

Mitigation Measure Comparison for the American River Watershed Common Features (ARCF) Water Resource Development Act 2016 Project, Sacramento River East Levee Contract 4

This table presents a “crosswalk” between Delta Plan Mitigation Measures and the Project-specific Environmental Commitments and/or Mitigation Measures which demonstrate compliance with or effective substitution for, the Delta Plan Mitigation Measures. Included below are sections of the American River Common Features General Reevaluation Report EIS/EIR (ARCF GRR EIS/EIR) and Sacramento River East Levee Contract 4 Supplemental EIR/Environmental Assessment (SREL C4 SEIR/EA). Descriptions are included where the SREL C4 SEIR/EA identified potential for significant impacts and proposed mitigation measures.

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). This includes:

- American River Watershed Common Features, Water Resources Development Act of 2016 Project, Sacramento River East Levee Contract 4 Supplemental Environmental Impact Report/Environmental Assessment (SREL C4 SEIR/EA)
- Sacramento River East Levee Improvement Project (SRELIP) Alternatives Evaluation – Summary Memorandum.

Other supporting documents are available from the US Army Corps of Engineers website at Sacleveeupgrades.com. This includes:

- American River Watershed Common Features General Reevaluation Report Final Environmental Impact Statement/Environmental Impact Report (GRR EIS/EIR). Available at: https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF_GRR_Final_EIS-EIR_Jan2016.pdf
- American River Common Features General Reevaluation Report, Appendix I - Habitat Mitigation, Monitoring, and Adaptive Management Plan. https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF_GRR_EIS-EIR_Appendices.pdf
- American River Common Features General Reevaluation Report, Appendix A - Fish and Wildlife Coordination Act Report. https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF_GRR_EIS-EIR_Appendices.pdf
- American River Watershed Common Features Chief's Report. https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF_Draft_%20Chief_Report_Jan2016.pdf
- American River Watershed Common Features 2016 Project Beach Stone Lakes Mitigation Site Supplemental Environmental Assessment Supplemental Initial Study. Available at:

https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/WRDA16/ARCF-2016-BSLMS_FinalSEA-IS_Jun2019.pdf?ver=2019-07-26-114134-363

- Endangered Species Act Section 7(a)(2) Biological Opinion, and Magnuson-Stevens Fishery Conservation and Management Act Essential Fish Habitat Response, for the American River Common Features General Reevaluation Report (Common Features GRR). Sacramento, California.
https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF_GRR_EIS-EIR_Appendices.pdf
- Formal Consultation of the American River Common Features (AFRC) Project. Sacramento County, California.
https://www.spk.usace.army.mil/Portals/12/documents/civil_works/CommonFeatures/ARCF_GRR_EIS-EIR_Appendices.pdf

Aesthetics

Delta Plan Mitigation Measure 5.2-1

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

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The project 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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

1, 2, 3, 5, 6: USACE would implement mitigation measures in Sections 3.2.6 and 3.5.6 of the GRR EIS/EIR (consolidated in the SREL C4 SEIR/EA on pages 74-76 and 84 in Mitigation Measures HWQ-1: *Obtain Appropriate Discharge and Dewatering Permit and Implement Provisions for Dewatering* and Mitigation Measure GEO-1: *Acquire Appropriate Regulatory Permits and Prepare and Implement a Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasures Plan*.

The requirements include obtaining coverage under the State Water Resources Control Board (SWRCB) NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ), and preparation and submittal of a project-specific SWPPP at the time the NOI to discharge is filed. Additionally, USACE will obtain a Low Threat Discharge and Dewatering NPDES permit or an Individual Permit from the Central Valley RWQCB if the dewatering is not covered under the RWQCB's NPDES Construction General Permit. The dewatering permit will include water quality monitoring to adhere to the effluent and receiving water quality criteria outlined in the permit. As part of the permit, the permittee will design and implement measures as necessary to meet the discharge limits identified in the relevant permit. The measures include BMPs comparable to those identified in Delta Plan Mitigation Measure 3-1.

- 4: No mercury/selenium exposure is identified as part of the project.

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.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The project site is located within an urban area with public water service and there are no adjacent groundwater wells. The SREL C4 SEIR/EA did not identify a significant impact related to groundwater.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

1, 2, 3: USACE would implement mitigation measures in Sections 3.2.6, 3.5.6, and 3.6.6 of the GRR EIS/EIR (consolidated in the SREL C4 SEIR/EA on pages 45 and 84 in Mitigation Measure VEG-1: *Compensate for Riparian Habitat Removal*, Mitigation Measure GEO-1: *Acquire Appropriate Regulatory*

Permits and Prepare and Implement a Storm Water Pollution Prevention Plan, Spill Prevention Control and Countermeasures Plan, and Associated Best Management Practices and Mitigation Measure HWQ-1: Obtain Appropriate Discharge and Dewatering Permit and Implement Provisions for Dewatering. The requirements for GEO-1 include obtaining coverage under the State Water Resources Control Board (SWRCB) NPDES stormwater permit for general construction activity (Order 2009-0009-DWQ), and preparation and submittal of a project-specific SWPPP at the time the NOI to discharge is filed. Additionally, USACE will obtain a Low Threat Discharge and Dewatering NPDES permit or an Individual Permit from the Central Valley RWQCB if the dewatering is not covered under the RWQCB's NPDES Construction General Permit. The dewatering permit will include water quality monitoring to adhere to the effluent and receiving water quality criteria outlined in the permit. As part of the permit, the permittee will design and implement measures as necessary to meet the discharge limits identified in the relevant permit. The measures include BMPs comparable to those identified in Delta Plan Mitigation Measure 3-1. The requirements for VEG-1 include compensation for riparian habitat at a ratio of 2:1.

4. As described in the SEIR/EA, after construction is complete, disturbed areas will be reseeded with native vegetation to promote revegetation and minimize soil erosion. Vegetation will be established in the impact area below the OHWM prior to rewetting of the area. Activity below the OHWM may be subject to additional requirements of the NMFS BO.

5. The project would not result in the conversion of woodlands.

6: The GRR/EIS EIR did not identify a significant impact related to the potential to establish invasive species; furthermore, mitigation contained in Section 3.6.6 of the GRR/EIS EIR would require replanting with native vegetation.

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).

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

- 1: The project site is determined based on the location of the necessary levee improvements.
- 2-7: Mitigation measures in the GRR EIS/EIR and SREL C4 SEIR/EA address avoidance, minimization, and compensation for impacts on special-status species. Specific mitigation measures from the SREL C4 SEIR/EA (and consistent with the GRR EIS/EIR) that comprehensively address these required elements of Delta Plan Mitigation Measure 4-2 include: Mitigation Measure VEG-1: *Compensate for Riparian Habitat Removal* (page 45), Mitigation Measure PLANT-1: *Implement Measures to Protect Special-status Plants* (page 49), Mitigation Measure VELB-1: *Implement Current USFWS Avoidance, Minimization, and Compensation Measures for Valley Elderberry Longhorn Beetle* (page 50), Mitigation Measure BUOW-1: *Implement Measures to Protect Burrowing Owl* (page 51), Mitigation Measure BIRD-1: *Implement Measures to Protect Nesting Special-Status and Migratory Birds* (pages 51-52), Mitigation Measure BAT-1: *Implement Measures to Protect Maternity Roosts of Special-Status Bats* (pages 52-53), and Mitigation Measure FISH-1: *Implement Limits for In-Water Work* (pages 53). These mitigation measures identify survey requirements, activity windows, buffers, monitoring, and habitat replacement consistent with the BOs (USFWS 2021 and NMFS 2021) and the general requirements outlined in Delta Plan Mitigation Measure 4-2.

Similar mitigation measures are also described in detail in the GRR EIS/EIR within Sections 3.6, 3.7, and 3.8.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

1. The project site is determined based on the location of the necessary levee improvements.
- 2-4: Mitigation Measure VEG-1: *Compensate for Riparian Habitat Removal* on page 45 and Mitigation Measure FISH-1: *Implement Limits for In-Water Work* on page 53, in the SREL C4 SEIR/EA (and consistent with the GRR EIS/EIR, see Sections 3.6, 3.7 and 3.8) would comprehensively address these items.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

1. The project would not affect wetland habitat used by migratory waterfowl or shorebirds.
2. See the determination above under Delta Plan Mitigation Measures 4-2 and 4-3, which describes mitigation measures that would be implemented to compensate for habitat losses.
3. The project does not include work related to any diversions or in-water barriers.
4. See the determination above under Delta Plan Mitigation Measure 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.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

Sacramento's tree ordinance exempts tree removal associated with flood risk reduction activities.

Delta Flood Risk

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

The SREL C4 SEIR/EA did not identify significant impacts related to flood risk. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The GRR EIS/EIR and the SREL C4 SEIR/EA did not identify a significant impact related to flood risk.

Land Use

Delta Plan Mitigation Measure 6-1 and 6-2

The SREL C4 SEIR/EA 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 SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The GRR EIS/EIR identified significant impacts related to the need to purchase easements along the Sacramento River East Levee. However, the mitigation measures identified in the Delta Plan pertain to division of existing communities and compensation for loss in environmental values, which are not significant impacts of the project.

Agriculture and Forestry Resources

Delta Plan Mitigation Measure 7-1 and 7-2

The SREL C4 SEIR/EA did not identify significant impacts to agricultural uses. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to agricultural uses for levee improvements. Although the Beach-Stone Lake mitigation site is located on agricultural land, a groundwater well being installed as part of that project would improve productivity of agricultural operations on the balance of the parcel, resulting in a less-than-significant impact (BSLMS SEA/IS, p. 31-32).

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

The GRR EIS/EIR and the SREL C4 SEIR/EA identified significant impacts related to the conversion of riparian woodland along the Sacramento River. Mitigation identified in Section 3.6.6 of the GRR EIS/EIR (and consolidated as in the SEIR/EA on page 45) as Mitigation Measure VEG-1: *Compensate for Riparian*

Habitat Removal, requires reducing impacts on vegetation and wildlife to the extent practicable, and where avoidance is not possible, mitigation for woodland impacts at a 2:1 ratio.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

1. The GRR EIS/EIR and SEIR/EA identified significant impacts related to the conversion of riparian woodland along the Sacramento River. Mitigation identified in Section 3.6.6 of the GRR EIS/EIR (and consolidated as in the SEIR/EA on page 45) as Mitigation Measure VEG-1: *Compensate for Riparian Habitat Removal*, requires reducing impacts on vegetation and wildlife to the extent practicable and where avoidance is not possible, mitigation for woodland impacts at a 2:1 ratio.
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. If property acquisition is needed, all property acquisitions would be conducted in compliance with Federal and State relocation law requiring appropriate compensation.

Visual Resources

Delta Plan Mitigation Measure 8-1 and 8-2

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.
12. 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.
13. 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.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The GRR EIS/EIR and SREL C4 SEIR/EA identified significant and unavoidable temporary impacts on visual character. However, construction and work areas would temporary, and the visibility from scenic vistas or designated scenic roads/highways would occur over only a single season. The measures identified in the Delta Plan Mitigation Measures 8-1 and 8-2 include measures meant to address structures and new facilities, none of which will be constructed as part of the SREL C4 project. Trees removed as part of the project would be mitigated for through riparian mitigation at the Beach-Stone Lakes mitigation site (see USACE 2019); replanting of large trees on the levee crown would not be consistent with USACE

vegetation requirements and is infeasible. There are no feasible mitigation measures to reduce these impacts, consistent with the ARCF GRR Final EIS/EIR.

Delta Plan Mitigation Measure 8-3

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

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify significant temporary impacts related to light and glare.

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

14. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
15. All haul trucks transporting soil, sand, or other loose material offsite shall be covered.
16. 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.
17. All vehicle speeds on unpaved roads shall be limited to 15 mph.
18. 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.
19. 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.
20. 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.
21. 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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

The GRR EIS/EIR and SREL C4 SEIR/EA identified significant air emissions impacts. Mitigation measures identified in Section 3.11.6 of the GRR EIS/EIR would reduce the impact on air quality to a less-than-significant level. These mitigation measures are consolidated in the SREL C4 SEIR/EA on pages 38 to 41 into Mitigation Measures AIR-1: *Implement the Sacramento Metropolitan Air Quality Management District's Basic Construction Emission Control Practices*; Mitigation Measure AIR-2: *Implement the Sacramento Metropolitan Air Quality Management District's Enhanced Fugitive PM Dust Control Practices*; Mitigation Measure AIR-3: *Require Lower Exhaust Emissions for Construction Equipment*, and Mitigation Measure AIR-4: *Use the Sacramento Metropolitan Air Quality Management District's Off-Site Mitigation Fee to Reduce NOx Emissions*.

These mitigation measures are based on SMAQMD requirements and guidance and address use of newer engines with better emissions controls (minimum 90% Tier 4), minimizing idling, and dust control measures similar to those in Delta Plan Mitigation Measure 9-1.

Delta Plan Mitigation Measure 9-2 and 9-3

The SREL C4 SEIR/EA did not identify significant impacts related to odors or emissions of air contaminants affecting sensitive receptors. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to odors or emissions of air contaminants affecting sensitive receptors.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

1-5 and 7: As described in the SREL C4 SEIR/EA, surveys have been conducted in accordance with Section 106 of the National Historic Preservation Act. Mitigation measures required to be implemented as part of the project are similar to or more protective than those identified in 1-5 and 7. These mitigation measures are identified in Section 3.9.6 of the GRR EIS/EIR and are expanded in the SREL C4 SEIR/EA, on pages 68 to 71, as Mitigation Measure CR-1: *Resolve Adverse Effects through Programmatic Agreement and Historic Properties Treatment Plan (HPTP)*, Mitigation Measure CR-2: *Prepare an Archaeological Discovery Plan and an Archaeological Monitoring Plan*, Mitigation Measure CR-3: *Conduct Cultural Resources Awareness Training*, and Mitigation Measure CR-4: *Implement Procedures for Inadvertent Discovery of Cultural Material*. The SREL C4 SEIR/EA also includes Mitigation Measure CR-5: *In the Event that Tribal Cultural Resources are Discovered Prior to or During Construction, Implement Procedures to Evaluate Tribal Cultural Resources and Implement Avoidance and Minimization Measures to Avoid Significant Adverse Effects*.

6: There would be no work in the wetted channel of the Sacramento River as part of the project. As described in the SREL C4 SEIR/EA, cultural resources surveys and inventories have been conducted in accordance with Section 106 of the National Historic Preservation Act. If other resources are encountered during construction, they will be addressed in accordance with the PA, as described in the discussion for Item 7.

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 reburial 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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

The GRR EIS/EIR requires compliance with state and Federal laws related to human remains in Section 3.9.1. These requirements are expanded in the SREL C4 SEIR/EA pages 71 to 72, in Mitigation Measure CR-6: *Implement Procedures for Inadvertent Discovery of Human Remains*.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

As described in the SREL C4 SEIR/EA, surveys have been conducted in accordance with Section 106 of the National Historic Preservation Act. The SREL C4 SEIR/EA did not identify a significant impact related to built-environment cultural resources.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

See the response above under Delta Plan Mitigation Measures 10-1 and 10-3.

Geology and Soils

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

The SREL C4 SEIR/EA did not identify significant impacts related to Alquist-Priolo Special Studies Zone, seismic activities, and liquefaction. Additionally, the SREL C4 project does not include construction of wells, surface reservoirs, or canals. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to seismic hazards, including soil liquefaction and subsidence.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

See the response above under Delta Plan Mitigation Measure 3-1.

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

The SREL C4 SEIR/EA did not identify significant impacts related expansive soils, landsliding or soil stability, design features, on-site wastewater treatment systems, or highly organic soils. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to soil hazards.

Paleontological Resources

Delta Plan Mitigation Measure 12-1

The SREL C4 SEIR/EA did not identify significant impacts related paleontological resources. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to paleontological resources.

Mineral Resources

Delta Plan Mitigation Measure 13-1 and 13-2

The SREL C4 SEIR/EA did not identify significant impacts related mineral resources. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to mineral resources.

Hazards and Hazardous Materials

Delta Plan Mitigation Measure 14-1

The SREL C4 SEIR/EA did not identify significant impacts related to the routine use of hazardous materials. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The GRR EIS/EIR and SREL C4 SEIR/EA did not identify a significant impact related to the routine use of hazardous materials. The project would comply with state and federal regulations related to materials handling but Delta Plan Mitigation Measure 14-1 does not apply to the project.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Phase I ESAs conducted for the project site did not identify potential RECs that would warrant special worker training, use of breathing apparatus, or specific outreach. Nevertheless, there is a potential that earthmoving activities associated with project activities could encounter contaminated soil or groundwater, and/or underground utility infrastructure containing hazardous substances, which could possibly expose people or the environment to hazardous materials. Mitigation included in Section 3.17.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA on page 79, as Mitigation Measure HAZ-1:

Conduct Phase II Investigations as Needed would require that Project Areas be tested for contaminants prior to construction. Any hazardous materials found would be disposed of in accordance with all Federal, State, and local regulations at an approved disposal site.

Delta Plan Mitigation Measure 14-3

The SREL C4 SEIR/EA did not identify significant impacts related to mosquito management due to creation or alteration of any freshwater habitat as a result of the project, or the spread of vector-borne diseases. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The project does not involve the creation or alteration of any freshwater habitat.

Delta Plan Mitigation Measure 14-4

The SREL C4 SEIR/EA did not identify significant impacts related to hazardous wildlife attractants near airports. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The project does not involve the creation of any new habitats that would qualify as hazardous wildlife attractants within 10,000 feet of an Airport Operations Area.

Delta Plan Mitigation Measure 14-5

The SREL C4 SEIR/EA did not identify significant impacts related to wildfires. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The project is located in an urban area and is not within a very high fire hazard severity zone or a State Responsibility Area.

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).

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Mitigation measures included in Section 3. 13.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA on pages 87 to 89, as Mitigation Measure NOI-1: *Implement Measures to Reduce Construction Noise and Vibration Effects* are similar to or more protective than those identified in Delta Plan Mitigation Measure 15-1.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Mitigation measures included in Section 3. 13.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA on pages 87 to 89, as Mitigation Measure NOI-1: *Implement Measures to Reduce Construction Noise and Vibration Effects* are similar to or more protective than those identified in Delta Plan Mitigation Measure 15-2.

Delta Plan Mitigation Measure 15-3

The SREL C4 SEIR/EA did not identify significant impacts related to operational noise. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant operational noise impact.

Population and Housing

Delta Plan Mitigation Measure 16-1

The SREL C4 SEIR/EA did not identify significant impacts related to population and housing. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to population and housing.

Public Services

Delta Plan Mitigation Measure 17-1

The SREL C4 SEIR/EA did not identify significant impacts related to public services. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to public services.

Recreation

Delta Plan Mitigation Measure 18-1

The SREL C4 SEIR/EA did not identify significant long-term impacts on recreation. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The GRR EIS/EIR and SREL C4 SEIR/EA did not identify a significant long-term impact on recreation.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Mitigation measures included in Section 3. 14.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA, on pdf pages 92 to 93, as Mitigation Measure REC-1: *Implement Bicycle and Pedestrian Detours, Provide Construction Period Information on Facility Closures, and Coordinate with the City of Sacramento to Repair of Damage to Bicycle Facilities.*

Delta Plan Mitigation Measure 18-3

The SREL C4 SEIR/EA did not identify significant impacts long-term impacts on recreation. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant long-term impact on recreation.

Traffic and Transportation

Delta Plan Mitigation Measure 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 predetour 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 nondaylight 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 gate 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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Mitigation measures included in Section 3.10.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA on pages 97 to 98, into Mitigation Measure TR-1: *Prepare and Implement a Traffic Control and Road Maintenance Plan* would require implementation of a traffic control and road maintenance plan.

Delta Plan Mitigation Measure 19-2

The SREL C4 SEIR/EA did not identify significant impacts related to boating or navigation. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The project does not include work or facilities within the waters of the Sacramento River and would not interfere with boating or navigation. Closure of boat ramps would be addressed as above in the discussion under 18-2.

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 emergency access through construction areas is maintained.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Mitigation measures included in Section 3.10.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA on pages 97 to 98, into Mitigation Measure TR-1: *Prepare and Implement a Traffic Control and Road Maintenance Plan* would require implementation of a traffic control and road maintenance plan.

Utilities and Service Systems

Delta Plan Mitigation Measure 20-1

The SREL C4 SEIR/EA did not identify significant impacts related to solid waste disposal. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to solid waste disposal.

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

Mitigation identified in Section 3.16.6 of the GRR EIS/EIR and consolidated in the SREL C4 SEIR/EA as Mitigation Measure UTL-1: *Verify Utility Locations, Coordinate with Affected Utility Owners/Providers, Prepare and Implement a Response Plan, and Conduct Worker Training with Respect to Accidental Utility Damage* on pages 99 to 100 would implement measures before construction begins to avoid and minimize potential damage to utilities, infrastructure, and service disruptions during construction

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.

Sacramento River East Levee Contract 4 Project Consistency

Consistent.

The GRR EIS/EIR and SREL C4 SEIR/EA identified significant GHG emissions impacts. Mitigation identified in Sections 3.11.6 and 3.12.6 of the GRR EIS/EIR and consolidated on page 55 to 56 and 38 to 41 of the SREL C4 as Mitigation Measure GHG-1: *Implement GHG Reduction Measures*, Mitigation Measure AIR-1: *Implement the Sacramento Metropolitan Air Quality Management District's Basic Construction Emission*

Control Practices, Mitigation Measure AIR-2: Implement the Sacramento Metropolitan Air Quality Management District's Enhanced Fugitive PM Dust Control Practices, Mitigation Measure AIR-3: Require Lower Exhaust Emissions for Construction Equipment, and Mitigation Measure AIR-4: Use the Air District's Off-site Mitigation Fee to Reduce NOx Emissions.

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

The SREL C4 SEIR/EA did not identify significant impacts related to climate change adaptation. Therefore, mitigation measures for these impacts would not apply to the SREL C4 project. Consequently, the SREL C4 SEIR/EA does not include comparable mitigation measures.

Sacramento River East Levee Contract 4 Project Consistency

Not Applicable.

The SREL C4 SEIR/EA did not identify a significant impact related to climate change adaptation.