

Appendix J: Mitigation Monitoring and Reporting Program

**H Cycle Pittsburgh
Renewable Hydrogen Project**

**Appendix J
Mitigation Monitoring and Reporting
Program**

January 2024

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J.1 INTRODUCTION

As the lead agency under the California Environmental Quality Act (CEQA), the city of Pittsburg (City) is required to adopt a program for reporting or monitoring regarding the implementation of mitigation measures for the H Cycle Pittsburg Renewable Hydrogen Project (Project), if it is approved, to ensure that the adopted mitigation measures are implemented as defined in this Environmental Impact Report (EIR). This lead agency responsibility originates in Public Resources Code section 21081.6, subdivision (a) (Findings), and the State Guidelines for Implementing CEQA sections 15091, subdivision (d) (Findings) and 15097 (Mitigation Monitoring or Reporting).

J.2 MONITORING AUTHORITY

The purpose of a Mitigation Monitoring and Reporting Program (MMRP) is to ensure that measures adopted to mitigate or avoid significant impacts are implemented. An MMRP can be a working guide to facilitate not only the implementation of mitigation measures by HC (Contra Costa), LLC (Applicant), but also the monitoring, compliance, and reporting activities of the City and any monitors it may designate.

The City may delegate duties and responsibilities for monitoring to other environmental monitors or consultants as deemed necessary, and some monitoring responsibilities may be assumed by responsible agencies, such as the Bay Area Air Quality Management District. The City or its designee(s), however, would ensure that each person delegated any duties or responsibilities is qualified to monitor compliance.

Any mitigation measure study or plan that requires the approval of the City must allow adequate review time. Other agencies and jurisdictions may require additional review time. It is the responsibility of the Applicant to ensure that appropriate agency reviews and approvals are obtained.

The City or its designee would also ensure that any deviation from the procedures identified under the monitoring program is approved by the City. Any deviation and its correction shall be reported immediately to the City or its designee by the Applicant.

J.3 ENFORCEMENT RESPONSIBILITY

The City, as the lead agency, is responsible for enforcing the procedures adopted for monitoring.

J.4 MITIGATION COMPLIANCE RESPONSIBILITY

HC (Contra Costa), LLC as the Applicant is responsible for successfully implementing all the mitigation measures in the MMRP, and shall ensure that these requirements are met by all of its contractors and field personnel. Standards for successful mitigation are implicit in mitigation measures that include such requirements as obtaining permits or avoiding a specific impact entirely. Other mitigation measures include detailed success criteria. Additional mitigation success thresholds may be established by applicable agencies with jurisdiction through the permit process and through the review and approval of plans required for implementation of mitigation measures.

J.5 MITIGATION MONITORING AND REPORTING TABLE

The MMRP describes implementation and monitoring responsibilities, timing, implementation and reporting schedules, and implementation mechanisms or tools for each mitigation measure identified in the EIR, as described below. The table lists the following information, by column:

- **Mitigation Measure:** Provides the full text of the measure from the Final EIR.
- **Monitoring/Reporting Action:** Identifies the action to be taken by the Applicant.
- **Mitigation Timing:** Implementation of mitigation measures may occur before, during, or after construction or during operation, etc.
- **Responsible Entity:** Identifies the entities that will be responsible for directly implementing the mitigation measures, reporting, and monitoring.
- **Compliance Verification:** Identifies how compliance will be verified.

Table J-1: H Cycle Renewable Hydrogen Program Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
3.3 AIR QUALITY and GREENHOUSE GAS EMISSIONS				
Mitigation Measure AQ-O1a: To mitigate the potential for a significant impact from operational ROG, nitrogen oxides (NO _x) and PM ₁₀ emissions, BAAQMD-approved emissions abatement equipment will be installed.	Operation	Implement Operational Control Measures	City	Verify implementation and compliance with operations measures
<p>Mitigation Measure AQ-O1b: To mitigate the potential for GHG emissions, the following measures will be implemented:</p> <ul style="list-style-type: none"> • Project Feedstock Design Feature incorporating the avoidance of landfill emissions with feedstock selection. • The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). <p>The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.</p>	Operation	Implement Operational Control Measures	City	Verify implementation and compliance with operations measures
<p>Mitigation Measure AQ-C2: To mitigate the potential for GHG emissions during construction, the following measures will be implemented:</p> <ul style="list-style-type: none"> • Use zero-emission and hybrid-powered equipment to the greatest extent possible, particularly if emissions are occurring near sensitive receptors or located within a BAAQMD-designated Community Air Risk Evaluation (CARE) area or Assembly Bill 617 community. • Require all diesel-fueled off-road construction equipment be equipped with EPA Tier 4 Final compliant engines or better as a condition of contract. • Require all on-road heavy-duty trucks to be zero emissions or meet the most stringent emissions standard, such as model year (MY) 2024 to 2026, as a condition of contract. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 2 minutes (A 5-minute limit is required by the state airborne toxics control measure [Title 13, Sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site and 	Construction	Implement Basic Construction Measures and BMPs	City	Verify implementation and compliance with construction measures and BMPs

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MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
<p>develop an enforceable mechanism to monitor idling time to ensure compliance with this measure.</p> <ul style="list-style-type: none"> • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to no more than 2 minutes (A 5-minute limit is required by the state airborne toxics control measure [Title 13, Sections 2449(d)(3) and 2485 of the California Code of Regulations]). Provide clear signage that posts this requirement for workers at the entrances to the site and develop an enforceable mechanism to monitor idling time to ensure compliance with this measure. • Prohibit off-road diesel-powered equipment from being in the “on” position for more than 10 hours per day. • Use California Air Resources Board–approved renewable diesel fuel in off-road construction equipment and on-road trucks. • Require all construction equipment to be maintained and properly tuned in accordance with manufacturer’s specifications. Equipment should be checked by a certified mechanic and determined to be running in proper condition prior to operation. • Where grid power is available, prohibit portable diesel engines and provide electrical hook ups for electric construction tools, such as saws, drills, and compressors, and use electric tools whenever feasible. • Where grid power is not available, use alternative fuels, such as propane or solar electrical power, for generators at construction sites. • Encourage and provide carpools, shuttle vans, transit passes, and/or secure bicycle parking to construction workers and offer meal options on site or shuttles to nearby meal destinations for construction employees. • Reduce electricity use in the construction office by using LED bulbs, powering off computers every day, and replacing heating and cooling units with more efficient ones. • Minimize energy used during site preparation by deconstructing existing structures to the greatest extent feasible. • Recycle, divert or salvage nonhazardous construction and demolition debris, with a goal of recycling at least 15 percent more by weight than the diversion requirement in Title 24. 	Construction	Implement Basic Construction Measures and BMPs	City	Verify implementation and compliance with construction measures and BMPs

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MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
<ul style="list-style-type: none"> • Use locally sourced or recycled materials for construction materials (goal of at least 20 percent based on costs for building materials and based on volume for roadway, parking lot, sidewalk and curb materials). Wood products used should be certified through a sustainable forestry program. • When feasible, use low-carbon concrete, and/or minimize the amount of concrete used. When feasible and if more efficient or lower emitting, produce concrete on-site instead of transporting ready-mix. Develop a plan to efficiently use water for adequate dust control since substantial amounts of energy can be consumed during the pumping of water. • Develop a plan to efficiently use water for adequate dust control since substantial amounts of energy can be consumed during the pumping of water. • Include all requirements in applicable bid documents, purchase orders, and contracts, with successful contractors demonstrating the ability to supply the compliant on- or off-road construction equipment for use prior to any ground-disturbing and construction activities. 	Construction	Implement Basic Construction Measures and BMPs	City	Verify implementation and compliance with construction measures and BMPs
<p>Mitigation Measure AQ-O2: To mitigate the potential for GHG emissions during operations, the following measures will be implemented:</p> <ul style="list-style-type: none"> • Project Feedstock Design Feature incorporating the avoidance of landfill emissions with feedstock selection. • The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). • The project will not result in any wasteful, inefficient, or unnecessary energy use as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. 	Operations	Implement Basic Operations Measures and BMPs	City	Verify implementation and compliance with operations measures and BMPs
3.4 BIOLOGICAL RESOURCES				
<p>Mitigation Measure BIO-1a: General Work Site Best Management Practices. The following measures shall be included on all plans and employed by HC (Contra Costa), LLC and its contractors to avoid and minimize impacts to water quality and other beneficial characteristics of wetlands at the project site:</p>	Design	Include Measures on Plan	City	Verify measures included on plans

Table J-1: H Cycle Renewable Hydrogen Program Mitigation Monitoring and Reporting Program

MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
<ul style="list-style-type: none"> • No debris, soil, silt, sand, cement, concrete or washings thereof, or other construction-related materials or wastes, oil or petroleum products, or other organic or earthen material shall be allowed to enter into or be placed where it may be washed by rainfall or runoff into marshes or open water/ditches adjacent to the work areas. • All personnel and their equipment shall be required to stay within the designated construction area to perform job-related tasks and shall not be allowed to enter wetlands, drainages and habitat of listed species. • Pets shall not be allowed in or near the construction area. • Firearms shall not be allowed in or near the construction area, except for armed HC (Contra Costa), LLC security officers who may periodically patrol work sites. No intentional killing or injury of wildlife shall be permitted. • The construction site shall be maintained in a clean condition. All trash (e.g., food scraps, cans, bottles, containers, wrappers, cigarette butts and other discarded items) shall be placed in closed containers and properly disposed off-Site. <p>After construction is completed, final cleanup shall include removal of all stakes, temporary fencing, flagging and other refuse generated by construction. Vegetation shall not be removed or disturbed in the cleanup process.</p>	During construction	Implement General Work Site Best Management Practices	City	Verify implementation and compliance
<p>Mitigation Measure BIO-1b: Spill and Accidental Discharge Prevention. The following measures shall be included on all plans and employed by HC (Contra Costa), LLC and its contractors. HC (Contra Costa), LLC and its contractors shall be responsible for structure operations in a manner that minimizes the risk of spills or the accidental discharge of fuels or hazardous materials. HC (Contra Costa), LLC and its contractors shall, at a minimum, ensure that:</p> <ul style="list-style-type: none"> • All employees handling fuels and other hazardous materials are properly trained. • All equipment is in good operating order and inspected regularly. Hazardous materials, including chemicals, fuels and lubricating oils, shall not be stored within 200 feet of a wetland or water body. This applies to storage of these materials and does not apply to normal operation or use of equipment in these areas. 	Design	Include measures on plans	City	Verify measure included on plans
	Construction	Implement Spill and Accidental Discharge Prevention Measures	City	Verify implementation of measures

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<ul style="list-style-type: none"> If refueling is needed on-site, it will occur at least 100 feet from a surface water feature, and in a designated refueling area with secondary containment/plastic sheeting and a spill containment kit. 				
<p>Mitigation Measure BIO-1c: Emergency Spill and Containment Plan. The following measures shall be included on all plans and employed by HC (Contra Costa), LLC and its contractors:</p> <ul style="list-style-type: none"> In the event of an accidental spill, the Facility Oil Spill Contingency Plan shall be implemented. Site-specific provisions shall be listed on the Safe Work Permit and included within the job plan maintained on-Site. At a minimum, the Applicant and its contractors shall: <ul style="list-style-type: none"> Ensure that each construction crew (including clean-up crews) has sufficient supplies of absorbent and barrier materials on-Site to allow the rapid containment and recovery of spilled materials, and that each construction crew knows the procedure for reporting spills. Ensure that each construction crew has sufficient tools and material on Site to stop leaks. Know the contact names and telephone numbers for all HC (Contra Costa), LLC contacts and local, state and federal agencies (including, if necessary, the U.S. Coast Guard and the National Response Center) that might need to be notified in the event of a spill. Follow the requirements of those agencies in cleaning up the spill, excavating and disposing soils or other materials contaminated by a spill, and collecting and disposing waste generated during spill cleanup. 	Design	Include measures on plans; Emergency Spill and Containment Plan	City	Verify measure included on plans. Review and approve Safe Work Permit; Review and approve Emergency Spill and Containment Plan
	Construction	Implement plan	City	Verify plan implementation and compliance
<p>Mitigation Measure BIO-1d: Stormwater Pollution Prevention Plan (SWPPP). The proposed Project shall adhere to and implement the requirements of the respective existing SWPPP for Corteva during project operations. Applicable measures for project construction shall be incorporated into the construction SWPPP plans by a qualified specialist and implemented prior to construction.</p>	Design	SWPPP	SFRWQB	Review and approve SWPPP
	Design	Include applicable measures on construction plans	City	Verify measures included on construction plans
	Construction	Implement measures	City; SFRWQB	Verify implementation and compliance

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<p>Mitigation Measure BIO-1e: Demarcation of Limits of Work. Applicant and its contractors shall clearly demarcate the limits of work in the field. All project-related activity shall be confined to the designated work areas; no entry into adjacent areas shall be allowed by project personnel. Upon project completion, material used to mark the work boundary shall be removed.</p>	Construction	Implement work restrictions	City	Verify implementation and compliance
<p>Mitigation Measure BIO-1f: Weed Spread Prevention. Applicant and its contractors shall implement measures to ensure that boots, clothing, vehicles and equipment are free of soils and plant parts prior to entering work areas.</p>	Construction	Implement work restrictions	City	Verify implementation and compliance
<p>Mitigation Measure BIO-1g: . Preconstruction Focused Soft-Bird’s Beak Surveys. Focused surveys for soft-bird’s beak shall be conducted by a qualified biologist each year during the appropriate blooming period (June 1 through September 30) prior to construction to confirm its absence. Locations of rare plants in proposed construction areas will be recorded using a GPS unit and flagged for avoidance or project proponent will consult with the appropriate agency regarding the potential to relocate the plants. When construction is occurring in the area of the flagged plants, a qualified biologist shall monitor construction activities occurring in the vicinity of the flagged plants to ensure that no direct or indirect impacts occur.</p>	Construction	Preconstruction surveys to minimize habitat disturbance	City	Verify implementation and compliance
<p>Mitigation Measure BIO-1h: Preconstruction Nesting Bird Surveys. No more than 5 days prior to construction during the nesting bird season (February 1 through September 15), a qualified biologist shall conduct a survey for nesting birds. If work within an area lapses for more than 14 days during the nesting season, the survey shall be repeated. The survey shall encompass all work areas and those areas within a buffer of 250 feet for passerines, 500 feet for small raptors, and 1,000 feet for large raptors. Where accessible, the location of active nests will be recorded using a handheld global-positioning system unit. Should an active nest be discovered, the area of the nest and an appropriate buffer area will be cordoned off during construction activities that could cause disturbance of the nest. The qualified biologist conducting the nesting surveys should prepare a report that provides details about the nesting outcome and the removal of buffers. This report should be that buffers are removed at the end of the proposed project, at which time the biologist will confirm that the nests were not disturbed.</p>	Construction	Preconstruction surveys in designated work areas	City	Verify implementation of measure

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<p>Measure BIO-1i: California Ridgway’s Rail and California Black Rail Surveys. Prior to construction occurring during the rail nesting season (February 1 through August 31) within 700 feet of suitable rail habitat, surveys shall be conducted for California Ridgway’s rail and California black rail in accordance with the USFWS Survey protocol for California Ridgway’s rail. Surveys should be initiated between January 15 and February 1. For each survey station, four surveys are to be conducted. Surveys should be spaced at least two weeks apart and should cover the time period from the date of the first survey through the end of March or mid-April. If California Ridgway’s or California black rails are detected during the survey, no work within 700 feet of the rail calling centers (identified via compass bearing and distance estimate during surveys) shall occur between February 1 and August 31, unless otherwise approved by USFWS and CDFW.</p>	Construction	Preconstruction surveys in designated work areas	City	Verify implementation of measure
3.5 CULTURAL AND TRIBAL RESOURCES				
<p>Mitigation Measure CR-C1a: Prepare and Implement an Inadvertent Discovery Plan. The following measures shall be included on all plans and employed by HC (Contra Costa), LLC (Applicant) and its contractors to avoid and minimize impacts to historical and archaeological resources at the project site:</p> <ul style="list-style-type: none"> • A plan for the inadvertent discovery of historic or cultural resources, or human remains will be prepared. If unanticipated cultural resources (historic or prehistoric artifacts, concentrations of shell, burnt or unburnt bone, stone features, etc.) are uncovered during grading or excavation activities, work immediately within 50 feet of the discovery of the find shall be halted, the City of Pittsburg Planning Division shall be notified, and a professional archaeologist that meets the Secretary of the Interior’s Standards and Guidelines for Professional Qualifications in archaeology and/or history shall be retained to determine the significance of the discovery. A mitigation plan shall include such measures as avoidance, preservation in place, excavation, documentation, curation, data recovery, or other appropriate measures. The City shall consider mitigation recommendations presented in the mitigation plan. The Applicant shall be required to implement any mitigation necessary for the protection of cultural resources before ground-disturbing activities may resume. 	Prior to any ground disturbance and throughout construction	Upon find of prehistoric or historic-period archaeological resources	City; Tribal representative, if required; CSLC Staff Attorney	Confirm suspension of work upon find and resource determination; Approve avoidance or other applicable measures.

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MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
<p>Mitigation Measure CR-C1b: Provide Preconstruction Worker Awareness Training. The following measure shall be included on all plans and employed by the Applicant and its contractors to avoid and minimize impacts to historical and archaeological resources at the project site:</p> <ul style="list-style-type: none"> As part of construction personnel training, the City of Pittsburg shall ensure that all construction personnel receive training that includes: 1) information on the possibility of encountering human or animal remains during construction; 2) the types of cultural resources are likely to be seen; and 3) proper procedures in the event of any inadvertent discovery. Worker training shall be prepared and presented by a qualified archaeologist 	Prior to any ground disturbance and throughout construction	Construction worker awareness training on inadvertent discovery	City; Tribal representative, if required; CSLC Staff Attorney	Confirm suspension of work upon find and resource determination; Approve avoidance or other applicable measures.
<p>Mitigation Measure CR-C2: Excavation/Grading Halt upon Human Burial or Bone Discovery. The following measures shall be included on all plans and employed by Applicant and its contractors to avoid and minimize impacts to historical and archaeological resources at the project site:</p> <p>In the event of the discovery of a burial, human bone, or suspected human bone: 1) all excavation and grading in the vicinity of the find shall be halted immediately; 2) the area of the find shall be cordoned off; and 3) the Applicant shall immediately notify the Contra Costa County Coroner of the find and comply with provisions of PRC § 5097 with respect to Native American involvement, burial treatment, and re-burial, if necessary. If the coroner’s office determines that the remains are Native American and not under its purview, it shall contact the Native American Heritage Commission as mandated by PRC § 5097.</p>	Construction	Designate work areas	City	Verify implementation of measure
3.6 ENERGY				
<p>Mitigation Measure ENG-C1a: Provide incentives for construction workers to use electric vehicles, transit, bicycles, or carpool. As examples, construction workers could be provided preferential parking, stipends, and assistance to take advantage of the numerous federal and state electric vehicle incentives. Bicyclists can be provided electric bike subsidies through California’s CalBike Program. Carpoolers can be provided reward programs (such as prize drawings), and employees can be encouraged to form carpools through rideshare matching and through other assistance.</p>	Construction	Provide evidence of compliance	City	Verify implementation of mitigation measure

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MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
Mitigation Measure ENG-C1b: Provide incentives for zero emission delivery trucks to use the facility. Since California requires 100 percent zero emission truck sales beginning in 2036, most major truck manufacturers already have such vehicles on the market today. Incentives could involve preferences in vendor selection, preferred scheduling, free or low-cost recharging on site, and purchase incentives.	Construction	Provide evidence of compliance	City	Verify implementation of mitigation measure
Mitigation Measure ENG-C1c: Provide incentives for the construction contractor to use electric powered equipment on site.	Construction	Provide evidence of compliance	City	Verify implementation of mitigation measure
Mitigation Measure ENG-C1d: Provide incentives for the construction contractor to minimize and reuse waste generated on site.	Construction	Provide evidence of compliance	City	Verify implementation of mitigation measure
Mitigation Measure ENG-O1a: Require the Applicant to install EV charging stations.	Design	Include on construction plans	City	Verify included on construction plans
Mitigation Measure ENG-O1b: Require 10 percent of on-road commercial trucks entering the facility to be zero emission by 2030 and 100 percent to be zero emission by 2045.	Operations	Implement BMPs	City	Verify implementation of mitigation measure
Mitigation Measure ENG-O1c: Require all buildings to comply with the adopted California Green Building Standards Code.	Operations	Implement BMPs	City	Verify implementation of mitigation measure
Mitigation Measure ENG-O1d: Require the Applicant to prioritize parking for zero emission vehicles.	Operations	Implement BMPs	City	Verify implementation of mitigation measure
Mitigation Measure ENG-O1e: Provide incentives for facility workers and visitors to use electric vehicles, bicycles, or transit, or to walk or carpool to the site.	Operations	Implement BMPs	City	Verify implementation of mitigation measure
Mitigation Measure ENG-O1f: Require the Applicant to participate in one or more of the numerous zero emission truck purchase programs if funding is available. For example, CARB provides funding assistance, planning resources, and other support to entities such as the Applicant to purchase zero-emission vehicles.	Operations	Implement BMPs	City	Verify implementation of mitigation measure

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MITIGATION MEASURE	TIMING	MONITORING/ REPORTING ACTION	RESPONSIBLE ENTITY	COMPLIANCE VERIFICATION
Mitigation Measure ENG-O1g: Require 25 percent of all on-site forklifts, yard trucks, and company vehicles other than off-road equipment to be zero emission by 2030 and 100 percent to be zero emission by 2045.	Operations	Implement BMPs	City	Verify implementation of mitigation measure
3.7 GEOLOGY AND SOILS				
Mitigation Measure GEO-1: Compliance with California Building Code requirements	Prior to issuance of permit to construct	Provide evidence of compliance	City	Verify implementation of mitigation measure