

## Memorandum

**Subject: State Streets Infrastructure Project Initial Study/Mitigated Negative Declaration (SCH No. 2019119018) – Consideration of Comments Received during the Public Review Period**

Date: December 20, 2019

To: Amber Wallace and Candido Ramirez – City of West Sacramento

From: Debra Lilly – Horizon Water and Environment

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### INTRODUCTION

This memorandum has been prepared to summarize the comments received by the City of West Sacramento (City) on the Initial Study/Mitigated Negative Declaration (IS/MND) for the State Streets Infrastructure Project (Proposed Project). An IS/MND is an informational document prepared by a Lead Agency – in this case, the City – that provides environmental analysis for public review. The IS/MND analyzed the impacts resulting from the Proposed Project and, where applicable, identified mitigation measures to reduce the impacts to less-than-significant levels.

This memorandum summarizes the public review process undertaken for the IS/MND, identifies the next steps in the California Environmental Quality Act (CEQA) process, summarizes the comments received, and provides responses to those comments.

### CEQA PROCESS

In accordance with Section 15073 of the State CEQA Guidelines, the City submitted the IS/MND to the State Clearinghouse for a 30-day public review period starting November 6, 2019. In addition, the City circulated a Notice of Intent to Adopt the IS/MND to interested agencies and individuals, including the Colusa County Clerk. The public review period ended on December 5, 2019. During this review period, comments were received from 11 individuals or groups, as listed in Table 1.

In accordance with State CEQA Guidelines Section 15074(b), the City must consider the IS/MND together with comments received during the public review process prior to adopting the IS/MND. The State CEQA Guidelines do not require the preparation of responses to comments for negative declarations; however, this memorandum has been prepared to document that the comments received do not affect the IS/MND's conclusions that the Proposed Project would not have any significant effects on the environment.

**Table 1. Comment Letters Received on the IS/MND**

<b>Comment Letter</b>	<b>Commenter</b>	<b>Affiliation</b>	<b>Date Sent</b>
1	Kristin Baer	Resident	November 7, 2019
2	Barbara Mannering	Resident	November 8, 2019
3	Andy Benzinger	Resident	November 11, 2019
4	Yolanda Vo Silverio	Resident	November 14, 2019
5	Andrea Meier	Resident	November 14, 2019
6	Margaret Goerig	Resident	November 16, 2019
7	Sean O’Callaghan	Resident	November 19, 2019
8	Tara Mirel	Resident	November 20, 2019
9	Anna Starkey	United Auburn Indian Community	November 26, 2019 (email) / December 10, 2019 (hard copy)
10	Matthew James	Yocha Dehe Wintun Nation	December 2, 2019
11	Scott Morgan	State Clearinghouse	December 6, 2019
12	Gavin McCreary	California Department of Toxic Substances Review	December 10, 2019 (email) / December 16, 2019 (hard copy)

At the time of approval of the IS/MND, the City will also adopt a Mitigation Monitoring and Reporting Program (MMRP) for those mitigation measures identified in the IS/MND. The MMRP is provided as an attachment to this memo. Within five days following IS/MND approval, the City must file a Notice of Determination (NOD) with the State Clearinghouse and the Yolo County Clerk-Recorder. A resolution approving the IS/MND and adopting the MMRP, and an NOD, will be prepared for the City’s use in this process. This resolution will confirm that the City Council has received and reviewed the IS/MND pursuant to the provisions of CEQA and makes the following findings:

1. Prior to taking action on the IS/MND and MMRP for the Proposed Project, the City read and considered said IS/MND.
2. The IS/MND and MMRP are based on independent judgment exercised by the City.
3. The IS/MND and MMRP were prepared and considered in accordance with the requirements of CEQA.
4. Considering the record as whole, and with incorporation of the mitigation measures, there is no substantial evidence that the Proposed Project will have a significant effect on the environment.

5. The City Manager is the custodian of the records of the proceedings on which this decision is based. Records are held at the City Capital Projects and Transportation Department offices located at 1110 West Capitol Avenue, First Floor, West Sacramento.

The resolution will identify that based on the above findings, the City Council approves the IS/MND, adopts the MMRP, and directs staff to file the NOD.

### **COMMENTS RECEIVED ON THE IS/MND**

During the public review period, the City received comments on the IS/MND from 11 individuals or groups (Table 1). These comments are summarized below.

#### **Comment 1 – Kristin Baer**

The commenter requested clarification about whether Vermont Avenue would be included in the project area.

**Response to Comment 1:** Vermont Avenue is included in the project area.

#### **Comment 2 – Barbara Mannering**

The commenter requested clarification about whether Vermont Avenue would be included in the project area and notes concerns about water pressure.

**Response to Comment 2:** Vermont Avenue is included in the project area for sewer rehabilitation. The water main in that area was last replaced in 1998, whereas this project focuses on replacing the water lines that are still original construction. The commenter's concerns regarding water pressure and water meter defects have been referred to the City's Public Works staff.

#### **Comment 3 – Andy Benzinger**

The commenter suggests that PG&E should underground power lines as part of this project, as is required for new construction.

**Response to Comment 3:** Undergrounding of overhead power lines would need to be accomplished by PG&E as they are the owners of that infrastructure. The Proposed Project would be conducted by the City, which does not have authority over PG&E infrastructure.

Of note, the City Council on October 16, 2019, approved the City of West Sacramento joining the Valley Clean Energy Alliance Joint Powers Agency. That action can be reviewed at the following web page: <https://www.cityofwestsacramento.org/government/meetings-agendas/city-council>

#### **Comment 4 – Yolanda Vo Silverio**

The commenter notes that motorists drive through the stop sign at the intersection of Park Boulevard and 15th Street/Westacre Road and suggests that a roundabout similar to the one that already exists on Park Boulevard and 16th Street could be built as part of this project to slow traffic.

**Response to Comment 4:** The State Streets Infrastructure Projects are focused on rehabilitating existing streets, water lines, and sewer lines that are at the end of their useful life. Installing a

round-about at 15<sup>th</sup> Street and Park Boulevard does not fall into the focus of this project. The request has been referred to the City's Traffic Request Process.

**Comment 5 – Andrea Meier**

The commenter addresses several topics:

- (a) Nighttime work should be strictly prohibited due to noise and light pollution. The text on page 3-7 implies that night work could occur.
- (b) The City should coordinate with PGE and ATT to avoid construction conflicts with these utilities.
- (c) The commenter's residence in the 1000 block of Park Boulevard experiences sewer backups at the street connector. The commenter inquires whether this area would be included in the sewer rehabilitation project.
- (d) The commenter encourages the planting of native shrubs and small trees like toyon and western redbud, which are drought tolerant and provide some complexity of perching habitat for birds.
- (e) The commenter appreciates the City's efforts to minimize tree removal in the project area and suggests a focus on planting valley oaks for mitigation.

**Response to Comment 5:**

- (a) The project description explains that construction activities would typically be performed Monday through Friday between 7:00 a.m. and 7:00 p.m., as allowed by City ordinance. Work on Saturdays, Sundays, and state holidays may be permitted on a case-by-case basis at the discretion of the City. At this time, no nighttime work is anticipated.
- (b) City staff and contractors are required to notify underground utility companies before beginning construction work that involves excavation.
- (c) The proposed sewer rehabilitation activities include the mainline for the residents on the 1000 block of Park Boulevard up to Jefferson. The City would also provide the maintenance crews with the appropriate equipment to find and clear sewer issues in the mainlines and lower laterals. Current sewer-related issues will be forwarded to the Public Works department.
- (d) Revegetation as a result of project activities would be limited to replacement of trees that require removal. Most of the disturbed areas would be within street or sidewalk areas where additional vegetation would not be appropriate. The City has a standard construction requirement that any landscaping vegetation harmed by contractors would be replaced with plants chosen by the property owner, and native shrubs would be an option.
- (e) As described in Mitigation Measure BIO-3b, the City's list of replacement trees includes Emerald Sunshine (*Ulmus propinqua*), Golden Rain (*Koelreuteria paniculata*), Trident maple (*Acer buergerianum*), Texas red oak (*Quercus buckleyi*), Deodar cedar (*Cedrus deodara*), or Cork Oak (*Quercus suber*). Valley oak and redbud are also included on the City's list. These trees have been selected because they are drought resistant and utility-friendly (i.e., their height and branching structure are not likely to interfere with power lines, and their root system is not likely to affect underground pipelines or sidewalks).

**Comment 6 – Margaret Goerig**

The commenter requests clarification about whether the orangeburg piping at the intersection of Delaware Avenue with the public sewer main will be replaced. Clarification is also requested about the beginning date for sewer rehabilitation activities, and the impact of those activities on access to residences during construction. The commenter notes that new street paving on Delaware Avenue is needed to address potholes, especially near 17<sup>th</sup> Street.

**Response to Comment 6:** The City plans to line or replace as many lower laterals as possible within the available budget. Laterals made of orangeburg and those that are collapsed would be the top priorities. Construction is estimated to begin in late winter 2020 and end in fall 2020, with sewer repairs in the first month or two, followed by replacement of water lines. Residents may have limited sewer or water service for 4 hours twice during the construction period and will be notified in advance via door hanger of the specific day and time. After the water and sewer projects are complete, the City will rehabilitate the streets.

**Comment 7 – Sean O’Callaghan**

The commenter requests information about whether the area of 18<sup>th</sup> Street and Maryland Avenue will be affected by the upcoming plans to replace water main and sewer lines in the neighborhood. In addition, the commenter asks whether the projects will only involve city lines located under streets and sidewalks, or possibly will include connection lines running under front lawns/driveways to individual properties.

**Response to Comment 7:** Water lines in the area of 18<sup>th</sup> Street and Maryland Avenue were replaced in 1998. This project would replace only those water lines and water connections to the meter that are still original. Sewer laterals in the area may be affected, depending on the budget and the condition of the lateral. The City would only replace the lateral to the cleanout or 3 feet behind the sidewalk. Any required work beyond that point would be the responsibility of the property owner.

**Comment 8 – Tina Mirel**

The commenter suggests constructing a new sidewalk on Vermont Avenue between Stone Boulevard and 19<sup>th</sup> Street.

**Response to Comment 8:** The State Streets Infrastructure Projects are focused on rehabilitating existing streets, water lines, and sewer lines that are at the end of their useful life. Installing new sidewalks on Vermont Avenue between Stone Boulevard and 19<sup>th</sup> Street does not fall into the focus of this project. Improvements of this type would be conducted through the City’s Sidewalk Assessment District, assuming the project would have full support from the homeowners. The City will investigate this potential improvement project.

**Comment 9 – Anna Starkey, United Auburn Indian Community**

The commenter provides several comments on behalf of the United Auburn Indian Community (UAIC):

- (a) UAIC requests to be notified when the project commences in order to view exposed soils at the project site.

- (b) In Mitigation Measure CR-2, UAIC recommends that the stop-work radius be modified from a 50-foot to a 100-foot radius to ensure the horizontal extent of the resource can be examined fully.
- (c) Also in Mitigation Measure CR-2, addressing lines 30-31, UAIC states that it is inappropriate for a site to be evaluated only by an archaeologist and requests that this mitigation measure be revised to include traditionally and culturally affiliated tribes in the evaluation process.

**Response to Comment 9:**

- (a) The City will contact UAIC to schedule a site visit when construction activities begin.
- (b) As requested by UAIC, the stop-work radius in Mitigation Measure will be modified from a 50-foot to a 100-foot radius to ensure the horizontal extent of the resource can be examined fully.
- (c) UAIC's comment related to lines 30-31 of Mitigation Measure CR-2 is noted. Lines 21-26 in the previous paragraph explain that both "a qualified archaeologist" and "a Native American representative from a traditionally and culturally affiliated tribe" will be contacted in the event that "subsurface archaeological features or deposits" are encountered. The paragraph beginning on line 28 addresses "cultural resources," intended to refer to historic-era resources. The text on line 28 will be revised to clarify, as follows:

All cultural resources accidentally uncovered during construction within the project site shall be evaluated for eligibility for inclusion in the CRHR. Resource evaluations will be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology and a Native American representative of a traditionally and culturally affiliated tribe, as appropriate.

**Comment 10 – Matthew James, Yocha Dehe Wintun Nation**

The Yocha Dehe Wintun Nation has provided a form letter requesting detailed project information and a copy of the cultural resources report for the project.

**Response to Comment 10:** As indicated in Sections 3.5, "Cultural Resources," and Section 3.17, "Tribal Cultural Resources," of the IS/MND, the City has worked closely with Laverne Bill, Cultural Resources Manager for the Yocha Dehe Wintun Nation, throughout the environmental review and AB 52 process. No additional response is necessary.

**Comment 11 – Scott Morgan, State Clearinghouse**

The State Clearinghouse indicates that the comment period for the State Streets IS/MND has ended and no state agencies submitted comments.

**Response to Comment 11:** The letter notes the official close of the public review period for the IS/MND. No response is necessary.

**Comment 12 – Gavin McCreary, California Department of Toxic Substances Control**

The commenter provides several comments on behalf of the California Department of Toxic Substances Control (DTSC):

- (a) DTSC requests that the IS/MND acknowledge the potential for release of hazardous wastes or substances.
- (b) DTSC notes that surveys for hazardous building materials should be conducted if structures would be demolished as part of the Proposed Project.
- (c) DTSC provides information about sampling of soil imported for backfilling excavated areas.
- (d) DTSC provides information about investigation of pesticide use.

**Response to Comment 11:**

- (a) Impact discussions 3.9(a) and 3.9(b) in Section 3.9, “Hazards and Hazardous Materials,” address this possibility and acknowledge that the handling and disposal of these materials would be governed according to a wide range of regulations and requirements with which the City’s contractors would be required to comply. No additional response is necessary.
- (b) No demolition of buildings or structures is proposed as part of the Proposed Project.
- (c) Importation of soil is not anticipated as part of the Proposed Project. Rather, some soil may need to be hauled offsite to a landfill.
- (d) The Proposed Project area has been a developed residential neighborhood for more than 50 years. No investigation of pesticide use is necessary.

**CONCLUSIONS**

The comments received do not affect the IS/MND’s conclusions that the Proposed Project would not have any significant effects on the environment. With the clarifications and minor revision provided above, no additional changes to the IS/MND are necessary, and no recirculation of the IS/MND is required.



# Mitigation Monitoring and Reporting Plan for the State Streets Infrastructure Project

This mitigation monitoring and reporting plan (MMRP) identifies the mitigation measures identified in the City of West Sacramento’s (City’s) State Streets Infrastructure Projects (Proposed Project) Initial Study/ Mitigated Negative Declaration IS/MND) For each mitigation measure, the MMRP identifies monitoring and reporting actions that shall be carried out and the applicable schedule for monitoring activities. This MMRP also includes a column where responsible parties can check off monitoring and reporting actions as they are completed.

As lead agency, the City will be responsible for ensuring that mitigation measures identified in this IS/MND are fully implemented. Some mitigation measures would be implemented by the contractor(s) on behalf of the City. Contract documents for the Proposed Project will identify the obligations of the contractor, including relevant mitigation measures. The City will require that the contractor provide documentation that the contractor has adequately implemented all contractual obligations, including applicable mitigation measures.

Thus, in the descriptions of the mitigation measures provided in below, while the City may be specifically referenced in implementing a mitigation measure (i.e., where the measure states “The City shall”), this is intended to be inclusive of the contractor’s role in implementing certain mitigation measures during construction or as part of design.

## Acronyms and Abbreviations

CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of West Sacramento
CRHR	California Register of Historical Resources
Dbh	diameter at breast height
DSH	diameter at standard height
HCP/NCCP	Yolo Habitat Conservation Plan/Natural Communities Conservation Plan
IS/MND	Initial Study/ Mitigated Negative Declaration
MLD	Most Likely Descendent
MMRP	mitigation monitoring and reporting plan
NAHC	Native American Heritage Commission
Proposed Project	State Streets Infrastructure Projects
USFWS	U.S. Fish and Wildlife Service

## References

Swainson’s Hawk Technical Advisory Committee. 2000. Recommended timing and methodology for Swainson’s Hawk nesting surveys in California’s Central Valley.

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1 **Table D-1. Mitigation Measures and Implementation Requirements**

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<b>Biological Resources</b>			
<p><b>Mitigation Measure BIO-1a. Compliance with the Requirements of the Yolo HCP/NCCP for Swainson’s Hawk and White-Tailed Kite</b></p> <p>The Yolo Habitat Conservation Plan/Natural Communities Conservation Plan (HCP/NCCP) contains avoidance and minimization measures that the City of West Sacramento shall adopt for Swainson’s hawk and white-tailed kite. Specifically, implementation of Avoidance and Minimization Measure 15 in the Yolo HCP/NCCP will:</p> <ul style="list-style-type: none"> <li>▪ Identify and quantify (in acres) Swainson’s hawk and white-tailed kite habitat in and within 1,320 feet of the project footprint, and identify suitable nest trees.</li> <li>▪ Avoid potential nesting trees, with 1,320-foot setbacks from the trees during nesting, to the extent practicable.</li> <li>▪ During construction, if activities would occur within 1,320 feet of nesting habitat between March 15 and August 30, preconstruction activities would be conducted for active nests consistent with the Swainson’s Hawk Technical Advisory Committee (2000). For operation and maintenance, if activities involve pruning or removal of suitable nest trees, preconstruction activities will be conducted for active nests, consistent with the Swainson’s Hawk Technical Advisory Committee (2000).</li> <li>▪ For construction activities occurring from March 15 to August 30, no activities will occur within 1,320 feet of active nests, unless a qualified biologist has determined that the young have fledged and the nest is no longer active or the Yolo Habitat Conservancy, U.S. Fish and Wildlife Service (USFWS), and California Department of Fish and Wildlife (CDFW) agree to a lesser buffer distance. For operations and maintenance, if occupied nest sites are present within 1,320 feet, tree pruning and removal will be deferred until the nest is no longer being used by adults and young.</li> </ul>	<ol style="list-style-type: none"> <li>1. Retain a qualified biologist</li> <li>2. Conduct surveys for Swainson’s Hawk and White-tailed Kite within a minimum 1,32-foot radius around construction areas.</li> <li>3. Establish buffers around active nests.</li> <li>4. Monitor nests to determine when construction activities can begin within the buffer.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. Before construction</li> <li>3. Before construction</li> <li>4. During construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p><b>Mitigation Measure BIO-1b. Conduct Preconstruction Surveys for Nesting Birds and Implement Non-disturbance Buffer Areas.</b></p> <p>To the extent feasible, all vegetation removal shall occur between September 1 and January 31, outside the bird/raptor nesting season, to avoid potential impacts on nesting birds. If construction activities (including staging and tree or vegetation removal) will occur during the nesting season (February 1 through August 31), the City shall retain a qualified wildlife biologist to conduct focused surveys for active bird nests in project areas currently under construction and within a 250-foot buffer no more than 7 days before initiation of construction activities. If no work occurs for a period of 5 days during the nesting season, repeat surveys must be performed before work within 250 feet of suitable nesting substrate is resumed. If the survey indicates that no active nests are present, no further mitigation shall be required.</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified biologist</li> <li>2. Conduct a nesting bird survey within 2 weeks before construction.</li> <li>3. If a lapse of 2 weeks or longer occurs during construction, conduct another focused survey before construction is reinitiated.</li> <li>4. If birds are found, establish an appropriate buffer.</li> <li>5. Monitor nests to determine when construction activities can begin within the buffer.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. Before construction</li> <li>3. During construction</li> <li>4. Before and during construction</li> <li>5. During construction</li> </ol>	
<p><b>Mitigation Measure BIO-2a. Remove and Disturb Trees Outside of the Maternity and Winter Seasons</b></p> <p>To avoid disturbing or eliminating occupied maternity roosts or winter roosts, all tree removal and pruning shall occur outside of the maternity season (May 1 – August 31) and winter season (November 1 – March 1) to the extent feasible.</p>	<ol style="list-style-type: none"> <li>1. Identify occupied roosts by conducting Mitigation Measure 1b, described above.</li> <li>2. Schedule tree removal and pruning in those areas to occur during March 1-April 30 or September 1-October 31.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. During construction</li> </ol>	
<p><b>Mitigation Measure BIO-2b. Conduct a Habitat Assessment and Surveys for Bat Roosts</b></p> <p>Before the commencement of tree removal, a CDFW-approved biologist with experience identifying bat roosts will conduct a daytime habitat suitability assessment to determine if any of the trees in the project area that may be removed, trimmed, or pruned contain potential colonial bat roosting (e.g., large tree cavities, basal hollows, loose or peeling bark, larger snags, palm trees with intact thatch) or indications of bat use (e.g., occupancy, guano, staining, smells, or sounds). Each tree shall be rated on a scale of 1-3: 1 = unsuitable/low suitability; 2 = potentially suitable; and, 3 = identifiable roost. If all trees within the project area are rated 1, no additional measures will be taken. If any trees are rated 2, a CDFW-approved biologist with experience surveying</p>	<ol style="list-style-type: none"> <li>1. Include lighting requirements in construction documents</li> <li>2. Inspect construction sites on a regular basis for compliance</li> </ol>	<ol style="list-style-type: none"> <li>1. During construction</li> <li>2. During construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p>tree roosts shall conduct evening bat surveys at potential sites to assess roosting patterns during the maternity season. Evening emergence surveys will be conducted using night-vision technology and acoustic monitoring from one half hour before sunset to at least 1 hour after sunset for a minimum of two nights. The survey methodology will be submitted and approved by CDFW prior to the survey. If the bat biologist determines that that any of the trees rated 2 are identifiable roosts, their rating will be changed to 3. If any trees are rated 3, the City shall implement Mitigation Measure BIO-2c.</p>			
<p><b>Mitigation Measure BIO-2c. Avoid and Minimize Impacts on Bats and Bat Roosts</b></p> <p>The City shall avoid removal and disturbance of all bat roosts within the project area to the greatest extent feasible. If it is not possible to avoid the disturbance or removal of all roosts, alternative impact minimization measures will be developed according to specific site conditions and degree of impact (e.g., species, size of colony, season of use). These measures may include roost exclusion prior to the sensitive seasons of use, tiered tree pruning or removal under the supervision of a qualified biologist, and compensatory roost replacement. A plan detailing the methods and specifications of the minimization measures will be prepared by a qualified bat biologist and submitted to CDFW for approval prior to implementation, and prior to the start of tree removal or other construction disturbance.</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified biologist</li> <li>2. Conduct surveys for bats during maternity season.</li> <li>3. If bats are using the construction area, develop and implement measures with CDFW approval to minimize impacts on roosts or exclude bats from roost sites.</li> <li>4. Monitor roosts to determine when construction activities can begin within the buffer.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. Before construction</li> <li>3. Before construction</li> <li>4. During construction</li> </ol>	
<p><b>Mitigation Measure BIO-2d. Prepare Bat Roost Compensation Plan and Provide Replacements for Roosts That Cannot Be Avoided</b></p> <p>If bat roosts cannot be avoided or if it is determined that construction activities may cause roost abandonment, the City shall refrain from such activities until roost sites have been replaced.</p> <p>For replacement of roost sites established in the existing trees, the City shall retain a qualified bat biologist to develop a Bat Roost Compensation Plan that addresses the use of the trees, identifies appropriate compensation measures commensurate with the size of the colony, and provides for no net loss in roosting areas for the bats.</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified bat biologist</li> <li>2. Based on the results of bat surveys (Mitigation Measure BIO-2c), identify roost sites that require replacement</li> <li>3. Develop and implement measures with CDFW approval to replace roost sites and appropriate compensation measures.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. Before construction</li> <li>3. Before and during construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p><b>Mitigation Measure BIO-3a: Minimize Potential Impacts on Trees</b></p> <p>Upon receiving and reviewing detailed specifications (site plans) for the Proposed Project’s construction activities, the City shall provide plans to the arborist for review to identify with more certainty the trees that are likely to be affected by construction. During construction, the arborist will work on-site with City staff to identify which trees will need to be removed or trimmed/pruned. Existing trees will be avoided and retained where practicable, using techniques such as the following:</p> <ul style="list-style-type: none"> <li>▪ Design sidewalks to meander around the existing trees.</li> <li>▪ Install water lines above or below tree roots to avoid the need to trim roots.</li> <li>▪ Because vertical placement of sewer lines is not flexible, rehabilitation of sewer lines rather than replacements will be implemented when possible.</li> </ul> <p>The City shall mitigate for trees that are removed by implementing Mitigation Measure BIO-3b.</p>	<ol style="list-style-type: none"> <li>1. Retain an arborist to review site plans and identify those likely to require removal or trimming/pruning.</li> <li>2. Coordinate construction plans with arborist input on avoidance.</li> <li>3. Monitor construction activities in the vicinity of trees that are likely to be affected.</li> </ol>	<ol style="list-style-type: none"> <li>1. During project planning</li> <li>2. During project planning</li> <li>3. During construction</li> </ol>	
<p><b>Mitigation Measure BIO 3b: Implement Mitigation for Removed Trees</b></p> <p>All impacts on trees resulting from trimming, pruning, or removal due to construction activities must be reviewed by a City Tree Administrator if the tree’s diameter at breast height (dbh) is greater than 2 feet for non-native oak and 16 inches for native oak. If the City’s arborist indicates that a tree must be removed, the homeowner will be notified of the decision and may choose to obtain a free replacement tree through the City Parks and Recreation Department’s West Sacramento Tree Program (information is available at <a href="http://www.cityofwestsacramento.org/government/departments/parks-recreation/trees">www.cityofwestsacramento.org/government/departments/parks-recreation/trees</a>). The homeowner may choose from the City’s list of replacement trees: Emerald Sunshine (<i>Ulmus propinqua</i>), Golden Rain (<i>Koelreuteria paniculata</i>), Trident maple (<i>Acer buergerianum</i>), Texas red oak (<i>Quercus buckleyi</i>), Deodar cedar (<i>Cedrus deodara</i>), or Cork Oak (<i>Quercus suber</i>). These trees have been selected because they are drought resistant and utility-friendly (i.e., their height and branching structure are not likely to interfere with</p>	<ol style="list-style-type: none"> <li>1. Contact property owners to coordinate on desired mitigation.</li> <li>2. Provide tree maintenance training through the City’s Free Tree Workshop.</li> <li>3. Coordinate removal and planting of trees to occur during periods identified in MM BIO-2a.</li> </ol>	<ol style="list-style-type: none"> <li>4. During construction</li> <li>5. After construction</li> <li>6. After construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p>power lines, and their root system is not likely to affect underground pipelines or sidewalks).</p> <p>Replacement trees will be planted by the City’s arborist in coordination with the homeowner.</p> <p>Trees will be replaced at a 1:1 ratio (i.e., one replacement tree for each tree removed). Replacement trees will have a 24-inch-box tree to accelerate the processing of achieving the size of the removed tree. If a 24-inch-box tree is not available, 15-gallon trees will be used.</p> <p>Where a street tree must be removed, the replacement tree will not be planted within 5 feet of any fire hydrant and will be placed 4 feet outside of any drainage, sewer, or water easement and sidewalk, as determined by the City Capital Projects &amp; Transportation Department.</p> <p>All removed trees will be chipped and used as mulch in city parks and/or made available to residents at the City’s corporation yard at 1801 West Capitol Avenue.</p>			
<b>Cultural Resources</b>			
<p><b>Mitigation Measure CR-1: Conduct Cultural Resources Awareness Training</b></p> <p>A cultural resources awareness training program will be provided to all construction personnel active on the Project site during earth moving activities. The training will be provided prior to the initiation of ground disturbing activities. The training will be developed and conducted in coordination with a qualified archaeologist meeting the U.S. Secretary of Interior professional standards in archaeology, as defined in 48 Code of Federal Register Parts 44720–44723, and a Native American tribe, who has participated in consultations with the City, will be invited to participate in the training. The program will include relevant information regarding sensitive cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The worker cultural resources awareness program will also describe appropriate avoidance and minimization measures for resources that have the potential to be located on the Project site and will outline what to do and whom to contact if any</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified archaeologist.</li> <li>2. Prepare cultural resources awareness training program.</li> <li>3. Contact and coordinate with Yocha Dehe to participate if desired.</li> <li>4. Schedule and provide worker training prior to initial ground-disturbing activities.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. Before construction</li> <li>3. Before construction</li> <li>4. During construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p>potential archaeological resources or artifacts are encountered. The program will also underscore the requirement for confidentiality and culturally appropriate treatment of any finds of significance to Native Americans, consistent with Native American tribal values.</p> <p>The Yocha Dehe will also be invited to participate in the Project preconstruction meeting, and the tribe will be kept aware of the Project construction schedule.</p>			
<p><b>Mitigation Measure CR-2: Immediately Halt Construction if Cultural Resources Are Discovered, Evaluate All Identified Cultural Resources for Eligibility for Inclusion in the CRHR, and Implement Appropriate Mitigation Measures for Eligible Resources.</b></p> <p>Construction monitoring of ground disturbing activities by archaeological or Native American monitors is not currently planned by the City. However, tribal representatives from a local traditionally and culturally affiliated tribe are invited to visit the construction site at any time to observe construction excavation, as long as the City project manager is notified in advance.</p> <p>If evidence of any subsurface archaeological features or deposits are discovered during construction-related earth-moving activities, such as structural features, bone or shell fragments, flaked or ground stone artifacts, historic-era artifacts, or architectural remains, are encountered during any project construction activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and the City will be contacted. The City will then contact a qualified archaeologist who meet the U.S. Secretary of the Interior’s professional standards and a Native American representative from a traditionally and culturally affiliated tribe, as appropriate (i.e., a Native American site rather than a historic era site), to assess the significance of the find and make recommendations for further evaluation and treatment as necessary.</p> <p>All cultural resources accidentally uncovered during construction within the project site shall be evaluated for eligibility for inclusion in the California Register of Historical Resources (CRHR). Resource evaluations will be conducted by individuals who meet the U.S. Secretary of the</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified archaeologist and coordinate with tribal representatives</li> <li>2. If archaeological features or deposits are discovered, stop work and contact the City.</li> <li>3. Archaeologist and tribal representative will assess the significance of the find and make recommendations for evaluation and treatment.</li> <li>4. Evaluate CRHR eligibility of any discovered resources.</li> <li>5. If eligible resources will be affected, develop and implement additional mitigation.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. During construction</li> <li>3. During construction</li> <li>4. During construction</li> <li>5. During construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p>Interior’s professional standards in archaeology and a Native American representative of a traditionally and culturally affiliated tribe, as appropriate. If any of the resources meet the eligibility criteria identified in Public Resources Code Section 5024.1 or CEQA Section 21083.2(g), mitigation measures will be developed and implemented in accordance with California Environmental Quality Act CEQA Guidelines Section 15126.4(b) before construction resumes.</p> <p>For resources eligible for listing in the CRHR that would be rendered ineligible by the effects of project construction, additional mitigation measures will be implemented. Mitigation measures for archaeological resource, as outlined in CEQA Guidelines Section 15126.4(b), may include (but are not limited to) avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties such as Native American tribes. Native American consultation is required if an archaeological site is determined to be a Tribal Cultural Resource. Implementation of the approved mitigation would be required before resuming any construction activities with potential to affect identified eligible resources at the site.</p>			
<p><b>Mitigation Measure CR-3: Immediately Halt Construction if Human Remains Are Discovered and Implement Applicable Provisions of California Health and Safety Code Section 7050.5.</b></p> <p>If human remains are discovered during the Proposed Project’s construction activities, the requirements of California Health and Safety Code Section 7050.5 shall be followed. Potentially damaging excavation shall halt on the Project site within a minimum radius of 100 feet of the remains, and the County coroner shall be notified, as well as the City’s project manager. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (California Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the Native American Heritage Commission (NAHC) by phone within 24 hours of making that</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified archaeologist</li> <li>2. In the event that human remains are encountered, halt work and contact the County Coroner.</li> <li>3. If discovered remains are those of a Native American, he or she must contact the NAHC by phone within 24 hours of making that determination.</li> <li>4. NAHC shall identify a MLD, upon which this person shall be notified and given at least 48 hours to inspect the site and</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. During preparation of plans and specifications</li> <li>3. During construction</li> <li>4. During construction</li> <li>5. During construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p>determination (California Health and Safety Code Section 7050[c]). Pursuant to the provisions of Pub. Res. Code Section 5097.98, NAHC shall identify a Most Likely Descendent (MLD). The MLD designated by NAHC shall have at least 48 hours to inspect the site and propose treatment and disposition of the remains and any associated grave goods. The State shall work with the MLD to ensure that the remains are removed to a protected location and treated with dignity and respect. Native American human remains may also be determined to be tribal cultural resources. The Yolo County coroner will determine the treatment of human remains that are not of Native American origin. Such treatment may include archaeological excavation.</p>	<p>propose treatment and disposition of the remains and any associated grave goods.</p> <p>5. Cooperation with MLD is required.</p>		
<p><b><i>Geology, Soils, and Seismicity</i></b></p>			
<p><b>Mitigation Measure GEO-1. Conduct Construction Monitoring During Clearing and Grading to Provide Supplemental Recommendations if Necessary</b></p> <p>Construction monitoring is a continuation of the findings and recommendations provided in the Geotechnical Report. The City shall involve the project engineer in all grading activities to provide supplemental recommendations as field conditions dictate. The project engineer will be notified at least 2 working days before site clearing or grading operations commence, and will observe the overexcavation of existing fills or loose/soft soils and provide consultation to the grading contractor in the field.</p>	<ol style="list-style-type: none"> <li>1. Retain a project engineer.</li> <li>2. Inform the project engineer 2 working days before site clearing and grading operations.</li> <li>3. Consult with project engineer regarding treatment measures for existing fills and loose/soft soils.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> <li>2. Before and during construction</li> <li>3. During construction</li> </ol>	
<p><b>Mitigation Measure GEO-2. Halt Excavation If Paleontological Resources Are Encountered, Evaluate the Find, and Implement Measures to Avoid Impacts</b></p> <p>If paleontological resources are encountered during Project excavation and no monitor is present, all ground-disturbing activities within 50 feet of the find shall be redirected to other areas until a qualified paleontologist can be retained to evaluate the find and make recommendations for additional paleontological mitigation, which may include paleontological monitoring; collection of observed resources; preservation, stabilization, and identification of collected resources; curation of resources into a museum repository; and preparation of a</p>	<ol style="list-style-type: none"> <li>1. Retain a qualified paleontologist if paleontological resources are discovered.</li> <li>2. Stop work and contact the City.</li> <li>3. The paleontologist will evaluate the find and make recommendations for additional mitigation.</li> </ol>	<ol style="list-style-type: none"> <li>4. During construction</li> <li>5. During construction</li> <li>6. During construction</li> </ol>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
final report documenting the monitoring methods and results to be submitted to the museum repository and the City of West Sacramento.			
<b>Noise</b>			
<p><b>Mitigation Measure NOI-1. Equip Construction Equipment with Mufflers.</b></p> <p>Prior to any construction activity, the construction contractor (confirmed by the City), shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers, consistent with manufacturers’ standards.</p>	<p>1. City to confirm that contractor has appropriate equipment.</p>	<p>1. Before construction</p>	
<p><b>Mitigation Measure NOI-2. Locate Staging Areas Away from Residences.</b></p> <p>Prior to and during any construction activity, the construction contractor (confirmed by the City or a City-appointed noise liaison) shall locate equipment staging in areas that would create the greatest possible distance between construction-related noise sources and residences.</p>	<p>1. City to confirm construction staging areas.</p>	<p>1. Before construction</p>	
<p><b>Mitigation Measure NOI-3. Limit Construction Hours.</b></p> <p>The construction contractor, through enforcement by the City, shall ensure that all general construction-related activities be restricted to the daytime hours of 7:00 a.m. to 7:00 p.m., Monday through Friday. Construction activities shall be restricted from occurring on weekends (Saturday and Sunday) and on holidays.</p>	<p>1. City to confirm that construction is taking place within identified hours.</p>	<p>1. During construction.</p>	
<p><b>Mitigation Measure NOI-4. Appoint a Construction Noise Liaison, Enforce Noise Requirements, and Respond to Noise Complaints.</b></p> <p>The City shall appoint a construction noise liaison who shall be responsible for responding to any local complaints about construction noise. The City shall facilitate a focus meeting with project area residents, the construction contractor, and the noise liaison to notify residents of potential impacts and measures to reduce such impacts.</p> <p>If a noise complaint related to construction is received, the construction noise liaison shall determine the cause of the construction noise issue (e.g., construction activities outside of City authorized times, bad</p>	<p>1. Appoint a City construction noise liaison.</p> <p>2. Schedule and hold focus meeting with residents.</p> <p>3. Respond to noise complaints.</p>	<p>1. Before construction</p> <p>2. Before construction</p> <p>3. During construction</p>	

Mitigation Measure	Monitoring and Reporting Action	Monitoring Schedule	Completion Date and Initials
<p>muffler) and shall enforce existing City noise requirements with the construction contractor. If the noise complaint cannot be resolved through enforcement, Mitigation Measure NOI-5 shall be implemented.</p>			
<p><b>Mitigation Measure NOI-5. Notify Residents Before Active Construction Begins and Provide Lodging Accommodations by Request.</b>                      At least 2 weeks (14 days) prior to commencement of construction activities within 500 feet (two blocks) of residences, the City (in coordination with the construction contractor and construction noise liaison) shall provide written notification to those residences of construction activities, the intended length of occurrence, the potential occurrence for short-term noise level increases, and noise liaison contact information. The written notification may be distributed to residences in person or by mail.</p>	<ol style="list-style-type: none"> <li>1. Inform residents of alternative lodging option.</li> <li>2. Coordinate with interested residents.</li> </ol>	<ol style="list-style-type: none"> <li>1. During construction</li> <li>2. During construction</li> </ol>	
<b>Transportation</b>			
<p><b>Mitigation Measure TR-1. Park and Stage Construction Equipment in Off-street Areas Where Possible.</b>                      Before construction begins, the City shall identify parking lots or other off-street locations within or near the project roadways where construction worker vehicles and construction equipment can be parked without interfering with the safety and visibility of streets in the project area. Such areas may include parking lots of commercial establishments, churches, and other facilities. The City will identify appropriate areas for construction worker vehicles that are near to work zones, as well as staging areas that can be appropriately secured. These areas will be indicated on project plans and specifications.</p>	<ol style="list-style-type: none"> <li>1. City to confirm contractor staging and parking areas.</li> </ol>	<ol style="list-style-type: none"> <li>1. Before construction</li> </ol>	

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