



Recycled Water Reservoir Improvements Project

Final Initial Study/Mitigated Negative Declaration



December 2016



Napa Sanitation District Recycled Water Reservoir Improvements Project

Final Initial Study / Mitigated Negative Declaration
SCH # 2016112046

Prepared by:



SMB Environmental, Inc.

December 2016

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Chapter 1 Introduction

Pursuant to the California Environmental Quality Act (CEQA; Public Resources Code Section 21000, et seq. and CEQA Guidelines), the Napa Sanitation District (District) prepared a Public Draft Initial Study/Mitigated Negative Declaration (IS/MND) to evaluate potential environmental impacts associated with the District's proposed Recycled Water Reservoir Improvements Project (Proposed Project).

The Napa Sanitation District (District) is located in the Napa Valley and provides wastewater collection, treatment and disposal services to the residents and businesses in the City of Napa and surrounding unincorporated areas of Napa County. Wastewater from the City of Napa and surrounding unincorporated areas in Napa County goes through a complex series of steps to remove contaminants at the Soscot Water Recycling Facility (SWRF), which is a state-of-the-art wastewater treatment and water recycling plant. These steps include removal of solid, floating and dissolved materials, removal of waste by microorganisms, followed by filtration and chlorination. The water receives tertiary treatment, making it safe for reuse as recycled water. Recycled water is now used to irrigate golf courses, vineyards, parks and pastureland. The primary purpose of the Proposed Project/Action is to install reservoir liners to increase the efficiency of the District's two existing reservoirs by operating the reservoirs at full capacity without experiencing leaking.

On November 16, 2016, to initiate public review of the Draft IS/MND, the District filed a Notice of Completion (NOC) for the project with the Governor's Office of Planning and Research (State Clearinghouse or SCH) and a Notice of Availability (NOA) with the County of Napa and released the Draft IS/MND for a 30-day public review. The State Clearinghouse identified the project with SCH #2016112046. The 30-day public review period was established between November 17 and December 19, 2016, with copies of the Draft IS/MND available for review on the District's website at www.napasan.com and at the addresses below:

Napa Sanitation District
1515 Soscot Ferry Road
Napa, CA 94558

Napa County Library
580 Coombs Street
Napa, CA 94558

This Final IS/MND was prepared according to CEQA Guidelines and considers and incorporates all comments received by the State Clearinghouse and other agencies during the 30-day public review period. The purpose of this document is to clarify facts set forth in the Public Draft IS/MND, as necessary, to ensure accuracy. The District must consider the IS/MND, together with any comments received, before approving the Proposed Project (Public Resources Code Section 21091(f); and CEQA Guidelines Section 15074). The District has no affirmative duty to prepare formal responses to comments on the Public IS/MND, but should have adequate information on the record explaining why the comment(s) do/does not affect the conclusion that there are no potential significant environmental effects. The District is required to, however, notify, in writing, any commenting agencies of the date of the meeting on the Proposed Project for which an IS/MND is prepared and will be decided upon for approval (Public Resources Code Section 21092.5(b); and CEQA Guideline Section 15073).

This Final IS/MND is being distributed to agencies, stakeholder organizations, and individuals who commented on the Public Draft IS/MND to ensure that interested parties have an opportunity to express their views regarding the environmental impacts of the project, and to ensure that information pertinent to permits and approvals is provided to decision makers for the District and CEQA responsible agencies. Comments from the public have been incorporated into the Final IS/MND for the District's Board of Directors (Board) to consider whether to approve the Proposed Project. **The District is scheduled to**

make a final decision on the Proposed Project at its regularly scheduled Board Meeting on January 11, 2017 at 4:00 p.m. in the Board Chambers, 1515 Soscol Ferry Road, Napa CA 94558.

Chapter 2 Comments Received

During the 30-day public review period (November 17 through December 19, 2016, the District received a total of one (1) comment letter(s) on the Proposed Project. The District has reviewed and considered all of the comments received as follows in Table 2-1 below. The letter(s) are attached.

TABLE 2-1 AGENCY COMMENT LETTERS RECEIVED		
Date	Commenting Agency	Comment Letter
December 19, 2016	Patricia Maurice, District Branch Chief Department of Transportation, District 4 Office of Transit and Community Planning P.O. Box 23660, MS-10D Oakland, CA 94623-0660	A

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

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*Serious Drought.
Help save water!*

Comment Letter A

December 19, 2016

SCH # 2016112046

GTS # 04-NAP-2016-00030

NAP-29- R6.188

Mr. Lemmon
Engineering Services
Napa Sanitation District
1515 Soscol Ferry Road
Napa, CA 94558-0522

Napa Sanitation District Recycled Water Reservoir Improvements Project– Initial Study/Mitigated Negative Declaration

Dear Mr. Lemmon:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Napa Sanitation District Recycled Water Reservoir Improvements Project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), the Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the Initial Study/Mitigated Negative Declaration (IS/MND) dated November 2016.

A-1

Project Understanding

The primary purpose of the proposed project/action is to install reservoir liners to increase the efficiency of the district's two existing reservoirs by operating the reservoirs at full capacity without experiencing leaking. The proposed project/action proposes to install reservoir liners that will maximize and reestablish the useful volume of the existing reservoirs and provide approximately 3 million gallons of restored treated water storage to increase reliability during periods of peak demand. The project site is accessible via State Route 29 through Soscol Ferry Road and is located 1.2 miles from the SR 29/Soscol Ferry Road intersection. The proposed project would be constructed entirely within the District's wastewater treatment plant, and parking for workers and construction equipment would be provided on-site.

A-2

Cultural Resources

There is no Native American consultation documented in the IS-MND. Though Native American contact letters are documented in Appendix D, the letters do not specify the regulatory context under which the lead agency is requesting to consult. In accordance with CEQA and Assembly Bill (AB) 52, it is recommended that the Napa Sanitation District conduct Native American consultation with tribes, groups, and individuals who are interested in the project area and may have knowledge of Tribal Cultural Resources, Traditional Cultural Properties, or other sacred sites. The entire cultural resource investigation report, attached as Appendix D, is confidential because it provides information about vulnerable cultural resources. This document should be restricted from public access per California Government Code sections 6254.10 and 6254(r); California Code of Regulations Section 15120(d); and Section 304 of the National Historic Preservation Act of 1966. The cultural resources investigation report describes environment of the Area of Potential Effects (APE), but does not provide a defined or mapped boundary of the area per 36 CFR 800.4(a)(1) and 36 CFR 800.16(d).

A-3

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jannette Ramirez at 510-286-5535 or jannette.ramirez@dot.ca.gov.

Sincerely,



PATRICIA MAURICE
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Mr. Lemmon, Napa Sanitation District

December 19, 2016

Page 3

bc: PMaurice/JRamirez/EDarko

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Water Reservoir Improvement Project\04-NAP-2016-00030-29-ISMND-Napa Sanitation
District-20161219.docx

Chapter 3 Responses to Comments

This chapter evaluates the comments received during the 30-day public review period (November 17 through December 19, 2016). The District only received one (1) comment letter. The District has reviewed and considered all of the comments received and provides a response to each of those comments as provided for below.

COMMENT LETTER A – DEPARTMENT OF TRANSPORTATION (CALTRANS)

Comment A-1. Comment Noted. Thank you for your letter. We understand that, in tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), the Caltrans' mission signals a modernization of your approach to evaluate and mitigate impacts to the State Transportation Network (STN). Further, we understand that Caltrans' *Strategic Management Plan* aims to reduce Vehicle Miles Travelled (VMT) by tripling bicycle and doubling both pedestrian and transit travel by 2020.

Comment A-2. Comment Noted. Yes, Caltrans fully understands the purpose of the Proposed Project. Specifically, The primary purpose of the proposed project/action is to install reservoir liners to increase the efficiency of the district's two existing reservoirs by operating the reservoirs at full capacity without experiencing leaking. The Proposed Project/Action proposes to install reservoir liners that will maximize and reestablish the useful volume of the existing reservoirs and provide approximately 3 million gallons of restored treated water storage to increase reliability during periods of peak demand. The project site is accessible via State Route 29 through Soscol Ferry Road and is located 1.2 miles from the SR 29/Soscol Ferry Road intersection. The proposed project would be constructed entirely within the District's wastewater treatment plant, and parking for workers and construction equipment would be provided on-site.

Comment A-3. Comment Noted. The District has conducted consultation with the local Native American Tribe's in accordance with CEQA, Section 106 of the National Historic Preservation Act (NHPA), and Assembly Bill 52. Specifically, on September 15, 2016, we contacted the Native American Heritage Commission (NAHC) in Sacramento in an effort to determine whether any sacred sites listed on its Sacred Lands File are within the current project APE. A response from the NAHC was received on September 29, 2016, stating that a search of its Sacred Land File failed to indicate the presence of Native American cultural resources in the immediate project APE. Included with the response was a list of four (4) Native American representatives who may have further knowledge of Native American resources within or near the project APE. To ensure that all Native American concerns are adequately addressed, letters to each of the listed tribal contacts were sent on September 29, 2016, requesting any information about the project that these individuals may have. Follow-up contacts were made on October 21, 2016. As of this date, we only received one letter back from the Yocha Dehe Wintun Nation, dated October 31, 2016, stating that they may have an interest in the Project and to keep them informed. On November 17, 2016, we sent the Tribe a response and a link as to where they could get a copy of the IS/MND and the Cultural Resources Investigation Report. We also indicated that we would welcome any comments that they may have and at the end of the public comment period we would meet with them and take them on a site visit if they wanted. To this date, we have not heard back from them.

In addition, a record search at the Northwest Information Center (NWIC File #16-0376, October 2016) included the recycled water reservoirs and a 1/2-mile radius around them. No cultural resources are known within the project area. Five cultural resources are located within the 1/2-mile radius, including:

- P-28-000001 (CA-NAP-860/H) is the site of the Thompson estate, orchards, and mansion, developed in the 1850s and burned in the early 20th century. A house constructed in 1910 is still

standing. The site also has a prehistoric element indicated by dark soils and obsidian flakes at the highest part of the site. The site is located 150-feet east of the project area.

- P-28-000467 is the remains of Thompson's Wharf (also called Soscol Wharf), which dates to the 1850s. The site consists of pilings visible in the Napa River, about ¼ mile northwest of the project area.
- P-28-000966 (CA-NAP-1113H) is the Southern Pacific railroad line that passes through the Soscol Water Recycling Facility. It was completed in 1865 as the Napa Valley Rail Road.
- P-28-001186 is a group of stone bridges and landscape features across the Napa River from the project area.
- P-28-001659 is Napa Sanitation District Building P-1, located 750 feet northwest of the project area.

The entire project area was previously surveyed in 1991 as part of the Napa Sanitation District Master Plan Update (S-012429, Mikkelsen et al. 1991). The Southern Pacific railroad corridor was studied in 1994 for a pipeline project and again in 2006 for a fiber optic cable installation project (S-016063, Origer 1994; S-033061, Sikes et al. 2006). Finally, a 2003 study examined a pipeline corridor leading from the project area (S-043823; Jones & Stokes 2003). In addition, 14 other studies have covered areas within 1/2 mile of the project area.

Project Staff also reviewed the National Register of Historic Places, the California Register of Historic Resources, California Historical Landmarks, and the California Inventory of Historical Resources to determine whether any previously recorded cultural resources exist within the project area. In the scope of that review, none were found.

The project area was surveyed on October 14, 2016 by Dr. Daniel D. Shoup, a Registered Professional Archaeologist with over 5 years of experience in California archaeology. The project area consists of a clay embankment and concrete reservoirs constructed in the 1990s. Figure 3 provides an aerial view of the existing reservoirs, the limits of the Proposed Project/Action Study Area, and known adjacent cultural resources. The Proposed Project/Action would not affect these resources and no cultural resources were observed in the Proposed Project/Action Study Area.

We agree that the sensitive portions of the record search should be restricted from public access per California Government Code sections 6254.10 and 6254(r); California Code of Regulations Section 15120(d); and Section 304 of the National Historic Preservation Act of 1966. As a result, we did not include those records in the document.

Finally, Figure 3 in the IS/MND and Figure 3 in the Section 106 Cultural Resources Investigation Report provides an illustration as well as an adequate description of the Area of Potential Effect (APE) per 36 CFR 800.4(a)(1) and 36 CFR 800.16(d).

Chapter 4 Revisions to the Public Draft IS/MND

This chapter shows revisions to the November 2016 Public Draft IS/MND, subsequent to the document's publication and public review. The revisions are presented in the order in which they appear in the Public Draft IS/MND and are identified by section and page number in respective chapters. These revisions are shown as excerpts from the Public Draft IS/MND, with strikethrough (~~strikethrough~~) text in indicate deletions and underlined (underlined) text to indicate additions.

The District does not have any revisions to the Public Draft IS/MND.

Chapter 5 CEQA Findings and Determination:

On the basis of this Final IS/MND for the Napa Sanitation District's Recycled Water Reservoir Improvements Project:

- ☐ I find that the Proposed Project WOULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the Proposed Project COULD have a significant effect on the environment, there will NOT be a significant effect in this case because revisions in the Project and/or mitigation measures have been made by or agreed to by the District. As a result, a MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the Proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

Signature

Date

Timothy B. Healy
Printed Name

General Manager
Title

Attachment A

Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM

**Napa Sanitation District
Recycled Water Reservoir Improvements Project (2016)
Final Initial Study / Mitigated Negative Declaration**

SCH # 2016112046

Prepared for:

Napa Sanitation District
1515 Soscol Ferry Road
Napa, CA 94558

Prepared by:



SMB Environmental, Inc.

December 2016

INTRODUCTION

Pursuant to the California Environmental Quality Act (CEQA; Public Resources Code Section 21000, et seq. and CEQA Guidelines), the Napa Sanitation District (District) prepared a Public Draft Initial Study/Mitigated Negative Declaration (IS/MND) to evaluate potential environmental impacts associated with the District's proposed Recycled Water Reservoir Improvements Project (Proposed Project/Action).

The Napa Sanitation District (District) is located in the Napa Valley and provides wastewater collection, treatment and disposal services to the residents and businesses in the City of Napa and surrounding unincorporated areas of Napa County. Wastewater from the City of Napa and surrounding unincorporated areas in Napa County goes through a complex series of steps to remove contaminants at the Soscot Water Recycling Facility (SWRF), which is a state-of-the-art wastewater treatment and water recycling plant. These steps include removal of solid, floating and dissolved materials, removal of waste by microorganisms, followed by filtration and chlorination. The water receives tertiary treatment, making it safe for reuse as recycled water. Recycled water is now used to irrigate golf courses, vineyards, parks and pastureland. The primary purpose of the Proposed Project/Action is to install reservoir liners to increase the efficiency of the District's two existing reservoirs by operating the reservoirs at full capacity without experiencing leaking.

CEQA Guidelines require public agencies to adopt a Mitigation Monitoring and Reporting Program (MMRP) for changes to the project, which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. A MMRP is required for the proposed project because the IS/MND identifies potentially significant adverse impacts related to project implementation, and mitigation measures have been identified to reduce those impacts.

On November 16, 2016, to initiate public review of the Draft IS/MND, the District filed a Notice of Completion (NOC) for the project with the Governor's Office of Planning and Research (State Clearinghouse or SCH) and a Notice of Availability (NOA) with the County of Napa and released the Draft IS/MND for a 30-day public review. The State Clearinghouse identified the project with SCH #2016112046. The 30-day public review

period was established between November 17 and December 19, 2016, with copies of the Draft IS/MND available for review on the District's website at www.napasan.com, the District's front desk at 1515 Soscot Ferry Road, Napa, CA 94558 and the Napa County Library, 580 Coombs Street, Fairfield, CA 94558.

In November 2016, the District prepared a Final IS/MND according to CEQA Guidelines and only received one (1) comment letter during the 30-day public review period and has considered all comments received. Based on the Final IS/MND, the Proposed Project/Action would not result in new significant impacts, substantially increase the severity of previously disclosed impacts, or involve any of the other conditions related to changed circumstances or new information that can require a subsequent or supplemental EIR under Public Resources Code section 21166 and CEQA Guidelines section 15162 beyond those impacts and conditions already identified in the District's Public Draft IS/MND.

PURPOSE OF MITIGATION MONITORING AND REPORTING PROGRAM

This MMRP has been prepared to ensure that all required mitigation measures are implemented and completed in a satisfactory manner before and during project construction and operation. The MMRP may be modified by the District during project implementation, as necessary, in response to changing conditions or other refinements. Table A (included at the end of this document) has been prepared to assist the responsible parties in implementing the mitigation measures. The table identifies individual mitigation measures, monitoring/mitigation timing, responsible person/agency for implementing the measure, monitoring and reporting procedure, and space to confirm implementation of the mitigation measures. The numbering of mitigation measures follows the numbering sequence found in the Public Draft IS/MND.

ROLES AND RESPONSIBILITIES

Unless otherwise specified herein, the District is responsible for taking all actions necessary to implement the mitigation measures under its jurisdiction according to the specifications provided for each measure and for demonstrating that the action has been successfully completed. The District, at its discretion, may delegate implementation responsibility or portions

thereof to a licensed contractor or other designated agent. The District would be responsible for overall administration of the MMRP and for verifying that District staff members and/or the construction contractor has completed the necessary actions for each measure.

The District would designate a project manager to oversee implementation of the MMRP. The District is primarily responsible for implementing the mitigation measures for the Proposed Project as described in this MMRP. Duties of the project manager include the following:

- Ensure that routine inspections of the construction site are conducted by appropriate District staff; check plans, reports, and other documents required by the MMRP; and conduct report activities.
- Serve as a liaison between the District and the contractor or project applicant regarding mitigation monitoring issues.
- Complete forms and maintain reports and other records and documents generated by the MMRP.
- Coordinate and ensure that corrective actions or enforcement measures are taken, if necessary.

The responsible party for implementation of each item shall identify the staff members responsible for coordinating with the District on the MMRP.

REPORTING

The District's Project Manager shall prepare a monitoring report, upon completion of the project, on the compliance of the activity with the required mitigation measures. Information regarding inspections and other requirements shall be compiled and explained in the report. The report shall be designed to simply and clearly identify whether mitigation measures have been adequately implemented. At a minimum, each report shall identify the mitigation measures or conditions to be monitored for implementation, whether compliance with the mitigation measures or conditions has occurred, the procedures used to assess compliance, and whether further action is required. The report shall be presented to the District's Board of Directors.

MITIGATION MONITORING AND REPORTING PLAN TABLE

The categories identified in Table A are described below.

- **Mitigation Measure** – This column provides the text of the mitigation measures identified in the IS/MND.
- **Timing** – This column identifies the time frame in which the mitigation will take place.
- **Implementation** – This column identifies the party responsible for implementing compliance with the requirements of the mitigation measure
- **Enforcement** – This column identifies the party responsible for enforcing compliance with the requirements of the mitigation measure.
- **Dated Signature for Verification of Compliance** – This column is to be dated and signed by the person (either project manager or his/her designee) responsible for verifying compliance with the requirements of the mitigation measure.

Table A
Mitigation Monitoring and Reporting Plan for the Napa Sanitation District's Recycled Water Reservoir Improvements Project IS/MND

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
3.3 AIR QUALITY				
<p>Mitigation Measure AIR-1: Basic Construction Mitigation Measures Recommended for ALL Proposed Projects. During all phases of construction, the following procedures shall be implemented:</p> <p>All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</p> <p>All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</p> <p>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.</p> <p>All vehicle speeds on unpaved roads shall be limited to 15 mph.</p> <p>All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible.</p> <p>Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as 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.</p> <p>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.</p> <p>Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.</p>	Prior to construction of The Proposed Project/Action.	Napa Sanitation District	Napa Sanitation District Bay Area Air Quality Management District	
<p>Mitigation Measure AIR-2: Additional Construction Mitigation Measures for Projects with Emissions over the Thresholds. During all phases of construction, the following procedures shall be implemented as appropriate:</p>	Prior to construction of The Proposed Project/Action.	Napa Sanitation District	Napa Sanitation District Bay Area Air Quality Management District	

¹ The Napa Sanitation District's General Manager is primarily responsible for implementing the mitigation measures for the Proposed Project/Action as described in this MMRP.

Table A
Mitigation Monitoring and Reporting Plan for the Napa Sanitation District's Recycled Water Reservoir Improvements Project IS/MND

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<ul style="list-style-type: none"> • All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph. • Windbreaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Windbreaks should have at maximum 50 percent air porosity. • Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established. • The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time. • All trucks and equipment, including their tires, shall be washed off prior to leaving the site. • Site accesses to a distance of 100 feet from the paved road shall be treated with a 6 to 12 inch compacted layer of wood chips, mulch, or gravel. • Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent. • Minimizing the idling time of diesel powered construction equipment to five (5) minutes. • To the extent possible or as appropriate, the project shall develop a plan demonstrating that if any off-road equipment (more than 50 horsepower) is to be used in the construction of the project (i.e., owned, leased, and subcontractor vehicles), said equipment would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent Air Resources Board (ARB) fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available. 				

Table A
Mitigation Monitoring and Reporting Plan for the Napa Sanitation District's Recycled Water Reservoir Improvements Project IS/MND

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
<ul style="list-style-type: none"> To the extent possible or as appropriate, use low volatile organic compounds (VOC) (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings). To the extent possible or as appropriate, require that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM. To the extent possible or as appropriate, require that all contractors use equipment that meets the California Air Resources Board's (CARB) most recent certification standard for off-road heavy-duty diesel engines. 				
3.4 BIOLOGICAL RESOURCES				
<p>Mitigation Measure BIO-1: Conduct Breeding Surveys. For any new construction activities that occur between February 1 and August 31, preconstruction breeding bird surveys shall be conducted by a qualified biologist prior to and within 10 days of any initial ground-disturbance activities. Surveys shall be conducted within all suitable nesting habitat within 250 feet of the activity. All active, non-status passerine nests identified at that time shall be protected by a 50-foot radius minimum exclusion zone. Active raptor or special-status species nests shall be protected by a buffer with a minimum radius of 200 - feet. CDFW and USFWS recommend that a minimum 500-foot exclusion buffer be established around active special status species nests. The following considerations apply to this mitigation measure:</p> <ul style="list-style-type: none"> Survey results are valid for 14 days from the survey date. Should ground disturbance commence later than 14 days from the survey date, surveys should be repeated. If no breeding birds are encountered, then work may proceed as planned. Exclusion zone sizes may vary, depending on habitat characteristics and species, and are generally larger for raptors and colonial nesting birds. Each exclusion zone would remain in place until the nest is abandoned or all young have fledged. The non-breeding season is defined as September 1 to January 31. During this period, breeding is not occurring and surveys are not required. However, if nesting birds are encountered during work activities in the non-breeding season, disturbance activities within a minimum of 50-feet of the nest should be postponed until the nest is abandoned or young birds have fledged. 	Prior to and during construction of the Proposed Project/Action.	Napa Sanitation District	Napa Sanitation District California Department of Fish and Wildlife U.S. Fish and Wildlife Service	
Mitigation Measure BIO-2: Conduct Nesting Surveys. For any construction	Prior to and during	Napa Sanitation District	Napa Sanitation District	

Table A
Mitigation Monitoring and Reporting Plan for the Napa Sanitation District's Recycled Water Reservoir Improvements Project IS/MND

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
activities initiated between February 1 and August 31, surveys for nesting special status species (including swallows and raptors) are required within 250-feet of areas of disturbance. If an active nest is found, a qualified biologist shall monitor the nest during construction activities within 250-feet of the nest to determine whether project construction may result in abandonment. The biologist shall continue monitoring the nest until construction within 250-feet of the nest is completed, or until all chicks have completely fledged. If the monitor determines that construction may result in abandonment of the nest, all construction activities within 250-feet shall be halted until the nest is abandoned or all young have fledged.	construction of the Proposed Project/Action.			
3.5 CULTURAL RESOURCES				
Mitigation Measure CR-1: Halt work if cultural resources are discovered. In the event that any prehistoric or historic subsurface cultural resources are discovered during ground disturbing activities, all work within 100 feet of the resources shall be halted and after notification, the District shall consult with a qualified archaeologist to assess the significance of the find. If any find is determined to be significant (CEQA Guidelines 15064.5[a][3] or as unique archaeological resources per Section 21083.2 of the California Public Resources Code), representatives of the District and a qualified archaeologist shall meet to determine the appropriate course of action. In considering any suggested mitigation proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the lead agency shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (e.g., data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical resources or unique archaeological resources is carried out.	Upon discovery of cultural resources	Napa Sanitation District	Napa Sanitation District	
Mitigation Measure CR-2: Stop work if paleontological remains are discovered. If paleontological resources, such as fossilized bone, teeth, shell, tracks, trails, casts, molds, or impressions are discovered during ground-disturbing activities, work will stop in that area and within 100 feet of the find until a qualified paleontologist can assess the significance of the find and, if necessary, develop appropriate treatment measures in consultation with the District.	Before and during ground-disturbing activities.	Napa Sanitation District	Napa Sanitation District	
Mitigation Measure CR-3: Halt work if human remains are found. If human remains are encountered during excavation activities conducted for the Proposed Project/Action, all work in the adjacent area shall stop immediately and the Napa County Coroner's office shall be notified. If the Coroner determines that the remains are Native American in origin, the Native American Heritage	Upon the discovery of suspected human remains.		Napa Sanitation District For actions taken to satisfy the requirements of Section 106: the State Historic	

Table A
Mitigation Monitoring and Reporting Plan for the Napa Sanitation District's Recycled Water Reservoir Improvements Project IS/MND

Mitigation Measure	Timing	Implementation ¹	Enforcement ¹	Dated Signature for Verification of Compliance
Commission shall be notified and will identify the Most Likely Descendent, who will be consulted for recommendations for treatment of the discovered human remains and any associated burial goods.			Preservation Office (SHPO)	
3.7 HAZARDS AND HAZARDOUS MATERIALS				
Mitigation Measure HAZ-1: Store, Handle, Use Hazardous Materials in Accordance with Applicable Laws. The District shall ensure that all construction-related and operational hazardous materials and hazardous wastes shall be stored, handled, and used in a manner consistent with relevant and applicable federal, state, and local laws. In addition, construction-related and operational hazardous materials and hazardous wastes shall be staged and stored away from stream channels and steep banks to keep these materials a safe distance from near-by residents and prevent them from entering surface waters in the event of an accidental release.	Prior to construction and operation of the Proposed Project/Action	Napa Sanitation District	Napa Sanitation District	
Mitigation Measure HAZ-2: Properly Dispose of Contaminated Soil and/or Groundwater. If contaminated soil and/or groundwater is encountered or if suspected contamination is encountered during project construction, work shall be halted in the area, and the type and extent of the contamination shall be identified. A contingency plan to dispose of any contaminated soil or groundwater will be developed through consultation with appropriate regulatory agencies.	Prior to construction and operation of the Proposed Project/Action	Napa Sanitation District	Napa Sanitation District	