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To:	Ed Fortner, District Manager Paradise Irrigation District 6332 Clark Road Paradise, California 95969	From:	Connie MacGregor, Project Manager Stantec Consulting Services Inc. 5000 Bechelli Lane Suite 203 Redding CA 96002
File:	STN# 2272006800	Date:	October 2, 2018

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**Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—  
Response to Public Comments Received on CEQA Initial Study/Mitigated Negative  
Declaration (SCH# 2018082044)**

In accordance with the California Environmental Quality Act (CEQA), an Initial Study/Mitigated Negative Declaration (IS/MND) for the Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project was made available to the public and interested agencies for a 30-day review period. The agency review period was managed by the State Clearinghouse (SCH) and ended on September 20, 2018; the public review period also ended on September 20, 2018. All written comments received during the public and agency review period are attached, along with written responses to environmental issues raised by commenters on the IS/MND. A Mitigation Monitoring and Reporting Program (MMRP) created for the project is also attached (Attachment 1).

Comments received on the public draft IS/MND do not indicate new significant impacts or significant new information that would require recirculation of the draft IS/MND pursuant to CEQA Guidelines Section 15073.5. Because no new significant environmental issues were raised during the 30-day comment period, this technical memorandum is being used to summarize comments and support adoption of the public draft IS/MND.

## RESPONSE TO COMMENTS

In addition to confirmation from the State Clearinghouse that the 30-day posting requirement was met, two letters were received regarding the IS/MND, both from public agencies—California Department of Forestry and Fire Protection (CalFire) and the Central Valley Regional Water Quality Control Board (RWQCB). These letters are attached to this technical memorandum in the order indicated:

- State Clearinghouse compliance (Letter A)
- CalFire (Letter B)
- Central Valley RWQCB (Letter C)

To assist in referencing comments and responses (if necessary), each letter was assigned a letter based on the date the letter or comment was received. Letter A confirms project compliance with the State Clearinghouse review requirements for draft environmental documents pursuant to CEQA and references Section 21104 (c) of the California Public Resources Code as it pertains to comments on the Public Draft IS/MND submitted by CDFW. No response is needed for this letter. Letter B was submitted via email on September 11, 2018. CalFire advised that the planned removal of trees at the Reservoir B site would require a timber harvest permit, and recommended PID submit a Public Agency, Public and Private Utility Right of Way Exemption application for the proposed timber operation prior to construction. Letter C, dated September 10, 2018, was sent by mail to PID. This letter described the regulatory requirements specific to Section 401 of the Clean Water Act under the authority of the Central Valley RWQCB. Responses to comments made in letters B and C are provided in this technical memorandum.

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

## **MITIGATION MONITORING AND REPORTING PROGRAM**

The MMRP (Attachment 1) includes all mitigation measures for the project and describes necessary monitoring actions to be taken, as well as the timing and frequency of the prescribed monitoring activities. CEQA requires that when adopting an MND, the lead agency must also adopt an MMRP.

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

LETTER A, 1 of 2



EDMUND G. BROWN JR.  
GOVERNOR

STATE OF CALIFORNIA  
GOVERNOR'S OFFICE of PLANNING AND RESEARCH



KEN ALEX  
DIRECTOR

September 19, 2018



Jim Passanisi  
Paradise Irrigation District  
6332 Clark Rd  
Paradise, CA 95969

Subject: Paradise Irrigation District Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project  
SCH#: 2018082044

Dear Jim Passanisi:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on September 18, 2018, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,



Scott Morgan  
Director, State Clearinghouse

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

**Document Details Report  
 State Clearinghouse Data Base**

**LETTER A, 2 of 2**

**SCH#** 2018082044  
**Project Title** Paradise Irrigation District Zone A Pump Station, Transmission Main, and Reservoir B Replacement  
**Lead Agency** Project  
 Paradise Irrigation District

**Type** MND Mitigated Negative Declaration  
**Description** PID operates a water treatment plant and the accompanying distribution system for Paradise, CA. The distribution system supplies potable water to 10,507 connections, serving a population of approx 26,000. The purpose of the project is to address several problematic operational constraints that affect the operation and management, and water quality compliance standards associated with the existing Reservoir B facility, and to increase the overall PID water storage capacity. The project is needed to improve operations, address maintenance and water quality issues, increase fire suppression storage, and provide for anticipated population growth within the PID service boundary.

**Lead Agency Contact**

**Name** Jim Passanisi  
**Agency** Paradise Irrigation District  
**Phone** 530-876-2067 **Fax**  
**email**  
**Address** 6332 Clark Rd  
**City** Paradise **State** CA **Zip** 95969

**Project Location**

**County** Butte  
**City** Paradise  
**Region**  
**Lat / Long** 40° 42' 13" N / 122° 48' 34" W  
**Cross Streets** Skyway, New Skyway, Pine Needle Dr, Coutolenc Rd  
**Parcel No.** multiple  
**Township** 22N **Range** 3E **Section** 1,12 **Base** MDBM

**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways** Little Butte Crk  
**Schools** Ridgeview HS  
**Land Use** public, community commercial, community facilities, multiple-family res, rural res

**Project Issues** Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

**Reviewing Agencies** Resources Agency; Central Valley Flood Protection Board; Department of Fish and Wildlife, Region 2; Cal Fire; Department of Parks and Recreation; Department of Water Resources; Caltrans, District 3 N; Regional Water Quality Control Bd., Region 5 (Redding); State Water Resources Control Board, Divison of Financial Assistance; State Water Resources Control Board, Division of Drinking Water, District 21; Native American Heritage Commission; Public Utilities Commission

**Date Received** 08/20/2018 **Start of Review** 08/20/2018 **End of Review** 09/18/2018

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

**LETTER B**

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

Edmund G. Brown Jr., Governor



**DEPARTMENT OF FORESTRY AND FIRE PROTECTION**

176 Nelson Ave  
Oroville, CA 95965-3384  
(530) 538-7111  
Website: [www.fire.ca.gov](http://www.fire.ca.gov)



September 11, 2018

Paradise Irrigation District  
Attn: Jim Passanisi  
6332 Clark Road  
Paradise, CA 95969

Re: Paradise Irrigation District Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project - State Clearing House # 2018082044

Dear Mr. Passanisi,

I have been asked to review Paradise Irrigation District's initial study and proposed mitigated negative declaration for improvements to the Zone A water distribution system and Reservoir B replacement with regards to impacts to fire protection and natural resources. I have found that the discussion of impacts to Agricultural and Forest Resources on page 28 incorrectly states that there will be no impacts to forest land. It appears that conifer and hardwood trees will be removed during the replacement of Reservoir B and this area meets the definition of forest land. The removal of trees and conversion of timber land is considered timber operations and therefore requires a timber harvest permit. I recommend that Paradise Irrigation District submit a Public Agency, Public and Private Utility Right of Way Exemption for this work. Please contact me if you have any questions.

B1

David Derby

[Sent via email](#)

Butte Unit Forester, RPF #2333  
Office: (530) 872-6334  
Cell: (530) 570-5025  
Fax: (530) 872-6213

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

## **California Department of Forestry and Fire Protection**

### ***Comment B-1***

CalFire disagreed with the no impact determination made in the Agricultural and Forest Resources initial study checklist. In its comment letter prepared by David Derby (Butte Unit Forester), CalFire asserted that removal of conifer and hardwood trees to accommodate the expansion of Reservoir B would be a conversion of timber land and therefore, a timber operation that will require a timber harvest permit. The letter concludes by recommending that PID submit a Public Agency, Public and Private Utility Right-of-Way Exemption for the proposed work.

*Response: PID will submit a Public Agency, Public and Private Utility Right-of-Way Exemption application to CalFire prior to construction of this project. PID will implement the timber operation in accordance with the conditions of the approved exemption.*

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)



LETTER C, 1 of 3



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**Central Valley Regional Water Quality Control Board**

10 September 2018

Jim Passanisi  
Paradise Irrigation District  
6332 Clark Road  
Paradise, CA 95969

**COMMENTS ON THE INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION FOR THE PROPOSED PARADISE IRRIGATION DISTRICT ZONE A PUMP STATION, TRANSMISSION MAIN, AND RESERVOIR B REPLACEMENT PROJECT, STATE CLEARINGHOUSE NUMBER 2018082044, PARADISE, BUTTE COUNTY**

The Central Valley Regional Water Quality Control Board (Central Valley Water Board) is a responsible agency for this project, as defined by the California Environmental Quality Act (CEQA). On 22 August 2018, we received your request for comments on the Paradise Irrigation District Zone A Pump Station, Transmission Main and Reservoir B Replacement Project (Project).

The Project consists of installing new Zone A pumps at the water treatment plant (WTP), installing a new 16-inch transmission main from the WTP directly to Zone A along New Skyway, modifying pump station #2 with a pressure regulating valve station to allow Zone A to feed Zone B, and replacing the existing Reservoir B with two 2.3 MG tank reservoirs. The project is largely linear, extending from the community of Magalia, south to the town of Paradise.

Based on our review of the information submitted for the proposed project, we have the following comments:

Clean Water Act (CWA) Section 401, Water Quality Certification

The Central Valley Water Board has regulatory authority over wetlands and waterways under the Federal Clean Water Act (CWA) and the California Water Code, Division 7 (CWC). Discharge of dredged or fill material to waters of the United States requires a CWA Section 401 Water Quality Certification from the Central Valley Water Board. Typical activities include any modifications to these waters, such as stream crossings, stream bank modifications, filling of wetlands, etc. 401 Certifications are issued in combination with CWA Section 404 Permits issued by the Army Corps of Engineers. The proposed project must be evaluated for the presence of jurisdictional waters, including wetlands and other waters of the State. Steps must be taken to first avoid and minimize impacts to these waters, and then mitigate for unavoidable impacts. Both the Section 404 Permit and Section 401 Water Quality Certification must be obtained prior to site disturbance. Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the

C1

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

LETTER C, 2 of 3

Paradise Irrigation District - 2 - 10 September 2018  
Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project

California Water Code. Both the requirements to submit a report of waste discharge and apply for a Water Quality Certification may be met using the same application form, found at:

[http://www.waterboards.ca.gov/centralvalley/water\\_issues/water\\_quality\\_certification/wqc\\_application.pdf](http://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/wqc_application.pdf)

C1

Isolated wetlands and other waters not covered by the Federal Clean Water Act

Some wetlands and other waters are considered "geographically isolated" from navigable waters and are not within the jurisdiction of the Clean Water Act. (e.g., isolated wetlands, vernal pools, or stream banks above the ordinary high-water mark). Discharge of dredged or fill material to these waters may require either individual or general waste discharge requirements from the Central Valley Water Board. If the U.S. Army Corps of Engineers determine that isolated wetlands or other waters exist at the project site, and the project impacts or has potential to impact these non-jurisdictional waters, a Report of Waste Discharge and filing fee must be submitted to the Central Valley Water Board. The Central Valley Water Board will consider the information provided and either issue or waive Waste Discharge Requirements. Failure to obtain waste discharge requirements or a waiver may result in enforcement action.

C2

Any person discharging dredge or fill materials to waters of the State must file a report of waste discharge pursuant to Sections 13376 and 13260 of the CWC. Both the requirements to submit a report of waste discharge and apply for a Non-Jurisdictional General Waste Discharge Requirement (WDR) may be met using the same application form, found at:

[http://www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2004/wqo/wqo2004-0004.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf)

General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (CGP)

Construction activity, including demolition, resulting in a land disturbance of one acre or more must obtain coverage under the CGP. The Paradise Irrigation District Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project must be conditioned to implement storm water pollution controls during construction and post-construction as required by the CGP. To apply for coverage under the CGP the property owner must submit Permit Registration Documents electronically prior to construction. Detailed information on the CGP can be found on the State Water Board website:

[https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/constpermits.shtml](https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml)

C3

Post-Construction Storm Water Requirements

Studies have found the amount of impervious surface in a community is strongly correlated with the impacts on community's water quality. New development and redevelopment result in increased impervious surfaces in a community. Post-construction programs and design standards are most efficient when they involve (i) low impact design; (ii) source controls; and (iii) treatment controls. To comply with Phase II Municipal Storm Water Permit requirements the Town of Paradise must ensure that new developments comply with specific design strategies and standards to provide source and treatment controls to minimize the short and long-term impacts on receiving water quality. The design standards include minimum sizing criteria for treatment controls and established maintenance requirements. The proposed project must be conditioned to comply with post-construction standards adopted by the Town of Paradise in compliance with their Phase II Municipal Storm Water Permit.

C4

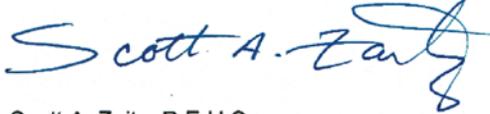
October 2, 2018  
Ed Fortner, District Manager  
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Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

**LETTER C, 3 of 3**

Paradise Irrigation District - 3 - 10 September 2018  
Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project

If you have any questions or comments regarding this matter please contact me at (530) 224-4784 or by email at [Scott.Zaitz@waterboards.ca.gov](mailto:Scott.Zaitz@waterboards.ca.gov).



Scott A. Zaitz, R.E.H.S.  
Environmental Scientist  
Storm Water & Water Quality Certification Unit

SAZ: db

cc w/o

enclosures: Department of Fish and Wildlife, Region 2, Rancho Cordova  
Mrs. Nancy Haley, U.S. Army Corps of Engineers, Sacramento

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

## **Central Valley Regional Water Quality Control Board**

### **Comment C-1**

Central Valley RWQCB requires that the project be evaluated for the presence of federal and state jurisdictional waters in accordance with Clean Water Act sections 404 and 401. Measures must be identified for the avoidance or minimization of impacts on these waters and to mitigate for unavoidable impacts. Both a Section 404 permit and a Section 401 Water Quality Certification for impacts on waters, including wetlands, must be obtained prior to site disturbance. In addition, any person discharging dredge or fill materials to waters of the State must file a waste discharge pursuant to sections 13376 and 13260 of the California Water Code.

*Response: Comment noted. A wetland delineation report (North State Resources, now Stantec, 2018) was prepared in accordance with Clean Water Act sections 404 and 401 to document and describe potential waters of the United States, including wetlands, in the project area. No impacts on potential waters of the United States are anticipated as a result of the proposed project. Proposed project activities would occur in previously disturbed or paved areas and no dredge or fill materials would be placed into potential waters of the United States. The existing culverts in the project area would be avoided (e.g., trenched under).*

### **Comment C-2**

Discharge of dredged or fill material into geographically isolated waters not under the jurisdiction of the Clean Water Act (e.g., isolated wetlands, vernal pools, or stream banks above the ordinary high-water mark) may require either individual or general waste discharge requirements from the Central Valley RWQCB. If the U.S. Army Corps of Engineers determine that isolated wetlands or other waters exist at the project site, and the project impacts or has potential to impact these non-jurisdictional waters, a Report of Waste Discharge and filing fee must be submitted to the Central Valley RWQCB. The Central Valley RWQCB will consider the information provided and either issue or waive Waste Discharge Requirements. Failure to obtain waste discharge requirements or a waiver may result in enforcement action. Any person discharging dredge or fill materials to waters of the State must file a waste discharge pursuant to sections 13376 and 13260 of the California Water Code.

*Response: Comment noted. A wetland delineation, was conducted in accordance with Clean Water Act sections 404 and 401 to document and describe potential waters of the United States, including wetlands, and waters of the State, including isolated waters or areas of riparian vegetation, in the project area. The proposed project would not result in the discharge of any waste into waters of the United States, waters of the State, or riparian vegetation communities. Water quality will be maintained through the use of best management practices, including erosion and sediment control measures and a stormwater pollution prevention plan (SWPPP). The potential for erosion along the pipeline would be the same as current conditions once the pipeline is installed and the disturbed areas are repaved. A Report of Waste Discharge and filing fee is not required for this project.*

### **Comment C-3**

Construction activity, including demolition, resulting in a land disturbance of one acre or more must obtain coverage under a construction general permit for storm water discharges associated with construction and land disturbance activities (CGP). The project will be conditioned to implement storm water pollution controls

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

during construction and post-construction as required by the CGP. To apply for coverage under CGP, the property owner must submit permit registration documents electronically prior to construction.

*Response: PID will use storm water pollution controls as required by the CGP.*

**Comment C-4**

The proposed project must be conditioned to comply with post-construction standards adopted by the Town of Paradise in compliance with its Phase II Municipal Storm Water Permit.

*Response: PID will comply with Town of Paradise post-construction standards and its Phase II Municipal Storm Water Permit for the portion of the project that falls within the town's jurisdiction.*

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

## MITIGATION MONITORING AND REPORTING PROGRAM

### ZONE A PUMP STATION, TRANSMISSION MAIN, AND RESERVOIR B REPLACEMENT PROJECT

This chapter comprises the Mitigation Monitoring and Reporting Program (MMRP) for the Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project (project). The purpose of this MMRP is to memorialize the mitigation responsibilities of Paradise Irrigation District (PID) in implementing the proposed project. The mitigation measures listed herein are required by law or regulation and will be adopted by the PID as part of the overall project approval. Mitigation is defined by the California Environmental Quality Act (CEQA) – Section 15370 as a measure that

- avoids the impact altogether by not taking a certain action or parts of an action;
- minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;
- reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- compensates for the impacts by replacing or providing substitute resources or environments.

Mitigation measures provided in this MMRP have been identified in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures of the Initial Study (IS)/Mitigated Negative Declaration (MND) and are considered feasible and effective in mitigating project-related environmental impacts.

This MMRP includes discussions of the following: legal requirements, intent of the MMRP; development and approval process for the MMRP; the authorities and responsibilities associated with implementation of the MMRP; a method of resolution of noncompliance complaints; and a summary of monitoring requirements.

**Legal Requirements:** The legal basis for the development and implementation of the MMRP lies within CEQA (including the California Public Resources Code). Sections 21002 and 21002.1 of the California Public Resources Code state:

- Public agencies are not to approve projects as proposed if there are feasible alternatives or feasible mitigation measures available that would substantially lessen the significant environmental effects of such projects.
- Each public agency shall mitigate or avoid the significant effects on the environment of projects that it carries out or approves whenever it is feasible to do so.

Section 21081.6 of the California Public Resources Code further requires that:

- The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.
- The monitoring program must be adopted when a public agency makes its findings under CEQA so that the program can be made a condition of project approval in order to mitigate significant effects on the environment. The program must be designed to ensure compliance with mitigation measures during project implementation to mitigate or avoid significant environmental effects.

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

**Intent of the Mitigation Monitoring and Reporting Program:** The MMRP is intended to satisfy the requirements of CEQA as they relate to the project. It will be used by PID staff, participating agencies, project contractors, and mitigation monitoring personnel during implementation of the project. The primary objective of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The MMRP will provide for monitoring of construction activities as needed, onsite identification and resolution of environmental problems, and proper reporting to lead agency staff.

**Development and Approval Process:** The timing elements for implementing mitigation measures and the definition of the approval process are provided in detail throughout this MMRP to assist PID staff by providing the most usable monitoring document possible.

**Authorities and Responsibilities:** PID, functioning as the CEQA Lead Agency, will have the primary responsibility for the execution and proper implementation of the MMRP and will be responsible for the following activities:

- coordination of monitoring activities
- maintenance of records concerning the status of all approved mitigation measures

PID, as implementing agency, is responsible for implementing the mitigation measures by incorporating them into the project specifications (contract documents) and enforcing the conditions of the contract in the field during construction. Some pre- and post-construction activities may be implemented directly by PID.

**Resolution of Noncompliance Complaints:** Any person or agency may file a complaint that alleges noncompliance with the mitigation measure(s) adopted as part of the approval process for the proposed project. The complaint shall be directed to Mr. Ed Fortner, Paradise Irrigation District, 6332 Clark Road, Paradise, CA, 95969, in written form describing the purported violation in detail. PID shall investigate and determine the validity of the complaint. If noncompliance with a mitigation measure is verified, PID shall take the necessary action(s) to remedy the violation. Complaints shall be responded to in writing including descriptions of PID's investigation findings and the corrective action(s) taken, if applicable.

**Mitigation Monitoring/Environmental Commitments Table:** Following this discussion is a table listing the conservation and mitigation measures, and associated monitoring requirements for the proposed project. These measures are organized by environmental issue area (i.e., Air Quality, Biological Resources, etc.) and consist of the following:

- Conservation (Measure(s)): lists the conservation measure(s) and best management practices that will be used to avoid or minimize the construction-related impacts on environmental and biological resources. For the table below, conservation measures described in the IS/MND were numbered to indicate the issue with which they are associated (e.g., Air Quality measures are labeled using "AQ").
- Mitigation Measure(s): lists the mitigation measure(s) identified for each potentially significant impact discussed in the IS/MND. For ease of identification in the table, each mitigation measure has been assigned a unique number (i.e., MMx).
- Timing/Implementation: Indicates at what project phase the measure will need to be implemented.
- Enforcement/Monitoring: Indicates which agency or entity is responsible for enforcement of the measure(s) and for implementing and monitoring each mitigation measure.
- Verification: Provides a space to be signed and dated by the individual responsible for verifying compliance with each measure.

**Environmental Commitment and Mitigation Monitoring Table  
For the Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project  
Mitigation Monitoring Program  
(State Clearinghouse No. 20180711)**

<b>ENVIRONMENTAL COMMITMENTS:</b> The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:			
Conservation Measures and BMPs	Timing/ Implementation	Enforcement/ Monitoring	Verification (Date/Initials)
<b>Air Quality/Fugitive Dust and Emissions Controls(AQ)</b>			
Air pollution control would conform to all applicable air pollution control rules, regulations, ordinances, and statutes. Dust would be controlled during construction activities and subsequent operation of the project. Dust controls may include, but would not be limited to the following elements, as appropriate:			
<b>AQ-1:</b> Pursuant to California Vehicle Code (Section 23114) (California Legislative Information 2016), all trucks hauling soil and other loose material to and from the construction site shall be covered or shall maintain at least 6 inches of freeboard (i.e., minimum vertical distance between top of load and the trailer).	Construction	Construction management	
<b>AQ-2:</b> Any soils that are removed during construction shall be stored onsite in piles not to exceed 4 feet in height. These spoil piles shall be clearly marked and flagged. Spoil piles that will not be immediately returned to use shall be revegetated with a non-persistent erosion control mixture.	Construction	Construction management	
<b>AQ-3:</b> Equipment and manual watering shall be conducted on all stockpiles, dirt/gravel roads, and exposed or disturbed soil surfaces, as necessary, to reduce airborne dust.	Construction	Construction management	
<b>AQ-4:</b> PID or its contractor shall designate a person to monitor dust control and to order increased watering as necessary to prevent transport of dust offsite. This person shall also respond to any citizen complaints.	Construction	Construction management	

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>ENVIRONMENTAL COMMITMENTS: The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:</b>			
<b>Conservation Measures and BMPs</b>	<b>Timing/Implementation</b>	<b>Enforcement/Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>Naturally Occurring Asbestos (NOA)</b>			
<p>If ultramafic rocks (e.g., serpentinite) or soils derived from ultramafic rocks are encountered during project design exploration or during construction, then testing for the presence of naturally occurring asbestos (NOA) shall be performed using randomized multi-increment sampling methods. If NOA concentrations are found to exceed established thresholds (California Geological Survey 2002), then mitigation measures shall be implemented to reduce the potential of inducing NOA to become airborne. In addition to <i>Conservation Measure #1—Air Pollution and Dust Control</i>, the following measure has been incorporated into the proposed project to minimize the potential for adverse impacts in the event that NOA concentrations are found to exceed established thresholds.</p>			
<b>NOA-1:</b> NOA-bearing soils and rock materials excavated during project activities shall be entombed as artificial fills within excavations (e.g., pipeline trench or suitable off-site disposal).	Construction	Construction management	
<b>Water Pollution Prevention (WPP)</b>			
<p>The project has been designed to avoid impacts on U.S. Army Corps of Engineers (Corps) jurisdictional features (i.e., waters of the United States). The following BMPs have been incorporated into the proposed project to avoid and minimize the potential for adverse direct and indirect effects on water quality.</p>			
<b>WPP-1:</b> Activities that increase the erosion potential within the project area shall be restricted to the relatively dry summer and early fall period (approximately May 15 to October 15) to the maximum extent practicable to minimize the potential for rainfall events to transport sediment to surface water features. If construction activities must take place during the late fall, winter, or spring, then temporary erosion and sediment control structures must be in place and operational at the end of each construction day and maintained until the completion of the project.	Construction	Construction management	

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>ENVIRONMENTAL COMMITMENTS: The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:</b>			
<b>Conservation Measures and BMPs</b>	<b>Timing/Implementation</b>	<b>Enforcement/Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>WPP-2:</b> Within 10 days of completion of construction, weed-free mulch shall be applied to disturbed areas in order to reduce the potential for short-term erosion. Prior to a rain event or when there is greater than 50 percent possibility of rain forecasted by the National Weather Service during the next 24 hours, weed-free mulch, tarps, or geotextile fabrics shall be applied to all exposed areas upon completion of the day's activities. Soils shall not be left exposed during the rainy season.	Construction	Construction management	
<b>WPP-3:</b> Suitable BMPs, such as silt fences, straw wattles, or catch basins, shall be placed below all construction activities at the edge of surface water features to intercept sediment before it reaches the waterway. These structures shall be installed prior to any clearing or grading activities.	Preconstruction/ Construction	Construction Management	
<b>WPP-4:</b> If spoil sites are used, they shall be located such that they do not drain directly into a surface water feature, if possible. If a spoil site drains into a surface water feature, catch basins shall be constructed to intercept sediment before it reaches the feature. Spoil sites shall be graded and vegetated to reduce the potential for erosion.	Construction/ Post-construction	Construction Management	
<b>WPP-5:</b> Sediment control measures shall be in place prior to the onset of the rainy season (or no later than October 15) and will be monitored and maintained in good working condition until vegetation becomes established within the disturbed areas.	Preconstruction/ Construction	Construction management	
<b>WPP-6:</b> Fueling construction equipment shall be done at a fixed fueling station to reduce the area exposed to the potential for fuel spills.	Construction	Construction management	
<b>WPP-7:</b> Secondary containment, such as a drain pan or drop cloth, shall be used to catch spills or leaks when removing or changing fluids.	Construction	Construction management	

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>ENVIRONMENTAL COMMITMENTS: The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:</b>			
<b>Conservation Measures and BMPs</b>	<b>Timing/Implementation</b>	<b>Enforcement/Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>WPP-8:</b> Spill containment materials shall be kept onsite at all times to contain any accidental spill.	Preconstruction/Construction	Construction management	
<b>WPP-9:</b> Absorbent materials shall be used on small spills rather than hosing down or burying the spill. The absorbent material shall be promptly removed and disposed of properly.	Construction	Construction management	
<b>WPP-10:</b> Onsite vehicles and equipment shall be regularly inspected for leaks and repaired immediately.	Construction	Construction management	
<b>WPP-11:</b> If vehicle and equipment maintenance must occur onsite, it shall be done in designated areas, located away from drainage courses, to prevent the run-on of storm water and the run-off of spills.	Construction	Construction management	
<b>WPP-12:</b> Equipment and materials shall be stored at least 50 feet away from surface water features.	Construction	Construction management	
<b>WPP-13:</b> PID is responsible for compliance with applicable federal, state, or local laws or ordinances and shall obtain authorization from all applicable regulatory agencies.	Preconstruction/Construction/Post-construction	PID	

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>ENVIRONMENTAL COMMITMENTS: The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:</b>			
<b>Conservation Measures and BMPs</b>	<b>Timing/Implementation</b>	<b>Enforcement/Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>Greenhouse Gas Emissions (GHG)</b>			
PID shall include provisions in the construction bid documents to minimize project-related greenhouse gas emissions. The following measures shall be implemented to reduce construction-related greenhouse gas emissions:			
<b>GHG-1:</b> Reuse and recycle construction and demolition waste, including, but not limited to soil, vegetation, concrete, lumber, metal, and cardboard.	Construction	PID/ Construction management	
<b>GHG-2:</b> Ensure that the project enhances, and does not disrupt or create barriers to, non-motorized transportation (e.g., bicycles, pedestrians) through proper pre-construction planning.	Construction	PID/ Construction management	
<b>GHG-3:</b> Protect existing trees to the extent possible and encourage the planting of new trees.	Construction	PID/ Construction management	
<b>Wildfire Potential (FIRE)</b>			
PID shall include the following measure in the construction bid documents to minimize project-related potential for wildfire ignition:			
<b>FIRE-1:</b> Per the requirements of Public Resources Code Section 4442, PID shall include a note on all construction plans that internal combustion engines shall be equipped with an operational spark arrester, or the engine must be equipped for the prevention of fire.	Preconstruction/ Construction	PID/ Construction management	

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>ENVIRONMENTAL COMMITMENTS: The following environmental commitments will be incorporated into the project to further protect environmental and biological resources:</b>			
<b>Conservation Measures and BMPs</b>	<b>Timing/Implementation</b>	<b>Enforcement/Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>Prevention of Spread of Invasive Species (INV)</b>			
The following avoidance and minimization measures are recommended during project construction to reduce the potential spread of invasive species:			
<b>INV-1:</b> All equipment used for off-road construction activities will be weed-free prior to entering the project area.	Construction	Construction management	
<b>INV-2:</b> If project implementation calls for mulches or fill, they will be weed free.	Construction	Construction management	
<b>INV-3:</b> Any invasive plant species removed during construction will be properly disposed of to ensure the species does not spread to other areas.	Construction	Construction management	

Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>CEQA MITIGATION MEASURES: Resource-specific mitigation measures will be used during project implementation include:</b>			
<b>Mitigation Measure (MM)</b>	<b>Timing/ Implementation</b>	<b>Enforcement/ Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>Bats</b>			
The following avoidance and minimization measures are recommended to avoid the potential for project-related impacts on pallid bats:			
<b>MM-1:</b> A pre-construction survey for roosting bats should be conducted prior to the demolition of any buildings or removal of trees or snags with a diameter at breast height of 12 inches or greater. The survey should be conducted by a qualified biologist and should occur no more than one week prior to demolition or tree removal work. If a maternity or hibernacula roost is found, the biologist in coordination with CDFW, will determine the extent of a construction free buffer zone around the roost. The buffer will remain in place until the bats are no longer dependent on the roost and have vacated the roost site.	Preconstruction/ Construction	PID/ Construction management/ CDFW	
<b>Migratory Birds and Raptors</b>			
Project activities shall be scheduled to avoid the nesting season to the extent feasible. The typical nesting seasons in northern California extends from February 1 through August 31. Thus, if project activities can be scheduled to occur outside of the nesting season, no impacts would be expected. If the nesting season cannot be completely avoided, the following measures shall be implemented.			
<b>MM-2:</b> A qualified biologist shall conduct a minimum of one pre-construction survey for nesting migratory birds and raptors within the project area and a 250-foot buffer around the project area. Preconstruction surveys shall be conducted no more than seven days prior to the start of activities or the re-start of temporarily suspended construction, vegetation removal, or ground disturbance activities in any given area. Preconstruction surveys shall be used to ensure that no active bird nests occurring within or immediately adjacent to the project will be disturbed during project implementation. If an active nest is found, a qualified biologist shall determine the extent of a construction-free buffer zone to be established around the nest. If it is anticipated that project activities will encroach on	Preconstruction/ Construction	PID/ Construction management/ CDFW	

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<b>CEQA MITIGATION MEASURES: Resource-specific mitigation measures will be used during project implementation include:</b>			
<b>Mitigation Measure (MM)</b>	<b>Timing/ Implementation</b>	<b>Enforcement/ Monitoring</b>	<b>Verification (Date/Initials)</b>
the buffer, a biological monitor will be present to ensure that the nesting birds are not disturbed by the activities.			
<b>MM-3:</b> If vegetation is to be removed by the project and all necessary approvals have been obtained, potential nesting substrates (e.g., trees and shrubs) that will be removed by the project shall be removed before the onset of the nesting season, if feasible. This will help preclude nesting and substantially decrease the likelihood of direct impacts.	Preconstruction/ Construction	PID/ Construction management/ CDFW	
<b>Cultural Resources</b>			
PID shall include provisions in the construction bid documents to minimize project impacts on cultural resources. The following measure shall be implemented to avoid construction-related impacts on cultural resources:			
<b>MM-4:</b> If any unanticipated archaeological finds are made in the APE that are considered to be significant, a number of methods shall be used to mitigate potential adverse effects. Avoidance through project redesign or some method of preservation is the preferred method. If redesign or preservation is not an option, it is recommended that any potential adverse effects on unanticipated finds be mitigated through data recovery, although actual mitigation would be determined through consultation with the SHPO under the NHPA. It is also recommended that local Native American groups be consulted and their input solicited and considered in all aspects of such testing and mitigation.	Construction	PID/ Construction management	

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Reference: Zone A Pump Station, Transmission Main, and Reservoir B Replacement Project—Response to Public Comments Received on CEQA Initial Study/Mitigated Negative Declaration (SCH# 2018082044)

<b>CEQA MITIGATION MEASURES: Resource-specific mitigation measures will be used during project implementation include:</b>			
<b>Mitigation Measure (MM)</b>	<b>Timing/Implementation</b>	<b>Enforcement/Monitoring</b>	<b>Verification (Date/Initials)</b>
<b>Human Remains</b>			
PID shall include provisions in the construction bid documents to minimize project impacts on cultural resources. The following measure shall be implemented to avoid construction-related impacts on inadvertently discovered human remains:			
<b>MM-5:</b> If human remains are found, the California Health and Safety Code requires that excavation be halted in the immediate area and that the Butte County coroner be notified to determine the nature of the remains. 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 (California 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 (California Health and Safety Code Section 7050.5[c]).	Construction	PID/ Construction management/ NAHC	