

DRAFT
PIMA COUNTY REGIONAL FLOOD CONTROL DISTRICT'S REGULATED
RIPARIAN HABITAT
OFFSITE MITIGATION GUIDELINES

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1.0 INTRODUCTION

Chapter 16.30 of the Floodplain and Erosion Hazard Management Ordinance No. 2010-FC5 (Ordinance) stipulates that an applicant (private property owner, government agency, land developer, or builder) can mitigate for unavoidable impacts to regulated riparian habitat (RRH) through onsite mitigation. If onsite mitigation is investigated and deemed not feasible for the applicant, then offsite mitigation may be proposed, per Section 16.30.050.D:

“Mitigation banking or other alternative mitigation measures as approved by the Board. At the request of the property owner, and with Board approval, the mitigation plan requirement under this chapter may be waived by contributing funds to an account established and administered by the District for the purpose of offsetting damage to riparian habitat.”

As outlined in the Ordinance, an offsite mitigation proposal will require Pima County Regional Flood Control District (District) and the Flood Control District Board of Directors (Board) review and approval. Currently, there are three offsite compensatory mitigation options available, including:

- (1) Restoration of disturbed or degraded RRH on another parcel of land that provides comparable or “in-kind” biological function similar to the RRH proposed for disturbance and appropriate long-term protection measures,
- (2) Land exchange proposals, and
- (3) In-lieu monetary fee.

It should be noted and stressed that offsite mitigation opportunities become an option only after the applicant has shown that avoidance is not possible, impacts to RRH have been minimized, and the ability to mitigate entirely onsite has proven unfeasible. Compensation for RRH loss (in-lieu fee) is not meant to replace avoidance and minimization.

The following document, hereafter referred to as the Offsite Mitigation Guidelines (Guidelines), describes how the In-Lieu Fee (ILF) program will function and be administered and provides guidance for alternative offsite compensatory mitigation options.

2.0 MITIGATION IN-LIEU FEE

2.1 In-Lieu Fee Option

One option for providing compensatory mitigation for disturbance of RRH is a fee in-lieu of onsite riparian habitat mitigation. The in-lieu fee (ILF) program has been updated and simplified for ease of use by applicants, and incorporates changes to the riparian protection regulations adopted under Ordinance 2005-FC2 and 2010-FC5. During the process of updating the Guidelines several options for assessing ILF were examined (Appendices A and B). The ILF option selected for use in the Guidelines is based on the amount and type of habitat disturbed, standardized costs for onsite mitigation (derived from representative real project costs) and an adjustment for inflation.

The previous method of fee calculation placed the burden of estimating costs for onsite mitigation on the applicant or property owner. This resulted in cost estimates that varied with each project, depending on the person assessing the fee and source of the cost information.

To ensure consistency and ease of use, the new fee structure is based on the cost to mitigate onsite, with standard costs determined by the District. The revised method has standardized costs for each onsite mitigation requirement and incorporated these costs into an easy to use spreadsheet (Appendix E), whereby the user can input certain parameters, resulting in an ILF cost output. The following mitigation components are incorporated into the spreadsheet:

- Plant material (container trees and shrubs),
- Labor for installing plant material,
- Hydroseed (seed, mulch, water, cost for machinery, and labor to apply seed) (cost/acre),
- Irrigation system (materials and labor for installation) (cost/acre),
- Five years of maintenance and monitoring (removal of noxious/invasive weed species, water, replacement plants, etc.), and
- Other miscellaneous work, such as grading and/or construction of water harvesting basins.

A standard value is assigned for each mitigation component and is based on average cost estimates obtained from local vendors and consultants. The spreadsheet allows each component of the mitigation plan to be calculated separately so that total mitigation costs can be accurately assessed for each project. For example, a single-lot property owner will typically pay a smaller fee than the developer of a commercial or residential property since they have the ability to minimize design and irrigation costs.

Although use of the standard ILF calculation spreadsheet is encouraged, the option to hire a qualified professional to prepare an ILF estimate is still available to applicants. The estimate shall account for mitigation plan components, as listed above, and follow the ILF checklist provided in Appendix F.

For commercial and residential developments (subdivision plat or development plan), an additional surcharge will be applied to the ILF based upon riparian habitat classification and percentage of disturbance. The surcharge does not apply to single-lot development (residential permits). The purpose of the surcharge is to encourage avoidance and minimize impacts to Important Riparian Areas (IRA) and other high quality habitat. The following requirement will apply:

Apply the following surcharge to the base ILF when the noted percentage of total mapped riparian habitat is disturbed:

For Class H, Xeroriparian Classes A and B, and IRA

20-39% = 5% surcharge added to the base ILF

40-59% = 10% surcharge added to the base ILF

≥60% = 20% surcharge added to the base ILF

Xeroriparian Classes C and D

No surcharge applies

Table 1 provides an example of how the surcharge would be applied toward the ILF depending upon the amount of total mapped RRH disturbed.

Table 1. Cost of Surcharge per \$1,000 of ILF

Surcharge	amt. of total RRH Disturbed	Amount of Surcharge (\$)	Total Cost with Surcharge(\$)
+ 5%	20-39%	\$50	\$1,050
+ 10%	40-59%	\$100	1,100
+ 20%	≥60%	\$200	1,200

3.0 IN-LIEU FEE PROGRAM ADMINISTRATION

3.1 ADMINISTRATIVE PROCESSING OF IN-LIEU FEES

3.1.1 FEE COLLECTION

Single-lot Residential Development.

A single-lot residential development proposal disturbing more than 1/3 acre of RRH requires a Floodplain Use Permit (FPUP), which must be obtained prior to issuance of the building or grading permit. When onsite mitigation occurs, a RHMP is approved prior to issuance of the FPUP with mitigation occurring after construction is completed. When an ILF is proposed, fees are collected prior to issuance of the FPUP. This process ensures that a property owner compensates for disturbance of RRH prior to impacts occurring.

Collection Procedure

Fees will be collected prior to issuance of the FPUP. Under special circumstances, the property owner may request that payment of the ILF be delayed until prior to final inspection. If this option is chosen, a hold will be placed on the final inspection until the fee is collected.

Subdivision and Commercial Development

For projects following the development review process, i.e. subdivision plats or development plans, ILF proposals are approved prior to Final Plat or Development Plan approval. However, depending upon the project, many months or years may pass from the time of project approval to construction, delaying disturbance of RRH. In these situations, it may be appropriate to collect the fee prior to approval of the grading or paving plan.

Collection Procedure

ILF payment must be received prior to approval of the grading or paving plan.

Fines collected from RRH violations

On May 4, 2010, the Board adopted Ordinance No. 2010-FC5. The new Ordinance allows the District to impose civil penalties for violations of the code, including violations related to the unpermitted disturbance of RRH. The District will deposit fines obtained from violations resulting from RRH disturbance into the ILF bank.

Administrative Processing

When a check for the ILF is submitted, the applicant and/or property owner is issued a receipt, detailing the amount of the check, check number, and project or FPUP number. This information is then input into the ILF tracking database and deposited into the ILF program bank account.

3.1.2 ANNUAL REPORTING

An annual report, documenting the total amount of funds collected and disbursed throughout the year will be prepared at the end of each fiscal year. The annual report will document annual income deposited into the ILF bank, annual withdrawals for expenditures, a summary of property acquisitions by parcel number and provide a brief section on funds spent for land stewardship activities and low-tech restoration.

3.2 DISTRICT EXPENDITURE OF IN-LIEU FEE PROGRAM FUNDS TO COMPENSATE FOR HABITAT LOSS

District priorities for expenditure of ILFs are:

Acquisition and Preservation

Preservation of high value habitat is best achieved through acquisition. Acquisition in fee title of land containing riparian resources is an effective method for protecting and preserving intact habitat. Additional methods for the preservation of riparian resources is by protecting shallow ground water sources through acquisition or transfer of water rights, and protection of hydrologic functions and key features located in the watershed upstream of riparian areas.

Restoration and Enhancement

Restoration and enhancement of riparian vegetation can be a viable and desirable option for the use of ILFs. The receiving area for restoration and/or enhancement of habitat must be able to support restoration efforts over the long term. Physical site characteristics, restoration objectives and design, and legal mechanisms that lead to long-term self-sustaining habitat must all be taken into account. Other restoration activities under this priority include stewardship practices that allow degraded habitat to heal and naturally restoring processes that protect riparian habitat or water supply.

3.2.1 OPTIONS FOR EXPENDITURE OF IN-LIEU FEE FUNDS: ACQUISITIONS, LAND STEWARDSHIP, AND LOW-TECH RESTORATION

Several options are available to the District for expenditure of ILF funds to compensate for impacts to RRH. Options include the following; acquisitions (land, water rights, conservation easements), land stewardship, and low-tech restoration.

3.2.1.a ACQUISITIONS

Funds can be used for the acquisition of riparian resources. Several types of acquisitions could be made with funds received through the ILF program and may include land, water rights and/or conservation easements. All acquisitions are subject to Board review and approval.

3.2.1.a.1 *Land.* Land would be selected based upon the resource value as determined by the Riparian Acquisition Map (Section 5.0). Funds would be used to purchase land in fee-simple. Water, mineral, and other rights may or may not be included in the purchase. The land will be offered long-term protection through the use of a conservation easement or other restrictive covenant.

3.2.1.a.2 *Water Rights.* Water rights adjoining sensitive riparian areas would be purchased using ILF funds.

3.2.1.a.3 *Conservation easement.* Conservation easements on lands containing high value riparian habitat would be purchased using ILF funds.

3.2.1.b LAND STEWARDSHIP

In this option, funds would be distributed for stewardship of riparian habitat on existing Pima County-owned lands. Stewardship activities would include fencing to prevent unauthorized access by off-road vehicles and livestock, long-term monitoring, and invasive species control.

3.2.1.c LOW-TECH RESTORATION

Low-tech, low-cost restoration techniques will be implemented on existing Pima County-owned lands. Low-tech restoration techniques may include hydroseeding disturbed areas, incorporating water harvesting features, installation of check dams, or other methods to enhance and restore existing riparian habitat.

4.0 ALTERNATIVE OFFSITE MITIGATION OPTIONS

Several alternative offsite mitigation options are available to projects undergoing the development review process (subdivision plats and development plans). Options include mitigation of an offsite parcel of land, land exchange, or other offsite compensatory mitigation option. An alternative offsite mitigation proposal will need to document the relationship between the ecosystem functions being impacted on the project site and the functions which are compensated for by the mitigation site.

Only one alternative offsite mitigation option is available to single-lot property owners. This is the option to mitigate on an offsite parcel of land in accordance with the onsite mitigation guidelines.

4.1 MITIGATION OF AN OFFSITE PARCEL OF LAND

4.1.1 Basic Requirements

Mitigation in accordance with the onsite mitigation guidelines may be performed on another parcel of land with approval of the District. The proposed parcel must contain comparable riparian habitat, or may be used if the parcel is suitable for enhancement or restoration of degraded riparian habitat. The alternate parcel may be under the same ownership as the parcel impacted by development or may be under different ownership. In either case, a deed restriction that protects the mitigated area(s) in perpetuity must be recorded. Additionally, the parcel must adhere to the following mitigation standards, adapted from standards drafted and approved by the Multi-Species Conservation Plan (MSCP) Implementing Agreement (IA) Committee:

- If the proposed mitigation land will be split off from an existing parcel of land, the mitigation land shall be located and consolidated in the most biologically sensitive portion(s) of the property;
- Mitigation land should be configured to minimize harmful edge effects;
- Mitigation land should be contiguous with any conserved land on adjacent properties;
- Preferably, mitigation land shall be located within the same watershed, as that impacted by development;
- Mitigation land should be free of all significant harmful land use practices that impair mitigation values (e.g., off-road vehicle use, livestock use/grazing, etc.), or if harmful land use practices have occurred in the past, the land may be restored and protected from future harmful land practices.

As an option to the onsite guideline requirement for mitigation of an offsite parcel of land, an applicant may propose mitigation through use of a Riparian Habitat Preservation Plan (RHPP).

4.1.2 Riparian Habitat Preservation Plan (RHPP)

Mitigation of an offsite parcel of land may follow requirements of a Riparian Habitat Preservation Plan (RHPP) for larger projects (those that are required to go through the platting, specific plan, comprehensive plan, and/or rezoning processes). For these projects,

an additional option to the basic requirements for mitigation of IRA, Class H, and Xeroriparian Classes A-D is available. Applicants may propose a Riparian Habitat Mitigation Plan (RHMP) as an alternative to the basic requirement. A RHPP is designed to support the success of onsite preservation of riparian areas and the mitigation of disturbed habitat, as well as serve the special needs of a given project within the context of its natural resources, both upland and riparian. The minimum requirement for a RHPP is to meet the conservation goals and objectives of the Conservation Land System (CLS). The proposed RHPP must preserve, enhance, provide connectivity, overall function, and/or restore an impacted riparian system and/or its surrounding areas. Please be advised that proposal of a RHPP is subject to the discretion and approval of the District and the Board.

A RHPP may be an available option when traditional mitigation does not address unique ecological or project conditions. **Applicable conditions may include:**

1. Highly fragmented and/or degraded riparian habitat;
2. Sites with other unique ecological functions where a blended preservation plan would be more functional or appropriate; and
3. Linear projects, such as roadways and sewers, or linear portions of projects where avoidance is not possible and linear mitigation options would provide limited value.

A RHPP may include, but is not limited to:

1. Alternative options for restoring degraded riparian habitat;
2. Preserving or enhancing wash corridors containing riparian habitat and transition zones that were not mapped under the Riparian Classification Maps to increase connectivity;
3. Conservation of adjacent uplands along riparian habitat to maintain diversity and watershed function,
4. Combination of onsite and offsite conservation or mitigation; and
5. Other conservation efforts that meet unique site ecological conditions including preservation of keystone species (e.g., ironwood and saguaro).

The RHPP must be equivalent to or exceed the ecological value of a traditional RHMP. Determination of equivalent ecological value will require a biological assessment of the project site by a qualified professional to evaluate the site's biological resources and must reference and incorporate the unique features determined by the Natural Resource Assessment Report (NRAR) into the RHPP. The NRAR (Appendix C) must also address the overall connectivity and function of preserved riparian habitat on the offsite parcel and how the proposed RHPP will enhance the overall function of riparian habitat.

Degraded habitats located on an offsite parcel can be restored in a number of ways, which may include restoration of degraded habitat or restoring connectivity of habitat with techniques other than those outlined in the onsite mitigation guidelines. These techniques may include cattle exclusion and/or regulation of grazing intensity or season, exotic species control for the entire undeveloped RRH area and possibly upland areas (this option will depend upon the severity of the infestation and type of invasive species present), must be coincident with other restoration techniques, such as hydroseeding, and must not overlap with invasive species control required by other departments. Basically, if a property owner has already been required to control invasive species, it will not be option for mitigation under Chapter 16.30), short-term use of effluent for establishment of a mitigation area (i.e., spray fields to establish native seed mix), abandoning functioning wells in areas of shallow

groundwater, obtaining water rights for a particular property and transferring the rights to Pima County, channel stabilization efforts, water harvesting, and other restoration techniques that have been demonstrated to have substantial riparian habitat benefits.

A condition for use of a RHPP is that a proposal must show sustainability over the long term. For example, use of irrigation may be used to establish seed mix; however, long-term use of irrigation water to artificially increase the density of existing riparian habitat and/or for use in the establishment of high water use plant species that would require irrigation for the duration of the plant's life, would not qualify as a suitable alternative option. Proposed RHPPs are subject to the discretion and approval of the District and the Board.

4.2 LAND EXCHANGE

For projects undergoing the development review process (subdivision plats and development plans), exchange of land in-lieu of onsite mitigation may be allowed. Land exchange proposals must provide multiple benefits such as preservation of valuable habitat corridors, provide habitat connectivity and proximity to habitat preserved on public land, parks, preserves and habitat restoration projects.

Large-scale projects offer unique situations because they have the potential to affect relatively large areas of RRH. While protecting RRH onsite is preferred and could well prove to be an asset to the development, the community, and the County's goals for long-term riparian protection, a need for offsite mitigation may still occur. To satisfy offsite mitigation requirements for disturbance to RRH, a developer may choose to apply the option that will allow them to acquire land elsewhere in the County and transfer that land to the District for long-term protection of its riparian and biological resources. This option will be considered on a case-by-case basis for larger developments only and is not available for smaller developments or single dwelling residential development on a single lot. All land acquisition proposals are subject to District and Board review and approval.

To assist the applicant in locating desirable parcels for land acquisition, the District has provided a land acquisition map indicating the general location of lands that would qualify for the land exchange compensatory mitigation option. This map is called the Riparian Acquisition Map (see Section 5.0). In addition to the map, a land acquisition checklist has been provided in Appendix G.

For lands to qualify for RRH mitigation and transfer to the District, they must contain biological and hydrological value that is comparable to or of higher quality than the RRH that is disturbed. Values that need to be considered include, but are not limited to, water availability, vegetation density, and biological productivity. Therefore, an evaluation of the land proposed for transfer, performed by a qualified professional, shall be required as part of the developer's land acquisition proposal to the District. The purpose of long-term riparian protection is to promote stable flow conditions and natural functions along watercourses and floodplains County-wide by preserving and/or enhancing riparian vegetation and habitat. In order to meet the purpose and intent of protecting riparian habitat, selection of land appropriate for the land acquisition and transfer option shall be based on the information provided by the applicant's NRAR (Appendix C).

Key points to remember when selecting land for exchange include the following:

- A biological evaluation of the land, performed by a qualified biologist, shall be required as part of the land acquisition proposal;

- Preference will be given to land within the same watershed as the RRH that is being disturbed. If land cannot be identified within the same watershed, exchange of lands outside the watershed will be an option;
- Land must have equivalent or higher quality riparian habitat values (biological and physical) than those that are being disturbed;
- Include mechanisms to protect resources and conservation values in perpetuity; and
- All land acquisition proposals are subject to District and Board review and approval.

For applicants who are interested in the land exchange option, a **pre-submittal meeting with the District will be required prior to submittal of the mitigation proposal and NRAR**. Mitigation lands proposed for the land exchange option will require **District pre-approval**.

Exchanged property shall be evaluated for the properties' natural resource values, CLS status, contribution to County MSCP goals, and long-term costs of management and monitoring. The County may, at its discretion, request a monetary donation or endowment from the beneficiary to cover management costs.

4.3 PROTECTION OF MITIGATION LAND

Long-term protection of mitigation land is critical to success of the offsite mitigation program. Long-term protection can be achieved through transfer of mitigation land in fee title to the County or placement of a conservation easement or other restrictive covenant on the mitigation lands. Example conservation easement language can be found in Appendix D.

4.4 OTHER OFFSITE COMPENSATORY MITIGATION OPTIONS

A developer may purchase water rights that directly impact and/or support groundwater dependant riparian ecosystems. Acceptance of water rights for mitigation is subject to the District and Board review and approval. This mitigation option requires District pre-approval and interested applicants are required to attend a **PRE-SUBMITTAL MEETING WITH THE DISTRICT** to review proposed water rights acquisition(s).

5.0 LAND ACQUISITION CRITERIA

Lands that may qualify for acquisition under the offsite mitigation program shall be selected based on the following criteria:

Landscape Level:

- Landscape position (Maeveen Marie Behan Conservation Lands System (CLS) categories)
- Covered species habitat (Priority Conservation Areas)

Watershed/Project Site Level:

- Adjacency to existing Preserves;

- Adjacency to major watercourses;
- Connectivity between riparian areas;
- Riparian Classification Maps – Riparian vegetation plant community (Class H vs. Xeroriparian) and density (TVV);
- Water Availability (Class H, shallow groundwater/intermittent and perennial streams/springs);
- Hydrology/Hydraulics – Ability to support riparian vegetation (FEMA floodplains, locally mapped floodplains);
- Adjacency to reaches of watercourses defined by the 2002 SDCP Report “Riparian Priorities” (available for viewing and download at <http://www.pima.gov/CMO/SDCP/reports.html>);
- Adjacency to existing District-/County-owned property; however, this criterion is subject to verification of future uses of the land prior to being considered. Certain Pima County-owned lands are set aside for future development;
- Within Habitat Protection Priority Areas or Private and state priority areas, pursuant to the Conservation Bond Program (2004 and 2010);
- Connectivity with parks, refuges, existing Pima County restoration projects, and undeveloped land;
- Adjacency to platted Natural Open Space (NOS);
- Special Elements (bosques, cottonwood/willow, springs, etc.);
- Historical perennial flows;
- Constructed vs. natural riverine systems; and
- Adjacency to or use of Transfer of Development Rights (TDR) Program and Sending Areas. Development rights are severed from these lands, which allows for higher density development in receiving areas (growth areas). TDR Sending Areas must have comparable RRH values.

The criteria will also include the location of these lands in relation to existing County-owned property, state parks, and federal lands (refuges, national forest, and BLM lands, etc.) and works toward preserving inter-connected corridors associated with watercourses throughout the County.

To assist a property owner or developer in assessing property(s) for the criteria listed above, a Riparian Acquisition Map (RAM) was developed. The RAM is a GIS based map that incorporates information derived from reports and data developed in support of the Sonoran Desert Conservation Plan (SDCP). These reports spatially define biologically sensitive lands at a landscape level. Additional information regarding the RAM can be found in Appendix G.

6.0 CONCLUSIONS

The Guidelines provide a necessary tool that will allow for RRH to be mitigated in a timely manner with impacts, provides an alternative to onsite mitigation, and adequately compensates for lost riparian habitat function. This document addresses problems with methods used or contemplated in the past and meets the goals of the District with respect to an offsite mitigation program. Furthermore, this document has assessed and addressed the true costs of mitigation and long-term management of riparian habitat. The options proposed are easy to understand, use, implement, and manage and are based on sound financial and scientific principles, providing an avenue for the regulated community to mitigate for negative impacts to RRH through offsite compensatory mitigation.

APPENDIX A

DEVELOPMENT OF THE IN-LIEU FEE OPTION

APPENDIX B

SWCA REPORT – OPTION FOR ASSESSING IN-LIEU FEES

APPENDIX C

NATURAL RESOURCE ASSESSMENT REPORT (NRAR) REQUIREMENTS

**APPENDIX D
CONSERVATION EASEMENT TEMPLATE**

APPENDIX E
IN-LIEU FEE CALCULATION SPREADSHEET AND EXAMPLES

**APPENDIX F
IN-LIEU FEE SUBMITTAL CHECKLIST**

**APPENDIX G
LAND ACQUISITION CHECKLIST**