

Mitigation Measure Comparison for the Central Valley Flood Protection Plan

This table presents a “crosswalk” between Delta Plan mitigation measures and the Central Valley Flood Protection Plan’s (CVFPP’s) program-level mitigation measures, which demonstrates compliance with or effective substitution for, the Delta Plan mitigation measures. Included below are mitigation measures from the 2012 CVFPP Program Environmental Impact Report (PEIR), the 2017 CVFPP Update Supplemental PEIR; and the 2022 CVFPP PEIR addendum. Descriptions are included where the CVFPP identified potentially significant impact or significant impacts and proposed mitigation measures to reduce those impacts.

The California Department of Water Resources (DWR) and/or the Central Valley Flood Protection Board (Board) may be the lead and/or responsible agencies for future projects contemplated by the CVFPP. However, for some future projects, neither DWR nor the Board will be a lead or responsible agency. Accordingly, the CVFPP’s Mitigation Monitoring and Reporting Plan (MMRP) focuses on those management actions within the discretionary responsibility of DWR or the Board. At a program level, the MMRP provides a list of options of mitigation measures and strategies to address the CVFPP’s significant and potentially significant impacts on environmental resources. Project-level activities will undergo future environmental analysis as applicable under CEQA. As part of these future environmental reviews, the lead agency for specific projects will consider the mitigation measures and strategies identified in the PEIR and Supplemental PEIR as starting points to determine their applicability to a specific project, and to consider developing additional mitigation measures for significant adverse impacts identified in the project-specific environmental analysis. Because all the potential actions, impacts, and mitigation measures for future projects cannot be anticipated at a program level, each project may require specific strategies applicable to the impacts associated with the specific location and type of action. It is anticipated that a project-level MMRP will be developed as part of each future project-level environmental analysis.

Supporting documents have been uploaded in support of this submittal of Certification of Consistency and are referenced in this document (Step 2.J. Supporting Documents). The four primary supporting documents are as follows:

- 2012 Central Valley Flood Protection Plan Consolidated Final Program Environmental Impact Report (2012 CVFPP PEIR, DWR 2012)
- Central Valley Flood Protection Plan Final Supplemental Program Environmental Impact Report (2017 CVFPP Update Supplemental PEIR, DWR 2017)
- Central Valley Flood Protection Plan Program Environmental Impact Report Addendum (2022 CVFPP Update Addendum No. 1, DWR 2022)
- Errata to CVFPP Update Addendum No. 1 (DWR 2022)

Other supporting documents are available from the California Department of Water Resources (DWR) website at <https://water.ca.gov/Programs/Flood-Management/Flood-Planning-and-Studies/Central-Valley-Flood-Protection-Plan>. These documents include:

- 2017 CVFPP Update
- 2016 CVFPP Conservation Strategy
- 2022 CVFPP Update
- 2022 CVFPP Conservation Strategy Update

Aesthetics

Delta Plan Mitigation Measure 5.2-1

Use non-specular conductors for transmission lines and distribution lines to reduce glare.

CVFPP Consistency

Not Applicable.

The CVFPP does not include any new transmission or distribution lines.

Water Resources

Delta Plan Mitigation Measure 3-1

1. For construction of new facilities, all typical construction mitigation measures shall be required. Typical mitigation measures include the following construction-related Best Management Practices (BMPs):
 - Gravel bags, silt fences, etc., shall be placed along the edge of all work areas in order to contain particulates prior to contact with receiving waters.
 - All concrete washing and spoils dumping shall occur in a designated location.
 - Construction stockpiles shall be covered in order to prevent blowoff or runoff during weather events.
 - Severe weather event erosion control materials and devices shall be stored onsite for use as needed.
 - Soil stabilization, sediment control, wind erosion control, tracking control, non-storm water management, and waste management/materials pollution control
2. Apply other BMPs as determined necessary by the regulating entity (city, county).
3. Any new facility with introduced impervious surfaces shall include stormwater control measures that are consistent with the Regional Water Quality Control Board (RWQCB) National Pollutant Discharge Elimination System (NPDES) municipal stormwater runoff requirements. The stormwater control measures shall be designed and implemented to reduce the discharge of stormwater pollutants to the maximum extent practical. Stormwater controls such as bioretention facilities, flow-through planters, detention basins, vegetative swales, covering pollutant sources, oil/water separators, and retention ponds shall be designed to control stormwater quality to the maximum extent practical.
4. Mitigate sediment contaminant bioavailability impacts through (a) the exclusion of bird use or nesting areas from areas that may have excessive selenium or mercury; (b) minimization of methylmercury

production; and/or (c) maximization of contaminant degradation before discharge of water, as appropriate.

For any construction activities with the potential to cause in-river sediment disturbance associated with construction:

5. Apply BMPs to avoid or reduce temporary increases in suspended sediment. These BMPs for in-channel construction and levee disturbance may include, but are not limited to, silt curtains, cofferdams, the use of environmental dredges, erosion control on all inward levee slopes, and various levee-stabilization techniques, including revegetation. All construction sites will include preparation of a Storm Water Pollution Prevention Plan and BMPs designed to capture spills and prevent erosion to the waterbody. Turbidity shall be monitored up- and downstream of construction sites as a measure of impact.
6. Apply bank stabilization BMPs, as needed, for any in-channel disturbance, such as:
 - A 100-foot vegetative or engineered buffer shall be maintained between the construction zone and surface water body.

Native and annual grasses or other vegetative cover shall be established on construction sites immediately upon completion of work causing disturbance, to reduce the potential for erosion close to a waterway or water body.

CVFPP Consistency

Consistent.

As a planning document, the CVFPP describes mitigation measures that could be implemented by project proponents. The mitigation measures that are consistent with this Delta Plan mitigation measure are found in Sections 3.12, 3.13, and 3.21 of the 2012 CVFPP PEIR, on pages 3.13-18 and 3.21-43. These measures include:

- Mitigation Measure HYD-1 (NTMA and LTMA): *Identify and Implement Measures to Minimize Downstream Erosion and Siltation*
- Mitigation Measure SWQ-3 (NTMA and LTMA): *Conduct and Comply with Phase I Environmental Site Assessments*
- Mitigation Measure GRW-5a (LTMA): *Develop and Implement Groundwater Management Plans or Expand Existing Groundwater Management Plans, Including Defining Basin Management Objectives, Groundwater Monitoring Plans, and Conditions under Which Corrective Actions Are Taken.*
- Mitigation Measure HHM-2 (NTMA and LTMA): *Conduct a Site-Specific Analysis to Determine the Proximity of School Sites, Notify and Consult with Affected Schools, and Implement Storm Water Pollution Prevention Plan and Best Management Practices as Required.*

These mitigation measures could require project proponents to perform an analysis of the new facilities to determine whether the facility will experience or cause elsewhere a downstream erosion or siltation problem. To the extent possible, new facilities may be designed to avoid or minimize these effects. Project proponents may also conduct Phase I Environmental Site Assessments to address potential

hazards related to areas which were not previously inundated and develop or expand formalized groundwater management plans to guide management of groundwater basins where managed groundwater recharge and/or groundwater banking projects are to occur.

Delta Plan Mitigation Measure 3-2

Prior to construction, a survey should be made of all wells located adjacent to the construction site to determine location and depths of the wells and the groundwater surface. During construction of any project that requires dewatering of groundwater, monitoring wells should be installed adjacent to the groundwater dewatering wells or pumps. If the adjacent groundwater declines in a manner that would adversely affect adjacent wells following implementation of dewatering, the dewatering operations should be halted until the following measures are implemented:

- Install sheet piles to reduce the area influenced by shallow groundwater level declines.
- In case sheet piles are not an option and domestic well yields are affected, water supplies shall be trucked in to satisfy the well user's water supply needs.
- If sheet piles are not effective and the impact on the well yield is important, such that the trucking in of water is not economically feasible, the affected well shall be deepened. Another option for a well that is deep enough would be to lower the pump bowl such that deepened water can be pumped out of the well. If these two options are not feasible, a new, deeper, replacement well shall be installed for groundwater production.

CVFPP Consistency

Not Applicable.

The PEIR did not find a significant impact related to modification of groundwater flows. The CVFPP does not include dewatering activities that could impact adjacent groundwater wells. Therefore, the CVFPP does not include comparable mitigation measures.

Biological Resources

Delta Plan Mitigation Measure 4-1

1. Avoid, minimize, and compensate for reduction in area and/or habitat quality of sensitive natural communities, including wetlands, by doing the following:

- Selecting project site(s) that would avoid sensitive natural communities, including jurisdictional wetlands and other waters, vernal pools, alkali seasonal wetlands, riparian habitats, and inland dune scrub.
- Design, to the extent practicable, project elements to avoid effects on sensitive natural communities.
- Replacing, restoring, or enhancing on a "no net loss" basis (in accordance with U.S. Army Corps of Engineers (USACE) and State Water Resources Control Board (SWRCB) requirements), wetlands and other waters of the United States and waters of the State that would be removed, lost, and/or degraded.
- Where impacts to sensitive natural communities other than waters of the United States or State are unavoidable, compensating for impacts by restoring and/or preserving in-kind sensitive

natural communities on-site, or off-site at a nearby site, or by purchasing in-kind restoration or preservation credits from a mitigation bank that services the project site and that is approved by the appropriate agencies, in consultation with applicable regulatory agencies (at ratios that offset temporal loss of habitat value).

2. Implement advanced mitigation planning for ecosystem restoration prior to construction.
3. Implement construction best management practices, including:
 - Developing and implementing a Stormwater Pollution Prevention Plan (SWPPP).
 - Minimizing soil disturbance, erosion, and sediment runoff from project site.
 - Avoiding and minimizing contaminant spills.
 - Minimizing visual and noise disturbance from construction activities.
 - Conducting biological construction monitoring to ensure that implemented BMPs are effective.
4. Restore areas temporarily affected by construction activities, including:
 - Preparing restoration plan for temporary impacts sites for review by resource agencies.
 - Minimizing soil disturbance and stockpiling topsoil for later use in any areas to be graded.
 - Decompacting or amending soil, if necessary, before planting and use native species for revegetation.
 - Restoring natural communities with similar or improved function from communities that were affected.
5. If a project may result in conversion of oak woodlands, as identified in section 21083.4 of the Public Resources Code, one or more of the following mitigation measures shall be implemented:
 - Conserve oak woodlands, through the use of conservation easements.
 - Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.
 - Contribute funds to the Oak Woodlands Conservation Fund, as established under subdivision (a) of section 1363 of the Fish and Game Code.
6. An invasive species management plan shall be developed and implemented for any project whose construction or operation could lead to introduction or facilitation of invasive species establishment. The plan shall ensure that invasive plant species and populations are kept below preconstruction abundance and distribution levels. The plan shall be based on the best available science and developed in consultation with Department of Fish and Wildlife (DFW) and local experts, such as the University of California Extension, county agricultural commissioners, representatives of County Weed Management Areas (WMA), California Invasive Plant Council, and California Department of Food and Agriculture. The invasive species management plan will include the following elements:
 - Nonnative species eradication methods (if eradication is feasible).
 - Nonnative species management methods.
 - Early detection methods.
 - Notification requirements.
 - Best management practices for preconstruction, construction, and post construction periods.
 - Monitoring, remedial actions and reporting requirements.
 - Provisions for updating the target species list over the lifetime of the project as new invasive species become potential threats to the integrity of the local ecosystems.

CVFPP Consistency

Consistent.

1 through 5: As a planning document, the CVFPP describes mitigation measures that could be implemented by project proponents. The mitigation measures that are consistent with this Delta Plan mitigation measure are found in Sections 3.5 and 3.6 of the 2012 CVFPP PEIR along with all updates to mitigation measures included in Section 3.2 and 3.3 of the 2017 CVFPP Update Supplemental PEIR.

These measures include:

- Mitigation Measure BIO-A-2a (NTMA and LTMA): *Secure Applicable State and/or Federal Permits and Implement Permit Requirements* (page 3.5-45)
- Mitigation Measure BIO-A-2b (NTMA and LTMA): *Ensure Full Compensation for Losses of Riparian Habitat Functions and Values Caused by Implementing the Vegetation Management Strategy Along Levees* (page 3.5-46)
- Mitigation Measure BIO-A-3 (NTMA and LTMA): *Inventory and Replace Shaded Riverine Aquatic Habitat* (page 3.5-49)
- Mitigation Measure BIO-A-4 (NTMA and LTMA): *Conform to NMFS Guidelines for Pile-Driving Activities* (page 3.5-51),
- Mitigation Measure BIO-A-6 (NTMA and LTMA): *Design and Implement Floodplain Habitat to Minimize Stranding* (page 3.5-55)
- Mitigation Measure BIO-T-1a (NTMA and LTMA): *Conduct Biological Resources Surveys to Quantify Sensitive Natural Communities in Project Areas, and Avoid, Minimize, and, Where Appropriate, Compensate for Construction-Related Effects* (page 3.6-74)
- Mitigation Measure BIO-T-1b (NTMA and LTMA): *Minimize Construction-Related Effects on Critical Habitat and Compensate for Unavoidable Adverse Effects* (page 3.6-76)
- Mitigation Measure BIO-T-3a (NTMA and LTMA): *Conduct Focused Surveys for Special-Status Plants and Wildlife, and Avoid Impacts* (page 3.6-79)
- Mitigation Measure BIO-T-3b (NTMA and LTMA): *If Avoiding Construction-Related Effects on Special-Status Plants and Wildlife is Infeasible, Minimize and, Where Appropriate, Compensate for Effects on Special-Status Species and Loss of Habitat* (page 3.6-82)
- Mitigation Measure BIO-T-3c (NTMA and LTMA): *Secure Applicable State and/or Federal Permits and Implement Permit Requirements* (page 3.6-84)

These mitigation measures include guidance that project proponents obtain necessary state and federal permits and comply with all BMPs outlined in these permits, minimize impacts to sensitive natural communities to the extent feasible and where unavoidable impacts remain, compensate for impacts to sensitive natural communities.

6: The CVFPP includes actions to reduce stressors related to invasive species. The PEIR identified the potential for indirect impacts on sensitive natural communities and habitats related to introduction or spread of invasive species and identified a suite of mitigation actions (summarized in the previous paragraph) to address these impacts, including in BIO-T-1a to minimize indirect disturbance of sensitive

communities, habitats, and species to the extent feasible (with consultation with USFWS and CDFW to develop measures).

Delta Plan Mitigation Measure 4-2

1. Select project site(s) that would avoid habitats of special-status species (which may include foraging, sheltering, migration and rearing habitat in addition to breeding or spawning habitat), and to the maximum extent practicable, (re)design project elements to avoid effects on such species.
2. Schedule construction to avoid special-status species' breeding, spawning, or migration locations during the seasons or active periods that these activities occur.
3. Conduct preconstruction surveys (by a qualified biologist) for special-status species in accordance with U.S. Fish and Wildlife Service (USFWS), National Marine Fisheries Service (NMFS) and DFW survey methodologies and appropriate timing to determine presence and locations of any special-status species and their habitat, and avoid, minimize, or compensate for impacts to special-status species in coordination with DFW and USFWS or NMFS.
4. Establish buffers around special-status species habitats to exclude effects of construction activities. The size of the buffer shall be in accordance with USFWS and DFW protocols for the applicable special-status species. If nest tree removal is necessary, remove the tree only after the nest is no longer active, as determined by a qualified biologist.
5. Conduct construction monitoring (by qualified biologist) to ensure effectiveness of avoidance and minimization measures and implement remedial measures if necessary.
6. When appropriate, relocate special-status plant and animal species or their habitats from project sites following USFWS, NMFS, and DFW protocols (e.g., for special-status plant species or elderberry shrubs).
7. Where impacts to special-status species are unavoidable, compensate for impacts by restoring or preserving in-kind suitable habitat on-site, or off-site, or by purchasing restoration or preservation credits (in compliance with the California Endangered Species Act (CESA) and federal Endangered Species Act (ESA) for affected State- or federally-listed species from a mitigation bank that serves the project site and that is approved by the appropriate agencies, in consultation with the appropriate regulatory agencies (at ratios that offset the temporary loss of habitat value).

CVFPP Consistency

Consistent.

- 1: The CVFPP includes NTMAs and LTMAAs that were selected as a portfolio of program-level actions to provide 200-year level of protection for urban and urbanizing areas, up to 100-year level of protection for small communities, rural-agricultural levee repairs, weir and bypass expansions, flood structure modifications and improvements, and ecosystem restoration. Individual project locations and boundaries will be determined on a project-specific basis but ecosystem restoration is a primary consideration.
- 2 through 7: Mitigation measures in the 2012 CVFPP PEIR address avoidance, minimization, and compensation for impacts on special-status species. Specific mitigation measures from the 2012 CVFPP PEIR that comprehensively address these required elements of DPMM 4-2 include:

- Mitigation Measure BIO-T-1a (NTMA and LTMA): *Conduct Biological Resources Surveys to Quantify Sensitive Natural Communities in Project Areas, and Avoid, Minimize, and, Where Appropriate, Compensate for Construction-Related Effects* (page 3.6-74)
- Mitigation Measure BIO-T-3a (NTMA and LTMA): *Conduct Focused Surveys for Special-Status Plants and Wildlife, and Avoid Impacts* (page 3.6-79)
- Mitigation Measure BIO-T-3b (NTMA and LTMA): *If Avoiding Construction-Related Effects on Special-Status Plants and Wildlife is Infeasible, Minimize and, Where Appropriate, Compensate for Effects on Special-Status Species and Loss of Habitat* (page 3.6-82)
- Mitigation Measure BIO-T-3c (NTMA and LTMA): *Secure Applicable State and/or Federal Permits and Implement Permit Requirements* (page 3.6-84)
- Mitigation Measure BIO-A-2b (NTMA): *Ensure Full Compensation for Losses of Riparian Habitat Functions and Values Caused by Implementing the Vegetation Management Strategy Along Levees* (page 3.6-93)
- Mitigation Measure BIO-T-5b (NTMA and LTMA): *Identify Local Plans and Policies and Develop Strategy to Maintain Plan Consistency, Minimize Effects, or Compensate for Construction-Related Effects on Local Plans*

Implementation of these measures could include appropriate surveys, buffers, and compensation for habitat loss as prescribed in Delta Plan Mitigation Measure 4-2, including consultation with USFWS, NMFS, and CDFW.

Delta Plan Mitigation Measure 4-3

1. Select project site(s) that would avoid a substantial reduction in fish and wildlife species habitat.
2. To the maximum extent practicable, design project elements to avoid effects that would lead to a substantial loss of fish and wildlife habitat.
3. Replace, restore, or enhance habitats for fish and wildlife species that would be lost.
4. Where substantial loss of habitat for fish and wildlife species is unavoidable, compensate for impacts by preserving in-kind habitat.

CVFPP Consistency

Consistent.

1: The CVFPP includes NTMAs and LTMA that were selected as a portfolio of actions to provide 200-year level of protection for urban and urbanizing areas, up to 100-year level of protection for small communities, rural-agricultural levee repairs, weir and bypass expansions, flood structure modifications and improvements, and ecosystem restoration. Individual project locations and boundaries will be determined on a project-specific basis but ecosystem restoration is a primary consideration.

2 through 4: Mitigation measures identified in Sections 3.5 and 3.6 of the 2012 CVFPP PEIR comprehensively address these items by describing avoidance measures to lessen impacts to fish and wildlife habitat, restore or replace impacted fish and wildlife habitat, and where necessary, compensate for impacted habitat.

- Mitigation Measure BIO-A-2b (NTMA & LTMA): *Ensure Full Compensation for Losses of Riparian Habitat Functions and Values Caused by Implementing the Vegetation Management Strategy Along Levees* (page 3.5-46)
- Mitigation Measure BIO-A-3 (NTMA & LTMA): *Inventory and Replace Shaded Riverine Aquatic Habitat* (page 3.5-49)
- Mitigation Measure BIO-A-4 (NTMA & LTMA): *Conform to NMFS Guidelines for Pile-Driving Activities* (page 3.5-51)
- Mitigation Measure BIO-A-5 (NTMA & LTMA): *Implement Mitigation Measures BIO-A-2a (NTMA) and BIO-A-2b (NTMA)* (page 3.5-53)
- Mitigation Measure BIO-A-6 (NTMA & LTMA): *Design and Implement Floodplain Habitat to Minimize Stranding* (page 3.5-55)
- Mitigation Measure BIO-A-2 (LTMA): *Implement Mitigation Measures BIO-A-2a (NTMA) and BIO-A-2b (NTMA)* (page 3.5-57)
- Mitigation Measure BIO-A-3 (LTMA): *Implement Mitigation Measures BIO-A-3 (NTMA)* (page 3.5-57)
- Mitigation Measure BIO-A-4 (LTMA): *Implement Mitigation Measure BIO-A-4 (NTMA)* (page 3.5-58)
- Mitigation Measure BIO-T-1a (NTMA & LTMA): *Conduct Biological Resources Surveys to Quantify Sensitive Natural Communities in Project Areas, and Avoid, Minimize, and, Where Appropriate, Compensate for Construction-Related Effects* (page 3.6-74)
- Mitigation Measure BIO-T-1b (NTMA & LTMA): *Minimize Construction-Related Effects on Critical Habitat and Compensate for Unavoidable Adverse Effects* (page 3.6-76)
- Mitigation Measure BIO-T-3b (NTMA & LTMA): *If Avoiding Construction-Related Effects on Special-Status Plants and Wildlife is Infeasible, Minimize and, Where Appropriate, Compensate for Effects on Special-Status Species and Loss of Habitat* (page 3.6-82)
- Mitigation Measure BIO-T-7b (NTMA & LTMA): *Implement Mitigation Measure BIO-A-2b (NTMA), "Ensure Full Compensation for Losses of Riparian Habitat Functions and Values Caused by Implementing the Vegetation Management Strategy Along Levees"* (page 3.6-94).

Delta Plan Mitigation Measure 4-4

1. Protect habitat for migratory waterfowl and shorebirds by expanding existing wildlife refuges and management areas and establishing new ones in or near wetland areas used by migratory waterfowl and shorebirds. Manage these areas by establishing suitable vegetation, hydrology and other habitat components to optimize the use by migratory waterfowl and shorebirds.
2. Protect, restore and enhance connectivity of habitats, including but not limited to wetland and riparian habitats that function as migration corridors for wildlife species. Habitat restoration might be accomplished by establishing suitable hydrology or other physical conditions for desirable vegetation, planting desirable vegetation, fencing and managing grazing, and other means.
3. Protect migratory pathways for migratory aquatic species such as salmon, steelhead, and sturgeon including those that use Delta tributaries and floodplain habitats by screening new diversions, and screening existing diversions and removing existing migration barriers if the specific proposed project/activity (e.g., increased intake volume through an existing unscreened

diversion, new diversion, new barrier, new barrier near an existing unscreened diversion, etc.) exacerbates the negative effect on migratory aquatic species caused by the existing barrier or unscreened diversion.

4. Avoid or minimize alteration of flow patterns and water quality effects that could disrupt migratory cues for migratory aquatic species by implementing water management measures and establishing programs to reduce water pollution.

CVFPP Consistency

Consistent.

1. The following mitigation measures identified in Section 3.6 of the 2012 CVFPP PEIR would cumulatively address impacts to migratory waterfowl, including pre-construction surveys, compensation for unavoidable impacts, implementation of BMPs outlined in all required state and/or federal permits, and design project features to limit impacts related to stranding.
 - Mitigation Measure BIO-T-3a (NTMA): *Conduct Focused Surveys for Special-Status Plants and Wildlife, and Avoid Impacts* (page 3.6-79)
 - Mitigation Measure BIO-T-3b (NTMA): *If Avoiding Construction-Related Effects on Special-Status Plants and Wildlife is Infeasible, Minimize and, Where Appropriate, Compensate for Effects on Special-Status Species and Loss of Habitat* (page 3.6-82)
 - Mitigation Measure BIO-T-3c (NTMA): *Secure Applicable State and/or Federal Permits and Implement Permit Requirements* (page 3.6-84)
 - Mitigation Measure BIO-T-1a (NTMA & LTMA): *Conduct Biological Resources Surveys to Quantify Sensitive Natural Communities in Project Areas, and Avoid, Minimize, and, Where Appropriate, Compensate for Construction-Related Effects* (page 3.6-74)
 - Mitigation Measure BIO-T-3a (NTMA and LTMA): *Conduct Focused Surveys for Special-Status Plants and Wildlife, and Avoid Impacts* (page 3.6-79)
 - Mitigation Measure BIO-T-3b (NTMA and LTMA): *If Avoiding Construction-Related Effects on Special-Status Plants and Wildlife is Infeasible, Minimize and, Where Appropriate, Compensate for Effects on Special-Status Species and Loss of Habitat* (page 3.6-82)
 - Mitigation Measure BIO-T-3c (NTMA and LTMA): *Secure Applicable State and/or Federal Permits and Implement Permit Requirements* (page 3.6-84)
2. The CVFPP would protect migratory pathways to the extent feasible. The following mitigation measures identified in Section 3.5 of the 2012 CVFPP PEIR, on page 3.5-55 and 3.5-58, would cumulatively address impacts for fish stranding associated with the creation of new floodplain habitat.
 - Mitigation Measure Mitigation Measure BIO-A-6 (NTMA): *Design and Implement Floodplain Habitat to Minimize Stranding*
 - Mitigation Measure BIO-A-6 (NTMA & LTMA): *Design and Implement Floodplain Habitat to Minimize Stranding* (page 3.5-55)
3. The CVFPP does not include work related to any diversions or in-water barriers.
4. See the determination above under 3-1, which describes mitigation measures that would be implemented to reduce water quality impacts.

Delta Plan Mitigation Measure 4-5

Prior to construction, evaluate impacts to trees or other biological resources protected by local policies and ordinances, and abide by any permit requirements associated with these policies and ordinances.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.6 of the 2012 CVFPP PEIR include identifying applicable local conservation plans and considering development of a strategy to maintain plan consistency, and consult and/or coordinate with the appropriate entity or plan administrator to develop and implement measures to avoid, minimize, and where necessary, compensate for effects on local plans.

- Mitigation Measure BIO-T-5b (NTMA and LTMA): *Identify Local Plans and Policies and Develop Strategy to Maintain Plan Consistency, Minimize Effects, or Compensate for Construction-Related Effects on Local Plans* (page 3.6-87).

Delta Flood Risk

Delta Plan Mitigation Measures 5-1, 5-2, 5-4, and 5-5

Delta Plan Mitigation Measures 5-1, 5-2, 5-4, and 5-5 include the following measures:

1. Prepare a drainage or hydrology and hydraulic study that would assess the need and provide a basis for the design of drainage related mitigations, such as new onsite drainage systems or new cross drainage facilities. Prepare the study in accordance with applicable standards of Federal Emergency Management Agency (FEMA), USACE, state Department of Water Resources (DWR), Central Valley Flood Protection Board (CVFPB), as well as the local reclamation districts and flood control agencies and the counties and cities. Design subsequent mitigation measures in accordance with the final study and with the applicable standards of FEMA, USACE, DWR, and CVFPB. The study would identify potential increases in flood risks, including those that may result from new facilities.
2. Provide temporary drainage bypass facilities that would reroute drainage around, along, or over the Proposed Project facilities and construction sites. The temporary bypass facilities would be designed in accordance with the results and recommendations of a drainage or hydrologic and hydraulic study and would be in place and fully functional until long-term replacement facilities are completed.
3. Provide onsite stormwater detention storage at construction and project facility sites that would reduce project- caused short- or long-term increases in drainage runoff. The storage space placement and capacity would be designed based on the drainage or hydrologic and hydraulic study.
4. Based on the results of the drainage or hydrologic and hydraulic study, arrange the length of any stockpiles or other construction features in the direction of the floodplain flow to maximize surface flows under flood flow conditions.
5. Where high channel velocities might result from construction, provide bank protection, such as rip rap, to protect levees from erosion.

6. Where construction results in longer channel wind fetch lengths, install vegetative buffer zones or wave erosion protection on the water side slope of levees, such as rock or grouted rip rap, and increase levee freeboard to address higher wind and wave runup.
7. Based on the drainage or hydrology and hydraulics study, determine any resulting changes to available evacuation plans or emergency response times.
8. To reduce emergency response times and public safety risks, raise structures and major roads out of the floodplain.
9. Provide automated flood warning systems.
10. Develop and implement area-specific evacuation and emergency response plans.
11. Considering the results of the hydraulics study noted above, perform a seepage and stability analyses that would assess the need and act as a basis for design of other seepage- and stability related mitigations, such as cutoff walls, adjacent levees, setback levees, berms, and subdrainage features. Perform the analyses in accordance with applicable standards of FEMA, USACE, and DWR.
12. Perform research and collect subsurface information in accordance with applicable standards of FEMA, USACE, and DWR and perform settlement analyses that would assess the need for monitoring and potential settlement- related mitigations, such as ground improvement or pre-construction surcharging. Perform the analyses in accordance with applicable standards of USACE.
13. Perform research and collect subsurface information in accordance with applicable standards of FEMA, USACE, and DWR and perform seismic and liquefaction analyses that would assess the need and provide the basis for design of other seismic related mitigations, such as ground improvement. Perform the analyses in accordance with applicable standards of USACE and American Society of Civil Engineers and Southern California Earthquake Center.
14. Prepare and implement a plan for periodic maintenance, inspections, repair, and rehabilitation of new water storage and conveyance facilities that could cause flooding upon failure.
15. Provide redundancy and safety controls and devices on water storage and conveyance facilities (pump stations, canals, and tunnels) to protect against facility failure and subsequent flooding.
16. To limit flooding from the unlikely event of a conveyance facility failure, limit extensive flow escape with installation of safety devices such as gated checks.
17. Construct new evacuation roads and access roads, as necessary.
18. Conduct Golden Guardian emergency drills.
19. At in-stream construction sites that might reduce channel capacity, install setback levees or bypass channels to maintain channel capacity and to mitigate hydraulic impacts.
20. Provide cross drainage, replacement drainage paths and facilities, and enlarged flow paths to reroute drainage around, under, or over the Proposed Project facilities and to restore the function of any affected existing drainage or flow paths and facilities.
21. Channel modifications for restoration actions would be required to be implemented to maintain or improve flood management functions and would be coordinated with the USACE, DWR, CVFPB, and other flood control agencies to assess the desirability and feasibility for channel modifications. To the extent consistent with floodplain land uses and flood control requirements, if applicable, woody riparian vegetation would be allowed to naturally establish.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to flood risk. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Land Use

Delta Plan Mitigation Measure 6-1

1. Minimize physical division of existing established communities or residential areas by designing new facilities and infrastructure to be located underground or with sufficient points of visual and physical access. Examples of methods of minimizing physical division include (but are not limited to):

- Burying or visually masking new infrastructure or facilities;
- Restoring disturbed landscapes back to preconstruction conditions;
- Reestablishing access (e.g., reconnecting roads, rebuilding bridges);
- Relocating landmark buildings; or
- Implementing other feasible mitigation to reduce the disturbance to a community's physical composition, visual character, or other features integral to the community's identity.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to physical division of established communities or residential areas. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Delta Plan Mitigation Measure 6-2

Compensate for the loss or reduction in environmental values protected by the subject plan or policy. For example, if the project would result in conversion of agricultural land to a non-agricultural use, potential mitigation actions could include:

- Recording a deed restriction that ensures permanent conservation and mitigation on other property of equal or greater environmental mitigation value;
- Creating a buffer or barrier between uses;
- Redesigning the project or selecting an alternate location that avoids or mitigates the impact; and/or
- Restoring disturbed land to conditions to provide equal or greater environmental value to the land affected by the covered action.

CVFPP Consistency

Consistent.

Mitigation Measures identified in Sections 3.3, 3.14, and 3.18 of the 2012 CVFPP PEIR offer guidance to project proponents to compensate for loss of residences, preserve and where necessary compensate for

loss of agricultural land, avoid impacts to recreational land use, and where necessary, replace recreational facilities.

- Mitigation Measure LU-5a (NTMA): *Provide Financial Compensation for Property Loss and Relocation Assistance to Compensate for the Removal and Displacement of Residential Land Uses* (page 3.14-43)
- Mitigation Measure AG-1a (NTMA): *Preserve Agricultural Productivity of Important Farmland to the Extent Possible* (page 3.3-34)
- Mitigation Measure AG-1c (NTMA): *Establish Conservation Easements Where Potentially Significant Agricultural Land Use Impacts Still Occur after Implementation of Mitigation Measures AG-1a and AG-1b* (page 3.3-37)
- Mitigation Measure REC-1 (NTMA): *Replace Displaced Recreational Facilities and Access* (page 3.18-48)
- Mitigation Measure REC-2 (NTMA): *Avoid Construction Activities and Staging near Recreational Facilities and Time Such Activities to Avoid the High-Use Recreation Season*, (page 3.18-48)

Agriculture and Forestry Resources

Delta Plan Mitigation Measure 7-1

1. Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land.
2. For projects that will result in permanent conversion of Farmland, preserve in perpetuity other Farmland through acquisition of an agricultural conservation easement, or contributing funds to a land trust or other entity qualified to preserve Farmland in perpetuity (at a target ratio of 1:1, depending on the nature of the conversion and the characteristics of the Farmland to be converted, to compensate for permanent loss).
3. Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management.
4. Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.
5. Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land.
6. Establish buffer areas between projects and adjacent agricultural land that are sufficient to protect and maintain land capability and agricultural operation flexibility. Design buffers to protect the feasibility of ongoing agricultural operations and reduce the effects of construction- or operation-related activities (including the potential to introduce special-status species in the agricultural areas) on adjacent or nearby properties. The buffer shall also serve to protect ecological restoration areas from noise, dust, and the application of agricultural chemicals. The width of the buffer shall be

determined on a project-by-project basis to account for variations in prevailing winds, crop types, agricultural practices, ecological restoration, or infrastructure. Buffers can function as drainage swales, trails, roads, linear parkways, or other uses compatible with ongoing agricultural operations.

CVFPP Consistency

Consistent.

As a planning document, the CVFPP describes mitigation measures that could be implemented by project proponents. The mitigation measures that are consistent with this Delta Plan mitigation measure are found in Sections 3.2 of the 2012 CVFPP PEIR which would minimize impacts to Williamson Act-Contracted Lands to the greatest extent possible, preserve Important Farmland, and where necessary establish conservation easements.

- Mitigation Measure AG-1a (NTMA & LTMA): *Preserve Agricultural Productivity of Important Farmland to the Extent Feasible* (page 3.3-34)
- Mitigation Measure AG-1b (NTMA & LTMA) *Minimize Impacts on Williamson Act-Contracted Lands, Comply with Government Code Sections 51290–51293, and Coordinate with Landowner and Agricultural Operators* (page 3.3-36)
- Mitigation Measure AG-1c (NTMA & LTMA): *Establish Conservation Easements Where Potentially Significant Agricultural Land Use Impacts Remain after Implementation of Mitigation Measures AG-1a (NTMA) and AG-1b (NTMA)* (page 3.3-37)
- Mitigation Measure BIO-T-1a (NTMA and LTMA): *Conduct Biological Resources Surveys to Quantify Sensitive Natural Communities in Project Areas, and Avoid, Minimize, and, Where Appropriate, Compensate for Construction-Related Effects* (page 3.6-74)

Additionally, the 2017 CVFPP Update Supplemental PEIR states that other measures may be available to further lessen the significant impacts; for example, the DWR Agricultural Lands Stewardship Workgroup has developed 36 strategies for farmland impact avoidance, minimization, and mitigation. These measures will be reviewed and considered on a project-by-project basis.

Implementation of the above-mentioned mitigation measures would limit impacts to agricultural land to the extent feasible. However, until the case-by-case analysis for each project is complete, it is not possible to conclude that all potentially significant impacts could and would be mitigated to a less-than-significant level.

Delta Plan Mitigation Measure 7-2

Design proposed projects to minimize, to the greatest extent feasible, conflicts and inconsistencies with land protected by agricultural zoning or a Williamson Act contract and the terms of the applicable zoning/contract.

CVFPP Consistency

Consistent.

The CVFPP includes analysis of projects that may impact agricultural land with current Williamson Act contracts. The 2012 CVFPP PEIR identified potentially significant impacts related to the cancellation of a substantial number of Williamson Act contracts. Mitigation identified in Section 3.3 of the 2012 CVFPP PEIR which would minimize impacts to Williamson Act-Contracted Lands to the greatest extent

possible, preserve Important Farmland, and where necessary establish conservation easements. However, until the case-by-case analysis for each project is complete, it is not possible to conclude that all potentially significant impacts could and would be mitigated to a less-than-significant level.

- Mitigation Measure AG-1a (NTMA & LTMA): *Preserve Agricultural Productivity of Important Farmland to the Extent Feasible* (page 3.3-34)
- Mitigation Measure AG-1b (NTMA & LTMA) *Minimize Impacts on Williamson Act–Contracted Lands, Comply with Government Code Sections 51290–51293, and Coordinate with Landowner and Agricultural Operators* (page 3.3-36)
- Mitigation Measure AG-1c (NTMA & LTMA): *Establish Conservation Easements Where Potentially Significant Agricultural Land Use Impacts Remain after Implementation of Mitigation Measures AG-1a (NTMA) and AG-1b (NTMA)* (page 3.3-37)

Delta Plan Mitigation Measure 7-3

Avoid land protected as forestland and timberland through site selection and/or project design. Where feasible, project proponents should take into account the value of the forest, not only in terms of direct products such as wood but also as part of the watershed ecosystem, when selecting a project site. Wherever possible, nonprotected sites should be preferred and selected instead of protected sites.

CVFPP Consistency

Consistent.

Implementation of the combined elements of the vegetation management strategy would result in the removal of riparian forest habitat in some areas. The CVFPP identified potentially significant impacts related to the conversion of riparian woodland. Mitigation measures identified in Section 3.3 of the 2012 CVFPP PEIR state that project proponents may coordinate with the CVFPB and local maintaining agencies (LMAs) tasked to develop and implement a plan to record data on riparian vegetation lost or removed and to ensure adequate compensation for losses of riparian habitat functions and values. Implementation of Mitigation Measure BIO-A-2b would reduce impacts related to conversion of forestland to a less-than-significant level.

Mitigation Measure AG-6 (NTMA): *Implement Mitigation Measure BIO-A-2b (NTMA), “Ensure Full Compensation for Losses of Riparian Habitat Functions and Values Caused by Implementing the Vegetation Management Strategy Along Levees”* (page 3.3-42)

Delta Plan Mitigation Measure 7-4

1. For projects that will result in permanent conversion of Forestland, preserve in perpetuity other forestland through a conservation easement or by acquiring lands or contributing funds to a land trust or other agency (at a target ratio of 1:1, depending on the nature of the conversion and the characteristics of the Forestland to be converted, to compensate for permanent loss).
2. Avoid land protected as forestland and timberland through site selection and/or project design. Where feasible, project proponents should take into account the value of the forest, not only in terms of direct products such as wood, but also as part of the watershed ecosystem, when selecting a

project site. When possible, unprotected sites should be preferred and selected instead of protected sites.

3. When removal of existing forestland or timberlands is required as part of an action, proponents must acquire the property at fair market value.

CVFPP Consistency

Consistent.

1. The 2012 CVFPP PEIR identified significant impacts related to the conversion of riparian woodland. Mitigation measures identified in Section 3.3 of the 2012 CVFPP PEIR states that project proponents may coordinate with the CVFPB and LMAs to develop and implement a plan to record data on riparian vegetation lost or removed, and to ensure adequate compensation for losses of riparian habitat functions and values.
 - *Mitigation Measure AG-6 (NTMA): Implement Mitigation Measure BIO-A-2b (NTMA), "Ensure Full Compensation for Losses of Riparian Habitat Functions and Values Caused by Implementing the Vegetation Management Strategy Along Levees"* (page 3.3-42)
2. Forest impacts are at the locations where levee improvements are required and cannot be avoided.
3. Tree removal is required for flood control purposes and would take place on properties with flood control easements. No property acquisition would be required.

Visual Resources

Delta Plan Mitigation Measures 8-1 and 8-2

Delta Plan Mitigation Measure 8-1

1. Use compatible colors for proposed structural features, such as intakes, pumping plants, and surge towers. Use earth tone paints and stains with low levels of reflectivity.
2. Minimize the vertical profile of proposed structures as much as possible. Where possible, use subgrades for floors of structures. Use landscaped berms instead of walls to mask views of structures from high-visibility sites. Use green roof design where roof structures would be highly visible.
3. Use vegetation plantings on proposed facility walls, such as climbing plants, espaliers, and other forms that soften the appearance of structures.
4. Develop a landscaping plan for all proposed structures. Provide vegetative screening to soften views of structures. Landscaping should complement the surrounding landscape.
5. Round the tops and bottoms of spoil disposal areas and contour the faces of slopes to create more natural-looking landforms. Create visual diversity by planting vegetation with diverse growth forms on the spoil disposal areas; plant with more than just grasses.
6. Landscape parking areas at proposed facilities, and include low impact design features, such as permeable pavers, tree basins, and bioswales, that reduce stormwater runoff and enhance visual quality.
7. Conduct only partial vegetative clearing of the limits of construction rather than clear the entire area; partial clearing would leave islands of vegetation and result in a more natural look. Use irregular clearing shapes with feathered edges instead of hard edges to promote a more natural effect.

8. Develop design form and materials with a goal to achieve aesthetic visual character instead of a strictly utilitarian objective. Use cast natural form elements or natural materials for facing to achieve texture and color compatible with the adjacent landscape; natural materials would be preferable for areas of high visibility and public use. Landscape areas adjacent to facilities. Use natural materials, such as wood and stone, for signage at proposed facilities.
9. Develop aesthetically pleasing landscaping for relocated roads at the shoulders, intersections, and on- and off- ramps from highways. Design turnouts and scenic vista points where appropriate for relocated roads with high visibility and high public use.
10. To the extent consistent with the safety and reliability of the electric grid, as well as site-specific considerations, use single-pole electrical transmission towers instead of lattice-form towers for proposed large electrical transmission lines, and put transmission lines underground along areas with high visibility and high public use.
11. Consider developing aesthetically well-designed visitor centers, vantage areas, or observation decks at appropriate facilities with interpretation features, walking paths, and other features. Although developing visitor centers would not reduce a visual impact, it would have the effect of making the facilities features of interest to the touring public.

Delta Plan Mitigation Measure 8-2

1. Implement elements of Mitigation Measure 8-1 for temporary construction activities and new facilities that are visible from scenic vistas and designated roads and highways as appropriate. Replace all scenic resources (e.g., large trees) that would be removed for the Proposed Project, when feasible. Identify compensatory mitigation for visual or aesthetic resources by providing improvements to areas with existing diminished scenic quality.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR does not identify significant impacts on visual character related to design or scenic vistas and designed roads and highways. Improvement activities in urban settings, would be similar to the visual character of the existing levee system would generally be consistent with current conditions. Additionally, work areas would not generally be visible from scenic vistas or designated scenic roads/highways. These mitigation measures are not applicable to the CVFPP. Therefore, the CVFPP does not include comparable mitigation measures.

Delta Plan Mitigation Measure 8-3

Use shields for proposed lighting facilities, and direct lighting downward and inward toward the facilities.

CVFPP Consistency

Consistent.

CVFPP-related projects could include the construction of new or replacement flood control facilities (e.g., pumping stations) that could include lighting and building materials that cause glare. Mitigation measures identified in Section 3.2 of the 2012 CVFPP PEIR, include shielding, redirecting, and prohibition

of high intensity or brightness lights, when project activities occur in the vicinity of sensitive light receptors to reduce potentially significant adverse effects associated with light and glare

- Mitigation Measure VIS-4 (NTMA): *Establish and Require Conformance to Lighting Standards, and Prepare and Implement a Lighting Plan* (page 3.2-31)

Air Quality

Delta Plan Mitigation Measure 9-1

- Use equipment and vehicles that are compliant with Air Resource Board (ARB) requirements and emission standards for on-road and off-road fleets and engines. New engines and retrofit control systems should reduce NOx and PM from diesel-fueled on-road and off-road vehicles and equipment.
- Minimize idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage should be posted for construction workers at all entrances to the site.
- Maintain all equipment in proper working condition according to manufacturer's specifications.
- Use electric equipment when possible. Use lower-emitting alternative fuels to power vehicles and equipment where feasible.
- Use low Volatile Organic Compounds (VOC) coatings and chemicals; minimize chemical use.
- Prepare a dust control plan and apply dust control measures at the construction sites.
- To minimize track-out of dirt and mud from dirt and gravel roads, all trucks and equipment, including their tires, shall be washed prior to leaving the site. Only exteriors of trucks and equipment are to be washed (no engine degreasing), no detergents or chemicals shall be used in the wash water, and off-site runoff of rinse water shall be prevented.
- For projects involving land fallowing, land conversion, or other agricultural operations, implement applicable BMPs from agencies such as the U.S. Department of Agriculture Natural Resources Conservation Service to reduce potential dust emissions.

BMPs for fallowed lands could include, but are not limited to, the following:

- Implement conservation cropping sequences and wind erosion protection measures, such as:
 - Plan ahead to start with plenty of vegetation residue and maintain as much residue on fallowed fields as possible. Residue is more effective for wind erosion protection if left standing.
 - If residues are not adequate, small grain can be seeded about the first of the year to take advantage of the winter rains and irrigated with a light irrigation if needed to get adequate growth.
 - Avoid any tillage if possible.
 - Avoid any traffic or tillage when fields are extremely dry to avoid pulverization.
 - Apply soil stabilization chemicals to fallowed lands.
 - Re-apply drain water to allow protective vegetation to be established.

- Reuse irrigation return flows to irrigate windbreaks across blocks of land including many fields to reduce wind fetch and reduce emissions from fallowed, farmed, and other lands within the block. Windbreak species, management, and layout would be optimized to achieve the largest feasible dust emissions reduction per unit water available for their irrigation. Windbreak corridors would provide ancillary aesthetic and habitat benefits.

Project-specific lists of mitigation measures should also include the recommendations or requirements of the local air district(s). For example, the Bay Area Air Quality Management District (BAAQMD) lists the following basic and additional mitigation measures to reduce emissions from project construction (BAAQMD, 2010. California Environmental Quality Act Air Quality Guidelines. December 2010. San Francisco, California. Site accessed February 8, 2011. <http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQAGUIDELINES.aspx>).

Basic Construction Mitigation Measures Recommended for ALL Proposed Projects

1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material offsite shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 mph.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
8. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold

1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.

4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.
6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.
8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.

CVFPP Consistency

Consistent.

The CVFPP PEIR identified potentially significant air quality emissions impacts. Mitigation measures identified in Section 3.4.6 of the 2012 CVFPP PEIR are similar to or more protective than those identified in Delta Mitigation Measure 9-1. Mitigation measures may include implementing applicable Air Management District BMPs to reduce construction- and operations-related emissions.

- Mitigation Measure AQ-1 (NTMA and LTMA): *Implement Measures to Reduce Construction-Related Emissions* (page 3.4-46)
- Mitigation Measure AQ-3 (LTMA): *Implement Measures to Reduce Operational Emissions* (page 3.4-59)

Delta Plan Mitigation Measure 9-2

Applicants should develop and implement a project -specific Odor Management Plan. Odor control measures that can be incorporated into this plan include, but are not limited to, the following:

- A list of potential odor sources
- Identification and description of the most likely sources of odor
- Identification of potential, intensity, and frequency of odor from likely sources
- A list of odor control technologies and management practices that could be implemented to minimize odor releases
- A protocol for monitoring, recording, reporting and responding to odor events, including notification of the local and downwind jurisdictions of projects that may result in odor complaints, including contact numbers for responsible individuals during construction. If odor an event occurs, construction activity should be suspended until conditions change, removing the cause and resultant odors, or until alternate management practices are implemented that significantly reduce the odors.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to odors. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures

Delta Plan Mitigation Measure 9-3

The Air Quality Technical Report prepared for the Proposed Project should evaluate human health risks from potential exposures of sensitive receptors to substantial pollutant concentrations on a project-specific basis. The need for a human health risk analysis should be evaluated using approved screening tools and discussed with the local Air Quality Management District (AQMD) or Air Pollution Control District (APCD) at the time of preparation of the Air Quality Technical Report. If the health risk is determined to be significant on a project-specific basis, control measures should be implemented to reduce health risks to levels below the applicable air district threshold. Implementation of one or more of the following requirements, where feasible and appropriate would reduce the effects of Impact 9 -3a, Construction or Operation of Projects Would Expose Sensitive Receptors to Substantial Pollutant Concentrations (from the 2013 Delta Plan Program EIR):

- Implement Mitigation Measure 9-1 to reduce air emissions and air quality impacts from construction and operations of the Proposed Project.
- Use equipment with diesel engines designed or retrofitted to minimize DPM emissions, usually through the use of catalytic particulate filters in the exhaust.
- Use electric equipment to eliminate local combustion emissions.
- Use alternative fuels, such as compressed natural gas or liquefied natural gas.

If the project would result in significant emissions of airborne, naturally occurring asbestos or metals from excavation, hauling, blasting, tunneling, placement, or other handling of rocks or soil, a dust mitigation and air monitoring plan would be required to specify site specific measures to minimize emissions and that airborne concentrations of the toxic air contaminants (TACs) of concern do not exceed regulatory or risk-based trigger levels.

CVFPP Consistency

Consistent.

The 2012 CVFPP PEIR identified potentially significant impacts to air quality emissions. Mitigation measures identified in Section 3.4 of the 2012 CVFPP PEIR address impacts related to exposures of sensitive receptors to substantial pollutant concentrations by including compliance for areas within 0.5 mile of state-identified naturally occurring asbestos areas with measures outlined in the ARB's Asbestos Air Toxic Control Measures for Construction, Grading, Quarrying, and Surface Mining Operations, and implementing an asbestos dust mitigation plan and asbestos health and safety program, as necessary.

- Mitigation Measure AQ-6 (NTMA and LTMA): *Implement Strategies to Protect Sensitive Receptors from Substantial Construction-Related Emissions of Naturally Occurring Asbestos* (page 3.4-54)

Furthermore, as discussed above under Delta Plan Mitigation Measure 9-1, mitigation measures could include implementing applicable Air Management District BMPs to reduce construction- and operations-related emissions

Cultural Resources

Delta Plan Mitigation Measure 10-1

1. Before any ground-disturbing activities begin, conduct intensive archaeological surveys, including subsurface investigations to identify the locations, extent, and integrity of presently undocumented archaeological resources that may be located in areas of potential disturbance. In addition, if ground-disturbing activities are planned for an area where a previously documented prehistoric archaeological site has been recorded but no longer may be visible on the ground surface, conduct test excavations to determine whether intact archaeological subsurface deposits are present. Also conduct surveys at the project site for the possible presence of cultural landscapes and traditional cultural properties.
2. If potentially CRHR-eligible prehistoric or historic-era archaeological resources are discovered during the survey phase, additional investigations may be necessary. These investigations could include, but not necessarily be limited to, measures providing resource avoidance, archival research, archaeological testing and California Register of Historical Resources (CRHR) eligibility evaluations, and contiguous excavation unit data recovery. In addition, upon discovery of potentially CRHR-eligible prehistoric resources, coordinate with the NAHC and the Native American community to provide for an opportunity for suitable individuals and tribal organizations, including federally recognized tribes, to comment on the proposed research.
3. If CRHR-eligible archaeological resources or cultural landscapes/properties are present and would be physically impacted, specific strategies to avoid or protect these resources should be implemented if feasible. These measures may include:
 - Planning construction to avoid the sensitive sites.
 - Deeding the sensitive sites into permanent conservation easements.
 - Capping or covering archaeological sites.
 - Planning parks, green space, or other open space to incorporate the sensitive sites.
 - Granting of cultural easements to Native American tribes for the purpose of protecting cultural resource properties.
4. If federal agencies are participants in the activity and Section 106 of the National Historic Preservation Act applies, conduct formal consultation with the State Historic Preservation Officer, Tribal Historic Preservation Officer (THPO) or Tribal Administrator for tribes that do not have a THPO, and the Native American community. Potential adverse effects on cultural resources recommended as eligible for listing in the National Register of Historic Places (NRHP) will be resolved through the development of a memorandum of agreement and/or a program-level agreement.
5. As part of efforts to identify, evaluate, and consider cultural resources, including prehistoric sites, Native American human remains, and traditional cultural properties, Native Americans would be consulted. The California Native American Heritage Commission (NAHC) would be asked to provide a list of Native Americans who should be contacted concerning an identified future project. The NAHC

would also be asked to search its Sacred Lands Files. Native Americans identified by the NAHC would be contacted by letter to request information on cultural resources of importance. They also would be asked to identify concerns they have about the project. THPOs and Tribal Administrators of federally recognized tribes would be contacted and asked to search their files and provide information necessary for the identification and consideration of cultural resources.

6. Before any project-specific ground-disturbing activities begin, conduct investigations to identify submerged cultural resources. These investigations would include review of State Lands Commission (SLC) Shipwrecks Database and other SLC files, and remote sensing surveys conducted under the direction of a qualified maritime archaeologist. If avoidance of significant submerged cultural resources is not feasible, a permit from SLC may be necessary to conduct resource documentation and possible salvage of artifacts, ship components, and other data and objects.
7. If CRHR-eligible archaeological resources, including submerged or buried shipwrecks or other maritime related cultural resources, are discovered during construction activities, work would halt within 100 feet of the discovery until the find can be evaluated by a qualified archaeologist or maritime archaeologist as appropriate. In addition, SLC would be consulted.

CVFPP Consistency

Consistent.

CVFPP mitigation measures are similar to or more protective than those identified in Delta Plan Mitigation Measure 10-1. Mitigation measures identified in Section 3.8 of the 2012 CVFPP PEIR, Section 3.4 of the 2017 CVFPP Supplemental PEIR, and revised in Section 4.3 of the 2022 CVFPP Addendum could significantly reduce impacts to cultural and Tribal resources by conducting pre-construction cultural resources studies and database searches for cultural resources and Traditional Cultural Properties (TCPs), halting construction if cultural or Tribal resources are discovered, consultation with Native American Tribes, and implementation worker awareness training.

- Mitigation Measure CUL-1a (NTMA and LTMA): Conduct Cultural Resource Studies and Avoid Effects on Known Archaeological Resources (page 3.8-25),
- Mitigation Measure CUL-1b (NTMA and LTMA): Conduct Additional Evaluations and Recover Sufficient Data to Compensate for Damage to or Destruction of Known Archaeological Sites (page 3.8-26),
- Mitigation Measure CUL-2 (NTMA and LTMA): If Cultural Resources Are Discovered, Immediately Halt Construction and Implement an Accidental-Discovery Plan (page 3.8-27),
- Mitigation Measure CUL-4a (NTMA and LTMA): Conduct Cultural Resources Studies and Avoid Effects on TCRs (page 3.8-30 of 2012 CVFPP PEIR and page 22 of 2022 CVFPP Addendum)
- Mitigation Measure CUL-4b (NTMA and LTMA): Consult with Native American Communities and Implement Appropriate Measures to Mitigate Effects on TCRs (page 3.8-31 of 2012 CVFPP PEIR and page 22 of 2022 CVFPP Addendum)

Additionally, the following mitigation identified in Section 3.4 of the 2017 CVFPP Supplemental PEIR could further reduce impacts to cultural and Tribal resources.

- Mitigation Measure CUL-4c: *Cultural Resource Awareness and Sensitivity Training* (page 3-35)

Lastly, the following mitigation measures identified in Section 4.3 of the 2022 CVFPP Addendum could further reduce impacts to cultural and Tribal resources.

- Mitigation Measure CUL-5a (NTMA and LTMA): *Conduct Cultural Resources Studies and Avoid Effects on TCPs* (page 25)
- Mitigation Measure CUL-5b (NTMA and LTMA): *Consult with Native American Communities and Implement Appropriate Measures to Mitigate Effects on TCPs* (page 25)
- Mitigation Measure CUL-5c (NTMA and LTMA): *Cultural Resource Awareness and Sensitivity Training* (page 25)

Delta Plan Mitigation Measure 10-2

The identification, evaluation, and determination of disposition of Native American human remains shall be conducted in accordance with Native American consultation procedures described below and in Mitigation Measure 10-1. The location, content, and character of Native American human remains are confidential and shall not be released to the public. Native American human remains and associated funerary objects shall be treated with the utmost respect and in accordance with the direction of the identified Most Likely Descendant (MLD).

1. If human remains are encountered during ground-disturbing construction activities, stop work that would potentially affect the find and contact the county coroner.
 - In accordance with the California Health and Safety Code and the California Native American Grave Protection and Repatriation Act (CNAGPRA), if human remains are uncovered during ground-disturbing activities, the contractor shall immediately halt potentially damaging excavation in the area of the burial and notify the county coroner, a professional archaeologist to determine the nature of the remains, and a representative of California Indian tribes. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or State lands (Health and Safety Code section 7050.5[b]). If the coroner determines that the remains are those of a Native American, he or she must contact the NAHC by telephone within 24 hours of making that determination (Health and Safety Code section 7050[c]).
 - Following the coroner's findings, the property owner, contractor or project proponent, an archaeologist, and the NAHC-designated Most Likely Descendent (MLD) shall determine the ultimate treatment and disposition of the remains and take appropriate steps to ensure that additional human interments are not disturbed. The responsibilities for acting upon notification of a discovery of Native American human remains are identified in California Public Resources Code section 5097.9.
 - Upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity (according to generally accepted cultural or archaeological standards and practices) is not damaged or disturbed by further activity until consultation with the MLD has taken place. The MLD shall have 48 hours to complete a site inspection and make recommendations after being granted access to the site.
 - A range of possible treatments for the remains, including nondestructive removal and analysis, preservation in place, relinquishment of the remains and associated items to the descendants,

or other culturally appropriate treatment may be discussed. California Public Resources Code section 5097.9 suggests that the concerned parties may extend discussions beyond the initial 48 hours to allow for the discovery of additional remains. The following is a list of site protection measures that the landowner shall employ: (1) Record the site with the NAHC or the appropriate information center. (2) Use an open space or conservation zoning designation or easement. (3) Record a document with the county in which the property is located.

- The landowner or his or her authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity on the property in a location not subject to further subsurface disturbance if the NAHC is unable to identify a MLD or if the MLD fails to make a recommendation within 48 hours after being granted access to the site. The landowner or his or her authorized representative may also reinter the remains in a location not subject to further disturbance if he or she rejects the recommendation of the MLD and mediation by the NAHC fails to provide measures acceptable to the landowner.

If the discovery of human remains occurs on lands owned and administered by a federal agency, the provisions of the Native American Graves Protection and Repatriation Act (NAGPRA) will apply. NAGPRA requires federal agencies and certain recipients of federal funds to document Native American human remains and cultural items in their collections, notify native groups of their holdings, and provide an opportunity for repatriation of these materials. The act also requires planning for dealing with potential future collections of Native American human remains and associated funerary objects, sacred objects, and objects of cultural patrimony.

CVFPP Consistency

Consistent.

The 2012 CVFPP PEIR describes mitigation measures that include compliance with State and federal laws related to human remains. Mitigation measures identified in CVFPP Section 3.8 of the 2012 CVFPP PEIR and revised in Section 4.3 of the 2022 CVFPP Addendum could reduce impacts to undiscovered human remains by including cultural resource studies and implementation of avoidance measures to limit impacts to human remains. Additionally, construction activities could be halted if human remains are discovered.

- Mitigation Measure CUL-6a (NTMA and LTMA): *Conduct Cultural Resources Studies and Avoid Effects on Human Remains* (page 3.8-32 of the 2012 CVFPP PEIR, revised on page 27 of the 2022 CVFPP Addendum)
- Mitigation Measure CUL-6b (NTMA and LTMA): *Relocate Known Cemeteries* (page 3.8-33 of the 2012 CVFPP PEIR, revised on page 27 of the 2022 CVFPP Addendum)
- Mitigation Measure CUL-6c (NTMA and LTMA): *Immediately Halt Construction If Human Remains Are Discovered and Implement a Burial Treatment Plan* (page 3.8-33 of the 2012 CVFPP PEIR, revised on page 27 of the 2022 CVFPP Addendum)

Delta Plan Mitigation Measure 10-3

1. Inventory and evaluate historic-era buildings, structures, and linear features. Conduct cultural resource studies to determine whether historic-era buildings, structures, and linear features in the project area are eligible for listing in the CRHR.
2. Before construction activities begin, an inventory and evaluation of historic-era resources in the project area should be conducted under the direct supervision of an architectural historian meeting the Secretary of the Interior's Professional Qualification Standards for history or architectural history. The documentation should include conducting an intensive field survey, background research on the history of the project area, and property-specific research. Based on this research, the eligibility of historic-era resources located in the project area should be evaluated by the architectural historian using criteria for listing in the CRHR. The resources would be recorded on DPR 523 forms and the findings documented in a technical report. If federal funding or approval is required, then the project implementation agencies would comply with Section 106 of the National Historic Preservation Act.
3. Identify measures to avoid significant historic resources. Avoidance through project redesign is the preferred mitigation measure for mitigating potential effects on historic-era buildings, structures, linear features, and archaeological sites that appear to be eligible for listing in the NRHP or CRHR.
4. Record photographic and written documentation to Historic American Building Survey (HABS)/Historic American Engineering Record (HAER) standards. If avoidance of a significant historic resource is not feasible, the lead agency should ensure that HABS/HAER documentation is completed. Through HABS/HAER documentation, a qualified architectural historian and qualified photographer should formally document the historic resource through large-format photography, measured drawings, written architectural descriptions, and historical narratives. The completed documentation should be submitted to the Library of Congress.
5. Conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings in the event of relocation. If any historic buildings, structures, or levees are relocated or altered, the lead agency should ensure that any changes to significant buildings or structures conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Implementation of this measure can mitigate potential changes to significant architectural resources.
6. Conform to the Secretary of the Interior's Guidance for the Treatment of Cultural Landscapes to preserve landscapes' historic form, features, and details that have evolved over time.

CVFPP Consistency

Consistent.

Mitigation measures identified in CVFPP PEIR Section 3.8 include cultural resource studies prior to construction and recommend that construction follows the Secretary of the Interior's Standards to reduce potential impacts to built-environment resources.

- Mitigation Measure CUL-3a (NTMA and LTMA): *Conduct Cultural Resources Studies and Avoid Effects on Built-Environment Resources* (page 3.8-29)
- Mitigation Measure CUL-3b (NTMA and LTMA): *Follow the Secretary of the Interior's Standards for the Treatment of Historic Properties* (page 3.8-29)

- Mitigation Measure CUL-3c (NTMA and LTMA): *Record Built-Environment Resources to Historic American Buildings Survey and Historic American Engineering Record Standards* (page 3.8-29)

Delta Plan Mitigation Measure 10-4

Mitigation Measures 10-1 and 10-3 will also mitigate Impact 10-4, Disturbance or Destruction of Cultural Landscapes and Traditional Cultural Properties. However, to mitigate Impact 10-4, Mitigation Measure 10-1 surveys and Mitigation Measure 10-3 inventories would focus on cultural landscapes and Traditional Cultural Properties.

CVFPP Consistency

Consistent.

See the response above under Delta Plan Mitigation Measures 10-1 and 10-3. Mitigation measures identified in Section 3.8 of the 2012 CVFPP PEIR and Section 4.3 of the 2022 CVFPP Addendum include pre-construction cultural resource surveys and database searches to identify locations of TCPs, consultation with Native American Tribes, and where necessary, avoidance or relocation of TCPs.

- Mitigation Measure CUL-4a (NTMA and LTMA): *Conduct Cultural Resources Studies and Avoid Effects on TCRs* (page 3.8-30)
- Mitigation Measure CUL-4b (NTMA and LTMA): *Consult with Native American Communities and Implement Appropriate Measures to Mitigate Effects on TCRs* (page 3.8-31)
- Mitigation Measure CUL-5a (NTMA and LTMA): *Conduct Cultural Resources Studies and Avoid Effects on TCPs* (page 25)
- Mitigation Measure CUL-5b (NTMA and LTMA): *Consult with Native American Communities and Implement Appropriate Measures to Mitigate Effects on TCPs* (page 25)
- Mitigation Measure CUL-5c (NTMA and LTMA): *Cultural Resource Awareness and Sensitivity Training* (page 25)

Geology and Soils

Delta Plan Mitigation Measures 11-1, 11-2, and 11-3

Delta Plan Mitigation Measure 11-1

1. For construction that occurs in an Alquist-Priolo Special Studies Zone, a determination must be made by a licensed practitioner (California Certified Engineering Geologist) that no fault traces are present within the building footprint of any structure intended for human occupancy. The standard of care for such determinations includes direct examination of potentially affected subsurface materials (soil and/or bedrock) by logging of subsurface trenches. Uncertainties regarding the exact locations of future ground ruptures associated with such determinations generally are resolved by providing a minimum setback of 50 feet from any known surface trace of an active fault. For critical structures, such as hospitals, dams, and emergency facilities, more stringent mitigation measures are required, including but not limited to greater structural setbacks and heavier reinforcement against strong ground motion, in compliance not only with California regulations but in many cases in compliance with additional Federal regulations.
2. Lead agencies shall ensure that geotechnical design recommendations are included in the design of facilities and construction specifications to minimize the potential impacts from

seismic events and the presence of adverse soil conditions. Recommended measures to address adverse conditions shall conform to applicable design codes, guidelines, and standards.

Mitigation Measure 11-2

1. Require adherence, at minimum, to the precepts of the current approved version of the International Building Code (IBC). Included in the IBC are measures for mitigation of the impacts of strong ground motion on constructed works. In addition to the California–required conformance with the IBC, for critical structures, such as dams (including levees), hospitals, and emergency facilities, additional construction requirements are codified in federal statutes and the regulations of various federal agencies. Lead agencies will, by force of law, require conformance with these codified mitigation measures.

Mitigation Measure 11-3

1. For projects that would result in significant or potentially significant grading operations, a geotechnical investigation shall be performed and a geotechnical report prepared. The geotechnical report shall include a quantitative analysis to determine whether excavation or fill placement would result in a potential for damage due to soil subsidence during and/or after construction. Project designs shall incorporate measures to reduce the potential damage to an insignificant level, including but not limited to removal and recompaction of existing soils susceptible to subsidence, ground improvement (such as densification by compaction or grouting, soil cementation), and reinforcement of structural components to resist deformation due to subsidence. The site-specific potential for and severity of cyclic seismic loading shall be analyzed in the assessment of subsidence for specific projects.
2. A geotechnical investigation shall be performed by an appropriately licensed professional engineer and/or geologist to determine the presence and thickness of potentially liquefiable sands that could result in loss of bearing value during seismic shaking events. Project designs shall incorporate measures to mitigate the potential damage to an insignificant level, including but not limited to ground improvement (such as grouting or soil cementation), surcharge loading by placement of fill, excavation, soil mixing with non-liquefiable finer-grained materials and replacement of liquefiable materials at shallow depths, and reinforcement of structural components to resist deformation due to liquefaction. An analysis of site-specific probable and credible seismic acceleration values, in accordance with current applicable standards of care, shall be performed to provide for suitable project design.
3. For projects that would result in construction of wells intended for groundwater extraction, a hydrogeological/geotechnical investigation shall be performed in accordance with the current standards of care for such work by an appropriate licensed professional engineer or geologist to identify and quantify the potential for groundwater extraction-induced subsidence. The study shall include an analysis of existing conditions and modeling of future conditions to assess the potential for aquifer compaction/consolidation.
4. For projects that would result in construction of surface reservoirs and canals a hydrogeological/geotechnical investigation shall be performed by a licensed professional engineer or geologist to identify and quantify the potential for seeps and springs to develop in

areas adjacent to the proposed improvements and to propose mitigation measures. Mitigation of such seepage could include, without limitation, additives to concrete that reduce its permeability, construction of impervious liner systems, and design and construction of subdrainage (passive control) or dewatering systems (active control). Geotechnical investigations and preparation of geotechnical reports shall be performed in the responsible care of California licensed geotechnical professionals including professional civil engineers, certified geotechnical engineers, professional geologists, certified engineering geologists, and certified hydrogeologists, all of whom should be practicing within the current standards of care for such work.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR does not identify significant impacts to geology and soils related to Alquist-Priolo Special Studies Zone, seismic activities, and liquefaction. Additionally, the CVFPP does not include construction of wells, surface reservoirs, or canals. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Delta Plan Mitigation Measure 11-4

Any covered action that would have significant soil erosion and topsoil loss impacts (Impact 11-4) shall incorporate specific measures for future projects that would expand the use of BMPs or optional erosion control measures listed in the SWPPPs. The SWPPP shall identify an effective combination of BMPs to reduce erosion during construction and to prevent erosion during operation. Examples of typical BMPs include:

- Erosion control measures such as silt fencing, sandbags, straw bales and mats, and rice straw wattles shall be placed to reduce erosion and capture sediment. Straw used for erosion control shall be new cereal grain straw derived from rice, wheat, or barley; free of mold and noxious weed seed; and neither derived from dry-farmed crops nor previously used for stable bedding. Clearance shall be obtained from the County Agricultural Commissioner before straw obtained from outside the county is delivered to the work site. Monitoring requirements of the newly revised General Construction Permit shall be implemented, and more effective BMPs shall be identified and installed if runoff samples indicate excessive turbidity.
- During construction activities, topsoil shall be removed, stockpiled, and saved for reapplication following completion of construction. The top 6 inches shall be salvaged and reapplied to a comparable thickness. Soil material shall be placed in a manner that minimizes compaction and promotes plant reestablishment.
- If catch basins are used for sediment capture, the site shall be graded to ensure stormwater runoff flows into the basins, and basins shall be designed for the appropriate storm interval as provided in the General Construction Permit.
- Temporary work areas shall be surfaced with a compacted layer of well-graded gravel. They may be covered with a thin asphalt binder. Where expansive or compressible soils are present in temporary work areas, construction trailers shall be supported with concrete pads or footings.

- Dust control shall conform to all federal, State, and local requirements and may include use of water trucks, street sweepers, or other methods described in the SWPPP.
- Spoils shall be placed in 12-inch-thick loose lifts and compacted to reduce erosion and minimize future subsidence. Placement of peat spoils shall be on agricultural land where possible. Following construction, spoils sites shall be restored to avoid erosion.

CVFPP Consistency

Consistent.

As a planning document, the CVFPP describes mitigation measures that could be implemented by project proponents. The mitigation measures that are consistent with this Delta Plan mitigation measure are found in Sections 3.12, 3.13, and 3.21 of the 2012 CVFPP PEIR, on pages 3.13-18 and 3.21-43. These measures include:

- Mitigation Measure HYD-1 (NTMA and LTMA): *Identify and Implement Measures to Minimize Downstream Erosion and Siltation*
- Mitigation Measure SWQ-3 (NTMA and LTMA): *Conduct and Comply with Phase I Environmental Site Assessments*
- Mitigation Measure GRW-5a (LTMA): *Develop and Implement Groundwater Management Plans or Expand Existing Groundwater Management Plans, Including Defining Basin Management Objectives, Groundwater Monitoring Plans, and Conditions under Which Corrective Actions Are Taken.*
- Mitigation Measure HHM-2 (NTMA and LTMA): *Conduct a Site-Specific Analysis to Determine the Proximity of School Sites, Notify and Consult with Affected Schools, and Implement Storm Water Pollution Prevention Plan and Best Management Practices as Required.*

These mitigation measures provide guidance that project proponents may perform an analysis of the new facilities to determine whether the facility will experience or cause elsewhere a downstream erosion or siltation problem. To the extent possible, new facilities will be designed to avoid or minimize these effects. Project proponents will also conduct Phase I Environmental Site Assessments to address potential hazards related to areas which were not previously inundated and develop or expand formalized groundwater management plans to guide management of groundwater basins where managed groundwater recharge and/or groundwater banking projects are to occur.

Delta Plan Mitigation Measures 11-5, 11-6, 11-7, 11-8, and 11-9

Delta Plan Mitigation Measure 11-5

1. In areas where expansive clays exist, a hydrogeological/geotechnical investigation shall be performed by a licensed professional engineer or geologist to identify and quantify the potential for expansion, particularly differential expansion of clayey soils due to leakage and saturation beneath new improvements. Measures could include but are not limited to removal and recompaction of problematic expansive soils, soil stabilization, and /or reinforcement of constructed improvements to resist deformation due to expansion of subsurface soils.

Delta Plan Mitigation Measure 11-6

1. For projects that would result in construction of canals, storage reservoirs and other surface impoundments, project design shall provide for protection from leakage to the subsurface. Measures could include but are not limited to rendering concrete less permeable by specifying concrete additives such as bentonite, design of impermeable liner systems, design of leakage collection and recovery systems, and construction of impermeable sub surface cutoff walls.
2. For ecosystem restoration projects that might cause sub surface seepage of nuisance water onto adjacent lands:
 - Perform seepage monitoring studies by measuring the level of shallow groundwater in the adjacent soils, to evaluate the baseline conditions. Continue monitoring for seepage during and after the project implementation.
 - Develop a seepage monitoring plan if subsurface seepage constitutes nuisance water to the adjacent land.
 - Implement seepage control measures if adjacent land is not useable, such as installing subsurface agricultural drainage systems to avoid raising water levels into crop root zones. Cutoff walls and pumping wells can also be used to mitigate for the occurrence of subsurface nuisance water.

Delta Plan Mitigation Measure 11-7

1. For projects that would result in construction of levees, surface impoundments and other fill embankments project design shall incorporate fill placement in accordance with local and State regulations and in accordance with the prevailing standards of care for such work. Measures could include, but are not limited to blending of soils most susceptible to land sliding with soils having higher cohesion characteristics, installation of slope stabilization measures, designing top-of-slope berms or v-ditches, terrace drains and other surface runoff control measures, and designing slopes at lower inclinations.

Delta Plan Mitigation Measure 11-8

1. A geotechnical investigation shall be performed and a geotechnical report prepared. The geotechnical report shall include a quantitative analysis to determine whether on-site soils would be suitable for an on-site wastewater treatment system. If it is determined that the soil could not support a conventional on-site treatment system, non-conventional systems shall be analyzed. Potential alternative systems include (SWRCB, 2011, Onsite Wastewater Treatment System Scoping Document. April 4, 2011. Site accessed September 1, 2011. http://www.swrcb.ca.gov/water_issues/programs/owts/index.shtml):
 - Containment systems that do not generate waste
 - Anoxic and anaerobic systems
 - Attached and suspended growth aerobic treatment systems
 - Natural treatment systems
 - Disinfection systems

- Engineered-fill leach fields
- Monitoring control systems

Delta Plan Mitigation Measure 11-9

1. For projects that would result in significant or potentially significant risk to structures due to the presence of highly organic soils, lead agencies shall require geotechnical evaluation prior to construction to identify measures to mitigate organic soils. The following measures may be considered:
 - Over-excavation and import of suitable fill material
 - Structural reinforcement of constructed works to resist deformation
 - Construction of structural supports below the depth of highly

CVFPP Consistency

Not Applicable.

The CVFPP PEIR does not identify significant impacts to geology and soils related to expansive soils, design features, on-site wastewater treatment systems, or highly organic soils. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Paleontological Resources

Delta Plan Mitigation Measure 12-1

During the project-level analysis, a Paleontological Resources Monitoring and Recovery Plan (PRMRP) shall be developed and implemented for all actions. The PRMRP shall include protocols for paleontological resources monitoring in those areas where sediment with moderate to high paleontological sensitivity would be affected by construction-related excavations. The PRMRP also shall set forth the following procedures:

- Confirming the paleontological sensitivity (high, moderate, or low) of the areas to be impacted through review of project- level geological and geotechnical data
- Determining the qualifications of the paleontologist as established by the Society of Vertebrate Paleontology (SVP) (SVP, 1991. Standard Measures for assessment and mitigation of adverse impacts to nonrenewable paleontological resources. Society of Vertebrate Paleontology News Bulletin 152:2 – 5; SVP, 1995. Assessment and mitigation of adverse impacts to nonrenewable paleontological resources: Standard guidelines. Society of Vertebrate Paleontology News Bulletin 163: 22 – 27; SVP, 1996. Conditions of Receivership for Paleontologic Salvage Collections. Society of Vertebrate Paleontology News Bulletin. Vol. 166, pp. 31 – 32)
- The assessment and recovery of discovered fossil resources
- The preparation and curation of fossil finds

The PRMRP would provide guidelines for the establishment of a yearly or biannual monitoring program led by a qualified paleontologist to determine the extent of fossiliferous sediment being exposed and affected by erosion and determine whether paleontological resources are being lost. If loss of

scientifically significant paleontological resources can be documented, then a recovery program should be implemented

CVFPP Consistency

Consistent.

As a planning document, the CVFPP describes mitigation measures that could be implemented by project proponents. The mitigation measures that are consistent with this Delta Plan mitigation measure are found in Sections 3.10 of the 2012 CVFPP PEIR and include provisions for protection against damages to unknown paleontological resources, and if encountered, a recovery plan.

- Measure GEO-6 (NTMA): *Prepare a Paleontological Resources Assessment and, If Necessary, Conduct Construction Worker Personnel Education, Stop Work If Paleontological Resources Are Encountered during Earthmoving Activities, and Implement Recovery Plan* (page 3.10-48)
- Mitigation Measure GEO-6 (LTMA): *Implement Mitigation Measure GEO-6 (NTMA), "Prepare a Paleontological Resources Assessment and, If Necessary, Conduct Construction Worker Personnel Education, Stop Work If Paleontological Resources Are Encountered during Earthmoving Activities, and Implement Recovery Plan"* (page 3.10-53).

Mineral Resources

Delta Plan Mitigation Measures 13-1 and 13-2

1. Ensure land use compatibility between existing mineral resource extraction activities and projects, activities or actions that may be implemented as the result of the Proposed Project.
2. Maintain adequate buffer between future projects and designated MRZ-2 sectors.
3. Explore opportunities to classify and designate new MRZ-2 sectors (e.g., in existing MRZ-3 sectors) to ensure that important mineral resources are conserved and continue to be available for future construction needs.
4. Ensure future land use changes within designated mineral resource extraction areas recognize mineral resource extraction as a compatible use.
5. Limit use of construction aggregate to local sources with sufficient capacity to meet both project and future local development needs, to the extent possible.
6. Use recycled aggregate where possible, to decrease the demand for new aggregate.
7. Ensure access is maintained to existing, active mineral resource extraction sites both during and after project construction.
8. Implement recommendations identified in the Division of Oil, Gas, and Geothermal Resources of the State Department of Conservation (DOGGR) construction site well review program (DOC, 2007. Well Review Program: Introduction and Application), such as:
 - For all future projects, identify all existing natural gas well sites and oil production facilities within or in close proximity to the project area.
 - Identify any oil and natural gas well within 100 feet of any navigable body of water or watercourse perennially covered by water or any officially recognized wildlife preserve as a "critical well" (California Code of Regulations, Title 14, Chapter 4, Article 2, Section 1720(a)(2)(B) and (C)). The State Department of Conservation (DOC) requires that a "critical

well” include more stringent blowout prevention equipment than non-critical wells based on pressure testing and rating.

- Identify safety measures to prevent unauthorized access to equipment.
- Include safety shut-down devices on oil and natural gas wells and other equipment, as appropriate.
- Notify DOC of new oil and natural gas wells or changes in oil and natural gas well operations or physical conditions, receive written approval from DOC of the changes, and receive written notification of DOC’s inspection of new or changed equipment. The approvals will be primarily related to the ability to: (1) protect all subsurface hydrocarbons and fresh water, (2) protect the environment, (3) use adequate blowout prevention equipment, and (4) use approved drilling and cementing techniques.
- If any plugged/abandoned or unrecorded oil and natural gas wells are uncovered during construction, the DOC should be notified, the wells should undergo remedial well plugging actions, and no structures should be constructed over the abandoned oil and natural gas wells.
- If oil and natural gas wells are under the jurisdiction or a lease from the California State Lands Commission, project proponents should provide additional plans and environmental documentation as required prior to modification of the oil or natural gas wells.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.10 of the 2012 CVFPP PEIR include consideration of a range of locations and configurations of project designs to minimize loss of mineral resources.

- Mitigation Measure GEO-5 (LTMA): *Minimize Loss of Mineral Resources through Siting and Design* (page 3.10-52)

Hazards and Hazardous Materials

Delta Plan Mitigation Measure 14-1

1. Refueling and maintenance of vehicles and equipment to occur only in designated areas that are either bermed or covered with concrete, asphalt, or other impervious surfaces to control potential spills.
2. Refueling of vehicles and equipment to occur only when employees are present.
3. Vehicle and equipment service and maintenance conducted only by authorized personnel.
4. Refueling conducted only with approved pumps, hoses, and nozzles.
5. Catch-pans placed under equipment to catch potential spills during servicing.
6. All disconnected hoses placed in containers to collect residual fuel from the hoses.
7. Vehicle engines shut down during refueling.
8. No smoking, open flames, or welding allowed in refueling or service areas.
9. Refueling performed away from bodies of water to prevent contamination of water in the event of a leak or spill.
10. When refueling is completed, the service truck to leave the project site.

11. Service trucks provided with fire extinguishers and spill containment equipment, such as absorbents.
12. Should a spill contaminate soil, the soil shall be placed in containers and disposed of as appropriate. All containers used to store hazardous materials to be inspected at least once per week for signs of leaking or failure. All maintenance and refueling areas to be inspected monthly. Results of inspections to be recorded in a logbook maintained onsite.
13. Provision of an automatic sprinkler system for indoor hazardous material storage areas.
14. Provision of an exhaust system for indoor hazardous material storage areas.
15. Separation of incompatible materials by isolating them from each other with a noncombustible partition.
16. Spill control in all storage, handling, and dispensing areas.
17. Separate secondary containment for each chemical storage system. The secondary containment is required to hold the entire contents of the tank plus the volume of water for the fire suppression system that could be used for fire protection for a period of 20 minutes in the event of a catastrophic spill. In the unlikely event of a spill, the spill shall be reported to the appropriate regulatory agencies and contaminated soil shall be cleaned, treated, and/or removed in accordance with regulatory requirements. Small spills shall be contained and cleaned up immediately by trained, onsite personnel. Larger spills shall be reported via emergency phone numbers to obtain help from offsite containment and cleanup crews. All personnel working on the project during the construction phase shall be trained in handling hazardous materials and the dangers associated with hazardous materials. An onsite health and safety person shall be designated to implement health and safety guidelines and to contact emergency response personnel and the local hospital, if necessary. If there is a large spill from a service or refueling truck, contaminated soil shall be placed into barrels or trucks by service personnel for offsite disposal at an appropriate facility in accordance with law. If a spill involves hazardous materials quantities equal to or greater than the specific Reportable Quantities as required by regulatory agencies (42 gallons for petroleum products), all federal, State, and local reporting requirements shall be followed. In the event of a fire or injury, the local fire department shall be called.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to the routine use of hazardous materials or accidental spill of hazardous materials. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Delta Plan Mitigation Measure 14-2

1. To reduce the risk due to increased exposure to materials that could be released during soil disturbance, worker training programs and breathing apparatus shall be provided. Monitoring programs shall be implemented as areas are excavated to determine the potential for exposure to soil organisms or other constituents.

2. To reduce risk to the community due to increased exposure to materials that could be released during soil disturbance, public outreach programs shall be conducted to educate the public of the types of construction activities and risks that could occur. In areas near extreme hazards, such as construction in areas with identified petroleum-product pipelines or soils with high concentrations of petroleum products, warning sirens shall be used at construction sites to immediately notify workers and residents. Emergency procedures shall be included in the education and outreach programs for the workers and the community.

CVFPP Consistency

Consistent.

Mitigation measure identified in Section 3.12 of the 2012 CVFPP PEIR include provisions for conducting pre-construction site assessments and database searches to identify potential impacts that could occur from the use of construction equipment at each site. Additionally, construction workers may be trained prior to construction.

- Mitigation Measure HHM-2 (NTMA and LMTA): *Conduct a Site-Specific Analysis to Determine the Proximity of School Sites, Notify and Consult with Affected Schools, and Implement Storm Water Pollution Prevention Plan and Best Management Practices as Required* (page 3.12-25)
- Mitigation Measure HHM-3a (NTMA and LTMA): *Search for Contaminated Sites Potentially Affected by Site-Specific Projects and Avoid Contact with or Clean Up Contaminated Areas* (page 3.12-26)
- Mitigation Measure HHM-3b (NTMA and LTMA): *Locate Oil and Gas Wells and Transmission Lines Potentially Affected by Site-Specific Projects, and Coordinate with Owner/Operators to Avoid Disturbance* (page 3.12-27)
- Mitigation Measure HHM-3c (NTMA and LTMA): *Train Construction Workers on Hazardous Materials, Stop Work Near Contaminated Soils, and Determine and Implement an Avoidance or Cleanup Strategy* (page 3.12-27)

Delta Plan Mitigation Measure 14-3

1. Freshwater habitat management to include water-control-structure management, vegetation management, mosquito predator management, drainage improvements, and other best management practices, and coordination with the DFW and local mosquito and vector control agencies regarding these strategies and specific techniques to help minimize mosquito production.
2. Maintenance of permanent ponds that increase the diversity of waterfowl yet decrease the introduction of vectors through constant circulation of water, vegetation control, and periodic draining of ponds.
3. Tidal management focused on mosquito problems arising from the residual tidal and floodwaters remaining in depressions and cracked ground (Solano County Mosquito Abatement District (SCMAD), 2011. Site accessed February 6, 2011. <http://www.solanomoquito.com>).

4. Avoidance of ponding in tidal marsh habitat or in areas within the waterside of setback levees. Design of ecosystem restoration areas, waterfowl hunting areas, setback levees, parks, canals, and surface water storage facilities to minimize standing water, or use of other me.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.12 of the 2012 CVFPP PEIR include provisions to limit the creation of mosquito habitat which could lead to the spread of vector-borne diseases.

- Mitigation Measure HHM-6 (NTMA and LTMA): *Implement Workplace Precautions against Vector-Borne Diseases and Coordinate with and Support Local Vector Control District Programs* (page 3.12-36).

Delta Plan Mitigation Measure 14-4

1. Avoid creating hazardous wildlife attractants within a distance of 10,000 feet of an Airport Operations Area.
2. Maintain a distance of 5 statute miles between the farthest edge of the Airport Operations Area and hazardous wildlife attractants.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.12 of the 2012 CVFPP PEIR would help reduce the creation of hazardous wildlife attractants within proximity to airports due to coordination with affected airports, as necessary.

- Mitigation Measure HHM-4 (NTMA and LTMA): *Prepare Site-Specific Impact Assessments and, If Necessary, Coordinate with Affected Airport(s) to Prepare and Implement Wildlife Hazard Management Plan(s)* (page 3.12-29)

Delta Plan Mitigation Measure 14-5

Prepare and implement a fire management plan to minimize potential for wildland fires.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to wildland fires. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Noise

Delta Plan Mitigation Measure 15-1

1. Limit the hours of operation at noise-generation sources located near or adjacent to noise-sensitive areas, wherever practicable, to reduce the level of exposure to meet applicable local standards.
2. Locate construction equipment away from sensitive receptors, to the extent feasible, to reduce noise levels below applicable local standards.

3. Maintain construction equipment to manufacturers' recommended specifications and equip all construction vehicles and equipment with appropriate mufflers and other approved noise-control devices.
4. Limit idling of construction equipment to the extent feasible to reduce the time that noise is emitted.
5. Conduct individual traffic noise analysis of identified haul routes and provide mitigation, such as reduced speed limits, at locations where noise standards cannot be maintained for sensitive receptors.
6. Incorporate use of temporary noise barriers, such as acoustical panel systems, between construction activities and sensitive receptors if it is concluded that they would be effective in reducing noise exposure to sensitive receptors.
7. Near sensitive receptors, avoid or minimize use of construction equipment known to generate high levels of groundborne vibration (for example, pile drivers).

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3. 15 of the 2012 CVFPP PEIR are similar to or more protective than those identified in Delta Plan Mitigation Measure 15-1 and include BMPs to reduce construction-related noise.

- Mitigation Measure NOI-1 (NTMA and LTMA): *Implement Noise-Reducing Construction Practices* (page 3.15-30)
- Mitigation Measure NOI-1b (LTMA): *Minimize Construction-Related Traffic Noise* (page 3.15-37).

Delta Plan Mitigation Measure 15-2

1. Conduct a preliminary groundborne vibration analysis report to determine future construction-related groundborne vibration levels based on, but not limited to, a detailed equipment list, hours of operation and distances to sensitive receptors located within 500 feet of project sites.
2. Provided that future groundborne vibration results in significant impacts at sensitive receptors, the following measures shall be implemented:
 - Designate a complaint coordinator and post this person's contact information in a location near construction areas where it is clearly visible to the nearby receptors most likely to be affected. The coordinator will manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the coordinator and, if necessary, evaluated by a qualified noise and vibration control expert.
 - Vibration monitoring will be conducted before and during vibration generating operations occurring within 100 feet of historic structures. Every attempt will be made to limit construction-generated vibration levels during pile driving and other groundborne noise and vibration-generating activities in the vicinity of the historic structures in accordance with recommendations of the appropriate agency with authority.
 - Adjacent historic features will be covered or temporarily shored, as necessary, for protection from vibrations, in consultation with the appropriate cultural resources authority.

- Pile driving required within a 50-foot radius of residences will use alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers). This would reduce the number and amplitude of blows required to seat the pile.
- Pile-driving activities conducted within 285 feet of sensitive receptors will occur during daytime hours to avoid sleep disturbance during evening and nighttime hours.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3. 15 of the 2012 CVFPP PEIR are similar to or more protective than those identified in Delta Plan Mitigation Measure 15-2 and include BMPs to reduce construction-related vibrations.

- Mitigation Measure NOI-2 (NTMA and LTMA): *Implement Vibration-Reducing Construction Practices* (page 3.15-33)

Delta Plan Mitigation Measure 15-3

1. Identify noise-sensitive receptors in the vicinity of project activities and design projects to minimize exposure of sensitive receptors to long-term, operational noise sources (for example, water pumps) to reduce noise levels below applicable local standards.
2. Conduct a preliminary noise analysis report to determine future operation-related noise and distances to sensitive receptors. Provided that future operation-related noise results in significant at sensitive receptors, incorporate into construction design measures such as a structure encasing the new noise generating infrastructure. Materials (masonry brick, metal shed, wood) used to house the infrastructure will be of solid construction and void of gaps at the ground, roof line, and joints. All vents will include acoustically rated louvers.
3. Locate dog parks no closer than 200 feet from the nearest residential property line and at least 75 feet from habitat for noise sensitive wildlife species.
4. Locate parking lots no closer than 65 feet from the nearest residential property line and at least 25 feet from habitat for noise sensitive wildlife species unless a detailed noise study is conducted that determines that placement of parking lots closer than the distances specified above will not result in noise levels that exceed 67 dBA at the nearest residential property line or 60 dBA from noise-sensitive habitat, or appropriate mitigation measures, including permanent noise barriers, can be incorporated to reduce noise levels to equal the ambient noise level or referenced thresholds for residential property and noise sensitive habitat.
5. Locate playing fields no closer than located at least 125 feet from the nearest residential property line and at least 50 feet from habitat for noise-sensitive wildlife species unless a detailed noise study is conducted that determines that placement of playing fields closer than the distances specified above will not result in noise levels that exceed 67 dBA at the nearest residential property line or 60 dBA from noise-sensitive habitat, or appropriate mitigation measures, including permanent noise barriers, can be incorporated to reduce noise levels to equal the ambient noise level or referenced thresholds for residential property and noise sensitive habitat.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3. 15 of the 2012 CVFPP PEIR are similar to or more protective than those identified in Delta Plan Mitigation Measure 15-3 and include using design techniques to reduce operational noise.

- Mitigation Measure NOI-3 (NTMA and LTMA): *Implement Design Techniques to Reduce Operational Noise* (page 3.15-35)

Population and Housing

Delta Plan Mitigation Measure 16-1

1. Require compliance with applicable local policies and regulations regarding the provision of affordable housing.
2. Construct replacement housing if existing housing will be displaced.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to population and housing. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Public Services

Delta Plan Mitigation Measure 17-1

1. Establish construction fee schedules by local agencies for the new or modified facilities to fund additional emergency services potentially required during construction. If emergency services are not needed, a portion of the fees could be refunded.
2. Develop worker training programs to reduce construction and operations risks.
3. Develop appropriate emergency access routes and equipment for both land and water access, if applicable (such as in the Delta), that provides for adequate response time. If use of an existing emergency access route becomes limited due to new or modified facilities, additional routes or placement of duplicate equipment on each side of the route limitation could be considered.
4. Develop traffic plans and emergency response plans for construction and operations phases of new facilities.
5. Develop all facilities, including parks and ecosystem restoration areas, in accordance with applicable fire codes and regulations, and with adequate fire equipment access routes, occupancy limitations, and fire-protection equipment.

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify a significant impact related to public services. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Recreation

Delta Plan Mitigation Measures 18-1 and 18-3

1. If the substantial impairment, degradation, or elimination of recreational facilities occurs, replacement facilities of equal capacity and quality with ongoing funding provided for maintenance of these facilities.
2. If degradation or impairment of recreational facilities, settings, and activities occur from implementation of water use efficient practices and water conservation measures at recreational areas, the park and recreation areas shall be redeveloped with drought-tolerant plant materials, water efficient irrigation systems, and synthetic turf substitutes where appropriate, in such a way as to retain recreational facilities and use areas.
3. If the volume of water exported from the Delta declines over multiple years, the lead agencies that implement local water supplies may be unable to develop a long-term replacement water supply for the south-of-Delta surface water reservoirs with recreation uses. At these sites, facilities must be modified (including access facilities, as necessary) to accommodate lower water elevations or more frequent fluctuations in water elevations that could occur more frequently in the Proposed Project than under existing conditions.
4. Projects shall be sited in areas that would have minimal adverse physical effect on the environment.
5. Where impacts to the environment are unavoidable, compensate for impacts through mitigation, restoration, or preservation off-site or creation of additional permanent new replacement facilities.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.18 of the 2012 CVFPP PEIR include replacing impacted recreational facilities.

- Mitigation Measure REC-1 (NTMA and LTMA): *Replace Displaced Recreational Facilities and Access* (page 3.18-48)
- Mitigation Measure REC-7 (LTMA): *Replace Displaced Recreational Facilities* (page 3.18-58).

Delta Plan Mitigation Measure 18-2

1. If substantial temporary or permanent impairment, degradation, or elimination of recreational facilities causes users to be directed towards other existing facilities, lead agencies shall coordinate with impacted public and private recreation providers to direct displaced users to under-utilized recreational facilities.
2. Lead agencies shall provide additional operations and maintenance of existing facilities in order to prevent deterioration of these facilities.
3. If possible, lead agencies shall provide temporary replacement facilities.
4. If the increase in use is temporary, once use is decreased back to existing conditions, degraded facilities shall be rehabilitated or restored.

5. Where impacts to existing facilities are unavoidable, compensate for impacts through mitigation, restoration, or preservation off-site or creation of additional permanent new replacement facilities.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3. 18 of the 2012 CVFPP PEIR include BMPs to limit impacts to recreational facilities and maintain safe boating practices.

- Mitigation Measure REC-2 (NTMA and LTMA): *Minimize Construction Activities and Staging near Recreational Facilities and Time Such Activities to Avoid the High-Use Recreation Season* (page 3.18-49)
- Mitigation Measure REC-4 (NTMA and LTMA): *Maintain Safe Boat Passage and Provide Appropriate Safety Measures to Minimize Navigation Hazards Associated with Construction Equipment and Activity in Waterways* (page 3.18-52).

Traffic and Transportation

Delta Plan Mitigation Measures 19-1 and 19-4

1. Avoid modifications to federal, State, and county highways, local roadways, and bridges that may reduce vehicle capacity, to the extent feasible.
2. Develop and implement a traffic control plan to reduce effects of roadway construction activities, including full and partial lane closures, bicycle and pedestrian facility closures, and reduced access to adjacent properties. Minimize lane closures during morning and evening peak hours. Limit lane closures near the affected segment. Reroute bicycle and pedestrian access around the project area. Prevent bicyclists and pedestrians from entering the work area.
3. As part of the traffic control plan, identify specific project-vehicle access routes that would avoid additional traffic in residential areas or would adversely affect other sensitive land uses, where feasible.
4. Install roadway status signs at strategic locations in the Delta to inform the public of roadway closures and limits to ingress to/egress from Delta Islands. The signs shall include maps showing the relative locations of road closures and access restrictions to other Delta features.
5. For project operations that increase traffic, prepare a traffic study. Determine haul routes that would be used. Evaluate the levels of service at affected intersections and road segments during the peak a.m. and peak p.m. periods. Model changes in traffic with project traffic. If the level of service is maintained at levels acceptable to the appropriate agency, then no additional mitigation is required. If project traffic causes an intersection or road segment to perform below the minimum level of service standard, then select an alternate route for project traffic or schedule project trips for non-peak-hour periods. If alternate routes are not feasible, then design and construct facility improvements to intersections or road segments to maintain the acceptable level of service.
6. During the planning and analysis of site-specific actions, coordinate with Caltrans and/or other local agencies with jurisdiction over transportation system features for the purpose of minimizing impacts on bridges, roadways, culverts, or other features that may be affected. Agencies responsible for

constructing and maintaining levees on which a public roadway may be located shall also be consulted to ensure consistency with levee design criteria.

7. For roads that will be flooded during floodplain operation, prepare and implement vehicular traffic detour planning as necessary. Provide convenient and parallel vehicular traffic detours for routes closed because of inundation. A detour plan shall be prepared and implemented in accordance with current Caltrans Standard Plans and Specifications. (A temporary crossing structure, for example a Bailey Bridge, may be used to maintain circulation and avoid a detour plan.) The detour plan shall be implemented before roadway inundation. The detour plan will include an assessment of existing roadway conditions, whether paved or unpaved, and provisions for repair and maintenance if the roadway conditions are substantially degraded from increased use. After the detour route is identified and before flood flows are released that would overtop roads, the condition of the detour road surface will be assessed and documented. The documentation will be submitted to the local agency responsible for maintenance of the road. After the detour is no longer needed, the condition of the road surface will be assessed and documented. The documentation will identify substantial changes in the condition of the road surface, such as potholing or rutting. Repair and maintenance actions needed to restore the road surface to pre-detour conditions will be identified. In coordination with the local maintenance agency, the repair and maintenance actions may be conducted by the agency conducting the floodplain operation or by the local maintenance agency to be proportionately reimbursed by the flood management authority.
8. The detour plan will prioritize paved roads for use as detour routes. If use of paved roadway detours is not feasible during flood flow road inundation periods, the detour plan will require that visible dust emissions from unpaved detour routes will be limited to the percent opacity indicated by the appropriate air pollution control district. The following dust control measures may be used to stabilize unpaved roadways:
 - Watering
 - Uniform layer of washed gravel
 - Roadmix
 - Paving

Any other method that can be demonstrated to the satisfaction of the appropriate air pollution control district that effectively limits visible dust emission to the local percent opacity standard and meets the conditions of a stabilized unpaved road.

9. Traffic impact reports shall be prepared that meet the applicable agencies' standards to assess potential impacts on appropriate street segments and intersections. The traffic impact reports shall identify impacts that exceed the agencies' guidelines for significance and identify appropriate mitigation. Acceptable mitigation measures may include:
 - Turn restrictions
 - Roadway widening to add lanes or shoulders
 - Redesign of freeway on- and off-ramps
 - Median construction/modification to restrict access
 - Flaring of intersections to add turn lanes

- Provision of passing lanes or turnouts
 - Acceleration and deceleration lanes
 - Removal of obstructions
 - Roundabouts
 - Restriping to add lanes with or without parking removal and restrictions
 - Protected left-turn pockets or free right-turn lanes
 - Parking restrictions, daily or during peak hours
 - Fair share contributions to approved projects identified in the agency's Capital Improvement Plan
 - Fair share contributions to traffic signals identified in the agency's traffic signal plan
10. Prepare and implement a waterway traffic control plan to ensure safe and efficient vessel navigation during construction in waterways. The plan shall identify vessel traffic control measures to minimize congestion and navigation hazards to the extent feasible. Construction areas in the waterway will be barricaded or guarded by readily visible barriers or other effective means to warn boaters of their presence and restrict access. Warning devices and signage will be consistent with the California Uniform State Waterway Marking System and effective during non-daylight hours and periods of dense fog.
 11. Where temporary partial channel closure is necessary, a temporary channel closure plan shall be developed. The waterway closure plan will identify and implement alternate detour routing and procedures for notifying boaters of construction activities and partial closures, including coordination with the U.S. Coast Guard, local boating organizations and marinas.
 12. To the extent feasible, ensure that safe boat access to public launch and docking facilities, businesses, and residences is maintained.
 13. Coordinate with transit system operators to establish appropriate alternate transit system routes to be rerouted during construction activities, as appropriate.
 14. Boat passage facilities shall be provided as an integral component of operable gate facilities, when feasible. Boat passage facilities shall be designed to provide uninterrupted boat passage when gates are in the "up" position. Floating docks with mooring bits shall be provided along the shoreline on both sides of the boat passage facility for boaters to use while they await passage. Floating barriers will guide boats into the passage facility chambers.
 15. Implement a program to provide boater education on procedures for waiting at and using the boat passage facility.
 16. Minimize impacts on bicycle and pedestrian circulation where feasible by avoiding impacts, minimizing closure of paths, and providing for temporary or permanent relocation of the facility to the extent feasible. Consult with the appropriate public works department to determine the most feasible alignment for facility relocation.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.19 of the 2012 CVFPP PEIR include BMPs such as limiting truck trips and preparation of a traffic management plan to reduce construction-related traffic impacts and provide detours for closures during construction activities.

- Mitigation Measure TRN-1 (NTMA and LTMA): *Implement Measures to Reduce Construction Traffic* (page 3.19-19)
- Mitigation Measure TRN-2 (NTMA and LTMA): *Provide Detours for Closed or Disrupted Routes* (page 3.19-20)

Delta Plan Mitigation Measure 19-2

Develop and implement a program that will include procedures for routine inspections and emergency facility operation to allow safe navigation should the facility become damaged or malfunction. The program will include the following specific components:

- Routine inspections and correction procedures to ensure that facility safety features are in good working order.
- Routine inspections and correction procedures for navigational hazards around facilities, including floating or submerged debris and the formation of shoals.
- Contingency and emergency operating procedures to address the possibility that a boat colliding with the flow control facilities will damage the facilities or otherwise render them unable to operate as engineered, and provisions to allow safe navigation.

CVFPP Consistency

Not Applicable.

The CVFPP does not include work or facilities that would interfere with boating or navigation. Mitigation measures are not required. Therefore, the CVFPP does not include comparable mitigation measures.

Delta Plan Mitigation Measure 19-3

1. Coordinate with responsible local agencies to establish appropriate emergency routes during construction activities and before existing emergency routes are reclassified to a nonemergency route use.
2. Phase construction activities and use multiple routes to and from offsite locations to minimize the daily amount of traffic on individual roadways.
3. Post warnings about the potential presence of slow-moving vehicles.
4. Use traffic-control personnel when appropriate.
5. Place and maintain barriers, and install traffic-control devices necessary for safety, as specified in Caltrans' Manual of Traffic Controls for Construction and Maintenance Work Zones and in accordance with city and county requirements.
6. Notify appropriate emergency service providers of project construction throughout the construction period to ensure that

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.19 of the 2012 CVFPP PEIR include consultation with emergency response agencies prior to construction to determine potential impacts to emergency and evacuation routes, and as needed, implement measures such as enabling nighttime work and maintaining emergency routes during periods of high use to limit impacts.

- Mitigation Measure TRN-4 (NTMA and LTMA): *Minimize Effects of Reduction or Closure of an Emergency Response or Evacuation Route* (page 3.19-21)

Utilities and Service Systems

Delta Plan Mitigation Measure 20-1

1. Establish construction debris disposal fee schedules to promote recycling and minimize solid waste.
2. Limit disposal of construction debris and other solid waste at local landfills if the landfills have limited capacity.
3. Dispose of all construction debris at landfills and disposal facilities that are licensed for the type of wastes to be disposed. If the landfills and disposal facilities are not located near future construction sites, include analysis of transportation of solid waste in future environmental documentation for specific projects.
4. Require construction contractors to prepare construction debris management plans and require reuse or recycling of construction debris.
5. Develop project-specific solid waste plans to maximize practices that reduce and recycle solid waste and sludge generated by water, wastewater, and stormwater treatment facilities; and collect, recycle, or compost litter and solid waste generated at new facilities designed for visitor use (such as parks and visitor centers).

CVFPP Consistency

Not Applicable.

The CVFPP PEIR did not identify significant impacts related to solid waste disposal. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.

Delta Plan Mitigation Measure 20-2

Relocate or modify existing water, wastewater, and stormwater facilities or electricity transmission systems in a manner that does not affect current operational reliability to existing and projected users.

Coordinate utility relocation and modification with utility providers and local agencies to integrate potential other construction projects and minimize disturbance to the communities.

Verify utility locations through field surveys and services such as Underground Service Alert.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.20 of the 2012 CVFPP PEIR include BMPs to reduce potential impacts to utilities, including coordination with utility providers and conduct worker training prior to construction to avoid utility damage.

- Mitigation Measure UTL-1 (NTMA and LTMA): *Verify Utility Locations, Coordinate with Utility Providers, Prepare and Implement a Response Plan, and Conduct Worker Training with Respect to Accidental Utility Damage* (page 3.20-15)

Climate Change and GHG Emissions

Delta Plan Mitigation Measure 21-1

Implement measures from CAPCOA, BAAQMD, or air district guidance, or from the Attorney General's list of measures.

CVFPP Consistency

Consistent.

Mitigation measures identified in Section 3.7 of the 2012 CVFPP PEIR include BMPs to reduce construction- and operations-related GHG production.

- Mitigation Measure CLM-1a (NTMA and LTMA): *Implement Greenhouse Gas– Reducing Construction BMPs* (page 3.7-50)
- Mitigation Measure CLM-1b (NTMA): *Implement Greenhouse Gas– Reducing Operational Practices* (page 3.7-52)

Delta Plan Mitigation Measures 21-2, 21-3, and 21-4

1. Prepare a drainage or hydrology and hydraulics study that would assess the need and provide a basis for the design for flood protection of the facilities constructed along waterways. Prepare the study in accordance with applicable standards of Federal Emergency Management Agency (FEMA), USACE, DWR, Central Valley Flood Protection Board, San Francisco Bay Conservation and Development Commission (BCDC), as well as the local reclamation districts and flood control agencies and the counties and cities. Design subsequent mitigation measures in accordance with the final study and with the applicable standards of FEMA, USACE, DWR, Central Valley Flood Protection Board, and BCDC.
2. Design intakes/diversions and outfalls to be operated at multiple surface water elevations between existing conditions and maximum projected surface water elevations during a high flow event with sea level rise for the life of the facility.
3. Prepare a hydrogeologic study that would assess long-term groundwater recharge and safe yield of wells and wellfields under a sustainable groundwater management plan. If the wells can be used to a greater degree in some years in a manner that would support the sustainable groundwater management plan to avoid long-term groundwater overdraft, wells could be drilled to deeper depths than would be required under existing conditions.
4. Based on the results of the drainage or hydrologic and hydraulic study, arrange the length of flood management facilities in the direction of the floodplain flow to maximize surface flows under flood conditions.
5. Install setback levees or bypass channels to maintain channel capacity and to mitigate hydraulic impacts of high flow events and higher surface water elevations due to climate change and sea level rise.

6. Channel modifications for restoration actions would be required to be implemented to maintain or improve flood management functions and would be coordinated with the USACE, DWR, Central Valley Flood Protection Board, BCDC, and other flood control agencies to assess the desirability and feasibility for channel modifications. To the extent consistent with floodplain land uses and flood control requirements, if applicable, woody riparian vegetation would be allowed to naturally establish.

CVFPP Consistency

Not Applicable.

The 2012 CVFPP PEIR and 2022 Addendum to the CVFPP PEIR did not identify significant impacts related to climate change adaptation, although the CVFPP 2022 Update focused on DWR's response to climate change adaptations. Therefore, mitigation measures for these impacts would not apply to the CVFPP. Consequently, the CVFPP does not include comparable mitigation measures.