

PAJARO VALLEY UNIFIED SCHOOL DISTRICT RENAISSANCE HIGH SCHOOL WATER SYSTEM IMPROVEMENTS PROJECT

MITIGATION MONITORING AND REPORTING PROGRAM

The Mitigation Monitoring and Reporting Program (“MMRP”) is a CEQA required component of the Mitigated Negative Declaration (“MND”) process for the Project (CEQA Guidelines §15074). Specifically, CEQA requires that lead agencies adopting MNDs take affirmative steps to determine that a project implements the approved mitigation measures subsequent to project approval (CEQA Guidelines §15074(d)).

As part of the CEQA environmental review procedures, Public Resources Code §21081.6 requires a public agency to adopt a monitoring and reporting program to ensure efficacy and enforceability of any mitigation measures applied to a proposed project. The lead agency must adopt an MMRP for mitigation measures incorporated into the project or proposed as conditions of approval. The MMRP must be designed to ensure compliance during project implementation. As stated in §21081.6(a)(1):

“The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead agency or a responsible agency, prepare and submit a proposed reporting or monitoring program.”

The MMRP is provided on the following pages. This table lists each of the mitigation measures proposed in the Initial Study/Mitigated Negative Declaration and specifies the agency responsible for implementation of the mitigation measure and the time period for the mitigation measure.

This Page Intentionally Left Blank

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
<p>Biological Resources: Impacts to Special Status Wildlife Species such as CTS, SCLTS, and CRLF During Construction</p>	<p>Mitigation Measure BIO-1: Every individual working on the Project must attend biological awareness training prior to working on the job site. The training shall be delivered by a qualified biologist and shall include, at minimum, information regarding the following:</p> <ul style="list-style-type: none"> a. Location and identification of sensitive habitats and all special-status species with potential to occur in the survey area including information specific to identifying the special-status species identified above, the habitat for these species, and the project specific measures being implemented to protect these species. b. The importance of avoiding impacts to special-status species and their habitat, and the steps necessary if any special-status species is encountered at any time. c. Identification of the limits of work, and project-specific avoidance measures and permit conditions that must be followed. <p>Mitigation Measure BIO-2: Disturbance of Monterey pine forest, oak woodland, and scrub vegetation and removal of native trees within these habitats shall be avoided to the maximum extent possible.</p> <p>Mitigation Measure BIO-3: Native vegetation that cannot be avoided shall be cut at ground level rather than removed by the roots when possible.</p> <p>Mitigation Measure BIO-4: Prior to commencement of construction, high visibility fencing and/or flagging shall be installed, with the assistance of a qualified biologist, to indicate the limits of work and</p>	<p>District, qualified biologist</p>	<p>Prior to and during construction</p>	<p>District</p>

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>the boundaries of sensitive habitat areas to be avoided.</p> <p>a. The limits of work shall be designated to avoid impacts to the surrounding Monterey pine forest, oak woodland, and scrub habitat, to the maximum extent possible and to maximize native tree and shrub vegetation.</p> <p>b. No work-related activity including equipment staging, vehicular access, grading and/or vegetation removal shall be allowed outside the designated limits of work.</p> <p>Mitigation Measure BIO-5: If any special-status species is identified in the project impact area at any time prior to or during construction, work shall cease immediately in the vicinity of the individual. The animal shall either be allowed to move out of harm's way on its own or a qualified biologist shall move the animal out of harm's way to a safe relocation site pursuant to all species-specific restrictions and regulations.</p> <p>Mitigation Measure BIO-6: During initial clearing, grubbing, and grading within the Monterey pine forest, oak woodland, and scrub habitat, a qualified biologist shall be present to conduct daily monitoring activities to ensure compliance with measures are in place for protection of special status species that may be encountered. After initial clearing, grubbing and grading has been completed, an alternate construction monitor may be trained and designated for execution of daily monitoring activities.</p> <p>Mitigation Measure BIO-7: Daily</p>			

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>monitoring by the project biologist or construction monitor shall occur for the duration of project construction within the Monterey pine forest, oak woodland, and scrub habitat. Daily monitoring activities shall include the following at minimum:</p> <ul style="list-style-type: none"> a. Monitoring the work area for the presence of special-status species and verifying that individuals are properly relocated out of harm's way as needed, pursuant to all species-specific restrictions and regulations. b. Monitoring the exclusionary fencing at the project site to verify good working condition and prevent wildlife entrapment. c. Checking under all equipment for wildlife before use. d. Verifying that at the end of each workday, all excavations shall be secured with a cover, or a ramp installed to prevent wildlife entrapment. e. All trenches, pipes, culverts or similar structures shall be inspected for animals prior to burying, capping, moving, or filling. <p>Mitigation Measure BIO-8: During project activities, all trash that may attract predators shall be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas.</p> <p>Mitigation Measure BIO-9: To avoid/minimize impacts to special-status amphibians, including CTS, SCLTS, and CRLF, the following measures shall be adhered to:</p> <ul style="list-style-type: none"> a. The project applicant will comply with the CESA and California Fish and 			

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>Game Code Section 5050 and will coordinate with the CDFW to determine whether incidental take authorization for CTS and SCLTS is required and/or authorized prior to issuance of a grading permit. If it is determined that authorization for the incidental take of these species is required and/or authorized from the CDFW, the project applicant will comply with the CESA to obtain a 2081 incidental take permit for CTS and/or comply with the California Fish and Game Code to obtain take authorization for SCLTS¹ from CDFW prior to the issuance of a grading permit. Permit requirements typically involve the preparation and implementation of a mitigation plan and mitigating impacted habitat at a 3:1 ratio through preservation and/or restoration. The project applicant would be required to retain a qualified biologist to prepare a mitigation plan, which will include, but is not limited to, identifying avoidance and minimization measures, and identifying a mitigation strategy that includes a take assessment, avoidance and minimization measures, compensatory mitigation lands, success criteria, and funding assurances. The project applicant would be required to implement the approved plan and any additional permit requirements.</p> <p>b. The project will comply with the ESA and conduct consultation with the USFWS to determine whether incidental take authorization for CTS, SCLTS, and CRLF is required prior to issuance of a grading permit. If it is determined that authorization for the incidental take of these species is required from the USFWS, the project will comply with the ESA to obtain Section 10 or GCP</p>			

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>authorization from USFWS at the project-level prior to the issuance of a grading permit. Take authorization for SCLTS must be initiated through the GCP described in Section 2.5.² Permit requirements typically involve the preparation and implementation of a mitigation plan and mitigating impacted habitat at a 3:1 ratio through preservation and/or restoration. The project applicant would be required to retain a qualified biologist to prepare a mitigation plan, which will include, but is not limited to, identifying avoidance and minimization measures, and identifying a mitigation strategy that includes a take assessment, avoidance and minimization measures, compensatory mitigation lands, success criteria, and funding assurances. The project applicant would be required to implement the approved plan and any additional permit requirements.</p> <p>c. A qualified biologist will survey the proposed work area and immediately adjacent areas 48 hours before and the morning of the onset of work activities for special-status amphibians. If any life stage of CTS, SCLTS, or CRLF is observed, construction activities will not commence until CDFW/USFWS is consulted and appropriate actions are taken to allow project activities to continue.</p> <p>d. During ground disturbing and vegetation removal activities, a qualified biologist shall survey appropriate areas of the construction site daily before the onset of work activities for the presence of special-status amphibians. The qualified biologist shall remain available to come to the site if a special-status amphibian is identified until all ground disturbing activities are completed. If any life stage</p>			

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>of CTS, SCLTS, or CRLF is found and these individuals are likely to be killed or injured by work activities, the qualified biologist shall be contacted, and work shall stop in that area until the special-status amphibian has moved on its own out of the work area and the USFWS has been contacted. Construction activities will not resume until the USFWS is consulted and appropriate actions are taken to allow project activities to continue.</p> <p>e. After ground disturbing and vegetation removal activities are complete, or earlier if determined appropriate by the qualified biologist, the qualified biologist will designate a construction monitor to oversee on-site compliance with all avoidance and minimization measures. The qualified biologist shall ensure that this construction monitor receives sufficient training in the identification of special-status amphibians. The construction monitor or the qualified biologist is authorized to stop work if the avoidance and/or minimization measures are not being followed. If work is stopped, the USFWS shall be notified. The qualified biologist and the construction monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the proposed project.</p> <p>f. Only tightly woven fiber netting or similar material may be used for erosion control at the project site. Coconut coir matting is an acceptable erosion control material. No plastic mono-filament matting will be used for erosion control, as this material may ensnare wildlife, including special-status amphibians.</p> <p>g. Because dusk and dawn are often the times when special-status</p>			

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>amphibians are most actively foraging and dispersing, all construction activities should cease one half hour before sunset and should not begin prior to one half hour after sunrise.</p> <p>h. To avoid or minimize impacts to special-status amphibians and their habitat, suitable habitat (i.e., ruderal areas, Monterey pine forest, oak woodland, scrub) shall be avoided to the greatest extent feasible. In addition to the high visibility fencing described in BIO -4, amphibian specific wildlife exclusion fencing will be installed around the perimeter of the project work area, where suitable habitat is present, to prevent special-status amphibians from migrating into the project area during the breeding season. A qualified biologist will supervise the installation of exclusion fencing. The status of the fencing will be monitored in accordance with BIO-4 above.</p> <p>Mitigation Measure BIO-10: Amphibian specific wildlife exclusion fencing will be installed around the perimeter of the project work area, where suitable habitat is present, to prevent special-status amphibians from migrating into the project area during the breeding season. A qualified biologist will supervise the installation of exclusion fencing. The status of the fencing will be monitored in accordance with BIO-4 above.</p>			
<p>¹ As described in Section 2.5, fully protected species may not be taken or possessed except with authorization from CDFW and only under specific circumstances, including maintenance, repair, or improvement projects to critical regional or local water agency infrastructure. Consultation with CDFW must occur to confirm that take authorization for SCLTS may be authorized under this exception; however, it is assumed that the project falls under the definition of critical local water agency infrastructure.</p> <p>² As described in Section 2.5, the GCP is intended to provide a permitting mechanism to meet statutory and regulatory requirements of the ESA for SCLTS, as well as CTS and CRLF. Consultation with USFWS must occur to confirm that take authorization for SCLTS, CTS, and CRLF may be authorized under the GCP; however, it is assumed that the project qualifies for GCP take authorization because the project is located within the GCP plan area, the project is being proposed by a public agency - the Pajaro Valley Unified School District, and involves the maintenance of existing public infrastructure (i.e., the existing RHS water system).</p>				

<p>Biological Resources: Impacts to SFDFW, a Special Status Wildlife Species, During Construction</p>	<p>See Mitigation Measures BIO-1 through BIO-8 above.</p> <p>Mitigation Measure BIO-10: To protect San Francisco dusky-footed woodrat, a qualified biologist shall implement the following protection measures:</p> <p>a. Within two weeks prior to commencement of development activities (including clearing and grubbing) a qualified biologist shall survey the project disturbance area to identify any woodrat nest locations that may be affected by the proposed development. All woodrat nests within the construction impact area and a 25-foot buffer shall be clearly flagged.</p> <p>b. If no woodrat nests are found during the survey, no further avoidance and minimization measures for this species are necessary.</p> <p>c. If woodrat nests are found, the construction contractor shall avoid the nests to the extent feasible by installing a 25-foot buffer with protective fencing or other material that shall prohibit encroachment. A reduction in the size of this buffer, or encroachment into this buffer, may be allowed if the biologist determines that microhabitat conditions such as shade, cover and adjacent food sources can be retained.</p> <p>d. If avoidance of woodrat nests is not possible, a qualified biologist shall develop and implement a Woodrat Relocation Plan to be implemented prior to the commencement of construction. The plan shall include the following:</p> <p>i. Trapping efforts and relocation activities shall not take place during low night temperatures (below 40 degrees Fahrenheit), inclement or extreme weather conditions.</p> <p>ii. If no San Francisco dusky-footed woodrats are captured at a given nest, it shall be dismantled by hand to ground</p>	<p>District, qualified biologist</p>	<p>Within two weeks prior to construction activities</p>	<p>District</p>
------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------	----------------------------------------------------------	-----------------

	<p>level, and the woody debris spread to reduce rebuilding.</p> <p>iii. For occupied nests, the existing woodrat nest shall be dismantled and the woody debris, including cached food and nesting material, carried to the nearest suitable relocation site outside the project footprint and used to build an artificial shelter.</p> <p>iv. Sites for artificial shelters shall be located as near as possible to the original nest location and no closer than 20 feet from existing woodrat nests and other artificial shelters. Choose the best available microhabitat, ideally in a location with sun and shade and if possible under the same species of tree or shrub as was present at the original nest location. Relocation sites shall contain biologically-suitable habitat features (e.g. stands of poison oak, coast live oaks, and dense native brush).</p> <p>v. When releasing woodrats, the occupied live-trap shall be placed against the entrance to the artificial shelter, opened, and the woodrat allowed to enter, ideally on its own accord. After the individual enters, the entrance shall be loosely but completely plugged with dirt and leaf duff to encourage it to stay, at least for the short-term.</p> <p>vi. If occupied nests were relocated, monitoring shall be conducted for 30 days after relocation is completed and include infrared and motion activated cameras, or other monitoring methods, and an occupancy assessment. A report on San Francisco dusky-footed woodrat nest monitoring shall be provided to County Environmental Planning within 30 days following the end of the monitoring period and shall include the methods and results of trapping and relocation, occupancy determinations, monitoring methods, and discussion of any remedies that may be</p>			
--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--	--	--

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
<p>Biological Resources: Impacts to Nesting Raptors and Other Nesting Avian Species During Construction</p>	<p>needed.</p> <p>Mitigation Measure BIO-11: To avoid/minimize impacts to nesting birds the following measures shall be adhered:</p> <p>a. If removal of trees/vegetation, grading activity, or other use of heavy equipment begins outside of the February 1 to August 31 breeding season, there will be no need to conduct a preconstruction survey for active nests.</p> <p>b. If removal of trees/vegetation, grading activity, or other use of heavy equipment is to commence between February 1 and August 31, a survey for active bird nests shall be conducted by a qualified biologist within two weeks prior to the start of such activity. The survey area shall include the survey area, and a survey radius around the survey area of 50 feet for MBTA birds and 250 feet for birds of prey.</p> <p>c. If no active nest of a bird of prey or MBTA bird is found, then no further avoidance and minimization measures are necessary.</p> <p>d. If active nest(s) of MBTA birds or birds of prey are found in the survey area, the following avoidance buffers shall be adhered to unless otherwise advised by CDFW or USFWS: Avoidance buffer of 50 feet for MBTA birds and 250 feet for birds of prey shall be established around the active nest(s). The biologist shall monitor the nest and advise the applicant when all young have fledged the nest. Removal of vegetation, grading activity, or other use of heavy equipment may begin after fledging is complete.</p> <p>e. If the biologist determines that a smaller avoidance buffer will provide adequate protection for nesting birds, a proposal for alternative</p>	<p>District, qualified biologist</p>	<p>Schedule construction after September 1 and before January 31.</p> <p>Alternatively, if construction scheduled between February 1 and August 31, conduct surveys no more than 14 days prior to the start of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August).</p>	<p>District</p>

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>avoidance/protective measures, potentially including a smaller avoidance buffer and construction monitoring, may be submitted to USFWS and CDFW for review and approval prior to removal of vegetation, grading activity, or other use of heavy equipment.</p> <p>f. If removal of vegetation, grading activity, or other use of heavy equipment stops for more than two weeks during the nesting season (February 1 - August 31) a new survey shall be conducted prior to re-commencement of construction.</p>			
<p>Biological Resources: Impact to Special Status Bat Species During Construction</p>	<p>See Mitigation Measures BIO-1 through BIO-8 above.</p> <p>Mitigation Measure BIO-12: To avoid/minimize impacts to special-status bats the following measures shall be adhered to:</p> <p>a. To the extent practical limbing/tree removal operations should occur between September 15 and November 1 to avoid bat maternity roosts and winter hibernacula. If tree limbing/tree removal operations must occur outside the period of September 15 through November 1 a survey for bats shall be conducted by a qualified biologist.</p> <p>b. Prior to commencement of construction related activities including tree trimming and removal, a qualified biologist shall conduct a pre-construction survey for bats as follows:</p> <p>i. The biologist shall determine if bats are utilizing the site for roosting. For any trees/snags/buildings that could provide roosting space for cavity or foliage-roosting bats, potential bat roost features shall be thoroughly evaluated to determine if bats are present. Visual inspection and/or acoustic surveys shall</p>	<p>District, qualified biologist</p>	<p>Prior to commencement of construction activities including tree trimming and removal</p>	<p>District</p>

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>be utilized as initial techniques.</p> <p>ii. If roosting bats are found, the biologist shall develop and implement acceptable passive exclusion methods in coordination with or based on CDFW recommendations. If feasible, exclusion shall take place during the appropriate windows (September 15 and November 1) to avoid harming bat maternity roosts and/or winter hibernacula. (Authorization from CDFW is required to evict winter hibernacula for bats).</p> <p>iii. If established maternity colonies are found, a buffer shall be established around the colony to protect pre-volant young from construction disturbances until the young are no longer reliant upon the roost for survival.</p> <p>iv. If a tree is determined not to be an active roost site for roosting bats, it may be immediately limbed or removed as follows:</p> <p>1. If foliage roosting bats are determined to be present, limbs shall be lowered, inspected for bats by a bat biologist, and chipped immediately or moved to a dump site.</p> <p>2. Alternately, limbs may be lowered and left on the ground until the following day, when they can be chipped or moved to a dump site. No logs or tree sections shall be dropped on downed limbs or limb piles that have not been in place since the previous day.</p>			
<p>Biological Resources: Impacts to Sensitive Habitats During Construction</p>	<p>See Mitigation Measures BIO-1 through BIO-12 above.</p> <p>Mitigation Measure BIO-13: To compensate for disturbance of sensitive habitats, and to comply with the Santa Cruz County General Plan Policy 5.1.12, the area of temporarily disturbed sensitive</p>	<p>District, qualified biologist</p>	<p>Prior to and during construction</p>	<p>District</p>

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>habitat shall be replaced in-kind at a minimum restoration to impact ratio of 1:1. A site-specific Habitat Restoration Plan shall be developed by a qualified biologist or restoration professional, and shall include the following minimum elements:</p> <p>a. Identification of areas on site where temporary disturbance and re-establishment of native habitat shall occur. All areas temporarily disturbed as a result of the project shall be restored to pre-project contours to the maximum extent possible and re-vegetated with native plant species appropriate to the habitat disturbed.</p> <p>b. A tree inventory assessment including the species, size, and locations of all trees intended for removal.</p> <p>c. All native trees removed shall be replaced in-kind at a minimum 1:1 ratio. Non-native trees removed shall be replaced at a minimum 1:1 ratio by native tree species appropriate to the surrounding habitat.</p> <p>d. A site-specific planting plan intended to inform the re-vegetation efforts. Local plant stock shall be used whenever possible. The plant pallet should include native species common to the surrounding native habitats that are being restored.</p>			
<p>Cultural Resources: Inadvertent Discovery of Cultural Resources During Construction</p>	<p>Mitigation Measure CR-1: If archaeological resources are unexpectedly discovered during construction, work shall be halted within 50 meters (±160 feet) of the find until it can be evaluated by a qualified professional archaeologist in collaboration with a Native American representative. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented by PVUSD in</p>	<p>District, qualified archaeologist</p>	<p>During construction</p>	<p>District, NAHC, County Coroner</p>

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	coordination with a qualified professional archaeologist in collaboration with a Native American representative.			
Cultural Resources: Inadvertent Discovery of Human Remains During Construction	Mitigation Measure CR-2: If human remains are unexpectedly discovered during construction, work shall be halted within 50 meters (±160 feet) of the find. The County Coroner shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code Section 5097 if the remains are determined to be of Native American origin. The Commission will designate a Most Likely Descendant who will be authorized to provide recommendations for management of the Native American human remains. (California Public Resources Code Section 5097.98; and Health and Safety Code Section 7050.5)	District, qualified archaeologist	During construction	District, NAHC, County Coroner
Noise: Short-Term Noise Increases in Vicinity of Construction Activities	Mitigation Measure NSE-1: All equipment shall be properly maintained and all internal combustion engine-driven equipment shall be equipped with intake and exhaust mufflers that are in good condition and appropriate for the equipment. Equipment engine shrouds shall be closed during equipment operations. The applicant shall require all contractors, as a condition of contract, to maintain and tune-condition all construction equipment to minimize noise emissions. Additionally, all stationary noise generating equipment (e.g., compressors) and equipment staging areas shall be located as far as possible from adjacent residential receivers. Mitigation Measure NSE-2: The project	District	During construction	District

Environmental Impact	Mitigation Measures	Implementing Party	Timing	Verifying Party
	<p>contractor shall designate a "disturbance coordinator" responsible for responding to any complaints about construction noise. The disturbance coordinator will be responsible for notifying neighboring residences of planned construction schedules at least 72 hours in advance. The disturbance coordinator's telephone number shall be posted at the project site and included in the notice. All noise complaints shall be sufficiently examined and promptly addressed.</p>			

This Page Intentionally Left Blank