

4 Mitigation Monitoring and Reporting Program

CEQA requires a reporting or monitoring program be adopted for the conditions of project approval which are necessary to mitigate or avoid significant effects on the environment (Public Resources Code Section 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Initial Study-Mitigated Negative Declaration (Final IS-MND), specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Casitas Municipal Water District
Casitas-Ojai Water System Consolidation Project

Mitigation Measure/ Condition of Approval	Action Required	Timing	Monitoring Requirements	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comments
Air Quality						
AQ-1. VCAPCD Construction Mitigation Measures						
The following shall be implemented during construction to minimize emissions of ozone precursors.	Casitas to include these measures within the construction contract and on construction specifications.	Prior to issuance of construction permits	Once			
1. Minimize equipment idling time.						
2. Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications.	Prior to construction, Casitas to confirm with the construction contractor the fuel used for construction equipment and the construction equipment is in good working condition.	Prior to construction	Once			
3. Lengthen the construction period during smog season (May through October), to minimize the number of vehicles and equipment operating at the same time.						
4. Use alternatively fueled construction equipment, such as compressed natural gas, liquefied natural gas, or electric, if feasible.						
Biological Resources						
BIO-1. Worker Environmental Awareness Program						
Prior to initiation of project activities (including staging and mobilization), all personnel associated with project activities shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to aid workers in recognizing special status biological resources which may occur in the project site. This training shall include information about Crotch's bumblebee, special status reptiles (California legless lizard, coast whiptail, and coast patch-nosed snake), nesting birds, and protected trees.	Casitas to retain a qualified biologist to conduct a WEAP training. Ensure all employees working at the project site participate in the program.	Prior to and during construction, if new personnel are added	Once and as needed			
The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all	Construction contractor to ensure guidelines are followed during construction.	During construction	Ongoing			

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<p>contractors, their employees, and other personnel involved with construction of the project. Employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species.</p>						
BIO-2. Pre-Activity Surveys for Special-Status Reptiles						
<p>Within one week prior to the commencement of project activities at the Running Ridge site, a qualified wildlife biologist shall conduct a pre-activity survey in portions of the access and project area at the Running Ridge site containing potentially suitable scrub vegetation for California legless lizard, coastal whiptail, and coast patch-nosed snake. A 50-foot buffer around the Running Ridge site will be surveyed, with inaccessible areas (i.e., private lands) surveyed with binoculars, as practicable. The biologist will document existing conditions and search for California legless lizard, coastal whiptail, and coast patch-nosed snake. If California legless lizard, coastal whiptail, or coast patch-nosed snake are found, and could potentially be impacted by project activities at the Running Ridge site (e.g., trampling), individual animals shall be relocated to similar habitat away at least 100 feet away from project activities. The findings of the pre-activity survey will be provided to Casitas in a summary report prior to implementation of project activities.</p>	<p>Qualified biologist to conduct pre-activity survey at Running Ridge site.</p>	<p>One week prior to commencement of project activities at Running Ridge site</p>	<p>Once</p>			
	<p>Qualified biologist to provide findings of the pre-activity survey to Casitas.</p>	<p>Following completion of pre-activity survey</p>	<p>Once</p>			
	<p>Qualified biologist to relocate special-status reptile species to similar habitat, if needed.</p>	<p>As needed</p>	<p>As needed</p>			

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Casitas-Ojai Water System Consolidation Project

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BIO-3. Injured or Dead Wildlife						
If any special-status wildlife species are found harmed/injured or dead at the Running Ridge Tank Site, the qualified biologist should be notified, and dead or injured wildlife documented immediately. A formal report shall be sent to Casitas within three calendar days of the incident or finding. The report shall include the date, time of the finding or incident (if known), and located of the carcass or injured animal and circumstances of its death or injury (if known).	Construction contractor to notify qualified biologist if any special-status wildlife species are found harmed/injured or dead at the Running Ridge Tank Site.	As needed during construction	As needed			
	Qualified biologist to document dead or injured wildlife.	As needed during construction	As needed			
	Qualified biologist to send report, including date, time of the finding or incident (if known), and location of the carcass or injured animal and circumstances of its death or injury (if known), to Casitas.	Within three calendar days of the incident or finding	As needed			
BIO-4. Nesting Bird Season Avoidance						
To avoid disturbance of nesting and special status birds, including raptor species protected by the Migratory Bird Treaty Act and California Fish and Game Code Section 3503, activities related to the project including, but not limited to, vegetation removal, ground disturbance, and construction and demolition shall occur outside of the bird breeding season for migratory birds (February 1 through August 31), if practicable.	If practicable, avoid construction activities including, but not limited to, vegetation removal, ground disturbance, and construction and demolition between February 1 and August 31.	During construction	Ongoing			
BIO-5. Nesting Bird Survey						
If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than five days prior to initiation of project activities. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300-foot for raptors), and in inaccessible areas (e.g., private lands) from afar using binoculars to the extent practicable. The survey shall be conducted by a qualified biologist	For construction that occurs during the nesting bird season, retain a qualified biologist to conduct pre-construction nesting bird surveys.	Seven days prior to initial ground disturbance and/or vegetation removal, or reinitiation of construction following a one-week lapse, between February 1 and August 31	Once and as needed			

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<p>familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (e.g., 50 feet for common species, 300 to 500 feet for special-status species, and 500 feet for raptors) shall be determined and demarcated at the discretion of the qualified biologist with bright orange construction fencing, flagging, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season or until the young are no longer dependent on the nest, as determined by the qualified biologist. No project activities shall occur inside this buffer until the avian biologist has confirmed breeding/nesting is completed, and the young have fledged and are no longer dependent on the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist during monitoring and with confirmation that nesting is not adversely affected by project activities.</p>	<p>Establish avoidance buffers (and/or noise reduction measures), as needed, until a qualified biologist has determined that all young have fledged.</p>	<p>During construction activities, if nests are identified</p>	<p>As needed</p>			
BIO-6. Jurisdictional Waters Avoidance and Minimization						
<p>The construction contractor(s) shall implement the following best management practices during work at the OWS Wellfield site:</p> <ul style="list-style-type: none"> ▪ Areas of temporary disturbance shall be minimized to the extent practicable. ▪ Staging and laydown areas shall occur in unvegetated areas and previously disturbed sites only. ▪ All vehicles and equipment shall be in good working condition and free of leaks to avoid or minimize the risk of oil, petroleum products, or any other pollutant from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks. 	<p>Casitas to include these measures in construction specifications.</p>	<p>Prior to issuance of construction contracts</p>	<p>Once</p>			
	<p>Construction contractor to ensure these measures are implemented throughout the construction period.</p>	<p>Throughout construction</p>	<p>Ongoing</p>			

Casitas Municipal Water District
Casitas-Ojai Water System Consolidation Project

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<ul style="list-style-type: none"> ▪ Materials shall be stored on impervious surfaces or plastic ground covers to avoid or minimize effects of any spills or leakage. Material storage shall be at least 100 feet from San Antonio Creek. Any material/spoils from project activities shall be located and stored 100 feet from San Antonio Creek. Construction materials and spoils shall be protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. ▪ The construction contractor(s) shall provide street sweeping, vacuuming, and rumble plates, as appropriate, to avoid or minimize the off-site tracking of loose construction and landscape materials. ▪ Avoid or minimize the discharge of silt or pollutants off the site when working adjacent to San Antonio Creek by installing BMPs (e.g., silt barriers, sand bags, straw bales) as appropriate. ▪ All food related trash shall be disposed of in closed containers and removed from the project area each day during the construction period. Construction personnel shall not feed or otherwise attract wildlife to the construction area. At project completion, all project-generated debris, vehicles, building materials, and rubbish shall be removed from the project footprint. ▪ All re-fueling, cleaning, and maintenance of equipment shall occur at least 100-feet from San Antonio Creek. ▪ Any spillage of material shall be stopped if it can be done safely. The contaminated area shall be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or other designated liaison shall notify Casitas immediately. 						

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BIO-7. Arborist Study						
<p>To the extent required by law, an Arborist Study shall be completed for any protected trees occurring within or adjacent to (with any portion of the crown overhanging) the project footprint required by the County or the City. The study shall determine the jurisdiction of any trees to be impacted or protected in place. An Arborist Report shall be prepared by a Certified Arborist in compliance with both the City of Ojai and County of Ventura ordinance guidelines. Specifically, the Arborist Report shall include, at minimum:</p> <ul style="list-style-type: none"> ▪ An inventory of all trees that are within or adjacent to (with any portion of the crown overhanging) the project footprint, as feasible without trespassing on private lands. Inventory data shall record, at minimum: trunk location, species, diameter at standard height (DBH), height, dripline, mapping, and health and vigor rating. ▪ Representative photographs of each regulated tree that may be impacted. ▪ Description of proposed site development activities including, but not limited to, excavation for trenching, any tree trimming for access, and construction access routes. ▪ A project-specific Tree Protection Plan (TPP) shall be prepared which would at a minimum include site plans, protective tree fencing, the designated tree protection zone (identifying an area sufficiently large enough to protect the tree and its roots from disturbance), activities prohibited/permitted within the tree protective zone, encroachment boundaries, and potential requirements for transplanting or replacement tree plantings. <p>The Arborist Report shall be completed consistent with the tree ordinance guidelines of the County of Ventura or City of Ojai prior to the start of any tree-disturbing construction activities, as necessary.</p>	Casitas to retain an arborist or related qualified professional.	Prior to issuance of construction contracts	Once			
	Arborist or related qualified professional to prepare an Arborist Report that contains tree protection measures during construction and mitigation for protected trees impacted by the project.	Prior to issuance of construction contracts	Once			
	Casitas and/or construction contractor to implement recommendations of Arborist Report.	During and after construction	As needed			

Casitas Municipal Water District
Casitas-Ojai Water System Consolidation Project

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CUL-1. Unanticipated Discovery of Cultural Resources						
<p>In the event of the unanticipated discovery of archaeological materials, the construction contractor shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by an archaeologist who meets the Secretary of the Interior’s Professional Qualification Standards (qualified archaeologist). Prehistoric archaeological materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil (“midden”) containing heat-affected rocks, artifacts, or shellfish remains; stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-period materials might include stone or concrete footings and walls; filled wells or privies; and deposits of metal, glass, and/or ceramic refuse. Construction should not resume until the qualified archaeologist has conferred with Casitas on the significance of the resource.</p> <p>If it is determined the discovered archaeological resource constitutes a historical resource or unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Data Recovery</p>	<p>If archaeological resources are encountered during construction, Casitas to retain an archaeologist meeting the Secretary of Interior’s Professional Qualifications Standards for archaeology to evaluate the unanticipated find(s).</p> <p>Construction contractor to cease all work activities in the area of the discovery until Casitas and the qualified archaeologist determine the next steps.</p> <p>If the find is determined to be Native American in origin, Casitas and qualified archaeologist to contact an appropriate Native American monitor to participate in the evaluation of the resource and determine the appropriate treatment.</p>	<p>During construction, as needed</p> <p>During construction, as needed</p> <p>During construction, as needed</p>	<p>As needed</p> <p>As needed</p> <p>As needed</p>			

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<p>and Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with Casitas. The Archaeological Resources Data Recovery and Treatment Plan shall provide for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The qualified archaeologist and Casitas shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those of scientific importance, are considered.</p>						
GEO-1. Unanticipated Fossil Discovery						
<p>Casitas shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. If a potential fossil is discovered during project construction, construction activity within 50 feet of the find shall cease until the discovery is examined by a Qualified Professional Paleontologist. If the find is determined to be significant, the Qualified Professional Paleontologist shall direct all mitigation efforts related to paleontological resources consistent with the SVP (2010) standards, which may include, but are not limited to: paleontological monitoring; fossil salvage, preparation, and curation; and reporting to summarize the paleontological mitigation efforts.</p>	<p>Casitas to include an inadvertent discovery clause in all construction contracts.</p> <p>If a potential fossil is discovered during construction, Casitas to retain a Qualified Professional Paleontologist to evaluate the unanticipated find(s).</p> <p>If the fossil is determined to be significant, paleontologist to oversee mitigation in accordance with SVP (2010) standards, which may include monitoring, fossil salvage, preparation, curation, and reporting.</p>	<p>Prior to issuance of construction contracts</p> <p>During construction, as needed</p> <p>During construction, as needed</p>	<p>Once</p> <p>As needed</p> <p>As needed</p>			

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NOI-1. Groundborne Vibration Reduction						
To reduce vibration levels generated at structures on contiguous parcels to the Private Drive and Foothill Road sites, the following measure shall be implemented during construction of the Private Drive and Foothill Road pipelines:	Casitas to include the vibration mitigation requirement in the construction contract.	Prior to issuance of construction contracts	Once			
<ul style="list-style-type: none"> ▪ Construction activities using a roller shall be conducted with a static or pneumatic roller in lieu of a vibratory roller. 	Construction contractor to review and acknowledge this requirement prior to the start of construction.	Prior to construction activities	Once			
This measure shall be shown within the construction contract for the project and reviewed by the construction contractor prior to the start of construction. Casitas shall verify the construction contractor has implemented this requirement prior to the start of excavation activities and prior to the start of paving activities at the Private Drive and Foothill Road sites by confirming the construction equipment meets the above requirements.	Casitas to check the construction equipment at the Private Drive and Foothill Road sites to verify the construction contractor is only using static or pneumatic rollers for excavation and paving activities.	Prior to paving and excavation activities at the Private Drive and Foothill Road sites	Once			