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Screening Form

Low-Effect Incidental Take Permit

Determination and National Environmental Policy

Act (NEPA) Environmental Action Statement

I. HCP Information

A. **HCP Name:** St. Martin's Habitat Conservation Plan for the threatened Yelm subspecies of the Mazama pocket gopher (*Thomomys mazama yelmensis*) in Lacey, Washington

B. **Affected Species:** Yelm subspecies of the Mazama pocket gopher

C. **HCP Size:** 139 acres of a 232 acre plan area

D. Brief Project Description

Description: The Saint Martin's Abbey (the Applicant) has applied for an incidental take permit (ITP) to cover the take of individuals of a listed subspecies incidental to redevelopment and maintenance of up to six new buildings, athletic fields, associated parking lots, and sidewalks, storm water facilities, other utilities, landscaping; replacement of existing buildings; and other ground-disturbing activities described in the HCP on property owned in Thurston County, Washington. The property is known to be occupied by the threatened Yelm subspecies of the Mazama pocket gopher (*Thomomys mazama yelmensis*), hereafter referred to as the Yelm pocket gopher. The Applicant acknowledges that it will not be possible to avoid all adverse effects to this species and its habitat while constructing the proposed buildings and infrastructure. On that basis, St. Martin's Abbey prepared a habitat conservation plan (HCP) (Saint Martin's HCP 2021) in partial fulfillment of the requirements under the Endangered Species Act of 1973, as amended (16 USC 1531 *et seq.*) (ESA) to obtain an ITP from the U.S. Fish and Wildlife Service (Service) authorizing otherwise prohibited take.

The proposed project is the redevelopment and maintenance of an existing private university campus. Covered activities would include construction and maintenance of up to six new buildings, athletic fields, associated parking lots, sidewalks, storm water facilities, other utilities, landscaping; replacement of existing buildings; and other ground-disturbing activities described in the HCP at St. Martin's Abbey/Saint Martin's University Campus, 5000 Abbey Way SE, Lacey, Washington. The final number of buildings and activities may vary in response to University growth and needs, so the HCP describes the maximum amount of activities proposed for coverage. The Applicant requests a 20-year permit term.

The total plan area of 232-acres (Plan Area) includes 31-acres of grasslands that serve as Yelm pocket gopher habitat (Table 1, St. Martin's HCP 2021). Covered activities include construction and ground disturbance, as described in the HCP, which will occur within a 139-acre redevelopment area (Permit Area) entirely within the Plan Area. The applicant anticipates impacting up to 12 acres of Yelm pocket gopher habitat that exists in the Permit Area. Due to differences in gopher occupancy, the applicant has proposed a system to quantify the impacts to the Yelm pocket gopher based on the extent and permanence of impacts to habitat, and the applicant refers to this as calculations of functional acres. Functional-acre is a term used only at the project site to evaluate habitat impacts because vegetation cover type and gopher occupancy on the project site varies, and some impacts are only temporary or would result in habitat changes rather than loss. Different multipliers based on habitat quality and impact type are used to calculate the maximum number of functional-acres to be impacted during the 20-year permit term. For example, lower value multipliers are used for temporary impacts such as short-term infrastructure repairs or landscape maintenance activities. Higher value multipliers are used for impacts that result in permanent loss of gopher-occupied areas. These multipliers, applied to different acres of land use and habitats in the permit area, results in the impact to four functional acres of the original 12-acres of impacted Yelm pocket gopher habitat. This HCP will consider impacts to the four functional acres over 20-years that result from this analysis (Table 4, St. Martin's HCP 2021).

The Applicant's HCP describes a conservation program to minimize and mitigate unavoidable impacts to the Yelm pocket gopher and its habitat that may occur in the Permit Area during construction of the project. The Applicant will implement two types of actions to offset anticipated impacts to Yelm pocket gophers within the permit area. First, the permanent protection of four acres (hereafter "four actual acres") of higher-quality habitat through the purchase mitigation credits from the Service-approved Leitner Prairie conservation site is expected to offset impacts to four-functional acres of impacted habitat. However, Leitner Prairie site is located in a different service area than those of the Yelm pocket gophers found on St. Martin's University campus. Because the Leitner Prairie mitigation site is in a different Service Area than the Project Site at St. Martin's University, the Applicant will provide additional mitigation by committing to maintain existing habitat conditions on 26-acres of occupied grassland in the Plan Area for the Yelm pocket gopher for the 20-year permit term.

Purpose and Need and Applicant Goals: The Service's purpose in considering the proposed action is to fulfill our statutory obligations under section 10(a)(1)(B) of the ESA to approve, approve with conditions, or deny the ITP application. The applicant's purpose is to undertake otherwise lawful construction activities that may result in the incidental take of a wildlife species listed under the ESA, in accordance with the requirements of the ESA.

Section 10 of the ESA specifically directs the Service to issue ITPs to non-Federal entities for incidental take of endangered and threatened species resulting from otherwise lawful activities, when the issuance criteria in section 10(a)(2)(B) of the ESA are met. Once we receive an application for an ITP, we review the application to determine if it meets issuance criteria. We also ensure that issuance of the ITP and implementation of the HCP complies with other applicable Federal laws and regulations such as: the National Environmental Policy Act (NEPA); National Historic Preservation Act; treaties; and EOs 11998, 11990, 13186, 12630, and 12962. In addition, the Service enforces the Bald and Golden Eagle Protection Act, and

other requirements of the ESA, such as compliance with section 7(a)(2). If we issue an ITP, we may condition the permit to ensure the permittee's compliance with Bald and Golden Eagle Protection Act, and other applicable requirements of the ESA.

The Service received an ITP application from St. Martin's Abbey on September 9, 2020. If the application request is approved and the Service issues a permit, the ITP would authorize St. Martin's Abbey to take the Yelm pocket gopher incidental to the proposed development actions (see below) and implementation of the conservation program described in the HCP (St. Martin's HCP 2021). The Service prepared this Environmental Action Statement to document our compliance with the requirements of NEPA, and to use this information to inform decisions concerning this ITP application.

Requested Permit Term: The Applicant requested a permit term of 20 years.

Lands Covered under the HCP and ITP: The Applicant's HCP includes a 139-acre Permit Area where construction and maintenance of up to six new buildings, athletic fields, associated parking lots, sidewalks, storm water facilities, other utilities, landscaping, replacement of existing buildings, other ground-disturbing activities, and implementation of the conservation program described in the HCP (2021) will take place on up to 12 acres (4 functional acres) of habitat within the Permit Area. The HCP's conservation program includes maintenance of existing habitat conditions on 26 acres of grassland occupied by Yelm pocket gophers, and the purchase of four actual acres of occupied habitat at the USFWS-approved Leitner Prairie conservation site.

Species Occurrence: The Yelm pocket gopher has been documented to occur on the Applicant's property (covered lands) (Ch. 2 and Figure 5, St. Martin's HCP 2021). Groups of mounds indicative of Yelm pocket gopher burrow systems were found on the property, and contiguous soils and vegetation types on the property suggest that soils throughout the entire site may be suitable for occupancy. The Plan Area is mostly developed, impervious, or forest (non-habitat). Gophers occur on 12-acres of degraded and fragmented habitat in the redevelopment area, and on 26-acres on larger fields in the Plan Area dedicated to onsite conservation (See figures 2, 3, 4, 5, St. Martin's HCP 2021).

The total number of Yelm pocket gophers likely to be present is unknown, and observing or documenting instances of take may be difficult or impossible because Yelm pocket gophers remain underground for most of their lives. The loss of suitable habitat on the project development site will therefore serve as a surrogate for the amount of take anticipated over the term of the requested permit. The project site is not located within designated critical habitat for the Yelm pocket gopher.

Goals: The Applicant's goal is to construct and maintain University buildings and infrastructure within the 139-acre Permit Area. The biological goals of the HCP are to contribute to the conservation of the Yelm pocket gopher by permanently conserving and maintaining suitable habitat necessary for Yelm pocket gopher breeding, feeding, and sheltering activities at a level commensurate with the impact of the taking on this listed species. This subspecies has a limited range in Thurston County.

Avoidance, Minimization and Mitigation Measures: To minimize adverse effects to the Yelm pocket gopher and its habitat caused by covered activities, the 232-acre Plan Area subject to development has been reduced by the Applicant to a 139-acre Permit Area. All grading, excavation, materials storage, construction, and development activities will be limited to the 139-acre Permit Area. Reducing the total area that will be disturbed effectively minimizes the overall impact to the Yelm pocket gopher and its habitat.

To mitigate the impacts of the taking that cannot be avoided, the Applicant proposes the following prior to initiating any ground-disturbing covered activities:

1. The Applicant proposes to mitigate for unavoidable impacts to the covered species and its habitat by purchasing four actual acres of mitigation credit from the USFWS-approved Leitner Prairie conservation site, which is occupied by Yelm pocket gophers.
2. The credits to be purchased at the Service-approved conservation area of Leitner Prairie are of a different service area than those of the Yelm pocket gophers found on St. Martin's University campus. Because Leitner Prairie is out of the Service Area, additional mitigation is needed (St. Martin's HCP 2021, p. 34). To meet this need, the Applicant will commit to maintain existing habitat conditions on 26-acres of occupied grassland in the Plan Area for the Yelm pocket gopher for the 20-year permit term. The Applicant will provide funding to implement ongoing management actions on the 26-acre occupied grassland, and document that such management actions have been implemented to date.

The proposed mitigation is in keeping with the principles outlined in the Service's *Mazama Pocket Gopher Conservation Strategy and Mitigation Guidance* (Service 2015, and Service 2017).

Monitoring and Reporting: An annual report describing conservation status and activities occurring at the conservation site and the project site will be provided to the USFWS. The annual report and associated monitoring reports will include:

1. Project site: Compliance monitoring at the project site includes providing documentation to USFWS confirming that the mitigation equivalent to four functional-acres were purchased. Documentation will also include a description of covered activities that result in habitat impacts, ongoing field maintenance, and any restoration activities that occur each year. Monitoring at the project site includes the tracking and documentation of covered activities that result in habitat impacts, ongoing field maintenance, and any restoration activities that occur each year. Documentation of these activities and the resulting tally of the functional acres impacted at the project site each year will be provided by the applicant in the Annual Report as detailed Appendix D of the St. Martins HCP (2021).
2. Conservation Site: Monitoring at the conservation site includes an annual evaluation of habitat conditions to ensure that performance standards for Covered Species' habitat have been met. In accordance with the Kaufman HCP (2016) which facilitated the creation of the Leitner Prairie mitigation site,

the Leitner Prairie Land Manager is responsible for vegetation management and monitoring each year to meet the terms and conditions of the ITP for Kaufman HCP. Survey methods are described further in the Kaufman HCP, Appendix C: Leitner Prairie Site Management Plan, Appendix 2: Survey Protocol (Kaufman HCP 2016). An annual report will be prepared on the management of Leitner Prairie that supports gopher occupancy. The annual report and associated monitoring reports will include:

- A description of covered activities and the date of conservation actions that have occurred since the last monitoring report was prepared.
- A description of current on-site conditions that are or may be adversely affecting the Yelm pocket gopher and its habitat, as well as any actions being undertaken or contemplated to address such conditions.
- An evaluation of how conservation goals and performance standards under the HCP are being met; what activities need to be taken to meet them in future years; or recommendations for revisions to goals and performance standards if changed circumstances have occurred.
- A description of conservation actions anticipated to be implemented prior to the next monitoring report submission.

II. Does the HCP fit the following Department of the Interior and Fish and Wildlife Service categorical-exclusion criteria?

Yes, for the reasons discussed below, we find that the proposed St. Martin's HCP meets all three criteria for a categorical exclusion determination.

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

Yes. The anticipated impacts of covered activities are expected to be minor or negligible to the population of the Yelm pocket gopher with implementation of the Applicant's proposed conservation program. The anticipated effects to the species resulting from construction activities and associated infrastructure within the 139-acre Permit Area would result in the permanent loss of four functional acres of fragmented Yelm pocket gopher habitat.

While the proposed action is likely to cause localized and adverse impacts to individuals of the Yelm pocket gopher, these impacts are expected to be fully offset through the purchase of mitigation credits that fund permanent management, monitoring, and adaptive management on four actual acres of occupied Yelm pocket gopher habitat at a USFWS-approved conservation site, and through the 20-year maintenance of 26-acres of grassland occupied by Yelm pocket gophers.

The proposed action is unlikely to result in a detectable negative demographic-level effect upon the Yelm pocket gopher. No other listed, proposed, or candidate species are likely to be affected

by the covered activities.

B. Are the effects of the HCP minor or negligible on all other components of the human environment, including environmental values and environmental resources (e.g. air quality, geology and soils, water quality and quantity, socio-economic, cultural resources, recreation, visual resources, environmental justice etc.), after implementation of the minimization and mitigation measures?

Yes. The construction and maintenance activities within the 139-acre Permit Area, offsetting mitigation from the USFWS-approved Leitner Prairie conservation site, and the maintenance of 26-acres of occupied grassland in the Plan Area are expected to have minor or negligible effects on the human environment, including all environmental values and resources. The Thurston County Comprehensive Plan and Critical Area Ordinances and Washington's Growth Management Act designate that future construction on the site will meet the development standard in accordance with current zoning for the parcel. Local permits would condition project implementation to prevent impacts on soil erosion, stormwater, water and air quality, and other locally-regulated resources. The redevelopment of the Permit Area is not expected to impact socio-economic resources, environmental justice, reduce housing opportunities, transportation, climate change, or cultural resources.

The proposed development would be implemented consistent with zoning and is mitigated both offsite and onsite for impacts to the species. The offsite mitigation will result in conservation benefits to the prairie ecosystem at the landscape scale because it is professionally managed by the Center for Natural Lands Management (CNLM) in perpetuity within the range the Yelm pocket gopher and other native species.

When the above development and conservation factors are considered in the context of foreseeable trends and planned actions, the proposed action is likely to have minor to negligible effects on the covered species because the potential actions considered here are anticipated to occur consistent with local zoning, strategic planning, local and federal permitting, and public review of the HCP, the Service has determined that the incremental impacts of this HCP, considered together with reasonably foreseeable environmental trends and planned actions in the area, would not result, over time, in significant effects to the human environment.

C. Would the incremental impacts of this HCP, considered together with the impacts of other past, present and reasonably foreseeable future actions (regardless of what agency or person undertakes such other actions) *not* result, over time, in cumulative effects to the human environment (the natural and physical environment) which would be considered significant?

Yes. The Applicant's proposal to construct and maintain University buildings and infrastructure in the 139-acre Permit Area represents a level of development to the property that is consistent with current county zoning for the area. The impacts of the HCP will not result in significant adverse effects.

For the foreseeable future, the Service anticipates processing ITP applications for an additional

two to three HCPs for single-landowner construction projects in occupied Yelm pocket gopher habitat, a few municipal road-improvement projects (with associated HCPs for non-federal projects or Section 7 consultations for federal projects), and a county-wide HCP, the Thurston County HCP. These projects, if approved, would also include permanent and temporary habitat impacts with commensurate levels of perpetually protected habitat minimize and mitigate the impact of the taking on the Yelm pocket gopher.

The Thurston County has developed a county-wide HCP for development in lands under County jurisdiction over a 30-year period. If the HCP is approved and the ITP is issued, the HCP would address impacts to the Yelm pocket gopher and other species from their construction, operation, and maintenance projects as well as impacts from development permits they issue (Thurston County Draft Habitat Conservation Plan, 2020). The countywide HCP, if approved, would likely result in the acquisition and management of habitat throughout Thurston County across the range of the Yelm pocket gopher and two other listed *Mazama* pocket gopher subspecies. The Service is also helping to fund the acquisition of several hundred acres of habitat occupied by listed *Mazama* pocket gopher subspecies in Thurston County. Assuming that the Thurston County HCP is not approved, individual development activities that are reasonably certain to take Yelm pocket gophers would be expected to be modified to avoided take, or would be expected to be minimized and mitigated through the development of a project specific HCP and associated ITP issuance. When the impacts of this project are considered together with these range-wide impacts and conservation efforts for Yelm pocket gopher habitat, the overall effect of this action to Yelm pocket gophers is not likely to be significant.

Because the potential actions considered here are anticipated to occur consistent with local zoning, strategic planning, local and federal permitting, and public review, the Service has determined that the incremental impacts of this HCP, considered together with other past, present, and reasonably foreseeable future projects, would not result, over time, in significant cumulative effects to the human environment.

III. Do any of the exceptions to categorical exclusions (extraordinary circumstances) listed in 43 CFR 46.215 apply to this HCP?

Would implementation of the HCP:

A. Have significant impacts on public health or safety?

No. Significant effects to human health or safety (including considerations such as air quality, water quality, and noise or sound effects) are not expected from the proposed Federal action of issuing the requested ITP or from the resulting construction and maintenance of buildings and infrastructure within the 139-acre proposed Permit Area. The local zoning regulations are designed with public safety as a primary consideration. The Applicant's parcel is being developed consistent with county zoning. The proposed construction, mitigation, and grassland maintenance in an area occupied by the covered species represents lower levels of impact to public health and safety considerations than currently anticipated by local development authorities for the same acreage in a residential area. The proposed project and associated impacts are typical of construction in Thurston County, and the covered activities will be

restricted to the designated 139-acre development site on the Applicant's property. The Applicant committed to implement the proposed project in compliance with all applicable Federal, State, and local laws, regulations, and ordinances, ensuring that public health and safety standards will be maintained.

B. Have significant impacts on such natural resources and unique geographic characteristics as: historic or cultural resources; park, recreation or refuge lands; wilderness areas; wild or scenic rivers; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990) or floodplains (EO 11988); national monuments; migratory birds, eagles, or other ecologically significant or critical areas?

No. The Service completed a review of the proposed ITP action under section 106 of the National Historic Preservation Act of 1966 to determine if any historic or cultural resources might be affected by issuance of the requested ITP or implementation of the associated HCP. A signed copy of the Regional Historic Preservation Officer's (RHPO) Section 106 determination that no historic or cultural resources would be affected is on file in the Service's Washington Fish and Wildlife Office.

No park, recreation or refuge lands, wilderness areas, wild or scenic rivers, or national natural landmarks occur within the HCP plan area or would be affected by the proposed ITP action. No prime or unique farmlands, national monuments, eagles, or other ecologically significant or critical areas occur in the HCP plan area or would be affected by the proposed ITP action. Therefore, none will be affected by issuance of the requested ITP.

The issuance of the requested ITP and resulting construction of up to six new buildings, athletic fields, associated parking lots, sidewalks, storm water facilities, other utilities, landscaping; replacement of existing buildings; and other ground-disturbing activities described in the HCP (Saint Martin's HCP 2021) within the 139-acre Permit Area are not expected to impact groundwater or wetlands, and no growth-inducing or other related impacts are expected to impact prime or unique farmlands.

C. Have highly controversial environmental effects (defined at 43 CFR 46.30) or involve unresolved conflicts concerning alternative uses of available resources [see NEPA section 102(2)(E)]?

No. No highly controversial environmental effects or unresolved conflicts concerning short- or long-term potential uses of natural resources are expected within the proposed plan area as a result of the proposed ITP action or from implementation of the HCP.

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

No. Highly uncertain and potentially significant environmental effects or unique or unknown environmental risks are not expected from the proposed Federal action of issuing the requested ITP or from implementation of the associated HCP due to the small scale of this action and for

the reasons discussed in subsections A-L of this section.

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

No. Precedents for future actions or decisions about future actions with potentially significant environmental effects are not expected to be established by the proposed Federal action of issuing the requested ITP for take incidental to implementation of the HCP for the reasons discussed in subsections A-L of this section.

F. Have a direct relationship to other actions with individually insignificant but cumulatively significant environmental effects?

No. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time. There is no known relationship of the proposed Federal action of issuing the requested ITP with other actions that have individually insignificant, but cumulatively significant, environmental effects.

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

No. Implementation of the HCP is not expected to have any adverse effects on properties listed or eligible for listing on the National Register of Historic Properties. The Service consulted with the RHPO and determined that no properties listed or eligible for listing on the National Register of Historic Places will be affected by the proposed Federal action. A copy of the RHPO's letter to that effect is on file in the Service's Washington Fish and Wildlife Office (Service 2021).

H. Have significant impacts on species listed, or proposed for listing as Endangered or Threatened Species under the ESA or have significant impacts on designated Critical Habitat for these species?

No. Implementation of the proposed HCP is not expected to have significant impacts to species listed or proposed for listing under the ESA or to any designated critical habitats.

Although limited incidental take of individual Yelm pocket gophers is anticipated, the anticipated impacts of covered activities on the Yelm pocket gopher are expected to be minor or negligible to the population of this subspecies with implementation of the Applicant's proposed conservation program. The anticipated adverse effects to this species are limited to the loss of four functional-acres of habitat resulting from HCP implementation in the 139-acre Permit Area. Impacts to Yelm pocket gopher will be fully offset by the conservation and management of four actual acres of occupied habitat for the species at the USFWS-approved Leitner Prairie conservation site, as well as habitat maintenance of 26-acres of occupied grassland onsite in the Plan Area. The proposed action under the HCP is keeping with the Service's *Mazama Pocket Gopher Conservation Strategy and Mitigation Guidance* (Service 2015) and is not expected to result in a detectable demographic-level effect on the Yelm pocket gopher.

The project site is not located within designated critical habitat for the Yelm pocket gopher or other listed species or within the known range of any other species listed or proposed for listing under the ESA. The impacts of covered activities are expected to be contained within the proposed permit area. Therefore, no impacts to designated critical habitat and to other listed or proposed species are expected.

I. Violate a Federal law, or a State, local, or tribal law or requirement imposed for the protection of the environment.

No. The proposed activities covered under an HCP must be otherwise lawful for the Service to issue the requested permit. The Applicant has committed that the project will comply with all applicable Federal, State, local, or tribal laws or requirements imposed for the protection of the environment, and the Service is not aware of any such law or requirement that would be violated by issuing the permit or by implementing the HCP.

J. Have a disproportionately high and adverse effect on low income or minority human populations (EO 12898).

No. Permanent residential, low income, or minority human populations are not found within the plan area for the proposed HCP. The redevelopment of the Permit Area is not expected to reduce housing opportunities, transportation, or other resources. Construction of up to six new buildings, athletic fields, associated parking lots, sidewalks, storm water facilities, other utilities, landscaping; replacement of existing buildings; and other ground-disturbing activities described in the HCP (St. Martin's HCP 2021) within the 139-acre Permit Area on privately-owned land, issuance of the requested ITP, and subsequent implementation of the HCP are not expected to have disproportionate adverse effects on any such human populations.

K. Limit access to and ceremonial use of Indian sacred sites on Federal lands by Indian religious practitioners or significantly adversely affect the physical integrity of such sacred sites (EO 13007).

No. Implementation of the proposed HCP will occur on land owned and controlled by the Applicant and will not limit access to or the ceremonial use of Indian sacred sites on Federal lands or affect the integrity of any such sites.

L. Contribute to the introduction, continued existence, or spread of noxious weeds or non- native invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of such species (Federal Noxious Weed Control Act and EO 13112).

No. Issuance of the requested ITP and implementation of the proposed HCP are not expected to contribute to the introduction, continued existence, or spread of noxious weeds or non-native invasive species known to occur in the plan area or facilitate actions that may promote the introduction, growth, or expansion of the range of such species.

ENVIRONMENTAL ACTION STATEMENT

Within the spirit and intent of the Council on Environmental Quality's regulation for implementing the National Environmental Policy Act and other statutes, orders, and policies that protect fish and wildlife resources, I have established the following administrative record.

Based on the information and analysis above, I determine that the proposed Incidental Take Permit for the St. Martin's Habitat Conservation Plan for the Yelm pocket gopher qualifies for a categorical exclusion as defined in 40 CFR 1508.1. Therefore, the Service's permit action for this Habitat Conservation Plan is categorically excluded from further NEPA review and documentation, as provided by 40 CFR 1507.3; 43 CFR 46.205; 43 CFR 46.215; 516 DM 3; 516 DM 8.5; and 550 FW 3.3C. A more extensive NEPA process is unwarranted, and no further NEPA documentation will be made.

Other supporting document(s): The St. Martin's Habitat Conservation Plan for the Yelm pocket gopher (Saint Martin's HCP 2021); and the Service's *Mazama Pocket Gopher Conservation Strategy and Mitigation Guidance* (Service 2015, Service 2017).

Signature Approval:

Brad Thompson, State Supervisor
Washington Fish and Wildlife Office
U. S. Fish and Wildlife Service

Date

Literature Cited

- Kaufman HCP. 2016. The Kaufman Habitat Conservation Plan for Taylor's Checkerspot Butterfly (*Euphydryas editha taylori*); Streaked horned lark (*Eremophila alpestris strigata*); and two subspecies of the Mazama Pocket Gopher (*Thomomys mazama pugetensis* and *Thomomys mazama yelmensis*); in Thurston County, Washington. Prepared by Linda Krippner of Krippner Consulting, LLC for Kaufman Holdings, Inc.; Kaufman Real Estate, LLC; and Liberty Leasing & Construction, Inc. January 2016. This document can be accessed at: https://esadocs.cci-dev.org/ESAdocs/conserv_agmt/thcp_1464.pdf
- Thurston County Draft Habitat Conservation Plan. July 23, 2020. Thurston County Resource Stewardship Department. (https://www.thurstoncountywa.gov/planning/planningdocuments/Thurston_County_HCP_DRAFT_2020_07_23.pdf)
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- Service. 2021. Section 106 of the National Historic Preservation Act (NHPA) for St. Martin's Abbey/University Campus HCP, Thurston County, Washington. Prepared by U.S. Fish and Wildlife Service, Regional Historic Preservation Officer. Prepared for Washington Fish and Wildlife Office, Lacey, Washington. 24 February 2021. 5 pp. On file at the USFWS Washington Fish and Wildlife Office, Lacey, Washington.
- Saint Martin's Abbey. 2021. The Saint Martin's Abbey/Saint Martin's University Campus Habitat Conservation Plan for the threatened Yelm subspecies of the Mazama pocket gopher (*Thomomys mazama yelmensis*) in Lacey, Washington. Prepared by Krippner Consulting, Anacortes, Washington. September 2021. 45 pp + 3 appendices