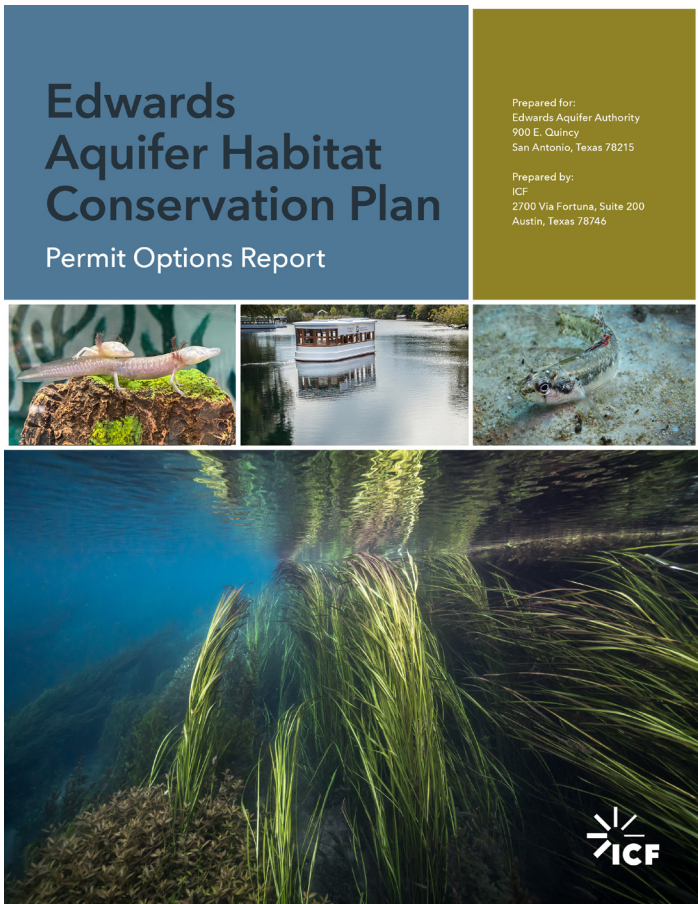


Options for the Incidental Take Permit

The **Permit Options Report**, prepared in 2020 by ICF to inform the permit renewal process, identified five potential options to the plan and permit.



Option 1: Allow Permit to Expire

The current permit would expire March 31, 2028. Permittees would need to apply for Incidental Take Permits for their activities likely to result in take of listed species.

While the Permittees would not allow the permit to expire, this option serves as a useful reference point to demonstrate the value of the EAHCP.

Option 2: Renew Permit

The simplest form of HCP amendment, this option would only change the expiration date of the permit.

Pros	Cons
Simple administrative process Lowest cost and shortest timeline	Current plan remains unchanged Cannot seek plan improvements

Option 3: Administrative Changes

Permittees would be able to make non-substantive changes to the plan and its implementation that represent clarifications or minor administrative amendments (e.g., changing method of biological monitoring).



Pros	Cons
Can be relatively simple with low cost and time Common approach used on many HCPs Targeted to fix only certain issues	Can only be used for minor issues Cannot be used to extend permit term Plan clarifications may be difficult to track

Option 4: Major Permit Amendment

Changes that cannot be done administratively must be done with a substantive or major amendment (e.g., adding or removing a Covered Species).



Pros	Cons
Addresses issues that administrative changes cannot Opportunity for interested parties to review changes Supported by federal grants	More time and cost involved than any other option Could trigger a new Federal Register notice and a supplemental or new environmental analysis

Option 5: Replace EAHCP with New HCP

A replacement HCP is typically considered for HCPs that are very old (>20 years old) or when situations arise in which there are new regulations, or the plan is not functioning well. **The criteria for this option do not apply to the EAHCP.**

Pros	Cons
Can clarify and update the HCP based on lessons learned Can update data, science, and assumptions	Interested parties’ perception of “starting over” Potential increased mitigation and monitoring requirements

Report Recommendation

The **EAHCP Permit Options Report** recommends a combination of **Option 3** and **Option 4**:

- Continue to make administrative changes
- Assess effects of climate change
- Apply for major permit amendment, including early coordination with the USFWS
- Permit amendment would extend permit by 15–30 years
- Complete permit amendment and new interlocal agreements prior to permit expiration on March 31, 2028

