Appendix A. Mitigation Monitoring and Reporting Program

MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) has been developed for the Western Placer Waste Management Authority's (WPWMA) Renewable Placer: Waste Action Plan Project, consistent with the requirements of California Code of Regulations (CCR), Title 14, Division 6, Chapter 3, Article 7, Section 15097. The intent of the MMRP is to prescribe and enforce a means for properly and successfully implementing the mitigation measures identified within the Environmental Impact Report for this project. The MMRP will apply to Plan Concept 1, Plan Concept 2, or other similarly configured project.

Unless otherwise noted, the WPWMA and subsequent parties in interest will be responsible for implementing, complying with, and paying for all mitigation measures identified herein.

In compliance with the California Environmental Quality Act (CEQA) Guidelines, 14 CCR 15097(a), when significant effects are identified in an EIR, the Lead Agency is required to adopt a program for reporting or monitoring mitigation measures that were adopted or made conditions of approval for the proposed project.

MITIGATION MONITORING PLAN

Table A-1 on the following pages includes the mitigation measure number, the mitigation measure text, the actions required, entity responsible for monitoring and compliance, timing of the initial action, and frequency and duration of monitoring.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Chapter 5, Aesthetics				
Mitigation Measure 5-3: Impacts from Offsite Litter Generation. Although an extensive offsite litter control program is in place at the facility and would continue in the future with implementation of the proposed project, the impact of increased litter through the extended life of the WRSL would be considered significant and unavoidable. Therefore, WPWMA would implement a tarping policy that requires incoming loads to use tarps, thus minimizing the potential for offsite litter generation. However, even with implementation of a tarping policy, this impact would remain significant.	▪ Notify haulers of the tarping policy. ▪ Determine enforcement mechanism for tarping policy. ▪ Implement tarping policy.	WPWMA	Prior to initiation of the proposed project.	Frequency: Daily as loads are received. Duration: Active life of the landfill.
Chapter 6, Air Quality				
Mitigation Measure 6-1: Consistency with Applicable Air Quality Plans. Through the air permitting process and implementation of BMPs and project design measures in Table 6-1, the WPWMA shall work with the PCAPCD to provide information on the construction and operation of the solid waste elements, complementary and programmatic elements, and supporting elements under the proposed project. The emissions estimates prepared to support this CEQA air quality impact analysis are based on many conservative assumptions (as described in the sections to follow and in Appendix C.2) to allow flexibility as the project elements move forward through planning, design, funding, and implementation. The methodology for this air quality and environmental assessment is consistent with the CEQA Handbook that PCAPCD prepared for evaluation and mitigation of projects in Placer County (PCAPCD 2017a). Current results and conclusions are based on criteria used by PCAPCD to evaluate potential air quality impacts, using PCAPCD-recommended emissions calculation methods, significance thresholds, and mitigation strategies. All projects in Placer County are subject to PCAPCD's adopted rules and regulations. Specific local air quality rules applicable to implementation of the proposed project have been evaluated for applicability to the project elements, and results show that the proposed project elements (solid waste elements, complementary and programmatic elements, and supporting elements) would comply with applicable regulatory and permitting requirements.	▪ Compile construction and operation information for the solid waste elements, complementary and programmatic elements, and supporting elements of the proposed project, as needed to show that the proposed project elements would comply with applicable regulatory and permitting requirements. ▪ Provide compiled information to PCAPCD as required.	WPWMA PCAPCD	During construction and ongoing.	Frequency: As required/dependent on applicable regulations and conditions in contracts, permits, and plans. Duration: Ongoing through construction and operation of the proposed project.
Mitigation Measure 6-2(a): Construction emissions of criteria air pollutants (PM_{10} and $PM_{2.5}$) and ozone precursors. Construction contractor(s) shall document their capability and commitment to implement PCAPCD's recommended construction mitigation measures and the project design measures identified in Table 6-1 as part of their grading and improvement plan submittals. Prior to any construction activity, the contractor(s) shall submit a Construction Emission and Dust Control Plan to PCAPCD a minimum of 21 days before construction activity is scheduled to commence. To further mitigate the significant air quality impact identified for construction PM_{10} emissions, the following additional mitigation measures, expanding on those identified in Table 6-1 as BMPs and project design measures,[1] shall be implemented to address exhaust PM_{10} and $PM_{2.5}$ emissions and provide dust control.	▪ Revise RFP language and construction contracts to include requirements for contractors to: (1) document capabilities and commitments to implement the recommended construction mitigation measures, BMPs, and project design measures as part of grading and improvement plan submittals, and (2) prepare and submit Construction Emission and Dust Control Plan to PCAPCD on the schedule required. ▪ Ensure contractor implements mitigation measures, BMPs, project design measures, and the approved dust control plan.	WPWMA PCAPCD	Contractor to submit a Construction Emission and Dust Control Plan to PCAPCD 21 days prior to commencement of any construction activity. Implement mitigation measures, BMPs, and project design measures on an ongoing basis.	Frequency: As required/dependent on applicable regulations and conditions in contracts, permits, and plans. Duration: Ongoing through construction and operation of the proposed project.
Mitigation Measure 6-2(b): Project contractor(s) shall implement BMPs prior to or during all construction activities, including onsite construction-related grading. The WPWMA shall require all construction contracts and plans to include the applicable construction BMPs and project design measures from Table 6-1, as well as the following: ▪ Designation of a person or persons to monitor fugitive dust emissions and enhance implementation of the Dust Control Plan to minimize dust complaints, reduce visible emissions to below 20 percent opacity, and prevent transport of dust offsite. The designated monitoring	▪ Revise RFP language and construction contracts to require implementation of mitigation measures, BMPs, project design measures, and dust control plans. Designated monitoring personnel must be certified in VEE or equivalent.	WPWMA PCAPCD	Contractor to submit a Construction Emission and Dust Control Plan 21 days prior to commencement of any construction activity.	Frequency: As required/dependent on applicable regulations and conditions in contracts, permits, and plans.

[1] Note: Applicable measures from PCAPCD's recommended construction mitigation measures (PCAPCD 2017a) are incorporated in the proposed project as project design measures. For the list of BMPs and project design measures incorporated in the proposed project, please see the list of measures in Table 6-1.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
personnel shall obtain the certificate of Visible Emissions Evaluation (VEE) from the California Air Resources Board (CARB) field training program, or equivalent. Duties shall include holidays and weekend periods when work may not be in progress. ▪ Post signage at property boundaries with name(s) and contact information for designated person(s) for reporting of dust complaints. ▪ All roadways, driveways, sidewalks, parking lots intended for pavement as part of an applicable construction project shall be paved as soon as possible. In addition, building pads shall be laid immediately after grading unless seeding or soil binders are used. ▪ The PCAPCD shall be contacted regarding permitting requirements if any portable equipment is to be used for construction of the project elements.	▪ Post and maintain required signage, pave areas to limit dust, and inform PCAPCD if portable equipment is to be used. ▪ Ensure contractor implements mitigation measures, BMPs, project design measures, and the approved dust control plan.		Implement mitigation measures, BMPs, and project design measures on an ongoing basis during construction.	Duration: Ongoing through construction.
Mitigation Measure 6-2(c): The WPWMA shall implement a recordkeeping program to oversee and enforce compliance with the BMP requirement for diesel-fueled equipment to use engines that meet Tier 4 Final emission standards, as certified by CARB, or cleaner, prior to or during onsite grading and construction activities. This mitigation measure is intended for WPWMA oversight to ensure that all diesel-fueled construction equipment shall have engines that meet the Tier 4 Final emission standards, as certified by CARB, or cleaner, if feasible (City of Sacramento 2021). This requirement shall be verified through contractor submittal of an equipment inventory to the WPWMA for each construction project that includes the following information: A. Type of Equipment B. Engine Year and Age C. Number of Years Since Rebuild of Engine (if applicable) D. Type of Fuel Used E. Engine Horsepower F. Verified Diesel Emission Control Strategy (VDECS) information, if applicable, and other related equipment data If any new equipment is added after submission of the inventory, the contractor(s) shall contact the WPWMA regarding the new equipment being used. The project contractor(s) must also provide a signed Certification Statement for documentation of compliance and for future review by the WPWMA as needed. The Certification Statement shall state that the contractor agrees to compliance and acknowledges that a violation of this requirement shall constitute a material breach of contract. The WPWMA may waive the equipment requirement above only under the following unusual circumstances: ▪ A particular piece of off-road equipment with Tier 4 Final standards is technically not feasible or not commercially available. ▪ The equipment would not produce desired emissions reduction due to expected operating modes. ▪ Installation of the equipment would create a safety hazard or impair visibility for the operator. ▪ There is a compelling emergency need to use other alternate off-road equipment. If the WPWMA grants the waiver, the contractor shall use the next cleanest piece of off-road equipment available, as detailed in Table 6-9. If seeking a waiver from this requirement it must be demonstrated, to the satisfaction of the WPWMA, that the emissions do not exceed significance thresholds. If the project implements the "step down" approach, using construction equipment with less than Tier 4 emissions standards and the resulting emissions exceed the PCAPCD threshold, a mitigation fee (per ton of emissions) shall be assessed to achieve the remaining mitigation. Table 6-9 describes the Off-Road Equipment Compliance Step Down approach: ▪ If engines that comply with Tier 4 Final off-road emission standards are not commercially available, then the contractor shall meet Compliance Alternative 1.	▪ Revise RFP language and construction contracts to require implementation of mitigation measures, BMPs, project design measures, and dust control plans. Contract language shall include requirements for contractors to submit an equipment inventory to WPWMA for each project, along with a signed Certification Statement with commitment to compliance. Contractor shall maintain records concerning relevant efforts to comply with this requirement and provide them to WPWMA on a weekly basis during active construction periods. WPWMA to review and verify that contractor submissions meet Mitigation Measure requirements.	WPWMA PCAPCD	Construction equipment list will be verified by WPWMA during the contractor submittal phases for the proposed project's construction activities.	Frequency: As required, dependent on applicable regulations and conditions in contracts, permits, and plans. Changes to equipment inventory required when equipment additions or subtractions occur. Duration: During construction.

Table A-1. Mitigation Monitoring and Reporting Program

<table>
<tr><th>Mitigation Measure</th><th>Action Required</th><th>Entity Responsible for Monitoring and Verifying Compliance</th><th>Timing of Initial Action</th><th>Frequency and Duration of Monitoring</th></tr>
<tr><td>
▪ If off-road equipment meeting Compliance Alternative 1 is not commercially available, then the project sponsor shall meet Compliance Alternative 2.
▪ If off-road equipment meeting Compliance Alternative 2 is not commercially available, then the project sponsor shall meet Compliance Alternative 3.

Table 6-9. Off-Road Equipment Compliance Step Down Approach
<table>
<tr><td>Compliance Alternative</td><td>Engine Emissions Standard</td><td>Emissions Control</td></tr>
<tr><td>1</td><td>Tier 4 Interim</td><td>Tier 4 Interim</td></tr>
<tr><td>2</td><td>Tier 3</td><td>CARB Level 3 VDECS</td></tr>
<tr><td>3</td><td>Tier 2 with retrofit</td><td>CARB Level 3 VDECS</td></tr>
</table>
For purposes of this mitigation measure, “commercially available” shall mean the availability of Tier 4 Final engines similar to the availability for other large-scale construction projects in the region occurring at the same time and taking into consideration factors such as (1) potential significant delays to critical-path timing of construction for the project and (2) geographic proximity to the project site of Tier 4 Final equipment.

The project contractor(s) shall maintain records concerning relevant efforts to comply with this requirement and provide them to WPWMA on a weekly basis during active construction periods.
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Mitigation Measure 6-3: Operational emissions of criteria air pollutants and ozone precursors.

The WPWMA and its operation contractor(s) shall document their capability and commitment to implement the operational emission reduction BMPs and project design measures identified in Table 6-1 as part of their contracts and plan submittals. To further mitigate the significant air quality impacts identified for operational emissions of NOx and PM_{10}, the following additional mitigation measures, which expand on those identified in Table 6-1 as BMPs and project design measures,[2] shall be implemented.
</td><td>▪ Revise RFP language, operational contracts, and site plans to require implementation of operational mitigation measures, BMPs, and project design measures.</td><td>WPWMA
PCAPCD</td><td>Mitigation measures, BMPs, and project design measures implemented on an ongoing basis for project operations.</td><td>Frequency: As required, dependent on applicable regulations and conditions in contracts, permits, and plans.

Duration: Ongoing through operation.</td></tr>
<tr><td>
Mitigation Measure 6-3(a): Fund NOx emissions reductions through an Offsite Mitigation Fee Program.

The operation of solid waste elements, complementary elements, and supporting elements under the proposed project would result in net emissions increases in operational emissions that would exceed PCAPCD’s recommended operational significance thresholds of 55 lb/day for NOx, even with implementation of the BMPs and project design measures listed in Table 6-1. The estimated total increase in NOx emissions estimated in excess of the significance threshold for this project under Plan Concept 1 is approximately 102.5 lb/day, equivalent to 9.4 tons
</td><td>▪ WPWMA to coordinate with PCAPCD to determine which NOx emission reductions program(s) would be most feasible and cost-effective and participate as required.</td><td>WPWMA
PCAPCD</td><td>WPWMA to coordinate with PCAPCD to determine when the operation will exceed PCAPCD’s recommended operational significance thresholds of 55 lb/day for NOx.</td><td>Frequency: One-time funding and establishment or participation in an offsite mitigation program/project.

Duration: One-time.</td></tr>
</table>

[2] Note: Applicable measures from PCAPCD’s recommended operational emission mitigation measures (PCAPCD 2017a) are incorporated in the proposed project as project design measures. For the list of BMPs and project design measures incorporated in the proposed project, please see the list of measures in Table 6-1.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
per ozone season,[3] and under Plan Concept 2 is approximately 97.2 lb/day, equivalent to 8.9 tons per ozone season. To mitigate the net project-related increases in operational NOx emissions, the WPWMA shall participate in one of the following voluntary offsite mitigation programs: ▪ Establish and fund an offsite mitigation project to result in a NOx emission reduction equivalent to the total amount of emissions estimated to exceed the PCAPCD significance threshold over a single season. Developing an offsite mitigation program in western Placer County shall be coordinated with PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD. Examples of NOx emission reduction mitigation projects include, retrofitting, repowering, or replacing heavy-duty engines from mobile sources (for example, buses, construction equipment, on-road haulers), provision of electrical charging stations to support vehicle electrification, or other programs to reduce regional NOx emissions. ▪ Participate in the District's Offsite Mitigation Fee Program by paying the equivalent amount of money to mitigate the net project contribution of NOx that exceeds the 55 lb/day threshold over a single season. As indicated previously, the estimated NOx emissions offset requirement is approximately 9.4 tons/year for Plan Concept 1 and 8.9 tons/year for Plan Concept 2. The estimated mitigation fees for the NOx emissions increase associated with project operations is approximately $177,000 for Plan Concept 1 and $167,000 for Plan Concept 2, based upon PCAPCD's adopted cost-effectiveness rate of $18,790 per ton for ozone precursors like NOx and the current California CPI rate (PCAPCD 2017b, 2021b). The actual amount to be paid shall be determined based on the selected program and applicable cost-effectiveness rate agreed to by the WPWMA and PCAPCD and shall be paid by the WPWMA or other responsible parties. ▪ Any combination of the above or other measures, as determined feasible by WPWMA and PCAPCD.				
Mitigation Measure 6-3(b): Fund PM_{10} emissions reductions through an Off-Site Mitigation Fee Program. The operation of solid waste elements, complementary elements, and supporting elements under the proposed project would result in net emissions increases in operational emissions that would exceed PCAPCD's recommended operational significance thresholds of 82 lb/day for PM_{10}, even with implementation of the BMPs and project design measures listed in Table 6-1. The estimated total increase in PM_{10} emissions estimated in excess of the significance threshold for this project under Plan Concept 1 is approximately 403.0 lb/day, equivalent to 36.5 tons per winter season, and for Plan Concept 2 is approximately 263.7 lb/day, equivalent to 23.9 tons per winter season. To mitigate the net project-related increases in operational PM_{10} emissions, the WPWMA shall participate in one of the following voluntary offsite mitigation programs: ▪ Establish and fund an offsite mitigation project to result in a PM_{10} emission reduction equivalent to the total amount of emissions estimated to exceed the PCAPCD significance threshold over a single season. Developing an offsite mitigation program in western Placer County shall be coordinated with PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD. Examples of PM_{10} emission reduction mitigation projects include, among other, retrofitting, repowering, or replacing heavy-duty engines from mobile sources (for example, buses, construction equipment, on-road haulers), replacing woodstoves, road paving, or other programs to reduce PM_{10} emissions. ▪ Participate in the District's Offsite Mitigation Fee Program by paying the equivalent amount of money, to mitigate the net project contribution of PM_{10} that exceeds the 82 lb/day threshold over a single season. As indicated previously, the estimated PM_{10} emissions offset requirement is approximately 36.5 tons/year for Plan Concept 1 and 23.9 tons/year for Plan Concept 2. The estimated mitigation fees for the PM_{10} emissions increase associated with project operations is approximately $220,800 for Plan Concept 1 and $144,600 for Plan Concept 2, based upon an assumed cost-effectiveness rate of $6,050 per ton used for PM_{10} in the SAP DEIR (Placer County 2018). The actual amount to be paid shall be determined based on the selected program and applicable cost-effectiveness rate agreed to by the WPWMA and PCAPCD and shall be paid by the WPWMA or other responsible parties. ▪ Any combination of the above or other measures, as determined feasible by the WPWMA and PCAPCD.	▪ WPWMA to coordinate with PCAPCD to determine which PM10 emission reductions program(s) would be most feasible and cost-effective and participate as required.	WPWMA PCAPCD	WPWMA to coordinate with PCAPCD to determine when the operation will exceed PCAPCD's recommended operational significance thresholds of 82 lb/day for PM_{10}.	Frequency: One-time funding and establishment or participation in an offsite mitigation program/project. Duration: One-time
Mitigation Measure 6-6: Implement odor reduction measures	Revise RFP language, operational contracts, and site plans to require implementation of operational mitigation measures, BMPs, and project design measures, including	WPWMA PCAPCD	Prior to project implementation; mitigation measures,	Frequency: As specified for each measure.

[3] The summer season is estimated at 184 days per year and applies to estimation of mitigation requirements for ozone precursors like NOx; the winter season is estimated at 181 days and applies for PM_{10} (PCAPCD 2017a).

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
The following odor reduction measures shall be implemented in addition to the BMPs and project design measures listed in Table 6-1 as mitigation measures for the proposed project: ▪ Compile and Evaluate Weekly Odor Emissions Monitoring (Tier 1, Composting Operations). Weekly odor emissions monitoring from various points on and offsite, conducted pursuant to the SWOP, will be compiled annually to evaluate odor emission trends and the strength and character of odors generated at different phases and sources in the composting process. Response actions will be implemented as indicated in site operational documents such as the SWOP and OIMP. ▪ Increase Screening of LFG and Implement Response Actions (Tier 1, Landfill Operations). Quarterly screening for fugitive LFG shall be conducted to identify "hot spots" of LFG emissions through interim and final landfill covers. Such screening reduces the time between identification and repair of surface hot spot emissions, and thus odor. A "hot spot" is defined as any area where surface methane standards established by the CARB are exceeded for at least two quarters in any consecutive four quarter period. CARB requires that, "any area where solid waste has been buried; the landfill methane surface concentration must not exceed the 500 parts per million by volume (ppmv) instantaneous or 25 ppmv (averaged) integrated surface methane emission standards, excluding the working face." (CARB 2022) For instances where the integrated surface methane emission standard of 25 ppmv (averaged) of a monitoring grid is exceeded, the grid area will be monitored again at 15-foot centers (instead of the routine 25-foot centers) to further identify the area(s) of highest emissions. The noted areas of exceedance will be monitored again and corrective actions from the site operations and maintenance manual will be implemented as necessary to reduce emissions below the allowable level. For instances where the instantaneous surface methane emission standard of 500 ppmv is exceeded, the area will be monitored weekly for up to 3 weeks or until emissions are reduced enough to no longer constitute an exceedance. Corrective actions from the site operations and maintenance manual will be implemented as necessary to reduce emissions below the allowable level. ▪ Enhance LFG Collection (Tier 1, Landfill Operations). To reduce landfill-related odor emissions, the WPWMA shall establish stricter protocols for LFG collection. Because LFG must be used, flared, or stored in a leak-free container, minimizing odorous emissions involves operating the system for maximum containment of gas as well as cost-effective performance of the gas-to-energy system. ▪ Implement Enhanced Monitoring and Modeling (Tier 1, Site-wide Technologies and Operations). To monitor odor emissions in areas around the WRSL, odor sensors shall be placed in developed areas surrounding the landfill to identify odor spikes or other abnormal odor emissions, ideally before community complaints are lodged. Updates to the WPWMA's dispersion modeling capabilities shall also be implemented to better predict the nature, location, and intensity of odor issues. ▪ Establish Tree-lined Perimeter of WRSL (Tier 1, Site-wide Technologies and Operations). Trees with aromatic foliage, such as pine or eucalyptus, shall be planted and maintained around the WRSL to visually screen the landfill from surrounding areas, providing psychological benefits, and to serve as a windbreak, thereby impeding, absorbing, or otherwise altering the flow of odorous emissions from the facility. ▪ Implement additional measures in accordance with the Odor Mitigation MOU (Churchwell White, LLP 2019; Schmidt and Card 2019).	capability and commitment to implement the odor control measures identified, including: ▪ Compost odor emission monitoring and evaluation. ▪ Determination of feasible actions to reduce the time between identification and repair of surface hot spot emissions. ▪ Determination of feasible improvements resulting in stricter protocols for LFG collection. ▪ Determination of feasible locations for odors sensors. ▪ Determination of appropriate tree species. ▪ Planting of trees at appropriate intervals to create the desired visual screen.		BMPs, and project design measures will be implemented on an ongoing basis for project operations.	Duration: Ongoing during construction and operation of the proposed project.
Chapter 7, Biological Resources				
Mitigation Measure 7-1: Impacts on Special-Status Plant Species. The WPWMA shall implement the proposed project as a Covered Activity under the PCCP and CARP to compensate for any loss of special-status plants. In the absence of avoidance, minimization, and mitigation measures established by the PCCP for rare plants, WPWMA will implement the Placer County Sunset Area Plan (SAP) Policy NR-2.1: Special-Status Plant Species Protection, and SAP Program NR-5: Special-Status Plant Species Protection Guidelines, to mitigate for the loss of special-status plant species. The WPWMA will retain qualified botanists to conduct protocol-level botanical surveys. The Guidelines, at a minimum, will require the following: ▪ All plant species encountered on the project site will be identified to the taxonomic level necessary to determine species status. ▪ The surveys will be conducted no more than 5 years prior and no later than the blooming period immediately preceding the approval of a grading or improvement plan or any ground-disturbing activities, including grubbing or clearing. ▪ If special-status plants are identified on the project site, the project applicants will be required to implement the following measures to mitigate the potential loss of special-status plant species:	▪ Avoid and minimize impacts to special-status plants. ▪ Quantify unavoidable impacts. ▪ Obtain take coverage from PCCP in accordance with the Participating Special Entity's Implementing Agreement or by implementing the Placer County SAP Policy NR-2.1: Special-Status Plant Species Protection, and SAP Program NR-5: Special-Status Plant Species Protection Guidelines ▪ Pay applicable mitigation fees.	Placer Conservation Authority WPWMA	Prior to, typically within 5 years of, conducting activities that may impact special-status plants.	Frequency: Satisfied prior to construction commencing. Annual mitigation monitoring required by SAP Policy NR-2.1, if applicable. Duration: Mitigations will be monitored in perpetuity. Mitigation monitoring responsibility is transferred to PCA upon fee payment by the WPWMA.

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Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring

• Avoid special-status plant occurrences through project design to the extent technically feasible and appropriate. Avoidance will be deemed technically feasible and appropriate if the habitat occupied by special-status plants may be preserved onsite while still obtaining the project purpose and objectives and if the preserved habitat features could reasonably be expected to continue to function as suitable habitat for special-status plants following project implementation.
 	
• If, after examining all feasible means to avoid impacts to potential special-status plant species habitat through project site planning and design, adverse effects cannot be avoided, then impacts will be mitigated in accordance with guidance from the appropriate state or federal agency charged with the protection of the subject species.
 	
• Notify CDFW, as required by the California Native Plant Protection Act, if any special-status plants are found on the project site. Notify the USFWS if any plant species listed under the Endangered Species Act are found.
 	
• Develop a mitigation and monitoring plan (MMP) to compensate for the loss of special-status plant species found during preconstruction surveys, if any. The MMP will be submitted to CDFW and/or USFWS, as appropriate depending on species status, for review and comment. WPWMA will consult with these entities, as appropriate, depending on species status. Mitigation measures may include preserving and enhancing existing onsite populations, creation of offsite populations on project mitigation sites through seed collection or transplantation and preserving occupied habitat offsite in sufficient quantities to offset loss of occupied habitat or individuals.
 	
• If transplantation is part of the mitigation plan, the plan will include a description and map of mitigation sites, details on the methods to be used, including collection, storage, propagation, receptor site preparation, installation, long-term protection and management, monitoring and reporting requirements, remedial action responsibilities should the initial effort fail to meet long-term monitoring requirements, and sources of funding to purchase, manage, and preserve the sites. The following performance standards will be applied:
 	
  ○ The extent of occupied area and the flower density in compensatory re-established populations will be equal to or greater than the affected occupied habitat and will be self-producing. Re-established populations will be considered self-producing when:
 	
  ▪ Plants re-establish annually for a minimum of 5 years with no human intervention, such as supplemental seeding.
 	
  ▪ Re-established habitats contain an occupied area and flower density comparable to existing occupied habitat areas in similar habitat types.
 	
▪ If offsite mitigation includes dedication of conservation easements, purchase of mitigation credits, or other offsite conservation measures, the details of these measures will be included in the mitigation plan, including information on responsible parties for long-term management, conservation easement holders, long-term management requirements, and other details, as appropriate to target the preservation of long-term viable populations.				

Mitigation Measure 7-2: Impacts on Vernal Pool Branchiopods and Western Spadefoot. The WPWMA shall implement the proposed project as a Covered Activity under the PCCP and CARP to compensate for loss of vernal pool fairy shrimp and vernal pool tadpole shrimp habitat. Although western spadefoot is not covered under the PCCP, implementation of the PCCP would reduce impacts on western spadefoot because the species requires the protection of vernal pool complex habitat for survival, and this habitat would be protected for vernal pool fairy shrimp and vernal pool tadpole shrimp. The protection of vernal pool complex habitat, and vernal pool branchiopods and western spadefoot by proxy, would be supported by the following conditions from the PCCP (Placer County 2020c) (Appendix D): ▪ General Condition 1, Watershed Hydrology and Water Quality ▪ General Condition 3, Land Conversion	▪ Avoid and minimize impacts vernal pool branchiopods and western spadefoot. ▪ Quantify unavoidable impacts. ▪ Obtain take coverage from PCCP/CARP in accordance with the Participating Special Entity's Implementing Agreement. ▪ Pay applicable mitigation fees.	Placer Conservation Authority WPWMA	Prior to conducting activities that may impact vernal pool branchiopods and western spadefoot.	Frequency: Satisfied prior to construction commencing. Duration: Mitigation monitoring responsibility is transferred to PCA upon

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Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
▪ General Condition 4, Temporary Effects ▪ General Condition 5, Conduct Worker Training ▪ Regional Public Projects Condition 3, Operations and Maintenance best management practices (BMPs) ▪ Species Condition 10, Vernal Pool Fairy Shrimp and Vernal Pool Tadpole Shrimp Covered Activities shall be assessed fees based on the parameters described in Chapter 9, Costs and Funding, and as summarized in Tables 9-6 and 9-7 of the PCCP HCP/NCCP (Placer County 2020a). Special habitat fees (Table 9-7 of the PCCP HCP/NCCP) are variable depending on the special habitat type and would be paid in addition to land conversion fees. In the Central Valley, the fees shall be applied when projects affect natural, semi-natural, and other agricultural communities.				fee payment by the WPWMA.
Mitigation Measure 7-3: Impacts to Valley Elderberry Longhorn Beetle. Valley elderberry longhorn beetle is a Covered Species under the PCCP. Potential impacts on this species shall be mitigated by implementing the PCCP conservation strategy. The PCCP conservation strategy includes survey and impact minimization and avoidance requirements for Covered Species, other conditions on Covered Activities to achieve conservation goals and objectives for Covered Species and natural communities, establishment of a habitat reserve system, and long-term conservation and management of habitats in the reserve system. The protection and restoration of valley elderberry longhorn beetle habitat within the proposed project area would be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D): ▪ General Condition 4, Temporary Effects ▪ General Condition 5, Conduct Worker Training ▪ Regional Public Projects Condition 3, Operations and Maintenance BMPs ▪ Species Condition 8, Valley Elderberry Longhorn Beetle	▪ Avoid and minimize impacts to Valley elderberry longhorn beetle. ▪ Quantify unavoidable impacts. ▪ Obtain take coverage from PCCP in accordance with the Participating Special Entity's Implementing Agreement. ▪ Pay applicable mitigation fees.	Placer Conservation Authority WPWMA	Prior to conducting activities that may impact Valley elderberry longhorn beetle.	Frequency: Satisfied prior to construction commencing. Duration: Mitigation monitoring responsibility is transferred to PCA upon fee payment by the WPWMA.
Mitigation Measure 7-4: Impacts on Special-Status Bird Species, Including Raptors. Burrowing owl, Swainson's hawk, and tricolored blackbird are Covered Species under the PCCP. Potential impacts on these species shall be mitigated through implementation of the PCCP conservation strategy. The PCCP conservation strategy includes survey and impact minimization and avoidance requirements for Covered Species, other conditions on Covered Activities to achieve conservation goals and objectives for Covered Species and natural communities, establishment of a habitat reserve system, and long-term conservation and management of habitats in the reserve system. The protection and restoration of burrowing owl, Swainson's hawk, and tricolored blackbird within the proposed project area would be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D): ▪ General Condition 1, Watershed Hydrology and Water Quality ▪ General Condition 4, Temporary Effects ▪ General Condition 5, Conduct Worker Training ▪ Regional Public Projects Condition 3, Operation and Maintenance BMPs ▪ Species Condition 3, Western Burrowing Owl ▪ Species Condition 4, Tricolored Blackbird ▪ Species Condition 1, Swainson's Hawk	▪ Avoid and minimize impacts to special-status birds. ▪ Quantify unavoidable impacts. ▪ Obtain take coverage from PCCP in accordance with the Participating Special Entity's Implementing Agreement. ▪ Pay applicable mitigation fees.	Placer Conservation Authority WPWMA	Prior to conducting activities that may impact special-status birds.	Frequency: Satisfied prior to construction commencing. Duration: Mitigation monitoring responsibility is transferred to PCA upon fee payment by the WPWMA.
Mitigation Measure 7-5: Impacts on Wetlands or Other Sensitive Natural Communities The anticipated permanent impacts to wetlands would be offset through a watershed-based approach as described in the CARP (Placer County 2020c). Both the HCP/NCCP and CARP require compensatory mitigation for wetland impacts to be implemented at 1.5:1 through payment into an ILF Program or purchase of mitigation credits at an agency-approved mitigation bank, or through land dedications in lieu of fee payments. Most of this mitigation would be achieved through the enhancement (rehabilitation) of wetlands and waters, and creation (establishment) or restoration (re-establishment) of 2,715 acres of constituent habitats that would be considered protected wetlands and	▪ Delineate all aquatic resources. ▪ Implement all feasible avoidance and minimization measures described in the PCCP and CARP. ▪ Quantify unavoidable impacts. ▪ Implement proposed wetland mitigation in the CARP.	Placer Conservation Authority WPWMA	Prior to conducting activities that impact wetlands and/or other sensitive natural communities.	Frequency: Satisfied prior to construction commencing.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
waters (Placer County 2020c). Overall, the proposed wetland mitigation in the CARP would maintain or improve the functions and services of wetlands, including special aquatic sites, within the larger PCCP area. The PCCP includes several objectives and conservation measures to prevent net loss of functions and services within the larger PCCP area. These objectives and measures would allow preserved, enhanced, and established and re-established wetlands and waters to maintain or improve the physical, chemical, and biological processes of wetlands in these landscapes, including nutrient cycling, vegetation structure, plant and animal diversity, habitat for rare or listed species, and habitat linkages and corridors. The services that these wetlands provide would include such benefits as flood control, groundwater recharge, and maintenance of water quality in receiving waters. The protection and restoration of protected wetlands and waters within the proposed project area would be supported by the following conditions from the PCCP (Placer County 2020b) (Appendix D): ▪ General Condition 1, Watershed Hydrology and Water Quality ▪ General Condition 3, Land Conversion ▪ General Condition 4, Temporary Effects ▪ Regional Public Project Condition 3, Operation and Maintenance BMPs The CARP provides additional specific avoidance and minimization measures, summarized in Table 4.2 of that document (Placer County 2020c). The PCCP objectives, conservation measures, and conditions establish performance standards for measuring the effectiveness of proposed conservation actions. The acres of protection and restoration and the commitment to ratios established in the CARP satisfy the typical mitigation that would be applied to the proposed project impacts, as well as mitigating the effects of the other conservation measures. The proposed conditions further demonstrate the intent to avoid and minimize effects and to maintain or improve wetland and water functions and services over the life of the PCCP. Consistent with SAP Program NR-4, PCCP, and CARP, the WPWMA shall delineate all aquatic resources, implement all feasible avoidance and minimization measures described in the PCCP and CARP, calculate the extent of impacts, and provide compensatory mitigation according to the procedures described in the PCCP and CARP through payment of applicable mitigation fees to the ILF Program or purchase of mitigation credits at an agency-approved mitigation bank. The PCCP allows for consideration of land dedication in lieu of PCCP fees, subject to approval by the future Placer Conservation Authority and concurrence by the state and federal agencies. The fees collected through the ILF Program will be used to fund land acquisition; mitigation projects that protect, enhance, and restore aquatic resources; and long-term management and monitoring in the PCCP Reserve Acquisition Areas.	▪ Calculate the extent of impacts and provide compensatory mitigation according to the procedures described in the PCCP and CARP through payment of applicable mitigation fees to the ILF Program or purchase of mitigation credits at an agency-approved mitigation bank.			Duration: Mitigation monitoring responsibility is transferred to PCA upon fee payment by the WPWMA.
Mitigation Measure 7-7: Conflicts with Local Ordinances. Actions consistent with the following measure from the SAP shall be implemented so that the proposed project does not conflict with the County Tree Ordinance: ▪ ***SAP Mitigation Measure 4.4-7a: Avoid or compensate for loss of protected trees.*** – The County will require future projects, including for offsite improvements, to avoid tree removal or death if feasible and appropriate, through incorporation of these features into project design and planning. – All trees retained onsite will be protected from construction-related impacts by placing exclusion fencing 1 foot outside the drip line of retained trees, or 1 foot outside the outer edge of the riparian woodland habitat and maintaining said fencing through the duration of construction. – If any trees protected under the County ordinance cannot feasibly be avoided, they will be mitigated through the payment of PCCP land conversion fees and incorporation of its avoidance and minimization measures into the project.	▪ Avoid or compensate for loss of protected trees by implementing the measures from the SAP to avoid conflicts with the County Tree Ordinance.	WPWMA Placer County	Prior to conducting activities that impact protected trees.	Frequency: One time for the payment of any necessary fees and through the duration of construction. Duration: Mitigations will be implemented through the duration of construction.
Chapter 8, Cultural and Tribal Resources				

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 8-2: Disturbance of Tribal Cultural Resources Discovered during Construction. If any suspected tribal cultural resources are discovered during ground-disturbing construction activities, work shall cease within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. A Tribal Representative from the United Auburn Indian Community of the Auburn Rancheria (UAIC) shall be immediately notified to determine whether the find is a tribal cultural resource (PRC §21074). The Tribal Representative will make recommendations for further evaluation and treatment as necessary. Preservation in place is the preferred alternative under CEQA and UAIC protocols, and every effort shall be made to preserve the resources in place, including through project redesign. Culturally appropriate treatment may include processing materials for reburial, minimizing handling of cultural objects, leaving objects in place within the landscape, or returning objects to a location within the project area where they will not be subject to future impacts. The UAIC does not consider curation of tribal cultural resources to be appropriate or respectful and requests that materials not be permanently curated unless approved by the tribe. The WPWMA's contractors will implement any measures deemed by the WPWMA to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil. Work at the discovery location cannot resume until the necessary investigation and evaluation of the discovery pursuant to CEQA and AB 52 has been satisfied.	▪ Implement measures to preserve tribal cultural resources if they are discovered during ground-disturbing construction activities.	WPWMA UAIC if tribal cultural resources are discovered	Communication with UAIC prior to construction. Discovery and reporting will occur during ground-disturbing construction activities.	Frequency: During ground-disturbing construction activities. Duration: Until ground-disturbing construction activities are complete.
Mitigation Measure 8-3: Disturbance of Archaeological Resources Discovered during Construction. If any prehistoric-era or historic-era archaeological resources are discovered during ground-disturbing activities, work within 100 feet of the resources shall be halted, and a qualified archaeologist will be consulted to assess the significance of the find according to CEQA Guidelines Section 15064.5. If any find is determined to be significant, the WPWMA and the archaeologist would determine the appropriate avoidance measures or other appropriate mitigation. If the archaeologist determines that the find is potentially a tribal cultural resource (for example, a prehistoric-era archaeological site), the archaeologist shall notify the WPWMA, and the procedures described in Mitigation Measure 8-2 shall be followed. All significant cultural materials recovered shall be, as necessary and at the discretion of the consulting archaeologist, subject to scientific analysis, curation (unless it is a tribal cultural resource), and documentation according to current professional standards. In considering any suggested mitigation proposed by the consulting archaeologist to mitigate impacts to archaeological resources, the WPWMA shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, proposed project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures (for example, data recovery) shall be instituted. Work may proceed on other parts of the project site while mitigation for historical or unique archaeological resources is being carried out.	▪ Implement feasible measures to mitigate impacts to archaeological resources if discovered during ground-disturbing activities.	WPWMA UAIC if tribal cultural resources are discovered	Communication with Placer County prior to construction. Discovery and reporting will occur during ground-disturbing construction activities.	Frequency: During ground-disturbing construction activities. Duration: Until ground-disturbing construction activities are complete.
Mitigation Measure 8-4: Disturbance of Human Remains. As required by the provisions of California's *Health and Safety Code* Section 7050.5, PRC Section 5097.98, and the *California Code of Regulations* Section 15064.5 (CEQA), if human remains are encountered at the site, work in the immediate vicinity of the discovery shall cease, and necessary steps to secure the integrity of the immediate area shall be taken. The Placer County Coroner shall be notified immediately. The coroner will then determine whether the remains are Native American. If the coroner determines the remains are Native American, the coroner will notify the Native American Heritage Commission (NAHC) within 24 hours, who will, in turn, notify the person the NAHC identifies as the most likely descendant (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the WPWMA shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the WPWMA does not accept the MLD's recommendations, the WPWMA or the MLD may request mediation by the NAHC.	▪ If human remains are discovered, notify the Placer County Coroner and implement the appropriate actions to respectfully handle the found human remains.	WPWMA Placer County Coroner NAHC and UAIC if remains determined to be Native American	Communication with UAIC should begin prior to construction. Discovery and reporting will occur during ground-disturbing activities.	Frequency: Monitored during construction activities. Duration: During construction activities.
Chapter 9, Geology, Soils, and Paleontological Resources				
Mitigation Measure 9-4: Presence of Expansive Soils. Consistent with *California Building Standards Code,* Section 1808.2, and Placer County General Plan Policy 8.A.1, the WPWMA shall conduct a geotechnical investigation prior to constructing any buildings or other structures designed for human occupancy that may be exposed to	▪ Procure the services of a qualified and licensed civil engineer, geotechnical engineer, or certified engineering geologist. ▪ Conduct geotechnical investigation.	WPWMA	Prior to design and construction.	Frequency: Daily as part of construction quality assurance.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
expansive soils. The geotechnical report shall be prepared by a qualified and licensed civil engineer, geotechnical engineer, or certified engineering geologist. During project construction, all recommendations outlined in the geotechnical report shall be implemented, subject to revision by the civil or geotechnical engineer or engineering geologist where needed, and verified by a construction quality assurance observer. Typical recommendations could include over-excavating the foundations, reinforcing the foundations, and using fill soil to minimize the exposure of the foundations to the effects of the expansive soils.	▪ Implement all recommendations outlined in the geotechnical report during construction. ▪ Verify implementation by a CQA professional.			Duration: During project construction.
Mitigation Measure 9-5: Potential Destruction of Paleontological Resources. If evidence of any paleontological features or deposits are discovered during construction-related earth-moving activities (for example, vertebrate, invertebrate, or plant fossils, traces, or trackways), the WPWMA shall halt ground-disturbing activity in the area of the discovery and retain a qualified paleontologist to assess the significance of the find. If the paleontologist determines that the find does not constitute a significant or unique resource, construction may proceed. If the paleontologist determines that further information is needed to evaluate significance, a data recovery plan shall be prepared. If the find is determined to be significant by the qualified paleontologist, they shall work with the WPWMA to avoid disturbance to the resources. If complete avoidance is not feasible in light of project design, economics, logistics, or other factors, accepted professional standards for documentation of any find and recovery of important fossils shall be followed.	▪ Observe ground-disturbing activities during construction for evidence of paleontological features or deposits. ▪ Halt work when there is evidence of a find. ▪ Retain a qualified paleontologist to assess the find. ▪ Prepare a data recovery plan, if necessary. ▪ Avoid disturbance if feasible. If avoidance is not feasible, implement standards for documentation of the find and discovery.	WPWMA	During construction-related ground-disturbing activities if encountered.	Frequency: Throughout construction-related ground-disturbing activities. Duration: Throughout construction until ground-disturbing activities are complete.
Chapter 10, Greenhouse Gas Emissions and Climate Change				
Mitigation Measure 10-1: Fund GHG Emissions Reductions through an Offsite Mitigation Fee Program. WPWMA and their operation contractor(s) shall document their capability and commitment to implement the GHG BMPs and project design measures[4] identified in Table 10-1 as part of their contracts and plan submittals. To further mitigate the significant GHG impacts identified for the proposed project, WPWMA shall participate in one of the following voluntary offsite mitigation programs: ▪ Establish and fund an offsite mitigation project to result in a GHG emission reduction equivalent to the total amount of emissions estimated to exceed the PCAPCD significance threshold over a single year. Developing an offsite mitigation program in western Placer County shall be coordinated with PCAPCD. Emission reductions achieved through the offsite mitigation program must be real and quantifiable, as verified by PCAPCD. ▪ Participate in PCAPCD's Offsite Mitigation Fee Program by paying the equivalent amount of money to mitigate the net annual project contribution of GHG that exceeds the PCAPCD threshold. The actual amount to be paid shall be determined according to the selected program and applicable cost-effectiveness rate agreed to by WPWMA and PCAPCD. (Please note that there is currently no mitigation fee option for GHG offsite mitigation, because there is no fee rate or cost-effectiveness factor established by a statewide incentive program.) ▪ Any combination of these or other measures, as determined feasible by WPWMA and PCAPCD. If an offsite mitigation measure is required for a land-use project, that mitigation measure shall explicitly identify the required GHG emissions reduction and the implementation method. PCAPCD's Board of Directors adopted the Review of Land Use Projects under CEQA Policy in 2016, which outlines the principles on how the GHG offsite mitigation measures should be implemented, by the selected mitigation scenarios, to offset the land-use project's related operational GHG emissions. The project applicant has two options to implement offsite mitigation measures for GHG emissions: (1) proposing their own offsite mitigation project or (2) purchasing carbon credits from recognized carbon credit registries. When offsite mitigation is an option used to mitigate the project's operational impacts, additional (surplus) emission reductions achieved from offsite sources should be equal to the emission reductions required to mitigate the land-use project's onsite impacts. This can provide the proper nexus for GHG emission mitigation under CEQA. For example, excessive GHG emissions from a land-use project's energy usage could be reduced by a project that would generate the same amount of surplus GHG emission reductions by renewable energy. Prior to implementation of an offsite mitigation project, the applicant shall consult with PCAPCD and demonstrate that the project meets all conditions required by a selected carbon credit protocol approved by California Air Pollution Control Officers Association (CAPCOA), CARB, or	▪ Revise RFP language, operational contracts, and site plans to require implementation of operational mitigation measures, BMPs, and project design measures, including capability and commitment to implement the GHG BMPs and project design measures identified in Table 10-1. ▪ WPWMA to coordinate with PCAPCD to determine which voluntary offsite mitigation program(s) for GHGs would be most feasible and cost-effective and participate as required. ▪ Prior to implementation of offsite mitigation or purchase of offset credits, consult with PCAPCD and demonstrate that the project meets all conditions required by a selected carbon credit protocol approved by CAPCOA, CARB, or other similar entities determined acceptable by PCAPCD. ▪ For land-use projects, identify the required GHG emissions reductions and their implementation method.	WPWMA PCAPCD	Mitigation measures, BMPs, and project design measures implemented on an ongoing basis for project operations.	Frequency: Applicability should be evaluated periodically as various construction projects are planned and project elements are implemented. Duration: Monitoring occurs from project design through construction and operations.

[4] Note: Applicable measures from PCAPCD's recommended GHG emission mitigation measures (PCAPCD 2017) are incorporated in the proposed project as project design measures. For the list of BMPs and project design measures incorporated in the proposed project, please see the list of measures in Table 10-1, Current Emission Reduction Measures and Best Management Practices Incorporated as Project Design Measures.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
other similar entities determined acceptable by PCAPCD. If the applicant chooses to purchase carbon credits, the credits should be registered under the CAPCOA GHG Reduction Exchange Program, American Carbon Registry, Climate Action Reserve, or other similar carbon credit registry as determined acceptable by PCAPCD. This requirement means that the proposed mitigation project or carbon credit purchase can result in an equivalent GHG reduction required by the offsite mitigation measure. In addition, PCAPCD encourages the applicant to consider generating or purchasing local and California-only carbon credits as the preferred mechanism for implementing the GHG offsite mitigation measure, which helps direct the state toward achieving the GHG emission reduction goal. The following are well-recognized entities with approved carbon offset protocols or registered carbon credits that can be applied toward a land-use project's GHG emission reductions: ▪ CAPCOA GHG Reduction Exchange Program (GHG Rx) ▪ CARB Compliance Offset Protocols ▪ Verified Carbon Standard (Verra) ▪ American Carbon Registry ▪ Climate Action Registry PCAPCD notes that it will not be involved with any carbon credit purchase agreements; PCAPCD is only assisting the lead agency with verification of the carbon credits to confirm they are real, permanent, quantifiable, verifiable, enforceable, and additional.				
Chapter 11, Hazards, Hazardous Materials, and Wildfire				
Mitigation Measure 11-1: Potential for Construction Activities to Expose the Public or the Environment to Hazardous Materials. A Phase I ESA shall be prepared prior to the construction of any facilities on the western or eastern properties in general conformance with the ASTM E 1527-13 "Standard Practice for Environmental Site Assessments" and U.S. Environmental Protection Agency "Standards and Practices for All Appropriate Inquires," 40 CFR Part 312. If existing hazardous materials contamination is identified in the Phase I ESA, and the Phase I ESA recommends further review, the WPWMA shall retain a Registered Environmental Assessor or other qualified professional to conduct follow-up sampling to characterize the contamination and to identify any required remediation that shall be conducted. Any remediation recommendations shall be implemented before earth disturbance in the vicinity of the contamination. In addition, a construction hazardous materials management plan shall be prepared by the WPWMA or the WPWMA's construction-manager/contractor for all future development projects on the western and eastern properties and shall be incorporated into the construction and contract specifications for each project. The management plan shall include measures to reduce potential hazards to workers, the public, and the environment associated with use of hazardous materials and exposure to potentially contaminated soil during project construction. The management plan shall include provisions managing impacted materials, sampling and analytical requirements and disposal procedures. Specifically, the construction hazardous materials management plan shall: ▪ Describe the necessary actions to be taken if evidence of contaminated soil or groundwater is encountered during construction. ▪ Describe the types of evidence that could indicate potential hazardous materials contamination, such as soil discoloration, petroleum or chemical odors, or buried building materials. ▪ Include measures to protect worker safety if signs of contamination are encountered. ▪ Identify sampling and analysis protocols for various substances that might be encountered. ▪ List required regulatory agency contacts if contamination is found. ▪ Include recommendations on soil management in the event that aerially deposited lead is discovered in existing road right-of-way. ▪ Identify legal and regulatory processes and thresholds for cleanup of contamination. ▪ Include provisions for delineation, removal, and disposal of any contaminants identified as exceeding human health risk levels. ▪ Require that the project contractor verify that suspect soils are isolated, protected from runoff, and disposed of in accordance with Section 31303 of the *California Vehicle Code* and the requirements of the licensed receiving facility.	▪ Retain a qualified firm to perform a Phase 1 ESA prior to construction of any facilities on the western or eastern properties. ▪ Implement any remediation recommendations before earth disturbance in the vicinity of the contamination. ▪ Ensure that a construction hazardous materials management plan is prepared.	WPWMA	Prior to construction of any facilities on the eastern or western properties.	Frequency: Phase 1 ESA shall be prepared 1 time prior to construction. The construction hazardous materials management plan shall be prepared prior to construction of all facilities on the western and eastern properties. Duration: Construction hazardous materials management plans shall be prepared and implemented until all facilities on the western and eastern properties are constructed.

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
Mitigation Measure 11-3: Potential for Landfill Gas to Accumulate in Occupied Structures. For any structure sited within 1,000 feet of the WRSL within the project's boundary, the following measures specified in *California Code of Regulations* (CCR) Title 27 Section 21190(g) shall be included: ▪ A geomembrane or equivalent system with low permeability to landfill gas shall be installed between the concrete floor slab of the building and subgrade. ▪ A permeable layer of open graded material of clean aggregate with a minimum thickness of 12 inches shall be installed between the geomembrane and the subgrade or slab. ▪ A geotextile filter shall be used to prevent the introduction of fines into the permeable layer. ▪ Perforated venting pipes shall be installed within the permeable layer, and shall be designed to operate without clogging. ▪ The venting pipe shall be constructed with the ability to be connected to an induced draft exhaust system. ▪ Automatic methane gas sensors shall be installed within the permeable gas layer, and inside the building to trigger an audible alarm when methane gas concentrations are detected. In addition, the WPWMA shall use a qualified specialist to conduct periodic methane gas monitoring (pursuant to CCR Section 20920 et. seq.) inside all buildings and underground utilities.	▪ Implement the listed construction measures and monitoring requirements for any structure constructed within 1,000 feet of the WRSL property boundary.	Placer County Department of Environmental Health	During design of occupied structures within 1,000 feet of WRSL.	Frequency: Once during design and ongoing through building construction. Methane gas monitoring shall be conducted periodically. Duration: Throughout design of any new structures within 1,000 feet of the WRSL property boundary and ongoing through building construction. Methane gas monitoring shall be conducted periodically.
Mitigation Measure 11-4: Potential for Waste Relocation Activities to Release Hazardous Materials into the Environment. Prior to commencing waste relocation activities, the WPWMA shall develop and implement a contingency plan in case hazardous wastes are encountered during waste relocation. The contingency plan shall be based on guidelines issued by the State of California Governor's Office of Emergency Services (CA OES 2001) for preparation of a Hazardous Material Incident Contingency Plan that describes emergency procedures and actions to be implemented to minimize hazards and release hazardous materials.	▪ Develop and implement a Hazardous Material Incident Contingency Plan in case hazardous wastes are encountered during waste relocation.	WPWMA	During the planning phase of the waste relocation project.	Frequency: Continuously during waste relocation activities. Duration: Throughout waste relocation activities.
Mitigation Measure 11-5: Potential Conflict with an Adopted Emergency Response Plan. Before construction activities commence, the WPWMA shall prepare a Construction Traffic Management Plan to minimize traffic impacts on all roadways at and near the work site affected by construction activities. The plan shall identify construction and public (if applicable) access points, procedures for notification of lane closures, a construction materials delivery plan, and a description of emergency personnel access routes during lane closures. This plan shall include measures that provide adequate access for emergency evacuation, including maintaining bypass lanes around any roadway construction sites.	▪ Prepare and implement a Construction Traffic Management Plan.	WPWMA	Prior to construction activities.	Frequency: One-time preparation with updates as needed. Duration: Construction Traffic Management Plan is applicable during construction activities.
Mitigation Measure 11-7: Risk of Vectors. During construction, all grading shall be performed by contractors in a manner to prevent the occurrence of standing water or other areas suitable for breeding of mosquitoes and other vectors. The Placer Mosquito and Vector Control District shall be granted access to perform vector control both during construction and operation of the proposed project. This includes ongoing access to all common areas including drainages. As part of the access agreement with Placer Mosquito and Vector Control District, the WPWMA shall require that the district use appropriate vector control methods in biologically sensitive areas to minimize any potential adverse effects to sensitive wildlife and plant species or their habitat.	▪ Ensure contracts require that all construction grading shall be performed by contractors in a manner to prevent the occurrence of standing water or other areas suitable for breeding of mosquitoes and other vectors. ▪ Allow access to the Placer Mosquito and Vector Control District for vector abatement.	Placer Mosquito and Vector Control District WPWMA	During construction and operation.	Frequency: Throughout construction and operation. Duration: During construction. Seasonally during operations.
Chapter 12, Hydrology and Water Quality				
Mitigation Measure 12-3: Potential for Waste Excavation and Relocation to Degrade Surface Water or Groundwater Quality.	▪ Amend the existing project SWPPP for the waste excavation and relocation component of the project prior to ground-disturbing activities.	WPWMA CVRWQCB	Prior to ground-disturbing activities	Frequency: Daily actions required to mitigate

Table A-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Action Required	Entity Responsible for Monitoring and Verifying Compliance	Timing of Initial Action	Frequency and Duration of Monitoring
▪ To implement the state and local regulatory policies intended to address the potential for violating water quality standards or WDRs, or otherwise substantially degrading surface or ground water quality, the WPWMA shall Amend the existing project SWPPP for the waste excavation and relocation component of the project. The SWPPP may include the following BMPs: – Where excavation and removal occurs over an unlined area, the project will implement secondary containment in the direct path of hauling and removal. – The project shall avoid excavation and relocation of waste between October 15 and April 30 unless such activities are adequately mitigated to avoid impacts during the rainy season. – If excavation and relocation of waste activities cannot be avoided during this period, the WPWMA shall implement use of tarps or soil cover over the exposed face overnight and when the activity will not occur for more than 24 hours. The SWPPP shall be prepared and implemented prior to ground-disturbing activities commencing for the waste excavation and relocation component of the proposed project.				potential issues. Monthly and quarterly inspections as required by the SWPPP. Duration: Actions and monitoring required for the duration of waste relocation activities as required by the SWPPP.
Chapter 14, Noise				
Mitigation Measure 14-2: Increase in Operational Noise Levels. The WPWMA shall conduct an acoustical evaluation of any facility proposed as part of the complementary and programmatic elements prior to issuance of building permits. The acoustical evaluation shall document that either the proposed uses will not generate noise levels greater than 5 dB above the existing ambient noise level generated from industrial facilities at the site or will be redesigned such that this threshold is not exceeded at existing receiving property boundaries.	▪ Conduct acoustical evaluation.	WPWMA	Prior to building permit application and issuance.	Frequency: Once per project component or during redesign as necessary. Duration: Complete when building permit issued.
Chapter 16, Transportation				
Mitigation Measure 16-2: Increase in Vehicle Miles Traveled. Prior to the initiation of project construction activities, the WPWMA shall prepare a Transportation Demand Management Plan to minimize the increase in VMT. The Transportation Demand Management Plan shall include specific measures intended to reduce employee vehicle trips, such as carpool and ride-share incentive strategies.	▪ Prepare a Transportation Demand Management Plan.	WPWMA	Prior to the initiation of project construction activities.	Frequency: One-time, update as needed. Duration: Applicable for the duration of construction and operations.

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