

**Mitigation Monitoring and Reporting Program
Garberville Sanitary District - Robertson/Wallan/Hurlbutt Tanks Replacement Project**

The California Environmental Quality Act (CEQA) requires that when a lead agency adopts an Initial Study/Mitigated Negative Declaration (IS/MND), it must also adopt a mitigation monitoring and reporting program (MMRP) for all required mitigation measures (CEQA Guidelines Section 15097). This MMRP identifies the monitoring program for mitigation measures identified by the IS/MND to reduce or avoid impacts associated with implementing the proposed Garberville Sanitary District - Robertson/Wallan/Hurlbutt Tanks Replacement Project. The MMRP shall be maintained by Garberville Sanitary District (GSD, the District).

Mitigation Measure	Implementation Phase	Monitoring Phase	Enforcement Agency	Level of Significance After Mitigation	Verification of Compliance		
					Initials	Date	Remarks
<p>AES-1: International Dark-Sky Association Compliance All new outdoor lighting fixtures shall comply with the International Dark-Sky Association's (IDA) requirements for reducing waste of ambient light (that is, shall be "dark sky compliant"). This includes, but is not limited to, requirements for acceptable fixture types and maximum color temperature. The IDA recommendations can be found on their website at the following address: https://www.darksky.org/our-work/lighting/lighting-for-citizens/lighting-basics/.</p>	GSD with the Project Engineer and Construction Contractor shall be responsible for implementing AES-1 during design and construction.	GSD shall be responsible for confirming compliance following construction and ongoing during project operation	GSD	Less-Than-Significant			
<p>AQ-1: Fugitive Dust Control Measures Compliance with these requirements shall be required to minimize dust generation during construction activity.</p> <ul style="list-style-type: none"> All active construction areas (for example, parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered a minimum of two times per day during the dry season; Hydroseed or apply non-toxic soil stabilizers to inactive construction areas; Dust-generating activities shall be limited during periods of high winds (over 15 mph); Suspend excavation and grading activity when winds exceed 25 mph; All haul trucks transporting soil, sand, or other loose material, likely to give rise to airborne dust, shall be covered; All vehicle speeds shall be limited to 15 miles per hour within the construction area; Promptly remove earth or other tracked out material from paved streets onto which earth, or other material has been transported by trucking or earth-moving equipment; and Conduct digging, backfilling, and paving of utility trenches in such a manner as to minimize the creation of airborne dust. 	GSD with the Construction Contractor shall be responsible for implementing AQ-1 during construction activities.	GSD with Construction Contractor shall be responsible for monitoring AQ-1 during construction activities.	North Coast Unified Air Quality Management District (NCUAQMD)	Less-Than-Significant			

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<p>BIO-1: Nesting Bird Surveys</p> <p>To avoid potential impacts to nesting birds, in accordance with the Migratory Bird Treaty Act, one of the following shall be implemented:</p> <ul style="list-style-type: none"> • Conduct vegetation removal and other ground disturbance activities associated with any construction activities between September and mid-March, when birds are not typically nesting, or • If vegetation removal, structure modification or removal, or ground-disturbing activity is to take place during the nesting season (March 15 to August 31 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Preconstruction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS and CDFW and implemented to prevent abandonment of the active nest. 	GSD with the Construction Contractor and a Qualified Biologist shall be responsible for implementing BIO-1 prior to and during any construction activities proposed during the nesting bird season.	GSD with a Qualified Biologist shall be responsible for monitoring BIO-1 during construction activities.	California Department of Fish and Wildlife (CDFW) and U.S. Fish and Wildlife Service (USFWS)	Less-Than-Significant			
<p>BIO-2: Protect Special-status Bats</p> <p>Within two weeks prior to construction, a qualified bat biologist shall conduct habitat surveys for special-status bats. Survey methodology shall include visual examination of suitable habitat areas and signs of bat use. Trees, water tanks, pump stations, and other potential bat habitats within at least 100 feet of construction activities shall be examined. If habitat exists, species presence and site use patterns shall be documented by using ultrasonic detectors to determine if special-status bat species are present on site. Bat presence in the project area may vary seasonally and annually. Surveys shall be conducted in a manner to detect the presence of hibernating or torpid bats, reproductive colonies and/or migratory stop-over roosts. If no bat utilization or roosts are found, then no further study or action is required. If bats are found to be present within an area of potential impact, or presence is assumed, a bat specialist shall be engaged to advise the best method to prevent impact. This may include, but would not be limited to:</p> <ul style="list-style-type: none"> • Consultation with the California Department of Fish and Wildlife to determine appropriate measures for protecting bats with young if present, and for implementing measures to exclude non-breeding bat colonies during construction process. • For trees, phased removal of trees where selected limbs and branches not containing cavities are removed on the first day, with the remainder of the tree removed on the second day. • For structures, gradual modification of the habitat itself discouraging continued roosting by any bats that may be present, followed by installing physical barriers to prevent bats from entering the structure(s). 	GSD with a Qualified Biologist shall be responsible for implementing BIO-2 within two weeks prior to construction.	GSD with a Qualified Biologist shall be responsible for monitoring BIO-2 prior to and during construction activities.	CDFW	Less-Than-Significant			
<p>BIO-3: Avoidance and Minimization Measures to Protect Sensitive Natural Communities</p> <p>The District shall implement the following avoidance and protection measures for sensitive natural communities (purple needlegrass grassland and California oatgrass grassland) that would not be impacted during project construction:</p>	GSD with the Project Engineer and a Qualified Biologist shall be responsible for	GSD with a Qualified Biologist shall be responsible for monitoring BIO-3	CDFW	Less-Than-Significant			

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<ol style="list-style-type: none"> The District shall attempt to avoid or minimize impacts to sensitive natural communities to the greatest extent feasible in the final design plans. Sensitive natural communities shall be clearly identified in the construction documents and reviewed by the District prior to issuing for bid to ensure they are clearly marked as equipment exclusion zones during construction. Prior to construction, temporary fencing shall be installed between the sensitive vegetation communities and the project if construction activities will occur within 50 feet of the sensitive vegetation community, to prevent accidental incursion. 	implementing BIO-3 during design, bidding, and prior to construction.	during construction activities.					
<p>BIO-4: Mitigation for Sensitive Natural Communities</p> <p>Construction within mapped sensitive natural communities (purple needlegrass grassland and California oatgrass grassland) shall be avoided to the greatest extent practicable. If impacts are unavoidable and mapped purple needlegrass grassland or California oatgrass grassland is removed or detrimentally impacted, mitigation would occur. A Mitigation and Monitoring Plan shall be prepared in coordination with the California Department of Fish and Wildlife. The Plan shall be acceptable to the California Department of Fish and Wildlife and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The ratio and conditions of mitigation would be negotiated in consultation with the California Department of Fish and Wildlife. The Plan shall be implemented by the District.</p>	GSD with a Qualified Biologist shall be responsible for implementing BIO-4 prior to, during, and after construction activities.	GSD with a Qualified Biologist shall be responsible for monitoring BIO-4 prior to, during, and after construction activities.	CDFW	Less-Than-Significant			
<p>BIO-5: Avoidance and Minimization Measures to Project Wetlands/Waters</p> <p>The District shall implement the following avoidance and protection measures for Waters of the United States and Waters of the State that would not be impacted (filled or excavated) during project construction:</p> <ol style="list-style-type: none"> The District shall attempt to avoid or minimize impacts to wetlands/waters to the greatest extent feasible in the final design plans. Wetlands/waters shall be clearly identified in the construction documents and reviewed by the District prior to issuing for bid to ensure they are clearly marked as equipment exclusion zones during construction. Suitable perimeter control BMPs, such as silt fences, or straw wattles shall be placed below all construction activities at the edge of surface water features to intercept sediment before it reaches the waterway. These BMPs shall be installed prior to any clearing or grading activities. 	GSD with the Project Engineer and a Qualified Biologist shall be responsible for implementing BIO-5 during design, bidding, and prior to construction.	GSD with a Qualified Biologist shall be responsible for monitoring BIO-5 during construction activities.	GSD, CDFW, State Water Resources Control Board (SWRCB), North Coast Regional Water Quality Control Board (NCRWQCB)	Less-Than-Significant			
<p>BIO-6: Mitigation for Loss of Wetlands and Waters</p> <p>The District shall avoid fill of jurisdictional wetlands and waters to the extent feasible. If fill cannot be avoided, the District shall compensate for the loss of wetland habitat so that there is no net loss in wetlands. The District shall compensate for impacts to identified wetlands through restoration, rehabilitation, and/or creation of wetland at a ratio of no less than 1:1. A</p>	GSD with a Qualified Biologist shall be responsible for implementing BIO-6 prior to, during, and	GSD with a Qualified Biologist shall be responsible for monitoring BIO-6 prior to, during, and	U.S. Army Corps of Engineers (USACE), NCRWQCB, CDFW	Less-Than-Significant			

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<p>Mitigation and Monitoring Plan shall be prepared in coordination with the NCRWQB, the USACE, and CDFW. Compensation for wetlands shall occur so there is no net loss of wetland habitat at ratios to be determined in consultation with the NCRWQCB. The Plan shall be acceptable to the regulatory agencies with jurisdiction over wetlands and waters and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The Plan shall be implemented by the District.</p> <p>The District shall also compensate for impacts to other waters by obtaining required permits from the U.S. Army Corp of Engineers, the North Coast Regional Water Quality Control Board, and/or the California Department of Fish and Game which shall be received prior to the start of any on-site construction activity. The District shall ensure any additional measures outlined in the permits are implemented.</p>	after construction activities.	after construction activities.					
<p>CR-1: Protocols for Inadvertent Discovery of Cultural Resources</p> <p>If cultural resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist will be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known or likely to be associated with Native American heritage (precontact sites and select historic period sites), the Tribal Historic Preservation Officers (THPOs) and Council Members for the Bear River Band of Rohnerville Rancheria, Round Valley Reservation/Covelo Indian Community, the InterTribal Sinkyone Wilderness Council, and the Wailaki Tribe are also to be contacted immediately to evaluate the discovery and, in consultation with the project proponent, the County, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Precontact materials which could be encountered include: obsidian and chert debitage or formal tools, grinding implements, (e.g., pestles, handstones, bowl mortars, slabs), locally darkened midden, deposits of shell, faunal remains, and human burials. Historic archaeological discoveries may include nineteenth century building foundations, structural remains, or concentrations of artifacts made of glass, ceramics, metal, or other materials found in buried pits, old wells, or privies.</p>	GSD with the Construction Contractor shall be responsible for implementing CR-1 during construction activities.	GSD with the Construction Contractor shall be responsible for monitoring CR-1 during construction activities.	GSD and the THPOs and Council Members for the Bear River Band of Rohnerville Rancheria, Round Valley Reservation/ Covelo Indian Community, the InterTribal Sinkyone Wilderness Council, and the Wailaki Tribe.	Less-Than-Significant			
<p>GEO-1: Adherence to Engineering Geologic and Geotechnical Investigation Report Recommendations</p> <p>Adherence to all project specific recommendations in the SHN Engineering Geologic and Geotechnical Investigation Report (SHN, 2023c) shall be required during design and construction of the proposed project. Project specific recommendations pertain to topics such as Site Preparation and Grading, Wet Weather Subgrade Protection, Select Engineered Fill, Excavations and Temporary Shoring, Utility Trench Backfill, Soil Corrosion Potential, Foundations, and Retaining Walls.</p>	GSD with the Project Engineer and Construction Contractor shall be responsible for implementing GEO-1 prior to and during construction activities.	GSD with the Project Engineer and Construction Contractor shall be responsible for monitoring GEO-1 prior to and during construction activities.	GSD	Less-Than-Significant			

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<p>GEO-2: Inadvertent Discovery Protocol – Paleontological Resources</p> <p>In the event that fossils or other paleontological resources are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they will be properly curated and preserved.</p>	GSD with the Construction Contractor shall be responsible for implementing GEO-2 during ground-disturbing activities.	GSD with the Construction Contractor shall be responsible for monitoring GEO-2 during ground-disturbing activities.	GSD	Less-Than-Significant			
<p>NO-1: Construction Noise Limitations</p> <p>The following measures will be implemented during construction activities to reduce noise levels:</p> <ul style="list-style-type: none"> • Construction activities shall be restricted to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday, and between the hours of 9:00 a.m. and 5:00 p.m. on Saturdays and Sundays. • Construction activity will not occur on holidays. 	GSD with the Construction Contractor shall be responsible for implementing NO-1 during construction activities.	GSD with the Construction Contractor shall be responsible for monitoring NO-1 during construction activities.	GSD	Less-Than-Significant			