Mitigation, Monitoring, and Reporting Program
Mendocino Unified School District Recycled Water System Project

SCH No. 2022020568

Best Management Practices (BMP) and Mitigation Measures (MM)	Monitoring Responsibility	Monitoring/Reporting Action & Schedule	Verification (Initials/Date)
Best Management Practices			
Implementation of Geotechnical Design Recommendations As part of the Project design process, the MUSD has engaged a California-registered Geotechnical Engineer to conduct a geotechnical investigation. The MUSD will design the Project to comply with the site-specific recommendations made in the geotechnical study. 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.	Mendocino Unified School District	Verify geotechnical study design recommendations are incorporated into final plans and professional inspection is performed during construction	
Aesthetics			
MM AES-1: Minimize Visual Impacts The MUSD shall reduce construction disturbance and ensure restoration of areas disturbed during construction. Measures shall include: – The size of construction zones and staging areas shall be the minimum operable size. The location of such zones shall be adjusted to minimize the visual impacts to surrounding residents. – Staging areas and other areas disturbed or scarred by construction activities shall be restored and revegetated, including restoring pre-Project topographic features and reseeding with species comparable to those removed or disturbed during construction and repaving, where areas were previously paved. – If trees are damaged or lost, trees shall be replaced at a minimum of a 1:1 ratio. – If trees are damaged or lost at the tank site on Little Lake Road, replacement trees shall be planted on-site to provide visual screening of the site from Little Lake Road and adjacent properties. – To the extent feasible, MUSD shall ensure that the proposed new tank is of a color that would minimize visual contrast and blend in with the surrounding landscape to increase screening of tank views from Little Lake Road and adjoining properties.	Mendocino Unified School District	Verify requirements are in final plans and specifications and implemented during construction Verify that the number of tree replacements needed have been calculated and planted Verify success of replacement planting	

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MM AES-2: Trenching Techniques to Minimize Tree Loss The MUSD shall retain a certified arborist to develop special trenching and pruning techniques to minimize the potential for tree impacts and tree loss along the alignment. The contractor shall implement such techniques. Construction activities within the dripline of trees adjacent to trenches shall be avoided to the extent feasible during construction. If pruning of trees is necessary, pruning shall be completed by either a certified arborist or by the contractor under supervision of either an International Society of Arboriculture qualified arborist, American Society of Consulting Arborists consulting arborist, or a qualified horticulturalist. Pruning shall be completed to the minimum degree necessary to accommodate construction vehicles and in a manner that helps preserve tree health. If trees are damaged or lost, trees shall be replaced. To the extent allowable, replacement trees shall be planted on-site.	Mendocino Unified School District	Verify requirements are in final plans and specifications and implemented during construction Check jobsite compliance as necessary	
Air Quality			
MM AQ-1: Dust Control Measures In accordance with Rule 1-430(b) of the Mendocino County Air Quality Management District Regulations, the MUSD and its Contractor shall implement the following airborne dust control measures during construction activities: – All visibly dry disturbed soil road surfaces shall be watered to minimize fugitive dust emissions. – All unpaved surfaces, unless otherwise treated with suitable chemicals or oils, shall have a posted speed limit of 10 miles per hour. – Earth or other material that has been transported by trucking or earth moving equipment, erosion by water, or other means onto paved streets shall be promptly removed. – Asphalt, oil, water, or suitable chemicals shall be applied on materials stockpiles and other surfaces that can give rise to airborne dusts. – All earthmoving activities shall cease when sustained winds exceed 15 miles per hour. – The operator shall take reasonable precautions to prevent the entry of unauthorized vehicles onto the site during non-work hours. – The operator shall keep a daily log of activities to control fugitive dust.	Mendocino Unified School District	Verify requirements are in final plans and specifications Check jobsite compliance as necessary	
Biological Resources			
MM BIO-1: Avoid Loss of Sensitive Plant Species The MUSD shall retain a qualified biologist to complete appropriate pre-construction surveys for special status plant species at the MUSD tank site prior to construction of the proposed	Mendocino Unified School District	Verify surveys are conducted prior to start of construction	

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recycled water tank. The surveys shall be conducted during the appropriate blooming time (spring or summer) for the target species. Survey methods shall comply with CDFW rare plant survey protocols, and shall be performed by a qualified field botanist. Surveys shall be modified to include detection of juvenile (pre-flowering) colonies of perennial species when necessary. Any populations of special status plant species that are detected shall be mapped. Populations (if present) shall be flagged if avoidance is feasible and if populations are located adjacent to construction areas. The locations of any special status plant populations to be avoided shall be clearly identified in the contract documents (plans and specifications). If avoidance is not feasible, a Special Status Plant Management Plan shall be prepared and implemented in coordination with CDFW, in which recommendations shall be provided as to the feasibility of relocating the plants or collecting seeds prior to the start of construction. The report shall identify similar habitat on nearby lands to accommodate both relocation and seed spreading. If seed collection is determined to be the more appropriate method for the specified species, seeds shall either be collected and spread on- or off-site, or provided to a local native plant nursery for propagation then planting. For both relocating or seed collection, the MUSD shall indicate an on- or off-site location for relocation, establish success criteria, identify monitoring protocol of the site for one to two seasons, and determine appropriate action if the success criteria is not met.		Verify Special-Status Plant Management Plan is prepared and implemented, if necessary	
MM BIO-2: Protect Northern Red Legged Frog and Sonoma Tree Voles In the event that a Northern red-legged frog is observed in an active construction zone, the contractor shall halt construction activities in the immediate area where observed and the frog shall be moved to a safe location in similar habitat outside of the construction zone by a CDFW approved, qualified biologist. The construction impact area at the MUSD tank site shall be surveyed by a qualified biologist within seven days prior to the start of construction for any tree nests indicative of Sonoma tree voles. If any active Sonoma tree vole nests are found, the nest shall be avoided during construction activities.	Mendocino Unified School District	Verify requirements are in final plans and specifications Verify completion of preconstruction survey	
MM BIO-3: Protect Bat Species If construction occurs during the bat maternity season (generally May 1st through August 30th), a qualified bat biologist shall conduct habitat surveys for special status bats for trees to be removed or limbed. The assessment shall evaluate the trees for suitable entry points and roost features and shall provide focused daytime surveys for day-roosting bats. If present, the roost shall be avoided until after September 1 to ensure no adverse effects to maternity bat roosts. Tree removal outside the maternity season shall be performed using a two-step tree removal process which includes allowing any felled trees or tree limbs to be left overnight prior to removal from the site or on-site chipping to allow any bats to exit the roost.	Mendocino Unified School District	Verify that protection and avoidance measures are in final specifications Verify completion of survey Verify that disturbance buffers and protection measures are implemented during construction	

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MM BIO-4: Prevent Disturbance to Nesting Birds Ground disturbance or removal of vegetation or nesting trees shall be conducted, if feasible, during the fall and/or winter months and outside of the avian nesting season (March 15 – August 15) to avoid any direct effects to special status and protected birds. If ground disturbance or vegetation removal cannot be confined to outside of the nesting season, a qualified ornithologist shall conduct pre-construction surveys within the vicinity of the Project 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 at minimum a one-day pre-construction 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 pre-construction survey before Project work is reinitiated. If active nests are detected within the vicinity of the construction footprint, the ornithologist shall flag a buffer around each nest (assuming property access is allowed). Construction activities shall avoid nest sites until the ornithologist determines that the young have fledged or nesting activity has ceased. Buffers shall be implemented as needed (buffer size dependent on species). In general, the buffer size for common species would be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. 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. If active nests are detected during the survey, the qualified ornithologist shall monitor all nests at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified ornithologist, disturb nesting activities (e.g., excessive noise), shall be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified ornithologist shall immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing speed limits, replacing and updating noisy equipment, queuing trucks to distribute idling noise, locating vehicle access points and loading and shipping facilities away from noise-sensitive receptors, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors.	Mendocino Unified School District	Verify that protection and avoidance measures are in final plans or specifications Verify that surveys are conducted prior to grading or ground disturbing activities during nesting season Verify that disturbance buffers are implemented during construction, if required	

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Cultural Resources			
MM CR-1: Avoid Loss of Street Trees on Historic Properties The MUSD shall avoid loss of street trees that occur along the pipeline alignment on the frontage of historic properties listed on the Town of Mendocino Inventory of Historic Resources. Tree loss shall be avoided by monitoring the proximity of trenching near tree roots, using construction equipment that minimizes the extent of required excavation, moving the pipeline alignment away from trees, or other effective measures.	Mendocino Unified School District	Verify requirements are in final plans and specifications and implemented during construction Check jobsite compliance as necessary	
MM CR-2: Minimize Impacts to Unknown Archaeological Resources During Construction The MUSD shall retain a qualified archaeologist to conduct a pre-construction cultural sensitivity training for Contractor staff prior to the start of construction. In the event that any subsurface archaeological features or deposits, including locally darkened midden soil, are discovered during construction-related earth-moving activities, all ground-disturbing activity in the vicinity of the resource shall be halted, a qualified professional archaeologist shall be retained to evaluate the find, and the appropriate tribal representative(s) shall be notified. If the find qualifies as a historical resource, unique archaeological resource, or tribal cultural resource as defined by CEQA, the archaeologist shall develop appropriate measures to protect the integrity of the resource and ensure that no additional resources are affected.	Mendocino Unified School District	Verify that protection and avoidance measures are in final plans or specifications Verify completion of preconstruction cultural sensitivity training for Contractor	
MM CR-3: Protect Human Remains if Encountered during Construction If human remains, associated grave goods, or items of cultural patrimony are encountered during construction, work shall halt in the vicinity of the find and the County Coroner shall be notified immediately. The following procedures shall be followed as required by Public Resources Code § 5097.9 and Health and Safety Code § 7050.5. If the human remains are determined to be of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of the determination. The Native American Heritage Commission shall then notify the Most Likely Descendant (MLD), who has 48 hours to make recommendations to the landowner for the disposition of the remains. A qualified archaeologist, the MUSD 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.	Mendocino Unified School District	Verify inclusion of language in final plans or specifications Verify completion of protection measures and notifications, if necessary	

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Hazards and Hazardous Materials			
MM HAZ-1: Reduce Wildland Fire Hazards during Construction Prior to construction, the MUSD and its contractor(s) shall remove and/or clear away dry, combustible vegetation from the construction site. Grass and other vegetation less than 18 inches in height above the ground shall be maintained where necessary to stabilize the soil and prevent erosion. Vehicles shall not be parked in areas where exhaust systems contact combustible materials. Fire extinguishers shall be available on the construction site to assist in quickly extinguishing any small fires. The contractors shall have on site the phone number for the local fire department(s).	Mendocino Unified School District	Verify that protection and avoidance measures are in final plans or specifications Check jobsite compliance as necessary	
Hydrology and Water Quality			
MM HYD-1: Implement Storm Water Control Measures During Construction The MUSD and its contractor shall implement appropriate Best Management Practices (BMPs) to prevent the discharge of construction waste, debris or contaminants during construction activities. A Water Pollution Control Plan (WPCP) shall be prepared for MUSD review and approval prior to construction. BMPs may include, but not necessarily be limited to, the following: – Existing vegetation within the construction area shall be maintained to the maximum extent feasible. – Areas of disturbed soil shall be restored as soon as possible after disturbance. – Erosion and sediment control devices shall be installed in coordination with construction activities. Such devices shall include sediment controls, stabilized construction exits, stockpile management, wind erosion control, and non-storm water management. – BMPs shall be implemented to prevent the release of hazardous construction chemicals during construction. Such BMPs shall include material handling and waste management, material stockpile management, management of any washout areas, control of vehicle/equipment fueling to contractor's staging area, vehicle and equipment cleaning performed off site, and spill prevention and control.	Mendocino Unified School District	Verify that protection and avoidance measures are in final plans or specifications Check jobsite compliance as necessary	
Transportation			
MM TR-1: Implement Traffic Controls During Construction The MUSD and its contractor shall implement traffic controls to reduce traffic conflicts within local and state roadways during construction to minimize disruption. A traffic control plan shall be prepared for MUSD review and approval prior to construction, which shall comply with Caltrans and Mendocino County encroachment permit requirements. All traffic control devices	Mendocino Unified School District	Verify requirement of traffic control plan is in final plans or specifications and is submitted for approval prior to construction	

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shall comply with the California Manual on Uniform Traffic Control Devices. Traffic controls may include, but not necessarily be limited to, the following: – During construction, at least one lane in each direction of roadways shall be kept open at all times. Through traffic shall be maintained at all times (e.g., through temporary signals, flaggers or other means). – Bicycle and pedestrian access shall be maintained at all times, using short signed detours around the construction zone if necessary. – Access to properties shall be maintained at all times, apart from extremely brief periods while construction work is passing through. Such exceptions shall be minimized as far as reasonably practicable. – Advance notification of construction work to the community and stakeholders shall be conducted to provide notice of work. – Construction work shall occur outside of peak travel hours as far as reasonably practicable. – Road and parking configurations shall be restored to pre-Project conditions.		Check jobsite compliance as necessary	
MM **TR-2: Notify Emergency Responders and Maintain Emergency Access** The MUSD and its contractor shall implement the following measures: – Access to driveways and public and private roads shall be maintained, as feasible, by using steel trench plates. If access must be restricted for brief periods (more than one hour), property owners shall be notified by MUSD in advance of such closures. – At locations where the main access to a nearby property is blocked, MUSD and the contractor shall be required to have ready at all times the means necessary to accommodate access by emergency vehicles to such properties, such as plating over excavations, short detours, and/or alternate routes. – Construction shall be coordinated with emergency service providers and administrators of land uses that may be more significantly affected by traffic impacts, such as fire stations, schools, hospitals, and ambulance providers. As construction progresses, emergency providers, and other land uses as mentioned above, shall be notified by MUSD in advance of construction of the timing, location, and duration of construction activities and the locations and durations of any temporary detours and/or lane closures.	Mendocino Unified School District	Verify requirement of traffic controls and emergency responder notifications is in final plans or specifications Check jobsite compliance as necessary	

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Tribal Cultural Resources			
MM TCR-1: Protect Tribal Cultural Resources during Construction Activities In the event that any subsurface features or deposits are discovered during construction, ground-disturbing activity in the vicinity of the resource shall be halted. The appropriate tribal representative(s) shall be notified, and a Native American monitor and a qualified professional archaeologist shall be retained to evaluate the find. If the find qualifies as a tribal cultural resource as defined by CEQA, the City shall ensure that appropriate actions to protect the resource are taken and that no additional resources are affected.	Mendocino Unified School District	Verify inclusion of language in final plans or specifications Verify completion of protection measures and notifications, if necessary	