

Delta Plan Mitigation Measure #	Delta Plan Mitigation Measure	BALMD Project Consistency
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### Mitigation Measure Comparison for the Sacramento River Erosion Control and Habitat Enhancement Project

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 Sacramento River Erosion Control and Habitat Enhancement Project Initial Study/Mitigated Negative Declaration. Descriptions are included where the BALMD Project Initial Study/Mitigated Negative Declaration (BALMD IS/MND) 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 including:

- Final Adopted Initial Study for the Brannan-Andrus Levee Maintenance District Sacramento River Erosion Control and Habitat Enhancement Project (<http://balmd.org/announcements-levee-maintenance-district.html>)
- BALMD Sac Erosion Project Planting and Monitoring Plan\_10122020

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Aesthetics (from Delta Plan Amendment)		
5.2-1	Not applicable. The project does not include any transmission or distribution lines.	Consistent. The project does not include any transmission or distribution lines.
Water Resources		
3-1	<p>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):</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• All concrete washing and spoils dumping shall occur in a designated location.</li> <li>• Construction stockpiles shall be covered in order to prevent blowoff or runoff during weather events.</li> <li>• Severe weather event erosion control materials and devices shall be stored onsite for use as needed.</li> <li>• Soil stabilization, sediment control, wind erosion control, tracking control, non-storm water management, and waste management/materials pollution control.</li> </ul> <p>2. Apply other BMPs as determined necessary by the regulating entity (city, county).</p> <p>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.</p> <p>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.</p> <p>For any construction activities with the potential to cause in-river sediment disturbance associated with construction:</p> <p>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.</p> <p>6. Apply bank stabilization BMPs, as needed, for any in-channel disturbance, such as:</p> <ul style="list-style-type: none"> <li>• A 100-foot vegetative or engineered buffer shall be maintained between the construction zone and surface water body.</li> <li>• 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.</li> </ul> <p>Dredging would be particularly prone to the production of re-suspended sediment and contaminants, but potential impacts could be reduced, but not necessarily fully mitigated through the use of submerged dredge cutter heads, silt curtains, and cofferdams, depending upon the site-specific soil conditions in the channel.</p>	<p>Consistent.</p> <p>1-6: BALMD would implement avoidance and minimization measures (AMM's) in Section 2.3.11 of the BALMD IS/MND AMM 3: Construction Best Management Practices (BMPs) and Monitoring; AMM 4: Implementation of General Permit for Storm water Discharges Associated with Construction Activities which includes implementing all measures described in the State Water Resources Control Board National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (General Permit; Order No. 2009-0009-DWQ/NPDES Permit No. CAS000002). This would include preparation of a SWPPP that shall include specific BMPs to avoid and minimize impacts on water quality during construction activities the measures include BMPs comparable/as effective to those identified in Delta Plan Mitigation Measure (MM) 3-1.</p> <p>No dredging is proposed.</p>
3-2	Not applicable. There are no adjacent groundwater wells in the vicinity of the project.	Consistent. The project site is located along the bank of the Sacramento River. There are no adjacent groundwater wells.

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Biological Resources		
4-1	<ol style="list-style-type: none"> <li>Avoid, minimize, and compensate for reduction in area and/or habitat quality of sensitive natural communities, including wetlands, by doing the following: <ul style="list-style-type: none"> <li>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.</li> <li>Design, to the extent practicable, project elements to avoid effects on sensitive natural communities.</li> <li>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.</li> <li>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).</li> </ul> </li> <li>Implement advanced mitigation planning for ecosystem restoration prior to construction.</li> <li>Implement construction best management practices, including: <ul style="list-style-type: none"> <li>Developing and implementing a Stormwater Pollution Prevention Plan (SWPPP).</li> <li>Minimizing soil disturbance, erosion, and sediment runoff from project site.</li> <li>Avoiding and minimizing contaminant spills.</li> <li>Minimizing visual and noise disturbance from construction activities.</li> <li>Conducting biological construction monitoring to ensure that implemented BMPs are effective.</li> </ul> </li> <li>Restore areas temporarily affected by construction activities, including: <ul style="list-style-type: none"> <li>Preparing restoration plan for temporary impacts sites for review by resource agencies.</li> <li>Minimizing soil disturbance and stockpiling topsoil for later use in any areas to be graded.</li> <li>Decompacting or amending soil if necessary before planting and use native species for revegetation.</li> <li>Restoring natural communities with similar or improved function from communities that were affected.</li> </ul> </li> <li>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: <ul style="list-style-type: none"> <li>Conserve oak woodlands, through the use of conservation easements.</li> <li>Plant an appropriate number of trees, including maintaining plantings and replacing dead or diseased trees.</li> <li>Contribute funds to the Oak Woodlands Conservation Fund, as established under subdivision (a) of section 1363 of the Fish and Game Code.</li> </ul> </li> <li>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: <ul style="list-style-type: none"> <li>Nonnative species eradication methods (if eradication is feasible).</li> <li>Nonnative species management methods.</li> </ul> </li> </ol>	<p>Consistent.</p> <p>1, 2. The project has been designed to avoid natural communities to the extent possible, but there would be some impacts on riparian habitats, as described in the BALMD IS/MND. Overall, the project will mitigate for habitat impacts on-site with further habitat lift provided by additional acreages of enhancement habitat created on the constructed waterside benches. BALMD would implement avoidance and minimization measures (AMM's) in Section 2.3.11 of the BALMD IS/MND. AMM 5: Vegetation Removal and Tree Protection, along with MM BIO-1: Special Status Plants Avoidance. See the determination above under 3-1, which describes mitigation actions related to construction BMPs to minimize erosion and sedimentation.</p> <p>3. The BALMD has developed a Planting and Monitoring Plan which describes planting and seeding of the project area with ecologically appropriate native grasses for all disturbed areas following construction.</p> <p>4. See responses above and Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.</p> <p>5. See responses above and Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.</p> <p>6. The BALMD IS/MND did not identify a significant impact related to the potential to establish invasive species. Furthermore, the Planting and Monitoring Plan requires replanting with native species, and maintenance actions to reduce the presence of invasive species.</p>

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	<ul style="list-style-type: none"> <li>• Early detection methods.</li> <li>• Notification requirements.</li> <li>• Best management practices for preconstruction, construction, and post construction periods.</li> <li>• Monitoring, remedial actions and reporting requirements.</li> <li>• 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.</li> </ul>	
4-2	<ol style="list-style-type: none"> <li>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.</li> <li>2. Schedule construction to avoid special-status species' breeding, spawning, or migration locations during the seasons or active periods that these activities occur.</li> <li>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.</li> <li>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.</li> <li>5. Conduct construction monitoring (by qualified biologist) to ensure effectiveness of avoidance and minimization measures and implement remedial measures if necessary.</li> <li>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).</li> <li>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).</li> </ol>	<p>Consistent.</p> <p>1: The project site is determined based on the location of the necessary levee erosion repairs.</p> <p>2-7: AMM's and Mitigation Measures (MM's) in the BALMD IS/MND address avoidance, minimization, and compensation for impacts on special-status species. Specific mitigation measures from the BALMD IS/MND that comprehensively address these required elements of DP MM 4-2 include: AMM 1: Timing of Work; AMM 5: Vegetation Removal and Tree Protection; Mitigation Measure BIO-1: Special Status Plants Avoidance; Mitigation Measure BIO-2. Roosting Bats Impact Avoidance and Minimization; Mitigation Measure BIO-3. General Wildlife Best Management Practices; Mitigation Measure BIO-4: Raptor Avoidance and Minimization Efforts; Mitigation Measure BIO-5: Non-Raptor Avoidance and Minimization Efforts; Mitigation Measure BIO-5: Green Sturgeon Mitigation Acreage and Mitigation Credits. See Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.</p>
4-3	<ol style="list-style-type: none"> <li>1. Select project site(s) that would avoid a substantial reduction in fish and wildlife species habitat.</li> <li>2. To the maximum extent practicable, design project elements to avoid effects that would lead to a substantial loss of fish and wildlife habitat.</li> <li>3. Replace, restore, or enhance habitats for fish and wildlife species that would be lost.</li> <li>4. Where substantial loss of habitat for fish and wildlife species is unavoidable, compensate for impacts by preserving in-kind habitat.</li> </ol>	<p>Consistent.</p> <p>1. The project site is determined based on the location of the necessary levee erosion repairs.</p> <p>2-4: The project has been designed to avoid natural communities to the extent possible, but there would be some impacts on riparian habitats, as described in the BALMD IS/MND. Overall, the project will mitigate for habitat impacts on-site with further habitat lift provided by additional acreages of enhancement habitat created on the constructed waterside benches.</p> <p>Implementation of AMM's and MM's including AMM 1: Timing of Work; AMM 5: Vegetation Removal and Tree Protection; Mitigation Measure BIO-1: Special Status Plants Avoidance; Mitigation Measure BIO-2. Roosting Bats Impact Avoidance and Minimization; Mitigation Measure BIO-3. General Wildlife Best Management Practices;</p>

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		Mitigation Measure BIO-4: Raptor Avoidance and Minimization Efforts; Mitigation Measure BIO-5: Non-Raptor Avoidance and Minimization Efforts; Mitigation Measure BIO-5: Green Sturgeon Mitigation Acreage and Mitigation Credits, would be equally or more effective. See Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.
4-4	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>	<p>Consistent.</p> <ol style="list-style-type: none"> <li>1. The project would expand habitat for migratory waterfowl or shorebirds by the construction of waterside riparian and wetland habitat features.</li> <li>2. See Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.</li> <li>3. The one diversion that will be relocated will be appropriately permitted by the landowner at time activation.</li> <li>4. See AMM 1: Timing of Work and the determination above under 3-1, which describes other AMM's that would be implemented to reduce water quality impacts.</li> </ol>
4-5	<ol style="list-style-type: none"> <li>1. 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.</li> </ol>	<p>Consistent.</p> <p>Sacramento's tree ordinance exempts tree removal associated with flood risk reduction activities.</p>
Delta Flood Risk		
5-1, 5-2, 5-4, 5-5	Not applicable. The proposed project is a multi-benefit flood system improvement project that will increase the performance, reliability and safety of the levee that protects Brannan Island.	<p>Consistent.</p> <p>The BALMD IS/MND did not identify a significant impact related to flood risk.</p>
Land Use		
6-1	Not applicable. The project is not a new facility or infrastructure.	<p>Consistent.</p> <p>The project is not a new facility or infrastructure.</p>
6-2	<ol style="list-style-type: none"> <li>1. 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: <ul style="list-style-type: none"> <li>• Recording a deed restriction that ensures permanent conservation and mitigation on other property of equal or greater environmental mitigation value;</li> <li>• Creating a buffer or barrier between uses;</li> <li>• Redesigning the project or selecting an alternate location that avoids or mitigates the impact; and/or</li> <li>• Restoring disturbed land to conditions to provide equal or greater environmental value to the land affected by the covered action.</li> </ul> </li> </ol>	<p>Consistent.</p> <p>See Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.</p>

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Agriculture and Forestry Resources		
7-1, 7-2, 7-3, 7-4	Not applicable. There is no adjacent agricultural land or forestry resources that will be affected by the project.	Consistent. The project site is located along the bank of the Sacramento River. There is no adjacent agricultural land or forestry resources.
Visual Resources		
8-1, 8-3	Not applicable. There are no visual resources that will be affected. Revegetation activities identified as part of the project will greatly improve the visual resources in the project corridor.	Consistent. The project site is located along the bank of the Sacramento River. There are no visual resources that will be affected.
8-2	<ol style="list-style-type: none"> <li>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.</li> <li>2. 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</li> </ol>	Consistent. 1-2. See AMM 5: Vegetation Removal and Tree Protection and Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.
9-1	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Maintain all equipment in proper working condition according to manufacturer's specifications.</li> <li>• Use electric equipment when possible. Use lower-emitting alternative fuels to power vehicles and equipment where feasible.</li> <li>• Use low Volatile Organic Compounds (VOC) coatings and chemicals; minimize chemical use.</li> <li>• Prepare a dust control plan and apply dust control measures at the construction sites.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>BMPs for fallowed lands could include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Implement conservation cropping sequences and wind erosion protection measures, such as: <ul style="list-style-type: none"> <li>○ 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.</li> <li>○ 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.</li> <li>○ Avoid any tillage if possible.</li> <li>○ Avoid any traffic or tillage when fields are extremely dry to avoid pulverization.</li> <li>○ Apply soil stabilization chemicals to fallowed lands.</li> <li>○ Re-apply drain water to allow protective vegetation to be established.</li> </ul> </li> </ul>	Consistent. Implementation of Mitigation Measure AQ-1: Best Available Construction Measures identified in the BALMD IS/MND would reduce impacts to a less than significant level. In addition, BALMD would implement avoidance and minimization measures (AMM's) AMM 3: Construction Best Management Practices (BMPs) and Monitoring; AMM 7: Construction Site Clean-up.

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Air Quality		
	<ul style="list-style-type: none"> <li>○ 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.</li> </ul> <p>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. <a href="http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQAGUIDELINES.aspx">http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQAGUIDELINES.aspx</a>).</p> <p>Basic Construction Mitigation Measures Recommended for ALL Proposed Projects</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. All haul trucks transporting soil, sand, or other loose material offsite shall be covered.</li> <li>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.</li> <li>4. All vehicle speeds on unpaved roads shall be limited to 15 mph.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol> <p>Additional Construction Mitigation Measures Recommended for Projects with Construction Emissions Above the Threshold</p> <ol style="list-style-type: none"> <li>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.</li> <li>2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.</li> <li>3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Windbreaks should have at maximum 50 percent air porosity.</li> <li>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.</li> <li>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.</li> <li>6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.</li> <li>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.</li> <li>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.</li> </ol>	
9-2, 9-3	Not applicable. All equipment utilized on the project will meet current ARB compliance requirements.	Consistent. The BALMD IS/MND did not identify impacts related to odors or emissions of air contaminants affecting sensitive receptors.

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Cultural Resources		
10-1	<ol style="list-style-type: none"> <li>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.</li> <li>If potentially CRHR-eligible prehistoric or historic-era archeological 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.</li> <li>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: <ul style="list-style-type: none"> <li>Planning construction to avoid the sensitive sites</li> <li>Deeding the sensitive sites into permanent conservation easements</li> <li>Capping or covering archaeological sites</li> <li>Planning parks, green space, or other open space to incorporate the sensitive sites</li> <li>Granting of cultural easements to Native American tribes for the purpose of protecting cultural resource properties</li> </ul> </li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>	<p>Consistent.</p> <p>1-3. Surveys have been conducted in accordance with Section 106 of the National Historic Preservation Act. See Mitigation Measure Cult-1: Unanticipated Discovery of Archaeological Resources; and Mitigation Measure TCR-1: Accidental Discovery of Tribal Cultural Resources.</p>



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10-2	<ol style="list-style-type: none"> <li>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).</li> <li>If human remains are encountered during ground-disturbing construction activities, stop work that would potentially affect the find and contact the county coroner. <ul style="list-style-type: none"> <li>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]).</li> <li>Following the coroner's findings, the property owner, contractor or project proponent, an archaeologist, and the NAHC-designated Most Likely Descendant (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.</li> <li>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: <i>(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.</i></li> <li>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.</li> </ul> </li> <li>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 <ul style="list-style-type: none"> <li>funerary objects, sacred objects, and objects of cultural patrimony.</li> </ul> </li> </ol>	<p>Consistent.</p> <p>1-2. The BALMD IS/MND requires compliance with state and Federal laws related to human remains as noted in Section 3.5. Implementation of Mitigation Measure Cult-2: Discovery of Human Remains identified in the BALMD IS/MND would reduce impacts to a less than significant level.</p>

Delta Plan Mitigation Measure #	Delta Plan Mitigation Measure	BALMD Project Consistency
10-3	<ol style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> </ol>	<p>Consistent.</p> <p>1-6. As described in the BALMD IS/MND, surveys have been conducted in accordance with Section 106 of the National Historic Preservation Act. See Mitigation Measure Cult-1: Unanticipated Discovery of Archaeological Resources.</p>
10-4	<ol style="list-style-type: none"> <li>1. Mitigation Measures 10-1 and 10-3 will also mitigate Impact 10-4, Disturbance or Destruction of Cultural Landscapes and Traditional Cultural Properties (from the 2013 Delta Plan Program EIR). 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.</li> </ol>	<p>Consistent.</p> <p>See the response above under 10-1 and 10-3.</p>
<b>Geology and Soils</b>		
11-1, 11-2, 11-3	<p>Not applicable. Seismic activity is will not effect the proposed erosion protection.</p>	<p>Consistent.</p> <p>The BALMD IS/MND did not identify impacts related to seismic hazards, including soil liquefaction and subsidence.</p>
11-4	<ol style="list-style-type: none"> <li>1. 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: <ul style="list-style-type: none"> <li>Erosion control measures such as silt fencing, sand bags, 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.</li> <li>During construction activities, topsoil shall be removed, stockpiled, and saved for reapplication following</li> </ul> </li> </ol>	<p>Consistent.</p> <p>See the response above under 3-1.</p>

Delta Plan Mitigation Measure #	Delta Plan Mitigation Measure	BALMD Project Consistency
	<p>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.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p>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.</p>	
11-5, 11-6, 11-7, 11-8, 11-9	Not applicable.	Consistent. The BALMD IS/MND did not identify impacts related to soil hazards.
Paleontological Resources		
12-1	<p>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:</p> <ul style="list-style-type: none"> <li>• Confirming the paleontological sensitivity (high, moderate, or low) of the areas to be impacted through review of project level geological and geotechnical data.</li> <li>• 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)</li> <li>• The assessment and recovery of discovered fossil resources.</li> <li>• The preparation and curation of fossil finds.</li> <li>• 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.</li> </ul>	Consistent. See Mitigation Measure GEO-1: Accidental Discovery of Paleontological Resources.
Mineral Resources		
13-1, 13-2	Not applicable. There are no mineral resources of significance in the project area.	Consistent. There are no mineral resources of significance in the project area.
Hazards and Hazardous Materials		
14-1	<ol style="list-style-type: none"> <li>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.</li> <li>2. Refueling of vehicles and equipment to occur only when employees are present.</li> <li>3. Vehicle and equipment service and maintenance conducted only by authorized personnel.</li> <li>4. Refueling conducted only with approved pumps, hoses, and nozzles.</li> <li>5. Catch-pans placed under equipment to catch potential spills during servicing.</li> <li>6. All disconnected hoses placed in containers to collect residual fuel from the hoses.</li> <li>7. Vehicle engines shut down during refueling.</li> <li>8. No smoking, open flames, or welding allowed in refueling or service areas.</li> <li>9. Refueling performed away from bodies of water to prevent contamination of water in the event of a leak or spill.</li> </ol>	Consistent. 1-17. See AMM 3: Construction Best Management Practices (BMPs) and Monitoring; AMM 4: Implementation of General Permit (General Permit) for Storm water Discharges Associated with Construction Activities.

Delta Plan Mitigation Measure #	Delta Plan Mitigation Measure	BALMD Project Consistency
	<p>10. When refueling is completed, the service truck to leave the project site.</p> <p>11. Service trucks provided with fire extinguishers and spill containment equipment, such as absorbents.</p> <p>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.</p> <p>13. Provision of an automatic sprinkler system for indoor hazardous material storage areas.</p> <p>14. Provision of an exhaust system for indoor hazardous material storage areas.</p> <p>15. Separation of incompatible materials by isolating them from each other with a noncombustible partition.</p> <p>16. Spill control in all storage, handling, and dispensing areas.</p> <p>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.</p> <p>In addition to the above, federal, state and local requirements for hazardous materials must be followed.</p> <p>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.</p> <p>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.</p>	
14-2	<p>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.</p> <p>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.</p>	<p>Consistent.</p> <p>1-2. See response to MM 14-1 above.</p>
14-3	<p>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.</p> <ul style="list-style-type: none"> <li>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.</li> <li>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. <a href="http://www.solanomoquito.com">http://www.solanomoquito.com</a>).</li> <li>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 methods such as mosquito fish to reduce mosquito breeding.</li> </ul>	<p>Consistent.</p> <p>The wetland bench will be tidally activated and as such will not pond water.</p>

Delta Plan Mitigation Measure #	Delta Plan Mitigation Measure	BALMD Project Consistency
14-4	Not applicable. The project is not within an airport operations area.	Consistent. The project does not involve the creation of any new habitats that would qualify as hazardous wildlife attractants.
14-5	Not applicable. The project will not contribute to increased fire risk.	Consistent. The project is located is along the waterside of the Sacramento River and is not designated as a Very High Fire Hazard Severity Zone.
Noise		
15-1	<ol style="list-style-type: none"> <li>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.</li> <li>2. Locate construction equipment away from sensitive receptors, to the extent feasible, to reduce noise levels below applicable local standards.</li> <li>3. Maintain construction equipment to manufacturers' recommended specifications, and equip all construction vehicles and equipment with appropriate mufflers and other approved noise-control devices.</li> <li>4. Limit idling of construction equipment to the extent feasible to reduce the time that noise is emitted.</li> <li>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.</li> <li>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.</li> <li>7. Near sensitive receptors, avoid or minimize use of construction equipment known to generate high levels of groundborne vibration (for example, pile drivers).</li> </ol>	Consistent. 1-7. See AMM 3: Construction Best Management Practices (BMPs) and Monitoring and Mitigation Measure NZ-1: Minimize Woodchipper Related Noise.
15-2	<ol style="list-style-type: none"> <li>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.</li> <li>2. Provided that future groundborne vibration results in significant impacts at sensitive receptors, the following measures shall be implemented: <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Adjacent historic features will be covered or temporarily shored, as necessary, for protection from vibrations, in consultation with the appropriate cultural resources authority.</li> <li>• 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.</li> <li>• Pile-driving activities conducted within 285 feet of sensitive receptors will occur during daytime hours to avoid sleep disturbance during evening and nighttime hours.</li> </ul> </li> </ol>	Consistent. 1-2. See AMM 3: Construction Best Management Practices (BMPs) and Monitoring and Mitigation Measure NZ-1: Minimize Woodchipper Related Noise.
15-3	Not applicable. The project is buffered by the levee and is also not adjacent to any sensitive noise receptors.	Consistent. The BALMD IS/MND did not identify a significant operational noise impact.

Delta Plan Mitigation Measure #	Delta Plan Mitigation Measure	BALMD Project Consistency
Population and Housing		
16-1	Not applicable. The project is not a housing development.	Consistent. The proposed project site is population and housing.
Public Services		
17-1	Not applicable. The project is not a facilities construction project.	Consistent. The BALMD IS/MND did not identify an impact related to public services.
Recreation		
18-1	Not applicable. There are no recreational facilities within the project area.	Consistent. There are no recreational facilities within the project area.
18-2	Not applicable. There are no recreational facilities within the project area.	Consistent. There are no recreational facilities within the project area.
18-3	<ol style="list-style-type: none"> <li>1. Projects shall be sited in areas that would have minimal adverse physical effect on the environment.</li> <li>2. 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.</li> </ol>	Consistent. 1-2. See AMM 5: Vegetation Removal and Tree Protection and Sections 2.3.4, 2.3.6 and 2.3.9 as described in the BALMD IS/MND and the Planting and Monitoring Plan.
Traffic and Transportation		
19-1, 19-4	<ol style="list-style-type: none"> <li>1. Avoid modifications to federal, State, and county highways, local roadways, and bridges that may reduce vehicle capacity, to the extent feasible.</li> <li>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 workarea.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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.</li> <li>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</li> </ol>	Consistent. 1-8. See AMM 1: Timing of Work and AMM 3: Construction Best Management Practices (BMPs) and Monitoring.

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	<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• Watering</li> <li>• Uniform layer of washed gravel</li> <li>• Roadmix</li> <li>• Paving</li> </ul> <p>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.</p> <p>8. 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:</p> <ul style="list-style-type: none"> <li>• Turn restrictions.</li> <li>• Roadway widening to add lanes or shoulders.</li> <li>• Redesign of freeway on- and off-ramps.</li> <li>• Median construction/modification to restrict access.</li> <li>• Flaring of intersections to add turn lanes.</li> <li>• Provision of passing lanes or turnouts.</li> <li>• Acceleration and deceleration lanes.</li> <li>• Removal of obstructions.</li> <li>• Roundabouts.</li> <li>• Restriping to add lanes with or without parking removal and restrictions.</li> <li>• Protected left-turn pockets or free right-turn lanes.</li> <li>• Parking restrictions, daily or during peak hours.</li> <li>• Fair share contributions to approved projects identified in the agency's Capital Improvement Plan.</li> <li>• Fair share contributions to traffic signals identified in the agency's traffic signal plan.</li> </ul> <p>9. 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.</p> <p>10. 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.</p> <p>11. To the extent feasible, ensure that safe boat access to public launch and docking facilities, businesses, and residences is maintained.</p> <p>12. Coordinate with transit system operators to establish appropriate alternate transit system routes to be rerouted during construction activities, as appropriate.</p> <p>13. 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</p>	

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	<p>they await passage. Floating barriers will guide boats into the passage facility chambers.</p> <p>14. Implement a program to provide boater education on procedures for waiting at and using the boat passage facility.</p> <p>15. 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.</p>	
19-2	Not applicable. The project is located along the riverbank and will not change or interfere with navigation.	Consistent. The project does not include facilities and would not interfere with boating or navigation.
19-3	Not applicable. The project is not accessible to vehicular traffic by roadway.	Consistent. The BALMD IS/MND did not identify impacts related to emergency access.
Utilities and Service Systems		
20-1, 20-2	<p>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.</p> <p>Verify utility locations through field surveys and services such as Underground Service Alert.</p>	Consistent. The project will not have a significant impact to, or related to utilities. See AMM 3: Construction Best Management Practices (BMPs) and Monitoring.
Climate Change and GHG Emissions		
21-1	Implement measures from CAPCOA, BAAQMD, or air district guidance, or from the Attorney General's list of measures.	Consistent. See Mitigation Measure AQ-1. Best Available Construction Measures. The Project would comply with SMAQMD thresholds for GHG emissions.
21-2,1-3, 21-4	Not applicable. The project is a flood system improvement project and is designed to mitigate potential impacts from flooding.	Consistent. The BALMD IS/MND did not identify an impact related to climate change adaptation.