

# Memorandum

To: CHAIR AND COMMISSIONERS  
CALIFORNIA TRANSPORTATION COMMISSION

CTC Meeting: October 19-20, 2016

Reference No.: 2.2c.(2)  
Action Item

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Subject: **APPROVAL OF PROJECT FOR FUTURE CONSIDERATION OF FUNDING**  
**04-Son-1, PM 15.1/15.7**  
**RESOLUTION E-16-77**

## **RECOMMENDATION:**

The California Department of Transportation recommends that the California Transportation Commission (Commission), as a responsible agency, approve the attached Resolution E-16-77.

## **ISSUE:**

The attached resolution proposes to approve for future consideration of funding the following project for which a Final Environmental Impact Report (FEIR) has been completed:

- State Route 1 (SR 1) in Sonoma County. Construct a new roadway on a new alignment east of existing alignment of a portion of SR 1 near the town of Bodega Bay. (PPNO 0748E)

This project in Sonoma County will realign a portion of State Route 1 between the towns of Jenner and Bodega Bay. The project is programmed in the 2016 State Highway Operation and Protection Program. The total programmed amount is \$38,370,000 for capital and support. Construction is estimated to begin in Fiscal Year 2016-17. The scope, as described for the preferred alternative, is consistent with the project scope programmed by the Commission in the 2016 State Highway Operation and Protection Program.

A copy of the FEIR has been provided to Commission staff. Resources that may be impacted by the project include: aesthetics/visual, biological resources, cultural resources, water quality, hazardous waste, and paleontology.

Potential impacts associated with the project can all be mitigated to below significance with the exception of visual/aesthetics and cultural resources. As a result, an FEIR and a Statement of Overriding Considerations was prepared for the project.

Attachments

## **CALIFORNIA TRANSPORTATION COMMISSION**

### **Resolution for Future Consideration of Funding 04-Son-1, PM 15.1/15.7 Resolution E-16-77**

- 1.1 **WHEREAS**, the California Department of Transportation (Department) has completed a Final Environmental Impact Report pursuant to the California Environmental Quality Act (CEQA) and the CEQA Guidelines for the following project:
  - State Route 1 (SR 1) in Sonoma County. Construct a new roadway on a new alignment east of existing alignment of a portion of SR 1 near the town of Bodega Bay. (PPNO 0748E)
- 1.2 **WHEREAS**, the Department has certified that a Final Environmental Impact Report has been completed pursuant to CEQA and the State CEQA Guidelines for its implementation; and
- 1.3 **WHEREAS**, the California Transportation Commission, as a responsible agency, has considered the information contained in the Final Environmental Impact Report.
- 1.4 **WHEREAS**, the project will have a significant effect on the environment.
- 1.5 **WHEREAS**, A Statement of Overriding Considerations was made pursuant to CEQA Guidelines.
- 1.6 **WHEREAS**, Findings were made pursuant to the State CEQA Guidelines.
- 2.1 **NOW, THEREFORE, BE IT RESOLVED** that the California Transportation Commission does hereby support approval of the above referenced project to allow for consideration of funding.



## STATEMENT OF OVERRIDING CONSIDERATIONS

### CALIFORNIA DEPARTMENT OF TRANSPORTATION STATEMENT OF OVERRIDING CONSIDERATIONS FOR STATE ROUTE 1 GLEASON BEACH ROADWAY REALIGNMENT PROJECT SONOMA COUNTY, CA

The following information is presented to comply with State CEQA Guidelines (Title 14 California Code of Regulations, Chapter 3, Section 15903), and the Department of Transportation and California Transportation Commission Environmental Regulations (Title 21 California Code of Regulations, Chapter 11, Section 1501). Reference is made to the Final Environmental Impact Report (FEIR) for the project, which is the basic source for the information.

The following impacts have been identified as significant and not fully mitigable:

#### AESTHETICS/VISUAL AND LAND USE PLANNING

**Significant Impact VIS-1:** Implementation of the Preferred Build Alternative would have a significant impact on the visual quality of scenic views in the project area. The proposed project would not be consistent with the Sonoma County (2001) Local Coastal Plan (LCP), which serves to protect the scenic quality of coastal resources along the Sonoma coastline.

#### CULTURAL RESOURCES

**Significant Impact CUL-2:** Implementation of the Preferred Build Alternative would have a significant impact on the historic Gleason-Mann-Ballard Ranch property.

Overriding considerations that support approval of this recommended project are as follows:

The proposed project is located in a rural coastal area in unincorporated Sonoma County, California, between PMs 15.1 and 15.7, immediately southeast of Gleason Beach, and would move SR 1 several hundred feet inland. The project is approximately 5 miles north of Bodega Bay, California, and is within the Duncans Mills U.S. Geological Survey 7.5-minute topographic quadrangle. The proposed project crosses the Scotty Creek channel.

The proposed project consists of constructing a two-lane roadway, including a bridge over Scotty Creek, replacing the current alignment and its capacity.

### **Project Purpose**

The purpose of this project is to protect SR 1 from coastal erosion while maintaining SR 1's long-term regional and local connectivity for the surrounding communities.

### **Project Need**

Along the Gleason Beach section of SR 1 in Sonoma County, coastal bluff erosion is threatening the stability of the highway. The historical coastal bluff erosion rate at the locations adjacent to the project site is about one foot per year. Efforts at preserving the roadway in place using piles are expected to be only temporarily effective, due to the continual erosion of the coastline. No stabilization measures, including piles, can stave off erosive effects along the coastline. In addition, several seawalls installed at the toe of the bluff are still in place, resulting in an uneven coastline unsuitable for constructing an engineered revetment (i.e., structure to protect and stabilize the cliff face).

### **BUILD ALTERNATIVES**

Design alternatives were developed to meet the project purpose and need while avoiding or minimizing environmental effects. Overall, 21 Build Alternatives were considered, and all but three were rejected prior to the preparation of the Draft EIR/EA for various reasons, including environmental, visual effects, and private property access concerns. The Build Alternatives that were considered in the Draft EIR/EA included Alternatives 19A, 19B, and 20; the fourth alternative that was analyzed in the Draft EIR/EA was the No-Build Alternative under which the proposed project would not occur.

### **Identification of the Preferred Alternative**

Caltrans formed a Project Development Team consisting of representatives from multiple functional offices, including environmental, design, maintenance, right-of-way, and project management, to develop and analyze the Preferred Alternative. Caltrans has identified Build Alternative 19A as the Preferred Build Alternative, because it meets the project purpose and need and it is the Wetlands Only Practicable Alternative. The Preferred Build Alternative 19A, would construct a 3,700-foot roadway with an approximately 900-foot bridge across Scotty Creek.

## FINDINGS

### CALIFORNIA DEPARTMENT OF TRANSPORTATION FINDINGS FOR STATE ROUTE 1 GLEASON BEACH ROADWAY REALIGNMENT PROJECT SONOMA COUNTY, CA

The following information is presented to comply with State CEQA Guidelines (Title 14 California Code of Regulations, Chapter 3, Section 15901) and the Department of Transportation and California Transportation Commission Environmental Regulations (Title 21, California Code of Regulations, Chapter 11, Section 1501). Reference is made to the Final Environmental Impact Report (FEIR) for the project, which is the basic source for the information.

The following effects have been identified in the EIR as resulting from the project. Effects found not to be significant have not been included.

#### **AESTHETICS/VISUAL AND LAND USE PLANNING**

**Significant Impact VIS-1:** Implementation of the Preferred Build Alternative would have a significant impact on the visual quality of scenic views in the project area. The proposed project would not be consistent with the Sonoma County (2001) Local Coastal Plan (LCP), which serves to protect the scenic quality of coastal resources along the Sonoma coastline.

#### **Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR. With avoidance, minimization and mitigation measures (AMMS), the impact to visual resources could not be reduced to a less than significant impact for the project area. The impact to the visual resources due to the project still remain significant. In addition, because of the significant impacts to visual resources, the AMMS will also not change the inconsistency of the project with the Sonoma County LCP.

#### **Statement of Facts:**

The visual character of the Gleason Beach community from various viewpoints would undergo a substantial change with the introduction of the prominent, visually dominant

concrete, urban-industrial bridge structure of SR 1 into the natural, rustic setting of Gleason Beach.

The following measures to mitigate visual effects will be implemented. With respect to visual effects that would affect the historical resource of the Gleason-Mann-Ballard Ranch, please refer to Mitigation Measure CUL-5, above.

- **Mitigation Measure VISUAL-1: Reduce Shoulder Widths.** To minimize any decline in visual character and quality due to increased scale and dominance of the proposed roadway as seen by motorists, reduce paved area of shoulders to 4 feet with an additional 4 feet of unpaved shoulder on non-bridge portions of the project, where feasible.
- **Mitigation Measure VISUAL-2: Bridge Design Enhancement Measures.** To increase project visual character compatibility and enhance project visual unity and quality, bridge design enhancement measures (such as column, bent, and parapet design) shall be developed during the design phase. Surface texture treatments will be applied to reduce brightness and the potential for concrete reflectivity. The goal of bridge design will be to make the structure as visually thin, light and streamlined as possible, with a curving alignment that blends into the local geography.
- **Mitigation Measure VISUAL-3: Re-vegetation of Bridge Embankments.** Re-vegetation of graded bridge embankments in the project right-of-way will include locally native species in addition to typical erosion control species.
- **Mitigation Measure VISUAL-4: Rip-rap Design Treatment.** The proposed rip-rap area visible from the beach will employ rock material of an appropriate size, scale, and color such that it reduces visual contrast and enhances visual character compatibility with the adjoining beach.
- **Mitigation Measure VISUAL-5: Plant Landscape Screening In Right-of-Way East of Bridge.** To reduce the visual intrusion of the bridge into foreground views from Gleason-Mann-Ballard Ranch, small groupings of native or local typical trees, or shrubs and forbs will be planted within the project right-of-way east of the bridge to the north and south of the westward ocean view corridor to filter, frame, and soften views of the bridge as seen from the ranch. This measure will reduce the overall amount of bridge visible from the ranch while minimizing

blockage of ocean views. The location of plantings shall be coordinated with Caltrans' Office of Cultural Resource Studies.

## **CULTURAL RESOURCES:**

The following impacts to cultural resources would result from implementation of the Preferred Build Alternative:

**Significant Impact CUL-1:** Implementation of the Preferred Build Alternative would have a significant impact on archaeology properties.

### **Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR.

### **Statement of Facts:**

Construction activities would adversely affect four archaeological properties under the preferred Build Alternative. Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4 (described below) of the Final EIR will be implemented to mitigate impacts to archaeological resources.

- **Mitigation Measure CUL-1: Preparation of an Environmentally Sensitive Area Action Plan.** Environmentally Sensitive Area (ESA) Action Plans will be prepared by a qualified archaeologist and architectural historian, as needed. The Plans will include a discussion of requirements to protect all known resources, or portions of resources, from indirect construction by placing barrier fencing around known boundaries. Prior to construction, construction personnel will be instructed on the protection and avoidance of cultural resources.
- **Mitigation Measure CUL-2: Data Recovery Plan.** If archaeological resources cannot be avoided, a pre-construction Phase III Data Recovery Plan will be prepared by a qualified archaeologist for all significant archaeological sites that will be directly affected if the sites cannot be avoided. Data recovery will only occur in the portion of the site being directly affected.

- **Mitigation Measure CUL-3: Construction Monitoring.** A Cultural Resources Construction Monitoring Plan will be developed prior to construction. An archaeological monitor will be onsite during construction activities to identify significant features and human remains. Prior to construction, construction personnel will be instructed on the protection and avoidance of cultural resources.
- **Mitigation Measure CUL-4: Unanticipated Discovery of Cultural Resources.** If previously unidentified cultural materials are unearthed during construction, it is Caltrans' policy that work will be halted in that area until a qualified archaeologist can assess the significance of the find. Additional archaeological survey will be needed if project limits are extended beyond the present survey limits.

**Significant Impact CUL-2:** Implementation of the Preferred Build Alternative would have a significant impact on the historic Gleason-Mann-Ballard Ranch property.

**Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR. However, the significance of this impact on the historic Gleason-Mann-Ballard Ranch property would not be reduced to a less than significant level even with implementation of Mitigation Measures CUL-1 through CUL-5 and VISUAL-1 through VISUAL-5.

**Statement of Facts:**

The significant adverse change to the Gleason-Mann-Ballard Ranch will be mitigated through a Memorandum of Agreement between Caltrans and SHPO, which will require a preparation and execution of a Historic Property Treatment Plan to mitigate for the adverse change to this resource. In addition, Mitigation Measure CUL-5 will be implemented by Caltrans, as described below.

- **Mitigation Measure CUL-5: CEQA-Specific Mitigation – Interpretive Signage and Materials:** Develop interpretive signage on early Sonoma County coastal dairy farms. Signage will be installed in the project area or in the vicinity of the project if a suitable location can be identified. The exact location will be determined at a later date. Additional mitigation to be undertaken includes

interpretive materials, such as a brochure on coastal dairies that includes information about the Gleason-Mann-Ballard Ranch. Even with implementation of Mitigation Measure CUL-5, the impact to the scenic quality of the Gleason-Mann-Ballard Ranch by the proposed project will remain significant and unavoidable.

However, the significance of this impact would not be reduced to a less than significant level even with implementation of Mitigation Measures VISUAL-1 through VISUAL-5, described below.

**Significant Impact CUL-3:** Implementation of the Preferred Build Alternative could have a significant impact on the discovery of human remains.

**Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR.

**Statement of Facts:**

Mitigation Measures CUL-1, CUL-2, CUL-3, and CUL-4 of the Final EIR will be implemented to mitigate impacts to human remains.

**BIOLOGICAL RESOURCES:**

The following impacts to biological resources would result from implementation of the Preferred Build Alternative:

**Significant Impact BIO-1:** Implementation of the Preferred Build Alternative would have a significant impact on protected coastal terrace prairie.

**Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR.

**Statement of Facts:**

The Preferred Build Alternative would significantly impact coastal terrace prairie but this impact would be minimized and mitigated through the enhancement of nearby coastal terrace prairie. Enhancements to coastal terrace prairie enhancements will offset the loss of this and Myrtle's silverspot butterfly habitat within the BSA as determined through Section 7 consultation with USFWS. This mitigation will compensate for the loss of, and reduction of the biological value of, the Myrtle's silverspot butterfly habitat within the BSA.

The proposed project has been designed to minimize permanent impacts to coastal terrace prairie by designing a bridge that avoids impacts to larger portions of coastal terrace prairie. Temporary impacts on coastal terrace prairie will be limited by restricting project activities to the existing and new rights-of-way. Effects to coastal prairie habitat will be offset through the purchase or enhancement of coastal terrace prairie habitat, which is described in Mitigation Measure BIO-B: Compensatory Mitigation for Myrtle's Silverspot Butterfly in Section 2.3.5, Threatened and Endangered Species. Other measures including BMPs (see Measure AIR-1: Construction Period Best Management Practices in Appendix F, and Water Quality AMMs WATER-1: SWPPP and WATER-6: Design Pollution Prevention Measures in Section 2.2.2) are designed to minimize construction-related pollutants and dust and their potential impacts to coastal terrace prairie. The following AMMs will further minimize the project's impacts on this community:

- **Measure BIO-1: Revegetation.** After construction activities are complete, any temporary fill or construction debris will be removed and disturbed areas restored to their pre-project conditions or improved through native plantings. An area subject to "temporary" disturbance includes any area that is disturbed during the project, but that, after project completion, will not be subject to further disturbance and has the potential to be re-vegetated. Appropriate methods and plant species used to re-vegetate such areas will be determined on a site-specific basis. All areas that are temporarily affected during construction will be re-vegetated with an assemblage of native species appropriate for the local area and fauna. Invasive, exotic plants will be controlled within the BSA to the maximum extent practicable pursuant to EO 13112.
- **Measure BIO-2: ESA Fencing.** The final construction drawings will show all environmentally sensitive areas (ESAs), the equivalent to LCP ESHAs. These areas include features with high ecological value such as wetlands and western

dog violet [*Viola adunca*], discussed in Sections 2.3.3 and 2.3.5). Prior to the commencement of construction activities, high-visibility fencing and wildlife exclusion fencing, or a combination thereof, will be erected around active work areas. The fencing will help prevent the encroachment of construction personnel and equipment into sensitive areas during construction activities and to limit the entry of wildlife into the project site. The fencing shall be inspected and maintained by the contractor until the project is complete.

**Significant Impact BIO-2:** Implementation of the Preferred Build Alternative would have a significant impact on protected jurisdictional wetlands and other water features.

**Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR.

**Statement of Facts:**

Table 2-20 in Section 2.3.2 of the Final EIR shows the impacts to wetland and water features within the BSA with implementation of the Preferred Build Alternative. The project would result in direct permanent impacts to wetlands and other water features. Impacts would occur as a result of grading, cut-and-fill activities, and paving activities. In addition, the water diversion activities would have direct temporary impacts to Scotty Creek. Indirect permanent impacts could occur due to grading of the hillside to construct the roadway in the southern portion of the proposed project. The roadway cut may alter the direction and amount of water flow and in doing so could reduce the volume of water feeding the wetlands south of south of Scotty Creek (Figures 2-29 and 2-30).

Temporary and permanent impacts to wetlands and other waters are considered a potentially significant impact given the biological importance of these habitats.

The proposed project is anticipated to result in long-term beneficial permanent impacts on Scotty Creek as a result of removing the culverts and bridge supporting the current SR 1 alignment over the creek. This would restore approximately 0.08 acre of streambed under each Build Alternative within USACE, CCC, RWQCB, and CDFW jurisdictions. The replacement of the existing bridge box culverts with a full-span bridge would improve the function of Scotty Creek by restoring the natural creek bottom and daylighting the creek.

Several AMMs would protect wetlands and other waters, and other environmentally sensitive habitat areas (ESHAs) defined in the CCA and Sonoma County (2001) LCP to reduce or offset the direct temporary and permanent adverse impacts on these features. The potential for significant impacts from erosion and sediment transport to the creek would be reduced by implementing temporary and permanent BMPs outlined in the Stormwater Pollution Prevention Plan (SWPPP), which will be developed during the design phase of this project. Caltrans erosion control BMPs will be implemented to minimize any wind- or water-related erosion as identified in Measure AIR-1: Construction Period Best Management Practices in Appendix F, and Water Quality AMMs WATER-1: SWPPP and WATER-6: Design Pollution Prevention Measures (provided in Section 2.2.2, Water Quality and Stormwater Runoff). Caltrans will implement the General AMMs identified previously in Section 2.3.1, Natural Communities, including Measures BIO-1: Revegetation and BIO-2: ESA Fencing.

- **Measure BIO-4: Wetland Impact Minimization.** To minimize impacts to wetlands that cannot be avoided during construction, the Preferred Build Alternative will limit vehicle movement and include the use of protective matting where feasible.
- **Mitigation Measure BIO-A: Compensatory Mitigation for Jurisdictional Water Features.** Caltrans will mitigate for permanent adverse impacts to jurisdictional wetlands and other waters, which consist of conversion of wetlands to hardscaping. Following CWA and California Coastal Act guidance and CCC, USACE, CDFW and RWQCB permitting requirements, Caltrans expects to mitigate impacts at a minimum ratio of 3:1 for permanent impacts to jurisdictional features (of all agencies). Feasible mitigation options include, but are not limited to, in-lieu fees provided towards the enhancement of wetlands along the Sonoma Coast, including habitat on lands owned by State Parks, The Wildlands Conservancy, or other similar entities. State Parks and The Wildlands Conservancy have expressed an ability to, and an interest in, providing this enhancement. This mitigation will offset the project's reduction in wetlands so that there is no net loss of wetlands.

**Significant Impact BIO-3:** Implementation of the Preferred Build Alternative would conflict with the Sonoma County Local Coastal Program (LCP) in that the proposed project would not avoid significant impacts to wetlands and other water features.

**Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR.

**Statement of Facts:**

The Sonoma County (2001) LCP states that projects that would result in the placement of fill in wetlands are prohibited unless otherwise permitted under Section 30233 of the California Coastal Act, which addresses diking, filling, and dredging activities. The Sonoma County LCP prohibits construction of agricultural, commercial, industrial and residential structures between 100 and 300 feet of wetlands unless an environment assessment finds the wetland would not be affected by such construction. The Build Alternatives' permanent impact to wetlands would be in conflict with the CCA and Sonoma County LCP wetland protection policies. This conflict is reconciled through the balancing provision provided in CCA Sections 30007.5 and 30200. This provision allows impacts to wetlands when the impacts are avoided, minimized, and mitigated to the greatest degree practicable and the project, on balance, is determined to be more protective of coastal resources than damaging.

In addition, Caltrans has incorporated the following AMM into the proposed project to reduce project impacts on wetlands and other waters:

- **Measure BIO-3: Sonoma County Local Coastal Plan Management Measures.** Caltrans will implement measures from the Sonoma County LCP to avoid and minimize impacts on wetlands. These measures relevant to wetlands and other waters include, but are not limited to, excluding motor vehicles from wetlands except where critical to construction, limiting dredging to the smallest amount feasible, minimizing construction on land adjacent to wetlands, and prohibiting wetland vegetation removal unless it is essential to project implementation. Staging and access plans will be described in the project specifications and contract bid package and will clearly provide direction on how to avoid unnecessary access through, and work in, wetlands.

Mitigation ratios and a mitigation plan will be finalized during the permitting process through coordination with all applicable state and federal agencies, including USACE, the RWQCB, Sonoma County, and the CCC. Temporary impacts to these resources will be

mitigated through onsite habitat restoration. Funding enhancement of riparian and streambed habitat within and adjacent to the project will also be considered in the permitting stage of the project when Caltrans is able to engage in right-of-way coordination and to fully coordinate and implement this option.

**Significant Impact BIO-4:** Implementation of the Preferred Build Alternative would have a significant impact on the Myrtle's silverspot butterfly.

**Findings:**

In addition to changes or alterations that have been required in, or incorporated into, the project, mitigation will be implemented to lessen the significant environmental impact as identified in the Final EIR.

**Statement of Facts:**

The project would diminish the suitability of the project site to support the Myrtle's silverspot butterfly and may reduce the size or extent of the local population. Therefore, the project may have a significant impact on the species. The proposed project's impacts would be mitigated through the enhancement of suitable habitat at a minimum 1:1 ratio. The mitigation is described in Measure BIO-B below.

Although the project contains AMMs that would minimize impacts to Myrtle's silverspot butterfly, significant impacts would still occur, and mitigation is needed to offset the impacts to this resource. Implementation of the AMMs listed in Sections 2.3.1 and 2.3.5 would reduce the potential for impacts to Myrtle's silverspot butterfly during project construction. These include Measure BIO-1: Revegetation, Measure BIO-2: ESA Fencing, Measure BIO-5: Pre-construction Plant Surveys, Measure BIO-6: Worker Environmental Awareness Training, Measure BIO-7: Pre-construction Wildlife Surveys, and Measure BIO-8: Biological Monitoring). In addition, Caltrans has incorporated the following species-specific AMM into the proposed project to reduce project impacts on the Myrtle's silverspot butterfly:

- **Measure BIO-9: Protection of western dog violet.** The host plant for larval Myrtle's silverspot butterfly will be avoided to the greatest extent possible, and exclusionary fencing will be installed around avoidable plants observed during pre-construction plant surveys per the directions of the qualified biologist. Because western dog violets grow at scattered, patchily distributed locations

within the coastal terrace prairie habitat of the BSA, it may not be feasible to completely avoid them. Where the violets cannot be avoided, they will be relocated, if feasible, to suitable habitat outside the project area or at a selected mitigation site.

- **Mitigation Measure BIO-B: Compensatory Mitigation for Myrtle's Silverspot Butterfly.** Caltrans will fund the enhancement of Myrtle's silverspot butterfly habitat onsite to reduce the project's permanent effects (the conversion of occupied Myrtle's silverspot butterfly habitat to hardscape and changes to grazing regime). Caltrans will also fund the enhancement of Myrtle's silverspot butterfly habitat offsite, as needed, to offset the permanent loss of butterfly habitat that will occur as a result of this project, at a minimum of a 1:1 ratio. Caltrans has identified that funding the enhancement of habitat on lands owned by State Parks, as managed or operated by the Gold Ridge or Sonoma Resource Conservation District, is a feasible and effective means of mitigating the project's effects. The enhancement would occur on high quality remnant grasslands within the Sonoma Coast State Park, located within the butterfly's dispersal distance of the project. The enhancement will involve managing invading Douglas-fir (*Pseudotsuga menziesii*) and encroaching shrubs and control of any potential invasive, non-native species that might occur on selected sites. Rapid rotational sheep grazing to remove thatch through the mitigation period is proposed to follow these treatments. Success criteria will include increases in nectar and host species and detections of Myrtle's silverspot butterfly. This mitigation project will provide comparable or superior larval and foraging habitat to compensate for the project's conversion of such habitat. Myrtle's silverspot butterfly mitigation is considered feasible because the stated entities have communicated the ability and interest in providing the enhancement.

During the permitting stage of the project, Caltrans will scope other mitigation options, such as securing conservation easements on private land in areas known to support butterfly habitat. Caltrans will work with USFWS to identify such mitigation options. The mitigation will compensate for project impacts by improving habitat values for the species within dispersal distance of the BSA.

AMMs described previously, along with Mitigation Measure BIO-B, Compensatory Mitigation for Myrtle's silverspot butterfly, would offset the direct loss of larval and foraging habitat by enhancing remnant nearby coastal grasslands to improve the value to

the species. This mitigation will reduce potentially significant impacts on the Myrtle's silverspot butterfly to less than significant.