Agenda: Natural Resource Stakeholder Group (NRSG) Meeting
Date: February 14, 2018
Time: 8:00 am – noon
Location: Board of County Commissioners' Chambers, 200 S. Willow St.

PURPOSE

To agree upon a framework for drafting updated natural resource protection LDRs.

DESIRED OUTCOMES

By noon, we will have:

- An agreement on which of three organizing approaches to use in drafting the regulations
- A list of potential modifications and details to the agreed upon approach
- A framework on how to approach fencing regulations that implement the Board of County Commissioners' direction.

Please review the outstanding questions and outline that follows the agenda, context, and background in preparation for achieving the desired outcomes.

AGENDA

WHAT (CONTENT)	*HOW (PROCESS)*	*WHO*	*TIME*
START-UP: • Welcome/Purpose • Roles • Outcomes/Agenda • Ground Rules • Decision Making	• Review • Clarify • Agree	Tyler/Roby	8:00-8:15 15 minutes
AGREE TO AN APPROACH • Sum of All Species • Individual Species • Vegetation	• Presentation of options • Clarification • Pros/Cons • Agree	• Alex • Alex/NRSG • Tyler/NRSG • NRSG	8:15-9:45 90 minutes
BREAK			9:45-10:00 10 minutes
MODIFICATIONS/DETAILS	• List • Clarification • Build Up/Eliminate	Tyler/NRSG	10:00-10:45 45 minutes
FENCING FRAMEWORK	• Review direction • List and Clarify • Build Up/Eliminate • Agree • Modifications/details	Tyler/NRSG	10:45-11:45 60 minutes
NEXT STEPS	• Review • Agree	Roby	11:45-11:55 10 minutes
MEETING EVALUATION	+/Δ	Tyler	11:55-noon 5 minutes

CONTEXT

As the sole content advisor for the natural resources update, the purpose of the NRSG is to align the natural resource protections in the LDRs with the community's natural resource policies in the context of the entire comprehensive plan.

- The NRSG requested a meeting to discuss the regulations prior to drafting
- This meeting is building on the Board's direction – which mostly followed the NRSG direction
    - Biggest exception is fencing
    - Other variations are minor
- This meeting bridges the gap between the Board's policy direction and the drafting phase
- There are two questions to address prior to drafting (more details below)
    - There is one big question with three defined options – which tiering approach should be used to organize the regulations?
    - There is also one narrower question that is more open ended – how to implement the BCC's direction on fencing
- These questions need to get answered now so we can get a draft to NRSG, so NRSG can review prior to Spring Break, so we can get draft out in April, so the Board can adopt by July, which is the Board's legislative priority for the year
- Based on this meeting staff will draft updated natural resource protection LDRs
    - Staff will distribute an internal first draft to NRSG on March 9
    - NRSG will meet the week of March 19
    - Staff will make revisions based on the NRSG meeting
    - Staff will release an NRSG endorsed draft for public review on April 27
- The intent is that NRSG is bought into the drafting process so they endorse the draft

BACKGROUND

- 2012: Comprehensive Plan adopted, establishing the following community policies
    - Principle 1.1 – Maintain healthy populations of all native species
        - Policy 1.1.a: Protect focal species habitat based on relative critical value
        - Policy 1.1.b: Protect wildlife from the impacts of development
        - Policy 1.1.c: Design for wildlife permeability
        - Policy 1.1.d: Limit human/wildlife conflicts
        - Policy 1.1.f: Require mitigation of unavoidable impacts to habitat
        - Policy 1.1.g: Encourage restoration of degraded areas
    - Principle 1.2 – Preserve and enhance water and air quality
        - Policy 1.2.a: Buffer waterbodies, wetlands, and riparian areas from development
        - Policy 1.2.b: Require filtration of runoff
        - Policy 1.2.c: Monitor and maintain water quality
        - Policy 1.2.d: Improve air quality
- 2013: Vegetation Map completed, that maps the vegetation or water type covering the entire County.
- 2017: Focal Species Habitat Map
    - Phase 1 – Identify 20 focal species habitats representative of the health of the entire ecosystem
    - Phase 2 – Create 20 maps of habitat, one for each focal species habitat, by applying habitat characteristics applied to the vegetation map
    - Phase 3 – Apply a weight to each of the habitat maps based on habitat scarcity and species vulnerability, then stack the maps on top of each other and sum the weighted value of the overlapping maps to create a communitywide map of relative value
- 2017: BCC Policy Direction on the natural resource protection LDRs
    - Use the best available science to permit development in a way that protects sufficient habitat and connectivity to reduce human wildlife conflicts and promote native species resiliency.

- The presence of wildlife habitat on a property should affect the location of allowed development and the allowance for Conditional Uses. The extent of the effect should depend on how valuable the habitat is and the intent of the underlying zoning district; in some instances incentives may be more appropriate than restrictions.
- Waterbody, groundwater, and wetland protections should focus on water quality and habitat function. Protection of water quality and habitat function in the context of water dependent recreation should be achieved through a combination of these standards and the limitations on Conditional Uses.
- The Focal Species Habitat Map, and/or other best available science, should be the basis of any evaluation of a site's natural resources. In addition, a boots-on-the-ground, site-specific study of varying level of detail is needed when multiple habitat values need to be compared, relatively valuable habitat exists, or when a specific natural resource boundary needs to be identified. Site-specific, boots-on-the-ground studies should be as consistent as possible.
- Impacts to habitat, water, wetlands, and setbacks around water and wetlands should be mitigated.
- The County should have a habitat restoration and mitigation bank program, but still prioritize onsite mitigation. The preference is for a third party program that does not require County administration.
- Agricultural operations and bona fide habitat restoration should be exempt from all natural resource protection standards including environmental analysis and mitigation. Partial exemptions for other types of development discussed by the Natural Resources Stakeholder Group should be used as direction to inform the tiered system of regulations.
- Natural resource protections should acknowledge existing impacts and allow for by-right expansion that does not increase the existing impact, including intensity of use. There should be some consideration and/or incentive that the expansion be designed to reduce the existing impact when possible, especially related to water quality.
- Sites classified as "agricultural" by the Assessor that are at least 70 acres should be exempt from wildlife friendly fencing standards. Create a working group to identify a collaborative approach to allowing continued permeability and migration through development.
- In addition to the existing conservation incentives (PRDs and Floor Area Option), development flexibility should be provided to projects that provide additional natural resource protection. A fund should also be created to pay landowners for preservation and restoration of natural resources.

QUESTIONS

There are two questions to be addressed at the meeting. The first is foundational and affects multiple aspects of the LDRs. The second relates to the Board's direction on fencing.

WHICH HABITATS ARE THE MOST VALUABLE?

The Comprehensive Plan calls for a "tiered system of protection so that the most critical habitat and movement corridors (as defined by the Focal Species Habitat Map) receive the highest level of protection and site specific study." Since the beginning of this natural resource protections update we've been talking about how to "tier". In developing potential regulations to implement the Comprehensive Plan it has become clear that the "tiering" conversation has two components – the protections and the site specific study. It has also become clear that how to "tier" is a technical implementation exercise. The real question is which habitats are the most valuable. Three valuation approaches are presented below in the context of how they affect:

- What habitat will be prioritized for protection (Div. 5.1 of outline), and
- How we identify the properties that need the highest level of boots-on-the-ground study (Sec. 8.2.2 of outline)

The three valuation approaches are all based on the Focal Species Habitat Map (FSHM). They vary by which information from the FSHM is prioritized and how the focal species habitat map (or inputs for the map) are used.

At the meeting we will:

1. Go through the below outline of the natural resource protection LDRs.
2. In each section staff will identify the implications of the three different habitat valuation approaches. By the meeting, staff will have example sites to look at to help understand the implications.
3. After clarification of any questions about the outline, the NRSG will be asked to select one of the habitat valuation approaches as a general framework for the entire LDRs. Even though the presentation of the habitat valuation approaches is broken into sections below, a single habitat valuation approach will be chosen that applies as a framework to all sections.
4. Once one of the habitat valuation approaches is selected as a general framework, there will be an opportunity to brainstorm potential modifications and details to the general framework. This might include borrowing some ideas from one of the approaches not chosen. (Post-Break, Modifications/Details portion of Agenda)

In preparation for the meeting please think about which approach you prefer, why, and what modifications or details are important to your selection. Staff has provided some +'s and –'s to each approach below as a starting point for the Pros/Cons portion of the agenda. Staff's analysis looks at the implications to both ecosystem protection and predictable realization of property rights – the two Comprehensive Plan goals being balanced through the natural resource protection LDRs.

Please contact Roby with any questions. Staff will be available Friday, Monday, and Tuesday to sit down with stakeholders, or groups of stakeholders, to help them prepare.

HOW TO IMPLEMENT THE BCC'S DIRECTION ON FENCING?

Staff has not prepared options to choose from for the second question. At the meeting we will look at the BCC's direction, brainstorm potential approaches, select a general approach, and then discuss details of that approach. The BCC's direction is:

> Sites classified as "agricultural" by the Assessor that are at least 70 acres should be exempt from wildlife friendly fencing standards. Create a working group to identify a collaborative approach to allowing continued permeability and migration through development.

The first sentence is definitive. The second sentence is the focus of the conversation. The observation made by the Board is that as we continue to subdivide, create wildlife crossings, etc. movement corridors for wildlife become more defined. Wildlife movement is constricted at the intersection of sprawl development and ranches. The question is what can we do in subdivisions and on agricultural land to proactively ensure permeability through the corridors we are creating, without punishing agriculturalists already achieving the goal?

OUTLINE

DIVISION 5.1. WATER QUALITY AND HABITAT PROTECTIONS

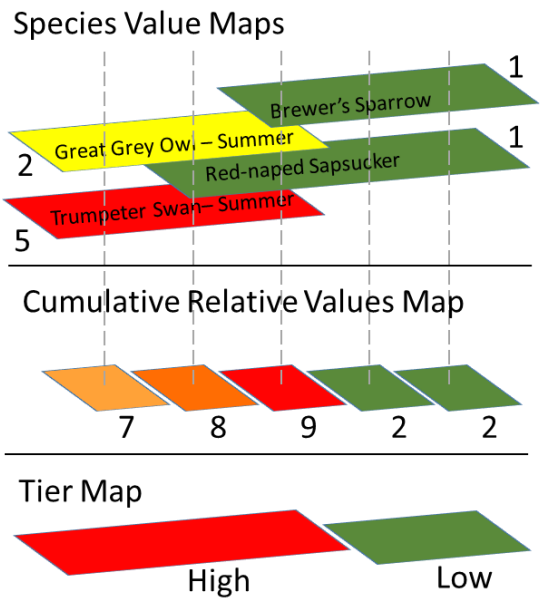
SECTION 5.1.1. PURPOSE AND INTENT

The purpose of the Division is to implement Principles 1.1 and 1.2 of the Comprehensive Plan. While protection of water quality and wildlife habitat are both purposes of the Division, water quality is the foundation of a healthy ecosystem and is the first lens of the regulations. The purpose and intent statement will include:

- Description of the relationship of this division to other divisions relating to stormwater quality, wastewater treatment, wildlife feeding, natural resource analysis, etc.
- Reference to the methods, findings, and products of the Vegetation Map and Focal Species Habitat Map

Depending on which approach is taken, the intent statements will vary.

A. The "Species Value Approach" relies on the 20 species-specific habitat maps that are the inputs of the FSHM, by ordinally ranking the criteria based value that was assigned to each individual species' potential habitat map, to protect the habitats of greatest criteria based value on a property.



B. The "Cumulative Relative Value Approach" relies on the final FSHM to protect the areas of a property with the greatest cumulative relative value once the individual criteria based values are summed.

C. "Tiered Assessment Approach" – The third approach relies on 3 landscape scale tiers to determine the level of regulations and analysis applicable to the site followed by a site specific evaluation (either on the ground or from existing data) to determine the highest ecological values in the context of the site. Ecological values will be determined based on a list of natural resource topics and an assessment of the natural resources present. Movement/ migration corridors will be addressed by a second overlay.

Species Value	Cumulative Relative Value	Tiered Assessment
• The individual species maps from the FSHM are the regulatory maps • (Note that a tier map is also used to determine the appropriate level of review)	• The FSHM is the regulatory map • (Note that a tier map is also used to determine the appropriate level of review)	• A Tier Map is the regulatory map because the appropriate standards for avoidance, minimization, and mitigation are determined through the site specific review
+ Applies a landscape level lens, refined by site-specific study + Protecting the relative value of the most sensitive habitats, may get at the "resiliency" direction + Map provides predictability about where development will be located	+ Applies a landscape level lens, refined by site-specific study + Relative value protected through a gradation of as many "tiers" as there are value sums + Map provides predictability about where development will be located	+ Ensures compatibility with landscape through appropriate review of site and surroundings + Follows vision of authors and contributors of the FSHM + Addition of consideration of other natural resource topics could get at "resiliency" direction + Provides flexibility about where development can be located on the property
– Reliance on landscape level analysis may ignore site-specific context – Field verified maps may look different from maps in FSHM – The individual species maps were not intended by their creators to be regulatory, they were intended to be a model	– Reliance on landscape level analysis may ignore site-specific context – Field verified map may look different from FSHM – The FSHM was not intended by its creators to be regulatory, it was intended to be a model	– Reliance on site analysis requires County staff, consultant, or cooperating agency to qualitatively review analysis, which opens the door for legal contest of every decision – Map does not provide predictability about where development will be located

SECTION 5.1.2. APPLICABILITY

In all approaches, the standards of Division 5.1 will apply across the County. How they apply will be determined by the water and habitat that exists on a property and which habitat valuation approach is chosen.

Regardless of approach, the applicability section will address the Board's direction that nonconforming physical development and use will be allowed to expand in its nonconforming location so long as the expansion meets the minimization standards for the area of existing development (see below). Further flexibility in minimization standards will be provided if water quality protections are improved for the existing nonconformity. Relying on the FSHM in either the "Species Value Approach" or "Cumulative Value Approach" makes implementation of this direction easier, because existing development identifies as lower value in the FSHM.

Full exemptions from the standards of the Division will be established in this Section for sites of larger than 70 acres taxed as agriculture, and habitat enhancement projects that meet the definitions of enhancement in Sec. 5.1.6.

SECTION 5.1.3. AVOID IMPACT TO WATER QUALITY AND HABITAT

The Comprehensive Plan calls for a, "tiered system of protection so that the most critical habitat and movement corridors receive the highest level of protection." The avoidance section will establish the valuation approach requiring development to be located in the lowest value portion of the site. Because each approach is based on the FSHM, each approach will rely upon a "field guide" being added to the Definitions Division of the LDRs that defines the 20 different species-specific habitats in the FSHM.

Regardless of approach this section will include allowances for developing a higher valued area in order to meet other Federal, State, or County requirements. Regardless of approach, this section will also include prohibition of Conditional Uses in mid to high value areas and prohibition of Accessory Uses in high value areas.

Species Value	Cumulative Relative Value	Tiered Assessment
• Avoid areas of the property with species habitat layers with the highest relative value • Water and wetlands would get added at the top of the ranking to be protected before other habitat definitions – buffers would be defined as part of the definition of water/wetlands • Relies on relative valuation of species habitat maps in Table 2 (page 12) of the FSHM	• Avoid areas of the property with the highest sum of underlying species habitat layers • Water, wetlands, and buffer protection is baked into cumulative value because riparian areas are important habitat to many species • Relies on entire FSHM methodology	• Protect water and wetlands through buffers that increase with tier value • Avoid the habitat determined to be the most valuable through the ecological assessment of the property, natural resource factors required to be considered increase with tier value • Relies on the Tier Map to ensure the appropriate level of site analysis is required to get an adequate ecological assessment
+ Ordinal ranking achieves maximum protection feasible of the highest ranked habitats on a site + Ordinally ranked LDRs do not require qualitative review of a consultant's site analysis + Based on defined criteria already mapped	+ Numerical ranking achieves maximum protection feasible of the highest ranked areas of a site + Numerically ranked LDRs do not require qualitative review of a consultant's site analysis + Based on defined criteria already mapped	+ Standards for all of the natural resource topics considered are applied in context of the site instead of one-size-fit-all + Standards are short and sweet because they provide a topical framework
– Ordinal rankings only identify landscape level importance, they	– Numerical rankings only identify general importance, they may	– Large sites in the low and medium tier would not receive

may not be applicably on a specific site – The criteria valuation of the FSHM was not intended to be an ordinal ranking	not be applicably on a specific site –	the level of water quality protection they could receive – The combination of objective buffers and evaluated functional assessment could be confusing

SECTION 5.1.4. MINIMIZE AND MITIGATE UNAVOIDABLE IMPACTS

Once the lowest value habitat on a site has been identified pursuant to the avoidance standards above, minimization and mitigation standards are applied to determine how that habitat can be impacted in order to achieve the Floor Area and Basic Uses allowed on the site. Because each approach is based on the FSHM, each approach will rely upon a "field guide" being added to the Definitions Division of the LDRs that defines the 20 different species-specific habitats in the FSHM.

Species Value	Cumulative Relative Value	Tiered Assessment
• Minimization and mitigation standards are based on FSH Characteristics and organized by species in the same ordinal rank as the avoidance standards e.g. 1. River. If within 100ft of floodplain: ▪ As far from bank as possible. ▪ Must establish buffer. 2. Wetland. If within 30ft: ▪ Impact buffer before wetland (may require 2 stories to avoid wetland) ▪ Mitigate at 2:1 for impact 3. Bald Eagle Year round. ▪ As far from nest as possible out to 660ft ▪ As far as possible from water and forage sites as defined in "field guide" and must establish buffer ▪ Limit cottonwood and coniferous tree removal, and must mitigate 2:1	• Based on FSHM Study and expert opinion of habitat characteristics to create an ordinal ranking that doesn't require drilling through the FSHM to look at species specific standards • Minimization and mitigation standards are based on FSH Characteristics and are ordinally ranked. e.g: 1. If within 100ft of floodplain, as far from bank as possible, and must establish buffer 2. If filling a wetland, 2:1 mitigation 3. If within 660ft of a bald eagle's nest, as far from eagles nest as possible and mitigation	• Minimization and mitigation standards are based on the natural resource impacted e.g. 1. If within water buffer (varies by tier): ▪ As far from bank as possible. 2. If within wetland buffer (buffer size varies by tier): ▪ Impact buffer before wetland (may require 2 stories to avoid wetland) ▪ Mitigate at 2:1 (varies by tier) for impact 3. If within eagle nest buffer (varies by tier), as far from eagles nest as possible and mitigation 4. For habitat fragmented. ▪ Mitigate at 2:1 (varies by tier) for the habitat impacted
+ Standards based on why (what species) the habitat is being protected + Specific standards reduce subjectivity in implementation	+ Standards based on landscape level ordinal ranking + Specific standards reduce subjectivity in implementation	+ Standards based on mitigation criteria developed per the natural resource impacted
– Specific standards are inflexible to site context	– Landscape level ordinal rankings ignore site context – Specific standards are inflexible to site context	– Flexibility of site specific standards requires qualitative review by the County

SEC 5.1.5. STANDARDS FOR MITIGATION AND ENHANCEMENT PROJECTS

This section establishes standards for manmade habitat, whether that creation is required (mitigation) or voluntary (enhancement).

This section will include an order of preference for mitigation methods with findings to be made prior to moving to a less preferred method. The value referred to will vary by the regulatory map chosen, but the concept will be the same regardless of approach.

1. On-site enhancement that logically improve the habitat/vegetation value of the site
    - Can only move to #2 if there is no reasonable way to improve the habitat/vegetation value anywhere on the site
2. Off-site enhancement that logically improves the habitat/vegetation value of the off-site location
    - Will include a mitigation fund option in the future
    - Can only move to #3 if there is no reasonable way to improve the habitat/vegetation value of an off-site location
3. In-lieu fee
    - First option for projects only requiring an EC (see Section 8.2.2 below)
    - Goes into fund for conservation purchases or enhancement projects administered by TCSPT

Regardless of approach this section will also include:

- A definition of enhancement and/or restoration of a resource from its current state to a more valuable state. This may be a series of definitions by resource.
- A prohibition on conversion of habitat to habitat of a lower value, unless it meets the definition of Landscaping in Division 5.5.
- Standards for ensuring longevity of manmade habitat.
- Standards for the creation of manmade ponds (including definition of a pond).

SECTION 5.1.6. STANDARDS TO ALLOW WILDLIFE PERMEABILITY

General permeability standards related to connecting habitats would be the first set of standards in this section (if there are any). The approach to wildlife permeability varies by habitat valuation approach, but in all cases anticipated updates to the migration mapping currently included in the FSHM can be easily incorporated into the system. In all cases the goal is to ensure permeability standards are applied where they are appropriate and are not applied where they are not applicable.

If there are no general permeability standards, this is just the fencing section. Fencing is its own topic on the agenda, independent from which tiering approach is used. See the discussion of the outstanding fencing question above.

Species Value	Cumulative Relative Value	Tiered Assessment
• No permeability standards here because migration would remain one of the 20 “species habitat” maps included in the above standards (rank of 4 out of 6)	• No permeability standards here because migration contributes to FSHM score and will be addressed in minimization ordinal ranking	• Wildlife movement standards applied to a separately mapped overlay
+ Permeability contextualized within the greater relative value comparison	+ Permeability contextualized within the greater relative value calculation	+ Acknowledges that permeability through otherwise low value areas is important + Mapped applicability is clear
– Permeability issues could be overshadowed by other concerns	– Standards may not apply to a site depending on ordinal ranking – Permeability issues could be overshadowed by other concerns	– The combination of these standards with the avoidance and minimization standards may be confusing

DIVISION 5.2 RESERVED

Based on the reorganization of standards current Division 5.2 will no longer be needed.

DIVISION 5.7 GRADING, EROSION, AND STORMWATER (EXISTS)

SECTION 5.7.3. STORMWATER MANAGEMENT (ADD TO EXISTING SECTION)

The stormwater management standards currently address only quantity of stormwater. Some water quality management is realized through stormwater quantity controls, sediment and erosion controls, buffer regulations, and vegetation protection. In addition to regulatory programs, both local governments and NGOs in Teton County and the Town of Jackson participate in water quality improvement projects. Future, updated regulations should amend Sec 5.7.3 to add stormwater quality standards because stormwater transmits many of the pollutants into the surface and ground water. Since December we have researched options for stormwater quality standards, and have come to the conclusion that we need more study. Right now we do not know enough about how much of our precipitation reaches surface water to formulate effective regulations. Staff will add water quality study to our Work Plan and bring back stormwater quality standards at a later date after further study.

DIVISION 6.4 OPERATIONAL STANDARDS (EXISTS)

SECTION 6.4.9. WILDLIFE FEEDING (MOVE EXSITING 6.4.9 TO 6.4.11)

The current wild animal feeding standards (currently Sec. 5.1.3) and bear conflict area standards (currently 5.2.2) have less to do with the location or size of development and more to do with the ongoing use of a property. Such standards are found in Division 6.4. Consolidation into a single section addresses the fact that the wild animal feeding standards are basically the generally standards applicable to all wildlife, while the bear conflict standards are specific standards applicable to bears.

- No major changes to wild animal feeding standards are proposed
- Implement certified bear resistant trash storage Countywide

SECTION 6.4.10. AIR QUALITY

The current air quality standards (currently Sec. 5.1.4) have less to do with the location or size of development and more to do with the ongoing use of a property. Such standards are found in Division 6.4. No changes to the air quality standards are proposed.

DIVISION 8.2 COMMON PROCEDURAL STANDARDS (EXISTS)

SECTION 8.2.2 WATER AND HABITAT PROTECTION ANALYSIS

The purpose of this section is to ensure sufficient information is provided in an application to review compliance with Division 5.1. Regardless of approach, there are three types of Water and Habitat Protection Analysis. An applicant may choose to do more analysis than is required. None of the types constitute an approval each is just information to be reviewed with the rest of the application.

Analysis Type	Environmental Analysis	Environmental Review	Environmental Checklist
Inventory	• Field verification	• Field verification	• Use existing map
Alternatives Analysis	• Yes	• No	• No
County Review	• Prior to submittal	• With submittal	• With submittal
Analyst	• Qualified consultant • Qualified County staff • County completed or hired when EA determines intensity (e.g. CUP, PUD, PRD)	• Qualified consultant • Qualified County staff	• Applicant • Qualified consultant • Qualified County staff

Which type of analysis is applicable to a property will be determine by a Tier Map. The Tier Map will be developed to implement the BCC's direction that field verification is needed on sites with the highest valuable habitat, sites in high need of alternatives analysis, or sites with resources such as wetlands that require delineation. The Tier

Map will also consider zoning (allowed Floor Area and Basic Uses) when evaluating whether an alternatives analysis will benefit water quality and habitat protection. Because each approach is based on the FSHM, each approach will rely upon a "field guide" being added to the Definitions Division of the LDRs that defines the 20 different species-specific habitats in the FSHM.

Species Value	Cumulative Relative Value	Tiered Assessment

• Analysis type determined by Tier Map created based on FSHM and Zoning
  ○ Alternatively the Tier Map criteria could just be codified without making a second map
• EA field verification would be a verification of the habitat species maps for the site and vicinity
• ER approach assumes existing FSHM is accurate enough to figure out best location
• ER field verification would be an evaluation of the habitat attributes in the lowest value area
	• Analysis type determined by Tier Map created based on FSHM and Zoning
	  ○ Alternatively the Tier Map criteria could just be codified without making a second map
	• EA field verification would be a verification of the habitat species maps for the site and vicinity yielding a site-specific FSHM
	• ER approach assumes existing FSHM is accurate enough to figure out best location
	• ER field verification would be an evaluation for the habitat attributes or vegetation types in the minimization/mitigation standards in the lowest value area
		• Analysis type determined by Tier Map created based on FSHM
		  ○ Tier Map also has regulatory purpose in defining variable standards
		• Sites with multiple tiers must follow the process of the highest tier on site, which will probably mean lots of EAs
		• EA and ER field verification would be an identification of buffered resources, habitats, and the other natural resource topics on the site and vicinity, and a functional assessment of the habitats.

+ Takes into account habitat and zoning in determining when an alternatives analysis is needed	+ Takes into account habitat and zoning in determining when an alternatives analysis is needed	+ Ensures all valuable habitats are studied even on small properties + Ensures qualified professionals are reviewing most parcels
		− Because of regulatory function Tier Map cannot take into account Zoning without sacrificing protection