

**Appendix H:  
Mitigation Monitoring and Reporting Program**

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**Mitigation Monitoring and Reporting Program  
for the  
Emerald Isle Condominium Project  
(formerly known as the Emerald Isle Assisted Living Facility Project)  
Draft Subsequent Mitigated Negative Declaration  
City of Santa Rosa, Sonoma County, California**

Prepared for:

**City of Santa Rosa**

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Report Date: September 9, 2019

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**Table 1: Emerald Isle Condominium 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 BMPs, 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, California Code of Regulations, Title 13, Section 2485). Clear signage regarding idling restrictions shall be provided for construction workers at all access points.</li> </ul>	<p>Incorporation into project construction documents; the City of Santa Rosa Planning and Economic Development Department shall inspect the worksite regularly to ensure the construction mitigation measures are implemented</p>	<p>Prior to issuance of building permit</p>	<p>City of Santa Rosa Planning and Economic Development Department: Building Division</p>		

**Table 1 (cont.): Emerald Isle Condominium Project Mitigation Monitoring and Reporting Program**

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<p>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.</p> <p>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.</p>					
<p><b>MM AIR-2:</b> During construction activities, the developer or project applicant shall ensure all off-road equipment in excess of 50 horsepower used on-site by the developer or contractors is equipped with engines meeting the EPA Tier IV Final 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.</p>	<p>Incorporation into bid documents</p> <p>On-site inspection; submittal of logs</p>	<p>Prior to issuance of building permit</p> <p>Prior to any fuel powered grading or construction activities</p>	<p>City of Santa Rosa Planning and Economic Development Department: Building Division</p>		
<p><b>4. Biological Resources</b></p>					
<p><b>MM BIO-1a:</b> Prior to any vegetation removal or ground-disturbing activities, focused botanical surveys shall be conducted to determine the presence of various special-status plant species including Napa false indigo, Bent-flowered fiddleneck, Narrow-anthered brodiaea, Hollyleaf ceanothus, Colusa layia, and Baker’s nararretia. 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</p>	<p>Qualified biologist’s on-site survey results and submittal of survey documents; periodic on-site inspection/ monitoring</p>	<p>Prior to commencement of construction during blooming periods</p>	<p>City of Santa Rosa Planning and Economic Development Department: Building Division; USFWS and/or California Department of Fish and Wildlife (as</p>		

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<p>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 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 applicant 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 USFWS and/or 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> </ul>			applicable)		

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<ul style="list-style-type: none"> <li>• Incorporating project features designed to reduce ongoing impacts from project operation, including controlling public access to avoided special-status plant species habitat remaining on-site.</li> <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 shall be made to salvage portions of the habitat or plant populations that would 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 would 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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<p>access. At a minimum, the acreage of off-site habitat conserved shall exceed a 1:1 ratio of impacted rare plant habitat within the project site. The ratio shall increase depending on the rarity of the affected rare plant species, and the abundance of the rare plant habitat impacted.</p>					
<p><b>MM BIO-1b:</b> Implementation of the following avoidance and minimization measures would avoid or minimize potential effects to migratory birds and habitat in and adjacent to the project site. These measures shall be implemented for construction work during the nesting season (February 15 through August 31):</p> <p>If construction or tree removal is proposed during the breeding/nesting season for migratory birds, a qualified biologist shall conduct pre-construction surveys for Cooper’s hawk, white-tailed kite, and other migratory birds within the construction area, including a 300-foot survey buffer, no more than 7 days prior to the start of ground disturbing activities in the construction area.</p> <p>If an active nest is located during pre-construction surveys, the USFWS and/or CDFW (as appropriate) shall be notified regarding the status of the nest. Furthermore, construction activities shall be restricted as necessary to avoid disturbance of the nest until it is abandoned or a qualified biologist deems disturbance potential to be minimal. Restrictions may include establishment of exclusion zones (no ingress of personnel or equipment at a minimum radius of 300 feet around an active raptor nest and 50-foot radius around an active migratory bird nest) or alteration of the construction schedule.</p> <p>A qualified biologist shall delineate the buffer using nest buffer signs, Environmentally Sensitive Area (ESA) fencing, pin flags,</p>	<p>Qualified biologist’s pre-construction survey results and submittal of survey documents; periodic on-site inspection/monitoring</p>	<p>Prior to tree removal and during nesting season (February 15 through August 31)</p>	<p>City of Santa Rosa Planning and Economic Development Department: Building Division; USFWS and/or CDFW (as applicable)</p>		

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and or flagging tape. The buffer zone shall be maintained around the active nest site(s) until the young have fledged and are foraging independently.					
<p><b>MM BIO-2:</b> To minimize impacts to existing trees to be preserved, the project applicant shall implement the following during the clearing, grading, and construction phases:</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 shall be the minimum necessary for hazard reduction, (e.g., the removal of deadwood 2 inches and larger), and clearance. The 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 by creating a tree protection zone that includes a fenced enclosure at the dripline of trees or as established by the project arborist in which no soil disturbance is permitted and activities are restricted. 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 that cannot be preserved, they shall be cut cleanly across the face of</li> </ol>	Incorporation into project design and construction documents; on-site inspection of construction site by project arborist	Prior to tree pruning and grading and during clearing, grading, and construction	City of Santa Rosa Planning and Economic Development Department: Building Division		

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<p>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.</p> <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) shall 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 250 36-inch box trees within the project site or other City-approved location or as approved.</p>					
<p><b>5. Cultural Resources and Tribal Cultural Resources</b></p>					
<p><b>MM CUL-1:</b> All ground disturbance taking place during the initial project grubbing and grading phases shall be monitored by an archaeologist and/or a tribal monitor from an appropriately affiliated tribe in order to check for the inadvertent exposure of cultural materials. The archaeologist must meet the Secretary of Interior’s Professional Qualification Standards for archaeology. Upon completion of the grading and grubbing phases, the archaeologist and/or tribal monitor will make a recommendation to the City of Santa Rosa as to whether additional monitoring is warranted. 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 the archaeologist and tribal monitor have evaluated the situation. The applicant shall include a standard inadvertent discovery clause in every</p>	<p>Qualified archaeologist’s/tribal monitor’s on-site inspection; provision of Section 15064.5 permit(s); copy of DPR 523 forms; submittal of findings and documentation</p>	<p>During initial grading/construction and in the event resources are found</p>	<p>City of Santa Rosa Planning and Economic Development Department: Building Division</p>		

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<p>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 archaeologist and appropriately affiliated tribe(s) 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 the CEQA Guidelines and tribal tradition. 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, if required.</p>					
<p><b>7. Geology and Soils</b></p>					
<p><b>MM GEO-1:</b> Design of proposed structures on the site shall be done in conformance with the seismic provisions of the latest adopted edition of the California Building Standards Code and the recommendations of the Geotechnical Investigation report by Reese &amp; Associates Consulting Geotechnical Engineers 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.</p>	<p>Approval of final grading and foundation plans by a qualified engineer</p>	<p>Prior to issuance of grading and building permits</p>	<p>City of Santa Rosa Planning and Economic Development Department: Building Division; qualified engineer</p>		

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<b>MM GEO-2:</b> Prior to the issuance of a building permit and during the foundation phases of construction, the project applicant shall consult with a geotechnical consultant to reduce potential risks of buildings planned closer than 70 feet to top of the steep slope.	Approval of final grading and foundation plans by a qualified engineer; on-site inspection	Prior to issuance of building permit and during construction	City of Santa Rosa Planning and Economic Development Department: Building Division; qualified engineer		
<b>MM GEO-3:</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 Geotechnical Investigation report by Reese & Associates Consulting Geotechnical Engineers, dated September 21, 2016. Grading measures such as over-excavation 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. Prior to issuance of a grading permit, 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 by a qualified engineer	Prior to issuance of grading and building permits	City of Santa Rosa Planning and Economic Development Department: Building Division; qualified engineer		
<b>MM GEO-4:</b> Prior to the issuance of construction and grading permits, the applicant shall adhere to the recommendations of the Geotechnical Investigation report by Reese & Associates Consulting Geotechnical Engineers, dated September 21, 2016, regarding weak, porous soils and expansive soils on-site. 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. Expansive soils can undergo significant strength and volume changes with seasonal variations in moisture content and can heave and distress lightly loaded	Submittal of records documenting completion	Prior to issuance of construction, grading, and building permits	City of Santa Rosa Planning and Economic Development Department: Building Division; qualified engineer		

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footings and slabs. 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.					
<b>13. Noise</b>					
<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 construction staging areas shall be located to create the greatest feasible distance between the staging area and noise-sensitive receptors nearest the project site.</li> <li>• The construction contractor shall ensure that 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>	<p>Recordation in contract specifications</p> <p>Periodic on-site inspection/monitoring and 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 and Economic Development Department: Building Division</p>		

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<b>17. Transportation</b>					
<b>MM TRANS-1:</b> Prior to issuance of the first certificate of occupancy, the applicant shall add edge line striping on Thomas Lake Harris Drive for a distance of approximately 300 feet to the north and south of Gullane Drive. This would reduce speeds on Thomas Lake Harris Drive and ensure provision of adequate sight distance at Gullane Drive. The City of Santa Rosa shall review and approve the striping plan.	Identification on-site circulation plans and site plan review and approval; 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		

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