

**MITIGATION AND MONITORING PROGRAM**  
**Fulton Road Sewer Lift Station Project**

Environmental Protection Actions (EPAs) and Mitigation Measures (MM)	Implementation Procedure	Monitoring Responsibility	Monitoring / Reporting Action & Schedule	Monitoring Compliance Record (Name/Date)
<p><b>EPA-1: Implement Geotechnical Design Recommendations</b></p> <p>As part of the Project design process, the City would engage a California-registered Geotechnical Engineer to conduct a design-level geotechnical study for the Project. The City will design the Project to comply with the site-specific recommendations made in the Project's geotechnical report. This will include design in accordance with the seismic and foundation design criteria, determining appropriate method of tunneling under Santa Rosa Creek, as well as site preparation and grading recommendations included in the report. The geotechnical recommendations will be incorporated into the final plans and specifications for the Project, and will be implemented during construction.</p>	Incorporate recommendations into final plans and specifications.	City of Santa Rosa	Verify all geotechnical study design recommendations are incorporated into 90% plan set.	
<p><b>EPA-2: Implement Air Quality Control Measures during Construction</b></p> <p>To limit dust, criteria pollutants, and precursor emissions associated with the construction activity, the following Bay Area Air Quality Management District (BAAQMD) recommended Basic Construction Measures will be included in construction contract specifications and required during implementation of the project:</p> <ul style="list-style-type: none"> <li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas and unpaved access roads) shall be watered two times per day;</li> <li>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered or shall have at least two feet of freeboard;</li> <li>• All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping shall be prohibited;</li> <li>• All vehicle speeds on unpaved areas shall be limited to 15 miles per hour;</li> <li>• All paving shall be completed as soon as possible after trenching work is finished;</li> <li>• Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points;</li> <li>• All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation;</li> <li>• A publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.</li> </ul>	Incorporate into final plans and specifications.	City of Santa Rosa	Verify in 90% specifications. Check daily jobsite compliance as necessary.	

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<p><b>EPA-3: Secure Authority to Construct/Permit to Operate</b></p> <p>Prior to any construction activity requiring the installation of an emergency backup diesel generator, which is a stationary source of air pollutants, the City will submit the required Authority to Construct (A/C) pre-construction permit application to the BAAQMD. The City will comply with any and all BAAQMD-required permit conditions. As part of the process, the City will prepare a BAAQMD's Health Risk Screening Analysis that demonstrates the generator would result in a health risk that is less than the BAAQMD's CEQA Thresholds. Prior to first use of the installed generator, the City will submit a Permit to Operate (P/O) application to the BAAQMD. The BAAQMD will not approve the P/O if the analysis indicates health risk over the threshold. Generator operations shall comply with BAAQMD's P/O conditions.</p>	<p>Submit A/C pre-construction permit application to BAAQMD.</p> <p>Submit a P/O application to the BAAQMD.</p>	<p>City of Santa Rosa</p>	<p>Verify submittal of A/C, prior to start of construction.</p> <p>Verify P/O application approval prior to operation of the generator.</p>	
<p><b>EPA-3: Implement Climate Action Plan Measures</b></p> <p>To ensure that the project is consistent with the Santa Rosa Climate Action Plan, the following measures shall be incorporated into the project design and/or be implemented during construction.</p> <ul style="list-style-type: none"> <li>Construction vehicle idling times shall be minimized by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes or less (as required by the California airborne toxics control measure Title 13, Section 2485 of CCR). Clear signage shall be provided to remind contractors of idling restrictions.</li> <li>Construction equipment shall be maintained in accordance with manufacturer's specifications.</li> <li>The contractor shall be required to implement one of the following measures, as feasible and appropriate to the construction project: <ul style="list-style-type: none"> <li>Substitute electrified equipment for diesel- and gasoline-powered equipment where practical.</li> <li>Use alternative fuels for construction equipment onsite, where feasible, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel.</li> <li>Avoid the use of on-site generators by connecting to grid electricity or utilizing solar-powered equipment.</li> </ul> </li> </ul>	<p>Incorporate into final plans and specifications.</p>	<p>City of Santa Rosa</p>	<p>Verify in 90% specifications.</p> <p>Check daily jobsite compliance as necessary.</p>	
<p><b>BIO-1a: Avoid Loss of Listed or CNPS List 1B Plants and their Habitats</b></p> <p>The City shall avoid loss of state and federally listed or proposed plant species, state candidates for listing, CNPS List 1B species, and occupied or critical habitat for these species, to the extent feasible. Where avoidance of individuals or habitat is infeasible, the City shall compensate for loss as required by the U.S. Fish and Wildlife Service and/or CDFW.</p>	<p>Conduct reconnaissance-level surveys.</p> <p>Conduct Protocol surveys and implement applicable</p>	<p>City of Santa Rosa</p>	<p>Review results of reconnaissance-level surveys, prior to construction, and determine next steps.</p> <p>If necessary, verify protocol surveys were</p>	

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<p>For ground disturbance within vegetated areas (excluding landscape and ruderal areas), reconnaissance-level surveys shall be performed by a qualified botanist or biologist to determine whether the area affected may contain suitable habitat. If habitat for listed or CNPS List 1B plants is not identified during the surveys, then no further mitigation for impacts to target species are necessary under this measure. If the area does contain potential suitable habitat, protocol-level surveys to determine presence or absence of target species shall be conducted prior to construction wherever habitats for these species would be impacted, unless the City assumes presence of the species and implements compensatory measures.</p> <p>The following measures are examples of those that would be required by the U.S. Fish and Wildlife Service and/or CDFW.</p> <p>Listed or List 1B plants within the Project footprint may need to be transplanted to a mitigation site approved by the California Department of Fish and Wildlife and U.S. Fish and Wildlife Service. Seed from plants unavoidably impacted may need to be collected and preserved for planting on an approved mitigation site.</p> <p>All staging areas may need to be located outside listed or List 1B plant habitat.</p>	measures, if necessary.		<p>conducted and review results, prior to start of construction, and determine next steps.</p> <p>If necessary, implement avoidance measures prior to construction at lift station site.</p>	
<p><b>BIO-1b: Avoid Sensitive Plant Species</b></p> <p>The City shall avoid loss of individuals of a CNPS List 2, 3, or 4 (sensitive) plant species if impacts exceed 10 percent of the known occurrences within Sonoma County. A qualified botanist or biologist shall evaluate proposed sites to determine the potential for CNPS List 2, 3, or 4 plants. If the botanist or biologist determines that the site could support special-status plant species, then surveys for sensitive plant species shall be conducted by a qualified botanist during the bloom period. If special-status plants are identified within the construction area, the City shall attempt to avoid loss by adjusting construction boundaries to avoid sensitive plants.</p>	<p>Evaluate potential of site for CNPS list 2, 3, or 4 plant species.</p> <p>Conduct surveys, if necessary.</p> <p>Adjust construction boundaries, if necessary.</p>	City of Santa Rosa	<p>Review evaluation results for potential for CNPS list 2, 3, or 4 plant species, and determine next steps.</p> <p>If necessary, review survey results prior to construction, and determine next steps.</p> <p>If necessary, verify construction boundary avoids sensitive plants prior to construction at lift station site.</p>	
<p><b>BIO-2: Protect Western Pond Turtle</b></p> <p>The City shall ensure that preconstruction surveys for the western pond turtle are conducted by a qualified biologist at the new lift station site. If western pond turtles are found during preconstruction surveys, individuals shall be captured by a qualified biologist and relocated to suitable areas. If preconstruction surveys identify active nests, a qualified biologist shall establish a no-disturbance buffer zone around the nest using temporary orange exclusion</p>	<p>Conduct preconstruction surveys.</p> <p>Relocate individuals found and establish a no-disturbance buffer</p>	City of Santa Rosa	<p>Review results of preconstruction surveys prior to start of construction, and determine next steps.</p> <p>If necessary, verify that individuals were</p>	

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fencing. The radius of the buffer zone and the duration of the exclusion shall be determined in consultation with CDFW. The buffer zone and fencing shall remain in place until the young have left the nest, as determined by the biologist.	zone around active nests.		relocated and no-disturbance buffers are installed around active nests, prior to construction at lift station site.	
<p><b>BIO-3: Protect American Badger</b></p> <p>The City shall ensure that preconstruction surveys for the American badger nests are conducted by a qualified biologist at the new lift station site. If badger nests are found during preconstruction surveys, nests shall be blocked and individuals given an opportunity to find or make a new nest.</p>	<p>Conduct preconstruction surveys.</p> <p>Block nests and give individuals an opportunity to find or make a new nest.</p>	City of Santa Rosa	<p>Review results of preconstruction surveys and determine next steps, prior to start of construction.</p> <p>If necessary, verify that nests were blocked and individuals were given an opportunity to find a new nest, prior to construction at lift station site.</p>	
<p><b>BIO-4: Protect California Tiger Salamander</b></p> <p>The City of Santa Rosa shall avoid loss of habitat or individuals of CTS, to the extent feasible. Where avoidance of individuals or habitat is infeasible, the City shall compensate for loss as required by the USFWS and/or CDFW. Before ground disturbance within areas of potential habitat of the listed species, reconnaissance-level surveys shall be performed to determine whether the area affected may contain potential habitat. If the area does contain potential habitat, the City shall implement compensatory measures sufficient to ensure that the Project does not substantially reduce the number or restrict the range of the population of CTS.</p> <p>The following measures are examples of those that would be required by the USFWS and/or CDFW.</p> <ul style="list-style-type: none"> <li>Mitigation ratios for impacts to CTS habitat shall be as required by the USFWS and/or CDFW. A conservation easement shall be placed on the mitigation site to preserve the site in perpetuity as wildlife habitat. A long-term management plan shall be developed for the mitigation site to be approved by the USFWS.</li> <li>Minimization measures contained in Section 5.2 (Minimization Measures) of the Santa Rosa Plain Conservation Strategy (USFWS 2005) or any subsequent guidance adopted by the USFWS shall be implemented during work within areas where California tiger salamanders may occur.</li> </ul>	<p>Conduct reconnaissance-level surveys.</p> <p>Implement applicable measures, if necessary.</p>	City of Santa Rosa	<p>Review results of reconnaissance-level survey and determine next steps, prior to start of construction.</p> <p>If necessary, verify applicable measures have been implemented prior to start of construction.</p>	

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<ul style="list-style-type: none"> <li>Initial ground disturbing construction activities in habitat shall be limited to the dry season (June through October) when salamanders are not moving between terrestrial habitat and aquatic breeding habitat.</li> </ul>				
<p><b>BIO-5: Prevent Disturbance to Nesting Birds</b></p> <p>The City shall implement the following measures to prevent impacts to nesting birds:</p> <ul style="list-style-type: none"> <li>Grading or removal of vegetation shall be conducted outside the nesting season, which occurs between approximately February 1 and August 31. (No survey is required for work conducted outside this period)</li> <li>If grading or vegetation removal between August 31 and February 1 is infeasible and work must occur within the breeding season, a pre-construction nesting bird (both passerine and raptor) survey of the landscaped areas and trees shall be performed by a qualified biologist within 7 days of ground breaking. If no nesting birds are observed, no further action is required and work shall occur within one week of the survey to prevent "take" of individual birds that could begin nesting after the survey.</li> <li>If bird nests (either passerine and/or raptor) are observed during the pre-construction survey, a disturbance-free buffer zone shall be established around the nest tree(s) until the young have fledged, as determined by a qualified biologist.</li> <li>The radius of the required buffer zone can vary depending on the species, (i.e., 75 to 100 feet for passerines and 200 to 300 feet for raptors), with the dimensions of any required buffer zones to be determined by a qualified biologist in consultation with California Department of Fish and Wildlife (CDFW).</li> <li>To delineate the buffer zone around a nesting tree, orange construction fencing shall be placed at the specified radius from the base of the tree within which no machinery or workers shall intrude.</li> <li>After the fencing is in place there will be no restrictions on grading or construction activities outside the prescribed buffer zones.</li> </ul>	<p>Conduct preconstruction nesting surveys if grading or vegetation removal occurs during nesting season.</p> <p>Implement recommended protection measures as necessary.</p>	<p>City of Santa Rosa</p>	<p>Review result of preconstruction nesting surveys and determine next steps prior to start of construction, if necessary.</p> <p>If needed, verify disturbance buffers and fencing requirements are installed, prior to start of construction.</p> <p>Monitor fencing during construction.</p>	
<p><b>BIO-6: Prevent Disturbance of Roosting Bats</b></p> <p>Prior to construction, the City shall have a Bat Habitat Assessment conducted for trees and structures to be trimmed or removed as part of the Project. The Habitat Assessment shall be completed by a qualified biologist (e.g., a biologist holding a California Department of Fish and Wildlife collection permit and a Memorandum of Understanding with the California Department of Fish and Wildlife allowing the biologist to handle and collect bats). The Habitat Assessment shall evaluate the trees for suitable entry points and roost features, and shall provide focused daytime surveys for day-roosting bats. If a special-status bat species is found, or if suspected day roosts for special-status bats are identified, then the Habitat</p>	<p>Conduct Bat Habitat Assessment.</p> <p>Implement suitable performance measures as necessary.</p>	<p>City of Santa Rosa</p>	<p>Review results of Bat Habitat Assessment and determine next steps, prior to construction.</p> <p>If needed, implement avoidance measures, prior to start of construction.</p>	

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<p>Assessment shall identify suitable performance measures for avoiding impacts to roosts, which may include, but would not be limited to:</p> <ul style="list-style-type: none"> <li>• Consultation with the California Department of Fish and Wildlife to determine appropriate measures for protecting bats with young if present, and for implementing measures to exclude non-breeding bat colonies during construction process.</li> <li>• Phased removal of trees where selected limbs and branches not containing cavities are removed using chainsaws on the first day, with the remainder of the tree removed using chainsaws or other equipment on the second day.</li> </ul> <p>Based on the daytime habitat assessment, and if culvert and site conditions warrant further surveys, additional surveys may be required, e.g. a night emergence survey, or radio-controlled remote vehicle with infrared camera system to determine presence of absence of bats further inside the culverts. If no bats are present during the day, the culverts may be partially blocked with appropriate mesh or netting to prevent subsequent occupation. If bats are present during the day, additional exclusion and eviction efforts would be required based on specific recommendations of a qualified bat biologist in consultation with the California Department of Fish and Wildlife.</p>				
<p><b>BIO-6: Compensate for Loss of Wetlands and Waters</b></p> <p>The City shall avoid fill of seasonal wetlands and waters, to the extent feasible. If fill cannot be avoided, the City shall compensate for the loss of seasonal wetland habitat through the purchase of wetland credits at a ratio of 1:1, in an approved mitigation bank within the Santa Rosa Plain so that there is no net loss in wetlands. Required permits from the U.S. Army Corp of Engineers, the North Coast Regional Water Quality Control Board, the California Department of Fish and Game, and the Sonoma County Water Agency shall be received prior to the start of any on-site construction activity. The City shall ensure any additional measures outlined in the permits are implemented.</p>	<p>Conduct a site visit to update the Delineation of Waters prepared in support of the Initial Study (Valerius 2018).</p> <p>If present, avoid or mitigate jurisdictional wetlands.</p>	<p>City of Santa Rosa</p>	<p>If jurisdictional wetlands cannot be avoided, wetland credits shall be purchased prior to start of construction.</p>	
<p><b>CR-1: Manage Potential Historical Resource</b></p> <p>The City shall ensure that a qualified Architectural Historian or Historical Architect evaluate the existing West College Lift Station just prior to demolition or abandonment of the building. This evaluation cannot be conducted adequately at the time of this IS/MND, because the lift station is not planned for demolition or abandonment for another 10 to 15 years. If the evaluation finds that the West College Lift Station qualifies as a historical resource as defined in CEQA Guidelines section 15064.5(a), then the City shall not demolish any historical part of the facility, but instead abandon the facility in place. Abandonment of the facility shall be done in accordance with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings.</p>	<p>Evaluate West College Lift Station.</p>	<p>City of Santa Rosa</p>	<p>Review results of evaluation of West College Lift Station prior to demolition, and determine if demolition is allowed.</p>	

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<p><b>CR-2: Protect Archaeological Resources</b></p> <p>If potential archaeological resources are uncovered, the City shall halt work and workers shall avoid altering the materials and their context. Project personnel shall not collect cultural materials. Prehistoric materials might include obsidian and/or chert flaked-stone tools such as projectile points, knives, or scraping implements; the debris from making, sharpening, and using them ("debitage"); culturally darkened soil containing shell, dietary bone, heat-altered rock, and carbonized plant material ("midden"); or stone milling equipment such as mortars, pestles, handstones, or milling slabs. A qualified professional archaeologist shall evaluate the find and provide appropriate recommendations. If the archaeologist determines that the find potentially qualifies as a historic resource or unique archaeological resource for purposes of CEQA (per CEQA Guidelines Section 15064.5), all work must remain stopped in the immediate vicinity to allow the archaeologist to evaluate any materials and recommend appropriate treatment. A Native American monitor shall be present for the investigation, if the local Native American tribe requests. Avoidance of impacts to the resource are preferable. In considering any suggested measures proposed by the consulting archaeologist in order to mitigate impacts to historical resources or unique archaeological resources, the City shall determine whether avoidance is feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures as recommended by the archaeologist (e.g., data recovery) shall be instituted. Work may proceed on other parts of the Project while mitigation for historic resources or unique archaeological resources is being carried out.</p>	Incorporate into specifications.	City of Santa Rosa	Verify requirements are in 90% specifications.	
<p><b>CR-3: Protect Paleontological Resources during Construction Activities</b></p> <p>In the event that fossils are encountered during construction (i.e., bones, teeth, or unusually abundant and well-preserved invertebrates or plants), construction activities shall be diverted away from the discovery within 50 feet of the find, and a professional paleontologist shall be notified to document the discovery as needed, to evaluate the potential resource, and to assess the nature and importance of the find. Based on the scientific value or uniqueness of the find, the paleontologist may record the find and allow work to continue, or recommend salvage and recovery of the material, if it is determined that the find cannot be avoided. The paleontologist shall make recommendations for any necessary treatment that is consistent with currently accepted scientific practices. Any fossils collected from the area shall then be deposited in an accredited and permanent scientific institution where they will be properly curated and preserved.</p>	Incorporate into specifications.	City of Santa Rosa	Verify requirements are in 90% specifications.	
<p><b>CR-4: Protection of Human Remains</b></p> <p>If human remains, associated grave goods, or items of cultural patrimony are encountered during construction, the City shall halt work in the vicinity of the find and notify the County Coroner immediately. The City shall follow the procedures in Public Resources Code §</p>	Incorporate into specifications.	City of Santa Rosa	Verify requirements are in 90% specifications.	

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<p>5097.9 and Health and Safety Code § 7050.5. If the human remains are determined to be of Native American origin, the Coroner shall notify the Native American Heritage Commission within 24 hours of the determination. The Native American Heritage Commission shall then notify the Most Likely Descendant (MLD), who has 48 hours to make recommendations to the landowner for the disposition of the remains. A qualified archaeologist, the City and the MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of any human remains and associated or unassociated funerary objects. The agreement would take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, and final disposition of the human remains and associated or unassociated funerary objects.</p>			<p>Conduct notification if necessary.</p>	
<p><b>HAZ-1: Assess and Manage Hazardous Wastes</b></p> <p>Prior to building demolition, the City shall ensure that a registered environmental assessor or a professional engineer perform a hazardous building materials survey of the West College Lift Station. The survey shall be designed to identify any asbestos-containing materials, lead-based paint, electrical equipment containing Polychlorinated Biphenyls (PCBs), fluorescent lights containing mercury, or fluorescent light ballasts containing PCBs or di(2-ethylhexyl)phthalate (DEHP). If any friable asbestos-containing materials, lead-containing materials, or other hazardous components of building materials are identified, adequate abatement practices, such as containment and/or removal, in accordance with applicable regulations for the handling and removal of these materials, shall be implemented prior to demolition. Any PCB-containing equipment or fluorescent lights containing mercury vapors shall also be removed and disposed of in accordance with applicable regulations.</p> <p>A written plan or notification of intent to demolish buildings shall be provided to the BAAQMD at least ten working days prior to commencement of demolition, even if no ACMs are present. If asbestos is detected, the demolition and removal of asbestos-containing building materials shall be subject to applicable California Occupational Safety and Health Administration (Cal/OSHA) and BAAQMD regulations (Regulation 11, Rule 2). If lead-based paint is identified, then federal and State construction worker health and safety regulations shall be followed during demolition activities, including Title 17 of the CCR, Sections 35001 through 36000. If loose or peeling lead-based paint is identified, it shall be removed by a qualified lead abatement contractor and disposed of in accordance with existing hazardous waste regulations.</p>	<p>Conduct a pre-demolition hazardous building materials survey.</p> <p>Provide a written plan or notification of intent to BAAQMD, if necessary.</p>	<p>City of Santa Rosa</p>	<p>Review pre-demolition survey prior to building demolition.</p> <p>If necessary, send written plan or notification of intent to BAAQMD.</p>	
<p><b>HWQ-1: Manage Construction Storm Water</b></p> <p>If construction dewatering is required, the City and its contractor shall evaluate reasonable options for dewatering management that would avoid discharging to a local surface water or storm drain. The following management options shall be considered:</p> <ul style="list-style-type: none"> <li>• Reuse the water on-site for dust control, compaction, or irrigation.</li> <li>• Retain the water on-site in a grassy or porous area to allow infiltration/evaporation.</li> </ul>	<p>Prepare SWPPP and permit registration documents prior to construction.</p> <p>Retain a Qualified Storm Water</p>	<p>City of Santa Rosa</p>	<p>Verify requirements are in 90% specifications.</p> <p>Confirm that SWPPP meets State Board requirements and is</p>	

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<ul style="list-style-type: none"> <li>Discharge (by permit) to a sanitary sewer.</li> </ul> <p>If discharging to the sanitary sewer, the City shall comply with a one-time discharge permit requiring, as necessary, measures for characterizing the discharge and ensuring filtering methods and monitoring to verify that the discharge is compliant with the City's local wastewater discharge requirements.</p> <p>If discharging to a local surface water or storm drain, the City shall obtain coverage under Order No. R1-2009-0045, Waste Discharge Requirements for Low Threat Discharges to Surface Waters in the North Coast Region. The City shall submit permit registration documents to the North Coast Regional Water Quality Control Board, including development of a Best Management Practices/Pollution Prevention Plan to characterize the discharge and to identify specific measures to control the discharge, such as sediment controls to ensure that excessive sediment is not discharged, and flow controls to prevent erosion and flooding downstream of the discharge. The City shall ensure that the contractor implements the Best Management Practices/Pollution Prevention Plan during construction dewatering activities, including visual inspections to ensure overall compliance.</p>	Pollution Prevention Plan Practitioner to oversee SWPPP implementation.		implemented during construction.	
<p><b>NOI-1: Manage Noise Levels from Standby Generator</b></p> <p>The City shall select a standby generator and design it's enclosure in such a manner that it's operation meets the City's Noise Ordinance standards.</p>	Incorporate requirement into specifications.	City of Santa Rosa	Verify requirements are in 90% specifications.	
<p><b>NOI-2: Manage Vibration Levels</b></p> <p>The City shall not use heavy vibration-generating construction equipment to the extent feasible. Where heavy vibration-generating equipment must be used, the City shall prepare a vibration study conducted by a qualified acoustic scientist prior to the start of construction. Because construction is expected to occur 10 to 15 years from the date of this report, it is appropriate to prepare a study at the time of construction to accommodate the aging of buildings and the change in vibration of construction equipment. The study will determine the age and sensitivity of potentially affected structures, determine whether a threshold of 0.3 or 0.5 inch/sec PPV is appropriate for each of them, and estimate the projected vibration impact at each structure. The City shall move the construction or use alternate construction equipment such that the projected Project vibration impact at each structure is less than the appropriate threshold established by the study.</p>	Incorporate requirements and Construction Best Management Practices into specifications.	City of Santa Rosa	Verify requirements are in 90% specifications.	
<p><b>TR-1: Santa Rosa Creek Trail Pedestrian Access</b></p> <p>The City shall ensure that a traffic flagger is available to assist bicyclists and pedestrians crossing Fulton Road from the Santa Rosa Creek Trail, if feasible. If construction does not allow for bicyclist and pedestrian access across Fulton Road, a trail detour shall be put in place for the duration of construction. The approximately 4.5-mile detour would extend from</p>	Incorporate into specifications.	City of Santa Rosa	Verify requirements are in 90% specifications.	

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Willowside Road to Stony Point Road, where the pedestrians and bicyclists could resume use of the Santa Rosa Creek Trail.			Monitor weekly during primary phases of construction.	
<p><b>TCR-1: Protect Tribal Cultural Resources</b></p> <p>The City shall solicit additional information and coordinate with the Federated Indians of Graton Rancheria (FIGR) as design details are developed prior to construction. This will include notification of, and opportunity to observe, geotechnical exploration that may occur in support of the design process. Additional information will be collected and analyzed to determine the appropriate measures to avoid or protect tribal cultural resources during construction. This information will be coordinated with the Tribes seeking further consultation for this Project.</p> <p>A Native American monitor shall be present during construction, if the local Native American tribe requests. If potential tribal cultural resources are uncovered during construction, the City shall halt work and workers shall avoid altering the materials and their context. Project personnel shall not collect cultural materials. A representative of the FIGR will be notified, if not already present. If, after coordination with the Tribe, the City determines that the find potentially qualifies as a tribal cultural resource for purposes of CEQA (either per CEQA Guidelines Section 15064.5 or per the City), all work must remain stopped in the immediate vicinity to allow evaluation of any materials and recommendation of appropriate treatment. Avoidance of impacts to the tribal cultural resource is preferable. In considering any suggested measures to mitigate impacts to tribal cultural resources, the City shall determine whether avoidance is feasible in light of factors such as the nature of the find, project design, costs, and other considerations. If avoidance is infeasible, other appropriate measures as recommended by the Tribe (e.g., reburial of resources) shall be instituted. Work may proceed on other parts of the Project while mitigation for tribal cultural resources is being carried out.</p>	Continue coordinating with California Native American tribes.	City of Santa Rosa	<p>Notify FIGR, prior to any ground disturbing activity including geotechnical borings.</p> <p>Allow tribal monitoring during construction, if tribe wishes to be present.</p> <p>If needed, implement measures to avoid or protect tribal cultural resources</p>	