

Summary Form for Electronic Document Submittal**Form F**

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: _____

Project Title: Little Lake Mobile Home Park Water System Improvements: North Main Street Pipeline Extension ProjectLead Agency: City of WillitsContact Name: Dusty Duley, Community Development DirectorEmail: dduley@cityofwillits.org Phone Number: (707) 459-7112Project Location: Willits Mendocino
City *County*

Project Description (Proposed actions, location, and/or consequences).

See attached Project Description

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

See attached Mitigation, Monitoring, and Reporting Program Plan

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

No known areas of controversy.

Provide a list of the responsible or trustee agencies for the project.

Not applicable

Project Description

A pipeline extension to serve the LLMHP would require the installation of approximately 1.1 miles of up to eight-inch pipeline along N Main Street. N Main Street used to be the main route of Highway 101 before a Highway 101 bypass was constructed around the City. Since the completion of the Highway 101 bypass, much of the N Main Street right-of-way (ROW) has been transferred to the County, and N Main Street is now primarily a County maintained roadway. However, the bridge over Upp Creek and a portion of the road to the south of the bridge is still maintained by the California Department of Transportation. The new pipeline would need to cross Upp Creek by connecting to the existing roadway bridge, which is located between the City limits and the LLMHP, or by jack and bore under Upp Creek. An access route at the intersection of North Main Street south of the bridge would be a part of the APE as well as an extended area east of the road to allow for jack and bore. It is anticipated that the majority of the pipeline would be under the roadway pavement or right off the shoulder of the roadway (between three to five feet from the edge of the pavement). Either open-cut or trenchless installation methods would be used for pipe installation. For segments of the pipeline that would require open-cut installation, this would require the cutting and rehabilitation of the pavement.

Pressures at the connection point are anticipated to be around 60 pounds per square inch (psi). The proposed LLMHP meter location is approximately 40 feet lower in elevation than the connection point to the City system, and it is anticipated that the City could deliver water to the LLMHP at pressures in the range of 60 psi to 80 psi without the need for a booster pump. The highest residential lot within the LLMHP is approximately 100 feet higher than the proposed City meter location.

In order to connect the LLMHP system to the City, the proposed Project is anticipated to involve the following project components:

- Approximately 6,000 feet of up to eight-inch polyvinyl chloride (PVC) pipe installed along/within N Main Street;
- Connection to existing 10-inch City water main;
- Up to eight-inch gate valve assemblies;
- Up to four-inch City meter and backflow prevention device at LLMHP property entrance;
- Attachment of pipeline to existing Upp Creek bridge;
- Three fire hydrants; and
- Minor onsite LLMHP distribution system modifications to connect system to new City meter.

Construction Schedule

Excavation during construction would generate spoils would be used as backfill ideally or, if necessary, hauled off-site to approved City or County locations. For all excavation in roadway areas, once filled and compacted, the roadways would be resurfaced to County standards. Excavations in bare ground areas would be resurfaced with hardscape (pavement or concrete) or revegetated with native grasses indigenous to the disturbed area or landscaped in accordance with County-approved building permit plans. The pipe installation would be within the existing road ROW, and accessibility and staging would be on the roadway; single-lane traffic control would be required and coordinated with the County during construction.

Construction of the proposed Project could require various equipment including, but not limited to, excavators, backhoes, front-end loaders, skid loader, compactors, double transfer trucks for soil

hauling, concrete trucks, concrete/industrial saws, rollers, and paving equipment. Equipment and staging areas for the construction activities would be stationed along the stretch of pipeline within County ROW or, for the sake of the on-site distribution improvements, within LLMHP-owned property. Construction activities would generally be limited to weekdays from 7 a.m. to 5 p.m. Nighttime construction is not expected to be necessary.

Project construction would involve the storage, use, and transport of small amounts of hazardous materials (e.g., asphalt, fuel, lubricants, and other substances) on roadways. Regulations governing hazardous materials transport are stated in Title 22 California Code of Regulations (CCR) and the California Vehicle Code (Title 13 CCR). The timing of the completed design and construction of the proposed Project is dependent on grant funding for the proposed Project. It is anticipated that the proposed Project would take approximately six months to construct.

Operation and Maintenance

The City would operate and maintain the new pipeline. Operations of the pipeline would be similar to its existing operations and maintenance (O&M) for City existing mains, consisting of standard, routine maintenance and inspections. These would be expected to be on as-needed basis.

CHAPTER 5 MITIGATION, MONITORING, AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been formulated based upon the findings of the IS/MND for the proposed Project in Mendocino County. The MMRP lists mitigation measures recommended in the IS/MND for the proposed Project and identifies monitoring and reporting requirements.

Table 5-1: Mitigation, Monitoring, and Reporting Program presents the mitigation measures identified for the proposed Project. Each mitigation measure is numbered with a symbol indicating the topical section to which it pertains, a hyphen, and the impact number. For example, AIR-2 would be the second mitigation measure identified in the Air Quality analysis of the IS/MND.

The first column of **Table 5-1: Mitigation, Monitoring, and Reporting Program** identifies the mitigation measure. The second column, entitled “When Monitoring is to Occur,” identifies the time the mitigation measure should be initiated. The third column, “Frequency of Monitoring,” identifies the frequency of the monitoring of the mitigation measure. The fourth column, “Agency Responsible for Monitoring,” names the party ultimately responsible for ensuring that the mitigation measure is implemented. The last columns will be used by the Lead and Responsible Agencies to ensure that individual mitigation measures have been complied with and monitored.

Table 5-1: Mitigation, Monitoring, and Reporting Program

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
Biological Resources						
General Project-Related Impacts						
BIO-1	(WEAP Training): Prior to initiating construction activities (including staging and mobilization), all personnel associated with project construction will attend a mandatory Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist (someone familiar with the identification and habitats of these species), to aid workers in identifying special status resources that may occur in the site. The specifics of this program will include identification of the sensitive species and suitable habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and mitigation measures required to reduce impacts to biological resources within the work area. This training will discuss special status species, describe the laws and regulations in place to provide protection of these species, identify the penalties for violation of applicable environmental laws and regulations, and include a list of required protective measures to avoid “take.” A fact sheet summarizing this information, along with photographs or illustrations of sensitive species with potential to occur on the site, will also be prepared for distribution to all contractors, their employees, and all other personnel involved with construction of the project. All trainees will sign a form documenting that they have attended WEAP training and understand the information presented to them. (This can be done in-person, via video, or in provided to construction personnel in written documentation format.)	Prior to initiating construction activities	Once, prior to initiating construction activities	City and Contractor with assistance of a qualified biologist	All trainees will sign a form documenting that they have attended WEAP training and understand the information presented to them	
BIO-2	(BMPs): The Project proponent will require that all workers employ the following best management	Prior to the start of and during any construction activities	Throughout Project construction duration	City and Contractor	Written reporting/photos if required by biologist in	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	practices (BMPs) in order to avoid and minimize potential impacts to special status species: • Vehicles will observe a 15-mph speed limit while on unpaved access routes. • All open trenches, holes, sumps, and other excavations greater than six inches with sidewalls steeper than 1:1 (45 degree) slope will have an escape ramp of earth or a non-slip material with a less than 1:1 slope or these will be covered with barrier material such that animals are unable to dig or squeeze under the barrier and become trapped. • Workers will inspect areas beneath parked vehicles, equipment, and materials prior to mobilization. If special status species are detected, the individual will either be allowed to leave of its own volition or will be captured by the qualified biologist (must possess appropriate collecting/handling permits or relevant experience) and relocated out of harm's way to the nearest suitable habitat beyond the influence of the Project work area. "Take" of a State or federal special status (rare, California Species of Special Concern, threatened, or endangered) species is prohibited without the necessary federal or State take permit(s). • The presence of any special status species will be reported to the Project's qualified biologist, who will submit the occurrence to the CNDDDB. If necessary, the biologist will report the occurrence to CDFW and/or USFWS.				accordance with requirements	
Project-Related Impacts to Special Status Plant Species						

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
BIO-3	(Focused Botanical Survey): Prior to Project activities occurring a qualified botanist/biologist (someone who can identify these species) will conduct focused botanical surveys during the appropriate blooming seasons for the Baker's meadowfoam (April – May), Baker's navarretia (April – July), Bolander's catchfly (May – June), Hooker's catchfly (spring to early summer), Milo Baker's lupine (June – September), and Nuttall's ribbon-leaved pondweed (July – August) according to CDFW's <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (2018) for all appropriate habitats for these species within the site.	Prior to Project activities and during appropriate blooming seasons	Once	City with assistance of a qualified biologist	Biological Memo	
BIO-4	(Avoidance): If special status plants are identified during a survey, an avoidance buffer and, if necessary, use of exclusion fencing, will be placed around the area as not to disturb the plants or its root system.	Upon discovery of any special status plants	During construction activities	City with assistance of a qualified biologist	Biological Memo	
BIO-5	(Formal Consultation): If rare plant individuals or populations are detected within Project works areas during the focused botanical surveys, and the plants cannot be avoided, the Project proponent will initiate consultation with CNPS (for CNPS-ranked species), CDFW (for California proposed, threatened, or endangered species), and/or USFWS (for threatened or endangered species) to determine next steps for salvage and relocation.	Upon discovery of any special status plants	During construction activities	City with assistance of a qualified biologist; consultation with CNPS, CDFW, and/or USFWS	Biological Memo	
Project-Related Mortality and/or Nest Abandonment of Migratory Birds, Raptors, and Special Status Birds						
BIO-6	(Avoidance): The Project's construction activities will occur, if feasible, between August 16 and January 31 (outside of the nesting bird season) to avoid impacts to nesting birds.	August 16 to January 31	Once, as determined by qualified biologist during construction activities	City with assistance of a qualified biologist	Biological Memo	
BIO-7	(Pre-Construction Surveys): If activities occur within the nesting bird season (February 1 to August 15), a qualified biologist (someone able to identify these	Ten days prior to the start of construction activities	Once, as determined by qualified biologist	City with assistance of a qualified biologist	Biological Memo	

Mitigation, Monitoring, and Reporting Program						
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	species) will conduct a pre-construction survey for active nests within ten (10) calendar days prior to the start of construction. It will be completed within the site, and up to 100 feet outside of the site for nesting migratory birds and up to 500 feet outside of the site for nesting raptors. Raptor nests are considered “active” upon the nest-building stage. If construction is delayed or halted for more than ten (10) days, another pre-construction survey for nesting birds will be conducted.		during construction activities; whenever construction is delayed or halted for more than 10 days, it will need to occur again			
BIO-8	(Northern Spotted Owl Surveys): If large diameter conifer trees are planned to be removed as a result of the Project, a qualified biologist (someone familiar with northern spotted owls and the survey requirements) will conduct northern spotted owl surveys prior to the start of the Project.	Prior to Project activities if large diameter conifer trees are to be removed	Whenever such trees are planned to be removed	City with assistance of a qualified biologist	Biological Memo	
BIO-9	(Avoidance Buffers): On discovery of any active nests or breeding colonies near work areas, a qualified biologist will determine appropriate avoidance buffer distances based on applicable CDFW and/or USFWS guidelines, the biology of the species, conditions of the nest(s), and the level of Project disturbance. If necessary, avoidance buffers will be identified with flagging, fencing, or other easily visible means, and will be maintained until the biologist has determined that the nestlings have fledged.	Upon discovery of any active nests or breeding colonies	During construction activities	City with assistance of a qualified biologist	Biological Memo	
Project-Related Mortality and/or Disturbance to Foothill Yellow-Legged Frog						
BIO-10	(Pre-Construction Take Avoidance Survey): A qualified biologist (someone familiar with the identification and habitat of this species) will conduct surveys for FYLF in accordance with CDFW’s <i>Considerations for Conserving the Foothill Yellow-Legged Frog</i> (California Department of Fish and Wildlife 2018), or current guidance for FYLF to determine if FYLF are within or adjacent to Upp Creek and the surrounding grassland habitat within the Project site. If no FYLFs are found during the pre-construction survey and no surface water is present in the Project site, work may commence without further surveys.	Prior to Project activities	Once, before construction	City with assistance of a qualified biologist	Biological Memo	

Mitigation, Monitoring, and Reporting Program						
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BIO-11	(FYLF Consultation and Avoidance): If any FYLF are found during preconstruction surveys or at any time during construction, consultation with CDFW and USFWS is warranted to determine if the Project can avoid take. CDFW recommends that initial ground-disturbing activities be timed to avoid the period when FYLF are most likely to be moving through upland areas (i.e., November 1 to March 31). When ground-disturbing activities must take place between November 1 and March 31, CDFW recommends that a qualified biologist monitor construction activity daily for FYLF.	During preconstruction surveys	Once, before construction; during ground-disturbing activities that take place between November 1 and March 31	City with assistance of a qualified biologist with consultation with CDFW and USFWS	Biological Memo	
BIO-12	(Monitor): If ground-disturbing activities must take place between November 1 and March 31, surface water is present during the preconstruction surveys, or if surface water becomes present at any time during the work period, the qualified biologist will conduct a pre-activity clearance survey each day and remain on the site to oversee initial vegetation clearing and ground disturbing activities within FYLF habitat.	Prior to any Project activities each day if between November 1 and March 31	Each day of Project activities	City with assistance of a qualified biologist	Biological Memo	
Project-Related Mortality and/or Disturbance to Northwestern Pond Turtle						
BIO-13	(Pre-Construction Survey and Avoidance Buffers): Within seven (7) days prior to the start of construction, a qualified biologist (someone familiar with the identification and habitat of this species) will conduct a pre-construction survey for northwestern pond turtle within Upp Creek and surrounding areas up to 330 feet. Pre-construction surveys will be conducted in accordance with the draft Western Pond Turtle (<i>Emys marmorata</i>) Visual Survey Protocol for the Southcoast Ecoregion (United States Geological Survey 2006), or current guidance. If no northwestern pond turtles are observed during the pre-construction survey, then construction activities may begin. If construction is delayed or halted for more than seven (7) days, another pre-construction survey for northwestern pond turtle will be conducted. If the surveys result in the identification of a northwestern pond turtle or an	Seven days prior to the start of construction activities	Once, as determined by qualified biologist during construction activities; whenever construction is delayed or halted for more than seven days, it will need to occur again	City with assistance of a qualified biologist	Biological Memo	

Mitigation, Monitoring, and Reporting Program						
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	individual is found on the site during construction activities, it will be allowed to leave the site on its own and the qualified biologist will determine appropriate buffers to be implemented to avoid impacts to the individual(s).					
BIO-14	(Monitor): If northwestern pond turtles are observed on the site, a qualified biologist will conduct a pre-activity clearance survey each day and remain on the site to oversee all initial vegetation clearing and ground disturbing activities in this species habitats and until the individual(s) have left the site.	Upon observance of NPT	During construction	City with assistance of a qualified biologist	Biological Memo	
BIO-15	(Formal Consultation): Should northwestern pond turtles get listed in this area and the Project/qualified biologist needs to move an individual, consultation for protection plans and/or relocation plans with the appropriate agencies will be completed to avoid take.	If NPT get listed in the area and an NPT is observed	During construction	City with assistance of a qualified biologist	Consultation for protection plans and/or relocation plans with the appropriate agencies	
Project-Related Mortality and/or Disturbance to Red-Bellied Newt						
BIO-16	(Rainfall Avoidance): The National Weather Service 72-hour forecast will be monitored for the site. During rainfall events and/or when a 50 percent or greater chance of rainfall is predicted within 72 hours, all work will be stopped in the site where initial ground disturbance (vegetation removal, grading, grubbing, and excavation) has yet to occur until the rainfall ceases and a zero percent chance of rain is forecast. Work may continue during rainfall events and/or when a 50 percent or greater chance of rain is forecast within portions of the site that have already been cleared of vegetation.	Daily weather forecast viewing when parts of the site are still to be initially disturbed	During Project activities until all initial ground disturbance is completed	Contractor and City	Documentation of 72-hour weather forecast	
BIO-17	(Pre-Construction Take Avoidance Survey): A qualified biologist (someone familiar with the identification and habitat of this species) will conduct visual surveys for red-bellied newt within Upp Creek during the breeding season (late February to May, peaking in March). Additionally, a qualified biologist will check under vegetation and stones within the site within seven (7)	Prior to construction	Visual surveys during breeding season and also within seven days of construction	City with assistance of a qualified biologist	Biological Memo	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	days of construction to check for terrestrial adults. If no red-bellied newt are found during the pre-construction survey and no surface water is present in the Project stie, work may commence without further surveys.					
BIO-18	(Monitor): If red-bellied newt are observed on the site, a qualified biologist will conduct a pre-activity clearance survey each day and remain on the site to oversee all initial vegetation clearing and ground disturbing activities in this species habitats and until the individual(s) have left the site.	Prior to each day's construction activities	Prior to each day's construction activities	City with assistance of a qualified biologist	Biological Memo	
Project-Related Mortality and/or Disturbance to Sonoma Tree Vole						
BIO-19	(Tree Avoidance): Douglas fir trees on the Project site will be avoided.	Prior to Project activities	Throughout construction	Contractor and City	Contractor to account for pre-Project and post-Project construction Douglas fir trees	
BIO-20	(Take-Avoidance Survey): If Douglas fir trees will be removed, a specialist for Sonoma tree voles will complete a survey to determine presence or absence of the species in the tree(s). If it is determined no Sonoma tree voles are utilizing the tree(s), the tree(s) will be removed within two days of the survey.	If Douglas fir trees are to be removed	Two days before Douglas fir tree(s) removed	City, Contractor, and Sonoma tree vole specialist	Report from specialist	
BOI-21	(Sonoma Tree Vole Take Authorization): If it is determined Sonoma tree voles are utilizing the tree(s), and avoidance is not feasible the Project will consult with CDFW to acquire an Incidental Take Permit for Sonoma tree vole prior to beginning any Project activities.	If Douglas fir trees are to be removed and Sonoma tree voles are using the trees	Any Douglas fir trees to be removed	City and qualified biologist with consultation with CDFW	Acquisition of ITP	
Project-Related Mortality and/or Disturbance to Steelhead-Northern California DPS Winter-Run						
BIO-22	(Water Quality): Erosion control measures will be utilized to prevent any sediment or hazardous fluids from entering Upp Creek.	Prior to Project activities	Throughout ground disturbance activities	Contractor and City	Completion of erosion control measures	
BIO-23	(Avoidance): No impacts will occur to Upp Creek during Project activities.	Throughout Project activities	Throughout Project activities	Contractor and City	Documented no impacts to Upp Creek	

Mitigation, Monitoring, and Reporting Program						
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BIO-24	(Formal Consultation): If impacts will occur within Upp Creek, consultation for steelhead protection plans and/or relocation plans with the appropriate agencies will be completed to avoid take.	If impacts are to occur to Upp Creek	Before impacts to Upp Creek if to occur	City with assistance of qualified biologist	Consultation with steelhead protection plans and/or relocation plans	
Project-Related Impacts to Regulated Waters, Wetlands, and Water Quality						
BIO-25	(Permits): If the proposed Project intends to impact jurisdictional waters, permits with USACE, RWQCB, and/or CDFW will be obtained to comply with State and federal regulations, if necessary. These permits, certifications, and agreements would ensure impacts to waters are minimized to the extent possible and permanent impacts would be offset by compensatory mitigation.	If impacts to occur to jurisdictional waters, monitoring to occur beforehand	Prior to any identified impacts to jurisdictional waters	Contractor and City	Acquisition of necessary permits, certifications, and/or agreements	
Project-Related Impacts to Wildlife Movement Corridors and Native Wildlife Nursery Sites						
BIO-26	(Operational Hours): When possible, construction activities surrounding Upp Creek should be limited to a half hour after sunrise through a half hour before sunset to reduce potential impacts to wildlife movement corridors and wildlife nursery sites.	During construction activities surrounding Upp Creek	Each day construction around Upp Creek is to occur	Contractor and City	Contractor construction hours documentation	
BIO-27	(Wildlife Access): Access within these areas should not be blocked outside of construction hours or during overnight hours or weekends. If construction must block both sides of a wildlife access route, an alternative route through the construction area should be identified by a qualified biologist and maintained throughout the construction schedule timeframe.	After construction concludes each day	Any time a movement corridor could be blocked during construction	Contractor, City, and qualified biologist	Contractor documentation and/or biologist report	
Cultural Resources						
CUL-1	(Contractor Awareness Training): The City or Contractor shall ensure that a Contractor Awareness Training Program is delivered to train equipment operators about cultural resources. The program shall be designed to inform construction personnel about: federal and State regulations pertaining to cultural resources and tribal cultural resources; the subsurface indicators of resources that shall require a work stoppage; procedures for notifying the Lead Agency of any	Prior to construction	Once	City and Construction Manager with assistance from a qualified archaeologist	Sign in sheet	

Mitigation, Monitoring, and Reporting Program						
Item	Mitigation Measure	When Monitoring is to Occur	Frequency of Monitoring	Agency Responsible for Monitoring	Method to Verify Compliance	Verification of Compliance
	occurrences; Project-specific requirements and mitigation measures; and enforcement of penalties and repercussions for non-compliance with the program. The training shall be prepared by a qualified professional archaeologist and may be provided either through a brochure, video, or in-person tailgate meeting, as determined appropriate by the qualified professional archaeologist. The training shall be provided to all construction supervisors, forepersons, and operators of ground-disturbing equipment. All personnel shall be required to sign a training roster. The Construction Manager is responsible for ensuring that all required personnel receive the training. The Construction Manager shall provide a copy of the signed training roster to the lead agency as proof of compliance.					
CUL-2	(Archaeological Monitoring): Prior to the start of construction that is within 100 feet of an identified cultural resource, such as P-23-5465, the proposed Project proponent shall retain a qualified professional archaeologist (Monitoring Archaeologist) to monitor all ground-disturbing activities associated with Project construction within 100 feet of the identified resource. The Monitoring Archaeologist shall meet or work under the direct supervision of someone meeting the Secretary of the Interior's professional qualifications standards for prehistoric and historic archaeology. The Monitoring Archaeologist shall have the authority to temporarily halt ground-disturbing or construction-related work within 100 feet of any discovery of potential historical or archaeological resources in order to address unanticipated discoveries.	Prior to the start of construction if within 100 feet of an identified cultural resource and by the existing bridge over Upp Creek	Daily when construction occurs, if within 100 feet of an identified cultural resource and by the existing bridge over Upp Creek	City with qualified monitoring archaeologist	Cultural Memo	
CUL-3	(Archaeological Remains): Should archeological remains or artifacts be unearthed during any stage of project activities, work in the area of the discovery shall cease until the area is evaluated by a qualified archaeologist.	Daily during construction activities	Continuously	City		

Mitigation, Monitoring, and Reporting Program						
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	If mitigation is warranted, the Project proponent shall abide by recommendations of the archaeologist.					
CUL-4	(Human Remains): In the event that human remains are discovered on the Project site, the Mendocino County Coroner must be notified of that discovery (Health and Safety Code Section 7050.5) and all activities in the immediate area if the find or in any nearby area reasonably suspected of overlie adjacent human remains must cease until appropriate and lawful measures have been implemented. If the Coroner determines that the remains are not recent, but rather of Native American origin, the Coroner shall notify the Native American Heritage Commission (NAHC) in Sacramento within 24 hours to permit the NAHC to determine the most likely descendent of the deceased Native American.	Daily during construction activities	Continuously	City		
Tribal Cultural Resources						
See CUL-1, CUL-2, CUL-3, and CUL-4.						