

Exhibit A

Mitigation Monitoring and Reporting Program

Old Arcata Road Improvements Project

To avoid, reduce or mitigate significant effects resulting from the proposed Project, Public Resources Code Section 21081.6 requires that monitoring and reporting procedures take place through implementation of a Mitigation Monitoring and Reporting Program (MMRP). Table A-1 provides the MMRP for the proposed Project in accordance with those guidelines.

Mitigation, Monitoring, and Reporting Program

Old Arcata Road Improvement Project

SCH No. 2021010176

Table A-1 Mitigation Monitoring and Reporting Program

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
Environmental Protection Action						
EPA-Stormwater Pollution Prevention Plan (SWPPP) The Project will seek coverage under State Water Resources Control Board (Water Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The City will submit permit registration documents (notice of intent, risk assessment, site maps, Storm Water Pollution Prevention Plan (SWPPP), annual fee, and certifications) to the Water Board. The SWPPP will address pollutant sources, best management practices, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.	City of Arcata's Contractor	SWPPP Practitioner	Project construction	During Project construction activities, including during non-work times.	State standards	City of Arcata
Mitigation Monitoring						
3.1 Aesthetics						
MM AES-1 Minimize Temporary Visual Impacts The City shall avoid or substantially lessen impacts by reducing construction disturbance. Measures shall include:	City of Arcata	City of Arcata	Project construction	During Project construction	City standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
<p>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.</p> <p>To the extent feasible, alignments and locations of facilities shall be adjusted to avoid visually sensitive features and conditions that would result in major landform alteration or mature landscape removal.</p> <p>The City shall restore or revegetate staging areas disturbed by construction activities, including restoring pre-Project topographic features and reseeding with species comparable to those removed or disturbed during construction.</p>						
3.3 Biological Resources						
<p>MM BIO-1 Avoidance and Minimization Measures for Red-Legged Frogs</p> <p>Although Northern Red-legged Frog breeding is not documented in the project area, measures for this species are included because individual frogs may disperse for considerable distances and could enter construction areas. Mitigation Measure BIO-1 is proposed to minimize potential impacts to Northern Red-legged Frogs:</p> <p>The City shall retain a qualified biologist to perform a pre-construction survey for the Northern Red-legged Frog within 24 hours prior to commencement of ground disturbance within 50 feet of suitable Northern Red-legged Frog habitat. Suitable habitat will be determined by the City's qualified biologist. The biologist will relocate any specimens that occur within the work-impact zone to nearby suitable habitat.</p> <p>In the event that a Northern Red-legged Frog is observed in an active construction zone, the contractor shall halt construction activities in the area and the frog shall be moved to a safe location in similar habitat outside of the construction zone</p>	City of Arcata's biologist	City of Arcata	If impacts are unavoidable: Prior to the initiation of Project construction	Once, prior to Project construction	Federal and state standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
MM BIO-2 Protection of Special Status Plants <p>Pre-construction surveys: Seasonally appropriate pre-construction surveys for special status plant species shall occur prior to construction within the planned area of disturbance along Jacoby Creek Road between 2266 Jacoby Creek Road and 2332 Jacoby Creek Road 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 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 special status plant populations are detected where construction would have unavoidable impacts, the shoulder widening will be eliminated from the project at that location to avoid impacts to special status species.</p>	City of Arcata's biologist	City of Arcata	Prior to Project construction	Prior to Project construction	State standards	City of Arcata
MM BIO-3 Avoidance and Minimization Measures for Waters of the United States and Waters of the State <p>The City shall implement the following avoidance and protection measures for Waters of the United States and Waters of the State:</p> <ol style="list-style-type: none"> 1. The City shall attempt to avoid or minimize impacts to wetlands/waters to the greatest extent feasible in the final design plans. 2. Areas where wetlands are to be filled shall be clearly identified in the construction documents and reviewed by the City prior to issuing for bid. 3. ESA exclusion fencing shall be installed prior to construction to protect juxtaposed wetlands from inadvertent construction-related 	City of Arcata's biologist	City of Arcata	If surveys necessary: Prior to Project construction	Prior to and during Project construction	State standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
impacts. The locations of the ESA fencing shall be included on the final 100% design plan set for construction.						
MM BIO-4 Compensatory Mitigation for Wetland Impacts The City shall compensate for wetlands impacts through restoration, rehabilitation, and/or creation of wetland at a ratio of no less than 1:1.2 and to the satisfaction of the City and permitting agencies. A Wetlands Mitigation and Monitoring Plan shall be prepared in coordination with jurisdictional permitting agencies. Compensation for wetlands shall occur so there is no net loss of wetland habitat at ratios to be determined in consultation with and to the satisfaction of jurisdictional permitting agencies. Temporarily impacted wetlands shall be restored in place by the City following the close of construction. The Plan shall be acceptable to jurisdictional permitting agencies and include the following elements: proposed mitigation ratios; description and size of the restoration or compensatory area; site preparation and design; plant species; planting design and techniques; maintenance activities; plant storage; irrigation requirements; success criteria; monitoring schedule; and remedial measures. The Plan shall be implemented by the City.	City of Arcata	City of Arcata	48 hours prior to construction	During Project construction	State standards	City of Arcata
MM BIO-5 Remove Vegetation Outside of Nesting Bird Season The City would attempt to remove trees and other vegetation that could potentially contain nesting birds outside the bird nesting season (August 31st and February 1st).	City of Arcata's biologist	City of Arcata	If surveys necessary: Prior to Project construction	Prior to and during Project construction	State standards	City of Arcata
MM BIO-6 Conduct Nest Survey and Establish Buffers If vegetation removal or ground disturbance cannot be confined to work 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 ornithologist shall conduct a minimum of one day pre-construction survey within the 7-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance	City of Arcata	City of Arcata	Pre-construction	Pre-construction and possibly during Project construction (should construction	Federal and State standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
<p>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.</p> <p>If active nests are detected within the construction footprint or within the construction buffer established by the Project biologist, the biologist shall flag a buffer around each nest. 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 construction buffer, nest buffers would 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 California Department of Fish and Wildlife (CDFW). Buffer sizes would take into account factors such as (1) roadway and other ambient noise levels, (2) distance from the nest to the roadway and distance from the nest to the active construction area, (3) 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; (4) distance and amount of vegetation or other screening between the construction site and the nest; and (5) sensitivity of individual nesting species and behaviors of the nesting birds.</p> <p>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, placement of visual screens or sound dampening structures between the nest and construction activity, queuing trucks to distribute idling noise,</p>				activities lapse for seven days)		

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
locating vehicle access points and loading 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.						
3.4 Cultural Resources						
MM CR-1 Develop and Implement an MOU with Consulting Tribes The City shall develop a MOU with consulting tribes to that will include: When and where tribal and or archaeological monitors will be needed. Potential Preconstruction guided investigation needs that would occur prior to construction. Inadvertent discovery protocols and plans. The MOU shall be developed prior to construction and implemented throughout the duration of project construction.	City of Arcata t	City of Arcata	Pre-construction	Once, prior to Project construction	County standards	City of Arcata
3.6 Geology and Soils						
MM GEO-1 Inadvertent Discovery of Paleontological Resources If potential or paleontological resources are encountered during Project subsurface construction activities or geotechnical testing, all work within 50 feet of the find shall be stopped, and a qualified archaeologist funded by the City and approved by the City shall be contacted to evaluate the find, determine its significance, and identify any required mitigation. The applicant shall be responsible for implementing the mitigation prior to construction activities being re-started at the discovery site.	City of Arcata's Contractor	City of Arcata	Project construction	During Project construction	County standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)		Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
3.8 Hazards and Hazardous Materials							
MM HAZ-1 Evaluate and Manage Potential Contamination from “Roger’s Garage”	Historical records of previous borings would be reviewed (if available) to mitigate duplicate boring efforts. If existing data is insufficient to evaluate potential contamination of soils to be excavated with the Project Area, additional pre-construction borings would occur. If sampled soil is found to be impacted by ADL, petroleum hydrocarbons, or other regulated contaminants, a Construction Soil Groundwater Monitoring Plan (SGMP) would be prepared prior to any construction activities. During construction, the SGMP would be implemented.	City of Arcata	City of Arcata	Pre-construction	Duration of project construction	City and County Standards	City of Arcata
MM HAZ-2 Evaluate and Managed Aerially Deposited Lead	In areas of ground disturbance, pre-construction soil borings shall characterize lead concentrations in soil and groundwater in anticipation of construction activities. Once the areas of ground disturbance and potential dewatering are confirmed, a Preliminary Site Investigation (PSI) workplan shall identify location and number of borings necessary for pre-characterization and depth for sample collection. Historic soil boring information (if available) shall be reviewed to further define boring locations and mitigate duplicative borings. Laboratory analytical results of soil samples collected from the borings shall be utilized to ascertain whether health and safety concerns are present for construction workers and determine the potential for ADL impacted groundwater, and soil and/or groundwater handling and disposal options. Proposed soil borings and/or grab groundwater sample locations shall be determined following identification of the areas and depths of soil excavation and dewatering activities. If pre-construction TTLC soil characterization sampling indicates that concentrations of lead are elevated above 1,000 ppm, or if STLC analytical results are greater than 5 mg/l, then such data may indicate potential ADL impacts to groundwater.	City of Arcata	City of Arcata	Pre-construction	Duration of project construction	City and County Standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
<p>If construction activities include dewatering, and if laboratory analysis of pre-construction soil borings indicate elevated total and STLC concentrations of 1,000 ppm and 5 mg/L, respectively, then pre-construction groundwater characterization shall occur. If lead impacted soil or groundwater is identified during pre-construction characterization, then a SGMP shall be developed to identify protocols that should be utilized to proactively manage potentially impacted soil and groundwater within the Project alignment and reduce exposure to site workers.</p> <p>If pre-construction characterization indicates ADL impacts above STLC levels to soil and/or groundwater, site workers involved in excavation activities be trained in accordance with the Hazardous Waste Operations and Emergency Response (HAZWOPER) certification (Occupational Safety and Health Administration [OSHA] 1910.120).</p>						
3.9 Hydrology and Water Quality						
MM HWQ-1 Water Quality Control Measures During Excavation <p>In instances where excavation occurs within the vicinity of stream channels, flowing ditches, or wetted waters of the U.S. or State, erosion and sediment control measures shall be implemented. These measures shall include installation and maintenance of silt-fence along channel banks or wetted waters as specified in Project designs, and development of erosion control plans to prevent inadvertent sediment delivery</p>	City of Arcata's Contractor	City of Arcata	Project construction	Duration of Project construction	City and County standards	City of Arcata
3.11 Transportation						
MM TR-1 Maintain Emergency Access and Notify Emergency Responders <p>The City shall require contractors to provide adequate emergency access to all properties along the corridor during the construction process. At locations where the access to a nearby property is temporarily blocked, the contractor shall be required to have ready the means necessary to accommodate access by emergency</p>	City of Arcata's Contractor	City of Arcata	Project construction	Duration of Project construction	City and County standards	City of Arcata

Environmental Protection Actions (EPA) and Monitoring Measure (MM)	Individual Responsible for Monitoring and/or Reporting	Individual or Organization Responsible for Verifying Compliance	Timing of Initial Action	Frequency and/or Duration of Monitoring	Performance Criteria	Proposed Funding
vehicles to such properties, such as plating over excavations. As construction progresses, emergency providers shall be notified in advance of the timing, location, and duration of construction activities and the locations and durations of any temporary lane closures.						