

EXHIBIT “A”

MITIGATION MONITORING AND REPORTING PROGRAM SAMOA PENINSULA LAND-BASED AQUACULTURE PROJECT

To avoid, reduce or mitigate significant effects resulting from the proposed Project, Public Resources Code Section 21081.6 requires that monitoring and reporting procedures take place through implementation of a Mitigation Monitoring and Reporting Program (MMRP). [Table A-1](#) provides the MMRP for the proposed Project in accordance with those guidelines.

DRAFT

ADMINISTRATIVE DRAFT – MITIGATION MONITORING AND REPORTING PROGRAM

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Mitigation Measure	Monitoring and Reporting Action	Responsible Party	Monitoring Schedule
4.3 AIR QUALITY			
AIR-1 Best Management Practices to Reduce Air Pollution The contractor shall implement the following BMPs during construction; the BMPs shall be included as notes on final construction plans: <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, active graded areas, excavations, and unpaved access roads) shall be watered two times per day in areas of active construction or as necessary. The County or NCUAQMD may require additional treatment in periods of high wind or other circumstances causing visible dust to be generated by the construction site. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • Use of mud rumbler mats will be required to reduce off-site tracking of mud and dirt. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, as necessary. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph, unless the unpaved road surface has been treated for dust suppression with water, rock, wood chip mulch, or other dust prevention measures. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 	Applicant's contractor	County and construction manager	Prior to and during Project construction

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<ul style="list-style-type: none"> • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. Clear signage shall be provided for construction workers at all access points. • Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The NCUAQMD's phone number shall also be visible to ensure compliance with applicable regulations. 			
<p>AIR-2 Best Management Practices to Reduce Asbestos Emissions During Demolition</p> <p>The contractor shall implement the following BMPs during abatement and demolition; the BMPs shall be included as notes on final demolition plans:</p> <ul style="list-style-type: none"> • Work impacting material containing less than 1% asbestos (unclassified work) shall be performed using Class II asbestos work protocols, at a minimum, as outlined in 8 CCR 1529.8. • All interior work impacting asbestos, including Class II and unclassified work, shall be performed within sealed negative-pressure containments. • Negative-pressure containments established at the interior of a structure shall be constructed and vented to the exterior in accordance with 8 CCR 1529. • If additional suspect asbestos material is discovered during site work, then work in that area shall stop, the 	Applicant's contractor	County and construction manager	Prior to and during Project construction

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<p>material wetted, and access to the area restricted until an appropriate asbestos characterization can be made.</p>			
<p>4.4 BIOLOGICAL RESOURCES</p>			
<p>BIO-1 Implementation of Compensatory Mitigation for Loss of Dark-eyed Gilia</p> <p>Loss of dark-eyed gilia habitat shall be mitigated through compensatory mitigation at a ratio of no less than 3:1 (area) through the implementation of a Restoration and Monitoring Plan (RMP), subject to review and approval of the Planning and Building Department after consultation with the California Department of Fish and Wildlife (CDFW). Both on-site and off-site methods, success criteria, monitoring requirements, and reporting requirements for mitigation shall be conducted as followed:</p> <ul style="list-style-type: none"> • Pre-construction (non-native removal) surveys for rare plants, including dark-eyed gilia, shall occur at both on-site and off-site mitigation areas identified in the RMP. • Sensitive dark-eyed gilia habitats will be marked with flagging and signage prior to replanting designated on-site restoration areas to avoid disturbing the rare plant population. 	<p>Applicant's contractor</p>	<p>County and construction manager</p>	<p>Before and during Project construction</p>

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<ul style="list-style-type: none"> • The established dark-eyed gilia population to be preserved on-site and translocation macroplots shall be searched for dark-eyed gilia during the blooming period. Macroplots measuring approximately 100 square meters (m²) are to be established at the time of translocation in the best available habitat at each of the off-site properties (USFWS, FOD, MCSD, and HBHD), and these will be marked by GPS in the field. • Successful mitigation of impacts to dark-eyed gilia is defined by protecting the remaining rare plant habitat along the southern boundary and translocating the population from the project footprint to suitable restored off-site habitat. • Annual success is defined by the presence of dark-eyed gilia with no minimum count, but population counts inform whether supplementation with additional seed collection may be needed to maintain a viable population. • Monitoring shall be implemented for a 5-year period. Year 1: Dark-eyed gilia seeds will be collected from the Project footprint and broadcast at designated restoration macroplots. The remaining population outside of the footprint will be preserved. Year 2-5: Dark-eyed gilia plants detected at or near designated macroplots and at or near Native Plant Protection Area on-site shall indicate success. Annual monitoring will begin by navigating by GPS to the established macroplots. Transects spaced every 3m will be carefully walked to 			

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<p>search for and count dark-eyed gilia plants. If plants become too numerous to reliably count, a systematic sampling scheme may be implemented to obtain a good population estimate. The assessment of population health and adaptive management recommendations for additional reseeded shall be included in annual reports submitted to the Planning and Building Department for approval.</p>			
<p>BIO-2 Protect Special Status Terrestrial Mammals The construction plans will specify that steep-sided excavations capable of trapping mammals shall be ramped or covered if left overnight. No pets (i.e., dogs) shall be allowed on the Project Site. No poisons (including anticoagulant rodenticides) or other potentially injurious materials attractive to mammals shall be utilized or left unattended during construction or operation activities.</p>	Applicant's contractor	County and construction manager	During Project construction
<p>BIO-3 Protect Special Status Bats Two additional surveys of the interiors of the three previously occupied structures shall be conducted by a qualified bat biologist; one in late April or early May when likely occupied by females just before or after parturition, and one in mid-June when pups would be present.</p> <p>If maternity colonies are present, demolition activities shall first be conducted on structures located furthest from the occupied structures (>500' – e.g. Machine Building) and limited to mechanical removal only (no explosives) until after young are self-sufficiently volant. After that time and after non-occupied</p>	Applicant's contractor	County and construction manager	Before and during Project construction

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<p>structures are removed, specific measures to cause bats to safely abandon the occupied roosts would be conducted between September 1 and about October 15, or between about March 1 and April 15, at which time explosives could be used for demolition.</p> <p>If day roosts are occupied only by males or by non-reproductive females, demolition of structures further than 300' should first be conducted since no non-volant bats would be present. After non-occupied structures are removed, specific measures to cause bats to safely abandon the occupied roosts would be conducted between September 1 and about October 15, or between about March 1 and April 15.</p> <p>The following protocol shall be adhered to:</p> <p>1) The following buildings will be removed as part of first phase of demolition:</p> <ul style="list-style-type: none"> a. Machine Building b. Warehouse c. Existing Offices d. Brick Silos (all) e. Structure (concrete) f. Structure 2 (concrete) g. 3-Story Boiler Building h. 2-Story Building Near Smokestack i. Elevated Water Tanks 			

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<p>2) Following removal of the Buildings above, the Smokestack, 12-Story Boiler Building (using explosives/conventional demolition), and Concrete Foundations Structures and Footings may be removed <i>only</i>:</p> <ul style="list-style-type: none"> a. During seasonal periods of bat activity: <ul style="list-style-type: none"> i. Between about <u>March 1</u> (or after evening temperatures 1-2 hours before sunset rise above 45F and/or no more than 1/2" of rainfall occurs 24 hours before or after planned habitat removal), and <u>April 15</u>, or; ii. Between <u>September 1</u> and about October <u>15</u>, but only when evening temperatures 1-2 hours before sunset are above 45F and/or no more than 1/2" of rainfall occurs 24 hours before or after planned habitat removal. <p>3) Follow these procedures for Pump House (SUB BF2), SUB FL.2, and Filter/Softener Tank Building:</p> <ul style="list-style-type: none"> i. Open all doors. ii. Remove louvered vents if present and any window covers. iii. Install LED work lights aimed toward ceiling throughout building in quantity noted for each building; operate only during nighttime hours, switching off each morning. 			

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<ul style="list-style-type: none"> iv. Install large (24" – 36" diameter) air circulating fans aimed towards ceilings (1 for each enclosed space); operate only during nighttime hours, switching off each morning. v. Conduct a follow-up survey 4-7 nights after steps i-iv above; <ul style="list-style-type: none"> a) If bats are present, a qualified bat biologist will recommend additional actions to cause bats to abandon the roosts. b) If no bats are present, begin demolition of buildings within 7 days. 			
<p>BIO-4 Protect Special Status Amphibians</p> <ul style="list-style-type: none"> • No more than one week prior to commencement of ground disturbance within 50 feet of suitable NRLF habitat (e.g., pools, riparian areas, damp meadows), a qualified biologist shall perform a pre-construction survey for NRLF and shall relocate any individuals or egg masses that occur within the work-impact zone to nearby suitable habitat. • If any NRLF are observed during the pre-construction survey, CDFW shall be consulted to determine the best way to avoid impacts to NRLF. Ground-disturbing activities should be conducted during the dry season (May 15-October 15) to minimize take of NRLF. If construction activities are conducted within the dry 	Applicant's contractor	County and construction manager	Before and during Project construction

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<p>season (May 15-October 15), exclusion fencing shall be installed around the work area prior to October 15 to prevent NRLF from migrating into work areas. The fencing material and design shall be reviewed and approved in writing by CDFW before installation.</p> <ul style="list-style-type: none"> • In the event a NRLF is encountered on-site during construction, all construction activities will cease until the animal has left the Project area on its own and is no longer in danger of harm. The project construction manager or project biologist will report the sighting to CDFW within 24 hours. No one other than a CDFW-approved biologist is permitted to handle or capture NRLF, and NRLF will not be taken or harassed. • An Environmental Awareness Training will be provided to the construction crew prior to the commencement of construction activities. This “tailgate” training is intended to enable the construction crew to be able to identify NRLF and to safely relocate them outside of the Project Site. 			
<p>BIO-5 Protect Special Status, Migratory, and Nesting Birds Ground disturbance (i.e., ground densification and building demolition) and vegetation clearing shall be conducted, if possible, during the fall and/or winter months and outside of the avian nesting season (March 15 – August 15) to avoid any direct effects to special status and protected birds. Prior to the issuance of a any construction or demolition permit and/or commencing of densification, ground disturbance, and/or</p>	Applicant’s contractor	County and construction manager	Before Project construction

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<p>vegetation clearing, the applicant shall submit a construction timeline indicating dates of work to be implemented to the Planning and Building Department for approval.</p> <p>If ground disturbance cannot be confined to work outside of the nesting season, a qualified ornithologist shall conduct pre-construction surveys within the vicinity of the Project Site to check for nesting activity of native birds and to evaluate the site for presence of raptors and special status bird species in the buildings subject for demolition. The ornithologist shall conduct at minimum a one-day pre-construction survey within the 7-day period prior to vegetation removal and ground-disturbing activities. If ground disturbance or vegetation removal work lapses for seven days or longer during the breeding season, a qualified ornithologist shall conduct a supplemental avian pre-construction survey before Project work is reinitiated.</p> <p>If active nests are detected within the construction footprint or up to 500 feet from construction activities, the ornithologist shall flag a buffer around each nest (assuming property access). A plan showing the buffer shall be submitted to the Planning and Building Department prior to commencement of construction activities. Construction activities shall avoid nest sites until the ornithologist determines that the young have fledged, or nesting activity has ceased. If nests are documented outside of the construction (disturbance) footprint, but within 500 feet of the construction area, buffers will be implemented as needed (buffer size dependent on species). Buffer sizes for common species would be determined on a case-by-case basis in consultation with the CDFW and, if applicable, with USFWS. Buffer sizes will take into account factors such as (1) noise and</p>			

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<p>human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; (2) distance and amount of vegetation or other screening between the construction site and the nest; and (3) sensitivity of individual nesting species and behaviors of the nesting birds.</p> <p>If active nests are detected during the survey, the qualified ornithologist shall monitor all nests at least once per week to determine whether birds are being disturbed. Activities that might, in the opinion of the qualified ornithologist, disturb nesting activities (e.g., excessive noise), shall be prohibited within the buffer zone until such a determination is made. If signs of disturbance or distress are observed, the qualified ornithologist shall immediately implement adaptive measures to reduce disturbance. These measures may include, but are not limited to, increasing buffer size, halting disruptive construction activities in the vicinity of the nest until fledging is confirmed or nesting activity has ceased, placement of visual screens or sound dampening structures between the nest and construction activity, reducing speed limits, replacing and updating noisy equipment, queuing trucks to distribute idling noise, locating vehicle access points and loading and shipping facilities away from noise-sensitive receptors, reducing the number of noisy construction activities occurring simultaneously, and/or reorienting and/or relocating construction equipment to minimize noise at noise-sensitive receptors. Upon completion of the survey, a memo will be provided to the Planning and Building Department that will describe the methods and results of the survey and any related recommendations. All requirements and recommendations of the ornithologist shall be conditions of the Coastal Development Permit and shall be incorporated into the construction plans.</p>			

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<p>BIO-5a Limits on Soil Densification Construction to Avoid Impacts to Marine Mammals</p> <p>When soil densification construction occurs within the Phase 2 Grow-Out Module footprint as shown in Image 4-1 above (Illingworth and Rodkin 2020, Appendix J), soil densification shall only occur when the tidal surface water elevation is below the 330-foot (100 meter) radius where Level B injury could occur. Final construction plans shall show the tidal elevation that corresponds with the 330-foot radius shown in Figure 2 of the Project’s Hydroacoustic, Noise, and Vibration Assessment (Illingworth and Rodkin 2020, Appendix J). In addition, final construction plans shall also show the explicit portion of the Phase 2 Grow-Out Module required to adhere to soil densification construction during low tide conditions.</p>	Applicant’s contractor	County and construction manager	During Project construction
<p>BIO-6a Implement Compensatory Mitigation for Sensitive Natural Communities</p> <p>Loss of Sensitive Natural Communities (shall be mitigated through compensatory mitigation based on the ratios (acreages) stated below. Mitigation shall include removal of invasive European beachgrass, yellow bush lupine scrub, and other non-natives on- and off-site in locations where restoration planting is being conducted. On-site restoration is preferred.</p> <ul style="list-style-type: none"> • Coastal Brambles: No less than 3:1, on-site only • Dune Mat: No less than 2:1, on-site and off-site (BIO-1 can be combined with this requirement in which case the mitigation ratio is 3:1) <p>Pre-construction surveys for rare plants shall occur at both on-site and off-site mitigation areas, as identified in the RMP.</p> <p>Annual success criteria shall be defined as follows:</p>	Applicant’s contractor	County and construction manager	During and after Project construction

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Invasive Vegetation	1	≥50% Reduction in target invasive plant cover (absolute) at dune restoration sites.			
	2	≥65% Reduction in target invasive plant cover at dune restoration sites.			
	3	≥80% Reduction in target invasive plant cover at dune restoration sites.			
	4	≥90% Reduction in target invasive plant cover at dune restoration sites.			
	5	≥95% Reduction in target invasive plant cover at dune restoration sites.			
Native Dune Mat	5	Dune restoration areas (at all sites) are dominated by native dune mat species (≥50% relative percent cover).			
Native Coastal Brambles	5	Coastal brambles restoration areas are dominated by native species associated with the community (≥50% relative percent cover).			
Maint.	All Yrs	The restoration crew completed invasive plant removal on schedule.			
BIO-6b	Construction Protocol for Protection of ESHA Prior to issuance of any permits, orange net or other appropriate fencing shall be placed around the 35 foot' ESHA setback or at the limit of the Fire Road encroachment. The fencing shall remain in place throughout the construction period to prevent vehicles, equipment, or materials from entering the ESHA. The grading plans for the project site shall design finished pad grades to not result in grade changes at the edge of the buffer or fire road within the ESHA buffer.		Applicant's contractor	County and construction manager	During Project construction
4.5	CULTURAL RESOURCES				

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<p>CR-1 Implementation of Protocols for Cultural Monitoring During Ground Disturbance NAFC shall retain a qualified cultural resource monitor who is approved by the Wiyot Tribe, Bear River Band of the Rohnerville Rancheria, and the Blue Lake Rancheria to monitor ground disturbing activities related to this Project in areas the Tribes deem culturally sensitive. The three Tribal Historic Preservation Officers or their functional equivalent shall be contacted to set up and implement a cultural monitoring contract when a construction schedule has been determined. Advanced coordination with the qualified cultural monitor is required. As landowner, the Humboldt Bay Harbor, Recreation, and Conservation District (landowner) shall be provided with written verification for compliance. NAFC shall adhere to the Standard Operating Procedures for Inadvertent Archaeological Discovery (General), as detailed in the Archaeological and Historical Resource Investigation Report prepared for the Project by Roscoe and Associates (2020).</p>	Applicant or Applicant's contractor	County and construction manager	During Pre-construction
<p>CR-2 Implementation of Inadvertent Discovery Protocols If cultural or historic-era resources are encountered during construction activities, the contractor on-site shall cease all work in the immediate area and within a 50-foot buffer of the discovery location. A qualified archaeologist, as well as the Tribal Historic Preservation Officers for the Bear River Band Rohnerville Rancheria, Blue Lake Rancheria, and Wiyot Tribe shall be contacted to evaluate the discovery and, in consultation with the applicant and lead agency, develop a treatment plan in any instance where significant impacts cannot be avoided. The Humboldt Bay Harbor, Recreation, and Conservation District (landowner) shall also be notified. In the event of inadvertent discoveries, the Standard Operating Procedures as outlined by</p>	Applicant's contractor	County and construction manager	During Project construction

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<p>Roscoe and Associates (2020) shall be followed. NAFC shall adhere to the Standard Operating Procedures for Inadvertent Archaeological Discovery (General) and Standard Operating Procedures for Documenting Inadvertent Archaeological Discoveries, as detailed in the Archaeological and Historical Resource Investigation Report prepared for the Project by Roscoe and Associates (2020).</p>			
<p>CR-3 Minimize Impacts to Unknown Archaeological Resources or Human Remains if Encountered If human remains are discovered during Project implementation, all work shall be halted and the Humboldt Bay Harbor, Recreation, and Conservation District (landowner) and tribal representatives shall be contacted immediately. The Humboldt Bay Harbor, Recreation, and Conservation District shall contact the County Coroner immediately and the Coroner would evaluate the find to determine the subsequent course of action, including notification of tribal representatives. In the event of inadvertent discoveries, the Standard Operating Procedures as outlined by Roscoe and Associates (2020) shall be followed, including Standard Operating Procedures for Inadvertent Discovery of Native American Remains and Grave Goods.</p>	<p>Applicant's contractor</p>	<p>County, construction manager</p>	<p>During Project construction</p>
<p>4.7 GEOLOGY AND SOILS</p>			
<p>GEO-1 Implement Geotechnical Recommendations As part of the Project design process, NAFC has engaged a California-registered Geotechnical Engineer to conduct a design-level geotechnical study for the Project. NAFC will ensure that the Project is designed to comply with the site-specific recommendations identified in the Project's geotechnical report prepared for the Project by SHN (2020) and</p>	<p>Applicant's contractor</p>	<p>County, construction manager</p>	<p>Before Project construction</p>

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<p>any subsequent geotechnical recommendations prepared as the Project’s design advances. Geotechnical recommendations require designs in accordance with the seismic and foundation design criteria, as well as site preparation and grading recommendations included in the report. The geotechnical recommendations will be incorporated into the final plans and specifications for the Project and will be implemented during construction.</p>			
<p>GEO-2 Construction Best Management Practices The contractor will implement BMPs during construction, including the following BMPs from the current California Stormwater BMP Handbook for Construction: EC-1: Scheduling; EC-2: Preservation of Existing Vegetation; NS-2: Dewatering Operations; NS-9: Vehicle Equipment and Fueling; NS-10: Vehicle & Equipment Maintenance; WM-2: Material Use; WM-4: Spill Prevention and Control. Additionally, the following conditions will be required during construction:</p> <ul style="list-style-type: none"> • Silt fences will be deployed as needed at onshore construction areas to prevent any sediment from flowing into Humboldt Bay. Required silt fence and erosion control locations and specifications for installation shall be included in the final construction plan set. If the silt fences are not adequately containing sediment, construction activity will cease until remedial measures are implemented that prevents sediment from entering the waters east of the construction area; • Construction materials and debris will not be placed or stored where it may be allowed to enter into or washed by rainfall into Humboldt Bay; 	<p>Applicant’s contractor</p>	<p>County, construction manager</p>	<p>During Project construction</p>

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<ul style="list-style-type: none"> • Best Management Practices (BMPs) will be implemented to prevent: 1) entry of stormwater runoff into Humboldt Bay during construction, 2) the entrainment of excavated contaminated materials leaving the site, and 3) the entry of polluted stormwater runoff into coastal waters during the transportation and storage of excavated materials. These BMPs will be included in the Stormwater Pollution Prevention Program (SWPPP), which is required for the Project (see Section 4-10 – Hydrology and Water Quality); • Non-essential work vehicles and equipment will be parked at least 100 feet away from the shoreline; • Sufficient erosion control supplies will be maintained on-site at all times, available for prompt use in areas susceptible to erosion during rain events; • Disturbance of existing vegetation will be minimized to only that necessary to complete the work; • The contractor, including sub-contractors, shall be required to provide employee training in spill prevention prior to construction. The contractor shall also be required to provide equipment to contain oil and/or other hazardous materials spills. Spill prevention and response requirements shall be included in the final construction plan set; • Dewatering operations will be conducted where needed from the work location and stored or disposed of appropriately. Any groundwater encountered during demolition and construction that requires removal would be pumped into appropriate containers, such as Baker tanks for characterization. Excavation depths for construction are not anticipated to extend to groundwater and the use of 			

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<p>dewatering wells for the Project is not planned (SHN 2021b). Water sourced from dewatering would not be discharged to on-site one-parameter wetlands or Humboldt Bay to cause polluted runoff; groundwater recharge would continue to occur via the dewatering wells;</p> <ul style="list-style-type: none"> • Vehicle and equipment maintenance should be performed off-site whenever practical and shall not occur adjacent to Humboldt Bay or sensitive habitats; • As required in the SWPPP, contractor shall ensure that the site is prepared with BMPs prior to the onset of any storm predicted to receive 0.5 inches or more of rain over 24 hours; • All erosion and sediment control measures shall be maintained in accordance to their respective BMP fact sheet until disturbed areas are stabilized. Erosion and sediment control measures shall be explicitly included in the final construction plan set; and • This plan may not cover all the situations that arise during construction due to unanticipated field conditions. Variations may be made to the plan in the field subject to the approval of or at the direction of NAFC Project Manager or Construction Manager. 			
<p>GEO-3 Inadvertent Discovery of Paleontological Resources In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional palaeontologist shall be notified to document the</p>	Applicant's contractor	County, construction manager and potentially the SLC	During Project construction

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<p>discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the palaeontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The palaeontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they would be properly curated and preserved.</p>			
<p>4.9 HAZARDS AND HAZARDOUS MATERIALS</p>			
<p>HAZ-1 Implement Recommendations of Interim Measures Work Plan To address historic soil and groundwater contaminants remaining at the Project Site from historic use, the Project will implement recommendations included in the Interim Measures Work Plan developed by SHN (2020b). Interim measures included in the plan include documentation of modifications to the existing Monitoring and Reporting Program administered by the North Coast Regional Water Quality Control Board (NCRWQCB), compliance with the SWPPP program, development of a Sampling and Analysis Plan approved by the NCRWQCB, and preparation of a Health and Safety Plan, and a Soil Gas Monitoring Program evaluation as it pertains to the Samoa Solid Waste Disposal Site located west of the Project Site. Interim measures also include recommendations for structure demolition, excavation of soils, dewatering, soil testing, field screening, laboratory testing, quality assurance/quality control, and reporting that will be</p>	<p>Applicant's contractor</p>	<p>County, construction manager</p>	<p>Before and during Project construction</p>

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implemented by the Project.			
4.10 HYDROLOGY AND WATER QUALITY			
HWQ-1 Implement Stormwater Protection Pollution Prevention Plan (SWPPP) The Project will seek coverage under State Water Resources Control Board (Water Board) Order No. 2009-0009-DWQ, Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction and Land Disturbance Activities. NAFC will submit permit registration documents (notice of intent, risk assessment, site maps, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and certifications) to the Water Board. The SWPPP will address pollutant sources, BMPs, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and ensuring overall compliance.	Applicant's contractor	County and construction manager	Prior to and during Project construction