



# **MITIGATION MONITORING PROGRAM**

**Sonoma County Permit and Resource Management Department**

2550 Ventura Ave, Santa Rosa, CA 95403  
(707) 565-1900 Fax (707) 565-1103

Pursuant to Section 21081.6 of the Public Resources Code, the mitigation measures listed in this program are to be implemented as part of the project. This program identifies the time at which each mitigation measure is to be implemented and the person(s) responsible. The signature of each responsible person will indicate completion of their portion of the mitigation measure.

**Project:** Wildlife Exclusion Perimeter Fence Project

**Project Applicant:** Sonoma County Department of Public Infrastructure- Airport Division

**Location:**

**Lead Agency:** Sonoma County

**Decision Making Body:** Board of Supervisors

**P.P.R #**

**Date Approved:** June 6, 2023

**SCH #** 2023010070

**Contact Person(s):** Jackson Ford

## **Time of Implementation**

- Design:** The mitigation measure will be incorporated into the project design and/or included in the plans and contract special provisions prior to awarding a construction contract.
- Pre-Construction:** The mitigation measure will be implemented before construction begins.
- Construction:** The mitigation measure will be implemented during construction.
- Post-Construction:** The mitigation measure will be implemented after project construction.

## **Responsible Persons**

The Permit and Resource Management Department will designate an Environmental Specialist. The Department of Transportation and Public Works will designate a Design Engineer and a Construction Engineer.

The Environmental Specialist will certify that a review of the project and plans and specifications was made with the Design Engineer prior to advertising for construction bids or otherwise initiating project construction. The Design Engineer will identify how each mitigation measure has been incorporated into the project. The Construction Engineer (or other person identified in the program) will certify that the mitigation measure has been implemented.

## **Environmental Record**

Before the construction contract is awarded, the Design Engineer will forward the mitigation monitoring program to the Construction Engineer, with a copy to the Environmental Specialist. At completion of construction the Construction Engineer will return the original signed mitigation monitoring program to the Environmental Specialist for filing.

## RECORD OF COMPLIANCE

The Environmental Specialist has reviewed the project design, and plans and specifications with the Design Engineer to assure that the responsibility for completion of the mitigation measures has been assigned and plans and specifications incorporate the appropriate mitigation measures.

Environmental Specialist \_\_\_\_\_ date \_\_\_\_\_

**BIO- Special Status Plants.**

The following measures shall be implemented to reduce potential impacts to special status plants:

The Project shall submit to CDFW two years of completed botanical surveys and associated reports and obtain CDFW's written approval of the reports prior to initiation of Project activities. The botanical surveys and reports shall follow CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities and the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain. If CDFW is unable to accept the survey results, the Project shall conduct additional surveys prior to initiation of Project activities or may assume presence of Sebastopol meadowfoam, Burke's goldfields, Sonoma sunshine, and many-flowered navarretia. Surveys should be completed in conformance with CDFW's 2018 Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities and the Santa Rosa Plain Conservation Strategy, Appendix D: Guidelines for Conducting and Reporting Botanical Inventories for Federally Listed Plants on the Santa Rosa Plain, including, but not limited to, conducting surveys during appropriate conditions, utilizing appropriate reference sites, and evaluating all direct and indirect impacts, such as altering off-site hydrological conditions where these species may be present. Surveys conducted during drought conditions may not be acceptable. If the botanical surveys result in the detection of CESA listed plants that may be impacted by the Project, including Sebastopol meadowfoam, Burke's goldfields, Sonoma sunshine, and many-flowered navarretia, or the presence of these species is assumed, the Project shall obtain a CESA ITP from CDFW prior to construction and comply with all requirements of the ITP. If other special-status plants are detected and would be impacted, the Project shall prepare and implement a mitigation plan approved in writing by CDFW that includes restoration or compensatory habitat at a minimum 3:1 mitigation to impact ratio, unless otherwise approved in writing by CDFW.

Impacts to suitable habitat for federally listed plant species shall be mitigated according to the 2020 USFWS programmatic Biological Opinion for projects on the Santa Rosa Plain, which requires a 1:5:1 ratio for mitigation within the same core area as the impact, and a 3:1 ratio if within a different core area, unless stated otherwise.

The Santa Rosa Plain Conservation Strategy (Conservation Strategy) and Programmatic Biological Option (PBO) provide standard avoidance and minimization measures for projects that affect CTS habitat. As indicated in the BA, the Conservation Strategy and PBO, CTS habitat measures were considered and adapted to the site-specific conditions at the Airport.

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Time of Implementation: Design, Pre-Construction, Construction

Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement)

County forces/ Contracted Specialist

Other (specify)

Design/ Construction Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

**BIO- California Tiger Salamander (*Ambystoma californiense*) (CTS)**

Although it is highly improbable that CTS actually occur at the Airport, the following CTS avoidance and minimization measures will be implemented:

- **Qualified Biologist.** A USFWS-approved qualified biologist shall monitor the initial phases of construction work (vegetation clearing) and shall have the authority to halt construction work as needed to ensure compliance with the measures contained herein. Only qualified biologists shall be allowed to handle CTS.
- **Equipment Maintenance.** All equipment shall be maintained such that there shall be no leaks of automotive fluids such as gasoline, oils, or solvents. Hazardous materials such as fuels, oils, solvents, etc., shall be stored in sealable containers in a designated location that is at least 200 feet from aquatic habitats. All fueling and maintenance of vehicles and other equipment and staging areas shall be located at least 200 feet from any aquatic habitat.
- **Construction Timing.** Grading and clearing work shall be conducted between May 15 and October 15, of any given year, depending on the level of rainfall and site conditions.
- **Revegetation.** Project areas temporarily disturbed by construction activities shall be re-vegetated with an erosion control seed mix containing grassland species native to the Santa Rosa Plain.
- **As compensation for permanent adverse effects to 0.85 acre of designated Critical Habitat for CTS, the County of Sonoma shall acquire 0.17 acre of CTS mitigation credits from a USFWS-approved off-site mitigation or conservation bank on the Santa Rosa Plain, resulting in an overall mitigation ratio of 0.2:1.**

CTS habitat temporarily disturbed by vegetation removal (mowing) is expected to recover within one growing season, and therefore does not require mitigation.

Time of Implementation: Design, Pre-Construction, Construction

Method: Incorporated into the project design

X Included in the project plans and specifications (contractor will implement)

X County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

<p><b>BIO- Pappose tarplant (<i>Centromadia parryi</i> ssp. <i>parryi</i>)</b></p> <p>A survey for pappose tarplant will be conducted during the species' flowering period (May – October) prior to year in which construction is scheduled. Following seed-set in the late summer/early fall (September – November) of that year, seeds shall be collected from stands of pappose tarplant within the study area. The harvested seeds shall be properly stored and shall be used to re-establish one or more new stands of tarplant at the Airport.</p>
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Time of Implementation: Design, Pre-Construction, Construction

Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement)

County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

### **BIO- Western Pond Turtle (*Actinemys marmorata*)**

Prior to the commencement of any vegetation removal in the vicinity of Airport Creek, the following measures shall be implemented:

- **Pre-construction Surveys.** The Project Biologist shall survey the ponds and the creek habitat and any uplands that would be affected by construction work within 300 feet of the ponds and creek. This survey shall occur within two days of the onset of construction activities. If any pond turtles are encountered during the surveys, construction work may not commence in the vicinity until the Project Biologist has relocated the pond turtle to nearby suitable, undisturbed aquatic habitat. The Project Biologist shall determine the best location for their release, based on the condition of the vegetation, soil, and other habitat features and the proximity to human activities.
- **Daily Surveys.** A designated construction monitor<sup>1</sup> shall conduct daily surveys when work is being done in the vicinity of Airport Creek. If any western pond turtles are observed during the daily surveys, construction work shall cease until the Project Biologist has been notified and has relocated the turtles to nearby suitable, undisturbed habitat. The Project Biologist shall remain on call and be available, as needed, to relocate any western pond turtles discovered by the designated monitor during construction.
- **Proper Field Practices.** To ensure that diseases are not conveyed between work sites by the Project Biologist or his or her assistants, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force<sup>2</sup> shall be followed at all times.
- **If western pond turtle or their nest are detected at any time** CDFW shall be notified immediately, and the qualified Biologist shall relocate the turtle to appropriate habitat within the stream it was found. A Western Pond Turtle Habitat Improvement Plan shall be prepared and implemented if western pond turtle or their nests are found and, If required, the plan shall be approved by CDFW.

Time of Implementation: Design, Pre-Construction, Construction

<sup>1</sup> A designated construction monitor shall be one or more supervisory construction personnel who are trained by the Project Biologist to verify compliance with all biological avoidance and minimization measures.

<sup>2</sup> U.S. Fish and Wildlife Service. 2011. *Declining Amphibian Task Force Code of Practices*. Ventura Fish and Wildlife Office – Survey Protocols and Guidelines, available at: <http://fws.gov/ventura/docs/species/protocols/DAFTA.pdf>. Accessed May 4, 2020.

Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement) **or**

County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

### **BIO- Burrowing Owl (*Athene cunicularia*)**

The following measures shall be implemented to mitigate the impacts associated with the loss of occupied burrowing owl habitat:

A qualified biologist shall conduct a habitat assessment for wintering burrowing owl, and surveys if habitat is present. The qualified biologist shall follow the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report) habitat assessment and survey methodology prior to Project activities occurring during the burrowing owl wintering season from September 1 to January 31. The habitat assessment and surveys shall encompass a sufficient buffer zone to detect owls nearby that may be impacted, which shall be a minimum of 1,640 feet unless otherwise approved in writing by CDFW. Surveys shall include four non-breeding season surveys spread evenly throughout the non-breeding season pursuant to the CDFW 2012 Staff Report. Time lapses between surveys or project activities shall trigger subsequent surveys, as determined by a qualified biologist, including, but not limited to, a final survey within 24 hours prior to ground disturbance and before construction equipment mobilizes to the Project area. The qualified biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology resulting in detections.

Burrowing owls shall be avoided pursuant to the buffer zone prescribed in the CDFW 2012 Staff Report, unless otherwise approved in writing by CDFW, and any eviction plan shall be subject to CDFW review. Eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) is not a mitigation measure; therefore, off-site habitat compensation shall be included in any eviction plan. Habitat compensation acreages shall be approved by CDFW, as the amount depends on site-specific conditions and completed before Project construction unless otherwise approved in writing by CDFW. Off-site mitigation shall also include placement of a conservation easement and preparation and implementation of a long-term management plan prior to Project construction.

**Non-standard Buffer Zones.** Construction buffers may be reduced from the distances provided above if a site-specific analysis prepared by the Project Biologist indicates that the nesting pair(s) or wintering owl(s) would not be adversely affected by construction activities. CDFW must approve this analysis before non-standard buffers may be utilized. If a smaller buffer is approved by CDFW, the qualified biologist shall conduct monitoring for a minimum of 10 consecutive days following the initiation of construction to verify that the nesting pair does not exhibit an adverse reaction to construction activities (e.g., changes in behavioral patterns, reactions to noise), and to verify that the burrows are not in danger of collapse due to equipment traffic. Monitoring shall continue at least once a week through the nesting/wintering cycle at that site to verify that no change in behavior by the owls occurs.

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Time of Implementation: Design, Pre-Construction, Construction

- Method:            Incorporated into the project design
- Included in the project plans and specifications (contractor will implement)
  - County forces/ Contracted Specialist
  - Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

**BIO-White-tailed kite (*Elanus leucurus*), Yellow warbler (*Dendroica petechia brewsteri*), Grasshopper Sparrow (*Ammodramus savannarum*), and other nesting and/or migratory birds**

The following mitigation measures will be implemented to reduce impacts to nesting and/or other migratory birds:

If construction, grading, vegetation removal, or other project-related activities are scheduled during the nesting season, January 1 to August 31, a focused survey for active nests shall be conducted by a Qualified Biologist within 5 days prior to the beginning of project-related activities. The survey shall consist of the entire project limits; as well as a minimum 500-foot buffer. If a lapse in project-related work of 5 days or longer occurs, another focused survey shall be required before project work can be reinitiated. If an active nest is found during surveys, qualified biologist shall establish site- and species-specific no-work buffers. The buffer distances shall be specified to protect the bird's normal behavior to prevent nesting failure or abandonment. The buffer distance recommendation shall be developed after field investigations that evaluate the bird(s) apparent distress in the presence of people or equipment at various distances. Abnormal nesting behaviors which may cause reproductive harm include, but are not limited to, defensive flights/vocalizations directed towards project personnel, standing up from a brooding position, and flying away from the nest. The qualified biologist shall have authority to order the cessation of all nearby Project activities if the nesting birds exhibit abnormal behavior which may cause reproductive failure (nest abandonment and loss of eggs and/or young) until an appropriate buffer is established.

The qualified biologist shall monitor the behavior of the birds (adults and young, when present) at the nest site to ensure that they are not disturbed by project work. Nest monitoring shall continue during project work until the young have fully fledged (have completely left the nest site and are no longer being fed by the parents), as determined by the qualified biologist, unless otherwise approved in writing by CDFW.

Time of Implementation: Design, Pre-Construction, Construction

- Method:
- Incorporated into the project design
  - Included in the project plans and specifications (contractor will implement)
  - County forces/ Contracted Specialist
  - Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

### **BIO- Riparian Restoration Plan**

Temporarily impacted areas within the riparian zone or other sensitive natural community shall be restored and planted with native trees, shrubs and grasses. Permanently impacted areas within stream habitat including the riparian zone shall be restored at a 3:1 mitigation to impact ratio for acreage and linear feet impacted. Restoration shall occur on-site to the extent feasible. If off-site restoration is necessary, it shall be as close the Project site as possible and within the same watershed, unless otherwise approved in writing by CDFW. Restoration shall occur in the same year of the impacts. Trees within the riparian zone shall be replaced at the following mitigation to impact ratios, unless otherwise approved in writing by CDFW.

Oak (*Quercus* sp.) trees:

- 4:1 replacement for trees up to 7 inches diameter at breast height (DBH)
- 5:1 replacement for trees greater than 7 inches and up to 15 inches DBH
- 10:1 replacement for trees greater than 15 inches DBH, which are considered old-growth oaks

Non-oak trees:

- 1:1 replacement for non-native trees
- 1:1 replacement for native trees up to 3 inches DBH
- 3:1 replacement for trees greater than 3 inches DBH and up to 6 inches DBH
- 6:1 replacement for trees greater than 6 inches DBH

Alternatively, appropriate credits from a conservation bank may be purchased at a 3:1 ratio with written approval from CDFW.

Time of Implementation: Design, Construction, Post-Construction

Method: Incorporated into the project design

X Included in the project plans and specifications (contractor will implement)

X County forces/ Contracted Specialist

X Other (specify) County to hire a revegetation specialist to implement planting

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

<p><b>BIO- Lake and Streambed Alteration Agreement</b></p> <p>Prior to commencement of construction, the Project shall notify CDFW for potential impacts to streams and obtain an LSA Agreement if required by CDFW. The notification should be submitted online via the Environmental Permit Information Management System (EPIMS) at <a href="https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS">https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS</a>. The Project shall comply with all measures of an LSA Agreement if issued. If any wetlands hydrologically connected to the stated creeks will be impacted, such impacts will be included within the notification.</p>
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Time of Implementation: Design, Pre-Construction, Construction

Method: Incorporated into the project design

X Included in the project plans and specifications (contractor will implement)

X County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

**BIO- Wetlands**

The wetlands within the study area were mapped in compliance with the United States Army Corps of Engineers (USACE) Wetland Delineation Manual. Permanent and temporary impacts to wetland function were considered.

The Proposed Project would result in the filling of 0.0004 acre (16.29 square feet) of potential CWA jurisdictional wetlands identified as seasonal wetlands. The filling would occur as a result of installing anchors along the fence line and rebar reinforcements to the fence fabric at drainage crossings. The Proposed Project would also result in the loss of 0.0000005 acre (0.020 square feet) of potential jurisdictional creek due to the installation of rebar to exclude deer from the creek corridor.

Temporary impacts would occur to 0.570 acre of potential jurisdictional seasonal wetlands. The permanent impacts to potentially jurisdictional seasonal wetlands and creek are less than 21 square feet and are, consequently, considered to be de minimis (i.e., less than 1/10 of an acre), and do not warrant the need for compensatory mitigation. Impacts to wetlands would be less than significant.

Time of Implementation: Design, Pre-Construction, Construction

Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement)

County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

**BIO- Wildlife Hazard Assessment (WHA) and a Wildlife Hazard Management Plan (WHMP).**

Pursuant to 14 CFR §139.337, the Airport Sponsor prepared a Wildlife Hazard Assessment (WHA) and a Wildlife Hazard Management Plan (WHMP). One of the primary recommendations of the WHMP is that existing gaps in the perimeter fence that allow wildlife to enter the Airport be closed. The Proposed Project was developed in order to satisfy this recommendation of the WHMP.

The Conservation Strategy, PBO, and Santa Rosa Plain Recovery Plan were developed jointly by the USFWS; USACE; CDFW; USEPA; North Coast Regional Water Quality Control Board (NCRWQCB); Sonoma County; and various local municipalities, organizations, and landowner representatives, to create a long-term conservation plan to mitigate for the potential adverse effects of future development on federally listed plants and animals in the Santa Rosa Plain. The Conservation Strategy protects and contributes to the recovery of Burke's goldfields, Sonoma sunshine, Sebastopol meadow foam, many-flowered navarretia, and CTS, and provides the biological framework upon which the PBO is based.

Projects that require USACE permit approval (such as the Proposed Project) can be appended to the PBO, and thereby provided individual take authorization, if the projects apply the PBO's mitigation ratios and adhere to all applicable avoidance and minimization measures in the PBO. The PBO potentially allows appendage of projects on the Santa Rosa Plain that may adversely impact CTS; CTS Critical Habitat; or suitable habitat for Burke's goldfields, Sebastopol meadowfoam, or Sonoma sunshine. Projects anticipated to have adverse impacts to California Natural Diversity Database (CNDDDB) known occurrences of Burke's goldfields, Sebastopol meadowfoam, or Sonoma sunshine cannot be appended to the PBO. The Conservation Strategy identifies eight conservation areas for listed plants and CTS, one listed plant and CTS preserve system, and one listed plant conservation area. Conservation areas are lands where recovery and mitigation efforts should be directed to best protect and expand populations of the listed species. The Conservation Strategy also encourages the establishment of preserves within these areas; translocation of listed species; habitat improvement through wetland creation, restoration, and enhancement; and mitigation measures to reduce and compensate for effects. Projects in the Santa Rosa Plain that potentially affect these federally listed species should evaluate those effects and implement mitigation measures based on recommendations in the Conservation Strategy.

Under the Conservation Strategy, a large portion of the undeveloped parts of the Airport falls within the "Windsor Listed Plant Conservation Area". All of the Airport

is located within an area described as "Potential for Presence of California Tiger Salamander and Listed Plants." The Conservation Strategy and the associated PBO contain various guidelines and objectives applicable to these two areas.

Conservation Strategy - "Potential for Presence of California Tiger Salamander and Listed Plants"

Within this area, non-hardscaped lands are considered to be suitable habitat for CTS; the species cannot be assumed to be absent from a site unless protocol-level trapping surveys have demonstrated their absence. Protocol-level surveys have not been conducted at the Airport due to the impracticability of conducting such surveys within an operationally active Airport site. Therefore, the BA prepared for the Proposed Project recognizes all non-hardscaped lands within the Airport as suitable CTS habitat. As such, impacts for the permanent disturbance of these non-hardscaped lands should be mitigated in accordance with the Conservation Strategy and the associated PBO. With the mitigation measures listed under the response to "a" above, the impacts related to the Conservation Strategy would be less than significant.

Vernal pools and other seasonal wetlands within this mapped area are considered suitable habitat for three federally listed plant species (Sonoma sunshine, Burke's goldfields, and Sebastopol meadowfoam). Under the Conservation Strategy and the PBO, all such wetland features must also be considered occupied habitat for these species unless protocol-level botanical surveys have demonstrated their absence. Protocol-level botanical surveys have been conducted at the Airport and the locations of all occupied habitat have been mapped. Consistent with the Conservation Strategy, the Proposed Project will avoid affecting all occupied habitat; effects are limited to suitable habitat. Impacts to all suitable habitats should be mitigated in accordance with the Conservation Strategy and the associated PBO. However, wetland impacts resulting from the Proposed Action would permanently impact an insignificant amount of habitat (0.0004 acre/16.29 square feet) and are considered de minimis, not requiring compensatory mitigation.

Conservation Strategy – "Windsor Plant Conservation Area"

Under Objective No. 2 of the Conservation Strategy, the following objectives are listed for the Windsor Plant Conservation Area:

Establish 75 to 150 acres of plant preserves of 25 to 100 acres each in the Windsor Plant Conservation Area.

Maintain at least 10 occurrences of both Sonoma sunshine and Burke's goldfields throughout their known range on the Santa Rosa Plain.

Preserve the one known population of many-flowered navarretia on the Santa Rosa Plain.

The Proposed Project is consistent with Objectives 1 and 2. The Airport previously established and placed under permanent protection and management three preserves, encompassing approximately 41 acres within which Burke's goldfields populations occur: (1) the Goldfields Preserve, (2) the Runway 14-32 Preserve, and (3) the Sonoma County Airport Consolidated Mitigation Area (SACMA) Preserve. These preserves are identified in the Conservation Strategy as components of the overall "Windsor Plant Conservation Area" which encompasses Airport lands and seeks to protect an adequate distribution and size of listed plant populations throughout the area. The Proposed Project would fully avoid any temporary or permanent effects to these three preserves.

The Proposed Action is also consistent with Objective No. 3. The one known occurrence of many-flowered navarretia is found within parcels to the northwest of the current Airport boundaries and would not be affected by the Proposed Project.

#### Wetland Mitigation Requirements under the Conservation Strategy

Section 5.3.1 of the Conservation Strategy states that vernal pools and seasonal wetlands on the Santa Rosa Plain should be replaced at a minimum ratio of 1:1; higher ratios may be needed depending on the quality of the wetland that is impacted. However, wetland impacts resulting from the Proposed Project would permanently impact an insignificant amount of habitat (0.0004 acre/16.29 square feet) and are considered de minimis, not requiring compensatory mitigation.

Time of Implementation: Design, Pre-Construction

Method:       X Incorporated into the project design  
                  X Included in the project plans and specifications (contractor will implement)  
                  County forces  
                  Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

## **CUL- Ground Disturbance**

Construction of the Proposed Project would involve ground-disturbing activities including excavation for new fence posts to a depth of approximately 3.5 feet. Additionally, grading would be required for maintenance road locations and fence locations within the APE. Evaluation of the APE identified no archeological sites on or eligible for listing on the NRHP and the limited ground disturbance is unlikely to affect archaeological historic properties. The Airport has been heavily disturbed as part of previous Airport-related development. However, because the Proposed Project would include excavation, previously unrecorded archaeological resources may be uncovered during construction. If any previously unrecorded archaeological resource were identified during ground-disturbing construction activities and were found to qualify as an historical resource, per CEQA Guidelines § 15064.5, or a unique archaeological resource, as defined in Public Resources Code (PRC) § 21083.2(g), any impacts to the resource resulting from the Proposed Project could be potentially significant. Any such potential significant impacts would be reduced to a less than significant level by implementing the following mitigation measures:

- The project specifications shall require the contractor to comply with the following measures regarding the discovery of cultural resources, including Native American Tribal Cultural Resources and items of historical and archaeological interest. The County's Construction Inspector and construction personnel will be notified of the possibility of encountering cultural resources during project construction.
- The County shall notify the Tribal Historic Preservation Officers (THPOs) of the Federated Indians of Graton Rancheria (Native American Tribes) in writing at least five days prior to the start of the project's ground-disturbing activities that work will commence.
- Prior to initiation of ground-disturbing activities, the County shall arrange for construction personnel to receive training about the kinds of cultural materials that could be present at the project sites and protocols to be followed should any such materials be uncovered during construction. An archaeologist who meets the U.S. Secretary of Interior's professional standards (48 CFR Parts 44738-44739 and Appendix A to 36 CFR 61) shall provide appropriate archaeological training, including the purpose of the training to increase awareness and appropriate protocols in the event of an inadvertent discovery.
- The project specifications will provide that if discovery is made of items of historical, archaeological, or cultural interest, the contractor will immediately cease all work activities in the area of discovery. Historical, archaeological,

	<p>and cultural indicators may include, but are not limited to, dwelling sites, locally darkened soils, stone implements or other artifacts, fragments of glass or ceramics, animal bones, and human bones. After cessation of excavation, the contractor will immediately contact the County's Construction Inspector and the THPOs. The contractor will not resume work until authorization is received from the Construction Inspector.</p> <p>Should an archaeological deposit be encountered during ground disturbance in the APE, all ground-disturbing activities within 25 feet shall be stopped. The Airport shall notify the FAA to initiate consultation regarding treatment of the discovery, and a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for Archeology contacted to assess the situation and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the NRHP) and an adverse effect would occur, the FAA in consultation with the SHPO shall identify appropriate treatments for the discovery.</p>
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Time of Implementation: Design, Pre-Construction, Construction

Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement)

County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

### **CUL- Human Remains**

The Proposed Project is unlikely to disturb any human remains, including those interred outside of formal cemeteries, due to the limited depth of excavation and the previously disturbed state of the study area. However, because the Proposed Project would include excavation, previously unrecorded human remains may be uncovered during construction. If any previously unknown human remains were encountered during ground-disturbing construction activities, any impacts to the human remains resulting from the Proposed Project could be potentially significant. Any such potential significant impacts would be reduced to a less than significant level by implementing the mitigation measure:

- In the event that human remains are identified during project construction, these remains must be treated in accordance with Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code, as appropriate.
- Section 7050.5 of the California Health and Safety Code states that, in the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the remains are discovered has determined whether or not the remains are subject to the coroner's authority. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission (NAHC) within 24 hours of this identification. The NAHC will identify a Native American Most Likely Descendent (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

Section 5097.98 of the Public Resources Code states that the NAHC, upon notification of the discovery of Native American human remains pursuant to Health and Safety Code Section 7050.5, shall immediately notify those persons (i.e., the MLD) it believes to be descended from the deceased. With permission of the landowner or a designated representative, the MLD may inspect the remains and any associated cultural materials and make recommendations for treatment or disposition of the remains and associated grave goods. The MLD shall provide recommendations or preferences for treatment of the remains and associated cultural materials within 48 hours of being granted access to the site.

Time of Implementation: Design, Construction  
Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement)

County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

**Tribal CUL- Ground Disturbance**

As documented in the cultural resources report prepared for the Proposed Project and summarized in Section V. Cultural Resources, evaluation of the APE identified no historic, architectural, archeological, and cultural properties on or eligible for listing on the NRHP and the limited ground disturbance is unlikely to affect archaeological historic properties. If unknown archaeological resources are uncovered during construction, the mitigation measure described under Section V. Cultural Resources, response (b), would ensure that the impacts are reduced to a less than significant level.

Time of Implementation: Design, Construction

Method: Incorporated into the project design

Included in the project plans and specifications (contractor will implement)

X County forces/ Contracted Specialist

Other (specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

<b>Tribal CUL- Human Remains</b>
As discussed in Section V, Cultural Resources, the Proposed Project would occur within previously disturbed portions of the Airport and, with the mitigation measures in place in the case of accidental discovery, does not have the potential to cause significant impacts to archaeological resources or human remains.

Time of Implementation: Design, Construction

Method: Incorporated into the project design

X Included in the project plans and specifications (contractor will implement)

X County forces/ Contracted Specialist

Other

(specify)

Construction/ Design Engineer certifies that this mitigation measure was implemented and monitored during construction.

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*Comments:*

