

**SCREENING FORM FOR LOW-EFFECT HCP DETERMINATIONS
and Environmental Action Statement**

I. Project Information

- A. Project name and location:** AT&T Portable Generator Storage Facility, Dunnigan, Yolo County, California.
- B. Affected species: Central Distinct Population Segment (DPS) of the California Tiger Salamander (*Ambystoma californiense*) (tiger salamander),** federally listed as threatened, state listed as threatened. No other federally listed species would be affected by the project.
- C. Project size:** The property owned by AT&T is approximately 45 acres. Approximately 1.24 acres of suitable upland habitat for tiger salamanders will be permanently lost due to project construction and 0.33 acre will be temporarily impacted.
- D. Brief project description, including minimization and mitigation plans:**

1. Project Description

The Proposed Action consists of the construction of a new storage facility to house Emergency Restoration Generators on an existing AT&T property, near Dunnigan, California. The existing facility occupies approximately 9 acres of the 45-acre property and houses telecommunications (i.e., voice and data) and electrical equipment in an underground facility. Several concrete/cinderblock buildings, and a paved parking lot surrounded by a metal security fence with a keypad entry, are located above ground.

As a first phase of emergency power restoration preparation, AT&T will acquire and store seventy-five (75) 5.5 kW and 7.5 kW Emergency Restoration Generators inside trailer vans uncovered on the paved portion of its Dunnigan facility. A 110v GFI outlet, to be installed as part of the Phase I work, will power each of the 75 uncovered trailers. All improvements included in Phase I will take place within the existing paved portion of the site. The proposed low-effect Habitat Conservation Plan, for the California tiger salamander, for the AT&T Portable Generator Storage Facility (HCP) does not anticipate adverse affects to tiger salamanders.

Under Phase II (Proposed Action), AT&T plans to construct a metal building with approximate dimensions of 100 feet 6 inches by 251 feet immediately north and adjacent to the existing paved surface to allow on-site storage of fifty (50) 40-kw portable diesel generators and one hundred seventy-five (175) 5-kw portable diesel generators. These 225 generators would be stored on trailers, but would not be connected to a power source. The building, which would have an east-west orientation, would include vertical support columns spaced 25 feet apart on center along the 251-foot dimension and at each corner, to support the roof. There would be open sidewalls to allow trailers to be easily moved in and out by forklifts or similar equipment. A 45-foot-wide asphalt driveway would surround the building on all four sides to provide access to the building by forklifts.

The footprint of the storage building would encompass 25,101 square feet and surrounding asphalt and concrete paving (including the loading dock) would be 33,233 square feet, for a total paved surface area of 58,334 square feet, or approximately 1.34 acres. In addition, 0.15 acre would be permanently lost through the creation of water dispersion bioswales, resulting in a total of 1.49 acres of permanently lost upland. However, 0.25 acre of the upland permanently lost includes lands immediately north of the northern boundary of the existing paved area, which was compacted and partially covered with asphalt during construction of the existing facility. Because this land is not suitable habitat for tiger salamanders [due to its lack of burrows], the total amount of permanent tiger salamander upland habitat loss is 1.24 acres.

The construction of the facility would include both cut (2,162 cubic yards [CY]) and fill (5,272 CY). Thus, the volume of fill material that would need to be imported to create a level pad is approximately 3,110 CY.

Operation of Phase II would involve only minimal and intermittent (monthly) activities. Maintenance would involve periodic testing of each generator. Because the generators are intended for use only following major disasters, they would be deployed only during the infrequent occurrences of such disasters.

2. Mitigation Measures

Currently, storm water on the paved portion of the property is collected at the perimeter fencing through catch basin drains in the pavement. These drains empty onto the hillside surrounding the property and/or areas riprapped with rock.

The grading and drainage for the Phase II site was designed to mimic existing conditions while utilizing best management practices to reduce storm water pollution impacts. This will be done by providing surface drainage for the majority of the site to infiltration planters. The planters will be designed in accordance with Regional Water Quality Control Board recommendations to provide maximum filtration of storm water pollutants. In addition, the planters are being designed with a flow control structure to attenuate the increase in storm water runoff resulting from the Proposed Action. The infiltration planters will discharge to outfalls designed with energy dissipaters to prevent downstream erosion. The outfalls will be placed in areas that were previously receiving concentrated flow.

Since the purpose of the Proposed Action is to store diesel generators, a key environmental safety feature is to provide spill containment. The storage area will be covered to minimize possible stormwater contamination. The concrete building pad of the storage area will slope inward to a pair of drains connected to a 320-gallon concrete sand-oil separator. Once the sand and oil are separated, water would be diverted to the storm drain system and discharged to the eastern section of the property, away from the wetland areas on the western portion of the site. Any sand and oil that remains in the tank will need to be periodically removed by vacuum truck and disposed of off-site. Since the storage area is covered minimum runoff is expected.

Other avoidance and minimization measures to be implemented during project construction are discussed in the low-effect HCP.

II. Does the HCP fit the low-effect criteria in the HCP Handbook? (*The answer must be yes to all three questions below in order to be considered a low-effect HCP. If the answer is no to any of the questions, then the project should not be considered a low-effect HCP. Each “yes” must be accompanied with an explanation.*)

A. Are the effects of the HCP minor or negligible on federally listed, proposed, or candidate species and their habitats covered under the HCP prior to implementation of the mitigation plan?

Yes. A computer search of the California Natural Diversity Database (CNDDDB) was conducted prior to undertaking field surveys. Biological surveys of the entire AT&T property were conducted on July 20, 2010 by Eric Hansen, M.S., (to assess the property for its suitability to support tiger salamanders), and on August 17, 2010, by Miriam Green, M.S., and Tom Skordal, B.S., (to document biological and wetland resources on the property). A Low-Effect Habitat Conservation Plan, tiger salamander Habitat Evaluation, and Wetland Delineation report are provided under separate cover.

The project site is located in the foothills of the Coast Range on hilly terrain at an average elevation of about 240 feet. The surrounding landscape is dominated by non-native annual grassland, interspersed with patches of oak woodland. An abundance of swales and drainages are present throughout the general area, and ephemeral waters persisting through the spring are present within a seasonal pond supplied by facility runoff at the base of the hill immediately west of the facility. Both California ground squirrels (*Spermophilus beecheyi*) and microtine rodents are present on the project site, and rodent burrows and crevices that provide dry-season habitat for tiger salamanders were observed in both the upland and seasonal wetland habitats on-site. Subterranean refuge was sparse or non-existent where the earth had been compacted and dense gravel base was present around the perimeter of the existing facility footprint, including a portion of the area proposed for construction of Phase II.

The project site is located on a hilltop that generally drains from the north, east, and west to a series of creeks and swales. The project site was not graded, grazed, or disked at the time of 2010 field surveys, but property extending from northwest of the project site was disked in a broad swath east to the Tehama Colusa Canal, approximately 1.25 miles east of the project site. At the time of the 2010 surveys, the lands south of County Road 6 were planted in what appeared to be winter wheat. As such, the lands surrounding the project site are all heavily disturbed and in intensive agriculture, providing little habitat value for tiger salamanders at the time of the site visits.

The project site lies within the extant range of the tiger salamander and is situated within a dense cluster of tiger salamander records associated with the Dunnigan Hills (Jennings and Hayes 1994, CNDDDB 2010). Six records fall within 3.1 miles (5 km) of the project site; one record (CNDDDB occurrence #408) falls within the existing facility footprint, in the retention ponds situated along the facility's eastern edge. Adult tiger salamanders

were observed on the project site as recently as October 25 and 27, 2010, following heavy rains. Larval tiger salamanders were observed in the seasonal wetland complex on the project site during April and May 2011.

Construction of the storage facility would result in the permanent loss of 1.24 acres of tiger salamander upland habitat. The area closest to the existing fence line represents poor habitat because compacted asphalt is present on the surface restricting its use by burrowing animals; however, farther away from the fence the annual grassland is undisturbed and provides suitable habitat for burrowing animals, which in turn, provide upland refugia for tiger salamanders. The Proposed Action would not affect any aquatic habitat; therefore, no loss of tiger salamander breeding habitat would result from the Proposed Action.

B. Are the effects of the HCP minor or negligible on other environmental values or resources (e.g. air quality, geology and soils, water quality and quantity, socio-economic, cultural resources, recreation, visual resources, etc.) prior to implementation of the mitigation plan?

Yes. The HCP would permit the construction of a single storage facility and surrounding pavement, which would not generate significant pollutant emissions, either during construction or operations. The Proposed Action would have a minor effect on geology and soils because 58,334 square feet would be paved to support a storage facility. The Proposed Action would have only minimal effects on water quality because the design includes drainage for the majority of the site to infiltration planters, and a sloped floor within the shed draining to a separator to ensure that any sediment or hazardous materials are contained on-site. Further, water from the shed floor, after treatment, will be discharged to the eastern portion of the property, away from the sensitive wetland habitats located in the western portion of the property. Finally, construction will require a grading permit from the County of Yolo, which will ensure that erosion is minimized.

In the short-term, the Proposed Action would have only minimal socioeconomic effects, as it would involve only the short-term activity associated with the construction of the storage facility and the purchase and mobilization of the emergency generators. The Proposed Action would not change the socioeconomic characteristics of this portion of Yolo County, as it would not create new permanent employment and would neither create nor eliminate any housing.

Peak & Associates, Inc. (2010) conducted a cultural resources records search with the Northwest Information Center, contacted Native American groups, and conducted a field inspection of the project site on September 21, 2010 in order to identify any cultural resources that might be affected by the Proposed Action. No cultural resources were identified within the proposed construction area or within a 30-meter radius around this area and no letters were received from any Native American groups. Peak & Associates, Inc. (2010) prepared a report to support a finding of “no effect” under the National Historic Preservation Act. This report has been submitted under separate cover.

The Proposed Action would not have any effects on recreation because the site does not contain any recreational facilities and no new demand for recreation would be generated.

The Proposed Action would take place adjacent to the northern edge of the developed portion of the property, and involves constructing an industrial structure on a site already containing a number of industrial buildings and other structures. Views of the site are available from County roads 6 and 86, neither of which is listed as a scenic corridor. The new structure itself would be consistent with the industrial uses already on the property, and would be largely hidden from view from these roads by the rolling terrain and the existing buildings and other structures on-site.

C. Would the impacts of this HCP, considered together with the impacts of other past, present and reasonably foreseeable similarly situated projects not result, over time, in cumulative effects to environmental values or resources, which would be considered significant?

Yes. The impacts of the HCP would be minor. No other projects are anticipated in the action area, and the rest of the site is expected to continue to be lightly grazed for vegetation and fire control. Thus, even considered together with other past, present, and reasonably foreseeable similar projects, the Proposed Action would not result in cumulative effects on environmental values or resources.

III. Do any of the exceptions to categorical exclusions apply to this HCP? (from 516 DM 2.3, Appendix 2)

Would implementation of the HCP:

A. Have significant adverse effects on public health or safety?

No. The HCP would have no adverse effects on public health and safety, as it only involves the construction of a storage structure on already-developed land. Operation would involve only minimal and intermittent activities. Maintenance would involve periodic (monthly) testing of each generator. Because the generators are intended for use only following a major disaster, they would be deployed only during the infrequent occurrence of such a disaster.

B. Have adverse effects on such unique geographic characteristics as historic or cultural resources, park, recreation or refuge lands, wilderness areas, wild or scenic rivers, sole or principal drinking water aquifers, prime farmlands, wetlands, floodplains, or ecologically significant or critical areas, including those listed on the Department's National Register of Natural Landmarks?

No. As described above under II.B, no historic or cultural resources have been identified on the project site, nor are there any parks or recreation facilities on the site. The project site is not in or near a wilderness area or adjacent to a wild or scenic river. Water for the site is currently provided from a well, but the addition of the storage shed and the storage

of portable generators on-site would not substantially increase the use of water at the site and thus would not affect a principal drinking water aquifer.

The AT&T property is located in an agricultural area and the parcel is zoned by Yolo County as an Agricultural Exclusive Zone; however, the existing facilities have been in existence for more than 40 years. The project site is not located on prime, unique farmland, or on farmland of Statewide Importance. Site soils are shown in the Yolo County General Plan under Irrigated Land Capability Classification as Class VII, having “very severe limitations that make them unsuitable for cultivation and that restrict their use mainly to grazing, forestland and/or wildlife habitat.” The site is shown as “Other Land” on the Important Farmlands Map, indicating, “*Land not included in any other mapping category*” (County of Yolo 2009).

The AT&T property is not in the floodplain of any watercourse, and is rated “X” by FEMA (FEMA 2010). Zone X is the area determined to be outside the 500-year flood and protected by levee from 100-year flood. The site is not on the Department of Interior, National Park Service’s Register of Natural Landmarks and is not an ecologically significant area.

Gibson & Skordal, LLC (2010) prepared a Jurisdictional Delineation Report for the property (submitted under separate cover). This report identified 0.7999 acre of potential waters of the United States on the AT&T property, including 0.3330 acre of seasonally inundated pond, 0.0325 acre of seasonal wetland swale, 0.0906 acre of ephemeral channel, and 0.3438 acre of waste pond. None of these features would be impacted by construction or operation of the storage facility, which would be located entirely in an upland portion of the property, or by implementation of the HCP. Also, the Proposed Action includes mitigation measures to control polluted runoff, to prevent increased runoff from the storage area, and to treat and divert storm water from the newly paved area so as to avoid hydrologic impacts on the seasonally inundated pond, the seasonal swale, and the ephemeral channels.

C. Have highly controversial environmental effects?

No. No controversial environmental effects would result, as construction of the storage facility is consistent and in compliance with development rules within the County of Yolo. The Applicant is currently in compliance with state and federal environmental laws and has addressed, in the HCP and in other environmental commitments listed above, all environmental concerns regarding the property. Implementation of the HCP includes purchase of tiger salamander credits at an existing conservation bank approved by the USFWS, and no controversial environmental effects are expected.

D. Have highly uncertain and potentially significant environmental effects or involve unique or unknown environmental risks?

No. Implementation of the HCP would not create uncertain or potentially significant environmental effects. The environmental effects of the Proposed Action are well understood, minor in scope and extent, and the expected effects on tiger salamanders are

minor. Implementation would not involve unique or unknown environmental risks because the proposed construction activities are generally routine, would not involve substantial sub-surface work, and would represent a continuation of existing uses on the site.

E. Establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?

No. Implementation of the HCP and the Proposed Action would not establish a precedent for future actions with potentially significant environmental effects, as the Proposed Action involves only routine and intermittent activities, and no significant environmental impacts are anticipated.

F. Be directly related to other actions with individually insignificant but cumulatively significant environmental effects?

No. No other development projects within the action area have been identified.

G. Have adverse effects on properties listed or eligible for listing on the National Register of Historic Places?

No. A record search by the Northwest Information Center and a field survey of the project site were conducted in September 2010 (Peak & Associates, Inc. 2010). Neither revealed any properties on or near the project site that is eligible for listing on the National Register of Historic Places.

H. Have adverse effects on listed or proposed species, or have adverse effects on designated Critical Habitat for these species?

No. Other than the tiger salamander, for which a Low-Effect HCP has been prepared, the only other federally listed species identified in the general area is palmate-bracted bird's-beak (*Cordylanthus palmatus*), which is listed as endangered. This species is restricted to seasonally flooded, saline-alkali soils in lowland plains and basins at elevations of less than 155 m (509 feet). This habitat type is not known from within the Action Area, so no adverse effects on palmate-bracted bird's-beak are expected.

The action area is located within the Central Valley Geographic Region, Unit 1, Dunnigan Creek Unit, of designated critical habitat for the Central DPS tiger salamander. The unit consists of 2,730 acres bordered by Interstate 5 on the east, Bird Creek on the south, and Buckeye Creek on the north and west. The Proposed Action will result in the loss of 1.24 acres of upland habitat within this critical habitat unit. This represents 0.00045 percent loss of critical habitat in this unit, which represents a fraction of a percent of upland habitat loss.

The fraction of a percent loss of critical habitat from the Proposed Action will not diminish the function of the unit as critical habitat, especially since all of the breeding habitat would remain intact, and the remainder of the property would continue to provide overland passage and subterranean retreats.

I. Have adverse effects on wetlands, floodplains or be considered a water development project thus requiring compliance with either Executive Order 11988 (Floodplain Management), Executive Order 11990 (Protection of Wetlands), or the Fish and Wildlife Coordination Act?

No. Implementation of the HCP and the Proposed Action would not have adverse effects on wetlands, as those wetlands and other waters of the United States identified on the project site would not be impacted by project construction (see also response to III.B. above). The Proposed Action is not considered a water development project, so compliance with the Fish and Wildlife Coordination Act or Executive Orders 11988 and 11990 are not required.

J. Threaten to violate a Federal, State, local or tribal law or requirement imposed for the protection of the environment?

No. Implementation of the HCP and the Proposed Action would not violate Federal, State, local or tribal law imposed for the protection of the environment. No tribal interests were identified in completing the outreach associated with compliance with Section 106 of the National Historic Preservation Act (Peak & Associates, Inc. 2010).

IV. ENVIRONMENTAL ACTION STATEMENT

Within the spirit and intent of the Council on Environmental Quality's regulations for implementing the National Environmental Policy Act (NEPA), and other statutes, orders, and policies that protect fish and wildlife resources, I have established the following administrative record. Based on the analysis above, this HCP qualifies as a "Low Effect" HCP as defined in the Service's Habitat Conservation Planning Handbook (November 1996). This action fits categorical exclusion C(2) of 516 DM 8.5, and can be categorically excluded from NEPA as provided by 40 CFR 1508.4, 516 DM 2, and 516 DM 8. Therefore, a more extensive NEPA process is unwarranted, and no further NEPA documentation will be made.

Other supporting documents (provided under separate cover):

California Natural Diversity Database (CNDDDB). Commercial Version, October 2010. Geographic Information Systems (GIS) data and computer printout of sensitive species records on the USGS Wildwood School and Dunnigan 7.5-minute topographic quadrangles. California Department of Fish and Game, Natural Heritage Division, Sacramento, CA.

County of Yolo. 2009. 2030 Countywide General Plan - Agriculture and Economic Development Element. October 2009.

Federal Emergency Management Agency (FEMA) 2010. Flood Insurance Rate Map 06113C0100G. Created October 12, 2010.

Gibson & Skordal, LLC. 2010. Jurisdictional Delineation Report, AT&T Portable Generator Storage Facility, Yolo County, California. Prepared for Salas O'Brien Engineers, Sacramento, CA. October 2010.

Hansen, E.C. 2010. Evaluation of Potential California Tiger Salamander (*Ambystoma californiense*) Habitat on the AT&T Emergency Generator Storage Project in the Dunnigan Hills, Yolo County, California. Prepared for Salas O'Brien Engineers, Sacramento, CA. August 2010.

Miriam Green Associates. 2010. Low-Effect Habitat Conservation Plan for the California Tiger Salamander (*Ambystoma californiense*) for the AT&T Portable Generator Storage Facility, Yolo County, CA. Prepared for AT&T Services, Sacramento, CA. November 2010. Revised June 2011.

Parfrey, Eric. Principal Planner, Yolo County Planning, Resources and Public Works Department. Telephone call with Craig Stevens on September 14, 2010.

Peak & Associates, Inc. 2010. Cultural Resources Assessment of the Proposed AT&T Portable Generator Storage Facility, Dunnigan, Yolo County, California. October 8, 2010.

Signature Approval:

Susan K. Moore
Field Supervisor
Sacramento Fish and Wildlife Office

Date