

**EXHIBIT C**

TO CITY COUNCIL RESOLUTION NO. RES-2020-038

**MITIGATION MONITORING AND REPORTING PROGRAM**  
**FOR THE CARITAS VILLAGE PROJECT**

<b>Mitigation Measure</b>	<b>Responsible Party</b>	<b>Monitoring Timing</b>	<b>Monitoring and Reporting Program</b>	<b>Standards for Success</b>
<b>Section 3.2 Air Quality</b>				
<p><b>MM AQ-1: Implement Construction Best Management Practices.</b></p> <p>The applicant shall require all construction contractors to implement the basic construction mitigation measures recommended by the Bay Area Air Quality Management District (BAAQMD) to reduce fugitive dust emissions. While additional measures may be identified by the BAAQMD or contractor as appropriate, emission reduction measures will include, at a minimum, the following measures:</p> <ul style="list-style-type: none"> <li>s) all exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) will be watered two times per day;</li> <li>t) all haul trucks transporting soil, sand, or other loose material offsite will be covered;</li> <li>u) all visible mud or dirt track-out onto adjacent public roads will be removed using wet power</li> </ul>	<p>The Applicant and Contractor</p>	<p>During construction</p>	<p>During construction regular inspections shall be performed by an Applicant representative and reports shall be kept on file by the Applicant for inspection by the BAAQMD, City, or other interested parties.</p>	<p>Visible particles and construction dust are kept to the lowest practicable level during construction periods. Activities that would generate air quality complaints from the public are avoided</p>

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<p>vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited;</p> <p>v) all vehicle speeds on unpaved roads will be limited to 15 miles per hour;</p> <p>w) all roadways, driveways, and sidewalks to be paved will be completed as soon as possible. Building pads will be laid as soon as possible after grading unless seeding or soil binders are used; and</p> <p>x) idling times shall be minimized either by shutting equipment off when not in use or by reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of the California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.</p> <p>y) all construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.</p> <p>z) a publicly visible sign shall be posted with the telephone number and person to contact at the City regarding dust complaints. This person will respond and take corrective action within 48 hours. The BAAQMD phone number will also be visible to ensure compliance with applicable regulations.</p>				

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aa) substitute electrified equipment for diesel- and gasoline-powered equipment where practical.				
<p><b>MM AQ-2: Minimize Exhaust Emissions.</b> Exhaust emissions shall be minimized during construction activities with the use of off-road equipment engines that meet or exceed the California Air Resources Board's (CARB) Tier 3 or Tier 4 engine emissions standards for large (greater than 120 horsepower [hp]) off-road equipment. At a minimum, all welding rigs, dozers, and graders shall be certified as compliant with the Tier 4 engine emissions standards as provided in CCR, Title 13, section 2423(b)(1)(B). Engines can achieve these standards through the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, or other options as they become available.</p>	The Applicant and Contractor	During construction	During construction regular inspections shall be performed by an Applicant representative and reports shall be kept on file by the Applicant for inspection by the BAAQMD, City, or other interested parties.	CARB Tier 3 or Tier 4 equipment will be used for all construction equipment greater than 120 hp. Construction emissions are minimized to meet CARB's standards.
<p><b>MM- AQ-3: MERV Filtration System Rating.</b> The applicant shall require that a minimum efficiency reporting value (MERV) filter rating of 13 be used for the indoor air filtration system within both the Caritas Center and Caritas Home facilities.</p>	The Applicant and Contractor	Post-Construction	All indoor air filters shall be inspected for a MERV filter rating of 13.	Indoor air pollutants are minimized post-construction.
<b>Section 3.3 Biological Resources</b>				
<p><b>MM BIO-1: Avoid Disturbance of Nesting Birds.</b> If project activities occur during the nesting season for native birds (February 1 to August 31), the following measures shall be implemented to avoid or</p>	The Applicant	Prior to and during construction	The survey(s) shall be conducted by a qualified biologist and a brief survey	No disturbance of special status species or nesting birds covered under

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<p>minimize the potential for adverse impacts on nesting migratory birds and raptors:</p> <p>A pre-construction nesting bird survey for species protected by the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code will be conducted by a qualified biologist within a 250-foot radius of proposed construction activities for passerines and a 500-foot radius for raptors no more than 2 weeks prior to the start of construction activities.</p> <p>If an active nest is found, the qualified biologist will establish an appropriate no-work buffer around the nest, unless a smaller buffer zone is approved by the California Department of Fish and Wildlife.</p> <p>Construction within the no-work buffer may resume once it is determined by a qualified biologist that the young have left the nest. If a lapse in construction activities of 7 days or more occurs during the nesting season, an additional nesting bird survey is recommended to ensure that no nests were established in the area while construction activities were on hold.</p>			<p>report shall be documented and kept on file by the Applicant.</p>	<p>the MBTA. Exclusion buffers and fencing shall be installed and monitored as necessary.</p>
<p><b>MM BIO-2: Tree Replanting.</b></p> <p>Removed trees will be mitigated through replanting, following all terms and conditions included in the City's tree ordinance permit.</p>	<p>The Applicant</p>	<p>During and post-construction</p>	<p>The Applicant shall verify that the removal and replanting of trees is followed per the City's tree ordinance.</p>	<p>Impacts to trees that are removed as a result of the project would be avoided by appropriately replanting trees,</p>

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				per the City's tree ordinance.
<b>Section 3.4 Cultural Resources</b>				
<p><b>MM CUL-1: Salvage Report.</b>  A Salvage Report shall be prepared prior to the demolition of the relevant structure(s). This report shall identify character-defining features of each of the individual buildings, as well as the broader St. Rose Historic Preservation District. Based upon these identification efforts, noteworthy materials, and architectural features at 520 and/or 608 Morgan Streets shall be identified for potential salvage and reuse throughout the district or, if agreed upon by relevant City staff, other historic preservation districts within the City that have comparable architectural character, historical significance, and period of construction where reuse would not be deemed inappropriate. The Salvage Report shall be prepared by an architectural historian or historic architect that meets the Secretary of the Interior's Standards and Guidelines for Professional Qualifications. Local preservation groups and the City shall be consulted in the preparation of the Salvage Report and all relevant plans.</p>	The Applicant	Prior to construction	The Applicant shall develop the Salvage Report prior to construction activities by a qualified historian or historic architect.	Impacts to relevant structures are avoided or appropriately documented for defining features.
<p><b>MM CUL-2: Public Report Documentation.</b>  The buildings at 520 and 608 Morgan Streets shall be documented prior to commencement of demolition of those structures. This documentation will be</p>	The Applicant	Prior to construction	The buildings at 520 and 608 Morgan Street will be appropriately	The buildings at 520 and 608 are appropriately cataloged in accordance with

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<p>consistent with the Historic American Building Survey (HABS) documentation Level II, although will not require submittal to the Library of Congress. The HABS-like documentation shall include large format photographs and a written history of the properties, including historical contexts related to the St. Rose Historic Preservation District. Materials shall be prepared by an architectural historian, historic architect, or historian that meets the Secretary of the Interior’s Professional Qualifications. Produced materials shall be submitted to local repositories, which should include the City of Santa Rosa Public Library and the Museum of Sonoma County. While public documentation is instrumental in understanding and cataloguing alterations to historical resources, it should be noted that Section II.C-Demolition in the Design Guidelines specifically states that public documentation is not sufficient as a stand-alone mitigation measure.</p>			<p>cataloged and analyzed by a qualified historic architect or architectural historian. All produced materials shall be submitted to the applicable parties.</p>	<p>regulations and the appropriate parties are notified.</p>
<p><b>MM CUL-3: Interpretive Materials.</b> At least three sets of interpretive materials related to the history of the property as well as the broader St. Rose Historic Preservation Historic District shall be produced and installed. The exact medium of the interpretive materials will not be specified so as not to inhibit creativity, although minimal efforts include panels, signage, museum exhibits, or interactive landscape elements, such as play elements or site furnishings.</p>	<p>The Applicant</p>	<p>Prior to and post-construction</p>	<p>The Applicant shall develop the interpretative sign and ensure that it is approved through the Santa Rosa Cultural Heritage Board, prior to placement.</p>	<p>Impacts related the impacted structures will be cataloged and presented to the public through interpretative materials.</p>

Mitigation Measure	Responsible Party	Monitoring Timing	Monitoring and Reporting Program	Standards for Success
<p>Interpretive materials shall be located adjacent to, and accessible from, the public right-of-way, and in the vicinity of the following: 1) the Catholic Charities entrance area; 2) the homes entrance area; and 3) the entrance near the parking lot. The specific historical themes reflected at each specific location should reflect on the development of the St. Rose Historic District and associated historic contexts and themes. Interpretive materials shall feature physical elements that reflect the character-defining features of the historic district, including materials, architectural forms, details, and other unifying elements. Proposed interpretive material designs, including narratives, will be presented to the Santa Rosa Cultural Heritage Board for comment and approval prior to installation.</p>				
<p><b>MM CUL-4: Compatible Design.</b>  The developer of the project shall work with a historic architect or architectural historian who meets the Secretary of the Interior’s Professional Qualifications Standards to ensure that the proposed project meets the relevant requirements of the City of Santa Rosa Design Guidelines, particularly under Section 2.4: Historic Districts within the Downtown Area and Station Area and Section 4.7: Historic Properties and Districts-III.G-new Construction. A presentation will be made to the Santa Rosa Cultural Heritage Board that outlines the finalized project design and its compatibility with the surrounding</p>	<p>The Applicant</p>	<p>Prior to construction, during final design.</p>	<p>The applicant shall verify that a historic architect or architectural historian is consulted during the final design phase for the project to ensure that applicable regulations are met.</p>	<p>The Santa Rosa Cultural Heritage Board shall approve the design prior to issuance of a building permit. The design of the project shall be consistent  <b>Design elements 10 and 11 from the Northern Pedestrian</b></p>

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<p>historic district; this will be subject to Cultural Heritage Board comments and approval.</p> <p>The Applicant shall provide a small gateway monument on the north side of the intersection of 7th and A Street consistent with the City of Santa Rosa Downtown Northern Pedestrian Linkage Study, element 10. Additionally, the project shall incorporate the use of historic urban sidewalk treatments and historic benches within the project area consistent with the City of Santa Rosa Downtown Northern Pedestrian Linkage Study, element 11.</p>				<p>Linkage Study shall be incorporated into the final design of the project.</p>
<p><b>MM CUL-5: Cultural Resource Awareness Training.</b></p> <p>Prior to the initiation of the project, a cultural resources training shall be provided to supervisors, the contract foreman, construction crew members, and any additional key construction personnel. A qualified archaeologist shall administer the training. The purpose of the training is to increase awareness and knowledge of cultural resources and appropriate protocols in the event of an inadvertent discovery. The training shall include a discussion of the procedures for stopping work and notification of key City personnel if an inadvertent discovery of cultural resources occurs during project construction. If human remains are discovered, the appropriate protocols shall also be discussed. Upon completion of the training, participants shall be able to define</p>	<p>The Applicant</p>	<p>Prior to and during construction</p>	<p>The training shall be conducted by a qualified Applicant representative and documented (by sign-in or other method) by the Applicant's contractor for the dates the training occurred, and the staff trained. Retention of the Cultural Resource Awareness Training reference</p>	<p>Construction personnel are trained in the key characteristics for identifying and avoiding impacts to cultural resources.</p>



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<p>cultural resources, describe the policies and procedures for identifying and protecting cultural resources, know how to locate and receive assistance from the qualified archaeologist and coordinate with other sources, and describe steps to be taken when cultural resources are encountered during project implementation. All new construction personnel added after construction commences shall receive the same training and orientation before working onsite. If Native American monitors are used, it shall be necessary for tribal representatives to also participate in the training.</p>			<p>pamphlets shall also be kept on the construction site and within the Applicant's files.</p>	
<p><b>MM CUL-6: Construction Monitoring.</b>  If evidence of any prehistoric or historic-era subsurface archaeological features or deposits are discovered during excavation or other earth-moving activities, the qualified archaeologist shall assess the significance of the find(s) and determine the appropriate treatment. Appropriate treatment may include recordation and/or additional excavation. A monitoring report shall be completed by the archaeological monitor at the end of construction. This report shall include a brief summary of the pre-construction cultural resource awareness training and the results of monitoring. The monitoring report shall be kept on file with the City.</p>	<p>The Applicant</p>	<p>During construction</p>	<p>A qualified archeologist shall report and asses any find(s) in accordance with applicable regulations. The monitoring report shall be kept on file by the Applicant and submitted to the City of their records.</p>	<p>Previously undiscovered cultural resources are protected and avoided throughout construction activities.</p>
<p><b>MM CUL-7: Unanticipated Discovery of Cultural Resources.</b>  If prehistoric or historic-era cultural resources are</p>	<p>The Applicant</p>	<p>During construction</p>	<p>If prehistoric or historic-era resources are</p>	<p>The recording, evaluation, and treatment of any discovered</p>

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<p>encountered during the course of grading or construction, all ground-disturbing activities within 50 feet of the find shall cease. The qualified archaeologist shall evaluate the significance of the resources and recommend appropriate treatment measures. Per CEQA Guidelines Section 15126.4(b)(3)(A), project redesign and preservation in place shall be the preferred means to avoid impacts to significant archaeological sites. Consistent with CEQA Guidelines Section 15126.4(b)(3)(C), if it is demonstrated that resources cannot be avoided, the qualified archaeologist shall develop additional treatment measures in consultation with the City, which may include data recovery or other appropriate measures. The City shall consult with appropriate Native American representatives in determining appropriate treatment for unearthened cultural resources if the resources are prehistoric or Native American in nature. Archaeological materials recovered during any investigation shall be curated at an accredited curational facility. The qualified archaeologist shall prepare a report documenting evaluation and additional treatment of the resource. A copy of the report shall be provided to the City and to the Northwest information Center. Construction shall recommence based on direction of the qualified archaeologist.</p>			<p>encountered during any project- related activity, the Applicant shall comply with the requirements of this mitigation measure and appropriate documentation provided to applicable agencies.</p>	<p>prehistoric or historic-era resources is applied in accordance with this mitigation measure.</p>
<p><b>MM CUL-8: Procedures for Human Burials Encountered During Construction.</b> If ground-disturbing activities uncover previously</p>	<p>The Applicant</p>	<p>During construction</p>	<p>If human remains are encountered (or are suspected)</p>	<p>The recording, evaluation, and treatment of any</p>

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<p>unknown human remains, Section 7050.5 of Health and Safety Code (HSC) applies, and the following procedures shall be followed:</p> <p>There shall be no further excavation or disturbance of the area where the human remains were found or within 100 feet of the find until the Sonoma County Coroner and the appropriate City of Santa Rosa representative are contacted. Duly authorized representatives of the Coroner and the City shall be permitted onto the project site and shall take all actions consistent with HSC Section 7050.5 and Government Code Sections 27460, et seq.</p> <p>Excavation or disturbance of the area where the human remains were found and an area within 100 feet of the find shall not be permitted to recommence until the Coroner determines that the remains are not subject to the provisions of law concerning investigation of the circumstances, manner, and cause of any death.</p> <p>If the Coroner determines the remains are Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours, and the NAHC shall identify the person or persons it believes to be the “most likely descendant” (MLD) of the deceased Native American. The MLD may make recommendations to the landowner or the person responsible for the excavation work for means of treating or disposing of, with appropriate dignity, the human remains</p>			<p>during any project-related activity, the Applicant shall comply with the requirements of the HSC as outlined in this mitigation measure.</p>	<p>discovered human remains is applied in accordance with this mitigation measure.</p>

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<p>and any associated grave goods as provided in Public Resources Code Section 5097.98. If the MLD does not make recommendations within 48 hours, the landowner shall reinter the remains in an area of the property secure from further disturbance. If the landowner does not accept the MLD's recommendations, the owner or the MLD may request mediation by NAHC.</p>				
<b>Section 3.7 Noise</b>				
<p><b>MM NOI-1: Construction Hours.</b> Construction activities shall be limited to the hours of 7:00 AM and 7:00 PM on weekdays and 9:00 AM to 5:00 PM on Saturdays, with no noise generating construction on Sundays or holidays.</p>	<p>The Applicant and Contractor</p>	<p>During construction</p>	<p>The Applicant shall document timing of construction activities and verify that construction timing restrictions are being met throughout construction activities.</p>	<p>Compliance with construction hour limitations.</p>
<p><b>MM NOI-2: Construction Activity.</b> Implementation of the following multi-part mitigation plan is required to reduce the potential construction period noise impacts. Use a comprehensive program of noise prevention through planning and mitigation and consider noise impacts as a crucial factor in project approval.</p>	<p>The Applicant and Contractor</p>	<p>Prior to and during construction</p>	<p>During construction, regular inspections shall be performed for construction noise prevention measures by an</p>	<p>Noise throughout construction activities is minimized. Sensitive receptors are notified of possible construction noise in</p>

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<p>Construct noise barriers such as temporary walls or piles of excavated material between noisy activities and noise-sensitive receivers.</p> <p>Site equipment on the construction lot as far away from noise-sensitive sites as possible.</p> <p>Construct walled enclosures around especially noisy activities or clusters of noisy equipment. For example, shields can be used around pavement breakers, and loaded vinyl curtains can be draped under elevated structures.</p> <p>Combine noisy operations to occur in the same time period. The total noise level produced shall not be significantly greater than the level produced if the operations were performed separately.</p> <p>Avoid nighttime activities. Sensitivity to noise increases during the nighttime hours in residential neighborhoods.</p> <p>Use rammed aggregate piers instead of pile driving to reinforce soils for the upper 20 feet of the project site to avoid impacts associated with pile driving.</p> <p>Use specially quieted equipment, such as quieted and enclosed air compressors or mufflers, on all engines.</p> <p>Select quieter demolition methods where possible. For example, sawing bridge decks into sections that can be loaded onto trucks results in lower cumulative noise levels than impact demolition by pavement breakers.</p> <p>Post a construction site notice that includes the following information: job site address, permit</p>			<p>Applicant representative and reports shall be kept on file by the Applicant for inspection interested parties.</p>	<p>compliance with this measure.</p>

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<p>number, name and phone number of the contractor and owner or owner’s agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public and approved by the City.</p>				
<b>Section 3.8 Transportation</b>				
<p><b>MM TRANS-1: Construction Traffic Management Plan.</b>  A traffic management plan shall be submitted to the City for review and approval prior to the issuance for construction activities of any construction permits. The traffic management plan shall be prepared in accordance with both the California’s Manual on Uniform Traffic Control Devices and Work Area Traffic Control Handbook. The traffic management plan shall route trucks into the sites avoiding 7th Street, A Street north of 7th Street, and Morgan Street north of 7th Street as much as possible. Avoiding these streets keeps construction traffic removed from the sensitive single-family homes along Morgan and A Streets. The traffic management plan shall also include strategies for minimizing impacts to traffic, effectively managing traffic flow and reducing the number of trips accessing the project site during the peak hours of 7 AM to 9 AM</p>	<p>The Applicant and Contractor  <b>The Applicant shall be responsible for the preparation of an evacuation plan for Caritas Village.</b></p>	<p>Prior to and during construction  <b>The evacuation plan shall be provided prior to the start of construction.</b></p>	<p>The Applicant shall monitor and coordinate with the contractor during construction meetings to ensure that the construction management plan is implemented successfully as documented in inspection logs, and the construction traffic management plan shall remain on file at the</p>	<p>Traffic flow remains at acceptable levels during construction. Emergency access is not restricted and remains reasonably possible at all times. The project area remains in compliance with all applicable transportation goals, policies, and requirements.  <b>The City of Santa</b></p>

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<p>and 4 PM to 6 PM These strategies shall include, but not be limited to:</p> <ul style="list-style-type: none"> <li>Temporary traffic control plan that addresses traffic safety and control through the work zone;</li> <li>Directing construction traffic with a flagger;</li> <li>Placing temporary signage, lighting, and traffic control devices if required, including but not limited to appropriate signage along access routes to indicate the presences of heavy vehicles and construction traffic;</li> <li>Require parking within designated areas on the project site and prohibit parking along the shoulders of adjacent roadways.</li> <li>Provide for emergency vehicle movement through the project site at all times during construction and operation.</li> <li>Provide approved offsite parking for workers with shuttle services to transport them onsite when and if onsite parking becomes restricted or unfeasible.</li> <li>Facilitate materials delivery during off-peak traffic hours and comply with regulations governing oversized loads.</li> <li>Encourage vanpool and carpool for construction employees commuting to the project site.</li> </ul> <p style="color: red;">The applicant shall prepare and submit evacuation plan(s) for Caritas Village to the City of Santa Rosa Fire Marshal prior to the start of construction of the Caritas Village. The plan shall be reviewed and approved prior to the start of construction.</p>			<p>Applicant offices and provided to the City for their files.</p> <p style="color: red;">The Applicant shall provide the City of Santa Rosa Fire Marshal with an evacuation plan(s) for Caritas Village.</p>	<p style="color: red;">Rosa Fire Marshal shall deem the evacuation plan(s) complete and adequate.</p>

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<b>Section 3.11 Hazards and Hazardous Materials</b>				
<p><b>MM HAZ-1: Removal of Biohazardous and Medical Waste.</b></p> <p>Prior to construction, the applicant shall retain a certified biohazardous waste contractor to inspect the project site and determine if biohazardous and medical waste are present. If present, the certified contractor would remediate the project site in accordance with the California Department of Public Health regulations and the California Division of Occupational Safety and Health (Cal/OSHA) worker safety requirements. The certified contractor would dispose of all biohazardous and medical waste at a certified medical waste processing facility in accordance with the California Medical Waste Management Act to ensure that these materials are not released into the environment.</p>	The Applicant	Prior to construction	The Applicant shall ensure that the certified biohazards waste contractor inspected the site prior to construction activities and document any biohazardous or medical wastes that are removed.	The project site will be appropriately remediated for biohazardous and medical wastes in compliance with Cal/OSHA and the California Department of Public Health requirements.
<p><b>MM HAZ-2: Removal of Asbestos Containing Materials and/or Lead Based Paint.</b> A comprehensive survey for the presence of asbestos-containing material and lead-based paint shall be conducted at the project site prior to any demolition activities. Demolition of buildings containing asbestos materials or lead based paint must be achieved in accordance with state and federal regulations, including the United States Environmental Protection Agencies (USEPA) Asbestos National Emissions Standards for Hazardous Air Pollutants, Cal/OSHA's Construction</p>	The Applicant	Prior to and during construction	Documentation of the survey shall be kept on file at the Applicants office and provided to the City for their records. Demolition of buildings documented for asbestos	Impacts related to release of asbestos or lead are minimized and applicable state and federal regulations are met.



Mitigation Measure	Responsible Party	Monitoring Timing	Monitoring and Reporting Program	Standards for Success
<p>Lead Standard (8 CCR 1432.1), and California Department of Toxic Substances Control and USEPA requirements for disposal of hazardous waste. Disposal of any asbestos-containing materials or lead-based paint found on the site shall be carried out by a contractor trained and qualified to conduct lead- or asbestos-related construction work and in accordance with the appropriate state and federal standards to ensure that these materials are not released into the air in the project vicinity.</p>			<p>containing materials or lead based paint shall comply with federal and State regulations outline in this measure.</p>	
<p><b>MM HAZ-3: Install Sharps Kiosk Station.</b> The applicant shall obtain a Home-Generated Sharps Consolidation Point permit from Sonoma County to install a Sharps Kiosk at the project site. The kiosk shall be placed onsite in an area that is accessible to visitors and residents. The applicant shall retain a biohazardous waste contractor to collect the hazardous materials from the kiosk weekly and transport them to a certified medical waste processing facility for disposal in accordance with the California Medical Waste Management Act.</p>	<p>The Applicant</p>	<p>Prior to and post-construction</p>	<p>The Applicant shall ensure that the Sharps Kiosk is installed on the project site prior to building construction.</p>	<p>Impacts related to biohazards are minimized on the project site.</p>
<p><b>MM HAZ-4: Install Environmental Design Features.</b> The applicant must install environmental design features at the project site to reduce illicit behaviors such as loitering, trespassing, littering and garbage, disposal of sharps, and bathroom incivility. The design features must include additional lighting, camera surveillance, provision of proper disposal</p>	<p>The Applicant</p>	<p>Prior to and post-construction</p>	<p>The Applicant shall incorporate environmental design features that will reduce illicit behaviors into the design of the project. The</p>	<p>Impacts related to illicit behaviors are minimized.</p>

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containers, or other design features approved by the City.			design plans shall be approved by the City prior to issuance of a building permit.	