

# Mitigation and Monitoring Plan: OUE RAW Implementation

Mitigation Measure	Requirements of Measure	Applicant Responsibilities	Party Responsible for Verification	Method of Verification	Verification Timing
<b>Air Quality</b>					
<b>AQ/mm-1</b>	<p>The project contractor, on behalf of the project applicant, shall prepare a dust control plan for construction activities at the project site pursuant to the requirements of the MCAQMD. The project contractor shall be responsible for ensuring that all adequate dust control measures are implemented in a timely manner during all phases of construction and maintenance activities at the project site. The dust control plan shall include, the following measures:</p> <p>a. Water shall be applied by means of truck(s), hoses, and/or sprinklers as needed prior to any land clearing or earth movement to minimize dust emissions.</p> <p>b. All material excavated, stockpiled, or graded shall be sufficiently watered to prevent fugitive dust from leaving the property boundaries or causing a public nuisance of an ambient air standard. Watering should occur at least twice daily, however frequency of watering shall be based on the type of operation, soil, and wind exposure.</p> <p>c. All on-site vehicle traffic shall be limited to a speed of 15 miles per hour on unpaved roads.</p> <p>d. All trucks hauling soil, sand, or other loose materials on public roads will be covered or required to maintain at least two feet of freeboard.</p> <p>e. All land clearing, grading, earth moving, and/or excavation activities shall be suspended as necessary, based on site conditions, to prevent excessive windblown dust when winds are expected to exceed 20 miles per hour.</p> <p>f. Excavation and grading activities shall be suspended when sustained winds exceed 25 mph, instantaneous gusts exceed 35 mph, or dust from construction might obscure driver visibility on public roads.</p> <p>g. All inactive portions of the construction site, including soil stockpiles, shall be covered, seeded, or watered until a suitable cover is established. Alternatively, apply City approved nontoxic soil stabilizers (according to manufacturers' specifications) to all inactive construction areas (previously graded areas that remain inactive for four consecutive days). Acceptable materials that may be used for chemical soil stabilization include petroleum resins, asphaltic emulsions, acrylics, and adhesives that do not violate Regional Water Quality Control Board (RWQCB) or California Air Resources Board (CARB) standards.</p> <p>h. Paved areas adjacent to construction sites (the abandoned runway) shall be swept or washed as required to remove excess accumulations of silt and/or mud, which may have resulted from grading and construction activities at the project site.</p> <p>i. The project proponent shall re-establish ground cover on all disturbed portions of the project site through seeding and watering in accordance with the City of Fort Bragg Grading Ordinance and Local Coastal Program, which requires the application of native seed or terminal seed.</p> <p>j. A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 24-hours. The telephone number of the MCAQMD shall also be visible to ensure compliance with the Fugitive Dust Emissions requirements.</p> <p>k. Construction workers shall park in designated parking area(s) to help reduce dust emissions.</p>	Prepare and implement a dust control plan for construction activities	City of Fort Bragg	Review plan and onsite monitoring	Prior to and during construction

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<b>EIR Addendum Mitigation Measure 9.1</b>	<ul style="list-style-type: none"> <li>Excavation activities for remedial activities will be suspended if winds exceed 15 miles per hour (mph) sustained (for 15 minutes) or 25 mph (instantaneous gusts).</li> <li>Soil stockpiles associated with remedial activities will be placed atop and covered with heavy-duty plastic sheeting when they are not actively being managed. Stockpile covering will be in good condition, joined at the seams, and securely anchored to minimize headspace where vapors may accumulate.</li> <li>Open bodied trucks utilized for remedial activities shall be covered when used to transport materials with the potential for airborne dust.</li> <li>The equipment (trucks, excavators) used for remedial activities will be primarily cleaned by sweeping or brushing to remove visible soil. Soil that cannot be removed by this procedure will be removed from equipment by washing in a contained area. Wash water will be collected, characterized, and appropriately disposed or recycled in accordance with applicable federal, state, and local requirements.</li> </ul>	Monitor wind conditions, stop excavation if winds exceed 15MPH, cover soil stockpiles, cover trucks for transport, clean equipment	City of Fort Bragg	Monitor construction	During construction
<b>EIR Addendum Mitigation Measure 9.2</b>	<ul style="list-style-type: none"> <li>Temporary staging areas will be set up adjacent to OU-E RAW excavations for soil stockpiling. Excavated material will be placed on plastic sheeting and covered by plastic sheeting to mitigate migration of affected soil, shield the material from elements, and mitigate fugitive dust and stormwater run-on and runoff.</li> <li>Visible soils carried onto Cypress Street and/or SR 1 via trucks, earth moving equipment, water, or other means that occurs from remediation activities shall be promptly removed.</li> </ul>	Soil stockpiling on plastic sheeting, clean streets and SR1 of soils, materials and water	City of Fort Bragg	Monitor construction	During construction
<b>Cultural Resources</b>					
AR/mm-4:	If cultural materials are discovered during construction, all earth-moving activity within 100 feet of the immediate discovery area will halt until a qualified archaeologist can assess the nature and significance of the find.	Halt Construction and determine course of action	Project Archaeologist	Visual	During grading activities
AR/mm-5:	If human remains are discovered, State Health and Safety Code Section 7050.5 states that further disturbances and activities shall cease in any area or nearby area suspected to overlie remains, and the County Coroner contacted. Pursuant to Public Resources Code Section 5097.98, if the remains are thought to be Native American, the coroner will notify the THPO who will then notify the Most Likely Descendent (MLD). At this time, the person who discovered the remains will contact the project archaeologist so that they may work with the MLD on the respectful treatment and disposition of the remains. Further provisions of PRC 5097.98 are to be followed as applicable.	Halt construction and contact NAHC if human remains are found	Project Archaeologist	Visual	During grading activities
AR/mm-6:	The City shall require native American monitoring of all construction activities that will result in grading or movement of native soils in cultural resource areas as identified in the Data Collection Plan.	Hire native american monitors and notify of need	Project Archaeologist	Visual	During grading activities within cultural resource
<b>EIR Addendum Mitigation Measure 2.1</b>	o A professional archaeologist, meeting the minimum requirements in accordance with the Secretary of Interior's Professional Qualifications, 36CFR Part 61, and a Native American tribal monitor, both Hazardous Waste Operations and Emergency Response (HazWOPER) trained and certified, will be on site during all ground disturbing activities implemented pursuant to the OU-E RAW. Copies of current HazWOPER certification will be provided to DTSC and the City prior to implementation of ground disturbing OU-E RAW activities.	Hazwoper Trained archaeologist and tribal monitors	DTSC	Certificate	Prior to construction

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EIR Addendum Mitigation Measure 2.2	Tribal monitoring services will be required whenever construction activities include ground disturbance of native or disturbed soils, as the site includes extensive areas of fill that may have been moved in the past from archaeological sites on the property. The tribal monitoring crew size shall be determined by the Project Archaeologist. At minimum, however, there shall be one tribal monitor for every separate area of native ground disturbing activity that is simultaneously occurring at least thirty (30) meters apart. A general rule of thumb when determining if a monitor is required is that one monitor is required for every piece of operational ground disturbing equipment in an area that requires monitoring.	Tribal monitoring, Section 106 consultation, stop work as required, notification, remediation alternatives	City of Fort Bragg, DTSC	Tribal monitoring, reports, consultation	During and after construction and ongoing
EIR Addendum Mitigation Measure 2.3	<p>During construction activities, if any archaeological artifacts or features are encountered, both the Project Archaeologist and the tribal monitors are empowered to stop construction activities within a 50 foot radius of the find. Work within this buffer shall temporarily cease until the Project Archaeologist, in consultation with the tribal monitor, make a determination on (1) whether the find is an archaeological artifact; (2) whether the find is located within an intact context (i.e. not within disturbed fill soils), (3) whether the find is an isolated item, (4) whether the find is part of a larger previously unknown archaeological site; and (5) the best course of action to avoid or minimize impacts to the resources as applicable. If the Project Archaeologist and the tribal monitor disagree about the nature of the find and/or any of items 1 through 5 above, the professional Archaeologist will e-mail a photo to the Tribal Chairman for additional input before construction in the buffer area may resume.</p> <p>i. If the find is determined to be both in an intact context, and meets the standard for designation as an archaeological site or is a portion of a known archaeological site, then work shall cease and the DTSC shall determine the best course of action given the level and type of contamination and the type of archaeological resource. Appropriate courses of action include:</p> <ol style="list-style-type: none"> <li>1. DTSC could halt excavation activities at the location, fill the excavation, and re-evaluate the remedial action of the location in the Operable Unit E Feasibility Study and Remedial Action Plan.</li> <li>2. Leave the contaminated soils in place and cap the site as a mitigation for the protection of the cultural resource site;</li> <li>3. Remove the contaminated soils. Extract and clean artifacts from the contaminated soils for the tribe to reburial in the designated cultural resource reburial area on the City's Coastal Trail property.</li> </ol> <p>ii. If the find is determined to be in a disturbed context or an isolated find that is clearly not associated with an archaeological site, all cultural items shall be recorded as such and then collected, cleaned and returned to the tribe for reburial in the designated cultural resource reburial area on the City's Coastal Trail property or other area as agreed upon in writing by the parties.</p>	Tribal monitoring, Section 106 consultation, stop work as required, notification, remediation alternatives	City of Fort Bragg, DTSC	Tribal monitoring, reports, consultation	During and after construction and ongoing
<b>Biological Resources</b>					
BR/mm-1	During construction, permanent and temporary impacts to ESHA natural communities shall be avoided/minimized to the extent feasible. The ESHA natural communities which have the potential to be disturbed by the project shall be shown on site plans. Areas in which grading or other disturbance is to occur shall be defined on-site by readily identifiable barriers that will protect the surrounding native habitat areas. Construction equipment and other vehicles shall be prevented from entering ESHA natural communities to be avoided through the use of exclusion zones or other barriers.	Avoid/minimize permanent and temporary ESHA impacts.	City of Fort Bragg	Review project plans, inspect installation for accuracy	Prior to and during construction

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BRmm-3	Prior to construction, the applicant will prepare a Hazardous Materials Response Plan or equivalent to allow for a prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All project-related hazardous materials spills within the project site will be cleaned up immediately by the contractor. Spill prevention and cleanup materials will be on-site at all times during construction.	Prepare a Hazardous Materials Response Plan.	City of Fort Bragg		Prior to construction.
BR/mm-4	During construction, to control erosion during and after project implementation, the applicant and contractors will implement standard Best Management Practices (BMPs).	Implement BMPs.	City of Fort Bragg	Field inspection	During construction.
BR/mm-5	During construction, the cleaning and refueling of equipment will occur only within a designated staging area and at least 65 ft from wetlands, other waters, or other aquatic areas. This staging area will conform to BMPs applicable to attaining zero discharge of stormwater runoff. At a minimum, all equipment and vehicles will be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills.	Avoid discharge of hazardous materials.	City of Fort Bragg	Field inspection	During construction.
BR/mm-6	During construction, trash will be contained, removed from the work site, and disposed of regularly by the contractor. Following construction, all trash and construction debris will be removed from work areas.	Contain and remove trash.	City of Fort Bragg	Field inspection	During construction.
BR/mm-8	During construction, any disturbance within jurisdictional wetlands or other waters will take place between June 15 and October 31 in any given year, when the surface water is likely to be dry or at seasonal minimum. Deviations from this work window are not permitted by the City's Certified LCP.	Avoid jurisdictional wetlands during rainy season.	City of Fort Bragg	Review of construction schedule/activities.	During construction.
BR/mm-22	If any native shoulderband snails are observed during ground disturbance activities in suitable habitat, such snails shall be relocated to suitable habitat outside of the area of disturbance to avoid/minimize injury or mortality.	Relocate shoulderband snails observed in area of disturbance.	City of Fort Bragg	Biological monitoring reports.	During construction.
BR/mm-23	Prior to construction, the City shall obtain a letter of permission or equivalent authorization from CDFG to relocate NRLF and other SSC species from work areas encountered during construction within the ADI as necessary. Qualified biologists shall capture and relocate any NRLF (if present) or other SSC species to suitable habitat outside of the area of impact. Observations of SSC species or other special-status species shall be documented on CNDDb forms and submitted to CDFG upon project completion.	Obtain a letter of permission or equivalent authorization from CDFG to relocate NRLF and other SSC species from work areas encountered during construction	City of Fort Bragg	Letter on file. Biological monitoring reports.	Prior to and during construction.
BR/mm-27	Prior to and during construction, if project activities cannot feasibly avoid the typical nesting bird season (defined as occurring from March 15 to July 31 for most bird species), weekly bird surveys of the project areas that will be under construction shall be conducted by a qualified biologist with experience in conducting breeding bird surveys, beginning 30 days prior to the disturbance of suitable nesting habitat. If a <u>protected</u> native bird nest is found, clearance/construction will not occur within an appropriate buffer/exclusion zone (determined by a qualified biologist) delineated by highly visible flagging/stakes until August 1, or until any active nests are vacated and there is no evidence of a second attempt at nesting.	Perform weekly bird surveys.	City of Fort Bragg	Review monitoring reports.	Prior to and during construction.

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BR/mm-28	Prior to and during construction, if active northern harrier nests are observed, a minimum 300-ft buffer/exclusion zone delineated by highly visible flagging/stakes shall be established by a qualified biologist around each active nest until all young have fledged. During construction within 300 ft of grassland and freshwater marsh habitats during the northern harrier breeding season, a qualified biologist shall conduct weekly monitoring visits to assess the present status of breeding activity and establish exclusion zones as needed.	Establish buffer zone for harrier nests.	City of Fort Bragg	Review monitoring reports.	Prior to and during construction.
BR/mm-29	Prior to and during construction, if active white-tailed kite nests are observed, a minimum 300-ft buffer/exclusion zone delineated by highly visible flagging/stakes shall be established by a qualified biologist around each active nest until all young have fledged.	Perform surveys for white-tailed kite.	City of Fort Bragg.	Review monitoring reports.	Prior to and during construction.
BR/mm-30	Prior to construction, nest surveys for Bryant's savannah sparrow shall be conducted by a qualified biologist if construction is proposed to occur within 100 ft of potential grassland and freshwater marsh nesting habitat during the breeding season for the species (April to July).	Perform surveys for savannah sparrow.	City of Fort Bragg.	Review monitoring reports.	Prior to and during construction.
BR/mm-31	Prior to and during construction, if active Bryant's savannah sparrow nests are observed, a minimum 100-ft buffer/exclusion zone delineated by highly visible flagging/stakes shall be established by a qualified biologist around each active nest until all young have fledged. During construction within 100 ft of grassland and freshwater marsh habitats during the Bryant's savannah sparrow breeding season, a qualified biologist shall conduct weekly monitoring visits to assess the present status of breeding activity and establish exclusion zones as needed.	Establish buffer zone for savannah sparrow nests.	City of Fort Bragg	Review monitoring reports.	Prior to and during construction.
EIR Addendum Mitigation Measure 10.1	o Temporary staging or stockpile areas will not be located within 100 feet of any sensitive habitats or ESHAs.	Placement of storage stockpiles	City of Fort Bragg	Visual inspection	During construction
EIR Addendum Mitigation Measure 26.1	o Prior to construction, vegetation removal shall be scheduled to avoid the typical nesting bird season (defined as occurring from March 15 to July 31 for most bird species), if feasible. o Prior to construction, nest surveys for Bryant's savannah sparrow shall be conducted by a qualified biologist if construction is proposed to occur within 100 ft. of potential grassland and freshwater marsh nesting habitat during the breeding season for the species (April to July). o Prior to and during construction, if active Bryant's savannah sparrow nests are observed, a minimum 100-ft buffer/exclusion zone delineated by highly visible flagging/stakes shall be established by a qualified biologist around each active nest until all young have fledged. During construction within 100 ft. of grassland and freshwater marsh habitats during the Bryant's savannah sparrow breeding season, a qualified biologist shall conduct weekly monitoring visits to assess the present status of breeding activity and establish exclusion zones as needed.	Construction window limitations or nesting bird surveys with work buffers	Project Biologist	Visual inspection	During construction
<b>Water Quality</b>					
EIR Addendum Mitigation Measure 12.1	o During construction, to control erosion during and after project implementation, the applicant and contractors for the remediation activities will implement standard California Department of Transportation (Caltrans) Best Management Practices (BMPs).	Implement BMPs.	City of Fort Bragg	Visual inspection	During construction