION**

**MICHAEL SUTTON  
PRESIDENT  
Monterey**

**RICHARD ROGERS  
VICE PRESIDENT  
Santa Barbara**

**JIM KELLOGG  
COMMISSIONER  
Discovery Bay**

**JACQUE HOSTLER-CARMESIN  
COMMISSIONER  
McKinleyville**

**JACK BAYLIS  
COMMISSIONER  
Los Angeles**

**Executive Director  
SONKE MASTRUP**

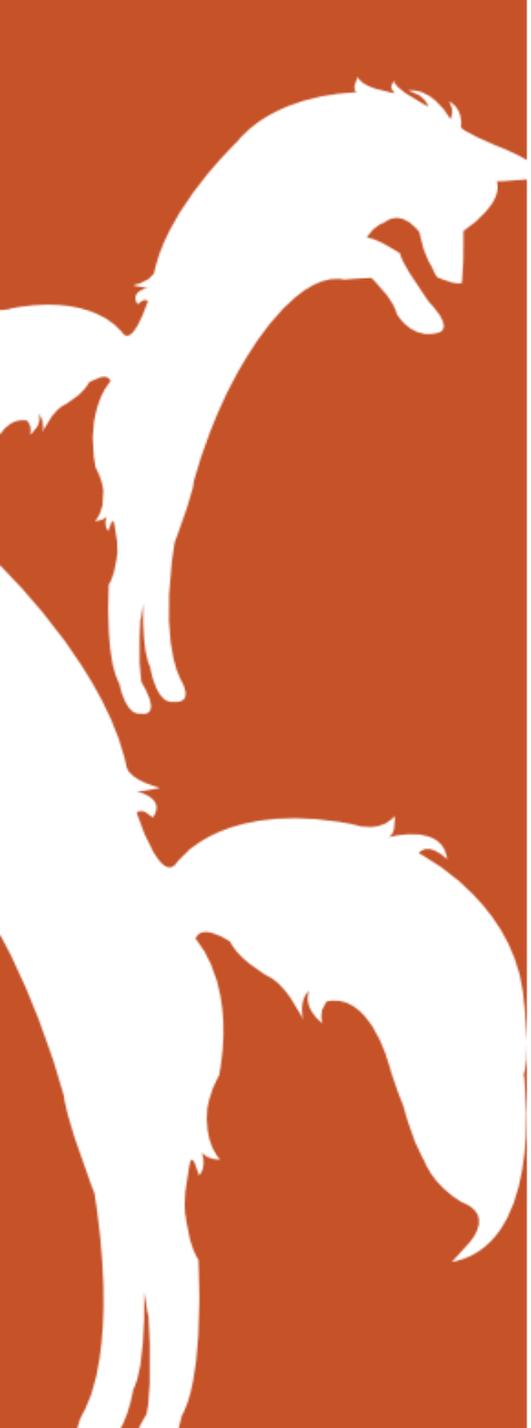
**Chapter 6.**

**Regulations for Implementation  
of the California Endangered  
Species Act ..... 198.3**

**Article 1.**

**Take Prohibition; Permits  
for Incidental Take of  
Endangered Species,  
Threatened Species and  
Candidate Species ..... 198.3**

- § 783.0. Purpose and Scope of Regulations.
- § 783.1. Prohibitions.
- § 783.2. Incidental Take Permit Applications.
- § 783.3. Compliance with the California Environmental Quality Act.
- § 783.4. Incidental Take Permit Review Standards.
- § 783.5. Incidental Take Permit Process.
- § 783.6. General Permit Conditions.
- § 783.7. Permit Suspension and Revocation.
- § 783.8. Reconsideration and Appeal Procedures.



Project may “take” candidate, threatened, or endangered species?



Caltrans sends ITP application to Regional Manager



Within 30 days CDFW determines if application is complete



If the CEQA process is complete – 90 days to finalize ITP



CDFW finalizes ITP | Caltrans signs | project may commence\*



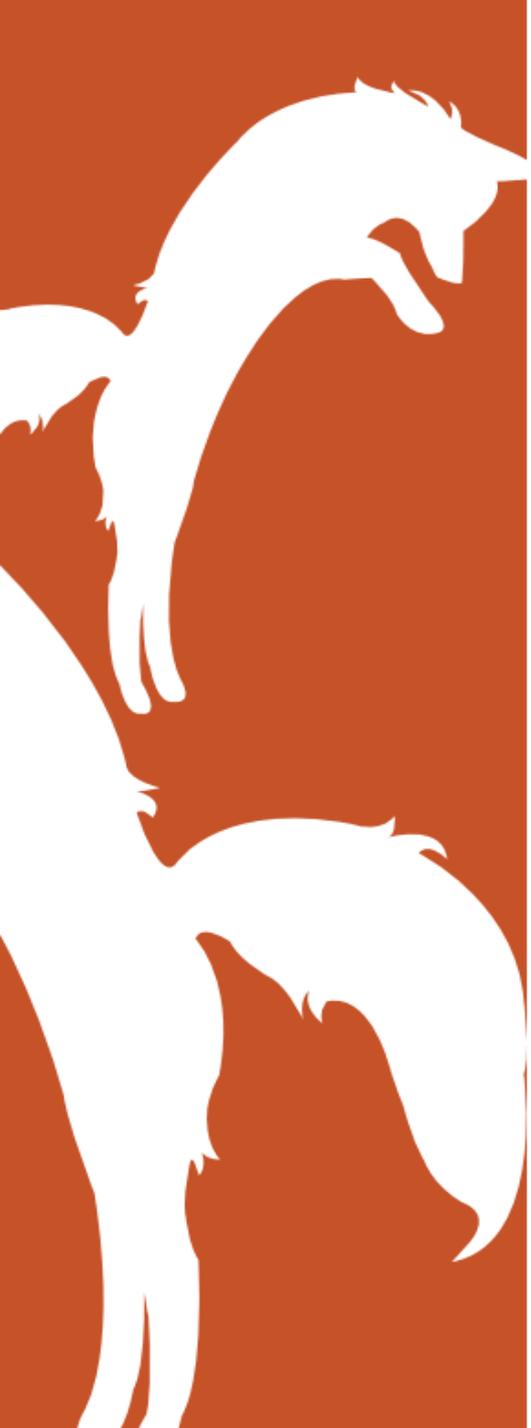
Mitigation monitoring and reporting,



# CESA LISTED SPECIES

|                  |                          |                       |
|------------------|--------------------------|-----------------------|
| Clear Lake Hitch | Bank swallow             | Trinity bristle snail |
| Longfin smelt    | Townsend's big-eared bat | Swainson's Hawk       |
| Great gray owl   | Shasta salamander        | Scott Bar Salamander  |





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# THE ITP APPLICATION REQUIREMENTS

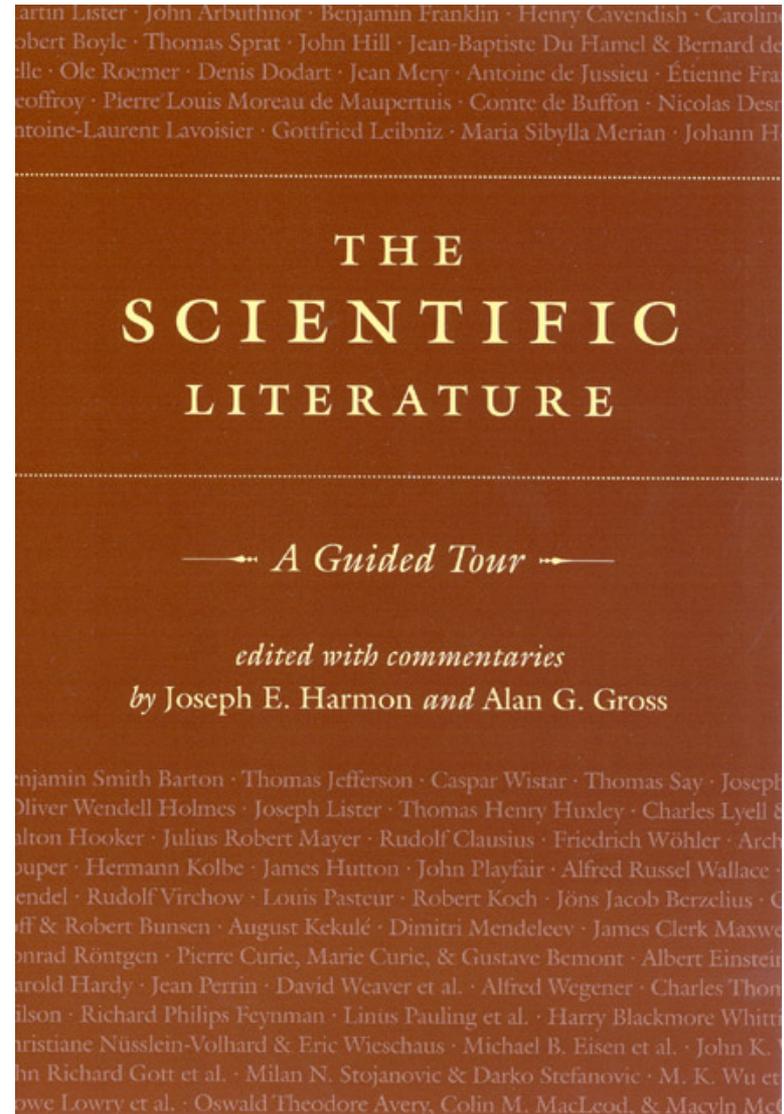
## *TITLE 14 SECTION 783.2(a)*

1. Applicants Contact Information
2. Species To Be Covered
3. Project Description
4. Project Location
5. Extent Of Take
6. Impact On The Species
7. Jeopardy Analysis
8. Minimization/Mitigation Measures
9. Compliance Monitoring
10. Funding Assurance
11. Certification Language



# Resources for ITP Applications

- CDFW Liaisons
- Coworkers
- Previous Permits Issued
- Species Experts
- Scientific Literature







# APPLICATION REQUIREMENTS

1. Applicants Contact Information
2. Species To Be Covered
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# ITP SECTIONS

1. Covered species
2. Location/Description
3. Impacts of the taking
  - a) What activities will cause take (Covered Activities)
  - b) The area where take may occur (Project Area)
  - c) Temp + Perm impacts to habitat
4. Take Minimization Measures:[Species specific conditions]
5. Monitoring, Notification and Reporting Provisions



# CDFW'S APPLICATION RESPONSE LETTER

- Application Complete Letter
  - Provides Timeline & Contact Information
  - Past Practice
    - Include Request For Additional Information
    - *“CDFW cannot finalize the Permit until we receive your certified/adopted CEQA document, NOD, CEQA filing fee receipt.”*
- Application Incomplete Letter
  - Details Deficiencies With Citations
  - Offers Further Consultation



# ITP APPLICATION SUMMARY

- CDFW uses the criteria at Title 14, §§ 783.2 (a) (1)- (11) and 783.3 (a) (1) -(3)
- CDFW has 30 days, otherwise the application is deemed complete
- ITP is due in 90 days, or 90 days after CEQA complete, or 150 days if extension is needed.



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# FINALIZING THE ITP

- Project Location:
- **Project Description:**
- Covered Species Subject to Take Authorization Provided by this ITP:
- **Impacts of the Taking on Covered Species**
- Incidental Take Authorization of Covered Species
- Conditions of Approval
- Legal Compliance:
- CEQA Compliance:
- LSA Agreement Compliance
- ESA Compliance:
- ITP Time Frame Compliance:
- **Monitoring, Notification and Reporting Provisions:**
- **Take Minimization Measures:[Species specific conditions].**
- **Habitat Management Land Acquisition [and Restoration]:**
- **Performance Security**
- Amendment
- Stop-Work Order
- Compliance with Other Laws
- Notices: Written notices, reports and other communications relating to this ITP
- Compliance with CEQA
- Findings Pursuant to CESA
- Attachments



# PROJECT DESCRIPTION

- Concise overview of the project that identifies all aspects of the project. What, where, when, & why.
- Periods of construction and operation, estimated commencement and completion dates, and anything specific to the project that is relevant.
- ITP will identify all specific activities that may affect the Covered Species (e.g., pile driving or work within a wetted channel), habitat conditions on the project site, and anything specific to the project that is relevant to the ITP.
- This important section of the ITP is the basis for conclusions regarding impacts detailed in the ***Impacts to Covered Species*** section.



## IMPACTS OF THE TAKING ON COVERED SPECIES

- ITP will list the expected type, mechanism, and locations where take is anticipated: kill, pursue, catch, capture or attempt to do so.
- Impacts of the taking: Loss of habitat, potential for additional decline of the species, fragmentation, invasive species/predators, loss of genetic diversity, and any other indirect or cumulative effects.
- What activities will cause take (**Covered Activities**)
- The area where take may occur (**Project Area**) may differ from Project footprint.
- **Temp + Perm** impacts to habitat



## TAKE MINIMIZATION MEASURES:

### PROJECT MODIFICATIONS TO MINIMIZE IMPACTS

- Species-specific and life stage specific
- Can project footprint, timing, methods be changed to reduce the impact?
- Construction fences, sound walls, moving or avoiding Covered Species
- Worker Education
- Speed Limits, trash, erosion BMPs, hazardous materials control
- Clearly written and enforceable



# TAKE MINIMIZATION MEASURES

- Must be enforceable
- Not less stringent than CEQA doc
- Wording should not be able to be interpreted more than one way
- Measures specific to each Covered Species
- Measures specific to each kind of covered activity (e.g., construction, O&M, restoration, etc.)



# TAKE MINIMIZATION MEASURES

- Must be implementable and reasonable
- Must tie to avoidance or minimization of take of the Covered Species (must demonstrate that avoiding and minimizing direct take)
- HCPB currently drafting species specific measures based on best available science\*



# FULLY MITIGATING

- Determined on a case-by-case basis
- For temporary impacts: on-site restoration may be sufficient to fully mitigate
- For bigger impacts: permanent protection and perpetual management of habitat
- Purchase of credits from DFG-approved banks
- Conservation Easement, Endowment



# FULLY MITIGATING TEMPORARY IMPACTS

- “Temporary” impacts should be no more than 2-5 years in duration (before return to baseline), usually less than two
- Have to consider Covered Species (e.g. CTS vs SJKF); low mitigation ratios for temporary impacts may not make sense biologically; consult with species experts as needed, especially if novel approach or species
- If you do the above, need clear parameters for defining when something not temporary (e.g. permanent)
- Habitat temporarily impacted should be capable of meeting successful quantifiable criteria (e.g. not the desert)
- Typically in the form of on-site restoration



# FULLY MITIGATING PERMANENT IMPACTS

- How much compensatory mitigation land (HM land) is needed
  - project-by-project basis, impact to impact basis
- Generally three methods to satisfy mitigation obligation before beginning Covered Activities:
  - Purchase mitigation bank credits
  - Permanent protection of Habitat Management (HM) land
  - Provide performance security



# IN THE ABSENCE OF PROVIDING PERFORMANCE SECURITY CONSERVATION BANK CREDIT PURCHASE

- Purchase of Covered Species credits at a State approved mitigation bank
  - Review service area for the Covered Species for the mitigation bank
  - Determine if bank is appropriate biologically to mitigate the project impacts
  - Provide written approval for purchase of credits
  - Permittee submits proof of credit purchase before beginning covered activities or



# IN THE ABSENCE OF PROVIDING PERFORMANCE SECURITY OR PURCHASE OF CREDITS FROM A CB

- Purchase, permanently conserve, and provide for sufficient funding to manage the HM land in perpetuity for the Covered Species
  - HM land approved by CDFW and purchased/secured
  - HM land holder, CE holder, and endowment holder approved by CDFW
  - Habitat Management Plan approved by CDFW



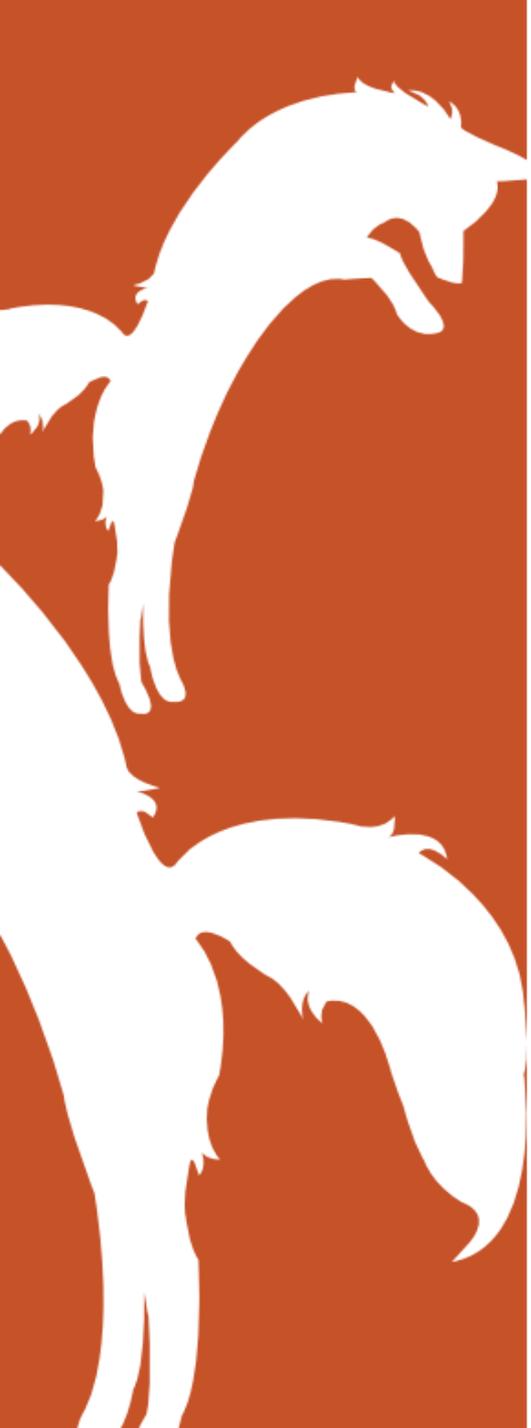
# IN THE ABSENCE OF PROVIDING PERFORMANCE SECURITY OR PURCHASE OF CREDITS FROM A CB

- Restoration and enhancement started (if appropriate) and performance criteria approved
- Property Analysis Record (PAR) or similar analysis approved by CDFW, funds deposited
- Form of conservation easement (CE) approved by CDFW or ***transfer of jurisdiction***\*
- CE recorded and/or fee title transferred



# PERFORMANCE SECURITY

- What is it and what does it do?
- How is it calculated and by whom?
  - HM replacement land purchase (# of acres of HM Lands x [cost per acre + RE fees + escrow fees])
  - Interim management
  - Start-up and enhancement
  - Long-term management
  - Account setup fees
  - Restoration costs
- Set up Security prior to start of Covered Activities
  - Letter of Credit (LOC), Escrow Account, Cash Deposit, Surety Bond; etc.



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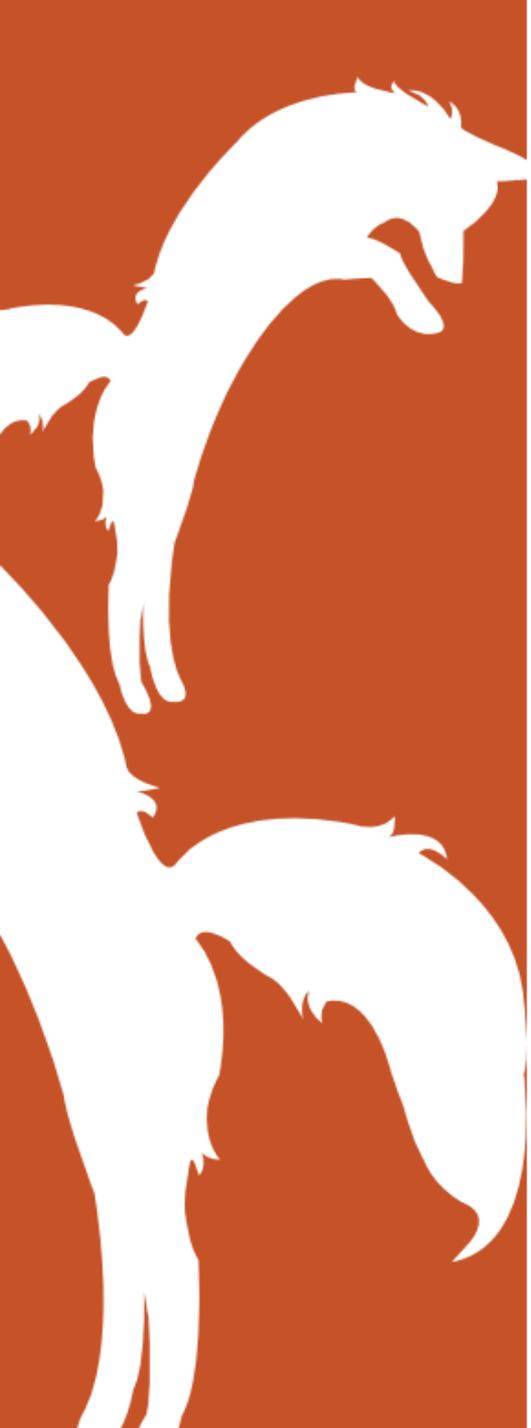
# Issuing the Permit

- Allow time for ITP review at HQ and OGC levels if needed (e.g., Ferguson Slide)
- Mitigation Monitoring and Reporting Plan, other documents in the package
- RM signs the documents, off to Permittee
- Caltrans signs ITP is in full effect



# Pre-project ITP Deliverables

- Notification of Designated Representative
- Submission of names and qualifications of proposed Designated Biologist(s)
- Submission of preconstruction notification
- Covered Species Mortality Reduction and Relocation Plans
- Preconstruction biological survey reports



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Mitigation monitoring and reporting



# MONTHLY/QUARTERLY REPORTS

- Please be sure they are submitted on time
- Self-reporting of compliance with the Conditions of Approval in the ITP
  - MMRP table with notes
  - Number of acres disturbed since the last report and cumulatively
  - Summary and results of all pre-activity surveys
  - Covered Species identifications, relocations, or injuries
  - Any other information about Project related impacts on the Covered Species



# ITP AMENDMENTS

When Are ITP Amendments needed?

- When something different than what in the ITP (project description, figures, timing, etc.) needs to happen, unless there is built in flexibility with that particular measure
- Can be CDFW or Applicant initiated
- We may not agree with all Applicant proposed Amendments...what they request might not be feasible or might need modification.
- Minor vs Major Amendments



# ITP AMENDMENTS

- **Minor** permit amendments are those that would not significantly modify the scope or nature of the permitted project or activity or the minimization, mitigation or monitoring measures
- **Major** permit amendments are those that would significantly modify the scope or nature of the permitted project or activity or the minimization, mitigation or monitoring measures in an incidental take permit, or require additional environmental review pursuant to CEQA.



Project may “take” dually listed species?



Caltrans sends letter requesting Consistency Determination (CD) and BiOp to Director



Director’s office date stamps request & 30-day time clock begins



CDFW determines if BiOp is consistent with CESA



CDFW prepares CD and Cover Letter



CDFW notifies Caltrans, mails originals, publishes CD in Cal. Reg. Notice Register



Project may “take” candidate, threatened, or endangered species?



Caltrans sends ITP application to Regional Manager



Within 30 days CDFW determines if application is complete



If the CEQA process is complete – 90 days to finalize ITP



CDFW finalizes ITP | Caltrans signs | project may commence\*



Mitigation monitoring and reporting,



# FIND THE PERMIT BEST SUITED FOR YOUR PROJECT

## ***Consistency Determination***

- State and federally listed
- Federal authorization required
- Strict 30 day timeline (if consistent with CESA)
- No CEQA
- CDFW has a yes or no decision on consistency with CESA: CDFW cannot change or add anything to make it consistent.

## ***Incidental Take Permit***

- CESA-listed species
- Federal authorization not required
- Longer timeframe (30 days + 90 days + 60 days)
- CEQA required
- Permit written to be follow OGC approved template

**BOTH METHODS MUST COMPLY WITH THE CESA PERMIT ISSUANCE CRITERIA!**

# Thank you





**Questions?**



# CONTACT INFORMATION

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