

RECLAMATION

Managing Water in the West

Reintroduction of Bay Checkerspot Butterfly to San Bruno Mountain

Environmental Assessment 18-11-MP



U.S. Department of the Interior
Bureau of Reclamation

March 2018

Mission Statements

The Department of the Interior protects and manages the Nation's natural resources and cultural heritage; provides scientific and other information about those resources; and honors its trust responsibilities or special commitments to American Indians, Alaska Natives, and affiliated island communities.

The mission of the Bureau of Reclamation is to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public.

List of Abbreviations and Acronyms

BCB	Bay Checkerspot Butterfly
Creekside	Creekside Center for Earth Observation
CVPCP	Central Valley Project Conservation Plan
EA	Environmental Assessment
HCP	Habitat Conservation Plan
ITA	Indian Trust Assets
Reclamation	Bureau of Reclamation
SBM	San Bruno Mountain
USFWS	U.S. Fish and Wildlife Service

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Section 1 Introduction

1.1 Background

In conformance with the National Environmental Policy Act of 1969, Council on Environmental Quality regulations (40 CFR 1500-1508), and Department of the Interior Regulations (43 CFR Part 46), the Bureau of Reclamation (Reclamation) prepared this Environmental Assessment to evaluate and disclose potential environmental impacts associated with providing \$202,384 to the Creekside Center for Earth Observation (Creekside) to reintroduce the Bay checkerspot butterfly (*Euphydryas editha bayensis*) (BCB) to San Bruno Mountain (SBM) in San Mateo County near the city of South San Francisco, California. The Central Valley Project Conservation Program (CVPCP) would provide funding for the Proposed Action.

Historically, the species occurred in the vicinity of the San Francisco Bay area from San Bruno Mountain (west of the Bay), Mount Diablo (east of the Bay), to Coyote Reservoir (south of the Bay) and even south to Hollister. The current range of the species is greatly reduced and is now restricted to serpentine grasslands or grasslands occurring on soil types containing similarities to serpentine. At the time the U.S. Fish and Wildlife Service (USFWS) published its Recovery Plan in 1998 for the BCB (USFWS 1998), there were two populations identified; one in San Mateo County (primarily at Edgewood Park) and the other scattered across southern Santa Clara County, predominately at Coyote Ridge. Butterfly numbers in San Mateo County decreased annually until it was presumed extirpated from San Mateo County in 2002 (USFWS 1998, Weiss 2002). The species was listed as threatened by the USFWS on September 18, 1987. The BCB collection and reintroduction sites of the Proposed Action are within designated critical habitat for the species.

The recovery plan for the Serpentine Soil Species of the San Francisco Bay Area (USFWS 1998) emphasizes the need to protect, restore, and manage habitats for BCB at SBM. The plan recommends reintroducing BCB at that location, which would be one of three satellite populations in San Mateo County needed to meet the requirements for de-listing the species (USFWS 1998: Recovery task 2.2.16). The San Bruno Mountain Habitat Conservation Plan (HCP) (SBM HCP Steering Committee 1982), guides BCB habitat management and species improvement actions at SBM. SBM is owned and managed by San Bruno Mountain State and County Parks which fully support the Proposed Action.

1.2 Need for the Proposal

Urban development associated with water deliveries from Reclamation's Central Valley Project (CVP) has contributed to the loss of habitat and reduced populations of the BCB (USFWS 2000). Heavy commercial and residential development pressure has reduced available suitable habitat for the species in Santa Clara County where most BCB reside. Population declines in the county

are associated with urban growth in and around the service area of the Santa Clara Valley Water District, a CVP contractor.

Currently there is one large core population of BCB located at Coyote Ridge in south San Jose/northern Morgan Hill in Santa Clara County. While the Coyote Ridge population is thought to be doing well, butterfly populations can fluctuate in both time and number. Stochastic events or climate change could have significant negative effects on populations. To protect against such an event occurring at Coyote Ridge that could put recovery of the species at risk, it is important to establish new BCB populations, or supplement existing populations elsewhere, within the historic range of the species. The Proposed Action would contribute toward such a goal. The Sacramento Fish and Wildlife Office of the USFWS supports the Proposed Action because it determined the effort to be essential for the recovery and eventual delisting of the BCB.

Section 2 Alternatives Including the Proposed Action

2.1 No Action Alternative

Reclamation would not provide \$202,384 from the CVPCP to Creekside to reintroduce the BCB to San Bruno Mountain. To accomplish the action, Creekside would have to obtain the funding from other public or private sources. If alternative funding cannot be secured, the Proposed Action could not move forward.

2.2 Proposed Action

Reclamation would provide \$202,384 to Creekside to reintroduce the BCB to SBM in San Mateo County. Creekside would collect up to 5,000 BCB larvae from source populations at Coyote Ridge. This collection site contains 7,000 acres of contiguous serpentine soil habitats supporting BCB. To prevent over-collection, no more than 5% of the BCB source population would be collected. Larvae would be transported to release sites in vented containers in coolers, and would be distributed by hand at two sites at San Bruno Mountain, as early as February 2018. Larval releases would be supplemented by collecting and releasing up to 60 adult BCBs (40 female, 20 male) from Coyote Ridge to SBM. While BCB is generally considered a “serpentine endemic” associated with areas of serpentine soil, they are also present in “tertiary” habitat types on soils not derived from serpentine, but which have similarities to serpentine-derived soils (USFWS 1998). SBM contains such a “tertiary” habitat type. The presence of BCB on a site is fully correlated with the presence of its “host” plant, species of plants within the genus *Plantago* (common name “plantain”), which is the sole plant upon which BCB larvae feed.

In 2013, the USFWS commissioned a feasibility study for BCB reintroduction at SBM (Niederer et al. 2015a). The study analyzed potential release sites based on factors including the presence of host plants, topographic heterogeneity, and wind protection. Based on information and analysis resulting from the study it was determined that the two most promising reintroduction sites at SBM are the Upper Buckeye and Lower Tank-Juncus sites. The sites are designated Essential Grasslands in the SBM HCP. Such a designation indicates that the sites’ superior habitat quality and the presence of other special status species covered by the HCP makes them a priority for ongoing habitat management efforts (Niederer et al. 2015a). Creekside would release BCB at both sites unless pre-release surveys indicate that one of the sites has too few host plants. Should that be the case, BCB would be released at the site supporting the greatest number of host plants. BCB releases would continue for four years to greater ensure the possibility of encountering good weather (mostly cool springs) in establishment years, which would improve the likelihood of success. Additional sites would be considered for release should rapid

assessment surveys, to be funded as part of the Proposed Action, identify additional sites with large stands of plantain.

Monitoring activities of the Proposed Action would consist of conducting BCB postdiapause larval estimates, walking transects to count adult BCBs, and sampling at vegetation phenology plots at San Bruno Mountain (as in Niederer and Weiss 2016; Niederer et al. 2015b).

Information gathered during the first two activities would be used to estimate BCB population and distribution. Information from the latter activity would be used to indicate the likelihood of success of BCB introductions the following year based on the amount and species diversity of vegetation in the plots, among other things.

Coyote Ridge: Recommended Bay Checkerspot Collection Sites



Figure 1. Coyote Ridge Collection sites for Bay Checkerspot Butterfly

San Bruno Mountain: Recommended Bay Checkerspot Reintroduction Sites

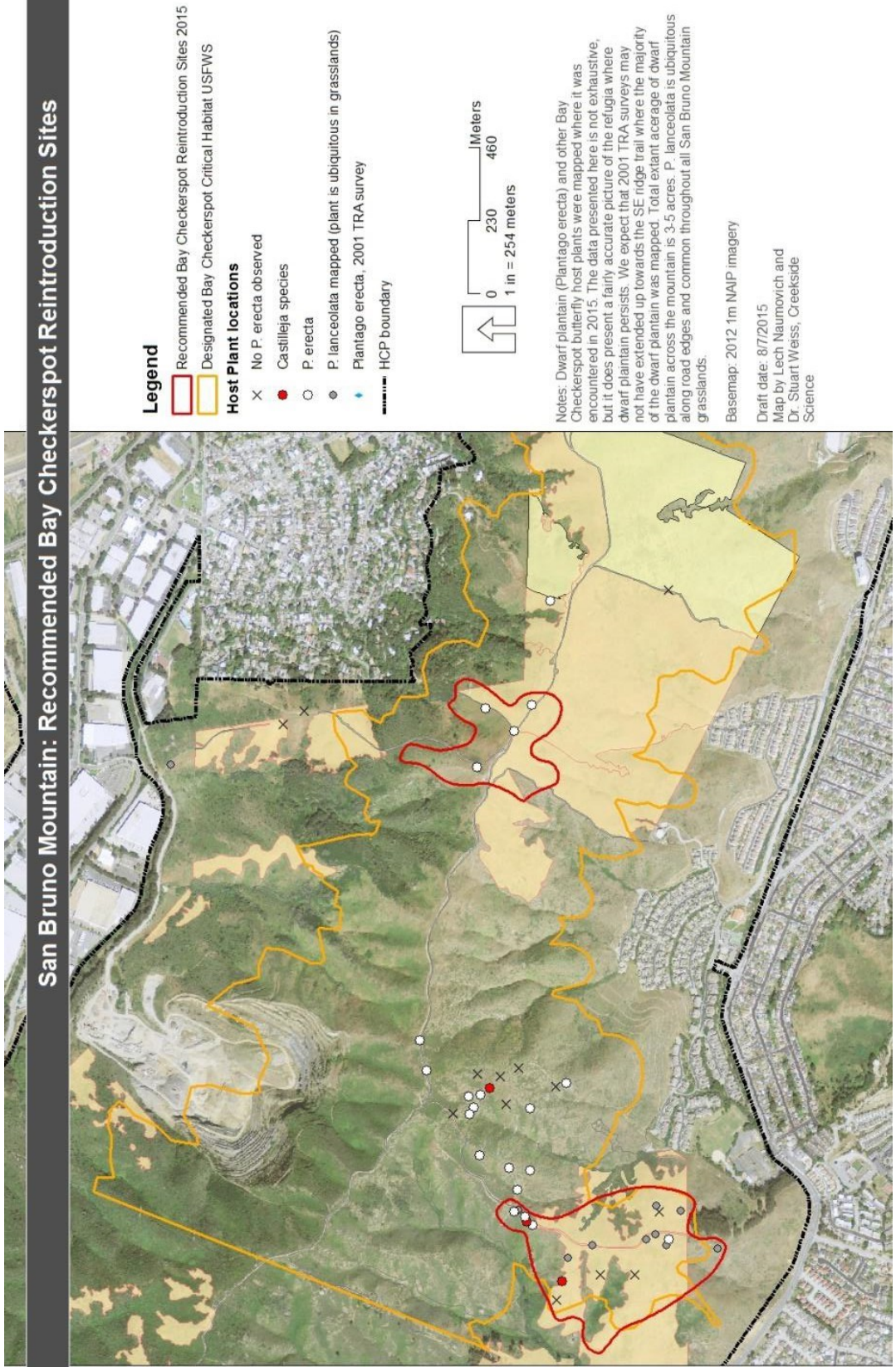


Figure 2. San Bruno Mountain Bay Checkerspot Butterfly Reintroduction Sites.

Section 3 Affected Environment and Environmental Consequences

3.1 Resources Not Analyzed in Detail

Department of the Interior Regulations, Executive Orders, and Reclamation guidelines require a discussion of the following items when preparing environmental documentation:

3.1.1 Cultural Resources

The Proposed Action is an undertaking as defined at 36 CFR § 800.16(y). Reclamation determined the undertaking has no potential to cause effects on historic properties, pursuant to 36 CFR § 800.3(a)(1), and, therefore, would result in no significant impacts to cultural resources. As such, Reclamation has no further obligations under 54 U.S.C. § 306108, commonly known as Section 106 of the National Historic Preservation Act. (See Appendix A).

3.1.2 Indian Trust Assets

Indian Trust Assets (ITAs) are legal interests in assets that are held in trust by the United States for federally recognized Indian tribes or individuals. There are no Indian reservations, rancherias or allotments in the project area. The closest ITA to the Proposed Action at Coyote Ridge is the 50H CA12519 ITA which is about 39.89 miles to the southeast. The closest ITA to the Proposed Action at San Bruno Mountain is the Lytton Rancheria which is about 19.10 miles to the northeast. Therefore, the Proposed Action does not have a potential to affect ITAs (See Appendix B).

3.1.3 Indian Sacred Sites

Executive Order 13007 (May 24, 1996) requires Federal agencies to protect and preserve Indian religious practices on Federal lands through accommodating access to and ceremonial use of Indian sacred sites by Indian religious practitioners and avoiding adversely affecting the physical integrity of such sacred sites. Executive Order 13007 is applicable to sacred sites identified by Federally-recognized Indian tribes on Federal land. The Proposed Action does not involve Federal land. As such, the Proposed Action would result in no impacts related to the access or use of Indian sacred sites.

3.1.4 Environmental Justice

Executive Order 12898 requires each Federal agency to identify and address disproportionately high and adverse human health or environmental effects, including social and economic effects of its program, policies, and activities on minority populations and low-income populations. Reclamation has not identified adverse human health or environmental effects on any population because of implementing the Proposed Action. Therefore, implementing the Proposed Action could not have a significant or disproportionately negative impact on low-income or minority individuals within the Proposed Action area.

3.2 Biological Resources

3.2.1 Affected Environment

The Bay checkerspot butterfly is a medium-sized butterfly with a wingspan of about 2 inches in the family Nymphalidae, the brush-footed butterflies. BCB forewings have black bands along the veins in the upper wing with bright red, yellow, and white spots. (See cover photo). Research and species surveys have demonstrated that habitat for BCB exists only on shallow, serpentine-derived soil (i.e., soils high in magnesium and heavy metals and low in nutrients such as nitrogen, phosphorus and calcium), or on soils with similarities to serpentine-derived soils, that support the butterfly's larval food plants and nectar sources for adults. Historically, the primary host plant on which female BCB lay their eggs, and upon which larvae hatch and feed, was dwarf plantain (*Plantago erecta*). However, *P. erecta* is diminutive in stature and has been found to compete poorly against invasive nonnative plants. As a result, in areas where BCB populations remain, the presence of *P. erecta* has mostly diminished to small patches, and BCB have begun to use the non-native *Plantago lanceolata* instead. Creekside staff have found *P. lanceolata* to be the primary host plant for BCB at San Bruno Mountain and elsewhere within the species' range where it is present.

In spring (usually March-April), females lay masses of 20-350 eggs on or near plantain. Eggs hatch in about two weeks, and emerging larvae feed on the plants upon which they hatch. Larvae require a second host plant on which to feed when the plantain dries up. Under those conditions, larvae have generally been found to move to purple owl's clover (*Castilleja densiflora*), exserted paintbrush (*Castilleja exserta*), or other plants which remain edible later in the season. Adults feed on the nectar of a variety of flowering plants including desert parsley (*Lomatium* spp.), California goldfields (*Lasthenia californica*) and tidy-tips (*Layia platyglossa*) (USFWS 1998).

Historically, BCB occurred primarily on hills and ridges of the San Francisco Peninsula, from Twin Peaks to southern Santa Clara County and in a few pockets in Alameda and Contra Costa counties. Species experts employed by Creekside believe that a combination of drought, low population numbers, extensive fire, and domination of the plant community by annual grasses and other nonnative plants were the primary cause of extirpation of most of the historical BCB populations in the mid-1980s.

The California Natural Diversity Database (CNDDDB) was queried to identify sensitive species and habitats recorded in the vicinity of both SBM and Coyote Ridge. Numerous special status species were identified in the query which could potentially occur in the area of the Proposed Action. Reported grassland-associated special-status species that could occur in the area of the Proposed Action include San Joaquin kit fox (*Vulpes macrotis mutica*), American badger (*Taxidea taxus*), burrowing owl (*Athene cunicularia*), San Francisco garter snake (*Thamnophis sirtalis tetrataena*), California red-legged frog (*Rana draytonii*), foothill yellow-legged frog (*Rana boylei*), California tiger salamander (*Ambystoma californiense*), Bay checkerspot butterfly, mission blue butterfly (*Icaricia icarioides missionensis*), San Bruno elfin butterfly (*Callophrys mossii bayensis*), callippe silverspot butterfly (*Speyeria callippe callippe*), Opler's longhorn moth (*Adela oplerella*), obscure bumblebee (*Bombus caliginosis*), western bumblebee (*Bombus occidentalis*), fragrant fritillary (*Fritillaria liliaceae*), Santa Clara Valley dudleya (*Dudleya abramsii* ssp. *setchellii*), Tiburon paintbrush (*Castilleja affinis* var. *neglecta*), San Francisco owl's clover (*Triphysaria floribunda*), bent-flowered fiddleneck (*Amsinckia lunaris*), Franciscan onion (*Allium peninsulare* var. *franciscanum*), and San Francisco collinsia (*Collinsia multicolor*).

3.2.2 Environmental Consequences

Establishment of BCB at SBM would enhance the long-term survival and recovery of BCB by increasing the number of viable populations and thereby decreasing the risk of species extinction and improving the likelihood of species recovery and de-listing. Also, the presence of the species at SBM could provide cause for San Bruno Mountain State and County Parks to give greater priority to actions benefiting the species when making decisions on how to manage habitats at SBM. Public use at San Bruno Mountain State and County Parks is not expected to be affected by the Proposed Action. According to the San Bruno Mountain State and County Park Master Plan (San Mateo County DPR 2001), it is the intention of San Bruno Mountain State and County Parks to manage the Parks as an open space preserve, with the particular goal of maintaining and enhancing its value as habitat for endangered species. According to the Plan, all efforts shall be made to encourage and protect rare and endangered butterfly populations on San Bruno Mountain, and areas of potential habitat could be considered for enhancement efforts. Given the focus of the Master Plan and the HCP on conserving endangered species, the Proposed Action is compatible with the intent of the Master Plan.

According to the SBM Master Plan, impacts from development and human use shall be minimized in areas of known rare and endangered species, and trails and other areas of human circulation shall be routed so they minimize intrusion into areas supporting endangered species. Recreational uses and access for walking/hiking, jogging, sightseeing, nature studies, bicycling, horseback riding, and picnicking would be permitted to the extent the activity is compatible with the preservation of park resources. Such activities are limited to the existing network of trails and developed public use and access sites. The BCB release sites where the Proposed Action would be conducted are located in the southeastern section of the Parks where public access is not authorized. Therefore the project would not lead to less public access or other adverse social effects at SBM.

Creekside staff who would participate in the Proposed Action have obtained valid Federal Recovery Permits for the proposed activities under Section 10(a)(1)(a) of the Endangered

Species Act, 16 U.S.C. §1531 *et seq.*, from the USFWS (Appendix C). The Proposed Action would be in accordance with those permits. Therefore, the Proposed Action would have no additional adverse effects or exceed take from what was previously authorized by the Federal Recovery Permits. Consequently, the Proposed Action would not adversely affect any federally listed species beyond what was detailed and evaluated in the issuance of the Federal Recovery Permits. (See Appendix D). Creekside staff also have obtained State permits needed to conduct the work including a California Scientific Collecting Permit.

CNDDDB queries of USGS quadrangles containing the collection and release sites contained occurrences of a number of sensitive species that could be present at the sites. However, potential impacts to species are limited to those which inhabit grassland habitats where all project work would take place. To analyze potential impacts from the Proposed Action to sensitive species, species with the potential to occur in the area of the Proposed Action were placed into one of 3 impact categories and evaluated as a group. Note that impacts would be limited to those that could occur from Creekside staff walking through the grasslands during collecting (at Coyote Ridge) and distributing (at San Bruno Mountain) larval and adult BCB, and from vehicles driven slowly on frequently used, compacted, and sparsely vegetated earthen roads to the vicinity of BCB collection and distribution sites. Potential impact categories are as follows:

1. Federally listed species for which impacts (“take”) has been authorized under USFWS Endangered Species Act permits. Species include the San Joaquin kit fox, San Francisco garter snake, California red-legged frog, California tiger salamander, Bay checkerspot butterfly, mission blue butterfly, San Bruno elfin butterfly, callippe silverspot butterfly, Santa Clara Valley dudleya, and Tiburon paintbrush. The Proposed Action is not expected to affect any species that has not already been authorized through the permit. The USFWS permit issued to Creekside for the Proposed Action was specific to the Bay checkerspot butterfly. Indirect effects that may occur to other listed species are covered in the permit as follows (from the language of the permit):

This permit does not authorize take of federally listed species that are not specifically authorized pursuant to this permit. However, the Service acknowledges that incidental take of a co-occurring federally listed species could potentially occur while conducting certain permitted activities. When applicable, the following conditions apply to all federally listed animals that the permittee is not authorized to take pursuant to this permit, but which may be incidentally sighted, encountered, captured, injured, or killed:

a. Each individual authorized pursuant to this permit shall be knowledgeable about potentially co-occurring listed species that may occur throughout the habitats in which permitted activities are conducted and must be observant and cautious to the extent that “take” of a co-occurring listed species is minimized to the maximum extent practicable.

b. Any federally listed animal that the permittee is not authorized to take pursuant to this permit, but is incidentally captured during the course of conducting authorized activities, shall be released immediately at the point of capture.

c. During the course of your permitted activities, if an incidental injury or mortality occurs to a federally listed species not authorized in this permit, the permittee shall follow all instructions specified in condition 12 below.

d. Any incidental capture, injury or mortality of a federally listed species not authorized in this permit shall be recorded and reported in the annual report submitted pursuant to this permit.

e. We request that all incidental encounters and/or sightings of other federally listed species not authorized under this permit be recorded and reported in the annual report submitted pursuant to this permit and also reported to the California Natural Diversity Database (CNDDDB) as specified in condition numbers 15 below.

2. Unlisted species that are mobile and not likely to be significantly affected. Species include American badger, burrowing owl, Opler's longhorn moth, obscure bumblebee, and western bumblebee. Because these species are highly mobile, and because Creekside workers would be walking slowly and cautiously to collect and distribute BCB larvae and adults, individuals of these species present in the work area would be able to vacate quickly when workers approach. Of the vertebrate species, Creekside workers would be on the lookout for the species and would act to avoid them while working. The insects are dayflying species which, while less likely to be aware-of and to avoid Creekside workers than would vertebrate species, they would be able to vacate the area unaffected should workers come within close proximity. For Opler's longhorn moth, larvae develop in a cocoon on the ground. Should work take place during the moth's larval stage, workers could step on larvae in the process of collecting or distributing BCB. Because there would be only 2 to 4 Creekside workers doing the collection and distribution activities, and because the activities would take place over a limited time period, it is not likely that a worker would step on a larvae of this rare species. However, should that occur it is not expected to have a significant impact on the population of the species overall.

Individuals of the vertebrate species that may be present on roads when slowly moving vehicles approach should be able to vacate the road without harm, and workers driving the vehicles would be on the lookout for the species and would act to avoid them. Therefore the use of vehicles is not expected to affect those species. In the case of sensitive insect species, because few or no sought-after plant species or other desired habitat features are expected to be growing on the compacted and sparsely vegetated road, the insects are not expected to be present on the road when vehicles approach. In consideration of the above, the Proposed Action is not expected to significantly affect any special status species in this impact category.

3. Unlisted special status plant species. Species include fragrant fritillary, San Francisco owl's clover, bent-flowered fiddleneck, Franciscan onion, and San Francisco collinsia. Potential impacts to the species are from Creekside workers stepping on one or more plants, and by slowly moving vehicles travelling on compacted and sparsely vegetated roads. Because there would only be from 2 to 4 Creekside workers doing the BCB collection and distribution activities, and because the activities would take place during a limited time period, it is unlikely that a worker would step on one of these rare plants. Should that occur, it is not likely that stepping on one or more of the plants would have a significant impact on the population of the species overall. None of the plants are likely to be growing in the compacted and sparsely vegetated road, so no significant effects on the plants are expected from vehicles travelling to and from the vicinity of the BCB collection and distribution sites. In consideration of the above, the Proposed Action is not

expected to significantly affect populations of unlisted special status plants in this impact category.

Based on the above evaluation, it has been determined that the Proposed Action would not affect any listed or other special status species.

Section 4 Consultation and Coordination

4.1 Agencies and Persons consulted during preparation of the EA

Reclamation consulted with the Creekside Center for Earth Observation and USFWS in the process of developing this EA.

4.2 Central Valley Project Conservation Program Technical Team

CVPCP managers are guided by a Technical Team of biologists and natural resource specialists from Reclamation, USFWS, and the California Department of Fish and Wildlife. The purpose of the Team is to implement a collaborative and integrated multi-agency process to coordinate actions under State and Federal laws to aid in recovery of CVP-impacted listed species. The Team helps insure the program is operated consistent with USFWS biological opinions (USFWS 2000) that guide implementation of the CVPCP and the jointly administered Central Valley Project Improvement Act Habitat Restoration Program (HRP) to mitigate for past impacts to species from the CVP. The Team provides guidance and recommendations to CVPCP and HRP managers regarding the projects to be funded each year among those proposed. During the period of October 3, 2016 through January 9, 2017, members of the Technical Team reviewed and scored proposals submitted to Reclamation for consideration for funding. Creekside's proposal for reintroduction of Bay checkerspot butterfly to SBM ranked in the top tier of proposals and was recommended for funding following evaluation by the Team. Reclamation and USFWS management subsequently approved the Technical Team's recommendation that the Proposed Action be funded.

4.3 ESA Consultation

No consultation is required because all adverse effects to federally listed species are accounted for in the Incidental Take Statement of the applicant's Federal Recovery Permits as described in Section 3.2.2. Since take, as prohibited under Section 9 of the ESA, has been exempted through the Section 10 permit, and no additional take would occur, no other consultation is required by Reclamation under Section 7 of the ESA.

Section 5 References

California Natural Diversity Database. January 2017 data.

Niederer, C. and S.B. Weiss. 2016. Bay checkerspot reintroduction: Coyote Ridge to Edgewood Natural Preserve. Prepared for the U.S. Fish and Wildlife Service.

Niederer, C., L. Naumovich, and S. B. Weiss. 2015a. Bay Checkerspot Butterfly Reintroduction Feasibility Study at San Bruno Mountain. Prepared for U.S. Fish and Wildlife Service.

Niederer, C., S.B. Weiss, and J. Quenelle. 2015b. Bay checkerspot reintroduction: Coyote Ridge to Tulare Hill. Prepared for the U.S. Fish and Wildlife Service.

San Bruno Mountain Habitat Conservation Plan Steering Committee. 1982. San Bruno Mountain Area Habitat Conservation Plan. Final. November 1982.

San Mateo County Division of Parks and Recreation. 1982. San Bruno Mountain Park Master Plan. State of California Department of Parks and Recreation. Prepared by Inouye/Dillingham Landscape Architects, Berkeley, California. Draft update 2001.

U.S. Fish and Wildlife Service, 1998. Recovery Plan for Serpentine Soil Species of the San Francisco Bay Area.

U.S. Fish and Wildlife Service, 2000. Biological Opinion on Implementation of the CVPIA and Continued Operation and Maintenance of the CVP. Sacramento Fish and Wildlife Office, Endangered Species Division. November 2000.

Weiss, S.B. 2002. Final Report on NFWF Grant for Habitat Restoration at Edgewood Natural Preserve, San Mateo County, CA Available online at:
http://www.co.sanmateo.ca.us/vgn/images/portal/cit_609/14232740Edgewood-NFWFFinalReport.pdf

Weiss, Stuart B. Personal observation.

Appendix A Cultural Resources Compliance

CULTURAL RESOURCES COMPLIANCE
Division of Environmental Affairs
Cultural Resources Branch (MP-153)

MP-153 Tracking Number: 17-SCAO-116

Project Name: Grant for Reintroduction of Bay Checkerspot Butterfly (BCB) to San Bruno Mountain

NEPA Document: EA

NEPA Contact: Doug Kleinsmith, Natural Resources Specialist; Dan Strait, Central Valley Project Conservation Program Manager

MP-153 Cultural Resources Reviewer: BranDee Bruce, Architectural Historian

Date: March 28, 2017

Reclamation proposes to award a grant to fund a program to capture, transfer, and reintroduce the BCB to San Bruno Mountain. Activities to be covered in the grant include obtaining permits and conducting project planning with regulators and landowners; conducting collection and transfer of the larval and adult BCB from Coyote Ridge to San Bruno Mountain; and a series of collection and monitoring programs and courses in host plant phenology and larval and adult BCB at San Bruno Mountain and Coyote Ridge; and data analysis of information collected. No ground disturbance is associated with this project and no construction or modification of facilities are need to accomplish this project.

Reclamation has determined that the proposed action is the type of activity that does not have the potential to cause effects on historic properties pursuant to 36 CFR § 800.3(a)(1). As such, Reclamation has no further obligations under Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108). Based on analysis of the project activities, the proposed action would have no significant impacts on properties listed, or eligible for listing on the National Register of Historic Places.

This document conveys the completion of the cultural resources review and Section 106 process for this undertaking. Please retain a copy with the administrative record for this action. Should the proposed action change, additional review under Section 106, possibly including consultation with the State Historic Preservation Officer, may be required.

Appendix B Indian Trust Assets Compliance

10/22/2015

**Indian Trust Assets
Request Form (MP Region)**

Submit your request to your office's ITA designee or to MP-400, attention Kevin Clancy.

Date:

Requested by (office/program)	Doug Kleinsmith
Fund	17XR0680A1
WBS	RY30180006BVWCA1E
Fund Cost Center	15XR0680A1
Region # (if other than MP)	
Project Name	Reintroduction of Bay Checkerspot Butterfly (<i>Euphydryas editha bayensis</i>) To San Bruno Mountain
CEC or EA Number	
Project Description (attach additional sheets if needed and include photos if appropriate)	<p>The Bureau of Reclamation proposes to provide \$202,384 to the Creekside Center for Earth Observation to reintroduce the Bay Checkerspot Butterfly from Coyote Ridge to San Bruno Mountain, California.</p> <p>Creekside would collect up to 5000 larvae from source populations in Coyote Ridge To prevent over-collection, no more than 5% of the local source population be collected. Larvae will be transported in vented containers in coolers, and distributed by hand throughout the habitat at San Bruno Mountain, likely in February. Up to 60 adult supplements (40 female, 20 male) will also be used.</p> <p>Translocations will continue for four years, to greater ensure the possibility of encountering good weather establishment years (mostly cool springs).</p>

10/22/2015

*Project Location (Township, Range, Section, e.g., T12 R5E S10, or Lat/Long cords, DD-MM-SS or decimal degrees). Include map(s)	See maps below Coyote Ridge: Lat: -121.72 -Long: 37.21 San Bruno Mountain: Lat: - 122.43 Long: 37.69
--	--

/s/ Doug Kleinsmith
Signature

Doug Kleinsmith
Printed name of preparer

10/23/17
Date

ITA Determination:

The closest ITA to the Proposed Action at Coyote Ridge is the 50H CA12519 ITA which is about 39.89 miles to the southeast. (See attached image). The closest ITA to the Proposed Action at San Bruno Mountain is the Lytton Rancheria which is about 19.10 miles to the northeast. (See attached image).

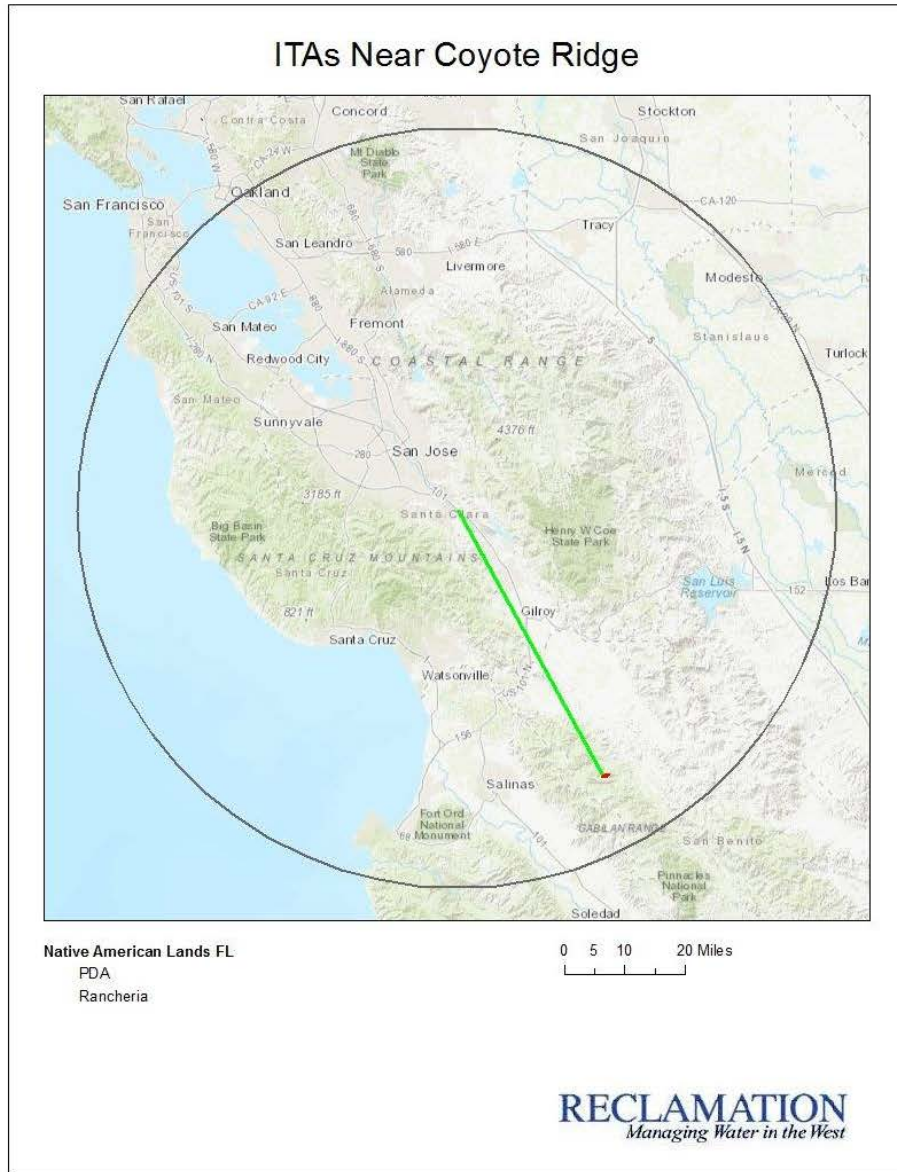
Based on the nature of the planned work it does not appear to be in an area that will impact Indian hunting or fishing resources or water rights nor is the proposed activity on actual Indian lands. It is reasonable to assume that the proposed action will not have any impacts on ITAs.

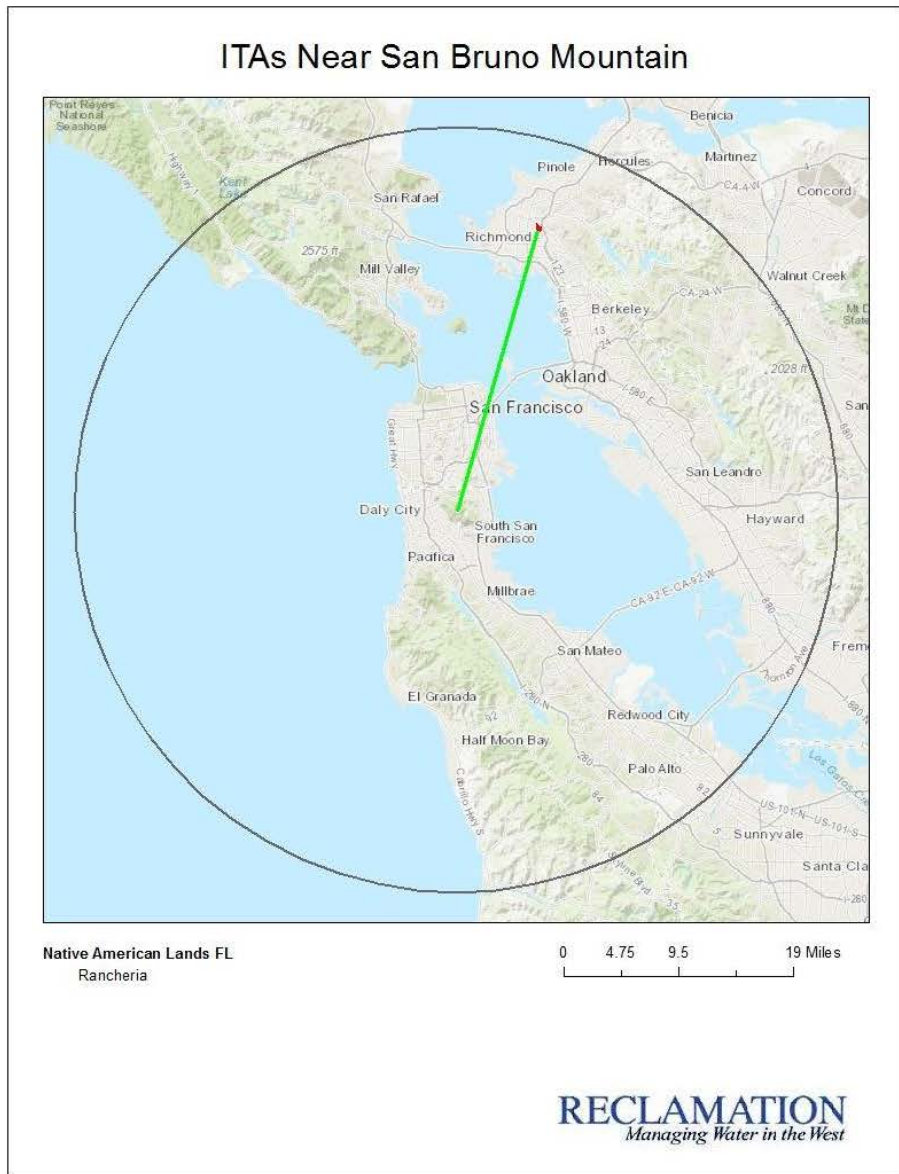
K. Clancy
Signature

Kevin Clancy
Printed name of approver

10/24/2017
Date

10/22/2015





Appendix C Memo Authorizing Collection



Strait, Daniel <dstrait@usbr.gov>

Re: Request for documentation of USFWS TE 30659A-2

1 message

Markegard, Sarah <sarah_markegard@fws.gov>

Mon, Oct 23, 2017 at 4:30 PM

To: Christal Niederer <christal@creeksidescience.com>

Cc: Daniel Strait <dstrait@usbr.gov>, "Stuart B. Weiss" <stu@creeksidescience.com>

Hi Christal,

You may consider the email that I sent to you on January 11, 2017 official authorization from our office to conduct the BCB translocation from Coyote Ridge to San Bruno. Term and Condition #8 of your permit ("Taking of the Bay checkerspot butterfly") specifically states, "Translocations to areas other than those specified below must first be approved by the SFWO and **may** require an amendment to this recovery permit."

We decided that an amendment to your permit was not necessary for the requested activity, and therefore, we moved forward with an email approval.

Please let me know if you have additional questions or need more information!

Sarah

On Mon, Oct 23, 2017 at 4:01 PM, Christal Niederer <christal@creeksidescience.com> wrote:

Hi Dan,

We basically used the email from Sarah as the addendum to our USFWS permit TE 30659A-2, allowing us to transfer BCB to SBM. I don't think we ever received anything more formal.

Sarah, to confirm, are you comfortable with us using this email, or is there a more formal addendum we should use?
cn

----- Forwarded message -----

From: **Christal Niederer** <christal@creeksidescience.com>

Date: Mon, Feb 27, 2017 at 9:53 AM

Subject: Re: Request for documentation of USFWS TE 30659A-2

To: Ramona Arechiga <TRArechiga@smcgov.org>, "Stuart B. Weiss" <stu@creeksidescience.com>, kirra swenerton <kirra.swenerton@gmail.com>

Hi Ramona,

I realize this email is a written addendum to our USFWS butterfly permit. It specifically approves translocations to SBM.

Biologically, we may be able to translocate as early as this week. How is our timeline looking on your end?
cn

On Wed, Feb 22, 2017 at 6:26 PM, Ramona Arechiga <TRArechiga@smcgov.org> wrote:

Hi Christal,

Your BCB USFWS permit did not come through with your application. Can you provide that to me? I am waiting on feedback from the rangers and once I have the USFWS permit I can complete your permit letter.

Thanks,

Ramona

Ramona Arechiga

Natural Resource Manager

San Mateo County Parks Department

(650) 599-1375 Direct Line

(650) 465-3440 Cell

(650) 879-0601 Thursday & Friday Field Office

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