

ENVIRONMENTAL ASSESSMENT, FONSI AND DECISION RECORD

**BLM, Bishop Field Office
351 Pacu Lane, Suite 100
Bishop, CA 93514**

EA Number: CA-170-06-13

Lease/Serial/Case File No.: Fish Slough ACEC

Proposed Action Title/Type:

Fish Slough Rare Plant Restoration and Protection Project

Location of Proposed Action:

Fish Slough Area of Critical Environmental Concern (ACEC), Benton Management Area, Inyo and Mono Counties, CA T. 5S, R. 33E, Sections 30 and 31. Fish Slough 7.5' Quadrangle.

Applicant (if any): BLM, Bishop Field Office, Rare Plant and Recreation Project

Plan Conformance:

The proposed action is subject to the Bishop Resource Management Plan, approved March 25 1993. The proposed action was developed to implement RMP guidance and is designed to ensure conformance with General Policies, Area Manager's Guidelines, Valid Existing Management, Standard Operating Procedures, Decisions and Support Needs prescribed in the Bishop RMP. The proposed action has been reviewed and is in conformance with the plan.

Need for Proposed Action:

The proposed action was developed to implement Bishop RMP (BLM, 1993) direction to protect and enhance unique or important vegetation communities and wildlife habitats - specifically, yearlong protection of endangered threatened, candidate, and sensitive plant and animal species. The proposed action would implement the following RMP Decisions specific to rare plants and wetland protection in the Fish Slough Area of Critical Environmental Concern.

1. Maintain or enhance habitat for endangered, threatened, and candidate species, and other species of management concern (BLM, 1993, p. 40).
2. Relocate existing roads out of riparian areas (BLM, 1993, p. 13).

3. Yearlong protection of Zone 1 of the ACEC. Target resources are endangered fish and sensitive plant habitats, wetlands, cultural properties, geologic features and scenic values (BLM, 1993, p.42).

Additional RMP Decisions and Standard Operating Procedures that support the proposed action include:

1. Yearlong Protection of endangered, threatened, candidate, and sensitive plant and animal habitats (BLM, 1993, p. 17).
2. Yearlong Protection of aspen groves, meadows and riparian areas (BLM, 1993, p.17).
3. Manage candidate species, sensitive species and other species of management concern in a manner to avoid the need for listing as state or federal endangered or threatened species (BLM, 1993), p. 12).
4. Mitigation, where needed, would be applied to eliminate or reduce resource problems caused by OHV use (BLM, 1993, p. 14).

The proposed action also meets tasks identified in the USFWS Owens Basin Wetland and Aquatic Species Recovery Plan (USFWS, 1998), specifically Task 2.1.4 – Identify and restore or enhance potentially suitable habitat for rare species that have been degraded by human activities and Task 2.1.5 – Control of off-road vehicle use.

Concern about the impacts of two existing vehicle routes in the Fish Slough ACEC that currently bisect suitable habitat for the federally listed Fish Slough milk-vetch (*Astragalus lentiginosus* var. *piscinensis*) has become elevated with the recent designation of critical habitat for the species on March 31st 2005.

Description of Proposed Action:

The proposed project area is in the Fish Slough ACEC located on public lands north of Bishop and NW of U.S. 120 in the Benton Management Area. The project area encompasses alkali flats that occur along a 10 km (6 mi) stretch of spring-fed wetlands that make up Zone 1 of the ACEC.

This project would achieve direct benefits of protection and restoration of critical habitat of the Federally Threatened Fish Slough milk-vetch (*Astragalus lentiginosus* var. *piscinensis*) and BLM Special Status Plant Species; the Inyo County mariposa lily (*Calochortus excavatus*) and alkali ivesia (*Ivesia kingii* var. *kingii*) by restoring, re-routing and armoring existing roads within the Fish Slough ACEC that currently either bisect or are adjacent to habitat for these rare plant species.

The two purposes of this project are, 1) to implement an approximately $\frac{3}{4}$ mile re-route of an existing road section that bisects critical habitat and populations of both the Federally threatened Fish Slough milk-vetch, and other BLM Special Plant species; Inyo County mariposa lily and alkali ivesia, and 2) to repair erosion and provide protection against further damage to a road adjacent to Fish Slough milk-vetch habitat by armoring a 200 ft. section of existing road that provides year-round access to a popular fishing lake.

Specific actions proposed are described below.

East-Side Road Re-Route: (Figure. 1)

An existing 0.25 mile of the Fish Slough East-Side road that contains scattered salt grass (*Distichlis spicata*) and alkali cordgrass (*Spartina gracilis*) would be ripped to a depth of 10-15 cm with a D-8 dozer/backhoe with a ripper attachment. Existing berms would be pulled in to fill existing depressions and make the area level to pre-road conditions. Ripping would aerate the currently highly compacted Aquic Torriorthent soils and dislodge salt and cord grass rhizomes which would aid in re-colonization of the site. Additional planting of the site with alkali cord grass, (*Spartina gracilis*) creeping and Great Basin wild rye (*Leymus triticoides* and *L. cinereus*) as well as Fish Slough milk-vetch would occur to return the site to pre-disturbance conditions. No grading or improvement work would occur outside the footprint of existing routes or disturbed areas. Following ripping the site would be barricaded with parent rock (volcanic tuff) found on-site adjacent to the main road. This site treatment within Aquic Torriorthant soils has been effective at other target restoration sites where salt grass and cord grass rhizomes are brought to the surface which encourages vigorous re-sprouting of these species the following spring.

At the south end of the road closure, a new 0.75 mile by 30 ft. section of route through an upland, desert scrub vegetation type would be constructed using the same type of equipment as mentioned above. The dozer would travel two to three passes to establish the route. No blading of the route would occur and only large shrubs would be removed and potentially salvaged for adjacent hill climb restoration work not associated with this project. The road would be signed to direct the public to the new access.

All improvements would be limited to the least intensive method required to achieve project objectives.

Road Armoring

An existing 200 ft. section of an existing road would be armored by filling the existing route with a 2-3 foot layer of shale (approximately 1,000 tons) obtained from an existing Los Angeles Department of Water and Power mineral material site up Silver Canyon in the White Mountains. The shale is very angular which allows sufficient drainage yet provides an armored surface which doesn't sink under frequent vehicular traffic. A D-8 dozer and a loader would be used to haul and spread the shale on the road surface.

The existing rock barricade along both sides of the road would be left in place to encourage visitors to stay on the existing route and not drive around into the populations of Fish Slough milk-vetch and alkali ivesia that are adjacent to the road (Fig. 2).

Project Implementation Requirements

The following protective measures would be applied during restoration project implementation to reduce the probability of residual impacts and the need for subsequent mitigation:

1. Prior to any ground disturbing activity for route improvement, route re-route or route closure, the route would be surveyed for archaeological resources. Project design would be adjusted to avoid identified cultural properties and ensure their protection. If previously undiscovered surface or subsurface cultural resources are found during project implementation project activities in the area would be stopped and evaluated by the Bishop Field Office Archaeologist.
2. Vehiclular access to the proposed project area would occur on an existing road/vehicle track.
3. Improvements to designated routes and adjacent parking areas and undeveloped campsites would be completed before redundant access routes to sites are closed to ensure recreational access.
4. The source of any road base or fill required for project implementation would be approved by the Bishop Field Office Botanist prior to use to avoid the spread of noxious weeds.
5. All vehicles, tools and material used pre and post project implementation would be pressure-washed prior to transport to the project site to avoid the spread of noxious weeds.
6. Surveys for invasive weed infestations would be completed prior to and the completion of the project. If any invasive weeds are identified within or adjacent to the project areas, the weeds would be removed to reduce the risk of an invasive soil seed bank developing.
7. All improvements required for project implementation would be limited to the least intensive method required to meet project objectives.

8. A training session would be provided to all construction personnel to educate them on the avoidance and minimization measures and of the potential impacts of construction activities.
9. Biological monitors would be present at the project site during construction-related activities
10. Staging areas would be clearly flagged to prevent heavy equipment from damaging sensitive habitats and plant species.

Environmental Impacts:

The proposed action is not within a Wilderness, Wilderness Study Area, nor Wild and Scenic River corridor, and there would be no effects on any lands so designated.

Air quality would not be affected. The proposed action is within the Mono Basin / Owens Valley federal non-attainment area. [or] The proposed action is not within a federal air quality non-attainment area. The action would not result in the emission of PM₁₀.

There would be no impacts to prime farm lands, flood plains, nor water quality (including ground or surface waters).

There would be no disproportionate impacts to low income or minority groups, per Executive Order 12898 (2/11/94).

There would be no impacts to mineral resources. No mineral resources occur in the project area.

There would be no impacts to range resources. The project area is not within a grazing allotment nor is grazing an authorized use on BLM administered lands within Zone 1 of the Fish Slough ACEC.

Area of Critical Environmental Concern

Proposed Action

The proposed action would meet management objectives outlined in the Fish Slough Management Plan (1984). Specifically, the proposed action would;

1. Provide protection to sensitive resources and natural values of the area while allowing for reasonable vehicle access.
2. Provide for increased public awareness and understanding of the unique resources which occur within the ACEC.

The proposed action directly benefits the resources within the Fish Slough ACEC by protecting and restoring critical habitat for the Fish Slough milk-vetch and other BLM special status plant species.

No Action

The No Action alternative would cause increases in vehicular impacts to rare plant habitat that could lead to the federal listing of the associated species that occupy this habitat. By not implementing this action several Bishop RMP (BLM, 1993) management directives would also not be met.

Threatened and Endangered Species

Proposed Action

The federally threatened Fish Slough milk-vetch occurs within the project area, but not within any of the actual routes that would either be ripped, re-routed or armored. Plants occur within 30 ft. of the road armoring site and within a 100 ft. of the road ripping site. No plants occur in proximity to the road re-route site because 3 out of the four critical habitat constituents (USFWS, 2005) do not exist in the desert scrub vegetation type, e.g.

1. Alkaline soils that occur in areas with little or no slope, and which overlay a groundwater table that is 19 to 60 inches below the land surface;
2. Plant associations dominated by *Spartina – Sporobolus*, or where a sparse amount of *Chrysothamnus albidus* occurs in the transition zone between *Spartina – Sporobolus* and *Chrysothamnus albidus – Distichlis* plant associations;
3. The Hydrologic conditions that provide suitable periods of soil moisture and chemistry for Fish Slough milk-vetch germination, growth, reproduction, and dispersal.

The only Fish Slough milk-vetch critical habitat constituent element that exists adjacent to the road re-route location is: The presence of pollinator populations for the species. This desert scrub habitat type is dominant in the project area as well as throughout the entire Fish Slough ACEC. Because the proposed action would entail a small percentage, e.g. less than 5% removal of shrubs along the new route, pollinator habitat would not be adversely affected.

There would be no impact to critical habitat because all work would be completed in areas that are currently devoid of vegetation due to off-highway vehicle use. The proposed action would actually restore an impacted area allowing for the recovery of native vegetation.

No Action

The No Action alternative would cause increases in vehicular impacts to Fish Slough milk vetch critical habitat constituents, to include; potential alterations of site hydrology, and increased risk of invasive weeds. Plants would also be at increased risk of being damaged by vehicles not staying on designated routes. In addition by not implementing this action, several Bishop RMP (BLM, 1993) management directives would not be met.

Cultural resources

Proposed Action

The proposed realignment route was originally intensively surveyed under BLM Class III standards (< 30 meter spaced transects) by Mark Giambastiani and the University of California Field School in 1993. A corridor 150 meters wide was surveyed. The work was conducted under the supervision of the Bishop Field Office archaeologist. No sites were found on the proposed route. One site, CA-MNO-1992, is located adjacent to the north end of the route and test excavation units were placed in this locality to determine if the route would impact the site. The route was then realigned to avoid affecting CA-MNO-1992. Giambastiani (2004) also completed further block surveys in the area, which contained a half mile of the proposed route. No sites were recorded within the route corridor during this inventory. Due to the vagaries of time, the potential of exposure of previously buried or unrecognized sites exists due to both geomorphic and anthropogenic processes. Therefore, the desired road re-route and any ground disturbing activity areas will be re-evaluated for archaeological resources prior to project implementation.

Therefore, based upon the surveys described above and the realignment of the trail to avoid a sensitive site, there would be no direct, indirect or cumulative effects to heritage/cultural resource values. The project would not adversely affect districts or sites listed in, or eligible for listing in, the National Register of Historic Places, nor would it result in loss or destruction of significant cultural properties.

There is potential, however, for the discovery of yet undiscovered cultural properties during trail re-routing. If these resources are identified the trail would be re-routed or relocated to avoid these cultural resource sites.

No Action

By not implementing the proposed action there would be an increased risk of vehicular impacts to archaeological sites that currently exist adjacent the road armoring and road ripping site because vehicles drive outside these routes when wet.

Recreation Opportunities

A wide variety of dispersed recreation activities occur within the proposed project area including OHV touring, mountain biking, bird watching, rock climbing and enjoyment of the natural setting. Access to recreational opportunities is mainly via county maintained roads and/or the unimproved dirt routes like the “eastside” road adjacent to Zone 1 of the Fish Slough ACEC. These routes were designated in the Bishop Resource Management Plan (RMP, BLM 1993). The designation for all routes on BLM managed public lands outside of the Poleta Canyon Open Areas is “limited”. In completing the RMP, the Recreation Opportunity Spectrum planning system was used. Lands within the proposed project area are managed for Semi-Primitive Motorized Recreation.

On November 21st, 1996 the Bishop field Office adopted the Interagency Vehicle Access Strategy. This strategy was developed to assist in the implementation of the Field Office’s vehicle access program and to meet the goals of the Bishop RMP. Implementation of the proposed action would enhance semi-primitive motorized recreational opportunities and better protect resource values within the proposed project area.

The direct effects of the proposed action on existing recreational access in the proposed project area is summarized below.

Route Access

Access to both the eastside road and to Fish Slough Lake would be improved. The eastside route re-route would provide year-round access across a more suitable soil type that would avoid a location that is inundated with water during winter and early spring. The route that would be armored leading to Fish Slough Lake would be improved to ensure proper drainage and reduce ponding which would facilitate vehicular access to the lake during winter and spring.

No Action

By not implementing the proposed action access to routes would not be improved and impacts to sensitive resources would continue.

Visual resources

The proposed project area is located within a Visual Resource Management (VRM) Class II Objective area. The objective of this class is to retain the existing character of the landscape. The level of change to the characteristic landscape would be low. Management activities may be seen from key observation points, but should not attract the attention of the casual observer. Any changes must repeat the basic elements of form, line, color, and texture found in the predominant natural features of the characteristic landscape.

The proposed action would be implemented using predominately natural materials and/or materials characteristic of the existing Volcanic Tableland landscape. Barriers used to direct vehicle travel to the re-route would use local Bishop Tuff material. VRM standards would not be compromised.

No Action

By not implementing the proposed action increases in route proliferation around the existing routes would continue and could compromise VRM standards.

Soils and Vegetation

Proposed Action

Upland soils in the proposed project area are comprised of the Blindspring complex consisting of gravelly loamy sands. Parent material consists of ashy alluvium that has a rapid permeability and commensurately low to moderate available water capacity. Alkali meadow soils consist of the Aquic torriorthent complex which are sandy loam in texture, and poorly drained.

Vegetation in the proposed project area is a mosaic of desert-scrub, alkali scrub and alkali meadow. Dominant upland shrub species include shadscale (*Atriplex confertifolia*), parry's saltbush (*Atriplex parryi*), greasewood (*Sarcobatus vermiculatus*), inkweed (*Sueda moquini*), and white rabbitbrush (*Chrysothamnus albidus*). The alkali meadow community is a rare natural community, State-ranked S2.1 (very threatened). Dominant species include a variety of perennial grasses such as salt grass (*Distichlis spicata*), alkali cordgrass (*Spartina gracilis*), Great Basin and creeping rye wild rye (*Leymus cinereus* and *L. triticoides*), alkali sacaton (*Sporobolus airoides*), cordgrass (*Spartina gracilis*), bluegrass (*Poa secunda* ssp. *juncifolia*) and meadow brome (*Hordeum brachyantherum*). Common rushes include baltic rush (*Juncus balticus*) and perennial forbs include *Crepis runcinata* ssp. *hallii*, *Ivesia kingii* var. *kingii* and *Pyrrocoma racemosa* var. *sessilifolia*, alkali peppergrass (*Lepidium montanum* var. *nevadense*) and blue-eyed grass (*Sisyrinchium halophytum*).

Current impacts include soil compaction, erosion, and reduced vegetation cover of key upland and alkali meadow species. Increased vehicle use and poor access under wet conditions has contributed to impacts evident by a loss of soil stability and vegetation cover in the alkali meadow community (Figs. 3 and 4).

Implementation of the proposed action would ameliorate current vehicular induced impacts such as soil compaction, erosion, and associated loss of soil stability and vegetation cover. By hardening an existing access route and re-routing another route users would be able to access recreational destinations without leaving the road to avoid wet areas. The proposed action would over the long-term improve soil surface conditions and facilitate re-vegetation of native species.

No Action

By not implementing the proposed action continued impacts to soils and vegetation would occur. Increased losses of vegetation cover and increases in soil erosion and compaction would reduce overall site productivity and capacity for regeneration.

Invasive, non-native speciesProposed Action

Low densities (<5% cover) of Bassia (*Bassia hyssopifolia*), red brome (*Bromus madritensis* ssp. *rubens*) and cheat grass (*Bromus tectorum*) occur within the project area, but not adjacent to or within any of the target routes associated with the proposed action. Implementation of the proposed action would help reduce the proliferation of these species by reducing off-road seed transport and route proliferation which creates suitable microsites for weed species.

No Action

By not implementing the proposed action increases in weed proliferation would likely occur because of ancillary effects of route proliferation.

Wildlife habitat

The Fish Slough ACEC contains a rich and diverse fauna. The relatively isolated stretch of permanent surface water and associated habitats which characterize Fish Slough have resulted in both high species diversity and the presence of several species of limited distribution to include: the federally endangered Owens pupfish (*Cyprinodon radiosus*), the Owens Valley form of speckled dace (*Rhinichthys osculus* ssp.), Owens tui chub (*Gila bicolor snyderi*), and Owens sucker (*Castostomus fumeiventris*). Two species of spring snail also are found in the ACEC; *Pyrgulopsis perturbata*, and *P. wongii*.

In addition to those species listed above, a variety of wildlife species dependent on wetland habitat during at least part of their life cycle are found here including such birds as blackbirds, marsh wrens, bitterns, ducks, and raptors (including the golden eagle, *Aquila chrysaetos*, and prairie falcon, *Falco mexicanus*).

The proposed action would not impact any of the above listed species because all potential impacts would be avoided due to the Project Implementation Requirements. Potential benefits of the proposed action would include a restoration of wildlife habitat and reduction of route proliferation through sensitive alkali meadow habitat.

Cumulative effects

Cumulative effects are direct or indirect effects that result from an action when considered with other past, present and reasonably foreseeable future actions of the agency and other agencies or private parties.

The limited scale and magnitude of the proposed action and associated environmental impacts significantly reduces the probability of negative cumulative effects associated with project implementation. The proposed action would not contribute to negative cumulative effects to the human environment or resource values in, or adjacent to the proposed project vicinity.

Description of Mitigation Measures and Residual Impacts:

Protective measures were incorporated into the proposed project design and implementation requirements (Page 4) to reduce the probability of residual impacts and the need for subsequent mitigation. No residual impacts are anticipated and no additional mitigation measures are needed or proposed.

Implementation Monitoring:

Bishop Field Office Botanist and Recreation Staff would direct and monitor project implementation to ensure conformance with project design and implementation requirements identified in the proposed action.

Effectiveness Monitoring:

Post project monitoring would be conducted annually to assess the effectiveness of the proposed project at meeting project objectives. Visitor use and compliance monitoring would be used to evaluate the effectiveness of the proposed project at meeting stated objectives to reduce OHV impacts to critical rare plant habitat, restore portions of this habitat, and maintain and improve recreational access to the visitor use areas within the Fish Slough ACEC.

Monitoring of the project would entail documenting visitor compliance on use of the new re-route and armored road through traffic counters and visual assessments by rangers and other field personnel every two weeks between November and May when sites are wet with sections of standing water. Assessments of rare plant habitat would involve documentation of changes in plant cover including of rare plant associate species, e.g. *Ivesia kingii*, *Sporobolus airoides*, *Spartina gracilis* and *Distichlis spicata* as well as documentation of any new recruitment of the Fish Slough milk-vetch and/or Inyo County mariposa lily. Cover and rare plant recruitment assessments would be made using standard BLM monitoring methods (BLM Tech. Ref 1730-1). Monitoring frequency would be once a year in May/June and success criteria would be based on, 1) a 10-15% increase in plant cover from within 3 years post-project implementation, 2) a 90% visitor compliance rate and, 3) a 90% reduction of vehicular impacts, e.g. frequency of tire tracks/driving over rare plants.

Monitoring report(s) would be attached to the original copy of this document.

Public Input:

To date several methods have been employed to receive public input to the proposed project; press releases, posting of the project on the California BLM website, and presentation of project at the local chapter of the California Native Plant Society. No comments were received during the 4-week comment period.

Persons/Agencies Consulted:

California Native Plant Society, Bristlecone Chapter (CNPS)
Eastern Sierra Audubon Society
Paul McFarland, Bishop, CA
Sneakers Motorcycle Club

References:

Bureau of Land Management. 1993. Bishop Resource Management Plan Record of Decision. U.S. Department of the Interior, Bureau of Land Management, California State Office, Sacramento, CA

Bureau of Land Management. 1984. A Management Plan for Fish Slough Area of Critical Environmental Concern. Bureau of Land Management, Bishop Field Office, Bishop, CA.

Elzinga, C.L., Salzer, D.W. and Willoughby, J.W. 1998 Measuring and Monitoring Plant Populations. BLM Technical Reference 1730-1. National Applied Resource Sciences Center. Denver, CO.

Ferren, W.R. and F.W. Davis. 1991. Biotic inventory and ecosystem characterization for Fish slough: Inyo and Mono Counties, California. Unpublished report by the Fish Slough Research Team of the University of California, Santa Barbara for the California Department of Fish and Game.

U.S. Fish and Wildlife Service. 1998. Owens Basin Wetland and Aquatic Species Recovery Plan, Inyo and Mono counties, California. Portland, Oregon.

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Date:

Reviewed By: _____ **Date:** _____
Joseph Pollini, Environmental Coordinator

FINDING OF NO SIGNIFICANT IMPACT/DECISION RECORD

I have reviewed this environmental assessment including the explanation and resolution of any potentially significant environmental impacts. The proposed project to protect and restore critical rare plant habitat in the Fish Slough ACEC has been designed to incorporate protective measures and implementation requirements that substantially reduce the potential for significant environmental impacts and no additional mitigation measures are required. I have determined that the proposed action with the mitigation measures described below would not have any significant impacts on the human environment and that an EIS is not required.

There would be no negative effect on threatened or endangered species as a result of the action.

The proposed project is also consistent with conservation strategies identified in the USFWS Owen Basin Aquatic Species Recovery Plan (USFWS, 1998).

I have determined that the proposed project is in conformance with the Bishop Resource Management Plan, which was approved March 25, 1993. This plan has been reviewed, and the proposed action conforms with the land use plan terms and conditions as required by 43 CFR 1610.5.

It is my decision to implement the project with the mitigation measures identified below.

Mitigation Measures/Remarks:

The following protective measures would be applied during restoration project implementation to reduce the probability of residual impacts and the need for subsequent mitigation:

1. Prior to any ground disturbing activity for route improvement, route re-route or route closure, the route would be surveyed for archaeological resources. Project design would be adjusted to avoid any such identified resources and ensure their protection. If previously undiscovered surface or subsurface cultural resources are found during project implementation, implementation would be stopped and the Bishop Field Office Archaeologist notified.
2. Vehicular access to the proposed project area would occur on an existing road/vehicle track.

3. Improvements to designated routes and adjacent parking areas and undeveloped campsites would be completed before redundant access routes to sites are closed to ensure recreational access.
4. The source of any road base or fill required for project implementation would be approved by the Bishop Field Office Botanist prior to use to avoid the spread of noxious weeds.
5. All vehicles, tools and material used during project implementation would be pressure-washed prior to transport to the project site to avoid the spread of noxious weeds.
6. Surveys for invasive weed infestations would be completed prior to and the completion of the project. If any invasive weeds are identified within or adjacent to the project areas, the weeds would be removed to reduce the risk of an invasive soil seed bank developing.
7. All improvements required for project implementation would be limited to the least intensive method required to meet project objectives.
8. A training session would be provided to all construction personnel to educate them on the avoidance and minimization measures and o the potential impacts of construction activities.
9. Biological monitors would be present at the project site during construction-related activities
10. staging areas would be clearly flagged to prevent heavy equipment from damaging sensitive habitats and plant species.

Authorized Official: _____
Bill Dunkelberger, Field Office Manager

Date: _____