

**Mitigation Monitoring and Reporting Program  
for the  
Oakmont Senior Living - Emerald Isle Assisted Living Facility Project  
Initial Study/Mitigated Negative Declaration  
City of Santa Rosa, Sonoma County, California**

Prepared for:  
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**Table 1: Emerald Isle Skilled Nursing Facility Project Mitigation Monitoring and Reporting Program**

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
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<b>3. Air Quality</b>					
<p><b>MM AIR-1:</b> The following Best Management Practices, as recommended by the BAAQMD, shall be included in the Project design and implemented during construction:</p> <ul style="list-style-type: none"> <li>a. All active construction areas shall be watered at least two times per day.</li> <li>b. All exposed non-paved surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and access roads) shall be watered at least three times per day and/or non-toxic soil stabilizers shall be applied to exposed non-paved surfaces.</li> <li>c. All haul trucks transporting soil, sand, or other loose material off-site shall be covered and/or shall maintain at least 2 feet of freeboard.</li> <li>d. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</li> <li>e. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>f. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>g. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of CCR). Clear signage regarding idling restrictions shall be provided for construction workers at all access points.</li> <li>h. 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> </ul>	Incorporate into project construction documents	Prior to issuance of build permit	City of Santa Rosa Planning & Economic Development Department: Building Division		

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i. The prime construction contractor shall post a publicly visible sign with the telephone number and person to contact at the BAAQMD regarding dust complaints. BAAQMD and the construction contractor shall take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.					
<b>MM AIR-2:</b> The developer or Project Applicant shall ensure all off-road construction equipment in excess of 50 horsepower used on-site by the developer or contractors is equipped with engines meeting the EPA Tier IV off-road engine emission standards. The construction contractor shall maintain a log of equipment use at the construction site with make, model serial number, and certification level of each piece of construction equipment that will be available for review by City building inspection staff.	Incorporation into bid documents  On-site inspection, submittal of logs	Prior to issue of building permit  Prior to any fuel powered grading or construction activities	City of Santa Rosa Planning & Economic Development Department: Building Division		
<b>4. Biological Resources</b>					
<b>MM BIO-1a: Special-Status Plants</b> Prior to any vegetation removal or ground-disturbing activities, focused botanical surveys shall be conducted to determine the presence of special-status plant species Napa false indigo, narrow-anthered brodiaea and holly-leaved ceanothus,, which have the potential to occur in the Project Study Area (Project site). Surveys shall be conducted in accordance with Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFG 2009). These guidelines require plant surveys to be conducted at the proper time of year when the species are both “evident” and identifiable. Field surveys shall be scheduled to coincide with known blooming periods, and/or during periods of physiological development that are necessary to identify the plant species of	On-site surveys, submittal of survey documents	Prior to commencement of construction and during known blooming periods	City of Santa Rosa Planning & Economic Development Department; California Department of Fish and Game		

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<p>concern. If no special-status plant species are found within the Project site, then the Project will not have any impacts to the species and no additional mitigation measures are necessary.</p> <p>1. If focused surveys indicate that special-status plant species are present within the Project site, the Project proponent shall evaluate the feasibility of reconfiguring the Project design in order to avoid or minimize impacts to special-status plant species. In addition to avoiding direct impacts to special-status plant species, potential indirect, Project construction and operation impacts shall be minimized to the maximum extent feasible through means that include but are not limited to the installation of protective fencing and environmentally sensitive area signage. Additionally, a Worker Environmental Awareness Program shall be implemented to educate construction workers about the presence of special-status species or other sensitive resources, including special-status plant species in and near the Project site, and to instruct them on proper avoidance, and required measures and practices for protecting biological resources and contacts and procedures in case species are injured or encountered during construction.</p> <p>2. If special-status plant species are found on-site and cannot be avoided, the applicant shall coordinate with the United States Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW), as applicable, to determine feasible impact minimization and mitigation measures for rare plants, which may include but are not limited to the following:</p> <ul style="list-style-type: none"> <li>- Habitat restoration to mitigate for unavoidable temporary construction impacts to special-status plant species habitat on-site.</li> <li>- Incorporating Project features designed to reduce ongoing</li> </ul>					

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<p>impacts from Project operation, including controlling public access to avoided special-status plant species habitat remaining on-site.</p> <ul style="list-style-type: none"> <li>- In conjunction with academic institutions and/or regional native plant nurseries, a propagation program shall be developed for the salvage and transfer of special-status plant species populations from the Project site before the initiation of construction activities. Permits may be required from the USFWS or CDFW that will ensure that certified biologists are involved in the propagation and transport of rare, threatened, or endangered plant species. (Note that propagation methods for the salvaged plant population must be developed on a case-by-case basis and must include the involvement of local conservation easements, preserves, and open space, where applicable.) The propagation of individual plant species must be performed at the correct time of year and successfully completed before the Project’s construction activities eliminate or disturb the plants and habitats of concern.</li> <li>- Efforts should be made to salvage portions of the habitat or plant populations that will be lost as a result of implementation of the proposed Project. In addition to salvaging special-status plant species themselves, salvage efforts shall include soil and seed-banks surrounding impacted plants, if doing so will not contribute to the spread of invasive or noxious plant species.</li> <li>- Appropriate off-site conservation opportunities shall be identified and, if feasible, protected in perpetuity through the purchase of conservation easements and/or mitigation bank credits. The habitat value of off-site conservation areas shall be enhanced where feasible through means such as reducing grazing intensity and restricting off-road vehicle</li> </ul>					

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access. At a minimum, the acreage of off-site habitat conserved should exceed a 1:1 ratio of impacted rare plant habitat within the Project site. The ratio should increase depending on the rarity of the affected rare plant species, and the abundance of the rare plant habitat impacted.					
<p><b>MM BIO-1b: Migratory Birds and Nesting Raptors</b></p> <p>1. If construction or tree removal is proposed during the breeding/nesting season for local avian species (typically March 1 through August 31), a focused survey for active nests of raptors and migratory birds within and in the vicinity of (no less than 250 feet outside the Project boundaries, where possible) the Project site shall be conducted by a qualified biologist. Two surveys will be conducted, at least one (1) week apart, with the second survey occurring no more than two (2) days prior to tree removal. If no active nests are found, tree removal or construction activities may proceed.</p> <p>2. If an active nest is located during pre-construction surveys, the United States Fish and Wildlife Service and/or the California Department of Fish and Wildlife (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted to avoid disturbance of the nest until it is abandoned or the biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones or alteration of the construction schedule.</p>	On-site surveys , submittal of survey documents	Prior to tree removals and during breeding/nesting season (March 1 through August 31)	City of Santa Rosa Planning & Economic Development Department; California Department of Fish and Game		
<p><b>MM BIO-1c: Special-Status Bats</b></p> <p>1. To reduce construction-related impacts to special-status bat species, a bat survey shall be conducted between March 1 and July 31 by a qualified wildlife biologist in the year prior to ground disturbance. If no bat roosts are detected, then no further action is required.</p>	On-site surveys, submittal of survey documents	Prior to commencement of construction, and between March 1 to July 31 (in same year as ground	City of Santa Rosa Planning & Economic Development Department; California Department of Fish		

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<p>2. If a colony of bats is found roosting on-site, then the following mitigation will be implemented to reduce the potential disturbance:</p> <ul style="list-style-type: none"> <li>- If a female or maternity roost of bats is found on the Project site, a wildlife biologist through coordination with CDFW shall determine what physical and timed buffer zones shall be employed to ensure the continued success of the colony. Such buffer zones may include a construction-free barrier of 200 feet from the roost and/or the timing of the construction activities outside of the maternity roost season (after July 31 and before March 1).</li> </ul>		disturbance)	and Game		
<p><b>MM BIO-2: Oak Woodland Habitat</b>                      The following mitigation measures for impacts to oak woodland habitat shall be implemented:</p> <p>1. Where it is feasible to avoid protected trees, keep vehicles and mechanical equipment outside the dripline of these trees. In areas where oaks or other protected trees cannot be avoided, replace trees removed with the same native tree species at a minimum 3:1 ratio, or as required by the following applicable ordinance:</p> <p>The City of Santa Rosa’s tree ordinance, City Code Ch. 17-24, Ord. 2858, applies to any tree having a diameter breast height (DBH) of 4 inches or more, and includes the following species: big leaf maple (<i>Acer macrophyllum</i>), black oak (<i>Quercus kelloggii</i>), blue oak (<i>Quercus douglasii</i>), Coast live oak (<i>Quercus agrifolia</i>), interior live oak (<i>Quercus wislizenii</i>), madrone (<i>Arbutus menziesii</i>), oracle oak (<i>Quercus morehus</i>), Oregon oak (<i>Quercus garryana</i>), redwood (<i>Sequoia sempervirens</i>), Valley oak (<i>Quercus lobata</i>), and California bay (<i>Umbellularia California</i>).</p> <p>2. The Project applicant shall conduct monitoring for 3 years</p>	Incorporate into project design and construction documents; on-site observation for 3 years following planting	Prior to issuance of building permit. In-lieu to be paid at time of Building permit issuance.	City of Santa Rosa Planning & Economic Development Department: Building Division		



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following planting to verify that trees have successfully reestablished.					
<p><b>MM BIO-4:</b> To minimize impacts to existing trees and from the loss of 304 of trees scheduled for removal during Project construction, the Project applicant shall implement the following:</p> <ol style="list-style-type: none"> <li>1. No parking, storage of materials, disposal of any waste materials, or unnecessary operation of equipment shall occur within the driplines of trees to remain.</li> <li>2. If pruning for clearance is required on any trees to remain, it shall be conducted by trained, qualified tree workers according to International Society of Arboriculture and American National Standards Institute’s Pruning Guidelines. Pruning should be the minimum necessary for hazard reduction, (e.g., the removal of deadwood 2 inches and larger), and clearance. Project arborist shall meet with tree service contractor prior to work to discuss limits and goals of pruning.</li> <li>3. Care shall be taken to avoid damaging trunks or branches of protected trees. Where necessary, trunks shall be wrapped with thick layers of burlap or straw wattle for protection.</li> <li>4. The Project arborist shall be notified a minimum of 24 hours in advance to be present on-site during rough grading or trenching within the Tree Protection Zones of trees to be preserved, as designated on the plans. Tree protection fencing shall be installed and maintained in place throughout construction.</li> <li>5. If any roots larger than 1 inch are encountered which cannot be preserved, they should be cut cleanly across the face of the root with a sharp saw. No treatment of the cut end is necessary. Backfill of the exposed cut roots shall be done as quickly as possible to prevent desiccation.</li> </ol>	Incorporate into project design and construction documents; on-site inspection	Prior to issuance of building permit.	City of Santa Rosa Planning & Economic Development Department: Building Division		

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<p>6. In areas where soil compaction within root zones of protected trees has occurred, loosening of soil surface shall be completed prior to final walkthrough of each area. Consult the Project manager or Project arborist for recommendations of technique.</p> <p>7. Where practical, arbor mulch (chipped wood bark and foliage, 2-inch layer minimum) should be spread and retained under protected trees to serve as a permanent top dressing and mulch.</p> <p>8. Replacement/replanting of a minimum of 1,188 15-gallon size trees within the Project site or other City-approved location or as approved through coordination with the City.</p>					
<b>5. Cultural Resources</b>					
<p><b>MM CUL-1:</b> An archaeologist who meets the Secretary of Interior’s Professional Qualification Standards for archaeology should be present during the initial phase of ground disturbance in order to check for the inadvertent exposure of cultural materials. This may be followed by regular periodic or “spot-check” archaeological monitoring during ground disturbance as needed, but full-time archaeological monitoring is not required at this time. In the event a potentially significant cultural resource is encountered during subsurface earthwork activities, all construction activities within a 100-foot radius of the find shall cease and workers should avoid altering the materials until an archaeologist has evaluated the situation. The Applicant shall include a standard inadvertent discovery clause in every construction contract to inform contractors of this requirement. Potentially significant cultural resources consist of but are not limited to stone, bone, glass, ceramics, fossils, wood, or shell artifacts, or features including hearths, structural remains, or historic dumpsites. The</p>	<p>On-site inspection and monitoring; submittal of findings and documentation</p>	<p>During initial phase of ground disturbance</p>	<p>City of Santa Rosa Planning &amp; Economic Development Department</p>		

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archaeologist shall make recommendations concerning appropriate measures that will be implemented to protect the resource, including but not limited to excavation and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines. Any previously undiscovered resources found during construction within the Project site shall be recorded on appropriate Department of Parks and Recreation (DPR) 523 forms and will be submitted to the City of Santa Rosa, the Northwest Information Center, and the State Historic Preservation Office (SHPO), if required.					
<b>6. Geology and Soils</b>					
<b>MM GEO-1:</b> Design of proposed structures on the site shall be done in conformance with the seismic provisions of the 2013 CBC and the recommendations of the recommendations of the Reese & Associates Geotechnical report dated September 21, 2016, including the parameters developed pursuant to a Risk-Targeted Maximum Considered Earthquake (MCfa) Ground Motion Hazard Analysis per ASCE 7-10 Section 21.2. A qualified geotechnical engineer shall review the final foundation and building plans to ensure conformance with the recommendations.	Approval of final grading and foundation plans	Prior to issuance of grading and building permits	City of Santa Rosa Planning & Economic Development Department: Building Division		
<b>MM GEO-2:</b> Design and construction of fills, cuts, foundations, retaining walls and slabs shall recognize the presence of creep-affected soils and be done in compliance with the recommendations of the Reese & Associates Geotechnical report, dated September 21, 2016. Grading measures such as overexcavation of creep-affected soil and replacement as properly keyed, benched and compacted fill shall be implemented and foundations and retaining walls shall be designed to resist lateral creep soil loads. A qualified geotechnical engineer shall review the final grading and foundation plans to ensure conformance with the recommendations.	Approval of final grading and foundation plans	Prior to issuance of grading and building permits	City of Santa Rosa Planning & Economic Development Department: Building Division		

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<p><b>MM GEO-3:</b> The Applicant shall adhere to the recommendations of the Reese &amp; Associates Geotechnical report regarding weak, porous soils and expansive soils onsite. Expansive soils encountered within building envelopes shall be removed for their full depth or covered with a moisture confining and protecting blanket of approved on-site or imported materials of low expansion potential prior to erection of structures. Additionally, for slab-on-grade support, the Applicant shall verify that expansive soils have not dried and cracked. The Applicant shall document completion of these actions and submit verification to the City prior to issuance of the certificate of occupancy.</p>	<p>Submittal of records documentation completion</p>	<p>Prior to issuance of the certificate of occupancy</p>	<p>City of Santa Rosa Planning &amp; Economic Development Department: Building Division</p>		
<p><b>12. Noise</b></p>					
<p><b>MM NOI-1:</b> Implementation of the following multi-part mitigation measure is required to reduce potential construction period noise impacts:</p> <ul style="list-style-type: none"> <li>• The construction contractor shall ensure that all equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment.</li> <li>• The construction contractor shall ensure that unnecessary idling of internal combustion engines (i.e., idling in excess of 5 minutes) is prohibited.</li> <li>• The construction contractor shall utilize “quiet” models of air compressors and other stationary noise sources where technology exists.</li> <li>• At all times during Project grading and construction, the construction contractor shall ensure that stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from adjacent residences.</li> <li>• The construction contractor shall ensure that the</li> </ul>	<p>Record in contract specifications</p> <p>Periodic submittal of on-site inspection monitoring reports</p>	<p>Prior to issuance of grading and building permits</p> <p>Prior to and during construction</p>	<p>City of Santa Rosa Planning &amp; Economic Development Department: Building Division</p>		

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<p>construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the Project site.</p> <ul style="list-style-type: none"> <li>All on-site demolition and construction activities, including deliveries and engine warm-up, shall be restricted to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, and between 8:00 a.m. and 6:00 p.m. on Saturday. No such activities shall be permitted on Sundays or holidays.</li> </ul>					
<b>16. Transportation/Traffic</b>					
<p><b>MM TRANS-1:</b> In order to ensure site line distance based on sight distance criteria contained in the Caltrans Highway Design Manual, the Project applicants shall be responsible for restriping Thomas Lake Harris Drive in the vicinity to include a two-way left-turn lane, the design of which shall be specified and approved by the City of Santa Rosa Public Works Department.</p>	Approval of site plans; site inspection	Prior to final site plan approval; prior to issuance of the certificate of occupancy	City of Santa Rosa Transportation and Public Works Department		