

Mitigation Monitoring and Reporting Program

City of Eureka - Eureka Operations Complex Project

SCH No. 2023090278

Best Management Practices (BMPs) and Mitigation Measures (MM)	Implementing Responsibility	Monitoring/Reporting Action & Schedule	Verification (Initials/Date)
<p>BMP 1 – Stormwater Pollution Prevention Plan (SWPPP)</p> <p>The Project would obtain coverage under the North Coast Regional Water Quality Control Board (NCRWCB), Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction Activities (General Permit). The City would submit permit registration documents (notice of intent, risk assessment, site maps, SWPPP, annual fee, and certifications) to the Water Board. The SWPPP would address pollutant sources, BMPs, and other requirements specified in the Order. The SWPPP would include erosion and sediment control measures, dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner would oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.</p>	<p>City's contractor, to be verified by a SWPPP practitioner</p>	<p>Reporting actions – As required by the state permit</p> <p>Schedule - During project construction activities, including work and non-work times</p>	
<p>BMP 2 – Implementation of Geotechnical Design Recommendations</p> <p>The Project would be designed and constructed in compliance with site-specific recommendations made in the Report of Geotechnical Investigation. This would include design in accordance with recommendations for earthwork, such as site clearing, cut/fill slopes, subgrade preparation, material for fill, compaction requirements, trenches, and foundations. The geotechnical recommendations would be incorporated into the final plans and specifications for the Project and would be implemented during construction.</p>	<p>City and City's contractor</p>	<p>Reporting actions – Verify inclusion of recommendations in final plans and specifications</p> <p>Schedule – Pre- and during construction; verify implementation of recommendations</p>	
<p>Air Quality</p>			
<p>MM AQ-1: Measures to Reduce Air Pollution</p> <p>The contractor shall implement the following BMPs during construction:</p> <ul style="list-style-type: none"> – All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered in areas of active construction as necessary. – All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 	<p>City and City's contractor</p>	<p>Reporting actions – Verify requirements are included in final plans and specifications</p> <p>Schedule – During construction, check jobsite compliance routinely</p>	

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<ul style="list-style-type: none"> - All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures. - All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. - Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage noting idling time requirements shall be provided for construction workers at all access points. - All construction equipment shall be maintained and properly tuned in accordance with the manufacturer's specifications. - A publicly visible sign shall be posted 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 of the complaint. The NCUAQMD's phone number shall also be visible to ensure compliance with applicable regulations. 			
Biological Resources			
<p>MM BIO-1: Avoidance and Minimization Measures to Protect Special Status Bats</p> <p>If trees are to be removed during any season, conduct a phased removal of trees where selected limbs and branches not containing cavities or peeled bark are removed on the first day, with the remainder of the tree removed on the second day.</p>	City, and contractor	<p>Reporting actions – Verify that phased removal measures are in final specifications;</p> <p>Schedule – Pre-construction and during construction; verify phased removal of trees</p>	
<p>MM BIO-2: Avoidance and Minimization Measures to Protect Special Status and Nesting Birds</p> <p>Conduct vegetation removal and other ground-disturbance activities associated with any construction activities between late August and mid-March, when birds are not typically nesting; or If vegetation removal or ground-disturbing activity is to take place during the nesting season (March 15 to August 15 for most birds), a qualified biologist shall conduct a pre-construction nesting bird survey. Pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species-specific measures shall be prepared by a qualified biologist in consultation with the USFWS or CDFW, as applicable, and implemented to prevent abandonment of the active nest.</p>	City, City's biologist, and contractor	<p>Reporting actions – Verify that protection measures are in final specifications; verify completion and documentation of surveys, if necessary</p> <p>Schedule – Pre-construction and during construction; verify nesting season is avoided or surveys are conducted and applicable disturbance buffers and protection measures are implemented as necessary</p>	

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<p>MM BIO-3: Avoidance and Minimization Measures to Protect Special Status Bees</p> <p>Clear vegetation during late fall to early spring months (October 1 to April 30) to avoid peak flight season, minimize impacts to floral resources, and reduce the potential for floral resources to draw bumble bees into the Project Area. During grubbing and other ground-disturbing activities that occur during the typical nesting bee active period (typically May 1 to September 30), a qualified biologist shall survey the area for bumble bees, with particular attention to potential floral resources and potential nest sites. If a special-status bee species is detected, the biologist shall notify CDFW immediately to determine appropriate avoidance and/or minimization measures.</p>	<p>City, City's biologist, and contractor</p>	<p>Reporting actions – Verify that protection measures are in final specifications; verify completion and documentation of surveys, if necessary</p> <p>Schedule – Pre-construction and during construction; verify peak flight season is avoided or surveys are conducted and applicable disturbance buffers and protection measures are implemented as necessary</p>	
Cultural Resources			
<p>MM CR-1: Requirement for a Cultural Monitor to Protect Cultural Resources</p> <ul style="list-style-type: none"> – A tribal monitor will be hired by the City or contractor prior to construction. – A tribal monitor will be onsite during grading and earthwork activities. Specific grading depths requiring a monitor will be clarified in writing with requesting tribal representatives prior to construction. – Tribal monitors will be empowered to halt heavy equipment operations in the event that significant cultural features or human remains are uncovered. Construction activities in the immediate vicinity will be delayed until a qualified archaeologist, has assessed the significance of the find. 	<p>City, City's archaeologist, and contractor, Tribal Cultural Resource Monitor</p>	<p>Reporting actions – Obtain contract with tribal monitor and incorporate monitoring protocols in final specifications; verify completion of tribal monitoring</p> <p>Schedule – Pre-construction and during construction; verify completion of tribal monitoring as detailed in MM CR-1</p>	
<p>MM CR-2: Inadvertent Discovery of Cultural Resources</p> <p>If cultural resources are encountered during construction activities, all onsite work shall cease in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist will be retained to evaluate and assess the significance of the discovery, and develop and implement an avoidance or mitigation plan, as appropriate. For discoveries known, or likely to be associated with Native American heritage (precontact sites and select historic period sites), tribal representative will also be contacted immediately to evaluate the discovery and, in consultation with the Project proponent, the City, and consulting archaeologist, develop a treatment plan in any instance where significant impacts cannot be avoided. Precontact materials that could be encountered include obsidian and chert debitage or formal tools, grinding implements (e.g., pestles, handstones, bowl mortars, slabs), locally darkened midden, deposits of shell, faunal remains, and human burials. Historic archaeological discoveries may include nineteenth century or early twentieth century farming machinery, building foundations, structural remains, or concentrations of artifacts made of glass, ceramics, metal, or other materials found in buried pits, wells, or privies.</p>	<p>City, City's archaeologist, and contractor.</p>	<p>Reporting actions – Verify inclusion of inadvertent discovery requirements in final plans and specifications; verify completion of DPR 523 forms, if necessary; verify completion of noticing as detailed in MM CR-2 upon inadvertent discovery and development of treatment plan as necessary</p> <p>Schedule – Pre-construction and during construction; verify adherence to protocols and notifications if inadvertent discovery occurs</p>	

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<p>MM CR-3: Inadvertent Discovery of Human Remains</p> <p>If human remains are discovered during project construction, work shall stop at the discovery location, within 66 feet, and any nearby area reasonably suspected to overlie adjacent to human remains (PRC, Section 7050.5). The Humboldt County Coroner will be contacted to determine if the cause of death must be investigated. If the Coroner determines that the remains are of Native American origin, it is necessary to comply with State laws relating to the disposition of Native American burials, which fall within the jurisdiction of the NAHC (PRC, Section 5097). The Coroner shall contact the NAHC. The descendants or most likely descendants of the deceased shall be contacted, and the descendants shall complete an inspection and/or make a recommendation within 48 hours of being notified. Work shall not resume at the discovery location and surrounding 66-foot buffer, until they have made a recommendation, or the 48 hours has passed, to the landowner or the person responsible for the excavation work for means of treatment and disposition, with appropriate dignity, of the human remains and any associated grave goods, as provided in PRC, Section 5097.98.</p>	<p>City, City's archaeologist, and contractor</p>	<p>Reporting actions – Verify inclusion of inadvertent discovery requirements in final plans and specifications</p> <p>Schedule – Pre-construction and during construction; verify adherence to protocols, document notifications if inadvertent discovery occurs.</p>	
Geology and Soils			
<p>MM GEO-1: Inadvertent Discovery of Paleontological Resources</p> <p>In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue or recommend salvage and recovery of the material if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they shall be properly curated and preserved</p>	<p>City and City's contractor</p>	<p>Reporting actions – Verify inclusion of inadvertent discovery requirements in final plans and specifications</p> <p>Schedule – Pre- and during construction; verify adherence to protocols if inadvertent discovery occurs</p>	
Greenhouse Gas Emissions			
<p>MM GHG-1: Offset Natural Gas Greenhouse Gas Impacts</p> <p>The following climate friendly Project features and operational practices shall be implemented:</p> <ul style="list-style-type: none"> – The Project shall be designed consistent with the 2022 Building Energy Efficiency Standards 	<p>City and City's contractor</p>	<p>Reporting actions – Verify requirements are included in final plans and specifications</p> <p>Schedule – Pre-construction, during construction, and post construction; verify completion of measures.</p>	

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<ul style="list-style-type: none"> - The Project shall include rooftop solar panels - The Project shall include passive and energy-efficient heating and cooling systems - The Project shall include short-term and long-term bicycle parking - The Project design will include facilities that support the maintenance of EVs and associated equipment, which may include indoor fleet parking with overnight charging stations; EV battery maintenance, safe-handling, and storage facilities; and similar features. - The City shall continue to provide employees with bus passes - The Project shall include showers - Operationally, the use of electrical utilities shall be prioritized over the use of natural gas utilities whenever feasible during non-emergency use. 			