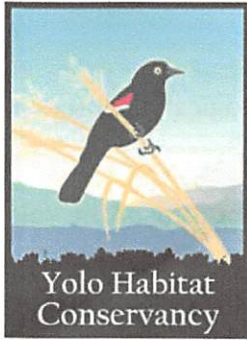


Appendix A  
**Letter to CDFW**

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# Yolo Habitat Conservancy

*County of Yolo • City of Davis • City of Winters • City of West Sacramento  
City of Woodland • University of California, Davis*

February 12, 2018

Charlton H. Bonham, Director  
California Department of Fish and Wildlife  
1416 Ninth Street  
Sacramento, CA 95814

**Subject: Draft of Yolo Regional Conservation Investment Strategy/Local Conservation Plan**

Dear Mr. Bonham:

In accordance with California Fish and Game Code Section 1852(c)(2), the Yolo Habitat Conservancy requests the California Department of Fish and Wildlife (CDFW) review the Yolo Regional Conservation Investment Strategy (RCIS) for completeness. The 653,549-acre RCIS strategy area comprises all of Yolo County. This area is of statewide importance for conservation, as it supports numerous rare and endangered fish, wildlife, and plant species. This RCIS updates the existing Yolo Local Conservation Plan (LCP) developed by the Yolo Habitat Conservancy from 2014-2016. We are not requesting that CDFW review the portions of the joint RCIS/LCP that are LCP only, but we welcome comments if provided.

The Yolo Habitat Conservation Plan/Natural Community Conservation Plan (Yolo HCP/NCCP), which the Conservancy expects to complete in June 2018, coincides exactly with the strategy area for the Yolo RCIS/LCP. The Yolo HCP/NCCP does not cover all species or natural communities in Yolo County, so the Yolo Habitat Conservancy developed the LCP to encourage additional voluntary, non-regulatory conservation. The Yolo Habitat Conservancy agreed to add the RCIS component to the LCP because it was consistent with existing efforts to develop a countywide conservation plan to complement the Yolo HCP/NCCP. The Yolo RCIS/LCP Steering Committee, consisting of the Yolo Habitat Conservancy, California Department of Water Resources, California Natural Resources Agency, Yolo County, American Rivers, and the Environmental Defense Fund, collaboratively updated the LCP into an RCIS/LCP. By using a science-based approach to identify conservation goals, objectives, and conservation actions for the region, the RCIS/LCP will aid the development of public infrastructure projects and implementation of local conservation goals by helping agencies identify priority conservation actions for compensatory mitigation, including as part of advance mitigation programs. Taken together, we believe the Yolo

HCP/NCCP and Yolo RCIS/LCP provide a comprehensive approach to conserve the biological resources in Yolo County.

On January 22, 2018, the Yolo Habitat Conservancy's Board of Directors authorized submittal of the Yolo RCIS/LCP to CDFW for review and subsequent release for public review and comment. (On January 23, 2018, the Yolo County Board of Supervisors also authorized submittal of the Yolo RCIS/LCP to CDFW.) In the same action, the Board of Directors approved provisionally identifying the Yolo Habitat Conservancy as the RCIS/LCP implementing sponsor. The Yolo Habitat Conservancy has several outstanding concerns regarding this role, but is willing to submit the draft RCIS/LCP to CDFW with the understanding these issues will be addressed to Yolo Habitat Conservancy's satisfaction prior to approval and submittal of the final Yolo RCIS/LCP. The remaining outstanding items are:

- Implementing sponsor. The Steering Committee has not formally identified an implementation sponsor. The Steering Committee has requested that the Yolo Habitat Conservancy provisionally accept the role of the Yolo RCIS/LCP implementing sponsor. The Yolo Habitat Conservancy does not wish to commit to serving in this capacity unless there is funding for implementation and agreement on the implementation responsibilities. The Yolo Habitat Conservancy will therefore wait to formally accept this role until the final Yolo RCIS/LCP and until funding for implementation is identified. Yolo Habitat Conservancy staff have suggested that MCA sponsors in the strategy area pay a fee to fund this work, a proposal that the Steering Committee is considering.
- Implementation costs. Yolo Habitat Conservancy staff believe that even a rough high and low cost estimate is important to include in the RCIS/LCP to provide the public and the Yolo Habitat Conservancy with an understanding of the potential magnitude of the work to implement the plan. Until these responsibilities are more clearly defined, it is impossible to estimate these costs.
- Public meetings and annual reports. Yolo Habitat Conservancy staff believe public meetings and annual reports are necessary to ensure accountability and transparency regarding the implementation of the Yolo RCIS/LCP, as well as other activities to ensure MCAs are coordinated and local agencies are aware of implementation efforts.
- Local coordination/review/approval of Mitigation Credit Agreements (MCAs). The Yolo Habitat Conservancy and Yolo County want to ensure they are part of the MCA review process: Yolo Habitat Conservancy as the RCIS/LCP implementing sponsor and Yolo HCP/NCCP implementing entity, and Yolo County as the land use authority in which most of the conservation is likely to occur. The language in the RCIS enabling statute related to MCA approval is as follows:

*The creation of mitigation credits pursuant to this section from a conservation action or habitat enhancement action, implemented within the plan area of an approved natural community conservation plan, shall not duplicate or replace mitigation requirements set forth in the natural community conservation plan and shall require the advance written approval of the plan's implementing entity.*



The Yolo Habitat Conservancy wants to see a process in place to ensure MCAs are consistent with the statute in this manner.

The Yolo Habitat Conservancy appreciates CDFW's efforts to review and approve this conservation strategy. We look forward to receiving your comments within the next 30 days. If you have questions, please contact Petrea Marchand at 916-505-7191 or [petrea@yolohabitatconservancy.org](mailto:petrea@yolohabitatconservancy.org).

Sincerely,



Petrea Marchand

Executive Director, Yolo Habitat Conservancy





March 19, 2018

Charlton Bonham  
Director  
California Department of Fish and Wildlife  
1416 Ninth Street  
Sacramento, CA 95814

Regarding: The Yolo Regional Conservation Investment Strategy / Local Conservation Plan.

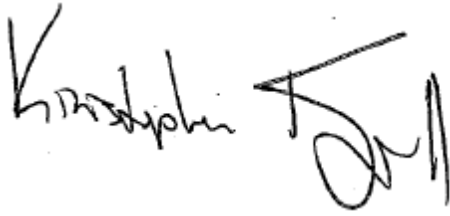
Dear Director Bonham:

In accordance with California Fish and Game Code Section 1852(a), the California Natural Resources Agency (CNRA) requests that the California Department of Fish and Wildlife approve the Yolo Regional Conservation Investment Strategy / Local Conservation Plan (Yolo RCIS/LCP). The proposed Yolo RCIS/LCP encompasses all of Yolo County and has been developed by a collaborative group of state and local public agencies, non-profit organizations, and other stakeholders through a steering committee to help achieve improved conservation and public infrastructure outcomes in the County. CNRA and the California Department of Water Resources (DWR) believe that a successfully implemented Yolo RCIS/LCP could significantly further the State's regional conservation objectives and public infrastructure goals by facilitating meaningful stakeholder engagement, by creating a common vision for regional landscape-level and species-specific conservation, and by empowering and incentivizing the design of public infrastructure projects that produce significant and measurable conservation uplift.

The Yolo RCIS/LCP has been developed in partnership with Yolo County and the Yolo Habitat Conservancy and is consistent with and complements the Yolo Habitat Conservation Plan / Natural Community Conservation Plan (Yolo HCP/NCCP), in accordance with Fish and Game Code Section 1852(c)(10-11). The previously unfinished Yolo Local Conservation Plan – originally intended to complement the Yolo HCP/NCCP – served as a foundation for development of the Yolo RCIS/LCP. The State's 2017 Central Valley Flood Protection Plan and its corresponding Conservation Strategy also contributed significantly to the Yolo RCIS/LCP by incorporating the State's vision for both flood risk reduction infrastructure investments and habitat conservation priorities as part of multi-benefit projects. The Yolo RCIS/LCP also incorporates and seeks to further other State conservation and restoration goals and objectives, such as the EcoRestore initiative.

In accordance with California Streets and Highways Code Section 800.6(j), CNRA is requesting approval of the Yolo RCIS/LCP in part to facilitate mitigation for water infrastructure projects, including but not limited to flood risk reduction projects and fishery conservation projects. As such, the Yolo RCIS/LCP, if approved by the California Department of Fish and Wildlife, shall not count against the limit on the number of regional conservation investment strategies set in Section 1861 of the California Fish and Game Code.

Sincerely,



Kristopher Tjernell  
Special Assistant for Water Policy  
California Natural Resources Agency

1416 Ninth Street, Suite 1311, Sacramento, CA 95814 Ph. 916.653.5656 Fax 916.653.8102 <http://resources.ca.gov>

Baldwin Hills Conservancy • California Coastal Commission • California Coastal Conservancy • California Conservation Corps • California Tahoe Conservancy  
Coachella Valley Mountains Conservancy • Colorado River Board of California • Delta Protection Commission • Delta Stewardship Council • Department of Boating & Waterways • Department of Conservation  
Department of Fish & Game • Department of Forestry & Fire Protection • Department of Parks & Recreation • Department of Resources Recycling and Recovery • Department of Water Resources  
Energy Resources, Conservation & Development Commission • Native American Heritage Commission • Sacramento-San Joaquin Delta Conservancy • San Diego River Conservancy  
San Francisco Bay Conservation & Development Commission • San Gabriel & Lower Los Angeles Rivers & Mountains Conservancy • San Joaquin River Conservancy  
Santa Monica Mountains Conservancy • Sierra Nevada Conservancy • State Lands Commission • Wildlife Conservation Board



# Memorandum

Date: October 16, 2018

To: Charlton Bonham, Director  
California Department of Fish and Wildlife  
1416 Ninth Street  
Sacramento, California 95814

From: Department of Water Resources

Subject: Yolo Regional Conservation Investment Strategy / Local Conservation Plan.

In accordance with California Fish and Game Code Section 1852(a), the California Department of Water Resources (DWR) requests that the California Department of Fish and Wildlife approve the Yolo Regional Conservation Investment Strategy / Local Conservation Plan (Yolo RCIS/LCP). The proposed Yolo RCIS/LCP encompasses all of Yolo County and has been developed by a collaborative group of state and local public agencies, non-profit organizations, and other stakeholders through a steering committee to help achieve improved conservation and public infrastructure outcomes in the County. DWR believes that a successfully implemented Yolo RCIS/LCP could significantly further the State's regional conservation objectives and public infrastructure goals by facilitating meaningful stakeholder engagement, by creating a common vision for regional landscape-level and species-specific conservation, and by empowering and incentivizing the design of public infrastructure projects that produce significant and measurable conservation uplift.

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*K. Thomas  
G. Erickson  
C. Dibble  
R. Macedo*

Charlton Bonham, Director  
October 16, 2018  
Page 2

If you have any questions, please contact me at (916) 653-5805.

Sincerely,

A handwritten signature in blue ink, appearing to read 'K. Tjernell', is written above the printed name.

Kristopher A. Tjernell  
Deputy Director  
Integrated Water Management