

SCREENING FORM FOR LOW-EFFECT HCP DETERMINATIONS

I. Project Information

- A. Project Name:** City of Santa Cruz Graham Hill Water Treatment Plant, Santa Cruz County, California
- B. Affected Species:** The federally endangered Mount Hermon June beetle (*Polyphylla barbata*), Zayante Band Winged Grasshopper (*Trimerotropis infantilis*), and Ben Lomond spineflower (*Chorizanthe pungens* var. *hartwegiana*)
- C. Project size:** The total project area consists of the 12.71 acres of the Graham Hill Water Treatment Plant (Treatment Plant) property located at 715 Graham Hill Road, Santa Cruz, California. Over the life of the permit, the project has the potential to disturb up to 0.88 acre of Mount Hermon June beetle occupied habitat and up to 4.82 acres of suitable habitat for a total impact of 5.7 acres. The City is seeking coverage under the permit for all 5.7 acres although the actual impact is expected to be lower. No project-related impacts to Zayante band-winged grasshopper are anticipated; however, this species could be affected at the mitigation site in the future as a result of restoration activities. The Ben Lomond spineflower is similarly addressed by the Plan because restoration and management activities could affect the species at the mitigation site.

D. Brief Project Description including minimization and mitigation plans:

The City of Santa Cruz (City) Water Department (Water Department) is a municipal utility that is currently owned and operated by the City, located on the central coast of California where the San Lorenzo River flows into Monterey Bay at the northern end of the state's central coast hydrologic region. The Water Department provides water service to an area of approximately 30 square miles, including the entire City of Santa Cruz, adjoining unincorporated areas of Santa Cruz County, a small part of the City of Capitola, and coastal agricultural lands north of Santa Cruz. As part of the City's water system, the City operates the Treatment Plant. The Treatment Plant site contains habitat characteristics of the Zayante Sandhills, which support the Mount Hermon June beetle.

The proposed Graham Hill Water Treatment Plant Habitat Conservation Plan (HCP) details the City's strategy to avoid, minimize, and mitigate take of the Mount Hermon June beetle associated with the City's activities at the Treatment Plant, and to Zayante band-winged grasshopper at the mitigation site should the species occupy the site in the future as a result of restoration activities. The HCP also addresses potential impacts to Ben Lomond spineflower at the mitigation site and associated conservation measures. Potential impacts to Mount Hermon June beetle would come from the daily operations and maintenance of the existing facilities and new construction. These activities would include but not be limited to: inspection and monitoring of the

facilities; mulching around ponderosa pines; landscape management; weed management; native planting; maintenance of vehicle access through grading of access roads, parking areas, or staging areas for future construction; facility maintenance; and pipeline repair.

Purpose: The HCP is intended to provide the basis for issuance of a section 10(a)(1)(B) incidental take permit (ITP) to the City. Permit issuance is necessary to authorize the incidental take of the federally endangered Mount Hermon June beetle and Zayante band-winged grasshopper associated with the daily operations and maintenance of the existing facilities, new construction, and at the mitigation site should the Zayante band-winged grasshopper occupy the site as a result of restoration activities. The HCP would also provide conservation measures for the Ben Lomond spineflower for potential impacts at the mitigation site.

Need: Presence of Mount Hermon June beetle was confirmed at the Treatment Plant during surveys conducted in 2004 and 2008. These presence/absence surveys determined that a small population is present. Due to the presence of Mount Hermon June beetle, even in low numbers, activities associated with the operations, maintenance, and future construction at the Treatment Plant would result in unavoidable take of the species. At this time the Zayante band-winged grasshopper is not known to occur within the project area or at the Bonny Doon mitigation site; however, there is a possibility it could occur at Bonny Doon in the future.

Proposed Project: The proposed project involves operations and maintenance activities at the Treatment Plant including day-to-day operations necessary for the safe and efficient delivery of drinking water to the City of Santa Cruz and future construction due to changes in regulatory requirements, growing demands for water, or the updating and replacement of aging facilities. The HCP provides the basis for issuance of an ITP to authorize unavoidable take of Mount Hermon June beetle and Zayante band-winged grasshopper associated with otherwise legal activities. The project would result in impacts to up to 12.71 acres of the facility property which includes 5.7 acres of suitable habitat composed of both Zayante rock outcrop and Watsonville soils, and 5.7 acres of Zayante soils and Sandhills habitat at the City's Laguna Creek watershed property in Bonny Doon (Plan area).

Project Duration: The requested permit duration is 30 years.

Covered Lands: The permit would address the acreages described above. The Treatment Plant parcel (APN 060-141-05) is located within the Felton 7.5' U.S. Geological Survey (USGS) topographic quadrangle, in 37° 0'4.13"N 122° 1'58.80"W T11S R2W La Carbonera Rancho. The mitigation site is located at the City's Laguna Creek watershed property (APN 080-241-18) in Bonny Doon.

Species Occupation and Baseline: The portion of the Treatment Plant immediately south of the water tank to the paved service road currently supports a mixture of plant species native to the Zayante Sandhills as well as some nonnative plants. One adult

male Mount Hermon June beetle was observed on July 1, 2004. Additional presence-absence surveys were conducted in June and July of 2008 at 13 locations scattered throughout the entire Treatment Plant property. Four adult male Mount Hermon June beetles were observed. These findings indicate that a very small population of the Mount Hermon June beetle persists at the site, but is restricted to the extreme southern portion of the site.

Species Goals:

Minimization and Mitigation Measures: The following measures are designed to minimize the indirect effects of the covered activities on the Mount Hermon June beetle by reducing incidental take of individuals and the degradation of habitat at the water treatment plant.

Locate Project Activities On and Adjacent to Current Development

To the extent practical, the covered activities of this HCP that occur on the portion of the site characterized by Zayante sands will be located either within the footprint of the existing water treatment facilities (i.e., existing buildings, water tanks, service roads, pipelines, etc.) or immediately adjacent to the existing water treatment facilities.

Delineate Boundaries of the Impact Area

Temporary fencing and signs will be erected before any vegetation clearing, excavation, or grading activities occur to clearly delineate the boundaries of the project's impact area. Warning signs will be posted on the temporary fencing to alert workers not to proceed beyond the fence. All protective fencing will remain in place until the operation and maintenance or construction activities have been completed. Signs will include the following language:

"NOTICE: SENSITIVE HABITAT AREA. DO NOT ENTER."

Cover Exposed Soils

Adult male Mount Hermon June beetles actively search for breeding females during the evenings between about May 15 and August 15. During this period, both sexes burrow into duff and Zayante sandy soils during the daytime. If construction or other ground disturbing activities occur during any portion of the Mount Hermon June beetle flight season, all exposed Zayante soils within the impact area will be covered by tarps, plywood, erosion control fabric, or another suitable impervious material. Exposed soils will be covered between the hours of 7:00 p.m. and 7:00 a.m. daily. This will prevent adult males from burrowing into the exposed soils and subsequently being injured or killed by soil disturbance (i.e., digging, grading, covering, etc.).

Relocate Observed Life Stages of the Covered Species

During the pre-work training session, all personnel will be shown pictures of the Mount Hermon June beetle larval and adult life stages, and instructed to cease ground disturbing activities and call an entomologist qualified and permitted to handle and

translocate the endangered beetle should any be observed during the covered activities. If the life stage is buried, then it will be reburied outside of the impact area at the approximate depth at which it was unearthed. If an adult Mount Hermon June beetle is found on the soil surface, then it will be relocated and released outside of the impact area on the soil surface. This measure is intended to minimize take of the Mount Hermon June beetle by reducing the number of larvae and adults that could otherwise be injured or killed as a result of project-related activities.

Dust Control

Appropriate dust control measures, such as periodically wetting down of work areas, will be used as necessary during excavation or any soil disturbing activities in the impact area or any other covered activities that generate dust.

New Outdoor Lighting

Adult Mount Hermon June beetles are active at dusk and may be distracted by incandescent, mercury vapor, sodium, and black light sources, which can disrupt normal behaviors and breeding activities; therefore, any new outdoor lighting installed as part of this project will use bulbs certified to not attract nocturnal insects.

Landscaping Elements That Degrade Mount Hermon June beetle Habitat

Because Mount Hermon June beetle adults emerge from the soil to attract and search for mates; turf grass, dense ground covers such as ivy (*Hedera* spp.), weed matting, aggregate, and mulch, can degrade habitat conditions and will not be used by the City at the site. As described below, material for revegetation should use plants endemic to the Zayante Sandhills.

Establish Mitigation Site or Purchase Conservation Credits at the Zayante Sandhills Conservation Bank

As the primary strategy to mitigate for unavoidable impacts of their project, the City proposes to establish a mitigation site at the City-owned Bonny Doon property. As a secondary strategy, the City may purchase conservation credits at the Zayante Sandhills Conservation Bank. The City also proposes to revegetate any area of temporary habitat loss on Zayante sandy soils with plants native to the Zayante Sandhills. The next two sections describe these mitigation measures in more detail.

The proposed covered activities of this HCP would be authorized to impact a maximum of 5.7 acres of habitat that could potentially be used by the Mount Hermon June beetle. The covered activities could also permanently impact life stages of the Mount Hermon June beetle and temporarily remove their habitat if vegetation clearing and grading occurs. To mitigate temporary impacts, the City will compensate for any future impacts by permanently protecting Sandhills habitat occupied by the Mount Hermon June beetle at its Bonny Doon property. To ensure mitigation in advance for impacts related to City activities covered by the HCP, the City will protect and manage 17 acres at the Bonny Doon property in perpetuity. Of the 17 acres to be protected and managed in perpetuity, 5.7 acres will be credited

towards the HCP, while the remaining 11.3 acres may be used by the City to mitigate for impacts of future projects. Specific details regarding the mitigation measures can be found in the HCP. This level of mitigation will be commensurate with the level of impacts to Mount Hermon June beetle habitat at the Treatment Plant property. The Bonny Doon site contains higher quality habitat in comparison to the degraded habitat at the Treatment Plant; therefore, the conservation value of the mitigation site is greater than that of the Treatment Plant property. The City will ensure that conservation occurs in lock step with any impacts from covered activities by establishing the mitigation site in advance or by purchasing conservation credits sufficient to mitigate for a particular impact before carrying out the covered activity.

As a secondary strategy, the City may compensate for any future impacts to MHJB by purchasing, at a 1:1 ratio, conservation credits from the Ben Lomond Sandhills Preserve of the Zayante Sandhills Conservation Bank. This level of mitigation is commensurate with the level of impacts to MHJB habitat at the water treatment facility property because the habitat quality at the conservation bank is prime compared to the degraded habitat at the Water Department property; thus the conservation value of the bank habitat is much greater than that of the property. Should the City decide to purchase credits, it will ensure that conservation occurs in lock step with any impacts from covered activities by purchasing conservation credits sufficient to mitigate for a particular impact before carrying out the covered activity. The City will purchase conservation credits on an as-needed basis over the life of the HCP.

The Zayante Sandhills Conservation Bank was approved by the Service and the County of Santa Cruz to provide mitigation for impacts to the MHJB and other special-status plants and animals of the Zayante Sandhills from projects within the Felton USGS quad. The operator of the conservation bank, PCO, LLC, will be responsible for all species monitoring, habitat management, and other conservation related activities that occur at the Ben Lomond Sandhills Preserve.

Revegetate the Area of Temporary Habitat Loss with Native Sandhill Plants

Some areas at the Treatment Plant will be temporarily cleared of vegetation or graded, but will not support any new structures or other hardscape after a covered activity has been completed. After completion of such covered activities, the impact area(s) will be revegetated with plants native to the Zayante Sandhills. Suggested Sandhills plants include sticky monkeyflower (*Mimulus aurantiacus*), deer weed (*Lotus scoparius*), silver bush lupine (*Lupinus albifrons* var. *albifrons*), ponderosa pine (*Pinus ponderosa*), and coast live oak (*Quercus agrifolia*). Other Sandhills endemic plants may be appropriate depending upon the location of the impact area and soil conditions. These native plants will provide suitable habitat conditions for Mount Hermon June beetle that might eventually colonize the temporarily impacted portion of the project area. As previously noted, revegetated areas will not include any landscape elements that degrade habitat for the Mount Hermon June beetle.

Monitoring and Reporting:

Monitoring

Compliance monitoring by a qualified biologist will occur during all construction activities and operations and maintenance activities in suitable or occupied Mount Hermon June beetle habitat. The biologist will ensure that all project areas are clearly delineated and impacts are restricted to those areas, that exposed Zayante soils are properly covered at night between May 15 and August 15, and that observed life stages of the Mount Hermon June beetle are properly relocated. The qualified biologist will also be responsible for effects monitoring which will include the calculation of areas of habitat disturbance and the number, if any, of individual Mount Hermon June beetles relocated. All information gathered by the biologist will be included in the annual report to the U.S. Fish and Wildlife Service (Service). Annual monitoring of the habitat and Mount Hermon June beetle population at the mitigation site will also occur.

Reporting

Reporting will include an annual summary describing the quality and type (i.e., temporary versus permanent) of Mount Hermon June beetle habitat impacts, and will describe the type of mitigation utilized to offset the Mount Hermon June beetle impacts (i.e., the number of credits purchased from the Zayante Sandhills Conservation Bank). If the Bonny Doon site is utilized for mitigation, then the various monitoring activities completed during the prior year will be described as well as results of Mount Hermon June beetle monitoring. The annual report is due to the Service by March 15 of each year.

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 majority of unavoidable impacts are expected to result in minor loss of Mount Hermon June beetle habitat. It is estimated that covered activities may impact up to 5.7 acres of Mount Hermon June beetle habitat over the 30-year life of the Plan. This level of habitat removal is expected to have minor effects on Mount Hermon June beetle. No impacts to Zayante band-winged grasshopper are expected at the time of the permit. Negligible impacts to Zayante band-winged grasshopper are expected at the mitigation site in the future as a result of restoration activities, should the Zayante band-winged grasshopper repopulate the mitigation site.

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. Due to the small scale of the project and the current environmental values and resources on the property, the effects of the HCP would be considered minor.

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. Most impacts to Mount Hermon June beetle will be temporary and result in a small amount of vegetation disturbance (i.e., most projects result in impacts so minor that the impacts are measured in square feet), impacts to the Mount Hermon June beetle and other environmental resources are expected to be minor, both individually and cumulatively. No more than 5.7 acres of Mount Hermon June beetle habitat would be impacted over the 30-year life of the Plan. Because the Zayante band-winged grasshopper is not currently in the Plan Area, this applies to Zayante band-winged grasshopper as well.

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 proposed HCP is intended to benefit public health and safety by maintaining safe and efficient water treatment facilities. No impacts due to hazardous materials are expected.

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. Cultural resources will be avoided. No adverse effects are expected on park, recreation, or refuge lands, wilderness areas, or wild and scenic rivers. Covered activities are not located within an area that includes prime farmlands, or sole or principal aquifers. Impacts to ecologically significant areas within the Plan area are expected to be minor or negligible before implementation of the mitigation measures.

C. Have highly controversial environmental effects?

No. We have not identified any highly controversial effects associated with the proposed plan.

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

No. The operations and maintenance activities and new construction are considered routine.

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

No. The 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. Future similar actions will be evaluated on their own merits.

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

No. We are not aware of any other actions that are directly related to the HCP.

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

No. A search of the National Register of Historic Places (NRHP) revealed no NRHP properties within the Plan area.

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

No. The HCP is expected to have minor or negligible impacts to Mount Hermon June beetle and Zayante band-winged grasshopper. The HCP would not affect other listed or proposed species, or designated critical habitat.

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. Approval of the HCP will not have adverse effects on wetlands or floodplains. Covered activities are unrelated to water development and the Plan area does not contain wetland areas.

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

No. The proposed HCP is compliant with all applicable Federal, State, and local laws. The City's activities are consistent with Santa Cruz County's General Plan. The Plan area does not include Tribal land.

IV. ENVIRONMENTAL ACTION STATEMENT

Based on the analysis above, the Graham Hill Water Treatment Plant HCP qualifies as a “Low-Effect” HCP as defined in the Service’s *Habitat Conservation Planning Handbook*. Therefore, this action is categorically excluded from further NEPA documentation as provided by 516 DM 2, Appendix 1 and 516 DM 6, Appendix 1.

Other supporting documents: City of Santa Cruz Graham Hill Water Treatment Plant HCP

Concurrence:

Diane K Noda, Field Supervisor

Date