FIRSTCARBONSOLUTIONS™

Mitigation Monitoring and Reporting Program for the Devlin Road Construction & Demolition Debris Facility American Canyon, Napa County, California

Prepared for:



Napa-Vallejo Waste Management Authority

1195 Third Street, Suite B-10 Napa, CA 94559-3082

Contact: Richard Luthy, Executive Officer

Prepared by:

FirstCarbon Solutions

1350 Treat Boulevard, Suite 380 Walnut Creek, CA 94597

Phone: 925.357.2562

Contact: Jason Brandman, Project Director Grant Gruber, Project Manager

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Table 1: Mitigation Monitoring and Reporting Program

			Responsible for Verification	Verification o	f Completion
Mitigation Measures	Method of Verification	Timing of Verification		Date	Initial
Section 3.1—Aesthetics, Light, and Glare	'	'			
MM AES-3: NVWMA shall only install exterior light fixtures that are directed downward or employ full cut-off fixtures to minimize light spillage and avoid interference with aviation operations at the Napa County Airport.	Approval of plan	Prior to construction	Napa Vallejo Waste Management Authority		
Section 3.2—Air Quality/Greenhouse Gas Emissions					
 MM AIR-2: All construction activity: During construction activities, the following air pollution control measures shall be implemented: All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day, or more as needed. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. All vehicle speeds on unpaved roads and surfaces shall be limited to 15 miles per hour. All roadways, driveways, and sidewalks shall be paved as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 2 minutes (beyond the 5 minute limit required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 	Notes on construction plans; Site inspection	During construction activities	Napa Vallejo Waste Management Authority		

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 All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. A publicly visible sign shall be posted with a name and telephone number of the applicant's representative for dust complaints. This person shall respond and take corrective action within 2 business days of a complaint or issue notification. The Bay Area Air Quality Management District's phone number shall also be visible to ensure compliance with applicable regulations. 					
MM AIR-3a: During on-site construction activities, the applicant shall require the use of clean construction equipment. All diesel equipment shall be powered by Tier 3 engines or equivalent. In addition, all off-road equipment idling shall be limited to 2 minutes.	Notes on construction plans; Site inspection	During construction activities	Napa Vallejo Waste Management Authority		
Section 3.3—Biological Resources					
MM BIO-1a: Prior to any vegetation removal or ground-disturbing activities, focused surveys shall be conducted to determine the presence of special-status plant species with potential to occur within the project site. Surveys shall be conducted in accordance with the Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009). These guidelines require rare plant surveys to be conducted at the proper time of year when rare or endangered species are both "evident" and identifiable. Field surveys shall be scheduled to coincide with known blooming periods, and/or during periods of physiological development that are necessary to identify the plant species of concern. If no special-status plant species are found, then the project will not have any impacts to the	Notes on construction plans; Site inspection; Submittal of documentation	Prior to any vegetation removal or ground-disturbing activities	Napa Vallejo Waste Management Authority		

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species and no additional mitigation measures are necessary. If any of the special-status plant species are found and cannot be avoided, the following measures shall be required: • Where surveys determine that special-status plant species are present within the off-site development areas, direct and indirect impacts of the project on the species (e.g., dwarf downingia and legenere, or other species with potential habitat in the project area during the appropriate time of year) shall be avoided where feasible through the establishment of activity exclusion zones, where no ground-disturbing activities shall take place, including construction of new facilities, construction staging, or other temporary work areas. Activity exclusion zones for special-status plant species shall be established prior to construction activities around each occupied habitat site, the boundaries of which shall be clearly marked with standard orange plastic construction exclusion fencing or its equivalent. The establishment of activity exclusion zones shall not be required if no construction-related disturbances would occur within 250 feet of the occupied habitat site. The size of activity exclusion zones may be reduced through consultation with a qualified biologist and with concurrence from USFWS or CDFW, as applicable, based on site-specific conditions.					
MM BIO-1b: If special-status plants are found within the project site and cannot be avoided, the Applicant shall retain a qualified biologist and consult with the USFWS or CDFW, as applicable, to prepare a special-status plant mitigation and monitoring plan to determine feasible impact minimization and mitigation for those special-status plants, which may include but are not limited to elements as applicable to the species, based on the project impacts, and as modified by the resource agencies: • On-site seed/propagule salvage and transplantation to	Submittal of documentation	Prior to any vegetation removal or ground-disturbing activities (if special-status plants are found within the project site)	Napa Vallejo Waste Management Authority		

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mitigate for unavoidable temporary construction impacts to					
special-status plants habitat.					
Incorporating project site management requirements					
designed to reduce ongoing impacts from project operation,					
including controlling public access to avoided special-status					
plants habitat remaining on-site.					
• A salvage/transplanting program shall be developed, as part of					
a special-status plant mitigation and monitoring plan, for the					
salvage and transfer of special-status plants populations					
before the initiation of construction activities to another					
location either off-site or on-site that will be preserved in					
perpetuity (via conservation easement, deed restriction, or					
other appropriate legal means). Permits may be required					
from the CDFW or USFWS if a listed species is found and may require further mitigation in consultation with the appropriate					
agency or agencies. (Note: salvage/transplantation methods					
for the salvaged plant population must be developed on a					
species-by-species basis and would likely include the					
involvement of local conservation easements/preserves/open					
space, where applicable to ensure preservation in perpetuity).					
The salvage of special-status plant species must be performed					
at the correct time of year and transplanting must be					
successfully completed during the same year as construction					
was completed. The propagation program shall include					
establishment of success criteria for the affected special-					
status plants.					
Efforts shall be made to salvage portions of the habitat or					
plant populations that will be lost as a result of					
implementation of the proposed project. In addition to					
salvaging of special-status plants themselves, salvage efforts					
shall include topsoil and seed-banks surrounding impacted					
plants, if doing so will not contribute to the spread of					

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 invasive or noxious plant species. If the resource agencies determine that implementation of Mitigation Measure BIO-1b is insufficient to mitigate for the loss of special-status plants, the applicant shall instead implement Mitigation Measure BIO-1d. 					
MM BIO-1c: If special-status plants are found on-site and Mitigation Measure BIO-1b is implemented, the Applicant shall design and implement a monitoring program as part of the special-status plant mitigation and monitoring plan to evaluate compliance with and the effectiveness of these mitigation measures. The monitoring program shall be conducted by a qualified botanist, and shall take place periodically during project construction, and annually, following the completion of construction, for 5 years. The project applicant shall bear the financial responsibility for mitigation measure monitoring and reporting for the entirety of the 5-year reporting period. If the monitoring program identifies mitigation measure noncompliance or ineffectiveness, the project applicant shall fund and implement remedial measures, including but not limited to on-site habitat restoration, re-seeding, the installation and maintenance of additional fencing, and other appropriate measures. The project applicant shall ensure that sufficient funding exists to complete all reasonably foreseeable remedial actions prior to the commencement of project construction. Annual monitoring reports shall be submitted to the USFWS or CDFW as applicable.	Submittal of documentation	Following the completion of construction, for 5 years	Napa Vallejo Waste Management Authority		
MM BIO-1d: In lieu of on-site mitigation pursuant to Mitigation Measure BIO-1b and Mitigation Measure BIO-1c, as allowed in writing by the City (for CEQA-protected species only) or CDFW (for state-listed species) or USFWS (for federally listed species), mitigation requirements may be satisfied via the purchase of	Submittal of documentation	Prior to occupancy	Napa Vallejo Waste Management Authority		

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qualified mitigation credits or the preservation of off-site habitat. Appropriate off-site conservation opportunities shall be identified and, if feasible, protected in perpetuity through the purchase of conservation easements and/or mitigation bank credits. The habitat value of off-site conservation areas shall be enhanced where feasible through means such as reducing grazing intensity and restricting access. At a minimum, the loss of individuals or acres of occupied habitat (as appropriate) of a special-status species shall be compensated for through the acquisition, protection, and subsequent management of other existing occurrences at a ratio of 1:1. The resource agencies may increase the ratio depending on the rarity of the affected rare plant species (i.e., a listed species), and the abundance of					
MM BIO-2a: No more than 14 days prior to commencement of ground-disturbing activities, the project applicant shall retain a qualified biologist to conduct burrowing owl surveys and impact assessment in accordance with the latest edition of the California Department of Fish and Wildlife Staff Report on Burrowing Owl Mitigation. The survey(s) shall be submitted to CDFW. If it is determined that project activities may result in impacts to nesting, occupied, and satellite burrows or burrowing owl habitat, the project applicant shall consult with CDFW and develop a detailed mitigation plan such that the habitat acreage, number of burrows and burrowing owls impacted are replaced. The mitigation plan shall be based on the requirements set forth in the latest edition of the Staff Report on Burrowing Owl Mitigation. Mitigation shall consist of one of the following options: (1) If burrowing owls are present and direct impacts can be	Submittal of documentation	No more than 14 days prior to commencement of ground-disturbing activities	Napa Vallejo Waste Management Authority		

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avoided, the project applicant shall implement the following avoidance measures during all phases of construction to reduce or eliminate potential impacts to burrowing owls. • Avoid disturbing occupied burrows during the nesting period, from 1 February through 31 August. • Avoid impacting burrows occupied during the nonbreeding season by migratory or non-migratory resident burrowing owls. • Avoid direct destruction of burrows through chaining (dragging a heavy chain over an area to remove shrubs), disking, cultivation, and urban, industrial, or agricultural development. • Develop and implement a worker awareness program to increase the on-site workers' recognition of and commitment to burrowing owl protection. • Place visible markers near burrows to ensure that farm equipment and other machinery does not collapse burrows. • Do not fumigate, use treated bait or other means of poisoning nuisance animals in areas where burrowing owls are known or suspected to occur (e.g., sites observed with nesting owls, designated use areas). • Restrict the use of treated grain to poison mammals to the months of January and February. (2) In the event that avoidance of burrowing owl or their burrows cannot be achieved, the project applicant, in consultation with CDFW, shall prepare a Burrowing Owl Exclusion Plan as indicated and following the latest edition of the Staff Report. Monitoring of the excluded owls shall be carried out in accordance with the latest edition of the Staff Report.					
MM BIO-2b: No more than 48 hours prior to the commencement of ground-disturbing activities that occur within	Submittal of documentation	No more than 48 hours prior to the	Napa Vallejo Waste Management		

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500 feet of the pond, the project applicant shall retain a qualified biologist to conduct a pre-construction survey for the western pond turtle in and around the pond. If one or more turtles are observed to be present, the applicant shall consult with CDFW for authorization to relocate the species to suitable habitat away from the construction zone. Regardless of the presence/absence of this species within the project site, exclusion fencing shall be installed around the pond to prevent the western pond turtle from reentering this area.		commencement of ground-disturbing activities that occur within 500 feet of the pond	Authority		
MM BIO-2c: No more than 30 days prior to ground-disturbing activities that occur within 500 feet of potential nest trees for raptors or 250 feet of suitable nesting habitat for non-raptor bird species (i.e., trees, cattails, grassland) between February 1 and September 15, the project applicant retain a qualified biologist to conduct nesting bird surveys. The survey report shall be submitted to CDFW. If no active nests of Migratory Bird Treaty Act covered species are identified, then no further mitigation is required. If active nests of protected bird species are identified, the project applicant shall consult with the appropriate regulatory agencies to identify project-level mitigation requirements. Mitigation may include the following, based on current agency standards and policies: 1). The project applicant shall delay construction in the vicinity of active nest sites during the breeding season (February 1 through September 15) while the nest is occupied with adults or young. A qualified biologist shall monitor any occupied nest to determine when the nest is no longer used. If the construction cannot be delayed, avoidance measures shall include the establishment of a non-disturbance buffer zone around the nest site. The buffer zone for non-raptor species shall be 250 feet, or as determined in consultation with CDFW. The buffer zone shall be delineated with highly visible temporary construction fencing.	Notes on construction plans; Submittal of documentation	Prior to construction	Napa Vallejo Waste Management Authority		

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 No intensive disturbance (e.g., heavy equipment operation associated with construction, or use of cranes) or other project-related activities that could cause nest abandonment or forced fledging shall be initiated within the established buffer zone of an active nest between February 1 and September 15. If construction activities are unavoidable within the buffer zone, the project proponent shall consult with CDFW and retain a qualified biologist to monitor the nest site to determine if construction activities are disturbing the adult or young birds. If disturbance is observed, the biologist shall have authority to stop construction within the buffer zone until the bird species have vacated the nest of their own 					
accord. 4). If fully protected species (white-tailed kites, golden eagles) are found to be nesting near the proposed construction area, their nests shall be completely avoided until the birds fledge. Avoidance shall include the establishment of a non-disturbance buffer zone of 500 feet, or as determined in consultation with the CDFW.					
(Swainson's Hawk) Pre-construction surveys shall be conducted for a half-mile radius around all project activities and shall be completed for at least two survey periods immediately prior to project initiation. The surveys shall be conducted in accordance with CDFW's "Recommended timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley" (CDFG 2000), which identifies different survey windows throughout the pre-nesting and nesting season (ranging from January 1 through July 30/post-fledging) that have different survey methodologies and requirements, as set forth in the "Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in					

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California Central Valley."						
If Swainson' Hawks are found to be nesting within 1,000 feet of the project site, nest protection buffers shall be established in consultation with CDFW or as required in any Fish and Game Section 2081 management authorization issued to the project by CDFW.						
Section 3.4—Cultural Resources						
MM CUL-1: If prehistoric or historic-period archaeological resources are encountered, all construction activities within 100 feet of the find shall halt. Prehistoric archaeological materials may include obsidian and chert flakedstone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone, concrete, or adobe footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. A Secretary of the Interior-qualified archaeologist shall inspect the findings within 24 hours of discovery. If it is determined that the project could damage a historical resource or a unique archaeological resource (as defined pursuant to the CEQA Guidelines), mitigation shall be implemented in accordance with PRC Section 21083.2 and Section 15126.4 of the CEQA Guidelines, with a preference for preservation in place. Consistent with Section 15126.4(b)(3), this may be accomplished through planning construction to avoid the resource; incorporating the resource within open space; capping and covering the resource; or deeding the site into a permanent conservation easement. If avoidance is not	Submittal of documentation; Notes on construction plans; Site inspection	During construction (if prehistoric or historic-period archaeological resources are encountered)	Napa Vallejo Waste Management Authority			

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feasible, a qualified archaeologist shall prepare and implement a detailed treatment plan. Treatment of unique archaeological resources shall follow the applicable requirements of PRC Section 21083.2. Treatment for most resources would consist of (but would not be not limited to) sample excavation, artifact collection, site documentation, and historical research, with the aim to target the recovery of important scientific data contained in the portion(s) of the significant resource to be impacted by the Project. The treatment plan shall include provisions for analysis of data in a regional context, reporting of results within a timely manner, curation of artifacts and data at an approved facility, and dissemination of reports to local and state repositories, libraries, and interested professionals.					
MM CUL-3: If potential fossils are discovered during project implementation, all earthwork or other types of ground disturbance within 100 feet of the find shall stop immediately until a qualified professional paleontologist can assess the nature and importance of the find. The paleontologist shall report his or her findings to the City of American Canyon. Based on the scientific value or uniqueness of the find, the paleontologist shall either record the find and recommend that the City of American Canyon allow work to continue, or recommend salvage and recovery of the fossil. The paleontologist, if required, shall propose modifications to the stop-work radius based on the nature of the find, site geology, and the activities occurring on the site. If treatment and salvage is required, recommendations will be consistent with Society of Vertebrate Paleontology guidelines and currently accepted scientific practice. If required, treatment for fossil remains shall include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection, and, if required, shall also include preparation of a	Submittal of documentation; Notes on construction plans; Site inspection	During construction (if potential fossils are discovered)	Napa Vallejo Waste Management Authority		

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report for publication describing the finds.					
MM CUL-4: In the event of discovery or recognition of any human remains during construction activities, such activities within 100 feet of the find shall cease until the Napa County Coroner has been contacted to determine that no investigation of the cause of death is required. The Native American Heritage Commission (NAHC) shall be contacted within 24 hours if it is determined that the remains are Native American. The NAHC will then identify the person or persons it believes to be the most likely descendant from the deceased Native American (PRC Section 5097.98), who in turn would make recommendations to NVWMA for the appropriate means of treating the human remains and any associated funerary objects (CEQA Guidelines Section 15064.5(d)).	Submittal of documentation; Notes on construction plans; Site inspection	During construction (in the event of discovery or recognition of any human remains)	Napa Vallejo Waste Management Authority		
Section 3.5—Geology, Soils, and Seismicity					
MM GEO-1: Prior to construction, NVWMA shall retain a qualified consultant to prepare a design-level Geotechnical Investigation. The investigation shall be prepared by a qualified engineer and identify grading and building practices necessary to achieve compliance with the latest adopted edition of the California Building Standards Code geologic, soils, and seismic requirements, including abatement of expansive soil conditions. The report shall also determine the final design parameters for walls, foundations, foundation slabs, and surrounding related improvements (e.g., utilities roadways, parking lots, and sidewalks). The measures identified in the approved report shall be incorporated into the project plans and all applicable construction-related permits.	Approval of plans	Prior to construction	Napa Vallejo Waste Management Authority		

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Section 3.6—Hazards and Hazardous Materials						
MM HAZ-1a: Prior to construction, all contractor and subcontractor personnel shall receive training regarding the appropriate work practices necessary to effectively comply with the applicable environmental laws and regulations, including, without limitation, hazardous material spill prevention and response measures.	Submittal of documentation	Prior to construction	Napa Vallejo Waste Management Authority			
MM HAZ-1c: During construction and operations, hazardous materials shall not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment shall be provided for all trash. All hazardous construction waste shall be removed to a hazardous waste facility permitted or otherwise authorized to treat, store, or dispose of such materials.	Notes on construction plans; Site inspection	During construction and operations	Napa Vallejo Waste Management Authority			

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Section 3.7—Hydrology and Water Quality						
MM HYD-1a: Prior to grading, NVWMA shall retain a qualified consultant to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of the statewide Construction General Permit. The SWPPP shall be designed to address the following objectives: (1) all pollutants and their sources, including sources of sediment associated with construction, construction site erosion, and all other activities associated with construction activity are controlled; (2) where not otherwise required to be under a Regional Water Quality Control Board permit, all non-stormwater discharges are identified and either eliminated, controlled, or treated; (3) site best management practices (BMPs) are effective and result in the reduction or elimination of pollutants in stormwater discharges and authorized non-stormwater discharges from construction activity; and (4) stabilization BMPs are installed to reduce or eliminate pollutants after construction are completed. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include the minimum BMPs required for the identified Risk Level. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association Stormwater Best Management Handbook-Construction or the Caltrans Stormwater Quality Handbook Construction Site BMPs Manual.	Approval of plan; Notes on construction plans; Site inspection	Prior to grading	Napa Vallejo Waste Management Authority			

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MM HYD-1b: Prior to grading, NVWMA shall retain a qualified consultant to prepare a Stormwater Control Plan that includes post-construction stormwater controls in the site design to satisfy requirements of the Phase II Small MS4 Permit. Provision E.12.h of the MS4 Permit requires that an operation and maintenance program be implemented for post-construction stormwater management features. Responsible parties and funding for long-term maintenance of all BMPs must be specified. This plan shall specify a regular inspection schedule of stormwater treatment facilities in accordance with the requirements of the MS4 Permit. Reports documenting inspections and any remedial action conducted shall be submitted regularly to the City for review and approval.	Approval of plan	Prior to grading	Napa Vallejo Waste Management Authority		
Section 3.9—Noise	I	T	ı	I	
 MM NOI-1b: During construction activities, the following noise abatement measures shall be implemented: Construction activities involving the use of heavy equipment or loud tools shall be limited to the hours between 7:00 a.m. and 7:00 p.m., seven days a week. Construction activities that occur indoors or that do not involve the use of heavy equipment or loud tools may occur outside of these hours provided that they do not exceed 60 dB at the closest single-family residence. The City of American Canyon shall have the discretion to permit construction activities to occur outside of allowable hours if compelling circumstances warrant such an exception (e.g., weather conditions necessary to pour concrete). All construction equipment shall use noise-reduction features (e.g., mufflers and engine shrouds) that are no less effective than those originally installed by the manufacturer. If no noise reduction features were installed by the 	Notes on construction plans; Site inspection	During construction activities	Napa Vallejo Waste Management Authority		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
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 manufacturer, then the contractor shall require that at least a muffler be installed on the equipment. Construction staging and heavy equipment maintenance activities shall be performed a minimum distance of 100 feet from the single-family residence, unless safety or technical factors take precedence (e.g., a heavy equipment breakdown). 					
Section 3.11—Transportation			'		
MM TRANS-9: NVWMA shall retain a qualified consultant to prepare a Construction Management Plan (CMP) prior to commencement of any construction activities, including construction activities associated with the transportation mitigation measures. The provisions of a CMP shall specifically address the characteristics of construction-related traffic associated with development. Such plans identify construction phasing and the level and type of construction-related traffic. The CMP shall identify construction truck routes to access the project site, lane closures on existing public streets (if needed) including a plan for any necessary traffic control measures, and on-site staging requirements.	Approval of plan; Notes on construction plans; Site inspection	Prior to construction activities	Napa Vallejo Waste Management Authority		
NVWMA shall be responsible for repairing damage to roadways used for construction vehicle access to the site and attributable to the project so that the roadway conditions are returned to their pre-construction conditions (or better) as documented in the pre-construction survey along the truck routes following the construction of the project.					