SCREENING FORM FOR LOW-EFFECT HCP DETERMINATIONS

I. Project Information

A. Project name: Low-Effect Habitat Conservation Plan for BAE Hollister Test Facility, San Benito County, California.

B. Covered species: San Joaquin kit fox (Vulpes macrotis mutica), federally endangered California red-legged frog (Rana draytonii) and California tiger salamander (Ambystoma californiense), federally threatened

C. Project size (in stream miles and acres):

The Plan Area totals approximately 1.18 acres within the BAE Hollister Test Facility. The BAE Hollister Test Facility is approximately 0.75 mile east of the city of Hollister in San Benito County, California. The BAE Hollister Test Facility lies within the Tres Pinos 7.5-minute U.S. Geological Survey topographic quadrangle and consists of four parcels identified by their assessor parcel numbers (APNs) (APNs 025-190-057, 025-190-058, 025-100-008, and 025-100-009). The BAE Hollister Test Facility is within the foothills of the Diablo Range, between Hollister Valley and Santa Ana Valley.

D. Brief project description including minimization and mitigation plans:

Purpose, Need, and Duration

BAE Systems Platforms and Services (BAE or Applicant) is seeking an incidental take permit under Section 10(a)(1)(B) of the Endangered Species Act of 1973, as amended (Act), for take of the federally threatened California red-legged frog and California tiger salamander, and endangered San Joaquin kit (collectively, Covered Species). The take would be incidental to the implementation of a soil and groundwater remediation project (Project) at the BAE Hollister Test Facility in San Benito County, California. The proposed term of the Section 10(a)(1)(B) permit is 5 years following the initiation of activities. The total area temporary impacts from the Project encompasses approximately 1.18 acres.

The purpose of the Project is to treat impacted soils and groundwater at the BAE Hollister Test Facility. When completed, the soil remediation project would reduce perchlorate and energetic concentrations in vadose-zone soils to levels that are below the Regional Water Quality Control Board revised risk-based concentrations for protection of human health and the environment, including protection of beneficial water uses. The Project has two primary components: 1) sampling and remediation of impacted soil, and 2) remediation of impacted groundwater. A third component will be the required staging areas and access routes to implement the primary project components.
Species Occupation and Baseline

California red-legged frogs are known to occur within and nearby the Plan Area. Four California red-legged frogs – two females, one male, and one juvenile – were observed within the Plan Area during winter 2015 surveys along the Santa Ana Creek corridor. No California red-legged frog eggs or tadpoles have been detected within the Plan Area. The Plan Area contains aquatic habitat, upland habitat for refuge and foraging, and dispersal habitat for the California red-legged frog. Past studies have documented approximately 40 juvenile California red-legged frogs to occur in upland and aquatic habitat within 1 mile of the Plan Area.

One record of California tiger salamanders occurs within the project area. Several potential breeding ponds were identified within dispersal distance from the Plan Area and suitable upland habitat is present throughout. A multi-year drought hindered adequate surveys and we have assumed that all areas of impact are occupied by the species.

The Plan Area is within dispersal habitat for the San Joaquin kit fox. There are no recent observations of San Joaquin kits foxes within the Plan Area. However, based on past observations, San Joaquin foxes have been reported as near the Santa Ana Creek and as close as one mile within the Plan Area. The Diablo Range foothills and surrounding grasslands east of Hollister likely provide suitable habitat for the San Joaquin kits foxes breeding, foraging, dispersing, and migrating to and from dens in the region.

Goals and Objectives for the Covered Species

Goal 1: Minimize take of California tiger salamanders, California red-legged frogs, and San Joaquin kit foxes that may be present in the permit area during project activities to the greatest extent possible.

Objective 1: Perform project activities during the dry season to minimize effects on dispersing California tiger salamanders and California red-legged frogs.

Objective 2: Survey suitable upland/refuge habitat prior to ground-disturbing activities (to be performed by a qualified biologist) to identify and avoid individuals.

Objective 3: Use exclusion fencing to control access to sensitive areas and prevent wildlife from entering the project area.

Goal 2: Minimize edge effects and habitat fragmentation, and adverse effects of project activities on upland habitats potentially used by the California tiger salamander and California red-legged frog, and on San Joaquin kit fox denning habitat within the permit area, to the greatest extent possible.

Objective 1: Preserve existing vegetation wherever feasible, utilize erosion and sediment control materials following the Hollister Test Facility’s industrial Storm...
Water Pollution Prevention Plan (SWPPP), and take measures to prevent the spread of invasive weeds.

Objective 2: Avoid disturbing potential California red-legged frog and California tiger salamander breeding habitat by excluding ponds and other water bodies from the project footprint and by creating a 100-foot buffer (or largest buffer possible, if 100 feet is not possible) between project activities and water bodies.

Objective 3: Restore the pre-project grade to disturbed areas and revegetate temporarily disturbed portions of the project site with a seed mix consisting of native grasses and forbs within 30 days of disturbance to minimize effects of project activities on upland habitat. Habitats at Arena 1 will be restored to original grade but will remain unvegetated, as required by the local fire department.

Goal 3: Protect habitat for the California tiger salamander and the California red-legged frog at an off-site location with high conservation value for both species.

Objective 1: In order to mitigate 1.18 acres of upland habitat that will be temporarily or permanently impacted by project activities, BAE will purchase credits equal to 2.42 acres of California tiger salamander and California red-legged frog upland habitat prior to the initiation of ground-disturbing activities. For more detailed information on the mitigation component of the Habitat Conservation Plan, refer to Section 5.3.3, Measures to Mitigate Unavoidable Impacts.

Project Description, Avoidance and Minimization, Mitigation

The Project activities requested for coverage under the Habitat Conservation Plan (HCP) includes the sampling and remediation of impacted soil, remediation of impacted groundwater, and development and use of staging areas and access routes.

Soil sampling and remediation would consists of approximately 20 soil borings that will be drilled using a pickup truck mounted drilling rig to further characterize the soils. A two-inch diameter hole will be cored into ground at each location to a depth of approximately 30 feet to facilitate the collection of soil samples. The borings will be backfilled using a Portland cement grout when complete. The soil remediation would include excavation, hauling, and on-site treatment and/or off-site disposal of impacted soils from the project area. Remedial work would be conducted in phases over a 3-year period, and no more than 1 acre would be disturbed in any given year. The remediation activities would occur during dry weather months to reduce the chance of impacted and disturbed soils coming in contact with storm water runoff. Soil excavation will occur at four locations at the BAE Hollister Test Facility.

Groundwater remediation would include remediation of groundwater that was impacted with perchlorate during past site activities. To remediate the groundwater, a mixture of lactate and extra virgin olive oil would be injected into the groundwater to stimulate naturally occurring bacteria that break down the perchlorate. Approximately 200 injection points would be
completed each year for approximately 5 years (for a total of 1,000 injection points). A truck-mounted direct-push injection rig (Geoprobe 8040) would be used to complete each injection point. The injection points would be approximately 2 inches in diameter and pushed to a maximum depth of approximately 50 feet, and would be located approximately 5 to 10 feet apart. A second support truck carrying the pump, mixing equipment, and injection formulation would have hoses connected to the probe. This support vehicle will be stationed on a nearby road or parking area during the drilling and injection operations. The injection material will be pumped from the support vehicle through hoses to the injection probe and into the ground. Drilling and injection activities will take approximately 1 to 2 hours at each location. Following the injections, each injection point hole will be filled to the ground surface with a Portland cement grout to keep the hole from collapsing. Each annual round of injections would take approximately 1 month to complete.

Staging of equipment will occur within the project footprint of the proposed remediation activities. Equipment will be staged at times in the Soil Treatment Area, Arena 1, Arena 2, Building 1 and Building 6 project locations. Equipment would be moved between sites using the existing access roads. Existing roads would be used to move and transport soil between project locations. The dirt access road to Arena 2 would be widened by up to 3 to 5 feet along a 100- to 200-foot length.

The HCP’s conservation strategy includes the following measures designed to avoid and minimize the proposed project’s impacts on the Covered Species:

- Before the start of ground-disturbing activities, the project Biologist or designee will prepare and implement an Environmental Awareness Training session for workers who will be conducting the environmental remediation activities at the project site. Training materials will include discussion of the following: Federal Endangered Species Act, the Migratory Bird Treaty Act, and the Clean Water Act. Consequences and penalties for violation or noncompliance with these laws and regulations and project permits. In the training, project timing in relation to species’ habitat and species’ life stage requirements will be detailed and discussed on project maps, which will show areas of planned minimization and avoidance measures.

- A fact sheet conveying this information will be prepared by the project Biologist or designee for distribution to the project workers and others who enter the project area. On completion of the training, project workers will sign a form stating that they attended the training, understand the information presented, and will comply with the training requirements. Workers will be informed during the training that, except when necessary as determined in consultation with the project Biologist, travel within the marked project site will be restricted to established roads. Established roads include all pre-existing and project-constructed unimproved and improved roads.

- The number and size of access routes and staging areas and the total area of the disturbance will be limited to the minimum necessary to achieve the project’s purpose and goals.
• Before work begins, the contractor will clearly delineate (e.g., stake, fence, or flag) the disturbance boundaries and prohibit any off-road traffic outside of these boundaries.

• The contractor will confine all equipment to designated work zones (including access roads and staging areas) within the project area.

• Vehicle equipment maintenance or fueling will occur in designated staging areas at least 100 feet from identified aquatic habitats. Prior to initiating any on-site work, the contractors for BAE will prepare a Hazardous Material Spill Prevention, Control, and Countermeasure Plan. This plan will minimize the potential for, and the effects of, spills of hazardous, toxic, or petroleum substances. BAE will review and approve the plan before ground-disturbing work begins.

• Project personnel will be instructed to exercise caution when commuting within special-status species habitats in the project area. A 15-mile-per-hour speed limit will be observed on all unpaved access roads within the project site.

• The contractor will provide closed garbage containers for the disposal of food-related trash items (e.g., wrappers, cans, bottles, food scraps). Garbage will be removed daily from the project area. Project personnel will not feed or otherwise attract wildlife to the project area.

• No pets will be allowed in the project area.

• The project workers shall not have firearms on the project site. This shall not apply to authorized security personnel, or local, State, or Federal law enforcement officials.

• To minimize disturbance of nocturnal and/or crepuscular wildlife, work will begin no sooner than 15 minutes after sunrise and will cease no later than 15 minutes before sunset, where feasible.

• All fencing, flagging, debris, trash, and materials from work areas and access roads will be removed following completion of project activities each season.

• Biodegradable erosion control measures will be used whenever possible. Synthetic erosion control material, including monofilament and plastics, will not be used.

• Exclusion fencing will be used to establish non-disturbance exclusion zones to restrict project equipment and personnel from sensitive areas or restrict state-listed wildlife species from entering the project areas. Sensitive areas will include habitats that may support state-listed species such as small mammal burrows and burrow complexes or active San Joaquin kit fox dens, and areas within buffers for state-listed species. The non-disturbance zones will be determined through consultation and permitting with the various natural resources regulatory agencies.
• Species-appropriate wildlife exclusion fencing will be installed along the outer perimeter of environmentally sensitive areas, buried at least 6 inches below-ground, to prevent intrusion below the fence line. Exclusion fencing will be inspected on a weekly basis for signs of tears, sagging, or other damage, and will be repaired immediately.

In addition to the general avoidance and minimization measures described above, measures for avoiding and minimizing effects on the California tiger salamander will include the following:

• A qualified biologist shall be on call and available by phone during all ground disturbing activities or vehicle travel not on existing roads or disturbed areas. The biologist(s) shall be granted the authority to stop any work that may result in the take of listed species. If the biologist(s) exercises this authority, the Service will be notified by telephone and electronic mail within one working day.

• Where feasible, project activities will be timed to occur during the dry season (nonbreeding season for the California tiger salamander) (April 15 through October 15) to minimize potential effects to salamander breeding and dispersal.

• Portions of the project area that are suitable refuge habitats for the California tiger salamander (i.e., grasslands and other natural habitats within 1.24 miles of potential breeding sites) will be surveyed prior to initiating ground-disturbing activities to identify burrows or other potential sites that might be occupied by this species. To the extent feasible, potentially occupied refugia burrows within the project area will be fenced and avoided for the duration of the activity at that location.

• Within 24 hours prior to initial ground-disturbing activities, portions of the project area where potential California tiger salamander habitat has been identified will be surveyed by a qualified biologist for salamanders to clear the site of salamanders moving aboveground, or taking refuge in burrow openings or under materials that could provide cover such as boards, scrap metal, woody debris, or other materials.

• A qualified biologist will be present during initial ground-disturbing activities to monitor the removal of the top 12 inches of topsoil at all project locations. If California tiger salamanders are discovered during the initial ground-disturbing activities, work will be stopped immediately and the biologist will contact the Service within one working day. The biologist in consultation with Service will use adaptive management to modify as necessary project activities to avoid or minimize impacts to listed species.

• If individual animals are observed, work at that location will be temporarily halted while the qualified biological monitor excavates the occupied burrow by hand, and the individual salamander is moved to a natural burrow within 0.25 mile of the construction site. The Service will be notified if California tiger salamanders are found and relocated. Any listed amphibian will be released at the mouth of a suitable burrow and then observed until it has safely entered the burrow.
In addition to the measures above, the following measures for avoiding and minimizing effects on the California tiger salamander during groundwater injection activities will be implemented:

- Within 24 hours prior to initial ground-disturbing activities, a qualified biologist will survey groundwater injection sites and potential access routes to identify burrows or other potential sites that might be occupied by this species. The qualified biologist will clearly identify and mark the most direct and least sensitive access route for a 6-foot-wide truck between the existing roadway and the groundwater injection site with nontoxic, high-visibility spray paint or flagging to maintain, where possible, a minimum buffer distance of 10 feet between burrow entrances and the access route.

- To the extent feasible, potentially occupied refugia burrows will be temporarily flagged and avoided. Where burrow avoidance is not feasible, or at locations where a vehicle will pass less than 10 feet from a burrow, plywood sheets of at least 0.5-inch thickness or greater will be placed on the ground to minimize the likelihood of collapsing subsurface burrows.

- A qualified biologist will be present prior to start-of-work to inspect the placement of plywood sheets, and during injection activities to escort vehicles along the access route. Although burrowing activity appears to be low at the groundwater injection site, the qualified biologist will be present to guide the movement and final placement of the truck-mounted drilling rig as it is staged for each individual injection location and will oversee a combination of burrow avoidance and the placement of plywood sheets where burrow avoidance is not feasible.

- Vehicle access to the groundwater injection site will be limited to the truck-mounted drilling rig. Contractor vehicles and secondary support vehicles will be prohibited from leaving the roadway; material injection will be accomplished through hoses, and will be performed from a secondary support vehicle staged on a nearby road or parking area. Personnel access to the identified access route and injection site will be limited to pedestrian access.

In addition to the general avoidance and minimization measures described above, measures for avoiding and minimizing effects on the California red-legged frog will include the following:

- A qualified biologist shall be on-call and available by phone during all ground-disturbing activities or vehicle travel that is not on existing roads or in disturbed areas. The biologist(s) shall be granted the authority to stop any work that may result in take of listed species. If the biologist(s) exercises this authority, the Service will be notified by telephone and electronic mail within one working day.

- Where feasible, project activities will be timed to occur during the dry season (nonbreeding season for California red-legged frog) (May through October) to minimize potential effects to frog breeding and dispersal.
• Portions of the project area that are suitable refuge habitats for California red-legged frogs (i.e., grasslands and other natural habitats within one mile of potential breeding sites) will be surveyed prior to initiating ground-disturbing activities to identify burrows or other potential sites that might be occupied by this species. To the extent feasible, potentially occupied refugia within the project area will be fenced and avoided for the duration of the activity at that location.

• Within 24 hours prior to initial ground-disturbing activities, portions of the project area where potential California red-legged frog habitat has been identified will be surveyed by a qualified biologist for frogs to clear the site of frogs moving aboveground, or taking refuge in burrow openings or under materials that could provide cover, such as boards, scrap metal, woody debris, or other materials.

• A qualified biologist will be present during initial ground-disturbing activities to monitor the removal of the top 12 inches of topsoil at all project locations. If California red-legged frogs are discovered during the initial ground-disturbing activities, work will be stopped immediately and the biologist will contact the Service within one working day. The biologist, in consultation with the Service, will use adaptive management to modify, as necessary, project activities to avoid or minimize impacts to listed species.

• If individual animals are observed, work at that location will be temporarily halted while the qualified biological monitor collects the individual by hand and moves it to suitable upland habitat within 0.25 mile. The Service will be notified if California red-legged frogs are found and relocated.

In addition to the measures above, the following measures for avoiding and minimizing effects on the California red-legged frog during groundwater injection activities will be implemented.

• Within 24 hours prior to initial ground-disturbing activities, a qualified biologist will survey groundwater injection sites and potential access routes to identify potential upland refugia sites that might be occupied by this species. The qualified biologist will clearly identify and mark the most direct and least sensitive access route for a 6-foot-wide truck between the existing roadway and the groundwater injection site with nontoxic, high-visibility spray paint or flagging to maintain, where possible, a minimum buffer distance of 10 feet between potential upland habitat and the access route.

• To the extent feasible, potentially occupied refugia burrows will be temporarily flagged and avoided. Where burrow avoidance is not feasible, or at locations where a vehicle will pass less than 10 feet from a burrow, plywood sheets of at least 0.5-inch thickness or greater will be placed on the ground to minimize the likelihood of collapsing subsurface burrows.

• A qualified biologist will be present prior to start-of-work to inspect the placement of plywood sheets, and during injection activities to escort vehicles along the access route.
Although burrowing activity appears to be low at the groundwater injection site, the qualified biologist will be present to guide the movement and final placement of the truck-mounted drilling rig as it is staged for each individual injection location and will oversee a combination of burrow avoidance and the placement of plywood sheets where burrow avoidance is not feasible.

- Vehicle access to the groundwater injection site will be limited to the pickup truck-mounted drilling rig. Contractor vehicles and secondary support vehicles will be prohibited from leaving the roadway; material injection will be accomplished through hoses, and will be performed from a secondary support vehicle staged on a nearby road or parking area. Personnel access to the identified access route and injection site will be limited to pedestrian access.

In addition to the general avoidance and minimization measures described above, the following measures for avoiding and minimizing effects on the San Joaquin kit fox will be implemented:

- A qualified biologist shall be on call and available by phone during all ground-disturbing activities or vehicle travel that is not on existing roads or in disturbed areas. The biologist(s) shall have the authority to stop any work that may result in the take of listed species. If the biologist(s) exercises this authority, the Service will be notified by telephone and electronic mail within one working day.

- To prevent inadvertent entrapment of San Joaquin kit foxes or other animals during the project, all excavated, steep-walled holes or trenches more than two feet deep shall be covered at the close of each working day by plywood or similar materials, or shall be provided with one or more escape ramps constructed of earth fill or wooden planks. Before such holes or trenches are filled, they shall be thoroughly inspected for trapped animals.

Measures to Compensate for Unavoidable Impacts

Implementation of the avoidance and minimization measures proposed above will substantially minimize the potential for disturbance of habitats potentially used by special-status species, substantially reduce the duration of habitat degradation, and prevent or substantially minimize direct injury or mortality of state-listed species within the project site during project activities. However, the proposed project will result in unavoidable temporary and permanent impacts to the California tiger salamander and the California red-legged frog. BAE will implement compensatory mitigation to address unavoidable temporary and permanent impacts to California tiger salamanders and California red-legged frogs. All habitats temporarily disturbed will be restored on site; except where required by the local fire department to remain unvegetated. In addition, off-site compensation will be provided for temporary and permanent impacts to the state-listed species assumed to be present.

BAE proposes to purchase California tiger salamander and California red-legged frog upland credits from a Service-approved mitigation bank prior to the initiation of ground disturbing
activities for this project. If credits (and receipt of credits) are not available at initiation of ground disturbing activities, an irrevocable letter of credit or a pledged savings account will be secured to provide Service-approved means of financial security pending identification of an acceptable mitigation bank. This security amount would be sufficient to purchase at least 2.42 acres for mitigation (taking into account current land values and inflation), and establish an endowment for annual management costs.

The applicant commits to fund all elements of the proposed conservation strategy, including compliance and effects monitoring. Monitoring results will be provided in reports to the Service.

II. Does the HCP fit the following low-effect criteria?

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 minimization and mitigation measures?

Yes. The effects of the proposed project on the Covered Species are minor and negligible. Effects from soil remediation activities at the BAE Hollister site are expected to be minimal in scale and duration.

Soil remediation activities are anticipated to have minor impacts on the biological function of the area and are not expected to affect species persistence or recovery.

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 minimization and mitigation measures?

Yes. We expect effects on other environmental values and resources from the soil remediation activities will be minor or negligible. Effects to water quality and quantity during the activities are not anticipated. The long-term effects of the soil remediation will have a positive effect on water quality. Effects of noise on the environment are expected to be minor and only occur during soil remediation activities. The proposed project is not anticipated to cause socio-economic impacts. Impacts to visual resources and cultural resources are not anticipated.

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 that would be considered significant?

Yes. Significant cumulative effects on the Covered Species are not anticipated to occur as a result of this HCP, or combined with the impacts of past, present, or reasonably foreseeable projects. Soil remediation activities at the BAE Test Facility would alter minimal habitat and most of the surrounding properties in the area is available for use by the Covered Species. We
anticipate that project implementation would not result in significant cumulative effects to environmental values or resources.

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

Would implementation of the HCP:

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

No. The HCP has been developed for the Covered Species in association with soil remediation activities at the BAE Hollister Test Facility.

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. The soil remediation activities at the BAE Hollister Test Facility would not have adverse effects to unique characteristics as historic of 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; floodplains; national monuments; migratory birds, or other ecologically significant or critical areas.

C. Have highly controversial environmental effects?

No. The project is consistent with zoning laws, ordinances, regulations, and policies. We do not anticipate any controversial environmental effects from the soil remediation.

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

No. We do not anticipate that this would result in uncertain effects or unknown risks. We anticipate soil remediation will have beneficial environmental effects once complete.

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

No. This HCP does not establish a precedent for future actions or represent a decision in principle about future actions that will potentially cause significant environmental effects.
F. Be directly related to other actions with individually insignificant but cumulatively significant environmental effects?

No. The proposed project is a single action not related to any other. We are not aware of any future actions directly related to the HCP; therefore, significant cumulative effects are not anticipated.

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

No. Compliance review has been completed for the project with a determination of no potential to cause effects on historic properties.

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

No. Critical habitat for any of the Covered Species does not occur in the project area and will not be affected.

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

No. The HCP supports the issuance of an incidental take permit that would authorize take of the Covered Species incidental to otherwise lawful activities. The HCP and incidental take permit issuance will fulfill Federal environmental compliance. This project has been subject to California Environmental Quality Act review pursuant to the County of San Benito County implementing guidelines and other Federal, State, and local environmental laws and requirements. Tribal land will not be affected.

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

No. Operations and maintenance of the BAE Hollister Test Facility will not affect low income or minority 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. Ceremonial or sacred sites do not occur on the proposed project site and will not be affected by implementation of the HCP.
IV. ENVIRONMENTAL ACTION STATEMENT

Based on the analysis above, the HCP for the proposed soil remediation activities at the BAE Hollister Test Facility qualifies for a categorical exclusion as defined in the U.S. Fish and Wildlife Service *Habitat Conservation Planning Handbook*. Therefore, this action is categorically excluded from further NEPA documentation as provided by 516 DM 2, Appendix 1; 516 DM 6, Appendix 1; and 516 DM 8.5 (C)(2).


Concurrence:

[Signature]

Stephen P. Henry
Field Supervisor

Date: 5/9/17