SCREENING FORM FOR LOW-EFFECT HCP DETERMINATIONS

I. Project Information

A. Project name: Low-Effect Habitat Conservation Plan (HCP) for the Endangered Smith's Blue Butterfly for Repair of Five Bridges, Point Sur State Historic Park, Monterey County, California

B. Affected species: Smith's blue butterfly (*Euphilotes enoptes smithi*), federally endangered

C. Project size (in stream miles and acres): The project involves the repair and reconstruction of five existing timber bridges located along the access roads to the Point Sur Light Station and Lighthouse at the Point Sur State Historic Park (PSSHP). The proposed bridge repair sites are located on steep side slopes of Moro Rock at Point Sur. Anticipated ground disturbance during construction and subsequent maintenance activities is 10,196 square feet.

D. Brief project description including minimization and mitigation plans:

Purpose, Need, and Duration

The Monterey District of the California Department of Parks and Recreation (CDPR), a State resource agency, is seeking an incidental take permit, under Section 10(a)(l)(B) of the Endangered Species Act of 1973, as amended, for take of the federally endangered Smith's Blue butterfly. The take would be incidental to the repair and reconstruction of five existing timber bridges located along the access roads to the Point Sur Light Station and Lighthouse at PSSHP. Permanent impacts are anticipated to occur to all life stages of the Smith's blue butterfly (eggs, larvae, pupae, adults) occurring within the 10,196-square-foot impact area during the aforementioned project activities. The permit term requested is 10 years.

Covered Lands

Impact areas cover a total of 10,196 square feet (0.2341 acre) of ground and vegetation disturbance. The restoration area for project mitigation would occur on 3.6 acres within the Natural Preserve subunit of PSSHP.

Total acreage for covered lands: 3.8341 acres.

Species Occupation and Baseline

Surveys for both the larval and adult life stages of the Smith's blue butterfly were performed at Point Sur State Historic Park on six separate occasions in July and August of 2002 by entomologist, Dr. Richard A. Arnold (Arnold 2014). Despite an intensive search effort, Smith's blue butterfly life stages were not observed. Windy and foggy weather conditions somewhat hindered surveys at Point Sur; however, Dr. Arnold has observed Smith's blue butterfly life stages in multiple locations within dispersal distance of Point Sur. The CDPR assumes Smith's blue butterfly is present at PSSHP.

Goals and Objectives for Smith's Blue Butterfly

Goal 1: Avoid and minimize, to the extent practical, take of the SBB within the project site.

Objective 1.1: Locate project work areas within existing developed roadways or immediately adjacent to them.

Objective 1.2: Minimize removal of plant taxa indigenous to the Big Sur coastal area that grow at the project site, including food plants of the SBB.

Objective 1.3: Revegetate the disturbed portions of work areas at the project site with plant taxa of the northern coastal bluff scrub plant community that are indigenous to the Big Sur coast.

Goal 2: Protect and restore habitat for the SBB in the Natural Preserve at PSSHP with high conservation value for the butterfly.

Objective 2.1: Protect 3.6 acres of northern foredune habitat at the PSSHP Natural Preserve with fencing to exclude cattle.

Objective 2.2: Remove ice plant (*Carpobrotus spp.*), European beach grass (*Ammophila arenaria*), and other invasive plants from the dunes mitigation site.

Objective 2.3: Propagate and outplant a minimum of 2,769 Seacliff buckwheat (*Eriogonum parvifolium*) plants (net of 1,938 plants or a 3:1 ratio of mitigation to impacted plants) at the dunes mitigation site along with other endemic dune plants to restore the habitat to benefit the SBB.

Objective 2.4: Manage and monitor the habitat restoration annually throughout the life of the permit.

Project Description, Avoidance and Minimization, Mitigation

The PSSHP is located at Point Sur in the west central portion of Monterey County, between Monterey and Big Sur, in central coastal California. The PSSHP consists of four parcels, which collectively include 72 acres. Most of the PSSHP is undeveloped land, located along the northern portion of the Big Sur coast. Surrounding properties are mostly ranches used for cattle grazing.

Project activities would include repair and reconstruction of five bridges, installation of erosion control and storm water improvements, periodic maintenance and repairs to the access roads, debris removal from existing roadside ditches, revegetation and monitoring activities in the areas at the bridge work sites, and habitat restoration and monitoring at the mitigation site.

One hundred forty one buckwheat plants, the host plant for the Smith's blue butterfly, may be impacted at the five bridge work sites and an additional 505 buckwheat plants could be impacted during future maintenance or repairs to the access roads and debris removal. The project is expected to have relatively small impacts to Smith's blue butterfly habitat at PSSHP, due to the small size and location of the impact area at the previously disturbed bridge and roadside locations. The impact area for this project is of marginal long-term conservation value. Based on these factors, this project is not expected to significantly impact the persistence of the Smith's blue butterfly population within or surrounding the impact area, nor the persistence of the Smith's blue butterfly throughout its range.

This HCP's conservation strategy includes the following measures designed to avoid and minimize the project's impacts on the Smith's blue butterfly:

1. Minimize impacts to the Smith's blue butterfly by locating the project work areas within existing developed roadways or immediately adjacent to them.

2. Minimize removal of plant taxa native to the Big Sur coastal area that grow at the project site, including food plants of the Smith's blue butterfly.

3. Revegetate the disturbed portions of the project's work sites with plant taxa of the northern coastal bluff scrub plant community that are native to the Big Sur coast.

The applicant will mitigate for the permanent loss of Smith's Blue butterfly habitat and impacts to its buckwheat food plants by outplanting 2,769 seacliff buckwheat plants (for a net 1,938 plants, expecting a 70 percent survival rate) in a 3.6-acre protected portion of the sand dunes at PSSHP, a mitigation ratio of 3 to 1. This mitigation site is part of a legally designated State Natural Reserve and has special land use restrictions that are in perpetuity. The mitigation site will be fenced, weeds removed, and the habitat restoration will be monitored regularly to ensure success criteria are achieved. Presence-absence surveys for the Smith's blue butterfly will be conducted periodically during the term of the incidental take permit to document when the Smith's blue butterfly recolonizes the mitigation site.

The CDPR will fund all other elements of the proposed conservation strategy. Upon completion of the project, a qualified biologist will conduct compliance monitoring to evaluate success toward the biological goals and objectives, and adherence to the proposed minimization measures. Biological effects monitoring will be used to quantify the impact of the project on individuals and habitat of the Smith's Blue butterfly. The CDPR will submit results of this monitoring to the U.S. Fish and Wildlife Service in a project report.

Monitoring

This project will include compliance, effects, and effectiveness monitoring. Compliance monitoring will track the CDPR's compliance with the requirements specified in the HCP and permit terms and conditions. Effects monitoring will track the impacts of the covered activities on the covered species. The biological monitor for this project will conduct compliance and

effects monitoring. All biological effectiveness monitoring, which tracks the progress of the conservation program in meeting the HCP's biological goals and objectives, will be conducted at the dunes mitigation site near the eastern base of Moro Rock.

Construction monitoring will occur throughout the construction and the other covered activities. A Service-approved biological monitor will be present during delineation of the impact areas with protective fencing, all vegetation removal and ground disturbing activities associated with the bridge repairs. Site inspections should also occur at weekly intervals throughout the remainder of all bridge repair work.

Effects monitoring will quantify the amount of incidental take at the end of the project. A Smith's blue butterfly survey will occur once the mitigation buckwheat plants mature and produce a sufficient number of flowerheads. It will consist of three 2-day site visits to the mitigation area and a nearby location known to support the Smith's blue butterfly by a Service-approved biologist.

II. Does the HCP fit the following low-effect criteria? *The answer must be "yes" to all three questions below for a positive determination. Each response should include 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 minimization and mitigation measures?

Yes. The effects of the proposed project on the Smith's blue butterfly are minor and negligible. This conclusion is based on the following:

1. The small size of habitat disturbance caused by the project: The project would disturb 10,196 square feet of Smith's blue butterfly habitat, and is unlikely to cause indirect effects due to implementation of minimization measures.

2. The degraded condition of habitat within the proposed work sites: The habitat that would be removed by the project has previously been degraded by the construction of the five bridges and the access roads and their associated ditches. Clearing of native vegetation, as well as cut and fill on steep slopes occurred to accommodate these structures, degrading habitat conditions.

3. Smith's blue butterfly density is likely low within the project work sites: The project would occur on Moro Rock, Point Sur, where buckwheat plants generally grow at lower densities and produce fewer flowerheads than comparable nearby locations in the Big Sur region known to support the Smith's blue butterfly. For this reason, the number of Smith's blue butterflies impacted by the project is likely low. The project is not expected to have a long-term negative impact on the Smith's blue butterfly population within the region.

Due to these and other factors, this low level of habitat loss is likely to have minor effects on the Smith's blue butterfly. The proposed mitigation that will restore foredune habitat would provide beneficial effects for the Smith's blue butterfly. The CDPR is dedicated to preserving and managing habitat at the mitigation site to benefit the Smith's blue butterfly.

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 the project will cause only minor or negligible effects on other environmental values and resources. Due to the small size of the project, effects on air quality are expected to be negligible. Effects on water quality and quantity are not anticipated. The project is not anticipated to cause socio-economic impacts. One of the purposes of the bridge repair project is to preserve the historic and cultural resources that occur within the park. Cultural resources are not expected to be negatively impacted as a result of the project or mitigation. The project would not negatively impact recreation, as public access to the park is controlled. The reconstructed bridges will be situated in the same locations of the existing bridges; therefore, no visual impacts are anticipated. The project would restore access by repairing the load carrying capacity of the timber bridges. The project restores access for emergency fire response vehicles to the lighthouse and light station. Only minor noise effects on the environment are expected as a result of constructing during the construction period.

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

Yes. Significant cumulative effects to the Smith's blue butterfly or other species native to the Big Sur coast are not anticipated to occur in the near future. Significant portions of lands along the Big Sur coast are State or Federal land. Development on private coastal parcels is limited by the California Coastal Act and Monterey County policies. Repair and reconstruction of the bridges at PSSHP would not induce further development in the region as they are part of the access roads to the lighthouse and light station and are on property owned and managed by CDPR. Based on these factors, the project will not have cumulative effects on the Smith's blue butterfly and other endangered species of this region.

III. Do any of the exceptions to categorical exclusions apply to this HCP? (form 516 DM 2, Appendix 2) *If the answer is "yes" to any of the questions below, the project cannot be categorically excluded from NEPA. Each "no" response should include an explanation.*

Would implementation of the HCP:

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

No. The project will be conducted following the California Building Code, and hazardous materials would not be used.

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; national natural landmarks; sole or principal drinking water aquifers; prime farmlands; wetlands (EO 11990); floodplains (EO 11988); national monuments; migratory birds, and other ecologically significant or critical areas?

No. The work area for this project is located at the PSSHP, in the Big Sur coastal region of Monterey County and does not support prime farmland, sole or principal aquifers, wetlands, or floodplains. The project would not impact wild and scenic rivers, refuge lands, wilderness areas, parks, or recreation. Although the project is located within a State Park, it is intended to repair existing, unsafe bridges that were constructed in the 1960s.

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

No. No significant or controversial environmental effects are anticipated.

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

No. Reconstruction of the five bridges will be confined to a very small portion of the PSSHP (10,196 square feet or 0.2341 acre of the 72-acre PSSHP). These activities will not have uncertain effects or unknown risks.

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. The HCP is not expected to affect any future actions.

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

No. We are not aware of any future actions directly related to the HCP; therefore, no significant cumulative effects are expected to occur.

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

No. The Point Sur Light Station is recognized in the National Register of Historic Places. Although the access roads where the bridge repairs will occur lead to the light station, the light station is not in the area of potential effect and will not be impacted by the proposed project.

H. Have significant impacts on species listed, or proposed to be listed, on the List of Endangered or Threatened Species or have significant impacts on designated Critical Habitat for these species? *Consider the degree or amount of take and the impact of the take on the species. Although take may occur under project implementation, it may be so minor as to result in negligible effects. The same concept applies when considering effects to critical habitat.*

This project would cause soil disturbance within 10,196 square feet of soils supporting buckwheat plants and presumably occupied by Smith's blue butterfly. The small area of habitat alteration is expected to have minor effects on the Smith's blue butterfly and its habitat. Critical habitat for Smith's blue butterfly has not been designated.

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

No. The HCP and incidental take permit issuance will fulfill Federal environmental compliance. State compliance has been addressed in the Initial Study/Mitigated Negative Declaration for the project (CDPR 2014). The PSSHP is not located within tribal land.

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

No. The project purpose is to repair five historic bridges on a State Historic Park and restore Smith's blue butterfly habitat as mitigation for incidental take. These activities 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 PSSHP and will not be affected by the proposed HCP.

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. Weed eradication and control is a component of the restoration and management of the site, as outlined in the HCP.

IV. ENVIRONMENTAL ACTION STATEMENT

Based on the analysis above, the low-effect HCP for the proposed bridge repair project at Point Sur State Historic Park by the California Department of Parks and Recreation 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).

Other supporting documents: Low-Effect Habitat Conservation Plan

Concurrence:

Field Supervisor

June 24, 2015
Date

REFERENCES

Arnold, R. A. 2014. Low-effect Habitat Conservation Plan for the Endangered Smith's Blue Butterfly for Repair of Five Bridges that Provide Access to the Light Station and Lighthouse at Point Sur State Historic Park in Monterey County, California. Agency Draft. February 2014.

[CDPR] California Department of Parks and Recreation. 2014. Light station and fog signal road bridges rehabilitation project, Point Sur State Historical Park, initial study/mitigated negative declaration draft. April 2, 2014.