6. MITIGATION MONITORING AND REPORTING PROGRAM

The Mitigation Monitoring and Reporting Program (MMRP) for the Napa Sanitation District (NapaSan) 66-inch Sewer Rehabilitation Project has been prepared in accordance with Public Resources Code Section 21081.6 and State CEQA Guidelines Section 15091(d). The MMRP incorporates all mitigation measures adopted for the proposed Project. NapaSan will use this MMRP to track compliance with the Project mitigation measures adopted for the proposed Project. The NapaSan Board of Directors will consider the MMRP during the certification hearing for the IS/MND.

Table 6-1 provides the MMRP and lists mitigation measures, monitoring and reporting activities, monitoring timing, and responsible agency/entity for implementation. The mitigation measures have been incorporated into the Project design and would be implemented before, during, or after construction in accordance with the MMRP, thereby, reducing all identified potential environmental impacts to a less than significant level. Mitigation measures are presented in the same order as in the IS/MND.

Table 6-1: Mitigation Monitoring and Reporting Program for the Napa Sanitation District 66-inch Sewer Rehabilitation Project

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
Air Quality				
Mitigation Measure (MM) AQ-1: Tier 4 Rated Engines Napa Sanitation District shall require the construction Contractor to use off-road equipment that meets the USEPA certified Tier 4 final engines or engines that are certified to meet or exceed the emission ratings for USEPA Tier 4 final or interim engines such that average daily NOX emissions are lower than BAAQMD threshold of significance of 54 lbs/day. One way for this to be accomplished would be for at least 60 percent of the construction equipment and vehicles used for the Project to be equipped with Tier 4 final engines.	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. Monitor construction activities to verify that measure is implemented during construction 3. Retain construction monitoring report in the project file	1. Contracting 2. Construction 3. Post-construction	1._____ 2._____ 3._____
Biological Resources				
MM BIO 1A: Wetland Avoidance Excavation of all wetlands shall be avoided to the extent feasible, with the maximum buffer feasible. If excavation of wetlands cannot be avoided, avoidance and minimization measures listed in Mitigation Measure BIO 1B shall be utilized. If feasible, equipment used for the excavation of wetlands shall remain in developed or ruderal areas.	NapaSan and Construction Contractor	1. Confirm that contract documents include mitigation measure 2. Monitor construction activities to verify that measure is implemented during construction	1. Contracting 2. Construction	1._____ 2._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
MM BIO 1B: Wetland Permits NapaSan shall obtain a Clean Water Act (CWA) Section 404 permit from the US Army Corps of Engineers (USACE) and a CWA Section 401 Certification from the Regional Water Quality Control Board (RWQCB). Permit conditions will be incorporated into the Project, and shall be followed. Permit conditions may include that functions and values of impacted wetlands to be restored to equal or better than existing wetland, with monitoring and performance criteria to be developed and approved to know when restoration has been satisfactorily achieved. The following avoidance and minimization measures are proposed as a part of the permit applications to reduce impacts described to less than significant: 1. Best management practices shall be employed to reduce impacts to vegetation and to limit erosion. Vegetation removal shall be minimized to the greatest extent feasible. Areas where vegetation is removed should be replanted or seeded with native plants appropriate for the site. Erosion control measures, such as the use of silt fencing or straw wattles, should be installed along edge of aquatic features in areas of ground disturbance or vegetation removal within 50-feet of aquatic features.	NapaSan and Construction Contractor	1. Confirm that contract documents include mitigation measure to obtain CWA Section 404 permit and Section 401 Certification 2. Verify a CWA Section 404 permit and Section 401 Certification are obtained. 3. Verify that avoidance and minimization measures in the permit and certification are implemented during project construction 4. Retain a copy of the Section 404 permit and Section 401 Certification in the project file	1. Contracting 2. Pre-construction 3. Construction 4. Post-construction	1._____ 2._____ 3._____ 4._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
2. To reduce potential temporary impacts to waters in the Study Area, best management practices shall be employed to reduce impacts associated with excavation and grading including erosion and sedimentation. Best management practices recommended by the Napa County Stormwater Pollution Prevention Program shall be implemented to minimize pollutants carried from the Study Area in runoff. The Project shall comply with terms of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit and the California General Construction Storm Water Permit. 3. All staging, maintenance, and storage of construction equipment shall be performed in a manner to preclude any direct or indirect discharge of fuel, oil, or other petroleum products into the drainage channel or salt marsh vegetation. No other debris, rubbish, creosote-treated wood, soil, silt, sand, cement, concrete or washings thereof, or other construction related materials or wastes shall be allowed to enter into or be placed where they may be washed by rainfall or runoff into the drainage channel or salt marsh vegetation. All such debris and waste				

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
shall be picked up daily and properly disposed of at an appropriate site. 4. No equipment shall be operated in areas of flowing or standing water. No fueling, cleaning, or maintenance of vehicles or equipment will take place within any areas where an accidental discharge to the drainage channel or salt marsh vegetation may occur. 5. Disturbance or removal of vegetation shall not exceed the minimum necessary to complete construction. 6. Where areas of bare soil are exposed, sediment and erosion control measures shall be used to prevent sediment from entering waters and wetlands. Sediment and erosion control structures shall be monitored and repaired or replaced as needed. Build-up of soil behind silt fences shall be removed promptly and any breaches or undermined areas repaired promptly. Revegetation of disturbed surfaces shall occur prior to the start of the first rainy season after construction. 7. The work area and sensitive areas shall be clearly demarcated in order to prevent impacts to habitat beyond the work limit and to prevent impacts to habitat within the work area that requires avoidance or clearance by a biological monitor prior to entry. 8. All sewer rehabilitation work shall be conducted during the dry season (April				

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
through October). Disassembly of the bypass system and restoration efforts shall occur following completion of bypass operations or by the end of November. For work conducted outside dry season, above-mentioned BMPs shall be observed where applicable. Where areas of bare soil are exposed during rainy season, erosion control measures (i.e. weed-free straw weighed down with jute fencing, hydroseeding over weed-free straw, etc.) shall be placed at end of each day if precipitation is forecasted. **9.** All excavated wetland areas shall be graded to pre-construction topography and seeded or planted with appropriate wetland plants. **10.** Weighted mats shall be placed over wetlands that are expected to be temporarily impacted through driving or staging of materials.				
MM BIO 1C: Wetlands Buffer The edge of all wetlands within 50 feet of Project Area shall be clearly marked and entry will be avoided. If a 50-foot buffer is not feasible, the edge of the wetland will be clearly marked and entry will be avoided.	NapaSan, and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. Verify that measure is implemented during construction	1. Contracting 2. Construction	1._____ 2._____
MM BIO 2A: Riparian Vegetation A Lake and Streambed Alteration Agreement (LSAA) should be obtained from California Department of Fish and Wildlife [CDFW] prior to construction for temporary impacts to riparian vegetation. Edges of riparian vegetation should be	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. Obtain copy of LSAA, if one was issued from CDFW, and implement conditions of the LSAA.	1. Contracting 2. Pre-construction	1._____ 2._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
clearly flagged where feasible and entry avoided to the greatest extent practical. If entry is unavoidable, appropriate avoidance and minimization measures provided in Mitigation Measure BIO 1B shall be utilized to reduce the temporary impacts.		3. Verify that edges of riparian vegetation are flagged, and appropriate avoidance and minimization measures provided in MM BIO 1B are implemented if entry is unavoidable 4. Retain a copy of the LSAA, if one was issued, in the project file.	3. Construction 4. Post-construction	3._____ 4._____
MM BIO 3A: Special Status Plants A special-status plant survey shall be conducted in May and June to determine presence or absence of the remaining seven species. The surveys shall be conducted by a qualified biologist familiar with the flora of Napa County. The surveys shall be performed in accordance with those outlined by Napa County (2016b), which follow those described by resource experts and agencies (California Native Plant Society [CNPS] 2001, CDFW 2018c, United Stated Fish and Wildlife Service [USFWS] 1996). Should individuals/populations of any special-status species be observed, the location and extent shall be mapped. Notes regarding number of individuals, quality of habitat, and potential threats shall be recorded. This information shall be compiled in a California Natural Diversity Database (CNDDB) occurrence form and submitted to CDFW. Construction activities shall avoid the populations to the greatest	NapaSan and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Verify a special-status plant survey is conducted by a qualified biologist in May and June 3. Verify survey information was compiled in a CNDDB occurrence form and submitted to CDFW 4. If special status individuals/ populations are observed, confirm no-touch buffer(s) is imposed and construction crews are informed 5. Confirm a restoration plan was submittal to Napa County, if applicable 6. Verify that approved measures are implemented during construction 7. Retain a copy of all surveys and reports in the project file	1. Contracting 2. Pre-Construction 3. Pre-Construction 4. Pre-Construction 5. Pre-Construction 6. Construction 7. Post-Construction	1._____ 2._____ 3._____ 4._____ 5._____ 6._____ 7._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
extent practical. A no-touch buffer shall be imposed around each individual/ population. The width of the buffer is species dependent and shall be determined by the qualified biologist. The buffer shall be flagged prior to construction activities. Construction crews shall be informed of the meaning of the flagging and the buffer. If avoidance is not practical, then a restoration plan shall be drafted for each impacted species. The restoration plan shall be submitted to the County for approval, prior to construction activities.				
MM BIO 4A: Salt marsh harvest mouse (SMHM) Prior to Project activities (e.g. vegetation removal, disturbance to vegetation) occurring in potential SMHM habitat each day, an approved qualified biologist, familiar with salt marsh harvest mouse (SMHM), shall walk through and inspect suitable habitat prior to vegetation removal and search for signs of harvest mice or other sensitive wildlife and plants. If a mouse of any kind is discovered, no work shall occur within 150 feet of where the mouse was discovered. Following inspection, personnel, under the supervision of the qualified biologist, will disturb (e.g., lush) vegetation to force movement of SMHM into adjacent marsh areas. Flushing of vegetation will first occur in the center of the site then progress toward the two sides away from the open	NapaSan and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm a suitable SMHM habitat inspection is completed each day by a qualified biologist prior to vegetation disturbance or removal activities 3. If a mouse of any kind is discovered, confirm no work occurs within 150 feet of discovery 4. Confirm vegetation removal is monitored by the qualified biologist and conducted according to the approved mitigation measure 5. Confirm large equipment shall not enter suitable SMHM habitat until all vegetation has been taken down to ground level	1. Contracting 2. Pre-construction 3. Pre-construction 4. Construction 5. Construction	1._____ 2._____ 3._____ 4._____ 5._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
water areas. Immediately following vegetation flushing, personnel, under the supervision of the qualified biologist, will remove vegetation with hand tools (e.g. weed-eater, hoe, rake, trowel, shovel, grazing) so that vegetation is no taller than 2 inches. If string trimmers (a.k.a. weed whackers) are used, they shall be used to the minimum extent necessary and shall be used to take down vegetation height a couple inches at a time so that the biological monitor can search for potential SMHM nests. If a nest is discovered, all work shall stop immediately and CDFW shall be notified. Work shall not resume until CDFW provides written permission to do so. Alternatively, livestock grazing (e.g. sheep) can be used to remove all vegetation to ground level. Vegetation removal shall include a 2-foot wide buffer from the edge of the project site to ensure mice will not enter the project site. Large equipment shall not enter suitable SMHM habitat until all vegetation has been taken down to ground level. If an injured or killed mouse is discovered at any time during Project activities, all work shall cease immediately and CDFW shall be contacted for further direction. A restoration ecologist with documented experience with salt marsh habitat restoration shall monitor the site to ensure that marsh habitat restores naturally to the same coverage rate prior to disturbance. If after 3 years, the site is not revegetated, the restoration ecologist shall		6. If a nest or an injured or killed mouse is discovered during construction activities, confirm that all work ceases and CDFW is notified immediately. Confirm work does not resume until CDFW provides written permission to do so. 7. Confirm a restoration ecologist with documented experience with salt marsh habitat restoration monitors the site to ensure that marsh habitat restores naturally to the same coverage rate prior to disturbance. 8. Verify that all additional measures prescribed for SMHM in Project Permits are implemented during construction 9. If after 3 years, the site is not revegetated, confirm a site restoration plan to revegetate all salt marsh habitat temporarily impacted by the Project is developed by the restoration ecologist	6. Construction 7. Construction 8. Construction 9. Post-construction	6._____ 7._____ 8._____ 9._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
develop a site restoration plan to revegetate all salt marsh habitat temporarily impacted by the Project. Restoration may include hand transplanting of marsh vegetation (e.g. pickleweed) from clean donor areas.				
MM BIO 5A: Bats If trees or buildings need to be removed for the Project, a qualified biologist shall conduct a bat habitat assessment of all trees and/or buildings proposed for removal to determine presence of roosting bats. Any trees containing suitable bat roosting habitat (e.g. cavities, crevices, deep bark fissures) shall be marked and removed using a two-day phased method as follows: On day 1, under the supervision of a qualified biologist, all limbs not containing suitable bat roosting habitat shall be removed using chainsaws only. The next day, the rest of the tree shall be removed. All trees shall be removed during seasonal periods of bat activity: Prior to maternity season – from approximately March 1 (or when night temperatures are above 45°F and when rains have ceased) through April 15 (when females begin to give birth to young); and prior to winter torpor – from September 1 (when young bats are self-sufficiently volant) until about October 15 (before night temperatures fall below 45°F and rains begin). If tree removal must occur outside of these timeframes, a	NapaSan and Qualified Biologist (if trees or buildings need to be removed)	1. Confirm mitigation measure is incorporated into contract documents 2. If trees or buildings need to be removed, confirm a bat habitat assessment of all trees and/or buildings proposed for removal is performed by a qualified biologist 3. If trees need to be removed, confirm any trees containing suitable bat roosting habitat are marked and removed using the two-day phased method in accordance with the mitigation measure 4. If trees need to be removed, confirm trees are removed during the periods of bat activity in accordance with the mitigation measure 5. If trees need to be removed outside of the approved mitigation measure timeframes, confirm trees are surveyed by a qualified biologist to the extent feasible 6. If trees need to be removed outside of the approved mitigation measure	1. Contracting 2. Pre-construction 3. Construction 4. Construction 5. Construction 6. Construction	1._____ 2._____ 3._____ 4._____ 5._____ 6._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
qualified biologist shall survey the trees to the extent feasible to determine if maternity colonies are winter torpor bats are present. If present, the tree shall not be removed until females have given birth to young and when young bats are self-sufficiently volant, as determined by a qualified biologist. If roosting bats or evidence thereof is discovered within any buildings proposed for removal, the qualified biologist who conducted the assessment shall prepare an Avoidance and Minimization Plan (Plan) for the Project that has specific measures to be implemented prior to and during building removal. The Plan shall be reviewed and approved by CDFW prior to the start of Project activities.		timeframes, confirm the trees shall not be removed until females have given birth and young bats are self-sufficiently volant, as determined by the qualified biologist 7. If buildings need to be removed, confirm an Avoidance and Minimization Plan was prepared by the qualified biologist 8. If buildings need to be removed, confirm the Avoidance and Minimization Plan was reviewed and approved by CDFW prior to the start of Project activities 9. Retain a copy of the survey and Avoidance and Minimization Plan (if necessary) in the project file	 7. Construction 8. Construction 9. Post-construction	 7._____ 8._____ 9._____
MM BIO 6A: Common nesting birds and bird species designated as Species of Special Concern A survey for active bird nests shall be conducted by a qualified biologist no more than 14 days prior to the start of Project activities (vegetation removal, grading, or other initial ground-disturbing activities) because ground disturbing activities will commence in May which is during the nesting season (February 1 through August 31). The survey shall be conducted in a sufficient area around the Study Area to identify the location and status of any	NapaSan and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm a survey for active bird nests is conducted by a qualified biologist no more than 14 days prior to the start of Project activities 3. If any nests are discovered, verify the nests are avoided via a work exclusion buffer determined by a qualified biologist.	1. Contracting 2. Pre-construction 3. Pre-construction	1._____ 2._____ 3._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
nests that could potentially be directly or indirectly affected by vegetation removal, or grading activities. Upon completion of the surveys, any nests discovered will be avoided through a work exclusion buffer determined by a qualified biologist to avoid and reduce impacts. Buffers will be sufficiently large and long in duration such that nest abandonment is avoided. The qualified biologist will determine the buffer based on the species and the type of disturbance anticipated to result from Project Activities.		4. Retain a copy of the survey in the project file	4. Post-construction	4._____
MM BIO 7A: Tricolored Blackbird For tricolored blackbird, a preconstruction nesting bird survey shall be conducted by a qualified biologist. The survey area shall extend at least 500 feet from the area of potential disturbance when suitable habitat (dense emergent vegetation near open water) is present. If the active nests of tricolored blackbird are detected, any work that could cause a disruption to parental care will be restricted to a distance of at least 500 feet from the active nest until a biologist has determined the nest is no longer active.	NapaSan, Construction Contractor, and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm a pre-construction nesting bird survey is conducted according to the approved mitigation measure 3. If active nests are detected, confirm any work that could cause disruption to parental care is restricted to at least 500 feet from active nest(s) until a biologist has determined the nest is no longer active 4. Retain a copy of the survey in the project file	1. Contracting 2. Pre-construction 3. Construction 4. Post-construction	1._____ 2._____ 3._____ 4._____
MM BIO 8A: White-tailed Kite For white-tailed kite, a preconstruction nesting bird survey shall be conducted by a qualified biologist. The survey area shall extend at least 0.25 miles from the area of	NapaSan, Construction Contractor and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents	1. Contracting	1._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
potential disturbance and be focused on shrubs and trees suitable for nesting. If the active nests of white-tailed kites are detected, any work that could cause a disruption to parental care will be restricted to a distance sufficient to avoid nest failure. This buffer may be increased or decreased pending observation of the nest by a qualified biologist who will determine the appropriate size of the buffer based on the type of disturbance and response of the individual birds.		2. Confirm a preconstruction nesting bird survey is conducted according to the approved mitigation measure 3. If active white-tailed kite nests are detected, confirm appropriately sized work buffers are established by a qualified biologist 4. Retain a copy of the survey in the project file	2. Pre-construction 3. Pre-construction 4. Post-construction	2._____ 3._____ 4._____
MM BIO 9A: Swainson's hawk A qualified biologist with documented experience conducting protocol-level surveys for SWHA shall conduct pre-construction surveys in accordance with the Swainson's Hawk Technical Advisory Committee's Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (May 31, 2000). The qualified biologist shall conduct 3 surveys in each of the two survey periods prior to the start of Project activities, for a total of 6 survey visits. If breeding Swainson's hawk are observed within 0.5 miles of where Project activities will be occurring, CDFW shall be notified by the Project proponent to discuss appropriate avoidance and minimization measures. Appropriate measures may include having a qualified biologist or trained biological monitor on-site each day during Project activities to ensure the Project does not disturb nesting behavior.	NapaSan and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm a pre-construction survey is performed by a qualified biologist in accordance with the Swainson's Hawk Technical Advisory Committee's Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley (May 31, 2000) 3. Confirm qualified biologist conducted 3 surveys in each of the two survey periods prior to start of Project activities, for a total of 6 survey visits 4. If breeding Swainson's hawk are observed within 0.5 miles of where Project activities will be occurring, confirm CDFW is notified and appropriate avoidance and minimization measures are discussed	1. Contracting 2. Pre-construction 3. Pre-construction 4. Pre-construction	1._____ 2._____ 3._____ 4._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
If an active Swainson's hawk nest is discovered in close proximity to where Project activities must occur, CDFW may require the Project proponent to get a CESA Incidental Take Permit prior to the start of the Project.		5. If an active Swainson's hawk nest is discovered in close proximity to Project activities, confirm with CDFW if a CESA Incidental Take Permit is required prior to the start of Project activities 6. Retain a copy of the survey and permit, if necessary, in the project file	5. Pre-construction 6. Post-construction	5._____ 6._____
MM BIO 10A: California Ridgway's rail and California black rail For California Ridgway's rail and California black rail, surveys, conducted by a qualified biologist, following the "California clapper rail Survey Protocol (USFWS 2015) will be initiated between January 15 and February 1 and should conclude as late as mid-April. Concurrent with California Ridgway's rail surveys, surveys for California black rail will also be performed. The preferred survey window for California black rail is between March 15 and May 31. If either rail species is determined to be actively using the site, an avoidance buffer will be applied around the occupied area to minimize the risk of potentially impacting rails and their nests to less than significant.	NapaSan and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm surveys following the "California clapper rail Survey Protocol" for California Ridgway's rail and California black rail are conducted by a qualified biologist and initiated between January 15 and February 1, and conclude as late as mid-May 3. If either the California Ridgeway's rail or California black rail is active onsite, confirm an avoidance buffer is applied 4. Retain a copy of the survey in the project file	1. Contracting 2. Pre-construction 3. Pre-construction 4. Post-construction	1._____ 2._____ 3._____ 4._____
MM BIO 11A: California red-legged frog (CRLF) Preconstruction surveys by a qualified biologist shall be conducted to determine if CRLF are present in the Project Area. If, present an approved monitor shall be	NapaSan, Qualified Biologist,	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm pre-construction CRLF survey is conducted by qualified biologist	1. Contracting 2. Pre-construction	1._____ 2._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
present during ground disturbance in potentially occupied areas. Habitat for CRLF shall be avoided through demarcation of potentially suitable habitats and worker educational training shall be conducted before the start of construction. For areas that may support CRLF and will be impacted by Project Activities, the Section 7 consultation may prescribe additional measures to avoid CRLF and Napa San or any Project staff will implement these measures		3. If CRLF are present in the Project Area, confirm CRLF habitat is demarcated and worker educational training is conducted prior to construction 4. If CRLF are present in the Project Area, confirm an approved monitor is present during ground disturbance 5. Verify that additional measures prescribed for CRLF in Section 7 consultation are implemented during construction 6. Retain a copy of the survey in the project file	3. Pre-construction 4. Construction 5. Construction 6. Post-construction	3._____ 4._____ 5._____ 6._____
MM BIO 12A: Pacific (western) pond turtle Prior to construction activities, a qualified biologist familiar with the ecology of pond turtles will survey work areas in ruderal grasslands for suitable nesting habitat and pond turtles. Pond turtles will be avoided and allowed to leave work areas on their own volition. Potential nesting areas will be demarcated and avoided to the extent feasible. Workers will receive a pond turtle training course that will educate them about identification of pond turtles and how to avoid them.	NapaSan and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm a Pacific (western) pond turtle survey was performed by a qualified biologist 3. If potential nesting areas are identified, confirm the nesting areas are demarcated and workers receive a pond turtle training course 4. Retain a copy of the survey in the project file	1. Contracting 2. Pre-construction 3. Pre-construction 4. Post-construction	1._____ 2._____ 3._____ 4._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
MM BIO 13A: County Protections for Sensitive Land Cover Types Napa County General Plan Policy CON-17 requires the preservation and protection of sensitive land cover types. Edges of arroyo willow thicket (mixed willow riparian woodland), 2.30 acres of brackish marsh (includes both coastal brackish marsh and northern coastal salt marsh described above) and 0.59 acres of freshwater marsh (includes coastal and valley freshwater marsh described above) shall be clearly marked prior to construction activities. Entrance of construction crew, equipment shall be avoided to the extent feasible.'	NapaSan, Construction Contractor and Qualified Biologist	1. Confirm mitigation measure is incorporated into contract documents 2. In coordination with qualified biologist, confirm edges of arroyo willow, brackish marsh, and freshwater marsh are clearly marked prior to construction activities and entrance of construction crew, equipment shall be avoided to the extent feasible	1. Contracting 2. Pre-construction	1._____ 2._____
MM BIO 14A: County Setback Requirements for Aquatic Features No land clearing for the bypass lines, access pathways, or bypass pump shall be conducted if located within 35-feet of a stream or slough, to the extent feasible. If land clearing is necessary, the following measures shall be executed to reduce impacts: • Appropriate avoidance and minimization measures listed under Mitigation Measure BIO 1B • Equipment shall be staged and operated in developed or ruderal areas at the greatest distance from the stream bank as possible while maintaining the ability to excavate. All excavation will occur from these developed/ruderal areas. If necessary	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. If land clearing is necessary within 35-feet of a stream or slough, confirm appropriate avoidance and mitigation measures listed under MM BIO-1B are implemented 3. If land clearing is necessary within 35-feet of a stream or slough, confirm excavation equipment staging and operation will occur in developed/ ruderal areas and hand-digging is used where equipment cannot 4. If land clearing is necessary within 35-feet of a stream or slough, confirm post-excavation grading shall return	1. Contracting 2. Pre-construction 3. Construction 4. Post-construction	1._____ 2._____ 3._____ 4._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
hand-digging shall be used to reach areas where the equipment cannot. • Post-excavation grading shall return topography to pre-excavation grades. Seeding of native seeds appropriate for the habitat and Napa County shall be used to revegetate the area of disturbance.		topography to pre-excavation grades and native seeding is used to revegetate the area of disturbance		
MM BIO 15A: Wetlands Buffer If work within 50-feet of wetlands is to be conducted, the appropriate measures described in Mitigation Measure BIO 1B, shall be executed to reduce impacts.	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm that if work within 50-feet of wetlands is conducted, the appropriate measures described in MM BIO-1B are implemented to reduce impacts	1. Contracting 2. Construction	1._____ 2._____
MM BIO 16A: Work Near Bedford Slough, Soscol Creek and Associated Streams For Project work within the vicinity of Bedford Slough, Soscol Creek, and the associated streams, see Mitigation Measure BIO 14A above. Those measures shall mitigate impacts sufficient to meet City of Napa Code, including Section 17.52.110 (Creeks and Other Watercourse).	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. For work within the vicinity of Bedford Slough, Soscol Creek, and the associated streams, confirm Mitigation Measure BIO 14A has been implemented	1. Contracting 2. Construction	1._____ 2._____
MM BIO 16B: Work Near Wetlands and Marsh For Project work within the vicinity of wetlands and marsh, see Mitigation Measure BIO 1B above. Those measures shall mitigate impacts sufficient to meet	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. For work within the vicinity of wetlands and marsh, confirm appropriate avoidance and mitigation	1. Contracting 2. Construction	1._____ 2._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
City of Napa Code, including 17.52.530 (Wetlands and Marshes).		measures listed under MM BIO-1B are implemented		
Cultural Resources				
MM CUL-1: Unanticipated Discovery of Cultural Resources In the event of post-review discoveries of cultural resources (e.g., habitation sites, artifacts, various features, isolated artifacts, historic structural remains, trash pits, or human remains or bone, as defined in Footnote 5 of **Appendix D**), the construction Contractor shall notify the NapaSan Project Manager and USACE of the discovery, and shall temporarily suspend all earth-disturbing work within 100-foot radius of the find until a Professional Archaeologist meeting the Standards of the Secretary of Interior has identified and evaluated the discovery in regard to the criteria of the National Register of Historic Places and/or the California Register of Historical Resources. The USACE shall be consulted in regard to the evaluation and recommended treatment of the discovery if it is determined to be a significant or a unique archaeological resource. Ground disturbing construction shall not be allowed within the find area until treatment has been completed to the satisfaction of the USACE. Consultation with the Yocha Dehe Wintun Nation shall be undertaken by the USACE and NapaSan to discuss	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. In the event of a discovery of cultural resources, confirm the construction Contractor temporarily suspends all earth-disturbing work within a 100 foot-radius, NapaSan and USACE are notified, and a Professional Archaeologist has identified and evaluated the discovery 3. If determined to be a significant or a unique archaeological resource, confirm the USACE is consulted regarding the evaluation and treatment of the discovery, and confirm the USACE has consulted with the Yocha Dehe Wintun Nation on appropriate treatment of the discovery. 4. If a discovery is made, confirm ground disturbing activities are not allowed in the find area until treatment has been completed. 5. Document and retain records of discovery in the project file	1. Contracting 2. Construction 3. Construction 4. Construction 5. Post-construction	1._____ 2._____ 3._____ 4._____ 5._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
appropriate treatment of significant prehistoric discovery(ies).				
MM CUL-2: Unanticipated Discovery of Burials or Funerary Objects The exposure and treatment of Native American burials and any associated or unassociated funerary objects discovered during soil-disturbing activity within the Project site shall comply with applicable State laws. This shall include immediately suspending all earth disturbing work within a 100-foot radius of the discovery. The construction Contractor shall immediately notify the appropriate county Coroner/ Medical Examiner and NapaSan. In the event of the Coroner's determination that the human remains are Native American, notification of the Native American Heritage Commission (NAHC), is required who shall appoint a Most Likely Descendant (MLD) (Public Resources Code Section 5097.98) who shall make recommendations for treatment. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. In the event Native American burial and any associated or unassociated funerary objects are discovered, confirm suspension of all earth disturbing work within a 100-foot radius of the discovery 3. In the event Native American burial and any associated or unassociated funerary objects are discovered, confirm notifications have been sent to the county Coroner/Medical Examiner, NapaSan, NAHC, and MLD as appropriate 4. In the event Native American burial and any associated or unassociated funerary objects are discovered, verify adequate consultation with MLD has occurred and work does not resume within the no-work radius until the appropriate treatment measures have been implemented 5. If a discovery is made, document and retain records of discovery in the project file	1. Contracting 2. Construction 3. Construction 4. Construction 5. Post-construction	1._____ 2._____ 3._____ 4._____ 5._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
MM CUL-3: Cultural Resources Sensitivity Training. Prior to start of any ground-disturbing activities, a qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel associated with the Project. Construction personnel shall be informed of the types of cultural resources that may be encountered during construction, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. Napa Sanitation District shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm Cultural Resources Sensitivity Training is conducted and documented in a record of attendance. Retain training records in the project file	1. Contracting 2.Pre-construction	1._____ 2._____
Hazards and Hazardous Materials				
MM HAZ-1: Hazardous Materials Management and Spill Prevention and Control Plan (HMMSPCP) Before construction begins, the construction Contractor shall submit to NapaSan a Hazardous Materials Management and Spill Prevention and Control Plan (Plan) that includes a project-specific contingency plan for hazardous materials and waste operations. The Plan will be applicable to construction activities and should establish policies and procedures according to applicable codes and regulations including, but not limited to, the California Building and Fire Codes, and federal and California Occupational	NapaSan and Construction Contractor	1. Confirm that contract documents include preparation of a Hazardous Materials Management Spill Prevention and Control Plan 2. Confirm contractor has prepared HMMSPCP and is available on-site 3. Retain a copy of the HMMSPCP in the project file	1. Contracting 2. Construction 3. Post-construction	1._____ 2._____ 3._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
Safety and Health Administration (OSHA) regulations. Elements of the Plan will include, but not be limited to, the following: • A discussion of hazardous materials management, including delineation of hazardous material storage areas, access and egress routes, waterways, emergency assembly areas, and temporary hazardous waste storage areas; • Notification and documentation of procedures; and • Spill control and countermeasures, including employee spill prevention/response training.				
MM HAZ-2: Contaminated Soil or Groundwater Contingency Procedures NapaSan shall coordinate construction with the owner of the former Napa Pipe property to ensure construction activities are consistent with closed remediation sites. NapaSan shall require its construction Contractor to follow the procedures below in the event that contaminated soil or groundwater is encountered (either visually or through odor detection) during excavation activities: • Stop work in areas of contamination; • Notify the San Francisco Bay Regional Water Quality Control Board; • Contain the areas of contamination; • Perform appropriate clean up procedures; and	NapaSan and Construction Contractor	1. Confirm mitigation measure is incorporated into contract documents 2. Confirm NapaSan coordinated with the former Napa Pipe property owner to ensure construction activities are consistent with closed remediation sites 3. In the event contaminated soil or groundwater is encountered, verify the approved mitigation measure procedures are implemented 4. If a contamination is encountered, retain a copy of all notifications and site investigations, in the project file	1. Contracting 2. Pre-construction 3. Construction 4. Post-construction	1._____ 2._____ 3._____ 4._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
• Segregate, profile, and dispose of contaminated soil. Required disposal method shall depend on the type and concentration of contamination identified. Any site investigation or remediation shall be performed in accordance with applicable regulations.				
Transportation				
MM TRA-1: Traffic Control Plan Prior to construction, NapaSan shall require its construction Contractor to implement an approved Traffic Control Plan, to the satisfaction of the NapaSan construction inspector and the County. The components of the Traffic Control Plan shall include: • Identification of construction staging site locations and potential road closures, • Alternate routes of traffic detours, including emergency response contact information, • Planned routes for construction-related vehicle traffic (haul routes), and • Identification of alternative safe routes to maintain pedestrian safety during construction. NapaSan's Project manager shall coordinate with the police, fire, and other emergency services to alert these entities about potential construction delays, Project	NapaSan and Construction Contractor	1. Confirm that contract documents include requirement for a Traffic Control Plan 2. Confirm that a Traffic Control Plan was developed and approved. 3. Confirm coordination of construction schedules has occurred with emergency services 4. Confirm traffic control measures identified in the Traffic Control Plan are implemented during construction	1. Contracting 2. Pre-construction 3. Pre-construction 4. Construction	1._____ 2._____ 3._____ 4._____

Mitigation Measure	Party Responsible for Implementation and Reporting	Monitoring and Reporting Actions	Implementation Schedule	Verification: Status/Date Completed/ Initials
alignment, and construction schedule. NapaSan shall minimize the duration of disruptions/closures to roadways and critical access points for emergency services. The Traffic Control Plan shall provide for traffic control measures including flag persons, warning signs, lights, barricades, and cones to provide safe passage of vehicular, bicycle and pedestrian traffic and access by emergency responders. The Traffic Control Plan shall be submitted to NapaSan's Project manager and construction inspector for review and approval prior to construction. NapaSan's construction inspector shall have the construction schedule and Traffic Control Plan reviewed by Napa County to ensure construction of the proposed Project does not conflict with construction activities associated with other construction projects that may be occurring at the same time in the vicinity.				