

Draft Framework for BDCP Terrestrial Resources (i.e., covered plants and wildlife and non-tidal terrestrial communities) Conservation Strategy

1. Focus on conservation of terrestrial resources on lands that are not on leveed islands and on portions of leveed tracts that are at elevations above existing sea level. This would provide for a strategy of conserving lands around the periphery of the Delta that would link with and complement habitat conservation proposed under adjacent and overlapping plans.
2. Develop preserve design criteria around lands identified in item #1 (e.g., corridor concepts, proximity to existing habitats, restoration of historical habitat gradients).
3. Establish habitat conservation goals and objectives within the Delta and Suisun Marsh based on the available land base and existing biological resources identified in item #1. Develop goals and objectives based on review of goals and objectives for adjacent and overlapping plans and distribution of species habitat and species status within the Delta and regionally. Establish habitat preservation objectives for each species and community expressed as a percentage of habitat present in the planning area and Suisun Marsh after BDCP implementation. Habitat restoration would include sufficient restoration of wetland habitats to mitigate impacts on Section 404 wetlands. Habitat enhancement would focus on management of preserved agricultural lands (e.g., management prescriptions that improve habitat functions for associated covered species beyond normal agricultural practices). The following table identifies the conservation approach for each natural community/land cover type and the covered species habitats supported by them.

Natural Community/Land Cover Type	Preservation	Enhancement	Restoration
Agricultural land cover types	Preservation of existing habitat areas (agricultural and natural) that support, at a minimum, equivalent habitat functions.		
Tidal wetlands			Satisfied with BDCP tidal marsh restoration
Non-tidal emergent wetlands			
Riparian			Satisfied with BDCP riparian restoration
Mudflat			Satisfied with BDCP tidal marsh restoration

4. Establish non-habitat conservation objectives for covered species based on review of species stressors. Objectives should only be established for actions that can reasonably addressed by BDCP. For example, reduction or elimination of pesticide application on preserved lands.
5. Based on impact assessment results, reassess adequacy of restoration objectives. If necessary, expand objectives to include habitat conservation in areas adjacent to the planning area where such conservation would complement achieving goals and objectives of adjacent plans.
6. Develop conservation measures that implement objectives.
7. Develop avoidance and minimization measures that are consistent with implementation of covered activities and conservation measures.
8. Engage DFG and USFWS to obtain concurrence that existing biological resources supported on islands and tracts that could be lost to levee failure are not sustainable and would eventually be lost without implementation of BDCP. Consequently, any mitigation component associated with replacement of biological resources affected by covered activities on these lands should only represent the proportion of value provided until a negotiated future point in time that the resources would be assumed to be lost to levee failure without BDCP implementation (tool for identifying failure points could be DRMS results).
9. If agreement cannot be reached under item #8, seek agreement with DFG and USFWS that mitigation of impacts for biological resources on lands subject to levee failure may be mitigated on other islands and tracts that may be subject to future levee failure and that BDCP would only be responsible for conserving those habitats until such time those levees fail (i.e., loss of these habitats would not constitute changed circumstances and BDCP would not need to maintain levees to preclude future levee failure).

If this is agreed approach, then adjust strategy under item #1 to accommodate habitat conservation on Delta lands subject to inundation with future levee failure.