



The City of Morro Bay

595 Harbor Street
Morro Bay, CA 93442

01/31/2024

Leilani Takano
Assistant Field Supervisor
United States Fish and Wildlife Service
Ecological Services
Ventura Fish and Wildlife Office
2493 Portola Road, Suite B
Ventura, California 93003

Subject: 2023 Yearly Report for the City of Morro Bay Water Reclamation Facility Project Biological Opinion

Dear Ms. Takano,

Please accept the below and attached information intended to provide compliance with the following requirement encompassed in the Biological Opinion (08EVEN00-2020-F-0010; BO) as amended on January 6, 2021 and January 14, 2022 for the subject Project.

Excerpt: Biological Opinion of the City of Morro Bay's Water Reclamation Facility Project dated February 20, 2020 (Page 31):

REPORTING REQUIREMENTS

Pursuant to 50 CFR 402.14(i)(3), EPA must report the progress of the action and its impact on the species to the Service as specified in this incidental take statement. The applicant, through a qualified botanist, will monitor the success of revegetation actions on areas of temporary disturbance for a period of 5 years after revegetation takes place. The EPA or applicant will provide yearly reports to the Service by January 31 of each year during the construction phase of the project. These reports will include the number and age class of California red-legged frogs that have been captured and relocated, and that have been found injured or dead. These reports will also include the dates and results of inspections of the chain link fence, as well as any repairs that were made to the fence, an analysis of whether the chain link fence is successful in excluding California red-legged frogs, and any suggestions to improve the efficacy of the fence.

The City has continued to provide the USFWS with quarterly updates for the Project elements, which include the Water Reclamation Facility, Lift Station and Offsite Pipelines (Conveyance Facilities), and the Recycled Water Facilities. In addition to this information, the following Year 2023 Annual Reporting information pertaining to the Biological Opinion is as follows:



1. *Project Construction Summary:* As detailed in the first annual report prepared in 2020, project biologists were approved by USFWS prior to initiating work under the Biological Opinion. Work at the Facility site commenced in March 2020, and the majority of all site surface disturbance from grading was completed in 2021. All major construction activities were essentially completed in Summer of 2022 with plant start up occurring in October 2022 and punchlist closeout well into 2023. Throughout construction all work occurred generally within areas previously disturbed during initial site grading. These areas were surveyed repeatedly by project biologists for special status species and common wildlife prior to and during all work outside the facility fencing. The only work that occurred in 2023 outside the fencing included work to repair the hillside drainage features after a major storm event in January 2023. Biological monitoring continued on an as-needed basis during 2023 to facilitate any required monitoring for small construction activities. Most work occurred within the fenced site therefore requiring spot checks as needed prior to and after construction. Consistent with the 2020, 2021, and 2022 monitoring effort, no California red-legged frogs were observed in the WRF project disturbance zone or in the adjacent Drainage 3 corridor during the monitoring work. In addition, no other special status species such as American badger were observed in the project area, and regular monitoring confirmed no nesting birds were affected by project activities.

The project biologist required replantings as necessary to ensure the BO requirements were met in the area just east of the project site adjacent to the natural drainage feature. The year one biological monitoring report is attached to this report. Additionally, the Contractor attempted to establish hydroseed in late summer 2022, however given drought conditions was unable to provide an adequate level of established grasses prior to the 2022-2023 rainy season. Currently to ensure that the natural grasses are established, the Contractor has installed a temporary irrigation line system to ensure that erosion control grasses are established prior to the 2023-2024 rainy season.

Upon substantial completion of the WRF, the planting of the riparian enhancement plan areas occurred in September 2022 and closely monitored by the Project biologist. Upon initial planning, a heat wave occurred when the irrigation system was not fully functional resulting in approximately 50% loss of the planted materials. Furthermore, the entire fill slope and all disturbed areas around the facility were hydroseeded to provide ground cover for erosion protection. Due to drought and topsoil conditions, some areas had poor germination of seeded material and low cover. These locations had additional treatments of compost and were seeded again with serpentine tolerant species to increase vegetation cover on the steeply cut hillside above the facility. Areas with exposed bedrock were left since the erosion potential was deemed to be low and vegetation cover was consistent with nearby reference locations with similar soil composition.

The City experienced an above average volume of rain during the early part of the year and experienced significant storm events that caused damage to the WRF western hillside drainage system. Significant erosion damage occurred on the existing hillslope and drainage facilities were repaired in preparation of continuous rainfall during the early spring 2023. Monitoring continued to occur prior to, during and after rainfall events on an as needed basis providing spot checks throughout the site outside of the WRF fence. Even though major construction activities were complete, with the erosion damage repaired and

monitoring continued as needed throughout 2023 active construction was consistent with the BO and supporting documents.

The conveyance element of the project commenced in 2021, Pre-construction activity surveys continued on an as-needed basis in coordination with the contractor to make sure surveys occurred no more than 48 hours before the onset of construction activities. The majority of all major construction was completed in November of 2022, therefore construction activities within 2023 were very minor fixes affecting only surface features within City streets were performed to close out the punchlist.

In summary, no red-legged frogs, Morro shoulderband snails, tidewater gobies or other special status species (i.e., American badger or nesting birds) have been observed, captured, or relocated from the site during the 2023 reporting period. Furthermore, no nesting birds or any wildlife impacts were observed during the 2023 construction phase. Environmental awareness trainings also occurred on an as-needed basis throughout the project site to help the contractor implement avoidance and minimization measures developed to protect biological resources. Project biologists continue to work with the construction team to conduct pre-activity surveys, inspect the exclusion fencing at the WRF, provide environmental awareness training, and help them adhere to all avoidance and minimization measures detailed in the BO and project EIR. The contractor has completed with revegetation (hydro-seeding native species seed mix) of disturbed areas including the CA-Route 1 at Atascadero Road S/B on-ramp embankment, and the City Bike Path 70-ft wide easement

2. *Revegetation Action:* The 19.5-acre on-site conservation area is a post construction component of the project that will be established, maintained and monitored by the City once construction has reached final completion. As of this report, the conservation easement has not been fully executed, due to the drainage feature remediations taking place in 2023. Lastly, as previously mentioned, the implementation of the REP has occurred with the installation of a temporary irrigation system, application of the native erosion control seed mix below the facility in the Temporary Construction Easement, and installation appropriate plantings. Maintenance and monitoring of the planted and seeded material has commenced consistent with methods and techniques established in the REP. The year one required annual report documented successful implementation of the REP, and is attached to this document.

3. *Federal Listed Species Take Status:*
California Red-Legged Frog Take Status:
 - a. Captured and relocated: 0 (zero)
 - b. Found injured or dead: 0 (zero)

Morro Shoulderband Snail Take Status:

- a. Captured and relocated: 0 (zero)
- b. Found injured or dead: 0 (zero)

Tidewater Goby Take Status:

- a. Captured and relocated: 0 (zero)
- b. Found injured or dead: 0 (zero)

4. Perimeter Chain Link Fence Status: The WRF site permanent perimeter chain link fence with slats has been erected and completed. The temporary wildlife exclusion fencing that includes a combination silt fence barrier, will now be removed from the 27 acre WRF site, as the project grading work is completed and permanent exclusion fence is in place and functional. The entire property is also surrounded by a five strand barbwire fence, and the temporary construction perimeter fencing has been removed.

5. Biological Training: All construction workers and administrative staff working on the project have attended an Environmental Awareness Training developed and presented by the City's Service Approved Biologist. The contractors for the WRF and conveyance elements have designated personnel that have received additional training by the project biologists so they can provide additional trainings to new personnel as needed. Sign-in sheets documenting their attendance are being collected and retained for each training session and are made a part of each employee's file. Project hardhat stickers are issued once training is completed to denote compliance. Morning tailgate sessions are also conducted regularly to review pertinent information when working adjacent to sensitive habitat areas such as stream courses.

If you have any questions on the above or the attached report, please do not hesitate to contact me at acemo@carollo.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'Anthony Cemo', with a long horizontal line extending to the right.

Anthony Cemo
WRF Program Project Engineer

Attachment 1: Quarterly Progress Status Report to Funding/Regulatory Agencies (Combined Report) - Reporting Period October 1, 2023 through December 31, 2023.

Attachment 2: Year One Riparian Enhancement Area Monitoring Report.

ATTACHMENT 1



City of Morro Bay
Water Reclamation Facility Project

QUARTERLY PROGRESS STATUS REPORT TO FUNDING / REGULATORY AGENCIES (COMBINED REPORT)

REPORTING PERIOD
October 1, 2023 through December 31, 2023





City of Morro Bay
Water Reclamation Facility Project

QUARTERLY PROGRESS STATUS REPORT
TO FUNDING / REGULATORY AGENCIES
(COMBINED REPORT)

REPORTING PERIOD
OCTOBER 1, 2023 THROUGH DECEMBER 31, 2023

Clean Water State Revolving Fund (CWSRF) Planning Loan Agreement No. D16-01016

Water Infrastructure Finance and Innovation Act (WIFIA)
Funding Agreement No. N17150CA (Water) / No. N17108CA (Wastewater)

CWSRF Funding Agreement No. (SWRCB0000000000D2001033)



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Abbreviations

AA	average annual
AOP	advanced oxidation process
APCD	Air Pollution Control District
B&V	Black & Veatch Corporation
BMP	best management practice
BNR	biological nutrient removal
BR	brine
CA-SLO	California-San Luis Obispo
Carollo	Carollo Engineers, Inc.
CDFW	California Department of Fish and Wildlife
City	City of Morro Bay
CMU	concrete masonry unit
COVID-19	Coronavirus Disease 2019
CPM	critical path method
CWSRF	Clean Water State Revolving Fund
DB	design-build
DDW	Division of Drinking Water
Filanc	J.R. Filanc Construction Company, Inc.
FO	fiber optic
GMP	guaranteed maximum price
GSI	GSI Water Solution, Inc.
H ₂ O	Water
HDPE	high-density polyethylene
IPR	indirect potable reuse
LF	linear foot
LOTO	lockout tagout
LS	lift station
MBR	membrane bioreactor
MGD	million gallons per day
MH	manhole
Misc.	miscellaneous
MTBM	Microtunnel Boring Machine
NEMA	National Electrical Manufacturers Association
NPDES	National Pollutant Discharge Elimination System
NTP	notice to proceed
OCI	Overland Contracting, Inc.

PG&E	Pacific Gas & Electric
PCO	potential change order
PLC	programmable logic controller
PS	pump station
RFI	request for information
RO	reverse osmosis
R/W	Right of way
RWQCB	Regional Water Quality Control Board
SAFE	Stormwater Auxiliary Filtration Equipment
SCADA	supervisory control and data acquisition
SD	storm drain
SLO	San Luis Obispo
SHPO	State Historical Preservation Officer
SHT	Sludge Holding Tank
SLO	San Luis Obispo
SRF	State Revolving Fund
SWRCB	State Water Resources Control Board
SWPPP	stormwater pollution prevention plan
TCP	Traffic Control Plan
TSO	Time Schedule Order
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UV	ultraviolet
Vdc	volts, direct current
WIFIA	Water Infrastructure Finance and Innovation Act
WRC	Water Resource Center
WRF	Water Reclamation Facility
WWTP	wastewater treatment plant

Section 1

PROJECT OVERVIEW

1.1 General Project Status Update

Since 2013, the City of Morro Bay (City) has been developing a Water Reclamation Facility (WRF) project through the completion of several key planning milestones including completion of the Draft Water Reclamation Facility Master Plan and Draft Master Water Reclamation Plan. These planning documents along with City Council-adopted goals for the project have outlined a project that includes the following major components:

- Onsite tertiary treatment facility with a capacity of approximately 1 mgd. This facility was previously known as the WRF and the City recently renamed the facility the Water Resource Center (WRC). For the remainder of this document, the treatment facility will be referred to WRC.
- Onsite full advanced treatment facilities capable of meeting the State Division of Drinking Water's requirements for potable reuse via groundwater augmentation.
- Offsite raw wastewater conveyance facilities including pipelines and two pump stations to convey raw wastewater, tertiary-treated wastewater, and brine between the existing wastewater treatment plant (WWTP) site and the City's WRC located at Highway 1 and South Bay Boulevard (Conveyance Facilities).
- Offsite recycled potable reuse facilities including pipelines and injection wells necessary for groundwater augmentation in the Morro groundwater basin. (Recycled Water Facilities).

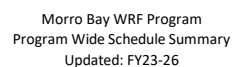
"Our Water" is the City's program to plan and build water and wastewater infrastructure for a sustainable future for the environment, economy, and the community. This report summarizes key accomplishments and challenges during the reporting period of October 1, 2023 through December 31, 2023.

1.2 Current Project Schedule

In June 2018, the City received a Time Schedule Order (TSO) from the Regional Water Quality Control Board (RWQCB) that requires the City to achieve full operation of new wastewater treatment facilities by February 28, 2023, encompassing the WRC project (by Design-Build) and the Conveyance Facilities project (by conventional design-bid-build) including all off-site pipelines and pump stations. The overall program schedule is shown in the figure below. The current construction schedule progress percent complete to-date per contract is 118 percent for the WRC and 150 percent for Conveyance. The current final completion dates for the projects are August 31, 2023 (past) for the WRC project (extension part of FBV Amendment No. 9), and December 1, 2022 (past) for the Conveyance Project. As described in the specific sections below, the final completion for both the WRC and the Conveyance is subject to final contract closeout negotiations.

While both WRC and Conveyance Projects' Final Completion Dates are to occur after the TSO deadline, the City has already achieved the milestone requirement of full operation of the wastewater treatment facilities in compliance with permits and regulatory requirements. The milestone goal was achieved during a phased start-up of the various facilities during October and November 2022.

The Recycled Water Facilities component of the WRF Program, which includes construction of injection wells and recycled water pipelines is not tied to the TSO compliance date and is currently proceeding through the permitting and design process. The current estimated date for substantial completion of the Recycled Water Facilities is July 2026.



Section 2

WATER RESOURCES CENTER (WRC)

2.1 Construction Progress Report – Reporting Period: October 1 to December 31, 2023

2.2 Project Summary

This quarterly progress report summarizes the project construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

Table 1 WRC Project Summary

Item	Description
Public Agency Owner	City of Morro Bay (City)
Design-Build Joint Venture Entity	Overland Contracting, Inc. (OCI)
Design-Build General Contractor	J.R. Filanc Construction Company, Inc. (Filanc)
Design-Build Engineer of Record	Black & Veatch Corporation (B&V)
City's Program Management	Carollo Engineers, Inc. (Carollo)
City's Construction Manager	Carollo – Mimiaga Engineering Group Inc.
Design-Build Contract Award	October 23 2018
Design Phase Notice to Proceed (NTP)	November 5, 2018
Original Anticipated Construction NTP	April 29, 2019
Original Substantial Completion Date	August 5, 2021
Original Final Completion Date	October 1, 2021
Actual Executed Construction NTP	March 20, 2020
Original Construction Phase Duration	886 Calendar Days (Constr. NTP to Final Completion)
Construction Phase Time Extensions Approved	374 Calendar Days (through Amendment No. 9)
Revised Construction Phase Duration	1088 Calendar Days (Constr. NTP to Final Completion)
Original / Current Substantial Completion	June 27, 2022 / February 6, 2023
Original / Current Final Completion Date	August 23, 2022 / August 31, 2023
Original Guaranteed Maximum Price (GMP)	\$67,234,512.00
Current Approved Amendments to Date	\$11,189,814.00 (through Amendment No. 9)
Current Approved GMP	\$78,424,326.00 (through Amendment No. 9)
Approved Progress Payments to Date	\$77,633,948.81 (thru 06/30/2023, Payments 1 – 59)
Percent Complete – Cost (Contractor Invoiced)	98.9% (\$77,633,949 / \$78,424,326.00)
Construction Calendar Days Elapsed	1381 Calendar Days (3/20/2020 to –12/31/2023)
Percent Complete - Time (Schedule Elapsed)	127% (1381 days / 1,088 days)
Percent Construction Complete (Overall)	113% (average of cost and time percent complete)

2.3 Project Scope of Work

- 0.85/0.97 million gallons per day (MGD) WRC Average Annual (AA).
- Influent Course Screens.
- Vortex Grit Removal Basins.
- Stormwater Auxiliary Filtration Equipment (SAFE) System (for high flow Equalization and Filtration).
- Fine Screens.
- Odor Control.
- Biological Nutrient Removal (BNR).
- Membrane Bioreactor (MBR).
- Sludge Holding Tank (SHT).
- Sludge Dewatering.
- Reverse Osmosis (RO) Filtration.
- Ultraviolet (UV)-Advanced Oxidation Process (AOP).
- Outfall Pump Station.
- Product Water Storage Tank.
- Indirect Potable Reuse (IPR) Pump Station.
- Operations Building.
- Maintenance Building.
- RO/UV-AOP Building.
- Electrical Building.
- City Vehicle Parking Canopy.
- Covered Outdoor Storage Aisles.
- Water/Collections Storage Shed.
- Water/Collections Equip. Canopy.
- Access Road and Site Improvements.
- Yard Piping and Site Work.
- Electrical Distribution Facilities.
- Emergency Standby Generator.
- Instrumentation and Controls.
- Utility Extensions into Site.

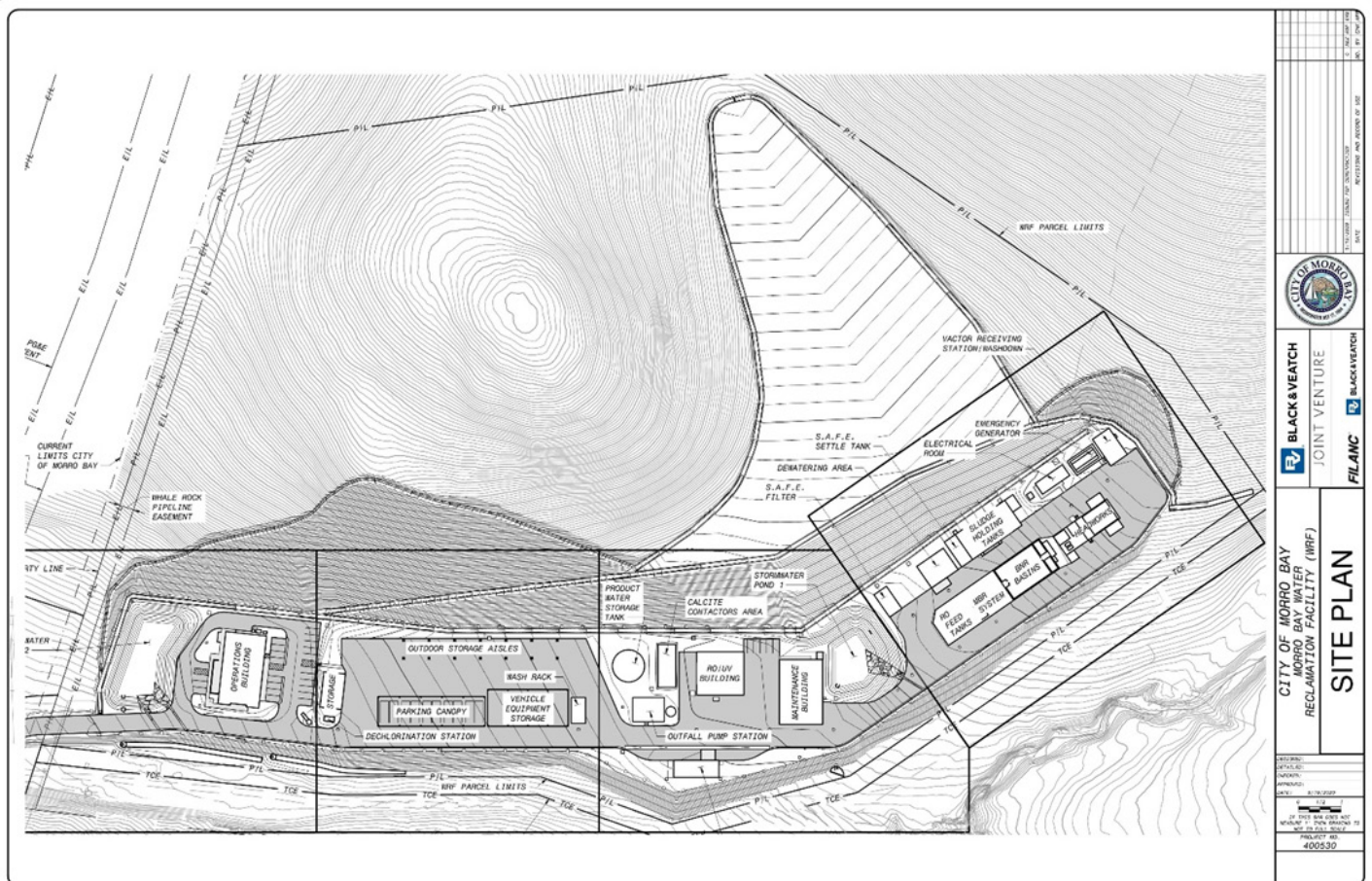


Figure 2 Morro Bay Water Reclamation Facility Site Plan

2.4 Construction Progress: April 1 to June 30, 2023

2.4.1 General and Administrative

- The City has completed the Time Schedule Order milestone requirement of full operation of wastewater treatment facilities in compliance with the State National Pollutant Discharge Elimination System (NPDES) permit and other regulatory requirements.
- Contractor has continued all non-disputed and disputed punch list and warranty items.
- Contractor/subcontractors continued to comply with Davis-Bacon Act requirements.
- Contract and the City continue to discuss the final contract close out negotiations and are expected to reach contract closeout in Q3.

2.4.2 Area –10 - Sitework

- Completed.

2.4.3 Area 20 - Headworks

- Completed.

2.4.4 Area 30 - BNR / MBR Treatment

- Completed.

2.4.5 Area 50 - RO / UV-AOP

- Completed.

2.4.6 Area 60 - Product Water Facilities

- Completed.

2.4.7 Area 70 - Residuals/Sludge Processing

- Completed.

2.4.8 Area 80 - Electrical and Controls

- Completed.

2.4.9 Area 90 - Chemical Storage and Feed

- Completed.

2.4.10 Area 95 - Operations Building

- Building is completed and occupied by City staff.

2.4.11 Area 96 - Maintenance Building

- Building is completed and occupied by City staff.

2.4.12 Areas 14, 15, 16, 17 - City Yard Facilities (Canopies, Shed, Storage, etc.)

- Buildings are completed and occupied by City staff.

2.5 Project Photographs

There are no construction photographs to include since the plant construction is complete and operational.

2.6 Change Order Summary

Table 2 WRC Guaranteed Maximum Price - Change Tracking Log

No.	Item	Approved Amount (\$)	Cal Days	Status
1	New Sodium Hypochlorite Feed for Plant Water	78,576	0	Amendment 1 Executed
2	Change Architecture of Operations Building	(21,623)	0	Amendment 1 Executed
4	Headworks Odor Control	18,422	0	Amendment 1 Executed
5	Remove Canopy and Monorail at MBR	(185,434)	0	Amendment 1 Executed
9	Consolidate Chemical Facilities	218,978	0	Amendment 1 Executed
10	Modify Chemical Piping	(15,856)	0	Amendment 1 Executed
15	Remove Solids Dumpster Lid	14,543	0	Amendment 1 Executed
16	Modify Outfall Pump Station	367,632	0	Amendment 3 Executed
17	Add SAFE Equalization Tank	504,116	0	Amendment 1 Executed
18	Instrumentation and Control Changes	75,266	0	Amendment 1 Executed
19	Reduce Size of the Product Water Tank	(129,681)	0	Amendment 3 Executed
21	Revise Maintenance Building Layout and Size	516,583	0	Amendment 1 Executed
22	Influent Piping and Metering	411,766	0	Amendment 1 Executed
23	Outdoor-Rated Blowers (BNR)	(58,210)	0	Amendment 1 Executed
24	Remove Bypass of Coarse Screens	(37,137)	0	Amendment 1 Executed
26	SAFE Diversion Box Additions	58,304	0	Amendment 1 Executed
28	Size Dewatering as a Building in the Future	30,983	0	Amendment 1 Executed
30	Match Blowers at SHT, BNR, and MBR System	17,426	0	Amendment 4 Executed
31	Coarse Screens and Grit Basins Stairs	52,870	0	Amendment 1 Executed
32	Sulfuric Acid System	315,652	0	Amendment 3 Executed
37	PLC/SCADA Software Uniformity	201,577	0	Amendment 3 Executed
38	IPR Product Water Tank Bypass	(26,087)	0	Amendment 1 Executed
39	NTP Delay	1,220,532	0	Amendment 3 Executed
40	Headworks Valve Automation	249,946	0	Amendment 3 Executed
41	Perimeter Barbed Wire Fence	79,935	8	Amendments 3&4 Executed
42	UV/AOP System Modifications	(33,481)	0	Amendment 3 Executed
44	Tank Access Improvements	210,327	0	Amendment 3 Executed
45	Maintenance Building Ceiling and Auto Roll-Up Door	21,009	0	Amendment 3 Executed
46	Curbed Washdown Areas	76,250	0	Amendment 3 Executed
47	Changes to Building Furnishings and Equipment	85,194	0	Amendment 3 Executed
50	Water/Sewer Supply Shed Revisions	13,142	0	Amendment 3 Executed
52	Analyzer Relocation and Enclosures	76,555	0	Amendment 3 Executed

No.	Item	Approved Amount (\$)	Cal Days	Status
55	Notice of Dispute - PG&E Temporary Power	13,163	0	Amendment 3 Executed
56	Impacts of Water Quality Changes	282,420	0	Amendment 3 Executed
57	Soil Lateral Earth Pressure	116,329	0	Amendment 3 Executed
58	Permanent Exclusion Fencing	855,991	0	Amendment 3 Executed
59	Increased Escalation Costs	1,232,677	0	Amendment 3 Executed
60	Weather Delay Impacts	0.00	0	Amendment 6 Negotiation
61	Potential Change Order (PCO) Design Impacts	158,172	0	Amendment 3 Executed
62	Conduit Alternative Design	(268,400)	0	Amendment 3 Executed
64	Reduce Performance Period	(35,450)	0	Amendment 3 Executed
65	Davis Bacon Wage Increases	63,937	0	Amendment 2 Executed
66	Caltrans Intersection Improvements	(21,893)	0	Amendment 3 Executed
67	BNR System Modifications	742,405	0	Amendment 3 Executed
68	SAFE Equalization Settle Tank Drain Piping	62,215	0	Amendment 3 Executed
69	Third Party Testing and Inspection	100,000	0	Amendment 3 Executed
71	CDFW Restrictions (Direct Costs & Inefficiencies)	254,443	0	Amendment 4 Executed
72	Owner Trailer Utility Hook Ups	19,593	0	Amendment 4 Executed
73	Main Gates in Perimeter Fence	27,031	0	Amendment 4 Executed
74	Parking Canopy Electrical Receptacles	42,346	0	Amendment 4 Executed
75	Security Windows at Admin Building	11,079	0	Amendment 4 Executed
76	Additional Sodium Bisulfite Pump	58,243	0	Amendment 4 Executed
77	COVID-19 Impacts	125,000	0	Amendment 6 Executed
78	Soil Slip Differing Site Conditions	280,013	0	Amendment 4 Executed
79	Water/Sewer Shed Revisions (Ref. PCO 50)	10,847	0	Amendment 4 Executed
82	PLC/SCADA Uniformity Complete (Ref. PCO 37)	108,887	0	Amendment 4 Executed
84	Alternate Red Legged Frog Barrier (Ref. PCO 58)	(468,768)	0	Amendment 5 Executed
86	Pothole Existing Water Valve in Teresa Road	5,189	0	Amendment 4 Executed
87	Modify Conduit Design Scope (Ref. PCO 62)	272,822	0	Amendment 5 Executed
88	Dead-Front Control Panels	37,774	0	Amendment 6 Executed
89	Add SCADA Managed IPR Off-Spec Diversion	0.00	0	Amendment 6 Negotiation
90	24Vdc Digital Output Circuits	25,689	0	Amendment 6 Executed
91	Equipment Color (Tnemec 32GR Light Gray)	12,500	0	Amendment 6 Executed

No.	Item	Approved Amount (\$)	Cal Days	Status
92	West Cut-Slope Soil Slip Reactivation (2021)	825,300	0	Amendment 6 Executed
93	NEMA 4X Electrical Enclosures	40,000	0	Amendment 6 Executed
94	Security System Revisions	25,659	0	Amendment 6 Executed
96	January 2021 Storm Event (1-26 thru 1-29)	40,195	7	Amendment 6 Executed
97	Hydroseeding Soil Amendment & Coverage	25,932	0	Amendment 8 Approved
98	Materials Testing & Inspection (3rd Party)	143,120	0	Amendment 7 Executed
100	Add Thin-Client Licenses and Work Station	17,229	0	Amendment 7 Executed
101	COVID-19 Related Material Cost Escalation	48,744	0	Amendment 7 Executed
102	City Requested SCADA Screen Revisions	60,000	0	Amendment 7 Executed
103	SRF Reimbursement Request Requirements	119,319	0	Amendment 8 Approved
105	WRF Monument Entry Sign Modifications	23,738	0	Amendment 7 Executed
106	Add Wash Rack Grease and Sand Interceptor	35,287	0	Amendment 8 Approved
107	Vactor Unloading Facility Revisions	38,880	0	Amendment 8 Approved
108	Defer SEED PLANT Milestone and Commission	750,000	187	Amendment 8 Approved
109	Procurement of Teletruck for City Staff	74,562	0	Amendment 7 Executed
110	Chem Facility Fencing Revisions	24,767	0	Amendment 7 Executed
113	Modify H2O SCADA Screen for RO System	13,264	0	Amendment 7 Executed
114	RO/UV Building Insulation (Disputed)	32,025	0	Amendment 7 Executed
117	Water Main Connection on Teresa Road	37,503	0	Amendment 7 Executed
118	Fine Screen LOTO Capability (Disputed)	26,905	0	Amendment 7 Executed
119	Credit for Chemicals Supplied by City	(141,972)	0	Amendment 7 Executed
120	Seed Sludge Maintenance Period	\$133,784	0	Amendment 9 Approved
121	Credit for Alternate Frog Barrier (Alum. Top Lip)	(12,000)	0	Amendment 8 Executed
125	Total Chlorine Analyzer at Dechlor Facility	46,146	0	Amendment 9 Approved
128	Granite Material Escalation	63,432	0	Amendment 9 Approved
132.2	Additional Paving at WRC Entrance	53,929	0	Amendment 9 Approved
133	Rancher Gate	2,825	0	Amendment 9 Approved
134	UV Sample Line and UVT Analyzer	37,345	0	Amendment 9 Approved
TOTAL		\$11,189,814	202	

Abbreviations:

PCO – potential change order; CDFW – California Department of Fish and Wildlife; PLC – programmable logic controller SCADA – supervisory control and data acquisition; SRF – State Revolving Fund; H₂O – water; LOTO – lockout tagout; Vdc – volts, direct current; NEMA – National Electrical Manufacturers Association; DDW – Division of Drinking Water

Table 3 WRC Change Order Summary and Current Status

Amendment No. (Status)	Amount (\$)
Amendment No. 1 (Executed)	1,636,060
Amendment No. 2 (Executed)	63,937
Amendment No. 3 (Executed)	5,992,218
Amendment No. 4 (Executed)	835,097
Amendment No. 5 (Executed)	(195,945)
Amendment No. 6 (Executed)	1,132,117
Amendment No. 7 (Executed)	359,885
Amendment No. 8 (Executed)	957,418
Amendment No. 9 (Approved)	\$409,028
Total (City Council Approved)	\$11,189,814

Section 3

CONVEYANCE FACILITIES

3.1 Construction Progress Report – Reporting Period: October 1 to December 31, 2023

This quarterly progress report summarizes the project construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

3.2 Project Summary

Table 4 Conveyance Facilities Project Summary

Item	Description
Public Agency Owner	City of Morro Bay
General Contractor	Anvil Builders Inc.
Design Engineer of Record	Waterworks Engineers, LLC.
City's Program Management	Carollo Engineers, Inc.
City's Construction Management	Carollo Engineers / Mimiaga Engineering Group Inc.
Advertisement for Bids Date	June 16, 2020
Prebid Conference Date	July 7, 2020
Number of Bidding Amendments Issued	5 Amendments (Issued between 6/18/20 and 8/5/20)
Bid Opening Date	August 12, 2020
Contract Award by City Council	November 10, 2020
Executed Construction NTP	December 14, 2020
Orig. Construction Phase Duration	390 Calendar Days (to Substantial Completion)
Orig. Construction and Closeout Duration	435 Calendar Days (to Final Acceptance)
Construction Phase Time Extensions Approved	282 Calendar Days (through Amendment No. 6)
Revised Construction Phase Durations	672 Days to Sub. Compl. - 717 Days to Final Accept.
Orig. Substantial Completion Date	January 8, 2022 (NTP+390 Cal. Days)
Current Substantial Completion Date	October 17, 2022 (NTP+672 Cal. Days)
Orig. Final Acceptance Date	February 22, 2022 (NTP+435 Cal. Days)
Current Final Acceptance Date	December 1, 2022 (NTP+717 Cal. Days)
Orig. Contract Amount	\$31,493,675.00
Current Approved Change Orders	\$4,890,931.00 (through Amendment No. 8)
Current Approved Contract Amount	\$36,384,606.00 (through Amendment No. 8)
Approved Progress Payments to Date	\$36,388,406 (thru 6/30/2023 – Pay Estimate #27)
Percent Complete – Cost (Contractor Invoiced)	100 % (\$36,388,406 / \$36,388,406)
Construction Calendar Days Elapsed	1112 Calendar Days (12/14/2020 to 12/31/2023)
Percent Complete - Time (Schedule Elapsed)	155% (1112 days / 717 days)
Percent Construction Complete (Overall)	127.5% +/- (average of cost & time percent completes)

3.3 Project Scope of Work

- New Sewer Pump Station A.
- New Sewer Pump Station B.
- Connection to Existing Lift Station 2.
- Connection to Existing Lift Station 3.
- Dual Sewer Force Main (< 3 miles).
- Brine (Outfall) Pipeline (< 3 miles).
- Indirect Potable Reuse Pipeline (> 2 miles).
- Fiber Optic Conduit & Cable (> 3 miles).
- 60-inch Microtunnel trenchless crossing (310-linear feet [LF]).
- 60-inch Auger Bore and Jack trenchless crossing (145-LF).
- Utility Pipe Bridge and Abutments (115-LF).
- Electrical Distribution Facilities.
- Emergency Standby Generators.
- Instrumentation and Controls.

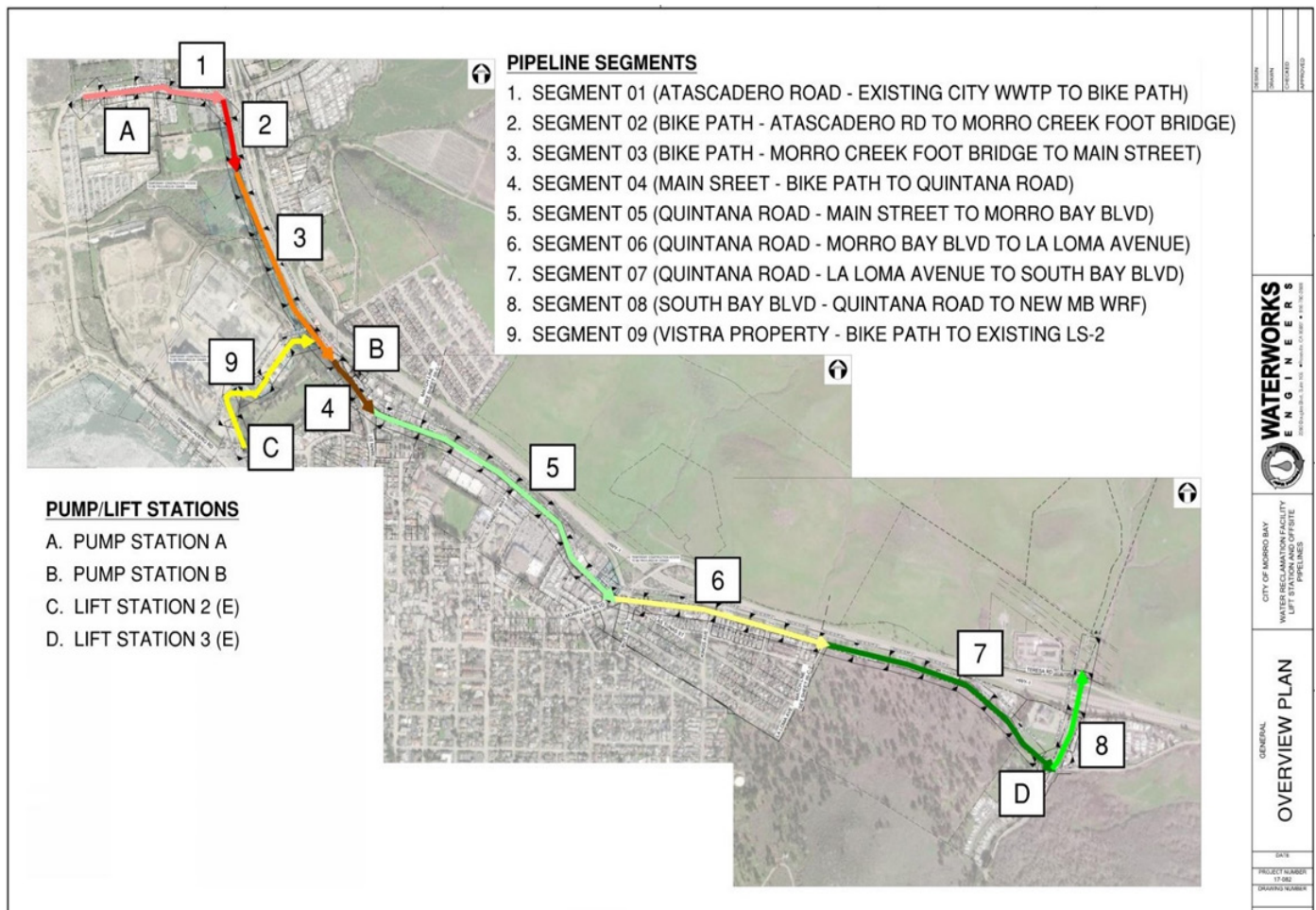


Figure 3 Morro Bay Conveyance Facilities Overview Plan

3.4 Construction Progress: July 1 to September 31, 2023

3.4.1 General and Administrative

- The City has completed the Time Schedule Order milestone requirement of full operation of the wastewater treatment facilities in compliance with the State NPDES permit and other regulatory requirements.
- Contractor and design engineer are currently working together to resolve the outfall pipeline capacity deficiency issue and are expected to present a resolution to the Program Team and City in Q3.

3.4.2 Segment 1 – Atascadero Road (Existing City Wastewater Treatment Plant to Bike Path)

- Pipelines and other facilities in this segment are completed and in service.

3.4.3 Segment 2 – Bike Path (Atascadero Road to Morro Creek Foot Bridge)

- Pipelines and other facilities in this segment are completed and in service.

3.4.4 Segment 3 – Bike Path (Morro Creek Foot Bridge to Main Street)

- Pipelines and other facilities in this segment are completed and in service.

3.4.5 Segment 4 – Main Street (Bike Path to Quintana Road)

- Pipelines and other facilities in this segment are completed and in service.

3.4.6 Segment 5 – Quintana Road (Main Street to Morro Bay Blvd)

- Pipelines and other facilities in this segment are completed and in service.

3.4.7 Segment 6 – Quintana Road (Morro Bay Blvd to La Loma Avenue)

- Pipelines and other facilities in this segment are completed and in service.

3.4.8 Segment 7 – Quintana Road (La Loma Avenue to South Bay Blvd)

- Pipelines and other facilities in this segment are completed and in service.

3.4.9 Segment 8 – South Bay Blvd (Quintana Road to New MB WRC)

- Pipelines and other facilities in this segment are completed and in service.

3.4.10 Segment 9 – Vistra Property (Bike Path to Existing Lift Station 2)

- Pipelines and other facilities in this segment are completed and in service.

3.4.11 New Pump Station A

- Pump Station facility is completed and in service.

3.4.12 New Pump Station B

- Pump Station facility is completed and in service.

3.4.13 Existing Lift Station 2

- Pump Station connection is completed and in service.

3.4.14 Existing Lift Station 3

- Connection to existing Lift Station 3 was completed.

3.5 Project Photographs

There are no construction photographs to include since the plant construction is complete and operational.

3.6 Change Order Summary

Table 5 Conveyance Facilities Pending Change Orders

No.	Item	Approved Amount (\$)	Calendar Days	Status
1	SHPO Work Suspension	443,000	40	Amendment 1 Executed
2	Add 2 Each 10-inch Valves & 10-inch Tee	23,498	0	Amendment 1 Executed
3	PS-B MAS-Relay Module per DC-01	13,477	0	Amendment 1 Executed
4	PS-A & PS-B Conduit Changes per DC-02	6,436	0	Amendment 1 Executed
5	Pump Station A Excavation NPDES Dewatering Permit	55,856	0	Amendment 7 Approved
6	Add Atascadero Gravity Sewer Pipeline			Withdrawn / Resolved
7	Water Relocation Conflict at Sta 71+00	131,096	0	Amendment 1 Executed
8.1	Additional Project Signage Costs	9,196	0	Amendment 3 Executed
8.2	Additional Project Signage Costs	3,856	0	Amendment 7 Approved
9.1	SoCal Gas Delays and Disruptions	43,017	0	Amendment 2 Executed
9.2	SoCal Gas Delays and Disruptions	20,750	0	Amendment 3 Executed
10	Reroute Joint Trench for DDW Clearance			Withdrawn / Resolved
11	Reroute IPR & Water at Sta. 144 Culvert	103,893		Amendment 4 Executed
12	CA-SLO-2232H Work Interruptions	56,978	0	Amendment 1 Executed
13	Utility Bridge Abutment Changes	500,000	60	Amendment 5 Executed
13.1	CA-SLO-16 Work Revisions	0.00	153	Amendment 3 Executed
14	Notice of Microtunneling Obstructions			Withdrawn / Resolved
15	Fiber Optic Conduit at Sta 88 Not Found			Withdrawn / Resolved
16	Reroute Joint Trench at State Water Line	144,616	0	Amendment 3 Executed
17	Add Tracer Wire to IPR Lines	108,521	0	Amendment 5 Executed
18	Add and Delete Pipe Joint Fittings			Withdrawn / Resolved
19	Remove City's Existing Desal Media Tank	54,189		Amendment 4 Executed
20	Pothole Utilities for Pilot Well Layout	15,291	0	Amendment 3 Executed
21	Assist City with Sewer Line Repair			Withdrawn / Resolved
22	6-Inch Waterline Relocation at PS-A	20,147	0	Amendment 2 Executed
23.1	Misc. Unforeseen Utility Work – Part 1	27,198	0	Amendment 2 Executed
23.2	Misc. Unforeseen Utility Work – Part 1	17,949	0	Amendment 7 Approved
24	PS-A and PS-B Generators Storage Cost			Withdrawn / Resolved
25	Material Cost Escalation – Part 1	292,000	0	Amendment 5 Executed
26	Relocate 12-inch RO Waterline at Sta 87+00	130,452	6	Amendment 6 Approved
27	Undisputed MTBM Delays & Disruptions	111,161	0	Amendment 2 Executed

No.	Item	Approved Amount (\$)	Calendar Days	Status
28	SLO APCD Generator Mandates	301,703	0	Amendment 2 Executed
28.1	SLO APCD Generator Mandates (Rescind)	(301,703)	0	Amendment 4 Executed
29	Alternate TCP at Kings and Las Tunas			Withdrawn / Resolved
30.1	Bike Path Joint Trench and Waterline Re-Design	5,635	0	Amendment 8 Executed
31	Existing SD Collapse at Sta 63+97	7,389	2	Amendment 6 Executed
32	Broken Waterline at Quintana & Kings	6,198	0	Amendment 3 Executed
33	Drainage Revisions Near Todd's Garage	6,895		Amendment 4 Executed
33.1.1	Paving Limit Revisions	537,118	0	Amendment 8 Executed
34	Bike Path Jack & Bore Obstruction	84,276	0	Amendment 2 Executed
35	RO Brine Line Discharge to WRF Outfall	200,000	12	Amendment 6 Executed
36	DDW Initiated Realignment Sta 99 - 116	82,892	2	Amendment 6 Executed
37	Restoration of Quintana due to Weather	13,000	0	Amendment 6 Executed
38	Cultural Monitor "No Shows"			Withdrawn / Resolved
39	Cultural Extra Work at MTBM Launch Pit	45,266	0	Amendment 3 Executed
40	Weather Days (non-compensable)			Tracking rain days in excess of 20
41	Unknown Cement Subgrade at S. Bay	26,600	0	Amendment 4 Executed
42	Unknown Conduits at S. Bay & Quintana	7,788	0	Amendment 4 Executed
43	City Back-Charge Expenses			Withdrawn / Resolved
44	LS-2 Alignment ESA Fence Installation			Withdrawn / Resolved
45	Atascadero BR Realignment	34,023	0	Amendment 6 Approved
46	Unknown Utilities at South Bay & Caltrans			Withdrawn / Resolved
47	Utility Bridge Casing/Piping Issues	99,587		\$99K Submitted / City Rejected
48	Bedrock Below Paving at Teresa Rd			Withdrawn / Resolved
49	LS-2 Alignment Revisions	48,273		Amendment 4 Executed
50	Relocate Water & Sewer on Teresa Rd	210,000	0	Amendment 5 Executed
51	Add Backflow Devices at RO Discharge			Withdrawn / Resolved
52	High Level Switch Alarm at Utility Bridge	8,743	0	Amendment 5 Executed
52.2	High Level Switch Alarm at Utility Bridge	28,627	0	Amendment 8 Executed
53	PS-B Grading and Drainage Revisions	65,102	5	Amendment 6 Executed
54	Extend Spare FO Conduits to Grade			Withdrawn / Resolved
55	HDPE for City Emergency Leak Response	1,338	0	Amendment 6 Executed
56	Fiber Optic Design Revisions and Upgrades	134,605	0	Amendment 8 Resolved
57	FCA Restraint Rods and Lugs at PS	47,647	0	Amendment 6 Executed
58	Wet Well Piping Fit-up Bolts to 316SS	9,963	0	Amendment 6 Executed
59	PS-A Retaining Wall Revision	20,837	0	Amendment 6 Executed

No.	Item	Approved Amount (\$)	Calendar Days	Status
61	City Sale Tax Increase	134,403	0	Amendment 5 Executed
63	Wet Well Pump Concrete Pedestal			Withdrawn / Resolved
64	Existing LS 3 Connection and Utility Conflicts	71,000	0	Amendment 8 Executed
65	Relocate New Diversion MH and replace exist MH	296,404	0	Amendment 8 Executed
66	Repair Leaking City Waterline at North Abutment	10,958	0	Amendment 7 Executed
67	Waterline Replacement Conflicts near Mortuary	86,171	0	Amendment 8 Executed
68	Waterline Breaks on Atascadero Rd	34,120	2	Amendment 6 Executed
69	Tie-in HDPE Lines at WRC	18,705	0	Amendment 8 Executed
70	Install Existing WWTP Temp Flush Line			Withdrawn / Resolved
71	Reroute Sewage back to the Old Plant on 10/11	59,642	0	Amendment 8 Executed
73	Guide Rail Modifications at Wet Wells	32,756		Amendment 8 Executed
75	Additional Bollards required by PG&E at Pump Stations	15,013	0	Amendment 7 Executed
78	Change in 1-inch AIR-DR piping to Stainless Steels (DC#35)	16,839	0	Amendment 7 Executed
80	Repair existing leaking RO line at PS-A (Pre-Existing Leak)	4,499	0	Amendment 7 Executed
82.2	Additional Flatwork Concrete	62,920	0	Amendment 8 Executed
83	Existing Waterline Replacement at PSA	117,664	0	Amendment 8 Executed
84	Disputed Caltrans R/W Restoration Costs	10,885	0	Amendment 8 Executed
86	Transport FPVC Pipe to WRC Site	1,770	0	Amendment 8 Executed
89.1	Fencing Modifications	33,980	0	Amendment 8 Executed
90	PSA & PSB VFD Auto-Reset due to Voltage Drops	12,3920	0	Amendment 8 Executed
94	Standby Excavator at Morro Creek for Rain Event	8,402	0	Amendment 8 Executed
96	Raise FO Box at FBV Paving Error	5,089	0	Amendment 8 Executed
98	Credit for Deleting 36-inch storm drain	(207,000)	0	Amendment 8 Executed
Total		\$4,890,931	282	Through Amendment No. 8

Abbreviations:

SHPO – State Historical Preservation Officer; PS – pump station; CA-SLO – California-San Luis Obispo; Misc. – miscellaneous; MH – manhole; BR – brine; MTBM – Microtunnel Boring Machine; APCD – Air Pollution Control District; TCP – Traffic Control Plan SD – storm drain; LS – lift station; FO – fiber optic; HDPE – high-density polyethylene; CMU – concrete masonry unit; R/W – right-of-way.

Table 6 Conveyance Facilities Executed Change Orders

Change Order No. (Status)	Amount (\$)
Amendment No. 1 (Executed)	674,485
Amendment No. 2 (Executed)	587,502
Amendment No. 3 (Executed)	241,317
Amendment No. 4 (Executed)	(54,065)
Amendment No. 5 (Executed)	1,253,667
Amendment No. 6 (Executed)	646,763
Amendment No. 7 (Executed)	\$124,970
Amendment No. 8 (Executed)	\$1,416,292
Total (City Council Approved)	\$4,890,931

Section 4

RECYCLED WATER FACILITIES PROJECT

4.1 Pre-Construction Progress Report – Reporting Period: October 1 to December 31, 2023

This quarterly progress report summarizes the project planning and construction and addresses contract time, change orders, progress, key construction accomplishments, safety and security issues, construction activities, environmental and cultural monitoring, and Davis-Bacon labor compliance issues.

4.2 Pre-Construction Project Summary

Table 7 Recycled Water Facilities Project Summary

Item	Description
Public Agency Owner	City of Morro Bay
General Contractor	Not known
Pre-Design Hydrogeological Consultant	GSI Water Solution, Inc. (GSI)
Design Engineer of Record	TBD
City's Program Management	Confluence Engineering Solutions
City's Construction Management	TBD
Design Percent Complete	10%
Pilot Injection Well Construction Bid Date	March 22, 2022
Pilot Injection Well Construction Contract Amount	\$356,625
Pilot Injection Well Construction Final Contract Amount	\$356,585
Pilot Injection Well Construction Completion Date	January 3, 2023
Advertisement for Bids Date	Estimated March 2025
Prebid Conference Date	Estimated April 2025
Number of Amendments Issued	3
Bid Opening Date	Estimated April 2025
Engineer's Estimate of Cost	Estimated February 2025
Executed Construction NTP	Estimated May 2025
Original Substantial Completion Date	November 1, 2023
Original Final Completion Date	NA
Original Construction Phase Duration	14 months, June 2025 – August 2026
Construction Phase Time Extensions	TBD
Revised Construction Phase Duration	TBD
Current Substantial Completion Date	July 2026
Current Final Completion Date	TBD
Original Contract Amount	\$4,400,000

Item	Description
Current Executed Change Orders	-\$40
Current Contract Amount	\$6,395,524
Approved Progress Payment to Date	\$366,975
Percent Complete – Cost (Contractor Invoiced)	5.7%
Construction Calendar Days Elapsed	0 Calendar Days
Percent Complete - Time (Schedule Elapsed)	0%
Percent Construction Complete (Overall)	5.7%

4.3 Planned Project Scope of Work

- Offsite recycled potable reuse facilities including pipelines, injection wells, monitoring well, etc.
- Implementation of groundwater augmentation in the Morro Groundwater Basin.

4.4 Pre-Construction Progress: October 1 to December 31, 2023

- Carollo Engineers continued preparation of the Report of Wastewater Discharge (ROWD) Application and Engineers Report for the IPR Program.
- City Staff and the Recycled Water Program Team participated in a meeting with the Division of Drinking Water to review the results of the UV/AOP Challenge Test.
- City Staff and the Recycled Water Program Team participated in a tour of the Orange County Water District's Groundwater Replenishment System treatment facility and injection wellfield.
- City Staff and the Recycled Water Program Team coordinated with the project archeologist and biologist to develop recommendations for modifying the Area of Potential Effect for the WRF Program.
- City Staff and the Recycled Water Program Team prepared RFPs for the procurement of engineering and hydrogeologic design services for the injection wells and recycled water pipelines.
- City Staff and the Recycled Water Program Team coordinated with the WRF Program Funding/Financing Agencies regarding the Recycled Water Program schedule and other requirements.
- On October 18, 2023, the Phase 1 Recycled Water Program Implementation Strategy and the Recycled Water Program Implementation Consultant Contracts were presented to the Public Works Advisory Board (PWAB).
- On November 14th, 2024, the Phase 1 Recycled Water Program Implementation Strategy and the Recycled Water Program Implementation Consultant Contracts was presented to a Joint City Council and PWAB Meeting. The City Council approved moving forward with the implementation of Phase 1 of the Recycled Water Program and approval of the Recycled Water Program Implementation Consultant Contracts, conditional on drafting a letter to the Clean Water State Revolving Fund (CWSRF) representatives requesting formal documentation of the minimum recycled water program implementation requirements.
- City Staff and the WRF Subcommittee developed and submitted the letter requesting formal documentation of the minimum recycled water program implementation requirements to the CWSRF representatives.

4.5 Project Photographs

There were no construction progress or project photographs taken during this reporting period.

4.6 Change Order Summary

- N/A (main project work has not commenced).

4.7 Problems Encountered / Solutions / Status

- N/A (main project work has not commenced).

Section 5

ENVIRONMENTAL/REGULATORY COMPLIANCE

This quarterly progress report section summarizes the City's environmental and regulatory compliance pursuant to oversight by the following regulatory agencies: State Water Resources Control Board (SWRCB), California Department of Fish and Wildlife (CDFW), United States Fish and Wildlife Service (USFWS), United States Environmental Protection Agency (USEPA), California Coastal Commission, SLO County Air Pollution Control District (APCD), SHPO, Central Coast RWQCB, and the City of Morro Bay. Specific activities are summarized in Appendix A. Copies of supporting compliance documentation is available upon request.

Appendix A

ENVIRONMENTAL / REGULATORY COMPLIANCE SUMMARY



WATER RECLAMATION FACILITY ENVIRONMENTAL/REGULATORY COMPLIANCE SUMMARY

UPDATED: December 31, 2023



Agency	Reference Document	Document Reference	Measure Focus	Measure	Phase 1 Water Reclamation Facility (WRF) Compliance Activities (10/1/2023 through 12/31/2023)	Phase 2 Conveyance Facilities Compliance Activities (10/1/2023 through 12/31/2023)	Phase 3 Recycled Water Facilities Compliance Activities (10/1/2023 through 12/31/2023)
NOTE THAT BOTH WRF AND CONVEYANCE PROJECTS ARE COMMISSIONED AND THE CITY'S ISSUANCE OF SUBSTANTIAL COMPLETION DOCUMENTS IS PENDING. AS SUCH IT IS ANTICIPATED THAT MANY OF THE BELOW STIPULATIONS AND CONSTRUCTION DURATION REQUIREMENTS WILL BE RESOLVED IN THE NEXT QUARTERLY REPORT UPDATE.							
United States Fish and Wildlife Service	Biological Opinion	Biological Opinion	Tidewater Goby Item 1	The applicant will implement erosion and sedimentation control measures (e.g., silt fences, straw bales or wattles) in all areas where disturbed substrate may potentially wash into waters via rainfall or runoff, particularly around stockpiled material and at the downstream end of each project reach. Such measures should remain in place and be inspected periodically until the project is complete and exposed soils are stabilized. Diversion structures, sediment traps/basins and associated equipment (e.g., pumps, lines) will be maintained in optimal working condition for the entire duration of the preparation and construction periods.	No change in status. Project Biologist (KMA) has clarified that the Tidewater Goby requirement is only applicable to work near Morro Creek. Not applicable to the WRF project. See Submittal #007 (Revisions 0 thru 3): Stormwater Pollution Prevention Plan. SWPPP BMP measures are installed and being maintained throughout the site perimeter and laydown area. (MEASURE ACHIEVED)	Project Biologist (KMA) has clarified that the Tidewater Goby requirement is only applicable to work near Morro Creek (i.e. Utility Bridge and abutment structures). Work on the Utility Bridge abutments has commenced and applicable SWPPP measures are installed. No work within the creek channel or banks has or will occur. These areas are delineated to restrict worker access. There has been no rain or visible water in the creek during the reporting period. The work is regularly monitored by the Project Biologist.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 2	Prior to the start of work, the contractor will prepare a spill prevention plan to ensure prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All project-related hazardous materials spills within the project site will be cleaned up immediately. Spill prevention and cleanup materials will be on-site at all times during the course of the project.	No change in status. No construction related spills recorded during the reporting period. (MEASURE ACHIEVED) See Submittal #076: Spill Prevention, Control and Countermeasures (SPCC) Plan. Spill prevention kits and other associated supplies are being maintained on site. (MEASURE ACHIEVED)	Project Biologist (KMA) has clarified that the Tidewater Goby requirement is only applicable to work near Morro Creek (i.e. Utility Bridge and abutment structures). Work on the Utility Bridge abutments has commenced and applicable SWPPP Spill Containment measures are being implemented. The creek area is delineated to restrict worker access. There has been no rain or visible water in the creek during the reporting period. The work is regularly monitored by the Project Biologist.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 3	All refueling, maintenance, and washing of equipment and vehicles will occur on paved areas in a location where a spill would not travel into a drainage feature or storm drain inlet. This fueling/staging area will conform to Best Management Practices applicable to attaining zero discharge of stormwater runoff into waters of the U.S. and State of California. At a minimum, all equipment and vehicles must be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills. Washing of equipment will occur only in a location where polluted water and materials can be contained for subsequent removal from the site.	No change in status. General compliance with measure is confirmed. (MEASURE ACHIEVED) The paved fueling and maintenance area has been removed as part of project demobilization. (MEASURE ACHIEVED)	Project Biologist (KMA) has clarified that the Tidewater Goby requirement is only applicable to Morro Creek area. Work on the Utility Bridge abutments has commenced and applicable SWPPP Spill Containment measures are being implemented. No vehicle or equipment fueling, maintenance, or washing activities occurred at or near the subject sensitive area.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 4	A designated concrete washout location will be established onsite, in an area at least 50 feet from any drainage feature or storm drain inlet. The washout will be maintained and inspected weekly, and will be covered prior to and during any rain event. If a container is used, concrete debris will be removed whenever the washout container reaches the half full mark.	Structural concrete work is completed. Filanc provides fully compliant washout areas for each concrete placement event. All temporary washout areas have been removed as part of project demobilization. (MEASURE ACHIEVED) Filanc's SWPPP includes Section 2.6, Section 3.3, and BMP WM-8, with stipulations for Concrete Waste Management. (MEASURE ACHIEVED)	Project Biologist (KMA) has clarified that the Tidewater Goby requirement is only applicable to Morro Creek area. Work on the Utility Bridge abutments has commenced and applicable SWPPP Spill Containment measures are being implemented. No concrete washout activities have occurred at or near the subject sensitive area.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 5	Best Management Practices for dust abatement will be a component of the project's construction documents. Dust control requirements will be carefully implemented to prevent water used for dust abatement from transporting pollutants to storm drains leading to the creek channel.	No change in status. Dust control by watering of work areas is implemented on an on-going as needed basis. The Contractor has been instructed by the City to use water from an existing City well due to drought water-use restrictions. Design-Build Agreement Section 5.10.1 includes stipulations for the Fugitive Dust Control Plan (FDCP) in accordance with the SLOC APCD Regulations. The approved SWPPP includes applicable dust control measures. (MEASURE ACHIEVED)	Project Biologist (KMA) has clarified that the Tidewater Goby requirement is only applicable to Morro Creek area. Work on the Utility Bridge abutments has commenced and applicable dust control measures are being implemented. Dust control activities have occurred whenever necessary.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Tidewater Goby Item 6	The applicant will prepare a frac-out contingency plan prior to initiation of construction activities that involve horizontal direction drilling activities. The applicant will implement the frac-out contingency plan during horizontal directional drilling construction activities. At a minimum, the plan will include the following: (a) Measures to minimize the potential for a frac-out associated with horizontal directional drilling activities; (b) Provide for the timely detection of frac-outs; (c) Protect areas that are considered environmentally sensitive (streams, wetlands, other biological resources, cultural resources); (d) Ensure an organized, timely, and "minimum-impact" response in the event a frac-out and the release of drilling mud occurs; and (e) Ensure that all appropriate notifications are made to the appropriate environmental specialists immediately (e.g., qualified biological monitor), and to appropriate regulatory agencies within 24 hours and that documentation is completed.	No change in status. There is no horizontal directional drilling (HDD) on the project. As such, no frac-out plan is required. (MEASURE NOT APPLICABLE)	No change in status. As stated above, the Tidewater Goby requirement is only applicable to work near Morro Creek. Work on the Utility Bridge abutments has been completed.. However, no horizontal directional drilling (HDD) is required near Morro Creek. As such, no frac-out plan is required. (MEASURE NOT APPLICABLE)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Morro Shoulderband Snail Item 1	A Service-approved biologist will survey for Morro Bay Shoulderband snails no more than 48 hours before initial ground-disturbing and vegetation-clearing activities that occur on dune land or Baywood fine sand. The Service-approved biologist will monitor all construction activities occurring on dune land or Baywood fine sand. If the species is located during any of these pre-activity surveys or during subsequent project activities, the Service will be contacted immediately and activities will halt in that particular area until it is determined what actions may be necessary to avoid take of the snail.	NA -Not applicable to WRF Project. The Morro Bay Shoulderband Snail are not present at the WRF Site.	No change in status. There was no activity in dune sands or Baywood fine sand during the reporting period. KMA has performed all necessary pre-construction inspections and on-going monitoring. To date only orange construction fencing has been necessary for area delineation, not silt fencing. KMA will also continue to perform all required post rain or dense fog inspections as required.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Morro Shoulderband Snail Item 2	Any equipment use, materials stockpiling, lift station construction, or any other uses proposed on the north side of Atascadero Road opposite the existing treatment plant will be setback from any potentially suitable habitat. If construction adjacent to potentially suitable Morro Shoulderband snail habitat occurs during the winter rain season, a Service-approved biologist will survey the work area immediately following rain events or dense fog conditions to ensure that no Morro Shoulderband snails have entered the site.	NA -Not applicable to WRF Project. The Morro Bay Shoulderband Snail are not present at the WRF Site.	No change in status. Contractor has removed staging materials and equipment on the north side of Atascadero Road across from the City's existing wastewater plant. All equipment, materials, and other staging area amenities on the north side of Atascadero Road are setback from any potentially suitable habitat. The set back has been reviewed and is being monitored by the project Service-Approved Biologist. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Informal Consultation	Morro Shoulderband Snail Item 3	Silt fence will not be used to exclude Morro Shoulderband snails from work areas where suitable sandy soils and habitat may be present. Work areas in sandy soils near potential Morro Shoulderband snail habitat will be clearly delineated with flagging and/or stakes to limit the boundaries of work areas and confine them to developed and paved areas. If silt fencing must be used for other reasons in areas near potential Morro Shoulderband snail habitat, additional measured developed by a Service-approved biologist will be implemented to avoid harm to the Morro Shoulderband snail.	NA -Not applicable to WRF Project. The Morro Bay Shoulderband Snail are not present at the WRF Site.	No change in status. Applicable sandy soil habitat has been noted in areas adjacent to work zones. Off-set distances have been reviewed and deemed suitable by the Service-Approved Biologist (KMA). KMA has performed all necessary pre-construction inspections and on-going monitoring. To date only orange construction fencing has been necessary for area delineation, not silt fencing.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 6	The permanent fencing will include a concrete exclusion barrier along the eastern boundary of the site that extends 24 inches above grade. The top of the concrete exclusion barrier will include a six-inch lip that will serve as a climbing barrier for the California red-legged frog (CRLF). Affixed to the top of the concrete exclusion barrier will be a six-foot chain link fence with privacy slats. The remaining perimeter of the site will include a six-foot chain link fence with privacy slats.	See Biological Opinion Amendment below. City proposed and USEPA/USFWS accepted an alternate HDPE wildlife barrier (i.e. 2 mm thick HDPE, 24" above grade, 36" below grade, 4" FRP top lip, affixed to 6 ft chain link fence with slats). The barrier design includes 1660 LF of HDPE barrier and 490 LF of concrete wall barrier. The DB Team has completed installing CRLF barriers during the report period.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.



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United States Fish and Wildlife Service	Biological Opinion	Biological Opinion Amendment	California Red Legged Frog Biological Opinion Amendment dated 1/6/2021	The proposed changes include using a high density polyethylene (HDPE) exclusion barrier along the facility's eastern edge as it interfaces with the Drainage 3 corridor, in place of the concrete barrier described in the biological opinion. The concrete barrier would still be used in the southeastern part of the site along the access road. The HDPE exclusion barrier would be installed 36 inches below grade and extend 24 inches above grade. It has a 15 to 30 year life expectancy, compared to the 50 to 100 year life expectancy of the concrete barrier. The HDPE barrier would have a 4-inch overhanging lip at the top of the fence to deter climbing California red-legged frogs, while the concrete barrier would have a 6-inch lip. The City of Morro Bay (applicant) will conduct quarterly inspections of the barrier for signs of wear or damage and provide immediate repairs as needed. The applicant expects that only the above-ground portion of the barrier will need to be replaced in the future, because the below-ground barrier will be protected from sunlight, weather, and other potential damage. In the event that a complete barrier replacement is required, the applicant will contact the U.S. Fish and Wildlife Service (Service) for guidance prior to completing replacement. The applicant will document instructions to contact the Service in the event of a complete barrier replacement in their written protocols for fence maintenance.	The DB Team completed the 490 LF concrete barrier during the reporting period. The DB Team also completed installation of the 1660 LF of the alternate HDPE wildlife barrier (i.e. 2 mm thick HDPE, 24" above grade, 36" below grade, 4" FRP top lip, affixed to 6 ft chain link fence with slats). Both barriers remain incomplete as of the end of the reporting period.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Biological Opinion Amendment	California Red Legged Frog Biological Opinion Amendment (issue dated pending)	This second amendment covers the additional surface disturbance to grassland areas associated with the west cut-slope landslide and subsequent remediation. The coordination and correspondence between the City and USEPA/USFWS documents the extent of area disturbed by the landslide, field investigations and repair design, major earthwork remediation activities, and grasslands restoration.	Contractor has completed all earthwork associated with the landslide remediation and has hydroseeded the area. Grassland re-growth is progressing. The Service-Approved Biologist (KMA) has confirmed that no wetland habitat, riparian habitat, or drainage feature was impacted from the eroded soils or repair work. The repair area will be restored to its natural condition in accordance with the BO to preserve suitable upland movement habitat for the California red-legged frog.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 6	Permanent night lighting will be minimal with low intensity and will follow current City of Morro Bay and County of San Luis Obispo policies to prevent spillover into open space areas.	No change in status. Low intensity night lighting design elements are included in the Design-Build Team's "Issued For Construction" Plans/Specifications. (MEASURE ACHIEVED)	No change in status. Low intensity night lighting design elements are included in the Conveyance Facility Plans/Specifications. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 7	The applicant proposes to mitigate for the loss of California red-legged frog critical habitat through the on-site conservation of 19.5 acres of dispersal habitat, on the same parcel where the Water Reclamation Facility would be located. The applicant will achieve protection through a conservation easement or another appropriate and feasible mechanism. The applicant will develop the protection in coordination with the Service and complete protection within 12 months of initiating project activities. The construction process will disturb nine acres of the proposed mitigation area by grading and installing fourteen drainage swales. The drainage swales would be concrete-lined with sides at a 1:1 slope. The applicant will revegetate the disturbed areas and return them to grassland.	In 2021, the City provided USEPA draft Conservation Covenant language for review in advance of the City Council taking action to establish the 19.5-Acre Dispersal Habitat Conservation Easement. On September 28, 2021, the Morro Bay City Council voted to approved the Conservation Covenant. Upon final completion of WRF Construction, the City will then finalize the conservation covenant	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog DESCRIPTION OF THE PROPOSED ACTION Biological Opinion p. 7	The applicant's Coastal Development Permit, issued by the Coastal Commission of California, obligates the applicant to restore and enhance 1.5 acres of riparian zone. These acres are located between the Water Reclamation Facility's eastern fence line and the property boundary parallel to Drainage 3. The applicant will plant native trees, shrubs, and grasses to enhance the riparian area. A restoration ecologist will monitor the riparian restoration zone for five years or until restored areas have met success criteria. The proposed riparian restoration zone connects with the proposed compensatory mitigation acres at the north end of the facility.	The City submitted its Riparian Enhancement Plan (REP) to the Coastal Commission and CDFW. CDFW has not responded to the City's request for review. The City has received authorization to proceed from the Coastal Commission without CDFW comments. The City has added the REP scope to the DB contractor's scope of work and the work will start in the next reporting period.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 1	Only Service-approved biologists will participate in activities associated with the capture, handling, and relocation of California red-legged frogs.	No change in status. The project Biologist, Kevin Merk (KMA) has been approved in writing by USFWS. (MEASURE ACHIEVED)	No change in status. The project Biologist, Kevin Merk (KMA) has been approved in writing by USFWS. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 2	The applicant will submit the names and resumes of a qualified biologist and qualified biological monitor for approval by the Service at least 14 days prior to the start of work. Ground disturbance will not begin until written approval is received from the Service that project biologist(s) are qualified to conduct the work.	No change in status. The project Biologist, Kevin Merk (KMA), and other project monitors employed by KMA, have been approved in writing by USFWS. (MEASURE ACHIEVED)	No change in status. The project Biologist, Kevin Merk (KMA), and other project monitors employed by KMA, have been approved in writing by USFWS. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 3	A Service-approved biologist will survey the project site no more than 48 hours before the onset of work activities. The Service-approved biologist will survey a 500-foot buffer zone upstream and downstream of the construction area for California red-legged frogs, as feasible, in consideration of the private property in the area. The Pre-Construction Survey will include a description of any standing or flowing water present in the drainage feature in proximity to the WRF construction area. If any life stage of the California red-legged frog is found and these individuals are likely to be killed or injured by work activities, the approved biologist will be allowed sufficient time to move them from the site before work begins. The Service-approved biologist will relocate the California red-legged frogs the shortest distance possible to a location that contains suitable habitat and that will not be affected by activities associated with the project. The relocation site will be in the same drainage to the extent practicable. The Service-approved biologist will coordinate with the Service on the relocation site prior to the capture of any California red-legged frogs.	No change in status. The Service-Approved Biologist conducted the required Pre-Construction Survey and provided the City documentation of results. There were no California red-legged frog relocations necessary during the Pre-Construction Survey. (MEASURE ACHIEVED)	No change in status. The Service-Approved Biologist continues to conduct all required Pre-Construction Surveys as pipeline installation activities advance along the project alignment. KMA documents such surveys as required. There were no California red-legged frog relocations necessary during the Pre-Construction Survey. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 4	A Service-approved biologist will be present at the work site until all California red-legged frogs have been relocated out of harm's way, workers have been instructed, and disturbance of habitat has been completed. After this time, the Service-approved biological monitor will ensure and document on-site compliance with all minimization measures. Biological monitoring will occur for all initial disturbance activities, and then will be scaled back to an as-needed basis once all habitat was removed for any activity occurring near a drainage feature or other environmentally sensitive habitat area. Biological monitoring will occur on a daily basis during the rainy season for any construction related activities at the WRF site. The Service-approved biologist will ensure that this monitor receives training on the minimization measures. If the Service-approved biological monitor or the Service-approved biologist recommends that work be stopped because California red-legged frogs would be affected in a manner not anticipated by the EPA and the Service during review of the proposed action, they will notify the project manager (the manager that is directly overseeing and in command of construction activities) immediately. The project manager will either resolve the situation by eliminating the adverse effect immediately or require that all actions causing these effects be halted. At this time, the Service-approved biologist may be called to relocate the California red-legged frog(s) out of harm's way.	No change in status. The Service-Approved Biologist provided all required field monitoring and oversight as stipulated in the measure during initial ground disturbance activities, during the monitoring scale back phase, and through the remainder of the reporting period on an as-needed basis. The biologist continues to document compliance with this measure in Biologist field notes. (MEASURE ACHIEVED).	No change in status. There were no California red-legged frog relocations necessary during the Pre-Construction Survey or during the reporting period. The Service-approved biologist has provided all required field monitoring and oversight as stipulated in the measure. The biologist has and continues to document compliance with this measure in Biologist field notes. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 5	Before the start of any construction activities at the Water Reclamation Facility, the applicant will erect a combination silt, safety, and wildlife exclusion fence around the entire site. The entire site will include all disturbed areas and areas utilized by the applicant and its contractors for temporary construction laydown and stockpiling. The fence will have a minimum height of at least six inches, and a minimum five-inch overhang that will serve as a climbing barrier for California red-legged frogs. To allow for site access, a temporary chain link fence gate will be erected at the head of the access road at Teresa Road. The exclusion fencing material will be affixed to the chain link fence gate and will be equipped with ground sweeps. The temporary construction fence will be monitored on a daily basis during the winter rain season (October 15 through April 15) and will remain in place until after substantial completion of the Water Reclamation Facility following the completion of the permanent exclusion fencing system.	No change in status. A temporary combination silt, safety, and wildlife exclusion fence was installed around the entire site prior to the start of field work. The perimeter barriers continue to be monitored and maintained by FBV. The barriers are also inspected by the Service-Approved Biologist on an on-going basis. Compliance with this measure is denoted in Biologist field notes. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.



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United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 6	Prior to the commencement of construction-related activities, and for the duration of proposed construction activities, all construction workers will attend an Environmental Awareness Training and Education Program, developed and presented by the Service-approved biologist. The program will include information such as identification, habitat description, and protection under the Federal Endangered Species Act. The training will include detailed information about California red-legged frog and its habitat, the specific measures that are being implemented to conserve the California red-legged frog for the project, and the boundaries within which the project may be accomplished. Brochures, books, and briefings may be used in the training session as determined by the Service-approved biologist. Workers will be required to sign an acknowledgement form and will receive a hard hat sticker documenting their completion of the environmental awareness training.	No change in status. General compliance with measure is confirmed. All construction workers and administrative staff on site have attended Environmental Awareness Training developed by the Service-approved biologist. This includes all new employees on site. Sign-in sheets are being collected and retained for each training session. Project hardhat stickers are issued once training is completed to denote compliance. (MEASURE ACHIEVED)	No change in status. General compliance with measure is confirmed. All construction workers and administrative staff on site have attended Environmental Awareness Training developed by the Service-approved biologist. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 7	Before ground disturbing work activities begin each day, the Service-approved biological monitor will conduct a pre-construction survey and inspect under construction equipment and materials to look for California red-legged frogs. If a California red-legged frog is found during these checks or during construction, the Service-approved biological monitor will halt work that may affect the animal until the Service-approved biologist can move it out of harm's way.	No change in status. The Service-approved biologist continues to conduct surveys / inspections of the project site on an as needed basis. Compliance with this measure is denoted in Biologist field notes. There were no California Red-Legged Frog relocations or takes during the reporting period. (MEASURE ACHIEVED)	No change in status. The Service-approved biologist has performed all inspections as required before ground disturbance. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 8	The Service-approved biologist will be present at the work site during initial site disturbance activities, including installation of exclusion fencing, erosion and sediment controls, and until the applicant has completed all surface disturbance. For work during the rainy season when California red-legged frogs may be moving through the project area, the biological monitor will conduct daily clearance surveys each morning prior to the start of work to ensure California red-legged frogs have not moved into the area and the wildlife exclusion fence is in good condition. If a California red-legged frog is observed within the biological monitoring area, the biological monitor will immediately contact the construction superintendent and evaluate the location of the frog in relation to ongoing work. If the frog is located within the work area, all work within 200 feet of the individual will be halted, and the individual will be allowed to leave the area under its own volition, or the Service-approved biologist may be called to capture and relocate the individual. The biological monitor will also provide additional training to the project's key construction management personnel on all environmental requirements associated with the project, so they can ensure all avoidance and minimization measures for biological resources are followed when the biological monitor is not present.	The Service-approved biologist was present during initial site disturbance activities, including installation of exclusion fencing, erosion and sediment controls. The Service-approved Biologist continues to monitor the disturbance of any previously undisturbed areas. Compliance with this measure is denoted in Biologist field notes. No Red-Legged Frog relocations were necessary during the reporting period. (MEASURE ACHIEVED)	The Service-approved biologist was present during initial site disturbance activities, including installation of exclusion fencing, erosion and sediment controls. The Service-approved Biologist continues to monitor the disturbance of any previously undisturbed areas. Compliance with this measure is denoted in Biologist field notes. No Red-Legged Frog relocations were necessary during the reporting period. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9	Prior to the start of work, the contractor will prepare a Spill Prevention Plan to ensure prompt and effective response to any accidental spills. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur. All project-related hazardous materials spills within the project site will be cleaned up immediately. Spill prevention and cleanup materials will be on-site at all times during the course of the project. During construction/ground disturbing activities, all refueling, maintenance, and staging of equipment and vehicles will be located at least 100 feet from a drainage feature in a protected location where any potential spill would be contained and not drain directly toward aquatic habitat. The construction superintendent with support from the biological monitor will ensure contamination of habitat does not occur during such operations.	No change in status. General compliance with measure is confirmed. See Submittal #076: Spill Prevention, Control and Countermeasures (SPCC) Plan. Workers have received training and information pursuant to the SPCC and emergency response procedures. Spill prevention kits and other associated supplies are being maintained on site. There were no recorded spill incidents during the reporting period. (MEASURE ACHIEVED)	No change in status. See Submittal #37. Spill prevention measures and countermeasures are include in the approved project SWPPP. Workers have received training and information pursuant to the SPCC and emergency response procedures. Spill prevention kits and other associated supplies are being maintained on site. There were no recorded spill incidents during the reporting period. (MEASURE ACHIEVED).	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9a	All refueling, maintenance, and washing of equipment and vehicles will be located on paved areas in a location where a spill will not travel into a drainage feature or storm drain inlet. This fueling/staging area will conform to Best Management Practices (BMPs) applicable to attaining zero discharge of stormwater runoff into waters of the U.S. and State of California. At a minimum, all equipment and vehicles must be checked and maintained on a daily basis to ensure proper operation and avoid potential leaks or spills. Washing of equipment will occur only in a location where polluted water and materials can be contained for subsequent removal from the site.	No change in status. General compliance with measure is confirmed. The paved fueling and maintenance area was completed and in use by 4/29/20. The completion of the paved areas was reported to Coastal Commission with photo via email on 4/29/20. The paved fueling and maintenance area has been removed as part of project demobilization. (MEASURE ACHIEVED)	No change in status. The project work sites are mainly within paved City streets and the public right-of-way. Contractor has been reminded to only refuel equipment on pavement in locations where a spill would not travel into a drainage feature or storm drain inlet.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9b	A designated concrete washout location will be established onsite, in an area at least 50 feet from any drainage feature or storm drain inlet. The washout will be maintained and inspected weekly, and will be covered prior to and during any rain event. If a container is used, concrete debris will be removed whenever the washout container reaches the 1/2 full mark.	Structural concrete work is completed. Filanc provides a fully compliant washout area for each concrete placement event. Filanc has now removed all washout areas as part of project demobilization. Filanc's SWPPP includes Section 2.6, Section 3.3, and BMP WM-8, with stipulations for Concrete Waste Management. (MEASURE ACHIEVED)	Structural concrete work is on-going. Anvil provides a fully compliant washout area for each concrete placement event. Anvil's SWPPP includes the necessary BMPs and stipulations for Concrete Waste Management. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 9c	BMPs for dust abatement will be a component of the project's construction documents. Dust control requirements will be carefully implemented to prevent water used for dust abatement from transporting pollutants to storm drains leading to the creek channel.	No change in status. General compliance with measure is confirmed. Dust control water is not permitted to enter storm drains or adjacent creek channel. Design-Build Agreement Section 5.10.1 includes stipulations for a Fugitive Dust Control Plan (FDCP) in accordance with the San Luis Obispo County Air Pollution Control District Regulations. Dust control measures are being implemented during construction activities.	Dust control measures are being implemented during construction activities as required. Regular street sweeping is occurring on an on-going basis as required. Contract documents include appropriate stipulations for dust control measures, and the Contract work is bound by San Luis Obispo County Air Pollution Control District fugitive duct regulations. (MEASURE ACHIEVED).	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 10	To prevent inadvertent entrapment during construction, all excavated, steep-walled holes or trenches will be covered with plywood or similar materials at the close of each work day, or provided with one or more escape ramps constructed of earth fill or wooden planks. If trapped California red-legged frogs are observed, the Service-approved biologist will relocate the California red-legged frog.	No change in status. General compliance with measure is confirmed. All excavations on site are configured to prevent entrapment of wildlife during nonworking hours. (MEASURE ACHIEVED)	No change in status. General compliance with measure is confirmed. All excavations on site are configured to prevent entrapment of wildlife during non-working hours (exclusionary fencing or escape ramps are provided). (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 11	During project activities, all trash that may attract predators will be properly contained, removed from the work site, and disposed of regularly. Following construction, all trash and construction debris will be removed from work areas.	No change in status. Contractor continues to provide exemplary site housekeeping. (MEASURE ACHIEVED)	No change in status. Contractor has provided good site housekeeping to date, and there is no food waste being discarded at work sites or staging areas. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 12	Spoils will be stockpiled in disturbed areas that lack native vegetation. BMPs will be employed to prevent erosion in accordance with the project's approved Stormwater Pollution Prevention Plan.	Currently all stockpiles have been in disturbed areas. (MEASURE ACHIEVED).	No change in status. To date all stockpiles have been in previously disturbed areas, designated stockpile areas, or on paved areas with appropriate SWPPP measures deployed. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.



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United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 13	Vehicular traffic to and from the WRF construction site will use existing routes of travel. Cross-country vehicle and equipment use outside designated work areas will be prohibited.	No change in status. General compliance with measure is confirmed. Vehicle access corridors around the site, and mass excavation haul routes on site are established. Cross-country vehicle and equipment use is not necessary. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 14	Areas of disturbance will be minimized to the maximum extent practicable. Parking areas, new roads, staging, storage, excavation access routes, and disposal or temporary placement of spoils will be confined to the smallest areas possible. These areas will be flagged and disturbance activities, vehicles, and equipment will be confined to these flagged areas. Construction-related activities outside of the impact zone will be avoided.	General compliance with measure is confirmed. Vehicle access corridors around the site, and mass excavation haul routes on site are established.	No change in status. The project work sites are mainly within paved City streets and the public right-of-way. As such there is limited potential to impact undisturbed adjacent areas. New areas of disturbance will be avoided to extent possible, and are currently not anticipated.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 15	Nighttime lighting during construction of the WRF will be minimized to the maximum extent practicable. While regular nighttime work is not anticipated, nighttime lighting may be required during construction, but mitigation measures are required to ensure the lighting is shielded and pointed away from sensitive receptors such as the surrounding open space areas.	No change in status. Night work and/or nighttime lighting has been extremely minimal during the reporting period (only for time dependent work). (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 16	Workers will be prohibited from bringing pets and firearms to the project site and from feeding wildlife.	No change in status. Pets and firearms are restricted from site. (MEASURE ACHIEVED)	No change in status. Pets and firearms are restricted from site. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 17	To ensure that diseases are not conveyed between work sites by the Service-approved biologist, the fieldwork code of practice developed by the Declining Amphibian Populations Task Force will be followed at all times.	No change in status. Compliance with this measure is documented in Biologist field notes. (MEASURE ACHIEVED)	No change in status. Compliance with this measure is documented in Biologist field notes. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 18	The project proponent will conduct regular inspections and maintenance of the slatted chain link fence in order to ensure slats are in good condition to prevent entry of California red-legged frogs. This will occur at least twice yearly, with one inspection occurring within one month of the onset of the rainy season. The rainy season is defined as between October 15 and April 15.	The new slatted chain link fence has been installed at the perimeter of the developed WRF site. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 19	The applicant will develop and implement a revegetation plan that includes: location of the restoration, plant species to be used, restoration techniques, time of year the work will be done, identifiable success criteria for completion, and remedial actions if the success criteria are not achieved. All areas of temporary disturbance will be revegetated with an assemblage of native species, and locally collected plant materials will be used to the extent practical. All areas revegetated due to temporary disturbance will be monitored by a qualified biologist/restoration ecologist for five years following seeding and planting activities or until the final success criteria have been met.	During the reporting period, the contractor continued working to restore grasslands throughout the site including on cut and fill slope embankments, and in un-graded areas that were otherwise disturbed by construction. The required revegetation plan is a post construction consideration.	No change in status. The required revegetation plan is a post construction consideration - no applicable activities occurred this reporting period.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Proposed Action	California Red Legged Frog Item 20	Any use of herbicides during the routine maintenance landscaping and revegetated areas which occurs outside Water Reclamation Facility fence will be minimized.	No herbicides were used during the reporting period. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
United States Fish and Wildlife Service	Biological Opinion	Reporting Requirements	California Red Legged Frog REPORTING REQUIREMENTS Biological Opinion p. 31	Pursuant to 50 CFR 402.14(i)(3), EPA must report the progress of the action and its impact on the species to the Service as specified in this incidental take statement. The applicant, through a qualified botanist, will monitor the success of revegetation actions on areas of temporary disturbance for a period of 5 years after revegetation takes place. The EPA or applicant will provide yearly reports to the Service by January 31 of each year during the construction phase of the project. These reports will include the number and age class of California red-legged frogs that have been captured and relocated, and that have been found injured or dead. These reports will also include the dates and results of inspections of the chain link fence, as well as any repairs that were made to the fence, an analysis of whether the chain link fence is successful in excluding California red-legged frogs, and any suggestions for improvement.	The City has provided the Year 2022 Annual Report. (MEASURE ACHIEVED) During the entire project duration, including the current reporting period, zero (0 each) California Red-Legged Frogs have been captured, relocated, and/or found injured or dead. The WRF site permanent perimeter fencing has not been installed yet.	The City has provided the Year 2022 Annual Report. (MEASURE ACHIEVED) During the entire project duration, including the current reporting period, zero (0 each) California Red-Legged Frogs have been captured, relocated, and/or found injured or dead.	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	WRF Development Envelope Special Condition 1(a)	All WRF development shall be located within the development envelope as shown in CDP Exhibit 1.	The WRF is located within the development envelope as shown in the CDP. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.



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California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Rural Agricultural Theme Special Condition 1(b)	The design and appearance of all WRF development shall reflect a rural agricultural theme (i.e., simple and utilitarian lines and materials, including use of board-and-batten siding, corrugated metal, muted earth tone colors, etc.).	The design and appearance of the WRF development has been approved by the Coastal Commission and applicable design elements are encompassed in Issued For Construction documents. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Pump Stations and Related Development Design Special Condition 1(c)	All pump stations and related development design shall be sited and designed to limit impacts on public views as much as possible, including landscaping.	The design and appearance of the WRF development has been approved by the Coastal Commission and applicable design elements are encompassed in Issued For Construction documents. (MEASURE ACHIEVED)	Pump Stations A and B were sited and designed to limit impacts on public views, to the extent possible while facilitating project technical requirements. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Landscaping Special Condition 1(d)	Landscaping shall consist of native, non-invasive, and drought tolerant species that provide appropriate screening and softening of development features in public views as much as possible.	The DB Team engaged Firma Consultants (SLO CA) as the project Landscape Architects. Firma provided 100% plans and specs. The DB Team received competitive bids and selected KCI Environmental for the landscaping subcontractor. The City provided a cursory review of landscaping plans and found them to be in general compliance with CDP approval documents. Landscaping work is currently in progress at the WRF site.	NA - Not applicable to Conveyance Facilities Project.	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Lighting Minimization Special Condition 1(e)	Exterior lighting shall be wildlife-friendly, shall use lamps that minimize the blue end of the spectrum, and shall be limited to the minimum lighting necessary for pedestrian and vehicular safety purposes. All lighting (exterior and interior) shall be sited and designed so that it limits the amount of light or glare visible from Highway 1 to the maximum extent feasible (including through uses of lowest luminosity possible, directing lighting downward, etc.).	No change in status. Low intensity night lighting design elements are included in the Design-Build Team's "Issued For Construction" Plans/Specifications. (MEASURE ACHIEVED)	No change in status. Low intensity night lighting design elements are included in the Design-Build Team's "Issued For Construction" Plans/Specifications. (MEASURE ACHIEVED)	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Windows and Other Surfaces Special Condition 1(f)	All windows shall be non-glare glass, and all other surfaces shall be similarly treated to avoid reflecting light, and all windows shall be bird-safe (i.e., windows shall be frosted, partially frosted, or otherwise treated with visually permeable barriers that are designed to prevent bird strikes).	No change in status. Non-glare, non-reflective, and bird-safe exterior finishes and design elements are included in the Design-Build Team's "Issued For Construction" Plans/Specifications. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Utilities Special Condition 1(g)	Revised Final Plans shall clearly identify all utilities.	No change in status. All WRF site underground pipelines, conduits, and other utilities, are shown on the DB Team's Issued for Construction (IFC) plans. (MEASURE ACHIEVED). Any utility modifications to the IFC Plans are required to be posted on project Record Drawings.	No change in status. All Conveyance Facilities project underground pipelines, conduits, and other utilities (new and existing) are shown on the conformed construction drawings. (MEASURE ACHIEVED). Any utility modifications will be posted on project Record Drawings.	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Revised Final Plans	Stormwater and Drainage Special Condition 1(h)	...all project area stormwater and drainage is filtered and treated to remove expected pollutants prior to discharge and directed to existing stormwater inlets/outfalls as much as possible. Infrastructure and water quality measures shall retain runoff from the project onsite to the maximum extent feasible, including through the use of pervious areas, percolation pits and engineered storm drain systems. Infrastructure and water quality measures shall be sized and designed to accommodate runoff from the site produced from each and every storm event up to and including the 85th percentile 24-hour runoff event. In extreme storm situations (i.e., greater than the 85th percentile 24-hour runoff event storm) where such runoff cannot be adequately accommodated onsite through the project's stormwater and drainage infrastructure, any excess runoff shall be conveyed inland offsite in a non-erosive manner.	No change in status. A Stormwater Design Report (Hydrology Report) has been prepared and issued by Ashley Vance Engineering. The findings and recommendation in the report have been implemented in the Design-Build Team's "Issued For Construction" Plans/Specifications. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plan	Construction Plans Special Condition 2 (a, b, c, d, e, f, and j)	The Construction Plan shall, at a minimum, include the following: (a) Grading, (b) Construction Areas, (c) Construction Methods and Timing, (d) Traffic Control Plans, (e) Property Owner Consent, (f) Best Management Practices, and (j) Construction Specifications.	No change in status. The City's WRF Project Construction Plan, per Special Condition 2, includes all of the listed elements, and has been approved by the Coastal Commission. The approved and stamped "Construction Plan" is available for public review at the City's Field Office trailer. (MEASURE ACHIEVED)	No change in status. The City's Conveyance Facilities Project Construction Plan, per Special Condition 2, includes all of the listed elements, and has been approved by the Coastal Commission. The approved and stamped "Construction Plan" is available for public review at the City's Field Office trailer. (MEASURE ACHIEVED)	NA - Project is in pre-design phase.
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Post Construction Special Condition 2(g)	All construction areas shall be restored to their pre-construction state or better upon completion of work. Where appropriate and feasible, roads/sidewalks impacted by construction shall employ stormwater management infrastructure BMPs, including bioswales, pervious pavers, garbage traps, and vegetative strips.	During the reporting period, the contractor continued working to restore grasslands throughout the site including on cut and fill slope embankments, and in un-graded areas that were otherwise disturbed by construction. The required revegetation plan is a post construction consideration. No streets or sidewalks are being impacted by the project.	No change in status. Required construction restoration stipulations are encompassed in the Contract documents. All public and private improvements damaged or disturbed by construction will be restored to pre-existing conditions. No applicable activities occurred this reporting period	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Construction Site Documents Special Condition 2(h)	The Construction Plan shall provide that a copy of the signed CDP and the approved Construction Plan be maintained in a conspicuous location at each construction job site at all times, and that such copies shall be available for public review on request.	No change in status. General compliance with measure is confirmed. The approved Construction Plan and signed/stamped CDP approval documents are maintained in the Construction Management field office at the construction site for review by the public. (MEASURE ACHIEVED)	No change in status. General compliance with measure is confirmed. The approved Construction Plan and signed/stamped CDP approval documents are maintained in the Construction Management field office at 555 South Bay Blvd for review by the public. (MEASURE ACHIEVED)	NA - Project is in pre-design phase



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California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Construction Manager Special Condition 2(i)	The Construction Plan shall provide that a construction manager be designated to be contacted during construction should questions arise regarding the construction (in case of both regular inquiries and emergencies), and that his/her contact information (i.e., address, phone numbers, email address, etc.) including, at a minimum, a telephone number (with message capabilities) and an email that will be made available 24 hours a day for the duration of construction, is conspicuously posted at the job site where such contact information is readily visible from public viewing areas while still protecting public views as much as possible, along with indication that the construction manager should be contacted in the case of questions regarding the construction (in case of both regular inquiries and emergencies). The construction manager shall record the contact information (name, phone number, email, etc.) and nature of all complaints received regarding the construction, and shall investigate complaints and take remedial action, if necessary, within 24 hours of receipt of the complaint or inquiry. Any critical and/or significant complaints and related responses shall be reported to the Executive Director as soon as possible, and all complaints and all actions taken in response shall be summarized and provided to the Executive Director on a weekly basis.	No change in status. General compliance with measure is confirmed. A project Construction Manager has been designated by the City and is present at the site during working hours. Contact information is provided on the City's website and on project signs at the site. A Public Contacts Log is being maintained for all public inquiries and complaints. All complaints and inquiries to date have been addressed and/or responded to as necessary. (MEASURE ACHIEVED)	No change in status. General compliance with measure is confirmed. A project Construction Manager has been designated by the City and is present at the site during working hours. Contact information is provided on the City's website and on project signs at various work sites. A Public Contacts Log is being maintained for all public inquiries and complaints. All complaints and inquiries to date have been addressed and/or responded to as necessary. (MEASURE ACHIEVED)	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Construction Plans	Notification Special Condition 2(k)	The Permittee shall notify planning staff of the Coastal Commission's Central Coast District Office at least 3 working days in advance of commencement of construction, and immediately upon completion of construction.	No change in status. The 3 working day notification was provided. (MEASURE ACHIEVED)	No change in status. The 3 working day notification was provided. (MEASURE ACHIEVED)	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Riparian Enhancement Plan	Riparian Enhancement Plan Special Condition 3	Prior to the operation of the WRF, the Permittee shall submit two copies of a Riparian Enhancement Plan (REP) to the Executive Director for review and approval. The REP shall provide for riparian enhancement within the unnamed creek and riparian area adjacent to the water reclamation facility site...	Project Biologist (KMA) completed the Riparian Enhancement Plan (REP). The City submitted REP to Coastal Commission and CDFW. The City has received authorization to proceed from the Coastal Commission.	NA - Not applicable to Conveyance Facilities Project.	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Archeological Protection	Archeological Monitoring Special Condition 4	An archaeological monitor qualified by the Native American Heritage Commission shall be present during all ground disturbance (including grading activities), and shall be consulted to provide recommendations for subsequent measures for the protection and disposition of artifacts of historical or cultural significance in the event such artifacts are discovered.	No change in status. General compliance with measure is confirmed. Archaeological and Native American monitors were present during all applicable ground disturbance activities and daily logs were created and retained. No future monitoring is anticipated. (MEASURE ACHIEVED)	No change in status. The City has engaged Cogstone Resource Management Inc. for both Archaeological and Native American monitors on the project. (MEASURE ACHIEVED). The City has also retained Far Western Anthropological Research Group for the Phase 2 Monitoring Plan.	NA - Project is in pre-design phase.
California Coastal Commission	Coastal Development Permit 3-19-0463	Agricultural Mitigation Program	Agricultural Mitigation Program Special Condition 5	Prior to the operation of the WRF, the Permittee shall submit an Agricultural Mitigation Program to the Executive Director for review and approval. The Program shall specify the measures to be taken to mitigate for project agricultural impacts by providing an agricultural conservation easement over agricultural property of a similar quality as the project site, and of a type that is potentially threatened by urban development, at a ratio of at least 2:1 for the loss of agricultural land associated with the approved project (i.e., the easement must cover at least 30 acres of such agricultural land).	No change in status. The required Agricultural Mitigation Program is a future end of project consideration - no applicable activities occurred this reporting period.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Recycled Water Management Plan	Recycled Water Management Plan Special Condition 6	Permittee shall submit Recycled Water Management Plan (RWMP). The objective of the RWMP shall be to ensure that the maximum amount of tertiary-treated recycled water is produced, and the maximum amount of such water is used for beneficial reuse purposes, including injected underground in locations that will maximize its ability for groundwater replenishment....	NA -Not applicable to WRF Construction.	NA - Not applicable to Conveyance Facilities Project.	NA - Project is in pre-design phase.
California Coastal Commission	Coastal Development Permit 3-19-0463	Wastewater Treatment Plant Removal and Restoration Plan	Wastewater Treatment Plant Removal/Restoration Plan Special Condition 7	Prior to operation of the WRF, the Permittee shall submit two copies of a Wastewater Treatment Plant Removal and Restoration Plan to the Executive Director for review and approval. The Plan shall indicate how the existing wastewater treatment plant located at 160 Atascadero Road will be decommissioned and demolished, including through removal of all plant components (e.g., buildings, fences, storage tanks, etc.), and the site restored to a safe and level configuration roughly matching the surrounding areas. The WWTP site shall be restored within one year of WRF and Cayucos CSD operation.	No change in status. The required Existing Wastewater Treatment Plant Removal and Restoration Plan is a future end of project consideration - no applicable activities occurred this reporting period.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Outfall Assessment Plan	Outfall Assessment Plan Special Condition 8	Prior to the commencement of any marine development, including off-shore development on the Ocean Outfall, the permittee shall submit NOT APPLICABLE TO ANY CURRENT PROJECTS	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Wastewater Service Boundary	Wastewater Service Boundary Special Condition 9	Wastewater service to properties outside of the City's current wastewater service area, per Exhibit 3, shall be prohibited without an amendment to this CDP.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Coastal Hazard Risk	Coastal Hazard Risk Special Condition 10	The Permittee acknowledges coastal hazards including pump stations and pipelines in low-lying elevations. The Permittee assumes said risks such that the Coastal Commission is indemnified.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.



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California Coastal Commission	Coastal Development Permit 3-19-0463	Coastal Hazard Response	Coastal Hazard Response Special Condition 11	The Permittee acknowledges and agrees that the project will be constructed and used consistent with the terms and conditions of the CDP for only as long as the project components remain safe for use without additional measures beyond ordinary repair and maintenance as that term is defined in Section 30610(d) of the Coastal Act.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Public Rights	Public Rights Special Condition 12	The Permittee acknowledges and agrees that the Coastal Commission's approval of this CDP shall not constitute a waiver of any public rights that may exist on the properties involved.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Other Authorizations	Other Authorizations Special Condition 13	The Permittee shall provide documentation of authorizations from the RWQCB, SWRCB, CDFW, CSLC, NMFS, USACE, or provide documentation that such authorization is not required.	No change in status. The City provided documentation of all necessary agency authorizations prior to the start of construction. (MEASURE ACHIEVED)	The City provided documentation of necessary agency authorizations prior to the start of construction, except as noted below. Based on a miscommunication, the City's SHPO notification and formal authorization to proceed was delayed resulting in a 35-day calendar work stoppage between Tuesday, 2/16/2021, and Monday, 3/22/2021. The item has been resolved.	NA - Project is in pre-design phase.
California Coastal Commission	Coastal Development Permit 3-19-0463	Minor Changes	Minor Changes Special Condition 14	The Permittee shall undertake development in conformance with the terms and conditions of this CDP, including with respect to all Executive Director-approved plans and other materials, which shall also be enforceable components of this CDP. Any proposed project changes, including in terms of changes to identified requirements in each condition, shall either (a) require a CDP amendment, or (b) if the Executive Director determines that no amendment is legally required, then such changes may be allowed by the Executive Director if such changes: (1) are deemed reasonable and necessary; and (2) do not adversely impact coastal resources.	To date the Coastal Commission has been made aware of several project changes, related to a twice-occurring soil slip (landslide) on site, and changes to the CRLF barrier. The City continues to monitor the soil slip and the resulting potential visual impacts. The City has and will continue to adhere with the terms and conditions of the CDP.	To date the Coastal Commission (Coastal) has been made aware of several project changes including proposed design changes to mitigate impacts at CA-SLO-16, and requests for additional tree removals along the Bike Path portion of the Joint Trench alignment. The added tree removals were necessary to facilitate construction. The City has and will continue to adhere with the terms and conditions of the CDP.	NA - Project is in pre-design phase
California Coastal Commission	Coastal Development Permit 3-19-0463	Future Permitting	Future Permitting Special Condition 15	All future proposed development related to this CDP shall require a new CDP or a CDP amendment.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.
California Coastal Commission	Coastal Development Permit 3-19-0463	Indemnification	Indemnification Special Condition 16	The Permittee agrees to indemnify the Coastal Commission, including reimbursement of attorney fees.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Project.
City of Morro Bay	Design-Build Agreement	Section 3.2.4.3 – Construction Phase Responsibilities	Archeological Discovery	If a discovery is made of items of archaeological interest on site during excavation activities, the Design/Build Entity shall immediately cease excavation in the area of discovery and shall not continue until ordered by the Construction Manager. Design/Build Entity shall cooperate with and provide access to the City's Archaeologist and other monitoring services.	No change in status. There have been no discoveries of archaeological interest on site to date or during the reporting period. Daily logs by the Arch/Paleo monitor are being maintained in the project file.	In August 2021 an archeological artifact (bowl) was found at Pump Station A. Cogstone visited site and reviewed the find. Cogstone took possession of the find, prepared the requisite report, and have complied with SLOCAS (San Luis Obispo County Archaeological Society) curation plan for artifacts. Daily logs by the Arch/Paleo monitor are being maintained in the project file.	NA - Project is in pre-design phase
City of Morro Bay	Design-Build Agreement	Section 5.2 - Disadvantaged Business Enterprise Requirements	Disadvantaged Business Enterprise Requirements	The WRF Project is partially funded through the California State Revolving Fund (CASRF) Program for Clean Water. Part of the requirements of CASRF funding is compliance with Disadvantaged Business Enterprise (DBE) Requirements. The requirements and applicable forms are described below and in Exhibit G.	No change in status. DBE requirements are being adhered to, including the submission of Good Faith Effort documentation, DBE Utilization Report, etc. The Annual DBE Utilization Report was submitted as required. (MEASURE ACHIEVED).	No change in status. DBE requirements are being adhered to, including the submission of Good Faith Effort documentation, DBE Utilization Report, etc. The Annual DBE Utilization Report was submitted as required. (MEASURE ACHIEVED).	NA - Project is in pre-design phase
City of Morro Bay	Design-Build Agreement	Section 5.12.2 – Wages and Records	Davis-Bacon Wage Requirements	The Design/Build Entity and each subcontractor shall comply with the Davis-Bacon payrolls and basic records requirements as found in Exhibit H.	No change in status. During the reporting period, Certified Payrolls were submitted by the Design-Build Team and reviewed by the Construction Management consultant. Any irregularities have been, or are being, resolved. (MEASURE ACHIEVED)	No change in status. During the reporting period, Certified Payrolls were submitted by the Contractor and reviewed by the Construction Management consultant. Any irregularities have been, or are being, resolved. (MEASURE ACHIEVED)	NA - Project is in pre-design phase
City of Morro Bay	Design-Build Agreement	Section 5.14 – American Iron and Steel	American Iron and Steel	The Design/Build Entity and all of its subcontractors acknowledge to and for the benefit of the City and the State of California (the "State") it understands the goods and services under this Agreement are being funded with monies made available by the Clean Water State Revolving Fund and/or Drinking Water State Revolving Fund that have statutory requirements commonly known as "American Iron and Steel;" that requires all of the iron and steel products used in the Project to be produced in the United States ("American Iron and Steel Requirement"), including iron and steel products provided by the Design/Build Entity and its subcontractors pursuant to this Agreement.	No change in status. During the reporting period, AIS requirements were adhered to, including the submission of required documentation from applicable equipment and material suppliers. (MEASURE ACHIEVED)	During the previous reporting period, the City notified the contractor of several missing or omitted AIS substantiating documents. The Contractor has now provided all missing AIS documents. (MEASURE ACHIEVED)	NA - Project is in pre-design phase



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City of Morro Bay	Design-Build Agreement	Section 3.2.4.2 – Construction Phase Responsibilities	Competitive Bidding (Work)	Competitively bid all work not performed by the Design/Build Entity or its members or the Designated Subcontractors for packages that exceed \$200,000 in anticipated value.	No change in status. The Design-Build Team continues to adhere to the competitive bid requirement for all subcontracted work in excess of \$200K. (MEASURE ACHIEVED). The Construction Manager is monitoring this effort and reviewing documentation provided by the Design-Build Team.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
City of Morro Bay	Design-Build Agreement	Section 3.2.4.5 – Construction Phase Responsibilities	Competitive Bidding (Equipment)	Competitively procure all process equipment packages from the preapproved vendors as identified in, and in accordance with the Scope of Work (Exhibit B).	No change in status. All applicable process equipment vendors have been selected. The Construction Manager monitored this effort and reviewed documentation provided by the Design-Build Team.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to Recycled Water Facilities Project.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AES-1: Nighttime Construction Lighting.	Lighting used during nighttime construction, including any associated 24-hour well drilling, shall be shielded and pointed away from surrounding light-sensitive land uses.	No change in status. Night work and/or nighttime lighting has been extremely minimal during the reporting period. There have been a few activities completed after sunset. These events required temporary lighting for approximately 2 to 3 hours each.	Night work and/or nighttime lighting has been minimal during the reporting period. There have been several time critical activities completed after sunset for various reasons including to mitigate daytime traffic handling concerns. These events required temporary lighting for approximately 2 to 5 hours each.	NA - Project is in pre-design phase.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1a: Fugitive Dust Control Measures.	Construction projects shall implement dust control measures so as to reduce PM10 emissions in accordance with SLOAPCD requirements.	No change in status. Design-Build Agreement Section 5.10.1 includes stipulations for Fugitive Dust Control Plan (FDCP) in accordance with the SLO County APCD Regulations. The approved SWPPP includes applicable dust control measures. Dust control is being implemented during construction activities. (MEASURE ACHIEVED)	Dust control measures are being implemented during construction activities as required. Regular street sweeping is occurring on an on-going basis also as required. (MEASURE ACHIEVED). Contract documents include appropriate stipulations for duct control measures, and the Contract work is bound by San Luis Obispo County Air Pollution Control District fugitive duct regulations. (MEASURE ACHIEVED)	NA - Project is in pre-design phase.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1b: Standard Control Measures for Construction Equipment.	Standard mitigation measures for reducing NOx, ROG, and DPM emissions from construction equipment are required.	Standard measures for reducing NOx, ROG, and DPM emissions are being implemented as required. The facility's generator has been submitted and approved by SLOC APCD. (MEASURE ACHIEVED)	The two pump station generators were submitted to SLOC APCD. In Sept 2021, the City received a Notice of Incomplete Application from APCD. Health Risk Assessments (HRAs) have since been undertaken and submitted to APCD. While APCD had previously indicated that generator modifications would be required (DPF, SCR, DOC), the District has now issued Authority To Construct (ATC) permits for both pump station generators without emissions modifications.	NA - Project is in pre-design phase.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1c: BACT for Construction Equipment.	BACT for diesel-fueled construction equipment shall be implemented during construction activities at the project site, where feasible.	No change in status. BACT guidelines are being implemented where feasible. (MEASURE ACHIEVED)	The two pump station generators were submitted to SLOC APCD. In Sept 2021, the City received a Notice of Incomplete Application from APCD. Health Risk Assessments (HRAs) have since been undertaken and submitted to APCD. While APCD had previously indicated that generator modifications would be required (DPF, SCR, DOC), the District has now (this reporting period) issued Authority To Construct (ATC) permits for both pump station generators without emissions modifications.	NA - Project is in pre-design phase.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	AQ-1d: Architectural Coatings.	To reduce ROG and NOx emissions during the architectural coating phase, low or no VOC emission paints and finishes shall be used with levels of 50 g/L or less.	No change in status. No architectural coating work occurred during the reporting period. No change in status.	No change in status. No architectural coating work occurred during the reporting period	NA - Project is in pre-design phase
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-1: Construction Worker Environmental Awareness Training and Education Program.	Prior to the commencement, and for the duration of proposed construction activities, all construction workers shall attend an Environmental Awareness Training and Education Program, developed and presented by the Lead Biologist.	No change in status. All construction workers and administrative staff on site have attended Environmental Awareness Training developed by the project biologist. All new employees on site undergo training upon arrival. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	No change in status. All construction workers and administrative staff on site have attended Environmental Awareness Training developed by the project biologist. All new employees on site undergo training upon arrival. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	NA - Not applicable to Recycled Water Facilities. No construction in Q1
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-2: Avoidance and Protection of Biological Resources.	During proposed construction, operations and maintenance, and decommissioning the City and/or contractor shall implement general avoidance and protective measures.	No change in status. Contractor is implementing environmental avoidance and protective measures encompassed in these Mitigation Measures.	No change in status. Contractor is implementing environmental avoidance and protective measures encompassed in the Conveyance Facilities Contract documents and these Mitigation Measures.	NA - Project is in pre-design phase
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-3: Morro Shoulderband Snail	The following mitigation measures shall be implemented to avoid or minimize impacts to Morro Shoulderband snail (MSS): (1) During project design, if project components would be located in areas with soils and vegetation that could support MSS, then a qualified biologist shall conduct a survey to delineate the extent of potential habitat. The following project components have either been mapped as Baywood fine sands or dunes, or are in areas adjacent to known populations (see Figure 3.4.7): Option 5A lift station; pipeline alignment adjacent to WWTP; portion of the pipeline at Drainage 1A; and the northwest corner of the IPR-West wellfield. (2) At areas adjacent to vegetated areas to support MSS, silt fencing shall be installed, to restrict project activities into these areas and to deter MSS movement. (3) If avoidance of MSS habitat is not feasible, then protocol levels surveys for MSS shall be conducted to determine presence/absence and distribution of MSS. (4) If survey results are negative and a concurrence authorization is granted, then vegetation shall be removed under supervision of the permitted biologist, and the site(s) shall be graded/grubbed down to bare mineral soil, and bordered with silt fence to preclude MSS from subsequently entering the area(s). (5) If live MSS are found within areas proposed for impact, then consultation with USFWS will be necessary. (6) If equipment use, materials stockpiling, lift station construction, or any other uses are proposed on the north side of Atascadero Road opposite the existing WWTP, then all such areas shall have silt fencing to create a barrier between potential MSS habitat. (7) Work crews will undergo an environmental training session conducted by a qualified biologist prior to start of construction activities in or adjacent to MSS habitat areas.	NA -Not applicable to WRF Project. Morro Bay Shoulderband snails are not present at the WRF Site	No change in status. There was no activity in dune sands or Baywood fine sand during the reporting period. KMA has performed all necessary pre-construction inspections and on-going monitoring. To date only orange construction fencing has been necessary for area delineation, not silt fencing. KMA performed all required post rain or dense fog inspections as required.	NA - Not applicable to the Pilot Injection Well site.



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-4: American Badger.	A pre-construction survey for active badger dens will be conducted within the proposed construction impact footprint and surrounding accessible areas of the mapped annual grassland portions of the eastern pipeline alignment (between the WRF and Downing Street on the west; see Figures 3.4-3 through 3.4-5) and the WRF site at least two weeks prior to any ground disturbing activities. The survey will be conducted by a qualified biologist. In order to avoid potential direct impacts to adults and nursing young, no grading should occur within 50 feet of an active badger den as determined by the project biologist.	No change in status. The approved project biologist has conducted the required Pre-Construction Survey for active badger dens and provided the City documentation of results. There were no active badger dens discovered during the pre-construction survey. (MEASURE ACHIEVED)	No change in status. The approved project biologist has conducted the required Pre-Construction Survey for active badger dens and provided the City documentation of results. There were no active badger dens discovered during the pre-construction survey. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-5: Nesting Birds.	Mitigation measures are recommended to avoid or minimize impacts to nesting bird species, including special-status species and species protected by the Migratory Bird Treaty Act.	Not applicable to the WRF site.	No change in status. The approved project biologist has conducted the required Pre-Construction Survey to avoid or minimize impacts to nesting bird species. KMA has provided the City documentation of results. There were no active nests discovered during the pre-construction survey. (MEASURE ACHIEVED).	NA - Not applicable to Recycled Water Facilities. No construction in Q1
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-6: Riparian Habitat Avoidance	During proposed project design, a qualified biologist shall identify the project boundaries adjacent to Morro Creek and the allowable limits of construction activities to avoid direct and indirect impacts to riparian habitat. Those limits shall be used during proposed project design to identify a pipeline alignment that avoids impacts to riparian habitat as well as areas to be avoided for siting injection and monitoring wells. During construction, the riparian boundaries and limits shall be clearly flagged or fenced so that contractors are aware of the limits of allowable site access and disturbance. Areas to be preserved should be clearly flagged as off- limits to avoid unnecessary damage and potential erosion.	Not applicable to the WRF site.	The work near Morro Creek is complete. The Project Biologist (KMA) clearly identified the project boundaries adjacent to Morro Creek, and the contractor clearly delineated the allowable limits of construction, as necessary to avoid direct and indirect impacts to riparian habitat. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-7: Trenching Buffer for Jurisdictional Features	During construction of proposed project pipelines, trenching shall stop at least 50 feet away from jurisdictional features, such as the top of stream banks, riparian habitat and wetlands, and the remaining distance shall be installed using trenchless construction methods, such as horizontal directional drilling.	Not applicable to the WRF site. All work is within site perimeter temporary fencing, and is at least 50 ft from any adjacent creek or drainage channel. (MEASURE ACHIEVED)	The project work is generally buffered from creeks and designated drainage channels by at least 50 ft, except Morro Creek and Willow Camp Creek, where protective measures are installed. Construction at Morro Creek and Willow Camp Creek is on-going this period and is being closely monitored by the Service Approved Biologist (KMA). CDFW has indicated that a Streambed Alteration Agreement is NOT required at the Morro Creek Pipe Utility Bridge crossing.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-8: Construction BMPs to Protect Jurisdictional Features and Aquatic Habitat.	Mitigation measures should be implemented prior to and during construction near Morro Creek and Little Morro Creek, as well as Drainages 1, 1A, 1B, 2, 2A, 2B, 3, 3A, and 3B, and wetlands.	During a previous reporting period RWQCB issued two Notices of Violation (NOV). NOV dated 11/8/2021 was responded to by DB Team on 12/17/2021. NOV dated 12/20/2021 was responded to by DB Team on 1/7/2022. Both NOVs allege failure to implement soil cover and erosion control BMPs in inactive areas. The DB team has implemented extensive additional BMPs in response to NOVs. In January 2022, the City received confirmation from RWQCB that the NOVs have been adequately resolved.	No change in status. This Mitigation Measure is included in Contract documents, and is currently being implemented, for all construction near Morro Creek and Little Morro Creek, as well as Drainages 1, 1A, 1B, 2, 2A, and 2B. SWPPP BMP measures are always installed at the various work sites and laydown areas prior to the start of work as required. These installations are reviewed by the Project Biologist (KMA) and the project QSP (Anvil) prior to the start of construction activities.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-9: Preparation of a Frac-Out Contingency Plan	A Frac-Out Contingency Plan shall be prepared prior to initiation of construction activities that involve horizontal direction drilling activities. The Frac-Out Plan shall be implemented during HDD construction activities.	There is no horizontal directional drilling (HDD) on the project. As such, no frac-out plan is required. (MEASURE NOT APPLICABLE)	The project scope includes both Microtunneling, and Jack and Bore installations, but not horizontal directional drilling (HDD). With Microtunneling the “overcut” annulus is continuously lubricated with a low pressure slurry (5 psi). The low pressure clay slurry does not have the threat of frac-out as would be the case with HDD. As such, no frac-out plan is required. (MEASURE NOT APPLICABLE)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	BIO-10: Tree Protection	For public trees, protection will be established at a minimum distance of 1.5 times the dripline (i.e., the distance from the trunk to the outermost limits of leaves and branches). During development, orange construction fencing or sufficient staking to identify the protection area will surround each tree or clusters of trees.	NA -Not applicable to WRF Project.	All feasible efforts are being implemented to protect public trees. The main area of impact is along the Bike Path portion of the project (Sta 29-53). The City is proposing a post construction effort to revitalize the 70-ft wide project easement along the Bike Path. The City has engaged a landscape architect and created a conceptual design and 50% design of the Bike Path revitalization.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-1: Retention of a Qualified Archaeologist.	Within 30 days after the City’s approval of the final design plans and prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the City shall retain a Qualified Archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (U.S. Department of the Interior, 1983) to carry out all mitigation related to archaeological resources.	No change in status. The City retained Far Western Anthropological Research Group for the Phase 1 Monitoring Plan issued April 2020. The Design-Build Team retained Cogstone Resource Management Inc., on behalf of the City, for cultural resources measures. (MEASURE ACHIEVED)	No change in status. The City has engaged Cogstone Resource Management Inc. for both Archaeological and Native American monitors on the project. The City retained Far Western Anthropological Research Group for the Phase 2 Monitoring Plan. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-2: Pre-Construction Phase I Cultural Resources Survey.	Within 30 days after the City’s approval of the final design plans and prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall conduct pre-construction Phase I Cultural Resources Survey of all areas that have not been previously surveyed within the last 5 years.	No change in status. See the Phase 1 Monitoring Plan issued by Far Western Anthropological Research Group. (MEASURE ACHIEVED).	See the Phase 2 Monitoring Plan issued by Far Western Anthropological Research Group. (RESOLUTION PENDING).	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-3: Avoidance and Preservation in Place of Archaeological Resources.	The City shall avoid and preserve in place resources CA-SLO-16, -43, -165, -239, -2222, and -2845, and any other resources that are identified as potentially qualifying as historical resources or unique archaeological resources under CEQA, through proposed project re-design. Avoidance and preservation in place is the preferred manner of mitigating impacts to archaeological resources. Preservation in place maintains the important relationship between artifacts and their archaeological context and also serves to avoid conflict with traditional and religious values of groups who may ascribe meaning to the resource. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that avoidance and preservation in place of a resource is determined by the City to be infeasible in light of factors such as project design, costs, and other considerations, then CUL-4 shall be implemented for that resource. If avoidance and preservation in place of a resource is determined by the City to be feasible, then CUL-5 shall be implemented for that resource.	NA -Not applicable to WRF Project.	Regarding CA-SLO-16: During previous reporting periods Far Western and the City’s contractor completed all remaining investigations and excavations for Utility Bridge abutment and all trenches. The City has implement design revisions on trenching north of bridge by adding fill to raise finish grade, then installing pipelines just below added fill to mitigate disturbance of potential lower elevation deposits. Far Western monitoring is completed and the CA-SLO-16 site has been cleared to complete construction. (MEASURE ACHIEVED).	NA - Not applicable to the Pilot Injection Well site.



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-4: Development of an Archaeological Resources Data Recovery and Treatment Plan.	The Qualified Archaeologist shall prepare an Archaeological Resources Data Recovery and Treatment Plan for all significant resources that will be impacted by the proposed project.	No change in status. See the Phase 1 Monitoring Plan issued by Far Western Anthropological Research Group. (MEASURE ACHIEVED)	See the Phase 2 Monitoring Plan issued by Far Western Anthropological Research Group. Final approval with USEPA and SHPO is still pending.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-5: Development of a Cultural Resources Monitoring and Mitigation Program (CRMMP).	Within 60 days of the award of the contractor's bid and prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist shall prepare a Cultural Resources Mitigation and Monitoring Program (CRMMP) based on the final City-approved project design plans.	No change in status. See the Phase 1 Monitoring Plan issued by Far Western Anthropological Research Group in April 2020. (MEASURE ACHIEVED)	See the Phase 2 Monitoring Plan issued by Far Western Anthropological Research Group. Cogstone and Far Western are both working on the final reports for the Conveyance Facilities	NA - Not applicable to Recycled Water Facilities. No construction in Q1
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-6: Construction Worker Cultural Resources Sensitivity Training.	Prior to start of any ground-disturbing activities (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the Qualified Archaeologist, or his/her designee, and a Native American representative shall conduct cultural resources sensitivity training for all construction personnel.	No change in status. All construction workers and administrative staff on site have attended cultural resources sensitivity training. All new employees on site undergo training upon arrival. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	No change in status. All construction workers and administrative staff on site have attended cultural resources sensitivity training. All new employees on site undergo training upon arrival. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-7: Archaeological Resources Monitoring.	All project-related ground disturbance (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) shall be monitored by an archaeological monitor(s) familiar with the types of resources that could be encountered and shall work under the direct supervisor of the Qualified Archaeologist.	No change in status. Archaeological and Native American monitors were present during all ground disturbance activities to date. Daily logs were being created and retained. Project earthwork activities requiring monitors has been completed as of January 2021. (MEASURE ACHIEVED)	No change in status. Archaeological and Native American monitors have been and continue to be present during all ground disturbance activities during the reporting period. Daily logs are being created and retained. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-8: Native American Monitoring.	The City shall retain a Native American monitor(s) from a Tribe that is culturally and geographically affiliated with the project site (according to the California Native American Heritage Commission). The Native American monitor shall monitor all project-related ground disturbance (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil) and all ground disturbance related to subsurface investigation and data recovery efforts for discovered resources that are Native American in origin.	No change in status. Archaeological and Native American monitors have been present during all ground disturbance activities during the reporting period. Daily logs are being created and retained. Project earthwork activities requiring monitors has been completed as of January 2021. (MEASURE ACHIEVED)	No change in status. Archaeological and Native American monitors have been present during all ground disturbance activities during the reporting period. Daily logs are being created and retained.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-9: inadvertent Discovery.	In the event archaeological resources are encountered during construction of the proposed project, all activity in the vicinity of the find shall cease (within 100 feet), and the protocols and procedures for discoveries outlined in the CRMMP (see CUL-5) shall be implemented.	No archaeological resources were discovered during the reporting period. (MEASURE ACHIEVED)	No significant archaeological resources were discovered during the reporting period. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-10: Retention of a Qualified Paleontologist.	Within 60 days prior to the start of any ground-disturbing activity (i.e., demolition, pavement removal, pot-holing or auguring, boring, drilling, grubbing, vegetation removal, brush clearance, weed abatement, grading, excavation, trenching, or any other activity that has potential to disturb soil), the City shall retain a paleontologist who meets the (SVP) Standards (SVP, 2010) (Qualified Paleontologist) to carry out all mitigation measures related to paleontological resources.	No change in status. The Design-Build Team retained Cogstone Resource Management Inc. to, on behalf of the City, undertake all mitigation measures related to paleontological resources. (MEASURE ACHIEVED)	No change in status. The City has engaged Cogstone Resource Management Inc. for paleontological monitoring on the project. (MEASURE ACHIEVED). The City retained Far Western Anthropological Research Group for the Phase 2 Monitoring Plan.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-11: Paleontological Resources Sensitivity Training.	The Qualified Paleontologist, or his/her designee, shall conduct construction worker paleontological resources sensitivity training prior to the start of ground disturbing activities. In the event construction crews are phased, additional trainings shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the project site and the procedures to be followed if they are found. The City shall ensure construction personnel are made available for and attend the training and retain documentation demonstrating attendance.	No change in status. All construction workers and administrative staff on site have attended paleontological resources sensitivity training. All new employees on site undergo training upon arrival. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	No change in status. All construction workers and administrative staff on site have attended paleontological resources sensitivity training. All new employees on site undergo training upon arrival. Sign-in sheets are being collected and retained for each training session. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-12: Paleontological Resources Monitoring.	All ground disturbance in excess of 5 feet within areas that are mapped as younger alluvial gravel (Qa) and beach and dune sands (Qs) shall be monitored on a full-time basis during initial ground disturbance.	No change in status. Archaeological and Native American monitors were present during all ground disturbance activities. Daily logs are being created and retained. Project earthwork activities requiring monitors has been completed as of January 2021. (MEASURE ACHIEVED)	No change in status. Archaeological/Paleontological and Native American monitors were present during all ground disturbance activities during the reporting period. Daily logs are being created and retained.	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-13: Inadvertent Discovery of Fossils.	If construction or other proposed project personnel discover any potential fossils during construction, regardless of the depth of work or location, then work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery and made recommendations as to the appropriate treatment.	No potential fossils were discovered during the reporting period. (MEASURE ACHIEVED)	No potential fossils were discovered during the reporting period. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.



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State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	CUL-14: Inadvertent Discovery of Human Remains:	If human remains are encountered, then the City shall halt work in the vicinity (within 100 feet) of the discovery and contact the County Coroner in accordance with PRC section 5097.98 and Health and Safety Code section 7050.5.	No human remains were discovered during the reporting period. (MEASURE ACHIEVED)	No human remains were discovered during the reporting period. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	NOISE-1: Construction Noise Reduction Measures.	The City shall develop and submit a Construction Noise Reduction Plan to the building official prior to initiating construction activities during hours that are not included in the exemption under the Morro Bay Municipal Code. The City or its contractor shall implement the Construction Noise Reduction Plan.	No change in status. The Construction Noise Reduction Plan has not been developed or submitted as it is not anticipated that construction activities will occur during hours outside the MB Municipal Code exemption. (MEASURE ACHIEVED)	No change in status. The Construction Noise Reduction Plan has not been developed or submitted as it is not anticipated that construction activities will occur during hours outside the MB Municipal Code exemption. (MEASURE ACHIEVED)	NA - Not applicable to the Pilot Injection Well site.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	NOISE-2: Operational Noise Reduction Measures	Prior to final design of the proposed injection wells, the City shall prepare an Operational Noise Reduction Plan demonstrating that the proposed injection wells will not expose the nearest sensitive receptor to noise levels that would exceed the City's daytime and nighttime noise standards (see Table 3.11-4). The operational noise reduction plan shall be prepared by a qualified noise consultant. Once all noise reduction measures outlined in the Operational Noise Reduction Plan are implemented, the City shall measure noise at the nearest sensitive receptor property line to validate the effectiveness of the measures and to demonstrate that operational noise levels are below the City's noise standards.	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to the pre-design phase of the project
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	GEO-1: Geotechnical Investigation.	A geotechnical investigation shall be prepared by a certified engineer for all facilities involving substantial ground disturbance or excavation.	The Design-Build Team's Geotechnical Report was prepared and issued by Earth System Pacific on July 1, 2019. No Change in status. (MEASURE ACHIEVED)	The project Geotechnical Report was prepared and issued by Yeh & Associates on April 29, 2020. No Change in status. (MEASURE ACHIEVED)	The Pilot Injection Well construction and testing is part of the subject Geotechnical Investigation.
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	GEO-2: Post-Construction Site Restoration.	After construction of project pipelines, disturbed areas shall be managed to control erosion, including without limitation: repaving areas within roadways, restoring vegetated areas, and regrading surfaces to minimize changes in drainage patterns.	NA -Not applicable to WRF Project.	No change in status. Required construction restoration stipulations are encompassed in the Contract documents. All public and private improvements damaged or disturbed by construction will be restored to pre-existing conditions. No applicable activities occurred this reporting period	NA - Project is in pre-design phase
State Water Resources Control Board	Environmental Impact Report	Summary of Impacts and Mitigation Measures	TRAF-1: Traffic Control Plan.	Prior to the start of construction of project components that would occur within a roadway right-of-way, the City shall require the construction contractor to prepare a Traffic Control Plan. The Traffic Control Plan will show all signage, striping, delineated detours, flagging operations and any other devices that will be used during construction to guide motorists, bicyclists, and pedestrians safely through the construction area and allow for adequate access and circulation to the satisfaction of the City's Public Works Director and Fire and Police Chiefs.	There is very minimal work required by the DB team in the paved area where the WRF access road intersects with Teresa Road (to date only the PG&E and AT&T service connection trenches). Note that Teresa Road is a private road and utility easement (not City or State R/W). To date contractor has proceeded with traffic control in general compliance with MUTCD and WATCH manual.	No change in status. The Contractor is currently, and on an on-going basis, preparing and submitting Traffic Control Plans for the various project work locations in street rights-of way, as needed. The Traffic Control Plans are being reviewed by City Public Works, City Police, and City Fire Department.	NA - Not applicable to the Pilot Injection Well site.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Dust Control Requirements	Dust Mitigation Plan	Because the project will disturb more than one acre, a project-specific Dust Mitigation Plan is required. Grading operations must follow the dust mitigation requirements contained in the NOA ATCM.	No change in status. See Submittal #016: Asbestos Dust Air Monitoring Plan and the SLO County APCD approval letter. Grading operations to date have been in compliance with the dust mitigation requirements contained in the NOA ATCM. A final report on the project site NOA has been submitted to SLO County APCD. There was no detectable NOA in any air samples taken on site. (MEASURE ACHIEVED)	No change in status. Dust control measures are being implemented during construction as needed. Street sweeping is occurring on an as-needed basis as required. Contract documents include appropriate stipulations for dust control. Contract work is bound by SLOC APCD fugitive dust regulations. (MEASURE ACHIEVED). NOA is not applicable to the Conveyance Facilities project.	NA - Not applicable to the Pilot Injection Well site.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Section 5.0 – Air Monitoring Program	Asbestos Dust Air Monitoring	Because of the site's proximity to a sensitive receptor (an assisted-living facility on Teresa Drive), the APCD will require that an Asbestos Dust Air Monitoring Plan be submitted for approval prior to issue of a grading permit. The plan will specify procedures to be followed during construction and grading, including sampling locations/methods/frequency, analytical methods, and allowable thresholds.	No change in status. See Submittal #016: Asbestos Dust Air Monitoring Plan and the SLO County APCD approval letter. (MEASURE ACHIEVED)	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to the Pilot Injection Well site.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Section 6.2 – Mitigation Measures	Dust Mitigation Plan	At all times during construction, the CP will be present to ensure that the mitigations measures described in this section are properly carried out. The CP will monitor the implementation of the measures to minimize dust complaints and prevent visible emissions crossing the Project Boundary. Construction will take place during daylight hours between 7:00 AM and 7:00 PM. Mitigation measures were developed to address dust control during construction activities, as well as for post-construction maintenance of disturbed areas. Throughout construction, the amount of area disturbed shall be minimized to the extent practical. Per the Asbestos ATCM, the following sections outline the required dust mitigation practices (CARB, 2015): - Track-Out Prevention and Control Measures - Active Storage Piles - Disturbed Surface Area and Stockpiles that will Remain Inactive for more than Seven Days - Traffic On-Site on Unpaved Roads, Parking Lots, and Staging Areas - Earthmoving Activities - Off-Site Transport - Post-Construction Stabilization of Disturbed Areas	No change in status. The Design-Build Team has assigned a Competent Person. Project work related to NOA exposure was monitored by the project Geotech firm (Earth Systems Pacific) and project NOA consultant (Padre Associates). The risk of NOA exposure is diminished as applicable earthwork has been completed. (MEASURE ACHIEVED)	All construction activities have been completed	NA - Not applicable to the Pilot Injection Well site.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Decontamination	Dust Mitigation Plan	Equipment and trucks that come into contact with NOA-containing soil will be cleaned before leaving the Project site. Cleaning shall take within the Project boundaries, so that NOA soil remains on-site.	No change in status. All heavy equipment and/or trucks that access areas that may contain NOA are off-road vehicles that do not leave site. (MEASURE ACHIEVED)	NOA is not applicable to the Conveyance Facilities project.	NA - Not applicable to the Pilot Injection Well site.



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San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Signage/Notifications	Dust Mitigation Plan	Cal-OSHA and CARB regulations require signage and postings at job sites where NOA is, or may be, disturbed. Warning signs will be posted at the main entrances to the project for the duration of soil disturbance activities, and residents within the area will be notified by mail of the soil disturbance.	No change in status. NOA warning signs were posted at the main entrances to the project and remained in place for the duration of soil disturbance activities. Area residents were notified as required. (MEASURE ACHIEVED)	NOA is not applicable to the Conveyance Facilities project.	NA - Not applicable to the Pilot Injection Well site.
San Luis Obispo County Air Pollution Control District	Naturally Occurring Asbestos Permit	Documentation	Dust Mitigation Plan	Documentation of earthwork activities will be maintained by the Competent Person under the direct supervision of the Geotechnical Engineer of Record. Documentation records will be maintained by the Project Owner/Operator for a minimum of seven (7) years following the completion of the Project, and will be made available for inspection upon request by the SLOAPCD.	No change in status. All applicable work was completed under supervision of assigned Competent Person. The project work related to NOA was monitored by the project Geotechnical Engineering firm (Earth Systems Pacific) and the NOA consultant (Padre Associates). Applicable records are being maintained as required. (MEASURE ACHIEVED).	NOA is not applicable to the Conveyance Facilities project.	NA - Not applicable to the Pilot Injection Well site.
San Luis Obispo County Air Pollution Control District	Emergency Standby Generator(s)	Permit to Construct and Permit to Operate	Permit to Construct and Permit to Operate	The City shall submit SLOAPCD Diesel Engine Permit Application for project Emergency Standby Generator(s). The City shall obtain required SLOAPCD Permit to Construct and Permit to Operate as required.	No change in status. The City has submitted to SLOC APCD, the Diesel Engine Permit Application for project Emergency Standby Generator. The City has obtained the required Permit to Construct. (MEASURE ACHIEVED) The Permit to Operate is pending installation and commissioning of the equipment.	The two pump station generators were submitted to SLOC APCD. In Sept 2021, the City received a Notice of Incomplete Application from APCD. Health Risk Assessments (HRAs) have since been undertaken and submitted to APCD. While APCD had previously indicated that generator modifications would be required (DPF, SCR, DOC), the District has now issued Authority To Construct (ATC) permits for both pump station generators without emissions modifications.	NA - Not applicable to the Pilot Injection Well project.
San Luis Obispo County Air Pollution Control District	General Permit incl. Odor Control Facilities	Permit to Construct and Permit to Operate	Permit to Construct and Permit to Operate	The City shall submit SLOAPCD General Facility Permit Application for project site (et-al) including odor control facilities. The City shall obtain required SLOAPCD Permit to Construct and Permit to Operate as required.	The City submitted the SLOC APCD General Facility Permit Application for the project, which included the project's odor control system. The Permit to Construct has been issued by APCD. The Permit to Operate is pending installation and commissioning of the odor control equipment.	NA - Not applicable to Conveyance Facilities Project.	NA - Not applicable to the Pilot Injection Well project.
California State Historic Preservation Office	Phase 1 Monitoring Plan	Determining Activities Requiring Monitoring	PHASE 1 - WRF PROJECT Extent of Monitoring	 Only the initial three feet of topsoil removal in these areas will need to be monitored archaeologically. Once grading is complete, all subsequent construction work on site will either be within artificial fill or truncated bedrock and therefore archaeological and Native American monitoring will not be warranted. The archaeological monitor, in consultation with the archaeological Principal Investigator, the City's Project Manager, and the Construction Manager, will determine when monitoring is no longer necessary.	No change in status. Archaeological and Native American monitors have been present during all ground disturbance activities during the reporting period. Daily logs are being created and retained. Project earthwork activities requiring monitors has been completed as of January 2021. (MEASURE ACHIEVED)	No change in status. Archaeological and Native American monitors have been present during all ground disturbance activities during the reporting period. Daily logs are being created and retained.	NA - Not applicable to the Pilot Injection Well site.
California State Historic Preservation Office	Phase 2 Monitoring Plan	Determining Activities Requiring Monitoring	PHASE 2 - PIPELINE AND PUMP STATION PROJECT Extent of Monitoring	- Pipeline Station 27 to 37 CA SLO-16 ... HA1-6, C20-21, C45-50 ... Intact site deposit in HA1-3, C21, C47-48 and C50; disturbed site deposit in C46 and C49 ... Eligible for National Register - Pipeline Station 22 to 24 CA SLO-16 ... C5-C7 ... Thin layer of dense redeposited shell midden in C5 and C7 ... Not eligible for National Register due to lack of integrity. - Pipeline Station 53 to 61 CA SLO-239 ... C26-27, 51-54 ... Disturbed site deposit in C26-27, likely originating from SLO-239 ... Not eligible for National Register due to lack of integrity. - Replacement Portion of LS2 Force Main CA SLO-239 ... No, due to existing pipeline ... Archaeological construction monitoring. - New Addition to LS2 Force Main CA SLO-239 ... Trenching or coring after property acquired by City ... Likely will require archaeological construction monitoring - Pipeline Station 147 to 150 ... CA SLO-2232H ... HA20-22 Possible sparse intact Native American site deposit in HA20 ... Not eligible for National Register.	NA -Not applicable to WRF Project.	Regarding CA-SLO-16: During previous reporting periods Far Western and the City's contractor completed all remaining investigations and excavations for Utility Bridge abutment and all trenches. The City has implement design revisions on trenching north of bridge by adding fill to raise finish grade, then installing pipelines just below added fill to mitigate disturbance of potential lower elevation deposits. Far Western monitoring is completed and the CA-SLO-16 site has been cleared to complete construction. (MEASURE ACHIEVED).	NA - Not applicable to the Pilot Injection Well site.
California State Historic Preservation Office	Phase 3/4 Monitoring Plan (FUTURE)	Determining Activities Requiring Monitoring	PHASE 3/4 - RECYCLED WATER AND EXISTING TREATMENT PLANT PROJECTS Extent of Monitoring	PHASE 3 - INJECTION WELLS PROJECT: Project is in pre-design Phase PHASE 4 - EXISTING TREATMENT PLANT DEMOLITION: Project is in pre-design Phase	NA -Not applicable to WRF Project.	NA - Not applicable to Conveyance Facilities Project.	NA - Project is in pre-design phase
California State Historic Preservation Office	October 2019 Programmatic Agreement	Section 1.B City Roles and Responsibilities	Staff Professional Qualifications	City will ensure that all historic preservation and archaeological work is performed by, or under the direct supervision of, a person or persons who meet, at a minimum, the Secretary of the Interior's Professional Qualifications Standards (48 Federal Register 44738-44739) (Appendix A to 36 CFR §61) in the relevant field of study, as described under the Administrative Provisions of this Agreement. Hereinafter, such persons will be referred to as Qualified Professionals.	No change in status. The City retained Far Western Anthropological Research Group for the Phase 1 Monitoring Plan issued April 2020. The Design-Build Team retained Cogstone Resource Management Inc., on behalf of the City, for cultural resources measures. (MEASURE ACHIEVED)	No change in status. The City has engaged Cogstone Resource Management Inc. for paleontological monitoring on the project. The City retained Far Western Anthropological Research Group for the Phase 2 Monitoring Plan. (MEASURE ACHIEVED).	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 1 and Phase 2 Monitoring Plans	Construction Crew Archeological Awareness Training	Archeological Awareness Training	Prior to any soil-disturbing construction activities, the archeological monitor will conduct a five- to 10-minute oral archaeological awareness training for the construction crew, including all equipment operators and personnel involved in the mass excavation activities. The Native American monitor will also likely offer comments on their concerns.	No change in status. All construction workers and administrative staff on site have attended archaeological awareness training. All new employees undergo training upon arrival. Sign-in sheets are being collected and retained for each training session.	No change in status. All construction workers and administrative staff on site have attended archaeological awareness training. All new employees undergo training upon arrival. Sign-in sheets are being collected and retained for each training session.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 1 Monitoring Plan WRF	Reporting	Extent of Monitoring	The archaeological Principal Investigator will submit weekly status reports to the City detailing monitoring activities and any discoveries. The weekly status reports will include both archaeological and Native American daily monitoring logs, photos, and maps (as appropriate).	No change in status. Both archaeological and Native American daily monitoring logs were created and are being retained in the project's web based Project Management system. Project earthwork activities requiring monitors were completed as of January 2021. (MEASURE ACHIEVED)	No change in status. Both Archaeological and Native American daily monitoring logs are being created, submitted, and maintained in the City Construction Management project filing system.	NA - Not applicable to the Pilot Injection Well site and scope of work.



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California State Historic Preservation Office	Phase 1 Monitoring Plan WRF	Scheduling	Extent of Monitoring	If there are no findings, an Archaeological Resources Monitoring Report for Construction Phase 1 will be prepared and submitted to the City for review within 30 days of completion of monitoring activities.	There were no findings during the reporting period. The required Final Monitoring Report has been prepared and submitted to the City and to Central Coast Information Center, Department of Anthropology, UCSB. See Submittal 257.1. Project earthwork activities requiring monitors were completed as of January 2021. (MEASURE ACHIEVED)	In August 2021 an archeological artifact (bowl) was found at Pump Station A. Cogstone visited site and reviewed the find. Cogstone took possession of the find, prepared the requisite report, and have complied with SLOCAS (San Luis Obispo County Archaeological Society) curation plan for artifacts. The Final Monitoring Report will be prepared and submitted to the City and Central Coast Information Center, Department of Anthropology, UCSB, upon completion of monitoring activities.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 1 Monitoring Plan WRF	Archeological Monitoring Guidelines	Construction Monitoring	The Archaeological and Native American Monitors will observe soil disturbance during construction activities (e.g., manual or machine excavations, grading). The Archaeological monitor will observe consistency or changes in soils or may examine specific materials that may be cultural in origin.	No change in status. Archaeological and Native American monitors were present during all applicable ground disturbance activities on the project. Daily logs are being created and retained. Project earthwork activities requiring monitors were completed as of January 2021. (MEASURE ACHIEVED)	No change in status. Archaeological and Native American monitors have been present during all ground disturbance activities during the reporting period. Daily logs are being created and retained.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Reporting	Extent of Monitoring	The archaeological Principal Investigator will submit weekly status reports to the City detailing monitoring activities and any discoveries. The weekly status reports will include both archaeological and Native American daily monitoring logs, photos, and maps (as appropriate). If no archaeological materials are identified during construction monitoring, an Archaeological Resources Monitoring Report will be prepared and submitted to the City for review within 30 days of completion of monitoring activities. In accordance with Stipulation VI of the Programmatic Agreement, the City will provide the report to the EPA for review, who will in turn submit it to all Parties of the Agreement. The final Monitoring Report will be submitted to all Parties of the Agreement and to the Central Coast Information Center at the University of California, Santa Barbara. If archaeological remains are identified during monitoring and cannot be avoided, they will be evaluated and mitigated (if warranted) in accordance with the Archaeological Research Design and Treatment Plan (Kajankoski et al. 2019:Appendix E).	NA -Not applicable to WRF Project.	No change in status. Both Archaeological and Native American daily monitoring logs are being created and retained in the project's cloud-based file management system.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Scheduling	Extent of Monitoring	An archaeological monitor and Native American monitor shall be present according to a schedule agreed upon by the archaeological Principal Investigator and City Project Manager prior to the beginning of construction. The archaeological Principal Investigator will review all anticipated soil disturbing activities with the construction contractor to determine which could potentially expose archaeological deposits and when these activities will be taking place. A tentative schedule will be prepared for monitoring, with the understanding that it is flexible depending on construction progress and findings.	NA -Not applicable to WRF Project.	No change in status. Archaeological and Native American monitors have been present during all ground disturbance activities during the reporting period. Daily logs are being created and retained.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Archeological Monitoring Guidelines	Construction Monitoring	1. The archaeological Principal Investigator and archaeological monitor(s) will meet the Secretary of Interior's professional qualification standards for prehistoric archeology. 2. An Archaeological monitor will be present for all ground-disturbing activities in the pipeline segments and components where archaeological monitoring is recommended. 3. Local Native American community will request to monitor all Construction Phase 2 ground disturbance. A local archaeologist will assess discovery made by the Native American monitor. 4. The need for more than one archaeological and Native American monitors may be necessary if work in being conducted in a variety of locations. 5. The City Project Manager will provide the construction schedule (location, day, time, and nature of work) to the archaeological and Native American monitors. 6. The archaeological monitor(s) will have the experience and demonstrated ability to recognize all types of archaeological materials and features. 7. Native American monitors should be from groups listed on the Native American Heritage Commission list of interested individuals. 8. Should the need arise to record or collect samples and artifacts, the archaeological monitor shall immediately consult with the archaeological Principal Investigator. 9. The archaeological and Native American monitors will document monitoring activities in a daily log. 10. Monitors will take periodic digital photographs.	NA -Not applicable to WRF Project.	No change in status. The City has engaged Cogstone Resource Management Inc. for archeological and paleontological monitoring on the project. Cogstone has retained multiple local Tribal groups from the area and is sharing the monitoring duties equally amongst the groups. The City retained Far Western Anthropological Research Group for the Phase 2 Monitoring Plan.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-16 MITIGATION PLAN	Mitigation of project impacts to site SLO-16 under both Section 106 of the National Historic Preservation Act and the California Environmental Quality Act will be required as the site can be considered significant and avoidance not feasible. All work will be conducted in accordance with the project's archaeological treatment plan (Kajankoski et al. 2019) and needs to be approved by Caltrans within their right-of-way. A Native American monitor will be present to observe all archaeological excavations. Methods and extent of excavation will ultimately be determined once the deposits are exposed during construction excavation and initial hand excavations. Mitigation will require extensive support and collaboration from the project construction contractor who will need to secure the area and provide mechanical excavation equipment, operators, and support equipment. A location for deep reburial of human remains that may be encountered should be considered prior to construction, although ultimately the Most Likely Descendent will need to approve of this. Uncollected archaeological deposits will need to be permanently reburied on-site in accordance with the wishes of local Native American groups. Portions of the site not impacted by the project should be designated Environmentally Sensitive Areas with orange fencing. A short mitigation work plan can then be prepared and submitted to all interested parties for review.	NA -Not applicable to WRF Project.	Regarding CA-SLO-16: During previous reporting periods Far Western and the City's contractor completed all remaining investigations and excavations for Utility Bridge abutment and all trenches. The City has implement design revisions on trenching north of bridge by adding fill to raise finish grade, then installing pipelines just below added fill to mitigate disturbance of potential lower elevation deposits. Far Western monitoring is completed and the CA-SLO-16 site has been cleared to complete construction. (MEASURE ACHIEVED).	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-239 (STATION 53 TO 61)	Cores C26 and C27 both contained a small amount of disturbed archaeological deposits. This material almost certainly originated from site SLO-239 located on the higher terrace to the south. Additionally, adjacent Cores 51-54 contained trace amounts of disturbed shellfish. Therefore archaeological construction monitoring is recommended along the boundary of site SLO-239 between stations 53 to 61. Additional Testing Required: A recent addition to the LS-2 force main measures approximately 300 meters near SLO-239. The area also has an elevated buried site sensitivity. This project component could not be tested as it lies on private property with no permission to access. The City is currently acquiring the property through eminent domain. In accordance with the Programmatic Agreement, the component will be tested once access is secured. This would involve approximately 12 trenches or cores spaced at 25-meter intervals over a two day period. If disturbed deposits associated with SLO-239 are identified, monitoring for human remains will be recommended and an addendum to this test report prepared. If intact archaeological deposits are identified, they will be immediately evaluated and mitigated in accordance with the Treatment Plan and documented in the final report.	NA -Not applicable to WRF Project.	Regarding CA-SLO-239: Contractor trenched across zone during a previous reporting period. Work was guided by and monitored by Cogstone and Tribal monitors. Monitors sampled/screened excavated soils. Minimal findings were documented in monitor daily logs.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-2022 (STATION 138 TO 143)	Testing was conducted between Stations 138 and 143 due to the presence of site SLO-2022 that is visible in the roadcut immediately northeast of the ADI. Quintana Road is cut into the hillside that this site is situated upon as it descends in elevation to South Bay Blvd. Additionally, this area has the lowest buried site sensitivity due to the ancient age of the surface landform. Thirteen hand augers (HA7–19) were excavated split evenly between each side of the road adjacent to the ADI. Results were all negative despite processing samples from most augers (see Table 3). Therefore, no archaeological construction monitoring or mitigation is recommended for this segment. However, it is recommended that site SLO-2022 be designated an Environmentally Sensitive Area and be protected during construction with orange fencing or other measures.	NA -Not applicable to WRF Project.	Regarding CA-SLO-2022: Contractor trenched across zone during a previous reporting period. Work was guided by and monitored by Cogstone and Tribal monitors. Monitors sampled/screened excavated soils. Minimal findings were documented in monitor daily logs.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Phase 2 Monitoring Plan PIPELINES AND PUMP STATIONS	Section IV. TESTING RESULTS AND RECOMMENDATIONS	CA-SLO-2232H (Station 147 TO 150)	Stations 147 to 150 are adjacent to site SLO-2232H, where a prehistoric component was reported to have been recently discovered during construction of a housing complex to the south. After testing for this project was complete, communications with the archaeologist overseeing the housing complex work revealed that the prehistoric deposit (including human remains) encountered is in fact associated with site SLO-1183 and located more than 100 meters (330 feet) south of the ADI. Access constraints (numerous underground utilities) only allowed for three hand augers (HA20–22) to be excavated along the south side of the road. HA21 and HA22 were negative, while a possible sparse prehistoric site deposit was identified in HA20. It is possible that the materials recovered in HA20 originated from site SLO-2022 and were pushed downhill when Quintana Road was cut through the site. This very sparse deposit of uncertain integrity is recommended not eligible for the National Register. However, archaeological construction monitoring for human remains is warranted for this pipeline segment.	NA -Not applicable to WRF Project.	Regarding CA-SLO-2232H: Contractor trenched across zone during a previous reporting period. Work was guided by and monitored by Cogstone and Tribal monitors. Monitors sampled/screened excavated soils. Minimal findings were documented in monitor daily logs.	NA - Not applicable to the Pilot Injection Well site and scope of work.
California State Historic Preservation Office	Programmatic Agreement	Section IX – Annual Reporting	Annual Reporting	In addition to the final reports described within this Stipulation, EPA shall provide the Parties to this Agreement an annual update on the implementation of this Agreement. Such update shall include any scheduling changes proposed, any problems encountered, failures to adopt proposed mitigation measures, and any disputes and objections received in EPA's efforts to carry out the terms of this Agreement. The update will be due no later than December 31 of each year, beginning December 31, 2019 and will continue annually thereafter throughout the duration of this Agreement.	The 2023 Annual Report/Update was issued by EPA to SHPO for the period ending December 31, 2022 as required. The City and City's Program Manager provided data and information for the report. (MEASURE ACHIEVED).	The 2023 Annual Report/Update was issued by EPA to SHPO for the period ending December 31, 2023 as required. The City and City's Program Manager provided data and information for the report. (MEASURE ACHIEVED).	NA - Not applicable to the Pilot Injection Well site and scope of work.



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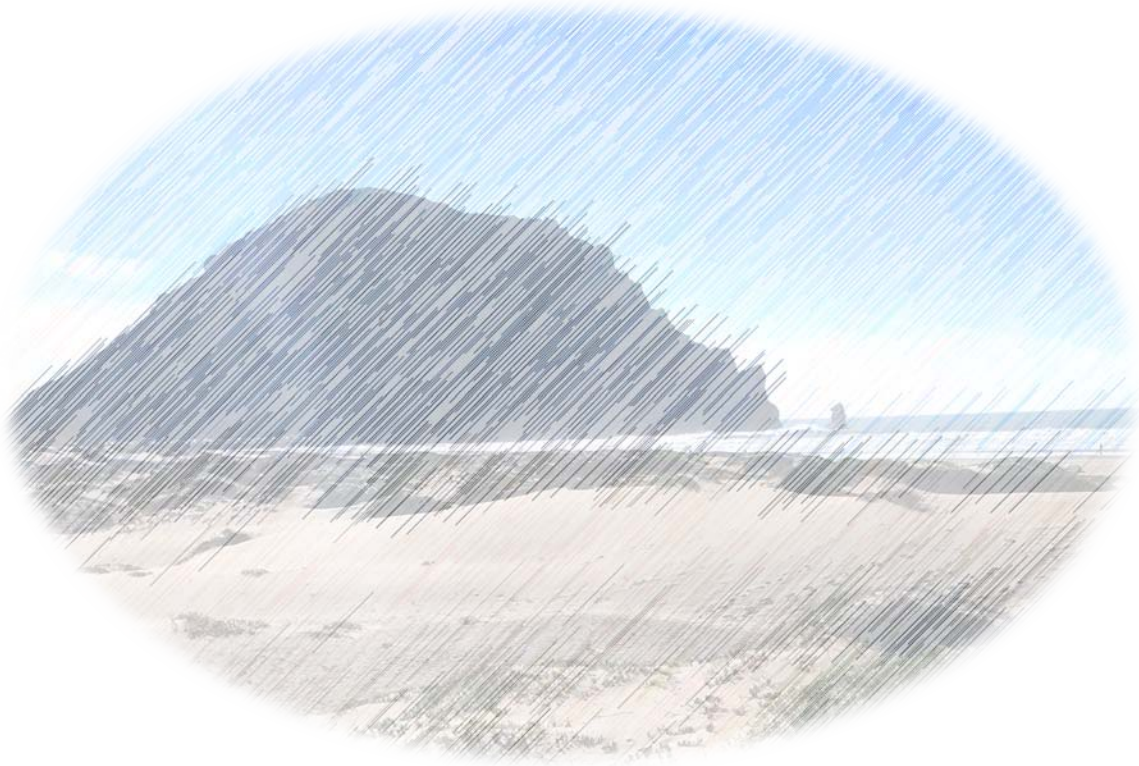


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Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 1.6 - Required Non-Compliance Reporting	Reporting Requirements	If a discharge violation occurs the QSP shall immediately notify the LRP and the LRP shall file a violation report electronically to the Regional Water Board within 30 days of identification of non-compliance using SMARTS. Corrective measures will be implemented immediately following the discharge or written notice of non-compliance from the Regional Water Board.	During a previous reporting period RWQCB issued two Notices of Violation (NOV). NOV dated 11/8/2021 was responded to by DB Team on 12/17/2021. NOV dated 12/20/2021 was responded to by DB Team on 1/7/2022. Both NOVs allege failure to implement soil cover and erosion control BMPs in inactive areas. The DB team has implemented extensive additional BMPs in response to NOVs. In January 2022, the City received confirmation from RWQCB that the NOVs have been adequately resolved.	No change in status. On April 6, 2021, there were separate incidents involving a ruptured water main and a ruptured sewer force main, at separate locations along Quintana Rd. Both incidents were caused by Contractor errors and resulted in non-stormwater discharges to storm drainage systems or water ways. The City and Contractor immediately implemented emergency spill containment and clean-up measures. The incidents were reported to appropriate regulatory agencies.	NA - Not applicable to the Pilot Injection Well site and scope of work.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 1.7 – Annual Report	Reporting Requirements	The General Permit requires that permittees prepare, certify, and electronically submit an Annual Report no later than September 1st of each year. Reporting requirements are identified in Section XVI of the General Permit.	The Annual Report was prepared by Contractor’s QSP and submitted prior to September 1, 2022, via SMARTs as required. (MEASURE ACHIEVED). The next SWPPP Annual Report will be submitted as required in the forthcoming reporting period, and no later than September 1, 2023.	The Annual Report was prepared by Contractor’s QSP and submitted prior to September 1, 2022, via SMARTs as required. (MEASURE ACHIEVED). The next SWPPP Annual Report will be submitted as required in the forthcoming reporting period, and no later than September 1, 2023.	NA - Not applicable to the Pilot Injection Well site and scope of work.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 3.2 – Erosion and Sediment Control	Control Measures	Erosion and sediment controls are required by the General Permit to provide effective reduction or elimination of sediment related pollutants in stormwater discharges and authorized non-stormwater discharges from the Site.	During a previous reporting period RWQCB issued two Notices of Violation (NOV). NOV dated 11/8/2021 was responded to by DB Team on 12/17/2021. NOV dated 12/20/2021 was responded to by DB Team on 1/7/2022. Both NOVs allege failure to implement soil cover and erosion control BMPs in inactive areas. The DB team has implemented extensive additional BMPs in response to NOVs. In January 2022, the City received confirmation from RWQCB that the NOVs have been adequately resolved.	No change in status. SWPPP BMPs are being installed in active work zones and approved by the Contractor’s QSP prior to the start of work. The required BMPs continue to be monitored and maintained during the reporting period.	NA - Not applicable to the Pilot Injection Well site and scope of work.
Central Coast Regional Water Quality Control Board	Stormwater Pollution Prevention Plan	Section 3.3 – Non-Stormwater Controls and Waste and Materials Management	Control Measures	Non-stormwater discharges into storm drainage systems or waterways, which are not authorized under the General Permit, are prohibited.	During a previous reporting period RWQCB issued two Notices of Violation (NOV). NOV dated 11/8/2021 was responded to by DB Team on 12/17/2021. NOV dated 12/20/2021 was responded to by DB Team on 1/7/2022. Both NOVs allege failure to implement soil cover and erosion control BMPs in inactive areas. The DB team has implemented extensive additional BMPs in response to NOVs. In January 2022, the City received confirmation from RWQCB that the NOVs have been adequately resolved.	On April 6, 2021, there were separate incidents involving a ruptured water main and a ruptured sewer force main, at separate locations along Quintana Rd. Both incidents were caused by Contractor errors and resulted in non-stormwater discharges to storm drainage systems or water ways. The City and Contractor immediately implemented emergency spill containment and clean-up measures. The incidents were reported to appropriate regulatory agencies as required.	NA - Not applicable to the Pilot Injection Well site and scope of work.

ATTACHMENT 2

**CITY OF MORRO BAY
WATER RECLAMATION FACILITY,
SAN LUIS OBISPO COUNTY, CALIFORNIA**
Coastal Development Permit #3-19-0463

**RIPARIAN ENHANCEMENT PLAN
ANNUAL MONITORING REPORT – YEAR 1**



Prepared for:

City of Morro Bay
595 Harbor Street
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Prepared by:



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December 2023

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APPENDICES

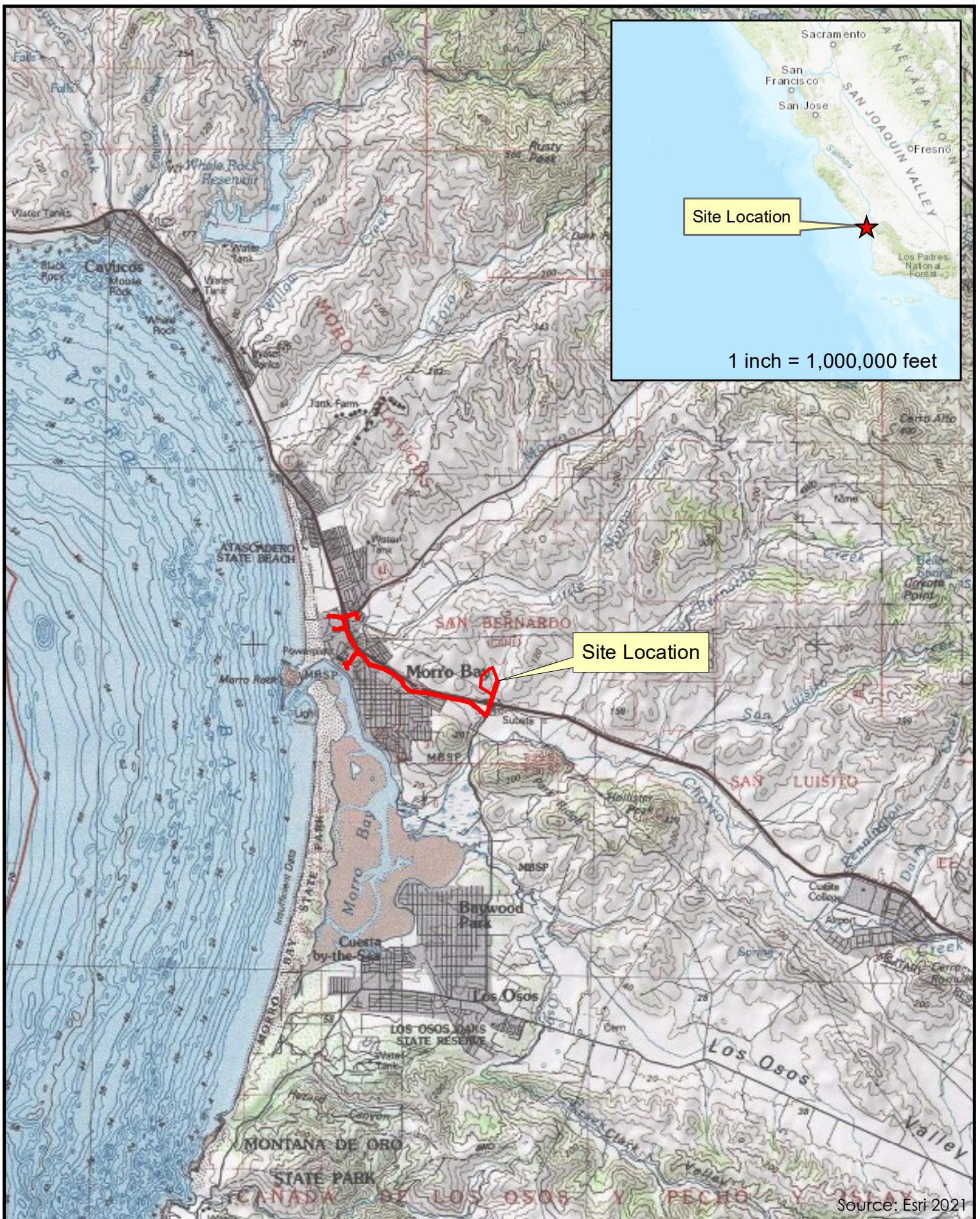
Appendix A – Photo Plate

1.0 INTRODUCTION

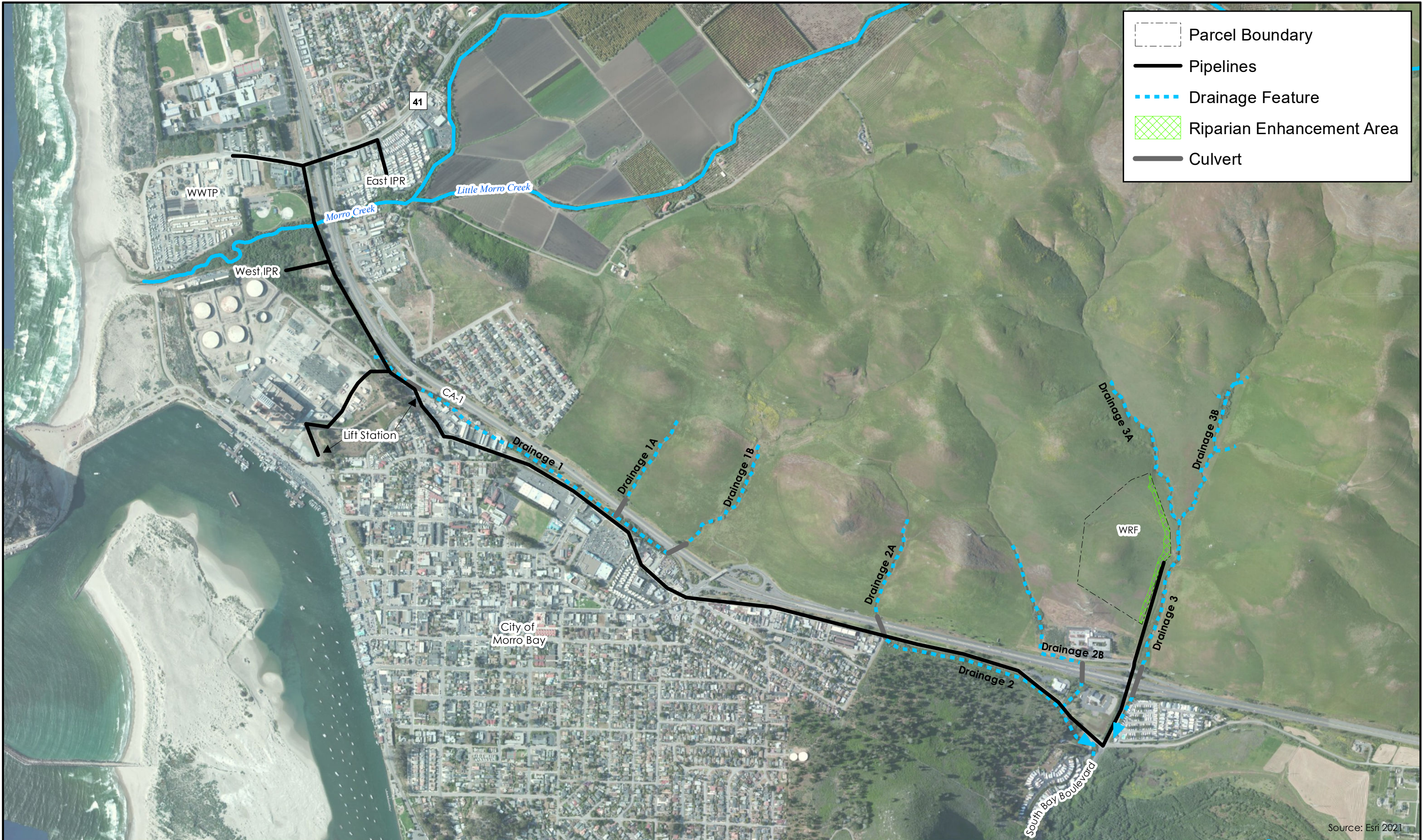
As part of implementation of the City of Morro Bay's Water Reclamation Facility Project (WRF), the City is restoring and enhancing native habitat conditions along the eastern property line of the WRF as detailed in the Riparian Enhancement Plan (Kevin Merk Associates, 2021; REP). While the project was designed to avoid impacts to drainage features and associated wetland and riparian habitats, Special Condition 3 of the Coastal Development Permit #3-19-0643 issued for the project by the California Coastal Commission required the REP be prepared to mitigate impacts to biological resources within the project's disturbance footprint. The REP is also an important component of the project's efforts to mitigate impacts to critical habitat of the federal threatened California red-legged frog (*Rana draytonii*) and a small erosion/drainage feature subject to California Fish and Game Code. The REP is being implemented consistent with the terms and conditions of the Biological Opinion 2020-F-0010 issued to the Environmental Protection Agency by the U.S. Fish and Wildlife Service to allow construction of the project in designated critical habitat. It is also being implemented consistent with Streambed Alteration Agreement #1600-2020-00410-R4 issued by the California Department of Fish and Wildlife for impacts to the erosion/drainage feature impacted at the WRF site. Lastly, the REP was developed to provide suitable locations to replace trees removed or impacted by the project's conveyance element.

The primary goal of the REP is to enhance and buffer the drainage corridor adjacent to the WRF by restoring and creating native habitat areas between the WRF and property line. This includes introducing native species in an effort to increase the abundance and diversity of native habitats within the WRF property. It also includes specific management elements such as removing non-native plants and caring for young container plants until they are successfully established on the site. The intent is to create a mosaic of riparian habitats consisting of grassland, coastal scrub, and coast live oak woodland that can also help function to provide long-term screening of the WRF. REP implementation is helping push the ecological system forward and jump start the trend towards becoming a self-sustaining community of native plants.

The City retained Kevin Merk Associates (KMA) to prepare the REP and oversee its implementation on an approximate 1.9 acre part of the WRF property located along the eastern edge of the constructed treatment facility. Please refer to Figures 1, 2, 3, and 4 for site location information. This first Annual Monitoring Report documents the Year 1 baseline site conditions (refer to Figures 4A-E), identifies photo-documentation points, and summarizes restoration activities conducted in 2022-2023. Figure 4 depicts the location of photo points and Figures 4A-4E identify container plants installed in 2022-2023. REP implementation was initiated by application of the native seed mix once initial grading of the WRF was done in the fall/winter 2021-2022. Container planting commenced in August 2022 and extended into October 2023 given the need for remedial plantings, and the Year 1 report provides both qualitative and quantitative monitoring results associated with project initiation. The report also provides an assessment of the initial compliance with the success criteria defined in the REP. Implementation methods, results, schedules, adaptive management strategies employed, lessons learned, and recommendations for monitoring Year 2 are also included herein.



Source: Esri 2021



Source: Esri 2021



Parcel Boundary

Development Footprint

Riparian Enhancement Area (83,604 ft. ²/ 1.9 acres)

Container Planting Zones (56,114 ft. ²/ 1.3 acres)

Photo Station

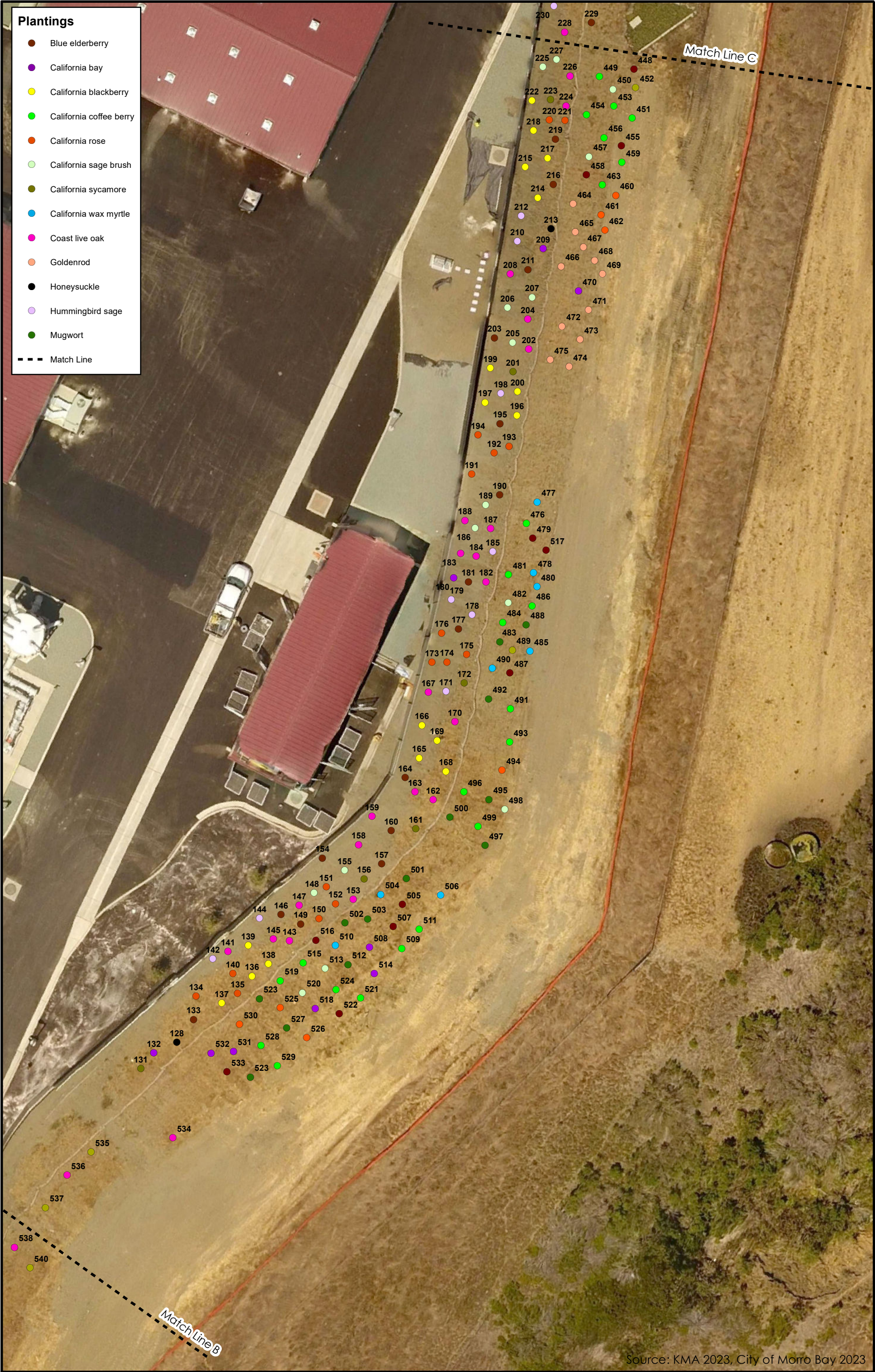
Drainage Feature

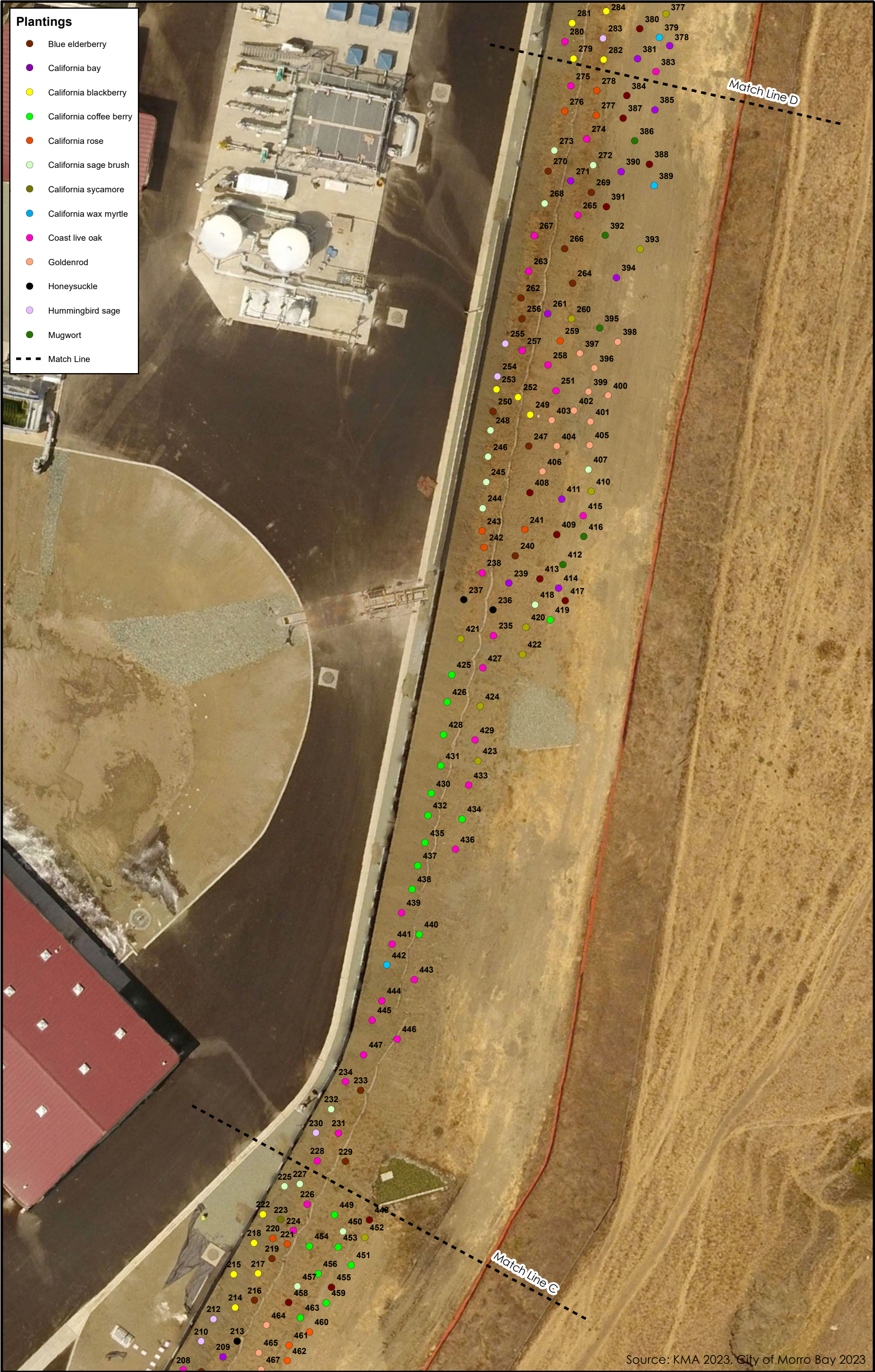


Sources: Esri 2023, Black and Veatch 2020











1.1 2022-2023 Restoration Activity Summary

Construction activities completed grading work at the WRF and prepared final contours on the slope below the facility for the native erosion control seeding and subsequent container plantings. Initial hydroseeding efforts occurred to stabilize bare soils around the WRF in the fall-winter 2021/2022. The temporary irrigation system was installed at the top of slope and container plant installation following the methods and techniques detailed in the REP. Initial planting was complete in August 2022. However, after container plantings were installed, a heat wave occurred that resulted in the loss of approximately 50% of the plants. The seed application provided excellent plant cover on the new slopes, which was able to stabilize the soils prior to heavy rains that fell in the winter 2022-2023. Still, some minor slope repairs were needed where erosion was observed. Slope repair work was completed in spring/summer 2023, and additional hydroseed was applied to cover the disturbance areas. Seed was also applied to zones with poor plant establishment, and then the entire REP area was watered using the temporary irrigation system.

The irrigation system was maintained during the spring and summer 2023 with sprinkler heads adjusted and additional sprinkler heads installed to ensure thorough coverage. Regular maintenance of the REP was completed by the landscape contractor and supplemented by the City and KMA during the 2022-2023 growing seasons. The replacement container plants were acquired and installed by the landscape contractor in October 2023 in the same general locations as the plants lost due to the heat wave in fall 2022. KMA then surveyed (tagged and GPS-ed) all container plants. As of the November 2023 monitoring visits, all 640 container plants proposed in the REP had been installed, with slight modifications to species and quantities based on availability.

Table 1. Restoration Activities Conducted in 2022-2023

Activity	Date	Location	Personnel
Final Slope and REP Area Preparation	June through August 2022	WRF	Filanc
Hydroseed Applications	2021-2023	REP and other temp disturbance at WRF	Dorman Hydroseeding and KCI
Container Plant Installation	August 2022 and October 2023	REP	KCI
Maintenance including Hand Weeding/Weed-Whacking	2022-2023	REP	KCI, City and KMA
Herbicide Application	October-November 2023	REP	KCI
Site Monitoring	Monthly Inspections 2022- 2023	REP	KMA
Annual Report Preparation	December 2023	NA	KMA

2.0 PLANT AND SEED SOURCES

The native seed mix used in hydroseeding efforts was acquired by the landscape contractors through S&S Seeds, as reviewed and approved by the restoration ecologist. The mix included all species identified in REP and followed the proposed application rate of 42 pounds per acre. In some locations, additional seed of native species was collected by KMA biologists and applied by hand broadcast methods to low vegetation cover zones within the REP area. Container stock was acquired by the landscape contractor through coordination with the restoration ecologist, and were initially installed in the three container planting areas identified in the REP in August of 2022. Due to high mortality, additional plants were acquired by the landscape contractor in fall 2023 and installed in the REP in October 2023 to replace the missing plants identified during monitoring.

3.0 PRE-ACTIVITY SURVEYS AND BIOLOGICAL MONITORING

All site preparation and planting activities occurred while construction of the WRF was underway, and the wildlife exclusion fence was in place around the entire property. KMA biologists conducted numerous pre-activity surveys of the project site during the course of WRF construction to ensure no special status species, nesting birds or other wildlife were disturbed while planting and maintenance occurred. KMA biologists were present throughout all planting and seeding activities in the REP area. No special status species were observed during the pre-activity surveys, and none were observed during biological monitoring of WRF construction including the work outside the facility footprint. Once WRF construction was complete and the perimeter fence in place around the facility, the wildlife exclusion fence was removed and a barbed wire fence installed along the eastern property line. Biological monitoring and environmental awareness training continued when landscape contractors or other activities occurred in the REP area.

4.0 WEED ABATEMENT AND MAINTENANCE ACTIVITIES

Weed abatement in 2022 and 2023 consisted of manual removal of non-native species and herbicide treatment of prickly ox-tongue (*Helminthotheca = Picris echioides*). The entire REP area was graded and disturbed during construction of the WRF, and all bare soils were stabilized with straw wattles and then hydroseeded. Container plant installation also included clearing vegetation including non-native weeds growing at planting locations. Mulch was also used around plantings to help maintain soil moisture and control weed growth. Hand removal of fennel (*Foeniculum vulgare*) and other broad-leaved species also occurred on an as-needed basis through the spring, summer and fall in an attempt to reduce non-native species cover on the site. Annual grasses such as wild oats (*Avena barbata*) and Italian ryegrass (*Festuca perennis*) were not pulled out by hand or treated with herbicide, but were weed-whacked to reduce seed set as these two species are common throughout grasslands on the site and in the region, and were aiding soil stabilization while the target vegetation established.

All herbicide applications were conducted by the landscape contractor, KCI. Herbicide was applied by qualified individuals using backpack sprayers under dry conditions with little to no wind. Application followed a pre-activity survey by KMA biologists to avoid impacts to wildlife. Additional treatments are planned to occur in the late winter and spring of 2024 to continue to combat weed growth following winter rains.

Maintenance activities consisted of trash and debris removal, and hand removal of non-native weeds that were not treated with herbicide (i.e., were in close proximity to container plants). Deer activity during the dry summer months increased due to the temporary irrigation keeping the grasses green onsite. As a result, browse damage was observed in the REP area with select container plants being topped. Rather than individually caging these container plants, Liquid Fence (an organic solution to deter herbivores) was sprayed on the more delectable species to deter deer browse from the restoration area. Liquid Fence was also used to deter ground squirrels from burrowing on the slope in several areas.

5.0 MONITORING RESULTS

The first year's monitoring efforts established the baseline conditions of the REP area once hydroseed was applied and container plants installed. Monitoring occurred monthly throughout 2022 and 2023 to oversee the hydroseed application, installation of container plants, and track vegetation establishment. Maintenance also occurred on a monthly basis during this period consistent with the schedule included in the REP, and removed weeds and trash from the site on an as-needed basis. The qualitative data component of the monitoring program included establishing photo points to track the restoration activities, assessing wildlife use of the site, and identifying locations of non-native plants to be targeted during maintenance efforts. Select observation points were also established to collect information on species composition and vegetation cover of the REP area. Representative sample points were identified in the field in between container planting areas in an effort to characterize the dominant species from seed application, and will be used to document changes in vegetation overtime. The monitoring effort also evaluated the irrigation program and relayed that information to the landscape contractor to make adjustments as needed. Quantitative data were also collected in regards to vegetation cover on the slopes of the REP zone at observation points, and number and health (recorded as vigor) of container plants.

5.1 Qualitative Assessment Results

The REP is being implemented on a portion of the WRF site that was graded and disturbed resulting in bare soils that were seeded and planted with native species. Baseline conditions of the project area characterized the site as non-native grassland that consisted of a predominance of non-native species resulting from many years of intensive grazing. Prior to construction of the WRF, the REP area was dominated by Italian ryegrass, prickly ox tongue, fennel, black mustard and wild oats. Ruderal or bare soil areas were also present in the general area as it was used as a watering and feeding location for cattle. The cattle trails and laydown areas supported very little vegetative growth with patches of non-native species such as prickly ox tongue and fennel that were not eaten by cattle. Drainage 3, the intermittent drainage to the east of the WRF, was composed primarily of coyote brush (*Baccharis pilularis*) scrub growing along a narrow incised channel with isolated occurrences of arroyo willows (*Salix lasiolepis*).

The hydroseed application in the REP area has resulted in a predominance of native species between the WRF and property line. Vegetation consisted primarily of meadow barley (*Hordeum brachyantherum*) and California brome (*Bromus carinatus*) with other herbaceous species such as California poppy (*Eschscholzia californica*) and tomcat clover (*Trifolium willdenovii*) also present. Several shrubs and subshrubs such as deerweed (*Acmispon glaber*) were slow to germinate after the initial hydroseed application, but were becoming more prevalent during the 2023 monitoring. Similarly, California sagebrush that was included in the seed mix was slow to germinate, but is now visible in several areas of

the site. KMA biologists also hand collected native seed from the site and broadcast it onto select areas with lower areal cover. This included species such as sky lupine (*Lupinus nanus*) and coyote brush being applied to areas away from the container plantings. Overall, the qualitative assessments have shown that habitat conditions in the REP zone are now dominated by native plants mostly as a result of the hydroseed application. While the container plants are still young and small in size, the restoration efforts are moving the site toward the goal of establishing native riparian habitats that will enhance the Drainage 3 corridor and buffer it from the WRF.

5.2 Quantitative Assessment Results

Per the REP, quantitative assessments are scheduled to be conducted in the spring and fall of each year to track vegetation establishment and survivorship of container plants. Three approximately 10x10 meter sampling points (100 square meter plot) were positioned in between the identified container planting zones to generally characterize species composition from seed applications. In addition, all container plantings were individually counted, tagged and mapped using a GPS unit (Trimble GeoXH6000) to ensure the final success criteria identified in the REP are met. Annual performance standards and final success criteria are identified in the table below:

Table 2. Annual Performance Standards from REP.

Performance Standards	Year 1	Year 2	Year 3	Year 4	Year 5
Percent Native Cover of Seeded Areas	50%	60%	70%	75%	75%
Percent Surviving of Container Plants	90%	85%	80%	80%	80%
Average Vigor Rating of Container Plants	1.5	1.5	1.5	1.5	1.5

In May 2023, it was estimated that approximately 81% of the REP site was dominated by native species consisting primarily of herbaceous species introduced to the site via hydroseed. This exceeds the Year 1 performance standard set for percent native cover of seeded areas by over 30%. The primary species observed in hydroseed application areas were bunch grass including California brome and meadow barley along with California poppy and tomcat clover. Non-native species, primarily prickly ox-tongue, composed approximately 19% of the site, which is within the allowable threshold defined in the REP.

As stated previously, initial container planting occurred in August 2022 with 640 one gallon container plants installed in the three areas specified in the REP. A heat wave occurred immediately following installation in 2022, and malfunctions in the temporary irrigation system resulted in approximately 311 plants dying (almost 50%). Following additional slope restoration work from rill erosion resulting from large winter storms in 2023, an additional 311 container plants were installed on the site to replace those lost during the heat wave. As of the fall 2023 monitoring effort, 629 of the 640 container plants, approximately 81%, were alive and well with an average vigor rating of 2. Some plants received a vigor rating of 3 due to the assessment occurring in October when deciduous species are starting to senesce or due to browse damage from deer. Refer to Table 3 containing the breakdown of native container plants proposed in the REP compared to what was observed during the first monitoring year. Due to plant availability issues, California goldenrod (*Solidago californica*), California sagebrush, and an increase in coast live oak were used to meet the number of container plants proposed in the REP.

Table 3. Container Plant Summary

Scientific Name	Common Name	No. Proposed	No. Observed
<i>Artemisia californica</i>	California sagebrush	0	17
<i>Artemisia douglasiana</i>	mugwort	75	72
<i>Frangula californica</i>	California coffeeberry	50	44
<i>Lonicera hispidula</i>	honeysuckle	25	8
<i>Mimulus aurantiacus</i>	monkey flower	50	0
<i>Myrica californica</i>	California wax myrtle	50	29
<i>Platanus racemosa</i>	California sycamore	25	40
<i>Quercus agrifolia</i>	coast live oak	90	118
<i>Rosa californica</i>	California rose	50	66
<i>Rubus ursinus</i>	California blackberry	50	46
<i>Salvia spathacea</i>	hummingbird sage	75	33
<i>Sambucus nigra ssp. caerulea</i>	blue elderberry	50	78
<i>Solidago californica</i>	California goldenrod	0	40
<i>Umbellularia californica</i>	California bay	50	38
Totals		640	629

5.3 Compliance with Success Criteria

The WRF REP site is composed of historic non-native grassland habitat dominated by weeds that was graded to construct the facility. The soils between the WRF and eastern property line are now stabilized by the native seed mix and supports a predominance of native grasses. Also present are 629 container plants of varying species, of which 196 are native trees composed of 40 California sycamores, 118 coast live oaks, and 38 California bays (refer to Figures 4A-4E). This equates to 98% of container plants alive at Year 1, which surpasses the Year 1 performance standard of 90%. The average vigor rating recorded in 2023 was 2, and nearly all plants were in good condition. The goal to have an increase in native vegetation cover consisting of a mix of trees, shrubs and grasses that will be self-sustaining by the end of the monitoring period is being met. The REP implementation effort has reduced the amount of bare soil and extent of non-native species present on the site prior to the project. In addition, REP implementation has reduced the associated erosion potential on the site, and will allow the transition over time from disturbed non-native grassland to a mosaic of riparian habitats that co-mingle with the drainage corridor to the east of the WRF.

The Year 1 monitoring observations have confirmed that the project is removing invasive and non-native species in the enhancement area, and restoration with native species is underway. The native seed mix applied to the REP area has also increased the habitat functions and values by increasing native plant cover onsite. With the developing container stock, a more varied habitat structure will be created overtime that will also provide visual screening between the WRF and surrounding undeveloped lands. The REP implementation effort has also enhanced habitat connectivity around the WRF for a variety of wildlife including the California red-legged frog. It has also provided a location to plant 196 native trees to compensate for the 27 trees impacted along the conveyance element of the project.

Table 4 below provides a summary of the success criteria established in the REP for monitoring year 1:

Table 4. Success Criteria Summary

Attribute		Year 1		Comments
		Criteria	Actual	
Quantitative	Percent Native Cover of Seeded Areas	50%	81%	Vegetation cover of sample areas on REP area equated to approximately 81% areal cover of native grasses (primarily meadow barley and California brome) with 19% areal cover of non-native species including Italian ryegrass and prickly ox-tongue.
	Average Vigor Rating for Container Stock*	1.5	2	Container stock was alive and successfully establishing. New container stock had vigor of 1 with some existing material planted in 2022 given vigor ratings of 3 resulting in average of 2. It is expected that with the ongoing maintenance work and additional container stock installed, planted species will become established healthy specimens and will meet the 1.5 vigor rating requirement in Years 2-5.
	Plant Survival	90%	98%	Planting activities in 2022 and 2023 resulted in 629 of the 640 container plants specified in REP alive and well.
	Have at least 27 trees establishing in the REP area to mitigate tree removal for the conveyance element.	Met	196 trees present	REP implementation resulted in 196 trees alive in specified areas (40 sycamore, 118 coast live oak, and 38 CA bay).
	Percent of Non-Native Species Cover	<50%	19%	Approx. 81% cover of native species within REP area. 19% areal cover of non-native species was primarily composed of Italian ryegrass and prickly sow thistle with a minor amount of black mustard.

Attribute		Year 1		Comments
		Criteria	Actual	
Qualitative	Maintain a dominant, multi-level cover of native woodland and scrub plant species, with exotic weed percentages constituting no more than 25% of the total plant coverage by the end of 5 year monitoring.	Met	Met	Native grasses from hydroseed application were dominant in Year 1 and increased overall native species diversity compared to the baseline conditions observed prior to construction of the WRF. Container stock is young and small, and will continue to develop into varied structure habitats overtime.
	Evaluate site conditions with overall habitat conditions along the Drainage 3 corridor and surrounding grasslands to evaluate climatic influences on plant associations.	Met	Met	Project construction avoided the Drainage 3 corridor, and the REP area has now established with native grasses and forbs introduced by seed. Container plants consisting of native trees, shrubs, and herbaceous species are establishing in specified zones, and will overtime create a mosaic of plant communities of higher quality than were onsite prior to construction activities.

*Plant health and vigor will be measured for container plants as follows: 1 = excellent – vigorous healthy plant (no necrotic or chlorotic leaves); 2 = good – plant healthy with limited signs of vigorous growth; 3 = adequate – plant healthy, but with no signs of vigorous growth, and some necrosis or other damage present; 4 = poor – low vitality, or main stem dead but basal sprouts emerging; and, 5 = dead – no evidence of recovery.

6.0 PROBLEMS IDENTIFIED AND CORRECTIVE ACTIONS TAKEN

Historic ranching activities on the WRF site and neighboring property to the east have created areas of dense non-native species cover that will continue to spread propagules onto the site. As part of the initial Year 1 activities, KMA worked with the landscape contractor and City to develop maintenance standards to identify noxious weeds to target for removal during plant establishment. The use of mycorrhizal inoculum on the slope during seeding and planting has also helped native plants develop and continue to establish onsite and compete with these non-native weed occurrences.

The use of Best Management Practices (BMPs) during WRF construction helped the project avoid and minimize indirect impacts to offsite resources. The BMPs coupled with the native seed application on the REP area minimized soil disturbance areas that could become established with the opportunistic non-native weedy species. Regular monitoring and seasonal maintenance will continue to implement BMPs and remove non-native plants while the target vegetation becomes self-sustaining.

Permanent barbed wire fencing is in now place along the property boundary, and the facility is surrounded with chain link fence along with an exclusion wall along the site entrance road. Deer and other herbivores in the area are attracted to the green grasses

being maintained by the temporary irrigation system. While not all of the container plants are palatable to deer, some browse damage was observed, and a variety of deterrence techniques are being used. KMA biologists have installed reflective tape and applied Liquid Fence in an effort to deter deer and other herbivores such as ground squirrels from the REP area at the WRF.

7.0 CONCLUSIONS AND RECOMMENDATIONS

The implementation of the REP on the WRF site is off to a good start. Seed application and initial planting has been accomplished consistent with the methods and techniques described in the REP, which has resulted in an increase in native species cover on the site. Maintenance and initial herbicide application has targeted non-native grasses, prickly ox tongue, fennel, and white topped hoary cress (*Lepidium draba*). Monitoring confirmed these species were successfully managed throughout the site. Given the long agricultural history of the site, it is likely that additional seed bank will be expressed during this winter rain season, and spring herbicide treatment and other maintenance activities are scheduled to occur in spring and summer 2023, and will be timed dependent on environmental conditions.

The first year restoration efforts have been successful at introducing native plants and reducing non-native species cover on the site. The adaptive approach to site restoration will continue to use broadcast seeding of native grasses and forbs collected onsite, coupled with care of container plants and control of non-native species. Approximately 1.3 acres of upland habitat were planted with container stock, and the entire REP area (1.9 acres) had native seed applied by hydroseed and hand broadcast methods. Although the container stock is young, the seed application has resulted in stabilized soils with a predominance of native species. Restoration work to date has resulted in positive changes relative to native species composition onsite and monitoring confirmed that the Year 1 goals and objectives detailed in the REP are being met.

The following are recommendations for 2024:

- Monitor the site consistent with the schedule included in the REP for Year 2. Monitoring should evaluate erosion and slope stability during winter rain season - apply additional seed and install erosion controls as needed until the target vegetation is established and the erosion potential reduced;
- Continue weed abatement program including hand/mechanical removal and herbicide application of target non-native species with a focus on prickly ox-tongue, fennel and white topped hoary cress;
- Conduct regular maintenance and monitoring consistent with the REP and install additional container stock as needed to ensure the final success criteria defined in the REP are met;
- Continue seed collection efforts onsite and apply collected native seed to areas of poor germination or “holes” in the REP area to increase species diversity and habitat structure; and,
- Continue data collection, reporting program, and implementing adaptive management strategies as needed for Year 2.

APPENDIX A

Photo Plate



Appendix A - Photo Plate

Photo 1. Northerly view of initial REP planting in September 2022. Due to a heat wave that occurred immediately after planting, over half of the container plants died. As a result, additional plant material was acquired and replanting occurred in October 2023.



Photo 2. Compost and bark mulch were used in each planting area to help with plant establishment. View of the southern container plant area adjacent to a drainage dissipator.



Photo 3. Photo Point 1 looking north showing the site during a May 2023 monitoring visit. The slope has established excellent vegetation cover with native species applied via hydroseed. Container stock from initial planting in 2022 is marked with orange pin flags. Wildlife exclusion fence was removed and permanent barbed wire fence installed along property line.



Photo 4. View of site entrance looking north while crews installed replacement plants in October 2023. Several substitutions occurred including the use of California goldenrod shown here.



Photo 5. Photo Point 1 looking north after the replacement plants were installed. Blue pin flags identify new plants in 2023 and orange pin flags mark locations of plants installed in 2022.



Photo 6. Photo Point 2 showing establishing herbaceous cover from native hydroseed mix and container plants installed in the central part of the REP zone. The hillside is composed of native grasses (predominantly meadow barley and California brome) with container plants such as sycamore, coast live oak, blue elderberry, wild rose, mugwort, and hummingbird sage also present.



Photo 7. View of Photo Point 3 area looking northerly in between container planting areas showing establishing native grasses applied via hydroseed. Supplemental irrigation has aided in plant growth throughout the REP area.



Photo 8. Photo Point 3 looking southerly over REP container planting area showing established vegetation on slope with container plants visible with orange and blue pin flags.



Photo 9. A pulled back view of Photo Point 3 area looking southerly over the central REP planting zone. This area had an increase in prickly ox-tongue that was treated with an aster specific herbicide (Milestone) in 2023. Weeds were also removed by hand around container plantings during maintenance visits.



Photo 10. Photo Point 4 looking south showing seeded and planted material in the northern part of the REP area. Note the established grass cover from hydroseed mix and container plantings including hummingbird sage and coast live oak.



Photo 11. Another southerly view of the central planting area around Photo Point 4 showing established vegetation cover on the REP area.



Photo 12. Representative view of vegetation cover in the REP area in the vicinity of Photo Point 2. Native seed applied using hydroseed methods was providing over 80% areal cover of meadow barley and California brome with very little growth of non-native weeds.



Photo 13. Representative photo of a California bay tree (number 18) that was given a vigor rating of 1 during the monitoring surveys. Container plants were installed following methods described in the REP (i.e., each plant was mulched and numbered using an aluminum tag, and then GPS-ed).



Photo 14. Representative view of one of the many California blackberry container plants installed in the REP area that are establishing on the site.



Photo 15. Representative view of a one-year old coast live oak tree that has grown several feet in height since installation in August/September 2022.



Photo 16. Representative photo of a western sycamore planted in the REP area.