

MITIGATION, MONITORING AND REPORTING PROGRAM
Mendocino Council of Governments Covelo State Route 162 Corridor Multi-Purpose Trail Project

Environmental Protection Actions and Mitigation Measures	Implementation Procedure	Monitoring Responsibility	Monitoring / Reporting Action & Schedule	Monitoring Compliance Record (Name/Date)
<p>Environmental Protection Action 1: Geotechnical Design As part of the project design process, MCOG has engaged a California-registered Geotechnical Engineer to conduct a geotechnical report for the project. MCOG's contractor(s) will design the project to comply with the site-specific recommendations made in the project's geotechnical report. This will include design in accordance with the seismic and foundation design criteria, as well as site preparation and grading recommendations included in the report. The geotechnical recommendations will be incorporated into the final plans and specifications for the project, and will be implemented during construction.</p>	Incorporate recommendations into final plans and specifications.	MCOG	Verify all geotechnical study design recommendations are incorporated into final plan set.	
<p>Environmental Protection Action 2: Implement Air Quality Emission Control Measures During Construction The Mendocino County Air Quality Management District (MCAQMD) has adopted thresholds of significance for CEQA that recommends implementation of Best Management Practices to limit construction-related fugitive dust emissions. To limit dust, criteria pollutants, and precursor emissions associated with construction activities, MCOG will include the following MCAQMD and Bay Area Air Quality Management District (BAAQMD) construction measures in all construction contract specifications for the project:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas and unpaved access roads) shall be watered twice per day, and additionally as necessary during dry or windy conditions. 2. Erosion control measures must be employed to prevent water runoff containing silt and debris from entering the storm drain system. 3. All haul trucks transporting soil, sand, or other loose material on- or off-site shall be covered. 4. All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. 5. Approved chemical soil stabilizers shall be applied to exposed earth surfaces in inactive construction areas and exposed stock piles (i.e. sand, gravel, dirt). 6. All vehicle speeds on unpaved areas shall be limited to 10 miles per hour. 7. Dust generating activities shall be limited during periods of high winds (over 15 mph). 8. Access of unauthorized vehicles onto the construction site during non-working hours shall be prevented. 9. A daily log shall be kept of fugitive dust control activities. 10. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage identifying these idling limitations shall be provided for construction workers at all access points. 	Incorporate into final plans and specifications.	MCOG	Verify in final specifications. Check daily jobsite compliance as necessary.	

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<p>11. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.</p> <p>12. A publicly visible sign shall be posted with the telephone number and person to contact at the MCOG regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations.</p>				
<p>Environmental Protection Action 3: Construction Measures for Avoiding Special-status Wildlife Species Habitat</p> <p>To protect special-status wildlife species and habitats located in the vicinity of the project, MCOG will implement the following protection actions during construction of the project:</p> <p>1. No work activities will occur within the channel of Mill Creek below the area mapped as Ordinary High Water Mark (OHWM), although some work including pile driving may be within the riparian zone. Consultation with the California Department of Fish and Wildlife (CDFW) and the National Marine Fisheries Service will occur regarding potential impacts to aquatic habitat and special-status fish species (and potentially amphibian species depending on listing status at time of implementation), and the U.S. Army Corps of Engineers regarding impacts/fill of wetlands.</p> <p>2. Silt fencing and orange construction avoidance fence will be installed along the entire downslope edge of the disturbed area of project sites on the east and west side of Mill Creek as necessary.</p> <p>3. Work immediately adjacent to Mill Creek would avoid impacts to fish and frogs by taking place only when the stream channel is dry (normally early August through late October) for a sufficient distance up and downstream to avoid the risk of piledriving impacts. To avoid sediment delivery to a creek where salmonids could be present, work immediately adjacent to the creek would terminate by October 15 if feasible (or at onset of rainy season).</p>	<p>Incorporate into final plans and specifications.</p>	<p>MCOG</p>	<p>Verify in final specifications. Check daily jobsite compliance as necessary.</p>	
<p>Mitigation Measure BIO-1: Conduct Seasonally Appropriate Pre-construction Plant Surveys</p> <ul style="list-style-type: none"> MCOG will ensure that if the Alternative 2 trail alignment, east section, is chosen, that seasonally appropriate pre-project plant surveys shall be conducted during the seasonally-appropriate window when target plant species are in bloom, during 2018 spring/summer, or sufficiently prior to the planned construction window so as to allow adequate time for seed collection for plant propagation and/or plant translocation, if sensitive plant species are found. If sensitive plant species are documented within the project footprint or temporary construction impact area for Alternative 2 and cannot be avoided, a species-specific Sensitive Species Mitigation Plan (SSMP) will be developed in the year prior to construction and submitted to CDFW for consideration. The plan will include species-specific measures for plant relocation, seed collection, and/or nursery plant 	<p>Incorporate into final plans and specifications. Conduct preconstruction plant surveys if Alternative 2 trail alignment is chosen. Implement a SSMP.</p>	<p>MCOG</p>	<p>Verify that surveys are conducted during the seasonally-appropriate window when target plant species are in bloom.</p>	

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<p>propagation, replanting and monitoring. The SSMP will designate an appropriate site(s) for planting sensitive plants as mitigation for impacts, either along the linear project corridor or at a nearby location. The SSMP will document suitable conditions for species-specific plant requirements at the mitigation site(s). The SSMP will provide a monitoring approach for no net loss of plant species within three years of implementation of the mitigation plan.</p> <ul style="list-style-type: none"> The results of the plant survey are generally considered valid for up to two to three years depending on the potential plant species present. Surveys should be updated or preconstruction surveys utilized, if the project is not implemented prior to the current survey results expiring. Given the generally low quality habitat for sensitive-listed plant species in the project footprint and temporary impact areas, preconstruction surveys are not proposed within the Alternative 1 PSB if construction related project clearing activities are conducted prior the end of 2020, which is within three years of the original botanical survey conducted in June 2017. MCOG will work with CDFW through the incidental take process to determine if a viable Milo baker's lupine seedbank is present within the project area. If a viable seed bank is identified, the location shall be evaluated by a qualified CDFW botanist and a recommendation for further action developed. Further action could include avoidance, recovery, or another method recommended by the CDFW botanist. 				
<p>Mitigation Measure BIO-2: Survey and (if necessary) Relocation of Sensitive Amphibian Species MCOG shall ensure that preconstruction surveys for sensitive or Candidate listed amphibian species (such as the Foothill Yellow-legged Frog, depending on listing status at time of project implementation) shall be conducted in 2018 in appropriate habitat within vegetated areas of the project footprint, culverts within the project footprint, and below the top of bank of Mill Creek within the project footprint and within a minimum 200 foot radius (where accessible) of pile driving locations, by a qualified biologist during the breeding season in April. Sensitive-listed amphibian species observed, if any, shall be relocated immediately prior to construction outside of the project impact area to nearby suitable and accessible habitat. If Foothill Yellow-legged Frog are listed under CESA prior to construction then an Incidental Take Permit shall be prepared and submitted to the CDFW.</p>	<p>Incorporate recommendations into final plans and specifications. Conduct preconstruction surveys for sensitive or Candidate listed amphibian species. Relocate sensitive or Candidate listed amphibian species if necessary.</p>	<p>MCOG</p>	<p>Verify that surveys are conducted prior to work near Mill Creek. Verify that sensitive-listed amphibian species observed, if any, are relocated.</p>	
<p>Mitigation Measure BIO-3: Conduct Bat and Bird Surveys for Protected Avian Species 1. MCOG shall ensure that seasonal avoidance of the March 15 – August 15 nesting season will be utilized when feasible, to avoid impacts to native bird species protected under the Migratory Bird Treaty Act that may be present within the project footprint or adjacent area during construction. Clearing of shrubs or other vegetation, if necessary for</p>	<p>Incorporate recommendations into final plans and specifications.</p>	<p>MCOG</p>	<p>Verify that surveys are conducted prior to grading or disturbing during nesting season.</p>	

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<p>construction or maintenance, shall be conducted if possible during the fall and/or winter months from August 16 to March 14th, outside of the active nesting season. If vegetation removal or ground disturbance cannot be confined to work during the non-breeding season, the MCOG shall have a qualified biologist conduct preconstruction surveys within the vicinity of the impact area, to check for nesting activity of native birds and to evaluate the site for presence of raptors and special-status bird species. The biologist shall conduct a minimum of one day preconstruction survey within the 7-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance and vegetation removal work lapses for seven days or longer during the breeding season, a qualified biologist shall conduct a supplemental avian preconstruction survey before project work is reinitiated.</p> <p>2. If active nests are detected within the construction footprint or within 500 feet of construction activities, the biologist shall have locations flagged that are supporting breeding, and MCOG will not begin ground disturbing work or vegetation removal inside the project avian buffers until the young have fledged. Construction activities shall avoid nest sites until the biologist determines that the young have fledged or nesting activity has ceased. If nests are documented outside of the construction (disturbance) footprint, but within 500 feet of the construction area, buffers will be implemented as needed. In general, the buffer size for common species would be determined on a case-by-case basis in consultation with the CDFW. The buffer size for sensitive species would be 300 feet, and the buffer size for raptors would be 500 feet, if deemed appropriate in coordination with the CDFW.</p> <p>3. Buffer sizes will take into account factors such as (1) noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species and behaviors of the nesting birds. The survey results will be reported to the CDFW prior to the commencement of construction activities.</p> <p>4. A bat survey will be conducted during the spring or summer of 2018, with emphasis on the proposed crossing of Mill Creek and any areas where oaks may be disturbed. Surveys will be conducted by a qualified biologist and will include at a minimum a visual inspection of the underside of the existing SR 162 bridge over Mill Creek and any large oaks with cavities or loose bark. If bats are located, an attempt will be made to identify the species either visually or acoustically. If the presence of a bat maternity colony or roost is confirmed, no pile driving or other activity generating significant noise will occur within 300 feet of the roost from April 1 through August 15 or until young have dispersed.</p>	<p>Conduct preconstruction nesting surveys if grading or vegetation removal occurs during nesting season.</p> <p>Implement recommended protection measures as necessary.</p>		<p>Verify that disturbance buffers and fencing requirements are in final specifications.</p>	
<p>Mitigation Measure BIO-4a: Replacement of Impacted Riparian Vegetation Where the bridge placement directly impacts riparian through vegetation removal, the following (or similar) planting plan will be implemented to re-establish and/or replace riparian vegetation impacted at a minimum 1:1 ratio. In areas where vegetation is temporarily impacted through construction activities, the replacement area will be onsite in</p>	<p>Incorporate into specifications.</p> <p>Prepare planting plan and re-establish and/or</p>	<p>MCOG</p>	<p>Verify that re-establishment/ replacement of impacted riparian</p>	

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<p>the area of impact, to re-establish impacted vegetation. Where impacts are a result of direct impact such as from bridge footings, trail footprint, and/or fill slopes, replacement will be in an area adjacent to existing riparian so as to expand and/or fill in gaps in the existing riparian corridor.</p> <p>For areas above the top of bank (TOB), the planting plan includes tree and shrub species similar to those anticipated to be impacted. For the area above the OHWM (i.e., not in stream channel), and below the TOB, a second planting plan is proposed that focuses on willow and herbaceous species along with hydroseeding, which is a similar assemblage to existing conditions. For impact areas between the OHWM and the TOB, the area will also be covered with one inch diameter biodegradable jute mesh.</p> <p>All riparian impact areas and replacement areas will be broadcast or hydroseeded with native grass seed mix that includes not more than 50% sterile seed as a component of mix (refer to manufacturer's recommendation for maximum quantity of sterile seed recommended). Seeding shall occur after impact occurs and prior to onset of winter rains. Two implementation options exist for seeding: 1) may be before, or 2) after the planting plan is implemented, depending on when nursery stock is available and nursery contractor availability. If possible, seeding should occur immediately after impact (Option 1) so as to provide timely revegetation and ground cover of impacted area, with nursery contractor following up with implementing planting plan just prior to winter rains which would then provide passive irrigation for the nursery plants. If it is determined that implementation of the planting plan by nursery contractor would disrupt the seeded surface due to trampling, Option 2 approach would be to implement the planting plan immediately after impact occurs, with immediate follow up of seeding. Following is the recommended planting plan, with substitutions to plant species allowed if consulting with project biologist:</p> <p>Planting plan above top of bank for temporary impacts:</p> <ul style="list-style-type: none"> • Arroyo willow (<i>Salix lasiolepis</i>) [may be salvaged from impact area and/or stakes cut from adjacent riparian] • Coffeeberry (<i>Frangula californica</i>) • Western mock orange (<i>Philadelphus lewisii</i>) • Snow berry (<i>Symphoricarpos albus</i> var. <i>laevigatus</i>) • Creek clematis (<i>Clematis ligusticifolia</i>) • Mugwort (<i>Artemisia douglasiana</i>) • Wild rye (<i>Elymus glaucus</i>) [may include additional native grass species in the mix for hydroseeding purposes] <p>Planting plan below top of bank for temporary impacts and for direct impacts:</p> <ul style="list-style-type: none"> • Arroyo willow (<i>Salix lasiolepis</i>) [may be salvaged from impact area and/or stakes cut from adjacent riparian] • Creek clematis (<i>Clematis ligusticifolia</i>) 	<p>replace riparian vegetation.</p>		<p>vegetation has taken place.</p>	

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<ul style="list-style-type: none"> • mugwort (<i>Artemisia douglasiana</i>) • Wild rye (<i>Elymus glaucus</i>) [may include additional native grass species in the mix for hydroseeding purposes] 				
<p>Mitigation Measure BIO-4b: Pile Driving in Mill Creek Pile driving near Mill Creek would occur in the dry season. If any remnant wetted channel is present within 200 feet of pile driving locations, then a qualified biologist would survey the pools and channel and relocate any native fish and frogs to the nearest suitable habitat outside of the potential impact area. Relocation efforts would be coordinated with NMFS and CDFW.</p>	<p>Incorporate recommendations into specifications. Conduct survey within 200 feet of pile driving locations along Mill Creek. Relocate any native fish and frogs to the nearest suitable habitat outside of the potential impact area.</p>	MCOG	<p>Verify that surveys are conducted prior to pile driving work near Mill Creek. Verify that if any native fish and frogs are observed that they are relocated.</p>	
<p>Mitigation Measure BIO-5: Protection and Replacement of Oak Trees MCOG will ensure that the following measures will be taken to reduce potential impacts to oak trees:</p> <ul style="list-style-type: none"> • Impacts to oak trees from construction and long-term operation will be calculated at the drip line (combines direct impacts to trunks and potential indirect impacts within the drip line). An arborist or biologist will conduct a tree survey prior to construction within areas where direct or indirect impacts to oaks are anticipated. The arborist or biologist will document tree species and dbh of all oaks with canopy or trunks within the impact area, with an impact defined as ground disturbance or compaction within the dripline. Project mitigation for direct and indirect impacts will be calculated as follows: <ul style="list-style-type: none"> - <12 inch dbh will provide minimum of 3:1 mitigation ratio - 12-18 inch dbh will provide minimum of 4:1 mitigation ratio - >18 inch dbh will provide minimum of 5:1 mitigation ratio <p>The replacement species composition and final number of trees to be planted at the mitigation area shall be subject to approval by CDFW. Although the project site has sufficient area to accommodate the required tree mitigation, alternative sites may be considered including local parks or schools or installation of trees on adjacent properties for screening purposes to the satisfaction of CDFW, Caltrans, the MCOG, and relevant property owners.</p>	<p>Incorporate into final plans/specifications. Conduct oak tree survey prior to construction.</p>	MCOG	<p>Verify that impacted oaks are replaced at the recommended ratio.</p>	

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<p>A Habitat Mitigation Plan (HMP) will be prepared that provides a description of the mitigation site, site selection criteria, and appropriate conditions of oak growth, plant propagation methods, acorn collection if any, implementation, maintenance, and monitoring, to be submitted to CDFW for consideration. The HMP will describe whether overplanting is recommended to allow for mitigation ratios to be achieved.</p> <p>The following tree protection measures will also be included in the project in order to protect trees to be preserved during construction:</p> <p><i>Pre-construction treatments:</i></p> <ol style="list-style-type: none"> 1. The MCOG shall retain a consulting scientist (arborist or biologist). The construction superintendent shall meet with the consulting scientist before beginning work to discuss work procedures and tree protection. 2. Fence all trees to be retained within the trail and staging construction areas by a minimum of 10 feet beyond the drip line to completely enclose the Tree Protection Zones prior to staging, grubbing, or grading. Fences shall be orange construction avoidance fence staked at regular intervals of approximately 10 feet on center, or six foot chain link or equivalent as approved by consulting arborist or biologist. Fences are to remain until all grading and construction is completed. 3. If pruning of trees to be preserved is necessary to clean the crown and to provide clearance, all such activity shall be completed or supervised by an arborist or qualified biologist and follow the Best Management Practices for Pruning of the International Society of Arboriculture. <p><i>During construction:</i></p> <ol style="list-style-type: none"> 1. No grading, construction, demolition or other work shall occur within the Tree Protection Zone. Any modifications must be approved and monitored by the consulting arborist or biologist. 2. Root pruning will be minimized, and if necessary, any root pruning required for construction purposes shall receive the prior approval of, and be supervised by, a consulting arborist or biologist. 3. If injury should occur to any tree during construction, it shall be evaluated as soon as possible by the consulting arborist or biologist to determine if impact should be accounted for in the mitigation requirements. 4. No excess soil, chemicals, debris, equipment or other materials shall be placed or stored within the Tree Protection Zone. 				
<p>Mitigation Measure BIO-6: Mitigate Direct and Temporary Impacts to Wetlands during Construction</p> <p>MCOG shall ensure that if the Alternative 2 alignment is selected, a complete USACE wetland delineation will be completed for the alignment where not coincident with</p>	<p>Incorporate into final plans/ specifications.</p>	<p>MCOG</p>	<p>Verify that wetlands impacted are replaced at the recommended mitigation ratio.</p>	

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<p>Alternative 2, the results of which will be submitted to the USACE for jurisdictional determination. Further, for either alignment option, as part of project design, the Applicant/MCOG will work with the project engineer to design a replacement wetland ditch or OHWM ditches along the trail alignment in areas where the trail will impact roadside regulated wetland ditch at a minimum of 1:1 ratio. For impacts to other regulated wetland types not categorized as wetland ditch, MCOG will ensure that impacted USACE wetlands will be mitigated at a location agreed upon with the appropriate regulatory agencies and at the ratio (minimum 1:1) specified in permit special conditions to ensure no net loss. Mitigation would include wetland areas that would be re-established, established, enhanced, and/or preserved. This measure would mitigate both the permanent onsite loss of wetlands as a result of the proposed project and also the temporary construction impacts. The wetland mitigation would need to provide the same or similar ecological functions as the impacted wetlands. This would include re-establishing, establishing, enhancing, and preserving wetlands with a similar hydrologic regime, and similar vegetation types. The wetland mitigation should be designed to function with the intact wetland features of the mitigation area. As a result, not all wetland mitigation sites may serve exactly the same function, but each area should contribute to the diversity of the ecosystem as a whole.</p>	<p>Prepare a wetland delineation if Alternative 2 alignment is chosen.</p>			
<p>Mitigation Measure CR-1: Protect Archaeological Resources during Construction Activities MCOG shall ensure that the following measures are taken during construction activities to protect known and unknown archaeological sites and resources.</p> <p>Site P-23-000267 - The recorded area of this site plus a 10-meter buffer shall be fenced prior to construction so that it will not be damaged by staging area use.</p> <p>Site P-23-001086 - This site is located at the eastern edge of one of the proposed staging areas. No evidence of the site was found, however, to ensure that the site is protected the staging area shall be restricted to the land within 60 meters of SR 162. This will allow for a 10-meter buffer between the recorded site boundary and any staging area activities.</p> <p>Site P-23-001183 – If the project cannot be redesigned to avoid the site, then the project contractor shall cover the portion of the site that will be impacted by the project plus a 10-meter buffer with geofabric and covered with soil so that the trail can be constructed on top of the archaeological site. Covering the site with geofabric (recommended by tribal representatives) and soil must be conducted in such a way so that no ground disturbing activities occur to the site. Any vegetation removal prior to covering the site, and placement of geofabric and soil should be overseen by an archaeologist who meets the Secretary of the Interior's Standards.</p> <p>Trailside Foundation – If the trail can't be designed to be at least five feet from the foundation then it is recommended that the eastern edge of the foundation be fenced, and a training session be conducted for the construction crew so that they are made aware of the presence of this resource and the need to avoid it.</p>	<p>Incorporate into specifications.</p>	<p>MCOG</p>	<p>Verify requirements are in final specifications.</p>	

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<p>In the event that any subsurface archaeological features or deposits, including locally darkened soil, are discovered during construction-related earth-moving activities, the MCOG shall halt all ground-disturbing activity in the vicinity of the resources and a qualified professional archaeologist/tribal representative shall be retained to evaluate the find. If the find is determined to constitute either an historical resource or a unique archaeological resource per CEQA Guidelines sections 15064.5, the archaeologist shall develop appropriate mitigation to protect the integrity of the resource and ensure that no additional resources are affected. Mitigation could include but would not necessarily be limited to avoidance, preservation in place, archival research, subsurface testing, or excavation and data recovery.</p>				
<p>Mitigation Measure CR-2: Protect Paleontological Resources during Construction Activities In the event that any vertebrate fossils are encountered during construction, MCOG shall temporarily halt all ground disturbing activities within 50 feet of the discovery, the County Planning and Building Services department shall be notified, and a qualified paleontologist shall be retained to determine the significance of the discovery. The MCOG shall consider the mitigation recommendations of the qualified paleontologist for any unanticipated discoveries. The MCOG shall consult and agree upon implementation of a measure or measures that they deem feasible and appropriate. Such measures may include avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The MCOG will implement the agreed upon mitigation measures necessary for the protection of paleontological resources.</p>	<p>Incorporate into specifications.</p>	<p>MCOG</p>	<p>Verify requirements are in final specifications.</p>	
<p>Mitigation Measure CR-3: Protect Human Remains if Encountered during Construction MCOG shall immediately notify the Mendocino County Coroner should human remains, associated grave goods, or items of cultural patrimony be encountered during construction, and the following procedures shall be followed as required by Public Resources Code § 5097.9 and Health and Safety Code § 7050.5. In the event of the coroner's determination that the human remains are Native American, notification of the Native American Heritage Commission, which would appoint a Most Likely Descendant (MLD). A qualified archaeologist, MCOG and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects. The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects.</p>	<p>Incorporate into specifications.</p>	<p>MCOG</p>	<p>Verify requirements are in final specifications.</p>	
<p>Mitigation Measure HAZ-1: Impacted Soil and Groundwater Sampling and Analysis MCOG shall ensure that its contractors who impact soil and groundwater within 15 feet of sites assigned a Hazard Rank of 2 or 3 shall sample and characterize (via laboratory</p>	<p>Incorporate soil and groundwater measures into specifications.</p>	<p>MCOG</p>	<p>Verify soil and groundwater handling requirements and</p>	

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<p>analysis) the material prior to construction activities. During construction if buried wood waste, debris, or suspected impacted soil is encountered, the material shall be separated, stockpiled, and characterized via laboratory analysis. If groundwater is anticipated to be encountered within 15 feet of Hazard Rank 2 or 3 sites then it shall also be sampled and laboratory analyzed prior to construction. Potential constituents of concern (COC) for soil at groundwater for Hazard Rank 2 and 3 sites within the project site are included on Table 1 of the GHD Initial Site Assessment (October 2017). Site workers involved in excavation and dewatering activities shall be Hazardous Waste Operations and Emergency Response (HAZWOPER) trained.</p>			analysis are in final specifications.	
<p>Mitigation Measure HAZ-2: Prepare and Implement Fire Safety Plan In coordination with MCOG, the construction contractor shall develop and implement a Fire Safety Plan for use during project construction. The Fire Safety Plan shall be submitted to the Covelo Fire Department for review and approval prior to commencement of construction. The Fire Safety Plan shall contain the following requirements:</p> <ul style="list-style-type: none"> • Fires shall be immediately reported to 911 and the Covelo Fire Department. • The construction contractor shall maintain fire toolbox pursuant to California Code - Section 4428. • Fire safety measures shall be posted for the duration of construction on the project bulletin board at the contractor's field office or other central location and areas visible to employees. • All internal combustion engines used at the site shall be equipped with spark arresters in working order, as applicable. • Mufflers on motor vehicles shall be maintained in good working order and motor vehicles shall only be used off-road if the area has been cleared of vegetation. • Equipment parking areas and small stationary engine sites shall be cleared of all flammable materials. • Personnel shall be trained in the practices of the Fire Safety Plan relevant to their duties. • Smoking shall be limited to 15' x 15' paved or gravel areas or areas cleared of all combustible vegetation. • Any construction contract(s) for the project shall state the requirements of this mitigation measure. 	Incorporate into specifications. Prepare Fire Safety Plan and submit to Covelo Fire Department.	MCOG	Verify plan is attached to final specifications.	
<p>Mitigation Measure NOI-1: Hours of Construction MCOG shall ensure that construction activities will be limited to the hours of 7:00 AM to 7:00 PM on weekdays, 8:00 AM to 6:00 PM on Saturdays, and no work on Sundays and Holidays except in emergencies or with prior approval from MCOG.</p>	Incorporate into specifications.	MCOG	Verify requirements are in final specifications.	

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<p>Mitigation Measure NOI-2: Implement BMPs during Construction</p> <ul style="list-style-type: none"> The contractor shall alert heavy equipment operators to the close proximity of the adjacent structures so they can exercise extra care. The contractor shall retain a qualified firm to conduct a pre- and post-construction cosmetic crack survey of the buildings located within 20 feet of the trail and shall repair any additional cosmetic cracking. Limit the use of heavy vibration-generating construction equipment within 20 feet of the buildings located along the project corridor. 	<p>Incorporate into specifications. Conduct pre- and post-construction cosmetic crack survey.</p>	<p>MCOG</p>	<p>Verify requirements are in final specifications.</p>	
<p>Mitigation Measure NOI-3: Implement BMPs during Construction</p> <p>MCOG shall develop a construction noise control plan, including, but not limited to, the following available controls:</p> <ul style="list-style-type: none"> Limit construction hours to between 7:00 a.m. and 7:00 p.m., Monday through Saturday. Noise due to extreme noise-generating construction activities, such as pile driving activities, shall be minimized to the extent feasible. Pile driving activities and other noisy construction activities shall be completed as quickly as possible to limit noise exposure. Select less sensitive periods for pile driving, such as weekdays during mid-day hours. Neighbors located along the project corridor shall be notified of the construction schedule in writing, especially prior to pile driving activities. Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a 5 dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receiver and if the barrier is constructed in a manner that eliminates any cracks or gaps. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment. Electrical equipment shall be selected, where feasible. Unnecessary idling of internal combustion engines should be strictly prohibited. Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors. The construction contractor shall utilize “quiet” models of air compressors, ventilation fans, and other stationary noise sources where technology exists. 	<p>Incorporate into specifications.</p>	<p>MCOG</p>	<p>Verify requirements are in final specifications.</p>	

MITIGATION, MONITORING AND REPORTING PROGRAM
Mendocino Council of Governments Covelo State Route 162 Corridor Multi-Purpose Trail Project

Environmental Protection Actions and Mitigation Measures	Implementation Procedure	Monitoring Responsibility	Monitoring / Reporting Action & Schedule	Monitoring Compliance Record (Name/Date)
<ul style="list-style-type: none"> • Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors. • Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site. • The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance. • Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule. 				
<p>Mitigation Measure TCR-1: Protect Tribal Cultural Resources during Construction Activities</p> <p>In the event that any tribal cultural resources are discovered during construction-related earth-moving activities, MCOG shall halt all ground-disturbing activity in the vicinity of the resources and an appropriate tribal representative(s)/archaeologist shall be notified. If the find is determined to constitute a tribal cultural resource per Public Resources Code Section 21074, the appropriate tribal representative(s)/archaeologist shall develop appropriate mitigation to protect the integrity of the resource and ensure that no additional resources are affected. Mitigation could include but would not necessarily be limited to avoidance, preservation in place, archival research, subsurface testing, or excavation and data recovery.</p>	Incorporate into specifications.	MCOG	Verify requirements are in final specifications.	