

Memo



To: Independent Consultants for Gopher & Prairie Plant Inspection

From: Thurston County Government

Date: April 26, 2021

Re: **THREE VERY IMPORTANT INSPECTION INSTRUCTIONS for 2021**

Please carefully observe the three instructions below during the 2021 inspection season. The instructions below are in the 2021 Gopher Inspection Protocol document. They were in the 2020 Gopher Inspection Protocol, too, but were frequently overlooked. **If not followed this year, inspection will not count as one of the two required gopher inspections.**

- 1. Consultant must place mow requests on parcels with poor ground visibility.**
If ground visibility is poor, inspection will not count as one of the two required visits.
- 2. Consultants must reschedule MPG inspection if mowing occurred too recently.**
If mounds are damaged from recent mowing, inspection will not be counted as one of the two required visits. (i.e. And consultant puts applicant at risk of liability associated with failure to comply with the federal Endangered Species Act.).
- 3. Consultant must not leave 'Mound Table' blank on page 2 of the data form.**
If no mounds are observed, indicate by putting "0" in the box.
 - a. Fully complete **all** reports and data forms before submitting to the County.
 - b. Specifically, ALL fields must be filled out in the mound table at the top of page 2 on the data form.
 - c. Failure to complete the data form may lead to inspection not being counted as one of the two required visits.



2021 GOPHER INSPECTION PROTOCOL & PROCEDURE

The following information describes the Thurston County screening protocol for 2021 to assess the likelihood of take of three subspecies of Mazama pocket gopher (*Thomomys mazama*) (MPG) protected under the Thurston County Critical Areas Ordinance (CAO) and federal Endangered Species Act.

A. General Information-2021 Approach

1. The MPG review season will run June 1-October 31, 2021.
2. The protocol described in this memorandum will only apply to properties not known to be occupied by MPG since April 2014, the date of the federal listing
 - a. Exception: Properties that were found to be occupied by MPGs can apply for another review five years after the initial determination.
3. Negative determinations will be valid for the length of the underlying County permit or approval, per County code.
4. Qualified consultants may perform field reviews and submit results for County evaluation, per the CAO. Consultants must have received training from USFWS at one of the two trainings offered in May/June 2018, and in 2019.

B. In-Office Procedures

1. County staff will review land use applications to determine if the MPG field screening protocols described in this memorandum must be initiated for the following:
 - a. Within 600 feet of a site known to have positive MPG occurrence; or
 - b. On or within 300 feet of a soil type known to be associated with MPG occupancy.
2. County staff will determine if other factors preclude the need for field screening. See Preliminary assessment below.
3. County staff will notify applicants if their application cannot be excluded from further review.
4. Applicants may hire a consultant to perform field review, or may request that field review be conducted by County staff according to the protocol described in this memorandum.
5. County staff will review critical area reports submitted by consultants.

6. For sites to be screened by the County, staff will coordinate site visits with landowners/applicants, ensure advance notification and property access, and develop site-visit schedules.
7. For sites where no MPG activity is observed, the County will provide applicants with a project condition that requires them to stop construction activity and alert the County and USFWS if evidence of MPG occupancy is observed.
8. Thurston County landowners who know or learn that Mazama pocket gophers are present on their property can move forward with their proposed development by: 1) proposing mitigation to the County as directed in the County's Critical Areas Ordinance (Title 24 TCC); or 2) contacting USFWS directly to discuss the review, assessment, and mitigation process most appropriate for their site(s) and proposed activities; or 3) waiting to participate in the yet to be completed Thurston County HCP.

C. Preliminary Assessment

As land use applications are received, properties mapped with or within 300 feet of gopher and/or prairie soils undergo the following preliminary assessment in-office.

1. For properties or project areas that appear to meet County criteria below, an internal review is conducted by staff biologist to determine if the project may be released from the full gopher review process. The following criteria may release a project from further gopher review.
 - a. Locations west of the Black River, or on the Steamboat Island or Cooper Point peninsulas.
 - b. Sites submerged for 30 consecutive days or more since October 31, 2020.
 - c. Sites covered with impervious surfaces (as defined in CAO Chapter 17.15 and Title 24)
 - d. Fully forested (>30%) sites with shrub and fern understory.
 - e. Sites that consist of slopes greater than 40 percent, or that contain landslide hazard areas (per existing County regulations).
 - f. Sites on less preferred MPG soils north of Interstate 5.
 - g. Building to take place in the footprint of an existing structure (also mobile home replacements in the same footprint).
 - h. Mobile home replacements in existing lots in an existing mobile home park.
 - i. Heating oil tank removal
 - j. Foundation repair
 - k. Projects which lie >300 feet from mapped gopher soils.
 - l. Replacement wells and utilities.
2. If a property and/or project area do not meet internal review criteria, the project is put on a list to be scheduled for full MPG review during the appropriate seasonal review period.

3. In addition to the in-office preliminary assessment, the County HCP biologist may, if time allows, visit properties prior to the first gopher review in order to screen for prairie habitat. This screening process focuses on the presence or absence of native prairie plants, Oregon white oak trees (*Quercus garryana*), or Mirna mounds protected under the Critical Areas Ordinance (CAO).

D. Implementation Measures

In order to ensure the review process runs efficiently, the following measures will be implemented as part of the 2021 screening approach. These are intended to reduce costs and staff time, and ensure that MPG screening requests, especially those associated with building permit applications, are screened during the screening season.

1. No soil verification will be required in conjunction with MPG field screening.
2. Site mowing or bushing will be required to initiate first site visits, where necessary and feasible, and completed two to four weeks in advance of the site visit
3. No further screening will be conducted in 2021 following the detection of MPG mounds on a property. The County will notify landowners that MPG evidence has been detected within two weeks.
4. At the end of the 2021 season, County staff will provide data regarding MPG occupancy to USFWS.
5. No additional site visit will be required if indeterminate mounds are detected, if the full number of required visits has been completed.
6. The County will prioritize project specific applications over non-project applications. This will help ensure that applicants that have projects ready for construction will receive necessary permits and may initiate construction in a timely manner.

E. Site Visit Overview

County field personnel or hired consultants will conduct field observations to determine MPG presence on sites with potential habitat. These site visits will be conducted as follows:

1. All valid site visits must be conducted from June 1 through October 31, 2021. Site visits outside that survey window will not be considered valid.
2. A site or parcel is considered to be the entire property, not just the footprint of the proposed project.
3. Sites with less preferred soils (see Attachment A) will be visited two (2) times, at least 30 days apart.
4. Sites with more preferred soils (see Attachment A) will be visited two (2) times, at least 30 days apart.

5. Site conditions must be recorded on a data sheet. A separate data sheet shall be submitted for each site visit. Similar information may also be documented in narrative form. A template data sheet can be found on the County website at <https://www.thurstoncountywa.gov/planning/Pages/hcp-gopher-reviews.aspx>. Document and describe which areas of the parcel cannot be screened due to limited accessibility and/or dense understory. This should be depicted on an aerial or site plan submitted to the County.
6. The ground must be easily visible to ensure mound observation and identification. **Request mowing if necessary, to ensure visibility. Wait two to three weeks after mowing before beginning screening.**

F. Detailed Field Methodology

1. The survey crew orients themselves with the layout of the property using aerial maps, and strategizes their route for walking through the property.
2. Start GPS to record survey route.
3. Walk the survey transects methodically, slowly walking a straight line and scanning an area approximately 2-3 meters to the left and right as you walk, looking for mounds. Transects should be no more than five (5) meters apart when conducted by a single individual.
4. If the survey is performed by a team, walk together in parallel lines approximately 5 meters apart while you are scanning left to right for mounds.
5. At each mound found, stop and identify it as an MPG or mole mound. If it is an MPG mound, identify it as a singular mound or a group (3 mounds or more) on a data sheet to be submitted to the County. (County has developed data sheets for your use on <https://www.thurstoncountywa.gov/planning/Pages/hcp-gopher-reviews.aspx>)
6. Record all positive MPG mounds, likely MPG mounds, and MPG mound groups in a GPS unit that provides a date, time, georeferenced point, and other required information in County GPS data instruction for each MPG mound. Submit GPS data in a form acceptable to the County. County GPS Data instruction can be found at <https://www.thurstoncountywa.gov/planning/Pages/hcp-gopher-reviews.aspx>
7. Photograph all MPG mounds or MPG mound groups. At a minimum, photograph MPG mounds or MPG mound groups representative of MPG detections on site.
8. Photos of mounds should include one that has identifiable landscape features for reference. In order to accurately depict the presence of gopher activity on a specific property, the following series of photos should be submitted to the County:
 - a. At least one up-close photo to depict mound characteristics
 - b. At least one photo depicting groups of mounds as a whole (when groups are encountered).

- c. At least one photo depicting gopher mounds with recognizable landscape features in the background, at each location where mounds are detected on a property
- d. Photos can be taken with the GPS unit or a separate, camera, preferably a camera with locational features (latitude, longitude)
- e. Photo point description or noteworthy landscape or other features to aid in relocation.

Additional photos

- f. The approximate building footprint location from at least two cardinal directions.
 - g. Landscape photos to depict habitat type and in some cases to indicate why not all portions of a property require gopher screening.
9. Describe and/or quantify what portion and proportion of the property was screened, and record your survey route and any MPG mounds found on either an aerial or parcel map.
10. If MPG mounds are observed on a site, that day's survey effort should continue until the entire site is screened and all mounds present identified, but additional site visits are not required.
11. In order for the County to accurately review Critical Area Reports submitted in lieu of County field inspections, the information collected in the field (GPS, data sheets, field notes, transect representations on aerial, etc.) shall be filed with the County prior to October 31st, 2021. GPS information (in electronic form) shall be submitted in a form approved by the County.

Attachment A

Table 1. Soils known to be associated with Mazama pocket gopher occupancy.

Mazama Pocket Gopher Preference Category	Soil Type
More Preferred (formerly High and Medium Preference Soils)	Nisqually loamy fine sand, 0 to 3 percent slopes Nisqually loamy fine sand, 3 to 15 percent slopes Spanaway-Nisqually complex, 2 to 10 percent slopes Cagey loamy sand Indianola loamy sand, 0 to 3 percent slopes Spanaway gravelly sandy loam, 0 to 3 percent slopes Spanaway gravelly sandy loam, 3 to 15% slopes
Less Preferred (formerly Low Preference Soils)	Alderwood gravelly sandy loam, 0 to 3 percent slopes Alderwood gravelly sandy loam, 3 to 15 percent slopes Everett very gravelly sandy loam, 0 to 3 percent slopes Everett very gravelly sandy loam, 3 to 15 percent slopes Indianola loamy sand, 3 to 15 percent slopes Kapowsin silt loam, 3 to 15 percent slopes McKenna gravelly silt loam, 0 to 5 percent slopes Norma fine sandy loam Norma silt loam Spana gravelly loam Spanaway stony sandy loam, 0 to 3 percent slopes Spanaway stony sandy loam, 3 to 15 percent slopes Yelm fine sandy loam, 0 to 3 percent slopes Yelm fine sandy loam, 3 to 15 percent slopes