

**FINAL
MITIGATION MONITORING AND REPORTING PROGRAM
SUPPLEMENTAL
ENVIRONMENTAL IMPACT REPORT 597
SECOND AMENDMENT TO THE
2001 PRIMA DESHECHA GENERAL DEVELOPMENT PLAN**

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ATTACHMENTS

Attachment A – Air Quality Mitigation Tables (not included in the body of the MMRP)

1.0 INTRODUCTION

The California Public Resources Code §21081.6 (AB 3180) requires that a lead or responsible agency adopt a Mitigation Monitoring and Reporting Program (MMRP) when approving or carrying out a project where an environmental document, either an environmental impact report (EIR) or a mitigated negative declaration (MND), has identified measures to reduce potential adverse environmental impacts. The County of Orange Integrated Waste Management Department (IWMD) is the lead agency for Amendment No. 2 to the 2001 Prima Deshecha General Development Plan and, therefore, is responsible for implementation of the MMRP. An SEIR has been prepared for this project which identifies the potential environmental impacts and, where appropriate, recommends measures to mitigate these impacts. An MMRP is required to ensure that adopted mitigation measures are successfully implemented.

1.1 BACKGROUND

The 2001 Prima Deshecha General Development Plan (GDP) and its First Amendment were accompanied by EIR 575 for which a Notice of Determination was issued on November 6, 2001. EIR 575 served as a Project EIR for near-term projects development and as a Programmatic EIR for long-term development of the project site, which covered known actions at the project site related to: current and future project operations; foreseeable and known site improvements related to regional transportation requirements; and subsequent land uses through the post-build-out period of project completion. At the time EIR 575 was approved, engineering designs had not been developed for ultimate build-out and operations of the PDL, and engineering and geotechnical considerations for future phases of project operation had not been fully addressed with respect to impacts on biological resources. Accordingly, EIR 575 stated its intent to function as a Program EIR for these aspects of the project development. Specifically mentioned within this context were landfill operations in the eastern portion of the site and unanticipated projects elsewhere on the property. Accordingly, EIR 575 was intended to simplify and narrow the scope of the necessary documentation that is required by CEQA for these portions of the site once additional project information became available.

Amendment No. 2 to the 2001 GDP further defines the extent of ground disturbance at the PDL site over the boundaries identified within EIR 575 and the 2001 GDP. Although there was no change to the refuse prism or refuse volumes being accepted at the PDL, a refined analysis of existing geotechnical conditions and project operational requirements was performed, indicating that a larger area of temporary ground disturbance was needed to support continued landfill operations. The proposed project increases the area of temporary ground disturbance around the site to accommodate future landslide remediation requirements and implementation of landfill-related support features. Additional proposed project features are intended to reduce impacts to on-site biological resources, sustain existing biological mitigation areas, and coordinate an integrated, site-wide pre-mitigation program to assist in obtaining long-term resource agency permits. These features include adjustments to the Zone 4 desilting system and measures needed to provide for continued surface water flows into the Prima Deshecha Canada riparian corridor as landfill buildout progresses. Although consistent in concept with the 2001 GDP, these elements constitute incremental additions, refinements, and minor changes to the approved 2001 GDP, the effects of which are analyzed within SEIR 597.

CEQA Section 15370 defines "mitigation" as: avoiding an environmental impact altogether by not taking a certain action or parts of an action; minimizing environmental impacts by limiting the degree or magnitude of the action and its implementation; rectifying the environmental impact by repairing, rehabilitating, or restoring the impacted environment; reducing or eliminating the environmental impact over time by preservation and maintenance operations during the life of

the action; or compensating for the environmental impact by replacing or providing substitute resources or environments. This MMRP includes Standard Conditions and Mitigation Measures from SEIR 597 and previously approved EIR 575 that remain pertinent and continue to apply to the proposed project. They have been identified as measures to reduce potential adverse environmental impacts. These two components of the mitigation program are described below.

- **Project Design Features** – Project Design Features are based on local, state, or federal regulations or laws that are frequently required independently of CEQA review and also serve to offset or prevent specific impacts. Typical project design features and requirements include compliance with the provisions of the Uniform Building Code, South Coast Air Quality Management District Rules, local agency fees, etc. Additional conditions may be imposed on the project by government agencies during the approval process, as appropriate. The applicability of many of the standard conditions and regulations to the project would be finally determined at later phases of project approval in association with subsequent discretionary and administrative approvals. The IWMD Project Design Features that would be applied (as appropriate) to the project (i.e., coordination with utility companies) are listed in this MMRP. When an adopted IWMD Project Design Feature is identified, the letters PDF followed by a number are used.
- **Mitigation Measures** – Where a potentially significant environmental effect has been identified and is not reduced to a level considered less than significant through the application of PDFs, and standard conditions and regulations, project-specific mitigation measures have been identified.

The Orange County Board of Supervisors adopts this MMRP in its capacity as the lead agency in accordance with the provisions of the CALIFORNIA ENVIRONMENTAL QUALITY ACT (“CEQA”) (CAL.PUB.RES.CODE §§21000, *et seq.*) and its implementing guidelines (14 CAL.CODE REGS. §§15000, *et seq.*) (the “CEQA GUIDELINES”).

The principal purpose of the MMRP is to ensure that the Board-approved mitigation measures for the adopted Project are implemented and monitored for compliance during subsequent planning stages and, ultimately, during project implementation. In general, the County of Orange IWMD is responsible for overseeing implementation and completion of the adopted mitigation measures. This includes the review of all monitoring reports, enforcement actions, and document disposition, unless otherwise noted in the attached MMRP table. If an adopted mitigation measure is not being properly implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

1.2 MITIGATION MONITORING AND REPORTING PROGRAM MANAGEMENT

The MMRP for the Prima Deshecha Landfill project will be active through all phases of the project, including design, construction, and operation. There are mitigation measures that will need to be implemented continuously throughout the development of the project site. For instance, mitigation measures implemented “prior to approval of plans and specifications” will need to be implemented before that phase of the project can begin the construction. The enforcement of the MMRP will be the responsibility of the County of Orange IWMD. The County of Orange IWMD personnel responsible for verifying compliance with the mitigation measures are identified in the MMRP and include the Director of IWMD, a qualified biologist, a qualified botanist, IWMD-Assigned Personnel, Landfill Fee Station personnel, and/or landfill refuse inspectors. These parties are responsible for ensuring that the mitigation measures are implemented by the project applicant. If an adopted mitigation measure is not being properly

implemented, the designated monitoring personnel shall require corrective actions to ensure adequate implementation.

1.3 MITIGATION MONITORING REPORTING PROGRAM

The MMRP is provided in tabular format to facilitate effective tracking and documentation of the status of mitigation measures. The attached MMRP table provides the following monitoring information:

- **Mitigation Measure** – A list or inventory of all the adopted mitigation measures for the Project;
- **Implementing Action** – Identifies the method by which the adopted measure will be initiated by the applicant. Satisfactory completion of the measure will be verified by the Responsible Party;
- **Method of Verification** – Identifies the method by which the mitigation measure is confirmed;
- **Timing of Verification** – The appropriate time or phase for the implementation of each mitigation measure; and
- **Responsible Party** – The County of Orange Integrated Waste Management Department or Departments responsible for overseeing the implementation and completion of each mitigation measure. The responsibility to determine compliance with the mitigation measure lies with the County, as the lead agency for the project.

This MMRP will be supplemented by documentation to address mitigation compliance for each phase of project development. The on-going documentation/monitoring of mitigation compliance will be completed by the Integrated Waste Management Department. The completed MMRP and supplemental documents will be kept on file at the offices of the County of Orange IWMD.

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
GEOPHYSICAL					
Previously Adopted Mitigation					
The following mitigation measures are currently in place for impacts associated with the landfill component of the 2001 GDP, as identified in EIR 575 (numerical designations are from EIR 575). All mitigation commitments contained within FEIR 575 and the 2001 GDP will apply to the Proposed Project.					
MM 4.2-1a: Prior to designing each phased landfill plan and specifications, the IWMD shall conduct a geotechnical investigation to determine the extent of landslide material and the soil foundation characteristics of the proposed phase. A geotechnical report of the phased site area shall be prepared which includes a landslide excavation and removal plan prepared to the satisfaction of the Director, IWMD.	Review of Plans and Specifications	Plan Check	Prior to the design of each Landfill Phase	Director, IWMD or Designee	
MM 4.2.1b: For each phased grading plan, the excavation and grading plan shall ensure the stability of all cut, fill, and lined slopes. Slopes shall be designed to withstand the most probable earthquake based on a return period of 100 years or as required by current regulations. Liner design plans shall be submitted to the San Diego Regional Water Quality Control Board (RWQCB) for approval. The plans shall also be incorporated in an Joint Technical Document (JTD) and submitted to the LEA for approval and to the CIWMB for concurrence	Review of Plans and Specifications	Plan Check	Prior to the approval of the Amended RDSI	Director, IWMD or Designee	
MM 4.2-2a: The IWMD shall demonstrate that landfill design plans comply with the state and federal seismic requirements in CCR Title 27, and 40 Code of Federal Regulations (CFR) §258.14 (Seismic Impact Zones) and §258.15 (Unstable Areas). These demonstrations shall be incorporated in the IWMD Operating Record prior to construction of said plans.	Review of Plans and Specifications	Plan Check	Prior to the approval of the Landfill Design	Director, IWMD or Designee	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.2-2b: Prior to commencement of daily excavations for borrow material, grading plans shall be prepared, analyzed for slope stability, and submitted for approval by the Director, IWMD, or his designee.	Review of Plans and Specifications	Plan Check	Prior to the commencement of daily excavations for borrow material	Director, IWMD or Designee	
MM 4.2-2c: As part of a JTD, the IWMD shall present the assumptions, methods, and calculations used to demonstrate seismic safety. This measure is required only if final slopes are planned to be steeper than a ratio of 3:1 (horizontal to vertical), or if the site is located in an area subject to liquefaction or in unstable areas with poor foundation conditions as described in the Seismic Safety Element of the Orange County General Plan (27 CCR 17777).	Review of Plans and Specifications	Plan Check	Prior to the approval of the Amended RDSI	Director, IWMD or Designee	
MM 4.2.3: As part of a JTD, the IWMD shall present the assumptions, methods, and calculations used to demonstrate that differential settlement of the site will not result in future environmental impacts (27 CCR 21090).	Review of Plans and Specifications	Plan Check	Prior to the approval of the Amended RDSI	Director, IWMD or Designee	
MM 4.2-4: When the JTD is prepared, the IWMD shall identify the assumptions, methods, and calculations performed to demonstrate that the excavation plans provide for sufficient quantities and sources of suitable soils or alternative cover systems for daily and intermediate cover, final cover, and liner materials. This section of the JTD should also reference and summarize any borrow studies conducted to demonstrate the availability of sufficient quantities of materials. If materials are obtained on site, the description shall include which sections of the site will be excavated for each sequence of landfilling and where these materials will be stockpiled for use. Stockpile locations should not interfere with unloading, spreading, compacting, access, safety, drainage, or other operations on the site. Stockpiles should be clearly shown on the fill sequencing and	Review of Plans and Specifications	Plan Check	Prior to the approval of the Amended RDSI	Director, IWMD or Designee	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
excavation plans prepared for construction. (27 CCR 21600).					
HYDROLOGY & WATER QUALITY					
Previously Adopted Mitigation					
The following mitigation measures are currently in place for impacts associated with the landfill component of the 2001 GDP, as identified in EIR 575 (numerical designations are from EIR 575). All mitigation commitments contained within EIR 575 and the 2001 GDP will apply to the Proposed Project.					
MM 4.2-5a: The IWMD shall continue to operate its existing leachate control system within the active landfill area. In addition, the IWMD shall be required to construct a corresponding leachate control and recovery system in those areas where new liners are constructed and in areas added to the active landfill area.	Review of Plans and Specifications	Plan Check	Ongoing and prior to construction of new liners	Director, IWMD or Designee	
MM 4.2-5b: The site shall continue to operate under the groundwater monitoring requirements contained in Waste Discharge Requirements, Order No. 89-102, Technical Change Order (TCO) No. 1, Amended Waste Discharge Requirements contained in Order No. 93-86, and any future orders issued by the San Diego RWQCB. TCO No. 1 contains the detailed Groundwater and Vadose Zone Monitoring Program for the Prima Deshecha Landfill.	Review of Plans and Specifications	Field Monitoring	Ongoing	Director, IWMD or Designee	
MM 4.2-5c: As part of a revised JTD, the IWMD shall present the assumptions, methods, and calculations used to predict leachate generation and sizing of the components of the leachate collection system.	Review of Plans and Specifications	Prior to the approval of the Amended RDSI	Prior to the approval of the Amended RDSI	Director, IWMD or Designee	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.3-1a: As part of a JTD to be prepared by IWMD, the IWMD shall present the assumptions, methods, and calculations used to calculate the potential flow quantities for run-on, run-off, and sediment content of storm water flow used in sizing drainage and sediment control facilities.	Review of Plans and Specifications	Plan Check	Prior to the approval of the JTD	Director, IWMD or Designee	
MM 4.3-1b: As part of a JTD to be prepared by IWMD, the IWMD shall include surface drainage plans for final fill and bottom excavation plans, including any berms, down drain systems, storm drain systems, direction of flow in perimeter drainage channels, and the location of off-site discharge point for runoff water.	Review of Plans and Specifications	Plan Check	Prior to the approval of the JTD	Director, IWMD or Designee	
MM 4.3-1c: Detention, diversion, and drainage facilities shall be designed and constructed to accommodate the anticipated volume of precipitation and peak flows from surface runoff under the precipitation conditions specified in §20365 of Title 27 of the California Code of Regulations for each class of waste management unit (WMU). In addition, drainage facilities for WMUs shall be designed to prevent washout of the WMUs during a 100-year storm event.	Review of Plans and Specifications	Plan Check	Prior to the approval of the Amended RDSI	Director, IWMD or Designee	
MM 4.4-1a: The IWMD shall comply with its National Pollutant Discharge Elimination System (NPDES) Storm Water Pollution Prevention Plan (SWPPP) and its NPDES Monitoring and Reporting Plan for the landfilling under the GDP. This plan will ensure that the measures taken to safeguard surface water quality are effective and are being correctly employed.	Review of Plans and Specifications	Plan Check	Prior to construction of landfilling improvements in Zones 1 and 4	Director, IWMD or Designee	
MM 4.4-1b: The IWMD shall continue to implement the existing Surface Water Runoff Monitoring Program as described in the currently effective Waste Discharge Requirements.	Review of Plans and Specifications	Field Monitoring	Ongoing	Director, IWMD or Designee	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.4-2: As part of the NPDES program and prior to approval of construction contracts, the Director, IWMD, or a designee, shall ensure that silt loading to surface waters from the construction activities will be periodically tested and controlled, where necessary, by appropriate erosion control measures, siltation basins, or other settling structures.	Review of Plans and Specifications	Field Monitoring	Prior to the approval of construction contracts	Director, IWMD or Designee	
<p><u>Mitigation for Impacts Associated with Amendment No. 2 to the 2001 GDP</u></p> <p>Although several project impacts have been identified in the above analyses relative to permanent impacts on groundwater recharge and drainage patterns within Zone 4, the Proposed Project has been designed to offset these impacts through the creation of a rainfall collection system and subsurface reservoir to augment surface water flows (or other water augmentation measures deemed to be feasible and approved by the regulatory agencies). These design features are intended to mimic natural hydrologic conditions and serve to maintain biological resources within Prima Deshecha Cañada stream channel. Consequently, with these project elements in place in addition to the mitigation measures identified above for the 2001 GDP, there will be no effect to on- or off-site resources. However, compliance with current requirements set forth in the DAMP will be required.</p>					
MM 5.3-1 The Proposed Project will comply with Section 7 of the Drainage Area Management Plan (DAMP) for Orange County through the development of a Water Quality Management Plan.	Review of Plans and Specifications	Verify inclusion in Plans and Specifications	Prior to approval of Plans and Specifications	Director, IWMD or Designee	
AIR QUALITY					
<p><u>Previously Adopted Mitigation</u></p> <p>Note: The numbering in this section corresponds with the numbering in FEIR 575.</p>					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.9-1: Landfill fee station personnel and/or landfill refuse inspectors shall reject extremely odorous loads for disposal in the landfill.	Review of Plans and Specifications	Field Inspection	Daily	Landfill Fee station personnel and/or landfill refuse inspectors	
MM 4.9-2: The active face of the landfill shall be covered daily. If the active face is in close proximity and upwind of on-site recreation uses, masking or neutralization agents may be added to exposed refuse to reduce the odor nuisance effects on the adjacent recreation uses.	Review of Plans and Specifications	Field Inspection	Daily	IWMD-Assigned Monitor	
MM 4.9-3: The IWMD shall design, construct, and operate new landfill areas in Zones 1 and 4 with LFG systems to maximize the collection of LFG. The LFG systems will include continuous monitoring of the LFG collection system to maximize efficient collection of LFG generated in these areas	Review of Plans and Specifications	Plan Check	Prior to the approval of the LFG system	Director, IWMD or Designee	
MM 4.9-4: During landfill operations, the IWMD shall continue regular visual inspections of the landfill cover and monitoring of LFG emissions throughout the entire refuse fill areas. The purpose of these inspections is to locate cracks or other defects or flaws in the landfill cover, which may allow LFG to escape. When such areas are identified, the IWMD will implement the appropriate corrective action as soon as feasible. These corrective actions may include application and compaction of additional cover material, adjustment of the existing LFG control system, and/or installation of new LFG control facilities.	Landfill Operation	Field Inspection	Quarterly	Landfill Site Supervisor	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.9-5: During landfill operations, the IWMD shall conduct periodic odor surveys on the landfill site and at various points in the area surrounding the site. The IWMD shall conduct odor surveys if any odors from the landfill are detected off site and reported by nearby residents. When the source of these odors is identified, the IWMD will implement the appropriate corrective action as soon as feasible. These corrective actions may include application and compaction of additional cover material, use of masking or neutralizing agents, adjustment of the existing LFG control system, and/or installation of new LFG control facilities.	Landfill Operation	Field Inspection	Daily	IWMD-Assigned Monitor	
MM 4.9-6: During landfill operations, the IWMD shall ensure that landfill operations areas that are to be left exposed temporarily, including top deck and excavation slopes, are sprayed periodically with water, as needed.	Landfill Operation	Field Inspection	Ongoing	IWMD-Assigned Monitor	
MM 4.9-7: On landfilled areas that are no longer in use, the IWMD will, as appropriate, incorporate dust control systems or vegetative covers, consistent with the Final Closure Plans and with IWMD's approved Rule 403 Compliance Plan for landfilling Zones 1 and 4.	Review of Plans and Specifications	Field Inspection	Ongoing	Landfill Site Supervisor	
MM 4.9-8: During landfill operations, the landfill fee station personnel and/or landfill refuse inspectors shall refrain from accepting dusty loads of refuse for disposal in either landfilling Zone 1 or 4. Alternatively, at the discretion of landfill personnel, dusty loads of refuse may be accepted for disposal if they are sprayed with water prior to leaving the fee station and accessing the active face of the landfill.	Landfill Operations	Field Inspection	Ongoing	Landfill Fee Station Personnel	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.9-9a: During landfill operations, the IWMD shall maintain water trucks on site to spray water on unpaved roads, as needed, to minimize the generation of dust as vehicles travel on these roads (per IWMD's approved Rule 403 Compliance Plan).	Landfill Operations	Field Inspection	Daily	Landfill Site Supervisor	
MM 4.9-9b: During landfill operations, the IWMD shall, to the extent feasible while still maintaining appropriate landfill operations, restrict vehicular travel on unpaved roads on the site. In the event that unpaved roads must be used, the IWMD shall spray water on these roads, as needed.	Landfill Operations	Field Inspection	Daily	Landfill Site Supervisor	
MM 4.9-9c: As unpaved on-site roads are removed from active service, the IWMD will spray these areas with a hydromulch solution or synthetic binder.	Landfill Operations	Field Inspection	Ongoing	Landfill Site Supervisor	
MM 4.9-10: During landfill operations, the IWMD will use the on-site water trucks to spray water on graded areas or areas where the vegetation has been removed or severely disturbed as a result of landfilling activities (per IWMD's approved Rule 403 Compliance Plan).	Landfill Operations	Field Inspection	Ongoing	Landfill Site Supervisor	
<u>Recommended Mitigation Measure Updates</u> <i>Particulate Emission (PM10) Control</i> MM 5.4-1: IWMD and its contractors shall be required to comply with regional rules to reduce air pollutant emissions. SCAQMD Rule 401 sets limits on the opacity of visible plumes of dust resulting from activities at the landfill. SCAQMD Rule 402 requires that air pollutant emissions generated at the landfill not be a nuisance off site. SCAQMD Rule 403 requires that fugitive dust be controlled with the best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emission source. Two options are presented in Rule 403: monitoring of particulate concentrations	Review of Plans and Specifications	Verify inclusion in Plans and Specifications	Prior to approval of Plans and Specifications	Director, IWMD or Designee	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>or active control. Monitoring involves a sampling network around the project with no additional control measures unless specified concentrations are exceeded. The active control option does not require any monitoring, but requires that a list of measures be implemented on a daily basis.</p>					
<p>SCAQMD Rule 403 requires that “best available control measures” be utilized whenever a dust-generating activity occurs in the Air Basin. These measures are listed in Table 1 of Rule 403 and called out in Table 5.4-6 (see Attachment A) It is important to note that all applicable measures from Table 5.4-6 should be implemented to achieve the required PM10 emissions reductions.</p> <p>Rule 403 requires that “Large Projects” implement additional measures. A Large Project is defined as “any active operations on property which contains 50 or more acres of disturbed surface area; or any earth-moving operation with a daily earth-moving or throughput volume of 3,850 cubic meters (5,000 cubic yards) or more than three times during the most recent 365 day period. The Prima Deshecha Landfill would be considered a Large Project under Rule 403. Therefore, the landfill is required to implement the applicable actions specified in Table 2 of the Rule. Table 2 from Rule 403 is presented as Table 5.4-7 (see Attachment A).</p> <p>As a Large Operation, the landfill will also be required to:</p> <ul style="list-style-type: none"> • Submit a fully executed Large Operation Notification (SCAQMD Form 403N) to the SCAQMD Executive Officer within 7 days of qualifying as a large operation; • Include, as part of the notification, the name(s), address(es), and phone number(s) of the person(s) responsible for 					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
the submittal, and a description of the operation(s), including a map depicting the location of the site;					
<ul style="list-style-type: none"> • Maintain daily records to document the specific dust-control actions taken, maintain such records for a period of not less than three years; and make such records available to the Executive Officer upon request; • Install and maintain project signage with project contact signage that meets the minimum standards of the <i>Rule 403 Implementation Handbook</i>, prior to initiating any earthmoving activities; • Identify a dust control supervisor that is employed by or contracted with the property owner or developer, is on the site or available on-site within 30 minutes during working hours, has the authority to expeditiously employ sufficient dust mitigation measures to ensure compliance with all Rule requirements, and has completed the AQMD Fugitive Dust Control Class and has been issued a valid Certificate of Completion for the class; and • Notify the SCAQMD Executive Officer in writing within 30 days after the site no longer qualifies as a large operation. 					
<p>Mobile Equipment Emission Control MM 5.4-2: To reduce equipment emissions, the following measures shall be implemented when feasible.</p> <ul style="list-style-type: none"> • Use low emission mobile construction equipment. "CARB Certified" heavy construction equipment conforms to the latest off-road CARB emission standards 	Review of Plans and Specifications	Verify inclusion in Plans and Specifications	Prior to approval of Plans and Specifications	Director, IWMD or Designee	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>and is the lowest polluting equipment available. The use of this equipment would reduce heavy equipment NOx emissions by approximately 30 percent and heavy equipment PM10 emissions by approximately 50 percent from the emissions levels shown in Tables 5.4-3 through 5.4-5. This is a substantial reduction but will not reduce emissions to less than the significance thresholds.</p> <ul style="list-style-type: none"> • Maintain construction equipment engines by keeping them tuned. • Use low sulfur fuel for stationary construction equipment. This is required by SCAQMD Rules 431.1 and 431.2. • Utilize existing power sources (i.e., power poles) when feasible. This measure would minimize the use of higher polluting gas or diesel generators. • Use aqueous diesel fuel where feasible and reasonably commercially available. • Use cooled exhaust gas recirculation (EGR) where feasible and reasonably commercially available. <p>Several of the mitigation measures listed above are advanced emission control technologies that are currently not commercially available. For example, aqueous diesel fuel reduces NOx formation by reducing combustion temperatures, which results in lower NOx emissions. According to the SCAQMD, the current availability of this fuel technology is limited, and it may not be available for use at the landfill. In addition, with EGR diesel engines, a small amount of hot exhaust gas is routed through a cooler and is mixed with fresh air entering the engine. The</p>					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>exhaust gas helps reduce the temperature during combustion, which lowers the formation of thermal NOx. EGR technology is in the development phase and has not been fully commercialized. To the extent that the advanced emissions-control technologies become reasonably commercially available, or are required by the CARB from grading contractors, then such advanced emissions-control technologies will be used.</p> <ul style="list-style-type: none"> Furthermore, a requirement to install diesel particulate filters on construction equipment used at the landfill was considered to further reduce emissions. However, the availability of construction equipment retrofitted with diesel particulate filters is limited. This is a result of operational problems in diesel engines equipped with these filters. Therefore, this potential mitigation measure for construction is considered infeasible. 					
BIOLOGICAL RESOURCES					
<p>Previously Adopted Mitigation The following mitigation measures are currently in place associated with the landfill component of the 2001 GDP, identified in EIR 575 (numerical designations are from EIR 575). All mitigation commitments contained within FEIR 575 and the 2001 GDP will apply to the Proposed Project.</p>					
<p>MM 4.5-1: The restoration of needlegrass grasslands will be incorporated into the Conceptual Coastal Sage Scrub Mitigation Plan (described below in MM 4.5-2a through 2c), the IWMD will replace impacted needlegrass grassland at a 1:1 ratio.</p>	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Prior to construction of landfilling improvements in Zones 1 and 4</p>	<p>Director, IWMD or Designee</p>	
<p>MM 4.5-2a: Prior to the removal of coastal sage scrub habitat resources including clearing, grubbing, mowing, disking, trenching, grading, fuel modification, or other construction-related</p>	<p>Review of Plans and Specifications</p>	<p>Coastal Sage Scrub IHLMP or other resource agency approved plan</p>	<p>Prior to the removal of coastal sage scrub habitat resource</p>	<p>Director, IWMD or Designee/Director of Planning, PDSD</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>activities, the Director, IWMD or his designee shall prepare and submit, in consultation with the Planning and Development Services Department (PDSD) Director of Planning or his designee, an Interim Habitat Loss Mitigation Plan (IHLMP) to the USFWS for review and approval in compliance with the Natural Communities Conservation Plan (NCCP) and Interim Coastal Sage Scrub (CSS) Habitat Loss Process. The County remains committed to the NCCP process and intends to operate by the same procedure outlined in the Federal Endangered Species Act Section 4(d) Special Rule for Incidental Take of the coastal California gnatcatcher or other agreement as determined to be appropriate by the resource agencies.</p>					
<p>MM 4.5-2b: The GDP shall be amended to include all applicable provisions of the approved Southern Subregion NCCP on its adoption by the County of Orange Board of Supervisors. The NCCP implementation programs may include, but are not limited to, requirements for the removal and mitigation replacement of lost coastal sage scrub habitat, operations restrictions, instructional signs, fencing, etc.</p>	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Subsequent to approval of the Southern Subregional NCCP</p>	<p>Director, IWMD or Designee</p>	
<p>MM 4.5-2c: In accordance with an approved Conceptual Coastal Sage Scrub Mitigation Plan, the IWMD shall replace impacted coastal sage scrub at a minimum 1:1 (or as otherwise stated by USFWS) replacement ratio of in-kind habitat for on-site and off-site habitat preservation, replacement, or enhancement.</p> <p>The IWMD shall prepare a Conceptual Coastal Sage Scrub Mitigation Plan in cooperation with the affected resource agencies (CDFG, USFWS). Guidelines for the Mitigation Plan shall be as follows:</p> <ul style="list-style-type: none"> The mitigation areas/sites shall have been evaluated and selected on the basis of 	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Prior to mitigation site preparation</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>their suitability for use as coastal sage scrub revegetation areas. The parameters evaluated shall include but not be limited to soil condition, slope aspect, proximity to adjacent coastal sage scrub, level of difficulty of site preparation, and ownership status.</p> <ul style="list-style-type: none"> The mitigation plan shall provide procedures to prepare the soils in the mitigation area, provide detailed seeding/planting mixtures; provide seeding/planting methods; and provide any other procedures (such as supplemental irrigation, mycorrhizal inoculation, etc.) that will be used for successful revegetation. Maintenance and monitoring goals shall be established. The components and implementation of the maintenance and monitoring procedures shall be consistent with the components and implementation of Mitigation Measure 4.5-7a. <p>In accordance with the approved Conceptual Coastal Sage Scrub Mitigation Plan, the IWMD shall develop a maintenance and monitoring program to ensure success of the revegetation effort. Maintenance shall include regular inspection of the site for excessive weed growth, erosion problems, failure of irrigation system, and/or unhealthy or dying plants. Invasion of the site by weeds in the area, especially pampas grass, artichoke thistle, castor bean, fountain grass, mustard, clover, cocklebur, and tree tobacco could be a potential maintenance problem. Maintenance crews shall be able to recognize the difference between native plant and weed seedlings. A qualified biologist will be required to instruct the maintenance crew in the identification of native plant seedlings. The</p>					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>maintenance program shall include procedures for regular maintenance and repair of the irrigation system.</p>					
<ul style="list-style-type: none"> A system shall be developed for reporting by the maintenance crew of any unhealthy or dying plantings or failure in any of the seeded areas. This would assist the monitoring crew in the development of immediate remedial measures, such as replacing plant material, to correct the problem. <p>To document the success of revegetation programs, the IWMD shall ensure that the progress of the revegetated area is monitored by a qualified biologist. The maintenance and monitoring plan will address unique aspects of mitigation areas. An agreement shall be developed between the County and the USFWS and CDFG on criteria that will be used to determine successful plant establishment on a mitigation site. Success criteria will include plant cover, species diversity, habitat structure, and density and will be based on measurements made in reference habitats near the mitigation site.</p>					
<p>MM 4.5-3a: Prior to grading for the landfilling activities affecting riparian resources, the IWMD, as appropriate, shall ensure that all sycamore and willow trees of four or more inches in diameter at breast height (DBH), defined as 4.5 feet from mean ground level, within the grading or construction limits of the landfilling activities (whichever is greater) and within 100 feet of grading and construction operations, shall be tagged and numbered with permanent tags under the supervision of a qualified biologist. The tag numbers of the trees to be protected and those to be removed shall be noted. Those trees adjacent to the construction areas that can be avoided will</p>	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Prior to grading for landfilling activities affecting riparian resources</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>be tagged for protection. Trees that cannot be avoided during construction shall be tagged for removal and fenced off with red-orange flexible mesh fencing during grading and construction activities. Records of these numbers shall be kept by the Director, IWMD or his designee for use in mitigation, replacement, and monitoring of tree resources before, during, and after grading and construction activities. In addition, prior to grading and site preparation, the IWMD shall ensure that all trees subject to removal are marked with a red "X" on the trunk. Trees to be preserved shall be marked with yellow flagging visible from all directions and fenced-off with red-orange flexible mesh fencing during grading and construction activities.</p>					
<p>MM 4.5-3b: During the process of obtaining the required 404 Permit Application and 1601 Streambed Alteration Agreement (1601/404) for encroachment into streambed areas and prior to site preparation, the IWMD shall prepare a Conceptual Riparian Mitigation Plan in cooperation with the affected resource agencies (CDFG, USFWS, USACE). Guidelines for the Mitigation Plan shall be as follows:</p> <ul style="list-style-type: none"> • The mitigation sites will be evaluated and selected on the basis of their suitability for use as riparian revegetation. The parameters evaluated shall include but not be limited to soil condition, hydrology, geology, and drainage considerations, level of difficulty of site preparation, access, contiguousness with existing habitat, and ownership status. • The mitigation plan shall include the procedures for soil preparation, provide seeding/planting mixtures; include seeding/planting methods; and include 	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Prior to mitigation site preparation</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
any other procedures (such as supplemental irrigation, mycorrhizal inoculation, etc.) that will be used.					
<ul style="list-style-type: none"> Maintenance and monitoring goals shall be established. The components and implementation of the maintenance and monitoring assignments shall be consistent with the components and implementation of Mitigation Measure 4.5-3d. 	Review of Plans and Specifications	Verify inclusion in Plans and Specifications	Prior to approval of Plans and Specifications	Director, IWMD or Designee	
MM 4.5-3c: In accordance with an approved Conceptual Riparian Mitigation Plan, the IWMD shall replace impacted riparian areas at a minimum 2:1 or higher ratio of in-kind or higher quality habitat. The required replacement acreage will be approved by the resource agencies having jurisdiction over the impacted resources (i.e., CDFG, USACE, USFWS), for all the GDP uses, based on jurisdictional delineations and vegetation mapping and the current 2001 GDP grading plan.	Review of Plans and Specifications	Field Inspection	Following implementation of Riparian Mitigation Plan	Director, IWMD	
MM 4.5-3d: During the process of obtaining the 404 Permit and 1601 Streambed Alteration Agreement, in accordance with the approved Conceptual Riparian Mitigation Plan, the IWMD shall develop a maintenance and monitoring program to ensure success of any revegetation effort. Maintenance shall include regular inspection of the site for excessive weed growth, erosion problems, failure of irrigation system, and/or unhealthy or dying plants. Invasion of the site by weeds in the area, especially pampas grass, artichoke thistle, mustard, clover, castor bean, fountain grass, cocklebur, and tree tobacco could be a potential maintenance problem. Maintenance crews shall be able to recognize the difference between native plant and weed seedlings. A qualified biologist will be required to instruct the maintenance crew in the identification	Review of Plans and Specifications	Maintenance and Monitoring Plan Check	Ongoing	Director, IWMD	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>of native plant seedlings. The maintenance program shall include procedures for regular maintenance and repair of the irrigation system.</p>					
<p>A system shall be developed for reporting by the maintenance crew of any unhealthy or dying plantings or failure in any of the seeded areas. This would assist the monitoring crew in the development of immediate remedial measures, such as increasing the irrigation rate or replacing plant material, to correct the problem.</p> <p>To document the success of revegetation programs, the IWMD shall ensure that the progress of the revegetated area is monitored by a qualified biologist. An agreement shall be developed between the County and the USACE, USFWS, or CDFG on criteria that will be used to determine successful plant establishment on a mitigation site. These criteria will include plant cover and density and will be based on measurements made in reference habitats near the mitigation site.</p> <p>The qualified biologist shall monitor the site for five years or until the site complies with required performance standards. If the biologist determines that the mitigation site meets the conditions of the performance criteria prior to the five-year period, documentation shall be submitted to the responsible agency for approval.</p>					
<p>MM 4.5-3e: Prior to grading and site preparation adjacent to riparian areas outside the limits of construction, the IWMD shall incorporate instructions in the construction documents ensuring that, in conjunction with construction activities:</p> <ul style="list-style-type: none"> Graded material spoils shall not be placed or stored near riparian areas outside the limits of construction. 	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Ongoing</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<ul style="list-style-type: none"> The removal of streamside or bank vegetation shall be avoided wherever feasible. 					
<ul style="list-style-type: none"> The amount of habitat removed shall be limited to the minimum amount required for construction. Riparian areas in the vicinity of grading or heavy recreation use, such as in Zone 1, shall be designated as Environmentally Sensitive Areas onsite preparation, grading, and construction plans, and fenced off as appropriate for protection before any of these activities begin. Excess fill shall not be dumped in streams outside the limits of construction. Vehicles and equipment shall not be parked in washes or other drainages outside the limits of construction. 					
<p>MM 4.5-4a: Prior to site preparation and during final design for each phase of landfill development (i.e., Phases A–D in Zone 1 and Phases A–I in Zone 4), the Director, IWMD shall ensure that focused surveys are conducted by qualified biologists for the thread-leaved brodiaea, Coulter’s saltbush, many-stemmed dudleya, southern tarplant, vernal barley, paniculate tarplant, and any other plant species that may warrant focused surveys in the future as determined by a qualified botanist. In addition, the Director, IWMD shall ensure that focused surveys are conducted by qualified biologists for the western spadefoot toad, southwestern willow flycatcher, and other wildlife species that may warrant focused surveys in the future as determined by a qualified biologist.</p> <p>The results of the surveys shall be incorporated into environmental documentation for future</p>	<p>Review of Plans and Specifications</p>	<p>Field Surveys</p>	<p>Prior to site preparation and during final design for each phase of landfill development</p>	<p>Director, IWMD</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>proposed projects within the Prima Deshecha site. Identified special status species and habitats located within 300 feet of the affected area(s) shall be mapped on grading plans for each phase of development. In addition, the Director, IWMD shall implement procedures approved by the appropriate resource agencies to mitigate the potential impacts to those species. In the event that landfill activities within a phase must occur prior to the completion of spring surveys, habitat for the special status plant species shall be salvaged, stored, and used in an appropriate manner as determined by a qualified biologist. The appropriate agencies will be notified prior to disturbance. All future proposed projects within the Prima Deshecha Landfill shall provide vegetation mapping on topographic maps at a scale of 1 inch equals 200 feet.</p>					
<p>MM 4.5-4b: The IWMD shall ensure that, for the periods covering all site preparation, disturbance or grading of native areas, the Director, IWMD or his designee shall monitor wildlife habitat preservation. The purpose of this monitoring is to ensure that the Environmentally Sensitive Areas and Environmentally Restrictive Areas (i.e., areas outside the grading limits) will not be adversely impacted during site preparation, grading, and construction of the landfilling activities.</p> <p>For the landfilling activities, this inspection program shall be coordinated with the Site Manager at the weekly meetings held at the Landfill to review the planned grading program for the landfilling activities. These meetings shall commence at the start of each new phase, when native ground is schedule for disturbance (e.g., grading or stockpiling). The Director, IWMD or his designee will attend these meetings and provide a status and progress report to the</p>	<p>Review of Plans and Specifications</p>	<p>Field Inspection</p>	<p>Ongoing</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>Operations Manager. These meetings will be held throughout the site preparation, grading, and construction periods for all the landfilling activities, and the monitoring reports shall continue to be prepared and submitted by the Director, IWMD or his designee until the disturbance is completed.</p> <p>The monitor shall be on site before, during, and after the completion of site preparation, grading, and construction for all the landfilling activities.</p>					
<p>MM 4.5-5a: During site preparation and grading for the landfill, the IWMD shall phase these operations outside significant habitat areas during the nesting and breeding season for the coastal California gnatcatcher. This measure shall be overseen and conducted by a qualified biologist.</p> <p>During site preparation and grading for the landfill, the IWMD shall phase these operations outside significant habitat areas during the nesting and breeding season for the least Bell's vireo. This measure shall be overseen and conducted by a qualified biologist. Prior to activities that may impact potential vireo habitat, updated vireo surveys will be conducted by a qualified biologist.</p>	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Prior to site preparation or direct/indirect disturbance to native or restored areas</p>	<p>Director, IWMD</p>	
<p>MM 4.5-5b: The IWMD shall ensure that grading and construction operations for the landfilling are redirected temporarily around nesting sites for a distance of 500 feet for candidate and listed species of birds and a distance of 1,000 feet for raptors during nesting and breeding seasons between February 15 and July 15, or a distance and time period agreed upon by the USFWS. In the event that a coyote, bobcat, or mountain lion den is located, then grading and construction operations shall be redirected temporarily around the den for a</p>	<p>Review of Plans and Specifications</p>	<p>Plan Check and Field Monitoring</p>	<p>Prior to site preparation and construction operations</p>	<p>Director, IWMD</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>distance of 1,000 feet. The nesting sites and dens should be resurveyed toward the end of the breeding seasons of these species to verify completion of the breeding cycle. Nests and dens that will be removed due to the grading and/or construction operations shall be removed only during the non-breeding season.</p>					
<p>MM 4.5-6: The IWMD shall ensure that during final design, the landfill operation continues to incorporate regulatory agency guidelines to reduce indirect impacts associated with noise, dust, night lighting, and blowing debris. Noise shall be controlled through the proper maintenance of the construction equipment, including trucks, bulldozers, and other mobile and fixed construction equipment. Dust shall be controlled at its source with standard wetting techniques consistent with applicable Southern California Air Quality Management District (SCAQMD) requirements. Low lighting alternatives and shielded lighting shall be employed to reduce indirect impacts on surrounding habitats.</p>	<p>Review of Plans and Specifications</p>	<p>Plan Check</p>	<p>Prior to approval of the Final Design of a landfill phase or ancillary infrastructure facility</p>	<p>Director, IWMD or Designee</p>	
<p>Additional Mitigation Measures Mitigation Measure MM 5.5-1 – Additional Provisions for Thread-Leaved Brodiaea</p> <p>Prior to the Initiation of construction within Phase C3, OCIIWMD will obtain authorization to take the thread-leaved brodiaea may be obtained from CDFG through the provisions of Section 2081(b) of the California Fish and Game Code if no federal nexus is present such as a USACE Section 404.</p> <p>If a USACE Section 404 Permit is being pursued, IWMD would request consultation with the USFWS under Section 7 of the FESA. Consultation is required between the USFWS and a federal agency (such as the USACE) whenever a federal action is likely to adversely</p>	<p>Review of Plans and Specifications</p>	<p>Verify inclusion in Plans and Specifications</p>	<p>Prior to the initiation of construction</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>affect species listed as Threatened or Endangered, such as thread-leaved brodiaea. The anticipated federal action is the issuance/amendment of a 404 permit that will affect the thread-leaved brodiaea.</p> <p>At the conclusion of the consultation, the USFWS will prepare a Biological Opinion based upon its review of the information provided herein. The final Biological Opinion may include an incidental take statement.</p> <p>As part of the consultation process under Section 7 of the FESA, the CDFG will be consulted pursuant to Section 2080.1 of the California <i>Fish and Game Code</i>. Because the Project will affect a state-listed species, the thread-leaved brodiaea, CDFG concurrence with the Project conservation measures is required. The mitigation for the thread-leaved brodiaea will include the following requirements:</p> <ul style="list-style-type: none"> • A pre-construction survey during the peak flowering period, approximately March through June, will be conducted by a qualified biologist. The limits of each brodiaea location within the impact area will be clearly delineated with lath and brightly colored flagging. • The loss of thread-leaved brodiaea will be mitigated by seed and bulb collection, and revegetation into suitable mitigation site(s). A qualified biologist shall prepare a mitigation plan for review/approval by the United States Fish and Wildlife Service and oversee its implementation. The detailed mitigation plan shall include the following requirements: <ul style="list-style-type: none"> – The known populations of thread-leaved brodiaea on the project site 					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>shall be determined and mapped as the "collection area." The collection area shall include only areas within the impact footprint.</p> <ul style="list-style-type: none"> - The existing locations of thread-leaved brodiaea shall be monitored every two weeks by a qualified biologist to determine when the seeds are ready for collection. A qualified seed collector shall collect all of the seeds from the plants within the collection area when the seeds are ripe. The seeds will be cleaned and stored by a qualified nursery or institution with appropriate storage facilities. - Following the seed collection, the bulbs shall be removed by an approved method (e.g., bulb collection or block transplantation). The bulbs shall either be transplanted directly or stored by a qualified nursery or institution with appropriate storage facilities. If the bulbs are collected and the block transplantation method is not used, then the top 12 inches of topsoil from the thread-leaved brodiaea locations shall be scraped, stockpiled, and used at the selected mitigation site. - The mitigation site(s) shall be located in open space. The site(s) shall not attempt to enhance existing populations and shall be located so as not to be impacted by any pesticides or herbicides used on adjacent properties. 					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<ul style="list-style-type: none"> - The thread-leaved brodiaea mitigation site(s) will be prepared for seeding as described in a conceptual restoration plan. - The topsoil shall be re-spread in the selected location as approved by the project biologist. Approximately 60 percent of the seeds and bulbs collected shall be spread/placed in the fall following soil preparation. Forty percent of the seed and bulbs shall be kept in storage for subsequent seeding, if necessary. - A detailed maintenance and monitoring plan shall be developed by a qualified biologist. The plan shall include detailed descriptions of maintenance appropriate for the site, monitoring requirements, and annual report requirements and shall have the full authority to suspend any operation in the study area which is, in the qualified biologist's opinion, not consistent with the restoration plan. Any disputes regarding the consistency of an action with the restoration plan will be resolved by the appropriate Project Applicant and the biologist. - The performance criteria shall be developed in the maintenance and monitoring plan and approved by a qualified biologist. The performance criteria shall also include percent cover, density, and seed production requirements. These criteria shall be developed by a qualified biologist following habitat analysis of an 					

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>existing high-quality thread-leaved brodiaea population. This information will be recorded by a qualified biologist.</p> <ul style="list-style-type: none"> - If the germination goal is not achieved following the first season, remediation measures shall be implemented prior to seeding with the remaining 40 percent of seed and bulbs. Remedial measures shall include at a minimum: soils testing, control of invasive species, soil amendments, and physical disturbance (to provide scarification of the seed) of the planted areas by raking or similar actions. Additional mitigation measures may be suggested as determined appropriate by the project biologist. - Potential seed sources from additional donor sites shall also be identified in case it becomes necessary to collect additional seed for use on the site following performance of remedial measures. <p>IWMD is currently pursuing authorization to collect seed and propagate the brodiaea as well as transplantation of the plants and soils containing plants from CDFG under Section 2081(b).</p>					
<p>Mitigation Measure MM 5.5-2 – Fairy Shrimp Surveys Prior to the initiation of construction activities that involve the removal of any pond within Zone 4, the IWMD shall have focused surveys conducted for the San Diego fairy shrimp and Riverside fairy shrimp by a biologist possessing the necessary resource agency permits. The surveys will be</p>	<p>Review of Plans and Specifications</p>	<p>Verify inclusion in Plans and Specifications</p>	<p>Prior to initiation of construction that involve the removal of any pond within Zone 4</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
<p>performed during the winter season prior to any construction activities on the site that may impact appropriate habitat for the fairy shrimp (i.e., ponds). The surveys will follow the protocol developed by the USFWS for these species. If it is determined that either or both fairy shrimp species are not present, then no further mitigation is necessary. However, if one or both fairy shrimp species are present, then consultation with the USFWS will be necessary in order to obtain a take authorization prior to any construction activities that may impact the species. The permitting process would require the preparation of a Biological Assessment which would include a mitigation plan to avoid or minimize impacts on this species.</p>					
<p>Mitigation Measure MM 5.5-3 – Western Spadefoot Toad Surveys Prior to the initiation of construction activities that involve the removal of habitat that is known and/or has the potential to support the western spadefoot toad, the IWMD shall have a focused survey conducted, where appropriate, on the project site prior to any potential impacts and during the breeding season for this species (February through May). The survey results will be submitted within 30 days after completion of the last survey to the CDFG for concurrence. Based on the May 3, 2005 survey results, a relocation program will be developed for western spadefoot on the project site. The relocation program will include a detailed methodology for locating, capturing, and relocating individuals prior to construction. The program will identify a suitable location for relocation of the western spadefoot prior to capture. The relocation program will require a biologist with the necessary permits for handling the western spadefoot. Prior to implementation of the relocation program, the program and the</p>	<p>Review of Plans and Specifications</p>	<p>Verify inclusion in Plans and Specifications</p>	<p>Prior to initiation of construction activities that involve the removal of habitat that is known and/or has the potential to support the western spadefoot toad</p>	<p>Director, IWMD or Designee</p>	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
biologist(s) implementing the program will be subject to approval of the CDFG.					
Mitigation Measure MM 5.5-4 – Existing Mitigation and Future Pre-Mitigation Any disturbance to existing or future mitigation areas, including those created by the Pre-Mitigation Plan or the Regional Environmental Enhancement Plan contained herein, shall be restored by the IWMD at the completion of the landfilling activity during the next growing season using a hydroseed mix consistent with the appropriate approved mitigation plan. All restored areas will be maintained to remove non-native invasive plant species for a maximum of three years. Implementation of this mitigation measure shall constitute full compliance with the provisions of SEIR 597 and the approved CSS/NG Mitigation Plan. No further mitigation will be assessed against IWMD by the resource agencies.	Review of Plans and Specifications	Verify inclusion in Plans and Specifications	Any disturbance to existing or future mitigation areas	Director, IWMD or Designee	
UTILITIES & SERVICE SYSTEMS					
Previously Adopted Mitigation Measures The following mitigation measures are currently in place for impacts associated with the landfill component of the 2001 GDP, as identified in EIR 575 (numerical designations are from EIR 575). All mitigation commitments contained within FEIR 575 and the 2001 GDP will apply to the Proposed Project.					
Electricity					
MM 4.16-1: Prior to approval of construction and grading plans, the IWMD will include, as part of the construction documents, requirements that the construction contractors coordinate with SCE and SDG&E to ensure that their facilities on the site are protected to prevent significant disruption to utility services during construction. The contractor will be required to provide written documentation of this coordination	Review of Plans and Specifications	Plan Check	Prior to approval of construction and grading plans	Director, IWMD/Officials of SDG&E and SCE	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
to the IWMD.					
Santa Fe Pipeline Company					
MM 4.16-2: The IWMD will coordinate with Santa Fe Pacific Pipeline Partners Inc. during final design of the landfilling uses in Zone 4 regarding the precise location and depth of the existing pipelines on the site. The IWMD shall coordinate the landfill construction schedules with Santa Fe Pacific Pipeline Partners Inc. to allow the company to relocate its pipelines, if needed, prior to IWMD initiating construction of landfilling improvements in Zone 4 that would otherwise impact these pipeline facilities.	Review of Plans and Specifications	Plan Check	During final design of landfilling uses in Zone 4	Director, IWMD or Designee	
Sanitary Facilities					
MM 4.16-3a: Prior to the commencement of any landfilling operations, a soils report and plans for all sewage disposal systems shall be submitted to the County's Plumbing/Mechanical Plan Checking Section for review and approval.	Review of Plans and Specifications	Plan Check	Prior to issuance of building permits for occupied structures	Manager, Plumbing/Mechanical Plan Checking Section	
MM 4.16-3b: Results of percolation tests and a log of soil borings, performed and reported by a Registered Environmental Health Specialist, Registered Civil Engineer or Registered Geologist, in accordance with Environmental Health's <i>On-Site Sewage Disposal System Guidelines</i> shall be submitted to the County's Plumbing/Mechanical Plan Checking Section for review and approval. The Land Use Unit of Environmental Health shall be notified at least 48 hours prior to soil testing in order to be present during testing, if deemed necessary	Review of Plans and Specifications	Plan Check	Prior to issuance of building permits for occupied structures	Orange County Plumbing/Mechanical Plan Checking Section	
MM 4.16-3c: Each proposed individual sewage disposal system shall be designed in accordance with Environmental Health's <i>On-Site Disposal System Guidelines</i> .	Review of Plans and Specifications	Plan Check	Prior to issuance of building permits for occupied structures	Manager, Environmental Health	

**TABLE 1.3-1
MITIGATION MONITORING AND REPORTING PROGRAM SUMMARY
(Continued)**

Mitigation Measure	Implementing Action	Method of Verification	Timing of Verification	Responsible Person	Date Completed
MM 4.16-3d: An additional soil percolation system, equal to a maximum of 100 percent of the original design capacity or as deemed necessary by the Manager, Environmental Health, shall be constructed and connected.	Review of Plans and Specifications	Plan Check	Prior to issuance of building permits for occupied structures	Manager, Environmental Health	
<u>Mitigation for Impacts Associated with Amendment No. 2 to the 2001 GDP</u> PDF 5.6-1: SCE and SDG&E electrical transmission facilities will be relocated or re-routed, if necessary, in order to avoid service interruptions during construction of landslide remediation measures through the center of the site. IWMD will coordinate closely with SCE and SDG&E in the development of a plan to ensure cost-effective and efficient temporary facility relocation and post-construction re-establishment of transmission lines through the site.	Review of Plans and Specifications	Verify inclusion in Plans and Specifications	Prior to approval of Plans and Specifications	Director, IWMD or Designee	

ATTACHMENT A

**Air Quality Mitigation Tables
(not included in the body of the MMRP)**

**TABLE 5.4-6
REQUIRED BEST AVAILABLE CONTROL MEASURES
(SCAQMD RULE 403, TABLE 1)**

Control Measure		Guidance
Backfilling		
01-1	Stabilize backfill material when not actively handling; and	<ul style="list-style-type: none"> • Mix backfill soil with water prior to moving • Dedicate water truck or high capacity hose to backfilling equipment • Empty loader bucket slowly so that no dust plumes are generated • Minimize drop height from loader bucket
01-2	Stabilize backfill material during handling; and	
01-3	Stabilize soil at completion of activity.	
Clearing and Grubbing		
02-1	Maintain stability of soil through pre-watering of site prior to clearing and grubbing; and	<ul style="list-style-type: none"> • Maintain live perennial vegetation where possible • Apply water in sufficient quantity to prevent generation of dust plumes
02-2	Stabilize soil during clearing and grubbing activities; and	
02-3	Stabilize soil immediately after clearing and grubbing activities.	
Clearing Forms		
03-1	Use water spray to clear forms; or	<ul style="list-style-type: none"> • Use of high pressure air to clear forms may cause exceedance of Rule requirements
03-2	Use sweeping and water spray to clear forms; or	
03-3	Use vacuum system to clear forms.	
Crushing		
04-1	Stabilize surface soils prior to operation of support equipment; and	<ul style="list-style-type: none"> • Follow permit conditions for crushing equipment • Pre-water material prior to loading into crusher • Monitor crusher emissions opacity • Apply water to crushed material to prevent dust plumes
04-2	Stabilize material after crushing.	
Cut and Fill		
05-1	Pre-water soils prior to cut and fill activities; and	<ul style="list-style-type: none"> • For large sites, pre-water with sprinklers or water trucks and allow time for penetration • Use water trucks/pulls to water soils to depth of cut prior to subsequent cuts
05-2	Stabilize soil during and after cut and fill activities.	
Demolition – Mechanical/Manual		
06-1	Stabilize wind erodible surfaces to reduce dust; and	<ul style="list-style-type: none"> • Apply water in sufficient quantities to prevent the generation of visible dust plumes
06-2	Stabilize surface soil where support equipment and vehicles will operate; and	
06-3	Stabilize loose soil and demolition debris; and	
06-4	Comply with AQMD Rule 1403.	
Disturbed Soil		
07-1	Stabilize disturbed soil throughout the construction site; and	<ul style="list-style-type: none"> • Limit vehicular traffic and disturbances on soils where possible • If interior block walls are planned, install as early as possible • Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
07-02	Stabilize disturbed soil between structures	

**TABLE 5.4-6 (Continued)
REQUIRED BEST AVAILABLE CONTROL MEASURES
(SCAQMD RULE 403, TABLE 1)**

Control Measure		Guidance
Earth-Moving Activities		
08-1	Pre-apply water to depth of proposed cuts; and	<ul style="list-style-type: none"> • Grade each project phase separately, timed to coincide with construction phase • Upwind fencing can prevent material movement on site • Apply water or a stabilizing agent in sufficient quantities to prevent the generation of visible dust plumes
08-2	Re-apply water as necessary to maintain soils in a damp condition and to ensure that visible emissions do not exceed 100 feet in any direction; and	
08-3	Stabilize soils once earth-moving activities are complete.	
Importing/Exporting of Bulk Materials		
09-1	Stabilize material while loading to reduce fugitive dust emissions; and	<ul style="list-style-type: none"> • Use tarps or other suitable enclosures on haul trucks • Check belly-dump truck seals regularly and remove any trapped rocks to prevent spillage • Comply with track-out prevention/mitigation requirements • Provide water while loading and unloading to reduce visible dust plumes
09-2	Maintain at least six inches of freeboard on haul vehicles; and	
09-3	Stabilize material while transporting to reduce fugitive dust emissions; and	
09-4	Stabilize material while unloading to reduce fugitive dust emissions; and	
09-5	Comply with Vehicle Code Section 23114.	
Landscaping		
10-1	Stabilize soils, materials, slopes	<ul style="list-style-type: none"> • Apply water to materials to stabilize • Maintain materials in a crusted condition • Maintain effective cover over materials • Stabilize sloping surfaces using soil binders until vegetation or ground cover can effectively stabilize the slopes • Hydroseed prior to rain season
Road Shoulder Maintenance		
11-1	Apply water to unpaved shoulders prior to clearing; and	<ul style="list-style-type: none"> • Installation of curbing and/or paving of road shoulders can reduce recurring maintenance costs • Use of chemical dust suppressants can inhibit vegetation growth and reduce future road shoulder maintenance costs
11-2	Apply chemical dust suppressants and/or washed gravel to maintain a stabilized surface after completing road shoulder maintenance.	
Screening		
12-1	Pre-water material prior to screening; and	<ul style="list-style-type: none"> • Dedicate water truck or high capacity hose to screening operation • Drop material through the screen slowly and minimize drop height • Install wind barrier with a porosity of no more than 50% upwind of screen to the height of the drop point
12-2	Limit fugitive dust emissions to opacity and plume length standards; and	
12-3	Stabilize material immediately after screening.	
Staging Areas		
13-1	Stabilize staging areas during use; and	<ul style="list-style-type: none"> • Limit size of staging area • Limit vehicle speeds to 15 miles per hour • Limit number and size of staging area entrances/exits
13-2	Stabilize staging area soils at project completion.	
Stockpiles/Bulk Material Handling		
14-1	Stabilize stockpiled materials.	<ul style="list-style-type: none"> • Add or remove material from the downwind portion of the storage pile • Maintain storage piles to avoid steep sides or faces
14-2	Stockpiles within 100 yards of off-site occupied buildings must not be greater than eight feet in height; or must have a road bladed to the top to allow water truck access or must have an operational water irrigation system that is capable of complete stockpile coverage.	

TABLE 5.4-6 (Continued)
REQUIRED BEST AVAILABLE CONTROL MEASURES
(SCAQMD RULE 403, TABLE 1)

Control Measure	Guidance
Traffic Areas for Construction Activities	
15-1 Stabilize all off-road traffic and parking areas; and	<ul style="list-style-type: none"> • Apply gravel/paving to all haul routes as soon as possible to all future roadway areas • Barriers can be used to ensure vehicles are only used on established parking areas/haul routes
15-2 Stabilize all haul routes; and	
15-3 Direct construction traffic over established haul routes.	
Trenching	
16-1 Stabilize surface soils where trencher or excavator and support equipment will operate; and	<ul style="list-style-type: none"> • Pre-watering of soils prior to trenching is an effective preventive measure. • For deep trenching activities, pre-trench to 18 inches soak soils via the pre-trench and resuming trenching • Washing mud and soils from equipment at the conclusion of trenching activities can prevent crusting and drying of soil on equipment
16.2 Stabilize soils at the completion of trenching activities.	
Truck Loading	
17-1 Pre-water material prior to loading; and	<ul style="list-style-type: none"> • Empty loader bucket such that no visible dust plumes are created • Ensure that the loader bucket is close to the truck to minimize drop height while loading
17.2 Ensure that freeboard exceeds six inches (CVC 23114)	
Turf Overseeding	
18-1 Apply sufficient water immediately prior to conducting turf vacuuming activities to meet opacity and plume length standards; and	<ul style="list-style-type: none"> • Haul waste material immediately off site
18-2 Cover haul vehicles prior to exiting the site.	
Unpaved Roads/Parking Lots	
19-1 Stabilize soils to meet the applicable performance standards; and	<ul style="list-style-type: none"> • Restricting vehicular access to established unpaved travel paths and parking lots can reduce stabilization requirements
19-2 Limit vehicular travel to established unpaved roads (haul routes) and unpaved parking lots.	
Vacant Land	
20-1 In instances where vacant lots are 0.10 acre or larger and have a cumulative area of 500 square feet or more that are driven over and/or used by motor vehicles and/or off-road vehicles, prevent motor vehicle and/or off-road vehicle trespassing, parking and/or access by installing barriers, curbs, fences, gates, posts, signs, shrubs, trees or other effective control measures.	

**TABLE 5.4-7
FUGITIVE DUST CONTROL ACTIONS
(SCAQMD RULE 403, TABLE 1)**

Fugitive Dust Source Category Control Actions	
Earth-moving (except construction cutting and filling areas, and mining operations)	
(1a)	Maintain soil moisture content at a minimum of 12 percent, as determined by the ASTM [American Society for Testing and Materials] method D2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations each subsequent four-hour period of active operations; OR
(1a-1)	For any earth-moving which is more than 100 feet from all property lines, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction.
Earth-moving: Construction fill areas	
(1b)	Maintain soil moisture content at a minimum of 12 percent, as determined by ASTM method D2216, or other equivalent method approved by the Executive Officer, the California Air Resources Board, and the U.S. EPA. For areas which have an optimum moisture content for compaction of less than 12 percent, as determined by ASTM Method 1557 or other equivalent method approved by the Executive Officer and the California Air Resources Board and the U.S. EPA, complete the compaction process as expeditiously as possible after achieving at least 70 percent of the optimum soil moisture content. Two soil moisture evaluations must be conducted during the first three hours of active operations during a calendar day, and two such evaluations during each subsequent four-hour period of active operations.
Earth-moving: Construction cut areas and mining operations	
(1c)	Conduct watering as necessary to prevent visible emissions from extending more than 100 feet beyond the active cut or mining area unless the area is inaccessible to watering vehicles due to slope conditions or other safety factors.
Disturbed surface areas (except completed grading areas)	
(2a/b)	Apply dust suppression in sufficient quantity and frequency to maintain a stabilized surface. Any areas which cannot be stabilized, as evidenced by wind driven fugitive dust must have an application of water at least twice per day to at least 80 percent of the unstabilized area.
Disturbed surface areas: Completed grading areas	
(2c)	Apply chemical stabilizers within five working days of grading completion; OR
(2d)	Take actions (3a) or (3c) specified for inactive disturbed surface areas.
Inactive disturbed surface areas	
(3a)	Apply water to at least 80 percent of all inactive disturbed surface areas on a daily basis when there is evidence of wind driven fugitive dust, excluding any areas which are inaccessible to watering vehicles due to excessive slope or other safety conditions; OR
(3b)	Apply dust suppressants in sufficient quantity and frequency to maintain a stabilized surface; OR
(3c)	Establish a vegetative ground cover within 21 days after active operations have ceased. Ground cover must be of sufficient density to expose less than 30 percent of unstabilized ground within 90 days of planting, and at all times thereafter; OR
(3d)	Utilize any combination of control actions (3a), (3b), and (3c) such that, in total, these actions apply to all inactive disturbed surface areas.
Unpaved Roads	
(4a)	Water all roads used for any vehicular traffic at least once per every two hours of active operations [3 times per normal 8 hour work day]; OR
(4b)	Water all roads used for any vehicular traffic once daily and restrict vehicle speeds to 15 miles per hour; OR
(4c)	Apply a chemical stabilizer to all unpaved road surfaces in sufficient quantity and frequency to maintain a stabilized surface.

TABLE 5.4-7 (Continued)
FUGITIVE DUST CONTROL ACTIONS
(SCAQMD RULE 403, TABLE 1)

Fugitive Dust Source Category Control Actions	
Open storage piles	
(5a)	Apply chemical stabilizers; OR
(5b)	Apply water to at least 80 percent of the surface area of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust; OR
(5c)	Install temporary coverings; OR
(5d)	Install a three-sided enclosure with walls with no more than 50 percent porosity which extend, at a minimum, to the top of the pile. This option may only be used at aggregate-related plants or at cement manufacturing facilities.
All Categories	
(6a)	Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 2 may be used.

**TABLE 5.4-8
CONTINGENCY CONTROL MEASURES FOR LARGE OPERATIONS
(SCAQMD RULE 403, TABLE 3)**

Fugitive Dust Source Category Control Actions	
Earth-moving	
(1A)	Cease all active operations; OR
(2A)	Apply water to soil not more than 15 minutes prior to moving such soil.
Disturbed surface areas	
(0B)	On the last day of active operations prior to a weekend, holiday, or any other period when active operations will not occur for not more than four consecutive days: apply water with a mixture of chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of six months; OR
(1B)	Apply chemical stabilizers prior to wind event; OR
(2B)	Apply water to all unstabilized disturbed areas 3 times per day. If there is any evidence of wind driven fugitive dust, watering frequency is increased to a minimum of four times per day; OR
(3B)	Take the actions specified in Table 2, Item (3c); OR
(4B)	Utilize any combination of control actions (1B), (2B), and (3B) such that, in total, these actions apply to all disturbed surface areas.
Unpaved Roads	
(1C)	Apply chemical stabilizers prior to wind event; OR
(2C)	Apply water twice per hour during active operation; OR
(3C)	Stop all vehicular traffic.
Open Storage Piles	
(1D)	Apply water twice per hour; OR
(2D)	Install temporary coverings.
Paved Road Track-Out	
(1E)	Cover all haul vehicles; OR
(2E)	Comply with the vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.
All Categories	
(1F)	Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified in Table 3 may be used.

**TABLE 5.9-1
TRACK OUT CONTROL OPTIONS**

(A) Install a pad consisting of washed gravel (minimum-size: one inch) maintained in a clean condition to a depth of at least six inches and extending at least 20 feet wide and 50 feet long.
(B) Pave the surface extending at least 100 feet and a width of at least 20 feet wide.
(C) Utilize a wheel shaker/wheel spreading device consisting of raised dividers (rails, pipe, or grates) at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.
(D) Install and utilize a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the site.
(E) Any other control measures approved by the Executive Officer and the U.S. EPA as equivalent to the methods specified items (A) through (D) above.