

**Mitigation Monitoring and Reporting Program**  
**Honeydew Bridge (N0. 4C-055) Replacement Project**

**CEQA Lead Agency:**  
**Humboldt County Public Works Department**

**Prepared: August 10, 2022**

# **1 Introduction**

## **1.0 Procedures for Monitoring and Reporting**

The purpose of the Mitigation, Monitoring, and Reporting Program (MMRP) is to provide Humboldt County with a comprehensive list of the mitigation measures identified in the Draft Environmental Impact Report (EIR)/Environmental Assessment (EA) for the Honeydew Bridge (No. 4C-055) Replacement Project (Project).

### **1.1 Introduction**

Humboldt County Public Works Department (County) and Caltrans District 1 (National Environmental Policy Act [NEPA] lead agency) have prepared an Environmental Impact Report (EIR)/Environmental Assessment (EA) for the Project.

The County is acting as the Lead Agency, as defined by the California Environmental Quality Act (CEQA). In accordance with Public Resources Code section 21081.6, a Lead Agency that approves or carries out a project with potentially significant environmental effects shall adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.”

The CEQA Guidelines provide direction for clarifying and managing the complex relationships between a Lead Agency and other agencies with respect to implementing and monitoring mitigation measures. In accordance with CEQA Guidelines section 15097(d), “each agency has the discretion to choose its own approach to monitoring or reporting; and each agency has its own special expertise.” This discretion will be exercised by implementing agencies at the time they consider any of the activities identified in the environmental document.

This MMRP is a working guide to facilitate both the implementation of the mitigation measures and the monitoring, compliance, and reporting activities by the County and any monitors it may designate. If the County Certifies the EIR for the proposed project, it will adopt the MMRP.

### **1.2 Overview of the Mitigation Monitoring and Reporting Program**

The County is responsible for implementing and completing all mitigation measures as well as for mitigation measure oversight and compliance documentation. More specifically, the proposed project has been developed, designed and managed by the County. The County will put the project out to bid, award the project to the lowest bidder, and oversee all activities related to construction. Mitigation actions required prior to construction will be performed by the County. During construction, mitigation actions will be performed by the Construction Contractor (or a subcontractor) and/or County staff.

Monitoring and reporting procedures will conform to the following stages prior to and during proposed project construction and operations:

**Stage 1 – Implementation:** This stage will be executed by the County and may be designated by the County to a Consultant and/or Contractor. All actions taken as part of this MMRP will be documented monthly and reported quarterly to the County, as described in Stages 2 and 3 below. The designee responsible for implementation of mitigation measures will:

- Review mitigation status reports and any other information generated during construction and submit them to the County for review and acceptance;
- Ensure that the mitigation measures in the MMRP are undertaken, either by the County, Contractors, or County's Consultants; and
- Verify monthly that mitigation actions are properly undertaken.

**Stage 2 – Monitoring:** This stage will be executed by the Monitor. The Monitor will be designated by the County and may be County staff or a consultant to the County. The Monitor will investigate noncompliance allegations and identify how the County, or its designees, should correct implementation of the measure. If a measure is under control of the Contractor, the Monitor will inform the County's Resident Engineer or Construction Manager (Project Manager) of the Monitor's determination and request improved implementation.

The Monitor will have the following responsibilities:

- Be knowledgeable in the mitigation that is to be monitored; and
- Verify implementation of mitigation by:
  - Verifying in the field that required implementation has been properly executed during and after construction; and
  - Contacting the Project Manager and requesting that the situation be remedied if mitigation is not being implemented or executed properly.

**Stage 3 – Reporting:** This step will be executed by the Monitor. The Monitor will have the following responsibilities:

- Compile all mitigation status reports into a Summary of Compliance. Recommendations may include updating the frequency of monitoring, changing the type of monitoring, and suggesting better ways to implement mitigation;

- Assist the County and/or Project Manager reviewing Contractor's implementation of mitigation requirements, detailing corrective action and time of completion to resolve any issues that are raised; and
- Provide all completed reports and statements to the County, and ensure they are on file and available at the County.

## **2 CEQA Mitigation Measures**

Table 2-1 below describes the mitigation measures included in the proposed project. These mitigation measures were identified in the CEQA checklist of the Draft EIR/EA where mitigation was required to bring an affected physical, biological, social and/or economic factor to less-than-significant. It should also be noted that initial avoidance and minimization measures were developed to address potential adverse effects on the environment. In those situations where avoidance and minimization measures did not fully address potential adverse effects, mitigation measures were developed. Avoidance and measures are indicated in the Draft EIR/EA as AMMs and mitigation measures are shown as MMs. In addition to AMMs and MMs, under Threatened and Endangered, terms and conditions from the biological opinion (BO) issued by the National Marine Fisheries Service (NMFS) are provided. For compliance with CEQA, this MMRP only addresses the mitigation measures that were identified in the CEQA checklist. For each mitigation measure the required action, responsible party, implementation timing, and reporting requirements are described.

**Table 2-1 Summary of the Honeydew Bridge Replacement Project Mitigation Measures**

Mitigation Measure	Responsible Party	Monitoring Timing	Monitoring and Reporting Program	Standards for Success
<b>Section 3.2.4 - Biological Resources</b>				
<p><b>MM BIO-1: Project Footprint:</b> The project site footprint will be restricted to the minimum area necessary to complete the project. This area has been identified to be 28.10 acres in size and includes the bridge site, the detour and all construction staging areas. Within the 28.10-acre project area, there will be sub-areas of proposed work and these work areas will be identified and marked within the design/construction plans as well as identified in the field with stakes, fencing, flagging, and/or other means.</p>	<p>The County (Public Works)</p>	<p>County to verify areas of work and within design plans.</p> <p>Discuss at pre-construction meeting.</p> <p>County to stake perimeters as necessary.</p>	<p>Proposed area of work is shown on approved Area of Potential Effects (APE) map. This map will be included in the bid package and will be provided to awarded contractor.</p>	<ul style="list-style-type: none"> <li>• No work to occur outside APE map.</li> <li>• No work to occur outside of marked sub-areas as identified and confirmed in the field.</li> </ul>
<p><b>MM BIO-2: Special-Status and Migratory Birds and Raptors:</b> In order to avoid Take of any nesting species, any clearing associated with the proposed project shall occur outside of the nesting period for migratory birds, typically from March 1 through August 15 (California Department of Fish and Wildlife [CDFW] Fish and Game Code 3503, 3503.5, and 3513, and Federal Migratory Bird Act 16 United States Code [U.S.C] 703 et seq.). If clearing is to occur within the nesting window of migratory birds, CDFW and the U.S. Fish and Wildlife Service (USFWS) shall be consulted to assess the potential for Take of active nests, or a focused nesting bird survey would need to take place immediately prior to and within the area of the proposed clearing. Pre-construction surveys for nesting pairs, nests, and eggs shall occur within the construction limits and within 100 feet (200 feet for raptors) of the construction limits. If active nests are encountered, species specific measures shall be prepared by a qualified biologist in consultation with the USFWS and CDFW and implemented to prevent abandonment of the active nest.</p>	<p>The County (Public Works)</p>	<p>County to verify notes on design plans prior to project bidding.</p> <p>Discuss at pre-construction meeting.</p> <p>County to stake perimeters as necessary.</p>	<p>The survey(s) shall be conducted by a qualified biologist in consultation with USFWS and CDFW. Add as a construction note on design plans.</p>	<ul style="list-style-type: none"> <li>• No disturbance of special status species or nesting birds covered by CDFW and USFWS. Species specific measures shall be implemented as required.</li> </ul>

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Mitigation Measure	Responsible Party	Monitoring Timing	Monitoring and Reporting Program	Standards for Success
<p><b>MM BIO-3: Pallid Bat:</b> The following measures will be used to avoid or minimize project-related impacts on pallid bats:</p> <ul style="list-style-type: none"> <li>To the extent practicable, removal of large trees with cavities and removal of the existing bridge shall occur before maternity colonies form (i.e., before March 1) or after young are volant (i.e., after August 15). The removal of the existing bridge during this time period may not be feasible, because the existing bridge must be removed during the in-water construction period (June 15 through October 15).</li> <li>Exclusionary devices may be placed over potential bat habitat on the existing bridge between August 15 and March 1 during the year before construction to prevent bats from forming maternity colonies.</li> <li>If construction (including the removal of large trees and the existing bridge) occurs during the non-volant season (March 1 through August 15), a qualified biologist shall conduct a pre-construction survey of the BSA to locate maternity colonies. The pre-construction survey will be performed no more than 14 days before the implementation of construction activities (including staging and equipment access). If a lapse in construction activities for 14 days or longer occurs between those dates, another pre-construction survey will be performed. If a maternity colony is present, bridge or tree removal shall not occur until it is determined that the young are volant.</li> </ul>	<p>The County (Public Works),</p>	<p>County to verify notes on design plans prior to project bidding.</p> <p>Discuss at pre-construction meeting.</p> <p>County to identify/flag potential nesting trees as necessary.</p>	<p>The survey(s) shall be conducted by a qualified biologist in consultation with CDFW.</p> <p>Add survey(s) as construction note on design plans.</p> <p>Coordinate with Project Manager and Contractor on potential habitat and survey results.</p>	<ul style="list-style-type: none"> <li>No disturbance of Pallid Bat habitats.</li> <li>Remediation of degraded areas if required.</li> </ul>

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<p><b>MM BIO-4: Ring-Tailed Cat and Sonoma Red Tree Vole:</b> The following measures will be used to avoid or minimize project-related impacts on ring-tailed cats and Sonoma Red Tree Vole:</p> <ul style="list-style-type: none"> <li>• Tree removal will be minimized, and large snags and old growth trees will be avoided, to the extent feasible.</li> <li>• Remove all trees during the non-denning period (July 1–April 30). Trees may be removed during the denning season for ring-tailed cat (May 1–June 30) if surveys during the denning season reveal no potential natal or denning/nesting trees within the removal area.</li> <li>• If vegetation removal is to occur during the denning season (May 1-June 30), a qualified biologist will survey for potential natal or maternity den trees using protocol search techniques within areas slated for vegetation removal and within 375 feet of the vegetation removal area.</li> </ul> <p>If no potential denning trees are observed within 375 feet of vegetation removal, these restrictions would not be necessary.</p>	<p>The County (Public Works),</p>	<p>County to verify notes on design plans prior to project bidding.</p> <p>Discuss at pre-construction meeting.</p> <p>County to identify/flag potential nesting trees as necessary.</p>	<p>The survey(s) shall be conducted by a qualified biologist in consultation with CDFW.</p> <p>Add survey(s) as a construction note on design plans.</p>	<ul style="list-style-type: none"> <li>• No disturbance of Ring-Tailed Cat habitats.</li> <li>• No disturbance of Sonoma Red Tree Vole habitats.</li> <li>• Remediation of degraded areas if required.</li> </ul>
<p><b>Section 3.2.4 - Biological Resources – Wetlands</b></p>				
<p><b>MM WET-1 – MM WET-4: Wetlands:</b> The following mitigation measure will also be used to reduce the significance of project impacts on waters of the United States, including wetlands:</p> <p><b>MM WET-1:</b> Before any discharge of dredged or fill material into waters of the United States, including wetlands, authorization under a Nationwide Permit shall be obtained from USACE. For any features determined not to be subject to USACE jurisdiction during the verification process, authorization to discharge shall be obtained from the Regional Board. For fill requiring a USACE permit, water quality certification shall be obtained from the Regional Board before discharge of dredged or fill material.</p>	<p>The County (Public Works)</p>	<p>County to verify wetland areas on design plans prior to project bidding.</p> <p>Discuss at pre-construction meetings.</p>	<p>The County shall obtain all required state and federal permits prior placing the project out to bid.</p> <p>The County shall develop and implement a revegetation mitigation and monitoring plan for impacts to waters of the U.S. and waters of the State.</p>	<ul style="list-style-type: none"> <li>• Requirements for state and federal permit applications are followed.</li> <li>• Impacted riparian vegetation are replaced at a 1:1 ratio and native riparian vegetation are replanted along river segments.</li> </ul>

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<p><b>MM WET-2:</b> Before any activities that would obstruct the flow of, or alter the bed, channel, or bank of any intermittent or ephemeral creeks, notification of streambed alteration shall be submitted to the CDFW and, if required, a streambed alteration agreement shall be obtained from CDFW.</p> <p><b>MM WET-3:</b> Any monitoring, maintenance, and reporting required by the regulatory agencies (i.e., USACE, Regional Board, and CDFW) shall be implemented and completed. All measures contained in the permits or associated with agency approvals shall be implemented.</p> <p><b>MM WET-4:</b> Impacts on riparian wetlands will be mitigated onsite. For the purposes of this mitigation, riparian habitat is synonymous with riparian wetlands. Wetlands mitigation planting will occur on the banks of the Mattole River after the northern work pad and the temporary detour road have been removed. The plantings will be done in kind and at a 3:1 ratio.</p>	<p>The County (Public Works)</p>	<p>County shall monitor mitigation for 5 years or until success criteria has been achieved</p>	<p>County shall insure that all mitigation has been implemented and monitoring and maintenance of mitigation sites continues until success criteria is achieved.</p>	



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<b>Section 3.2.9 - Hazards and Hazardous Materials</b>				
<p><b>MM HAZ-1: Inadvertent Discovery of Hazardous Materials or Waste:</b> Contamination that is unknown until exposure and discovery during construction will require sampling and testing before removal from the site and subsequent disposal. Health and Safety Code 25914.2 specifies that unanticipated hazardous substances (including hazardous waste) and/or asbestos encountered during construction cannot legally be tested or managed and removed by the prime contractor who discovered it. Hazardous substances and asbestos can only be managed by the prime contractor if this work was specifically included in the original contract documents. Therefore, a contract change order cannot be used in these situations. Caltrans has an on-call Construction Emergency Response Contract (Department use only) managed by the Division of Environmental Analysis, Hazardous Waste, Air, and Noise Office that can be accessed to appropriate testing and disposal performed for Department administered projects. Consult the current <i>Unanticipated Hazardous Waste Decision Tree</i> (Caltrans 2014) (Figure 2-8 in the DEIR/EA).</p>	<p>The County (Public Works) and Contractor</p>	<p>The County to condition the need for a Hazardous Waste Management Plan to be submitted by awarded Contractor prior to construction.</p> <p>Discuss at preconstruction meeting.</p>	<p>If hazardous materials are encountered during any project-related activity, the Contractor shall notify the Project Manager immediately for proper procedures.</p>	<p>Inadvertent discovery of hazardous materials or waste is avoided.</p> <p>In the unlikely event hazardous materials or waste are found/identified, then proper management and disposal of said materials are followed per State and Federal regulations.</p>
<p><b>MM HAZ-2: Asbestos:</b> The Preliminary Site Investigation (PSI) determined that all suspected ACM did not contain asbestos above the laboratory detection limit. Despite the low levels of asbestos detected in the project area, NESHAP regulations require notification of the demolition to be submitted to the Air District and the USEPA (NESHAP Section 61.145(b)). Notifications must contain certain specified information including but not limited to the scheduled start and completion date of the work, the location of the site, the names of operators or asbestos removal contractors, methods of removal and the amount of asbestos, and whether the operation is a demolition or renovation.</p>	<p>The County (Public Works) and Contractor</p>	<p>The County to condition the need for a Hazardous Waste Management Plan to be submitted by awarded Contractor prior to construction.</p> <p>Discuss at preconstruction meeting.</p>	<p>Despite the low levels of asbestos detected in the project area, NESHAP regulations shall be followed.</p>	<p>NESHAP regulations are followed, which require notification of demolition to be submitted to the Air District and the USEPA (NESHAP Section 61.145(b))</p>

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<p><b>MM HAZ-3: Lead-based Paint:</b> The following BMPs will be used when project activities involve the handling of LBP:</p> <ul style="list-style-type: none"> <li>• LBP shall be abated before planned construction/demolition by a licensed contractor in accordance with 17 CCR 3500.</li> <li>• LBP must be transported under a Uniform Hazardous Waste Manifest (Title 22 CCR, Section 6626.23). It must be disposed of either at a Class I landfill or at other landfills that have specific permits to accept these wastes.</li> <li>• Demolition and construction work shall be subject to the applicable work practices for LBP and lead hazards including:               <ul style="list-style-type: none"> <li>○ California Construction Order 1532.1(a)</li> <li>○ Lead-in-Construction Standard</li> <li>○ Title 17, CCR (CCR), Division 1, Chapter 8</li> <li>○ Work Practices for Lead-Based Paint and Lead Hazards</li> </ul> </li> <li>• If more than 100 square or linear feet of lead-containing materials are disturbed, steps must be taken to prevent worker exposure to lead. The Department of Industrial Relations shall be notified at least 24 hours before beginning work.</li> </ul>	<p>The County (Public Works) and Contractor</p>	<p>The County to condition the need for a Hazardous Waste Management Plan to be submitted by awarded Contractor prior to construction.</p> <p>Lead-based paint abatement condition and guidelines shall be listed in the construction bid documents.</p> <p>Discuss at preconstruction meeting.</p>	<p>Contractor is aware of BMPs under MM HAZ-3</p>	<p>BMPs listed under MM HAZ-3 are followed and recorded by Contractor and Project Manager.</p>

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<p><b>MM HAZ-4: Treated Wood Waste:</b> The County shall include provisions in the construction bid documents to ensure the proper removal and disposal of treated wood waste material found on the existing bridge. The following measure shall be implemented to reduce construction-related environmental impacts that could result from treated wood waste removal: The contractor will remove treated wood waste following the alternative management standards specific under Caltrans Non-Special Stand Provision (NSSP) 14-11.14 for treated wood waste, as well as AB 332 AMS contained in statutes (Health and Safety Code section 25230 – 25230.18) and CCR Title 22, Chapter 34, Sections 67386.1 through 67386.12 (2020) for labeling, accumulation, off-site shipment tracking, notification, treatment, and disposal. All personnel that may come into contact with treated wood waste will receive, at a minimum, training on safe handling, sorting and segregating, storage, labeling (including date), and proper disposal methods.</p>	<p>The County (Public Works) and Contractor</p>	<p>The County to condition the need for a Hazardous Waste Management Plan to be submitted by awarded Contractor prior to construction.</p> <p>Treated Wood Waste abatement conditions and guidelines shall be listed in the construction bid documents.</p> <p>Discuss at preconstruction meeting.</p>	<p>Contractor is aware of proper removal and disposal of treated wood waste.</p> <p>All personnel that may come into contact with treated wood waste shall have training on safe handling, storage, labeling and disposal methods.</p> <p>All treated wood waste (amounts/quantities) shall be documented prior to disposal.</p>	<p>All treated wood waste (amounts/quantities) shall be documented prior to disposal.</p> <p>Proper management and disposal of treated wood waste materials are followed per State and Federal regulations</p>
<p><b>MM HAZ-5: Wildfire Potential:</b> The County shall include provisions in the construction bid documents to minimize the potential for ignition of wildfire as a result of project construction. The following measure shall be implemented to reduce construction-related wildfire ignition potential: Per the requirements of PRC 4442, the County shall include a note on all construction plans that internal combustion engines shall be equipped with an operational spark arrester, or the engine must be equipped for the prevention of fire.</p>	<p>The County (Public Works) and Contractor</p>	<p>County to include provisions in the construction bid documents to minimize the potential for ignition of wildfire as a result of project construction.</p> <p>Discuss at preconstruction meeting.</p>	<p>County shall include a note on all construction plans that internal combustion engines shall be equipped with an operational spark arrester, or the engine must be equipped for the prevention of fire.</p>	<p>Project Manager to ensure prevention measures are followed.</p>

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<b>Section 3.2.13 - Noise</b>																																
<p><b>MM NOI-1: Noise:</b> The proposed Humboldt County noise ordinance standards described in the table below will be used during project construction to avoid or minimize the adverse effects on sensitive receptors near the project area.</p> <p>Humboldt County Proposed Noise Ordinance Standard Policy: No Use Shall Create Ambient Noise Levels Exceeding Standards.</p> <table border="1"> <thead> <tr> <th>Land Use Designation</th> <th>Time Period</th> <th>Noise Level (dB)</th> <th>Noise Level (dB)</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Residential</td> <td>7 am–10 pm</td> <td>50</td> <td>70</td> </tr> <tr> <td>10 pm–7 am</td> <td>55</td> <td>75</td> </tr> <tr> <td rowspan="2">Commercial and Office</td> <td>7 am–1 pm</td> <td>65</td> <td>75</td> </tr> <tr> <td>10 pm–7 am</td> <td>60</td> <td>70</td> </tr> <tr> <td rowspan="2">Industrial</td> <td>7 am–10 pm</td> <td>70</td> <td>80</td> </tr> <tr> <td>10 pm–7 am</td> <td>65</td> <td>75</td> </tr> </tbody> </table> <p>Note: dB = decibels</p>				Land Use Designation	Time Period	Noise Level (dB)	Noise Level (dB)	Residential	7 am–10 pm	50	70	10 pm–7 am	55	75	Commercial and Office	7 am–1 pm	65	75	10 pm–7 am	60	70	Industrial	7 am–10 pm	70	80	10 pm–7 am	65	75	The County (Public Works) and Contractor	County to verify that all proposed mechanical equipment is in compliance prior project commencement.  Discuss at preconstruction meeting.	Add a statement to Standard Specifications.  Verify equipment compliance prior to start of work and each workday.	Compliance with construction noise limitations. <ul style="list-style-type: none"> <li>Noise throughout construction activities is minimized using BMPs and minimization measures outlined in construction bid documents.</li> </ul>
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<b>Section 3.2.20 - Wildfires</b>																																
<p><b>MM HAZ-5: Wildfire Potential:</b> Mitigation measure MM HAZ-5 Wildland Fire described in the Hazards and Hazardous Materials section above will be used to reduce the risk of wildfire associated with project construction to a less-than-significant level.</p>				The County (Public Works) and Contractor	See MM-HAZ-5 above	See MM-HAZ-5 above	See MM-HAZ-5 above																									