

**EXHIBIT A: MITIGATION AND MONITORING PROGRAM
Kelly Farm Mitigation Bank Project**

Existing Regulation or Mitigation Measure	Implementation Procedure	Monitoring Responsibility	Monitoring / Reporting Action & Schedule	Monitoring Compliance Record (Name/Date)
Existing Regulations and BMPs				
<p>Implementation of Air Quality Control Measures during Construction</p> <p>To limit dust, criteria pollutants, and precursor emissions associated with the construction activity, the following Bay Area Air Quality Management District (Bay Area Air District) 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"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas and unpaved access roads) shall be watered two times per day; • All haul trucks transporting soil, sand, or other loose material off-site shall be covered or shall have at least two feet of freeboard; • 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; • All vehicle speeds on unpaved areas shall be limited to 15 miles per hour; • All paving shall be completed as soon as possible after trenching work is finished; • 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 CCR Title 13, Section 2485). Clear signage shall be provided for construction workers at all access points; • 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; • 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. 	<p>Incorporate into final plans and specifications.</p>	<p>City of Santa Rosa</p>	<p>Verify in specifications prior to bid. Check jobsite compliance daily or as necessary.</p>	
<p>Implementation of Stormwater Pollution Prevention Plan</p> <p>The project will seek coverage under State Water Resources Control Board (Water Board) Order No. 2009 0009 DWQ, Waste Discharge Requirements for Discharges of Storm Water Runoff Associated with Construction and Land Disturbance Activities. The City will submit permit registration documents (notice</p>	<p>Incorporate into final plans and specifications.</p>	<p>City of Santa Rosa</p>	<p>Verify in plans and specifications, prior to bid.</p>	

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<p>of intent, risk assessment, site maps, stormwater pollution prevention plan (SWPPP), annual fee, and certifications) to the Water Board. The SWPPP will address pollutant sources, best management practices, and other requirements specified in the Order. The SWPPP will include erosion and sediment control measures, and dust control practices to prevent wind erosion, sediment tracking, and dust generation by construction equipment. A Qualified SWPPP Practitioner will oversee implementation of the Project SWPPP, including visual inspections, sampling and analysis, and overall compliance.</p>			<p>Check jobsite compliance daily or as necessary.</p>	
<p>Use of Herbicides As part of the vegetation management at the Project site, the use of herbicides may be necessary. Prior to the use of any herbicides, the City would prepare a State of California Department of Fish and Wildlife Pesticide Use Recommendation Form 880 and submit to CDFW's Pest Control Advisor for approval. Herbicide types, application rates, application method and equipment used, and required conditions specified in Form 880 would be adhered to.</p>	<p>Incorporate requirements into Interim and/or Long-Term Management Plan.</p>	<p>City of Santa Rosa</p>	<p>Verify submittal prior to each use.</p>	
Mitigation Measures				
<p>BIO-1: Protect CTS and WPT during Construction 1. <u>Prepare CTS and WPT Salvage and Relocation Plan</u> A qualified biologist shall prepare a CTS and WPT Salvage and Relocation Plan prior to the start of construction. The CTS and WPT Salvage and Relocation Plan shall include, but not be limited to, a discussion (and map) of the portion of the work area which represents potential breeding and upland habitat for CTS and northwestern pond turtle; those areas within 1.26 miles of known breeding habitat for CTS; an identification of the survey, hand excavation, capture handling, and relocation methods; identification of relocation area(s); and identification of a wildlife rehabilitation center or veterinary facility that routinely evaluates or treats amphibians. The CTS and WPT Salvage and Relocation Plan shall be submitted to CDFW for approval prior to the beginning of construction. Construction within the work area may not proceed until the CTS and WPT Salvage and Relocation Plan is approved in writing by CDFW. Only approved Designated Biologist(s) are authorized to capture and handle CTS or WPT.</p> <p>2. <u>Survey Construction Area Prior to Construction</u> No more than 14 days prior to starting construction, a qualified biologist shall survey the work area(s) located within that portion of the construction footprint that has identified habitat features suitable for CTS or northwestern pond turtle.</p>	<p>Prepare Salvage and Relocation Plan</p> <p>Conduct Pre-Construction Survey</p> <p>Conduct Construction Worker Training</p>	<p>City of Santa Rosa</p>	<p>Verify Salvage and Relocation Plan is prepared prior to start of construction</p> <p>Verify survey is done prior to construction</p> <p>Conduct training prior to any ground disturbance</p>	

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<p>These surveys shall provide 100 percent visual coverage of the work area(s) and a 50-foot buffer zone. If any CTS are found within the work area or 50-foot buffer zone(s), the Designated Biologist(s) shall relocate them from the work area or buffer zone(s) in accordance with the CTS Salvage and Relocation Plan. Any potentially suitable burrows which cannot be avoided by at least a 50-foot buffer will be subject to excavation or other inspection according to the terms of the approved CTS and WPT Salvage and Relocation Plan. The Designated Biologist(s) shall submit a report documenting the results of the pre-construction surveys to CDFW within five days after performing the surveys.</p> <p>3. <u>Construction Personnel Awareness Training</u></p> <p>All construction personnel involved in the Project shall attend environmental awareness training prior to the commencement of potential Project disturbance activities. The training shall be conducted by a qualified biologist and shall involve the presentation of sensitive species and habitats documented or potentially occurring in the Project site. The training should include handouts that describe each resource with respect to listing status, habitat preferences, distinguishing physical characteristics, causes of its decline, and potential protection and avoidance measures. The handout shall be distributed among construction personnel and shall include photographs of the resources in order to facilitate identification by the personnel. Personnel shall be directed to contact the on-site biologist or designated staff if any of these species are observed</p>				
<p>BIO-2: Protect Nesting Birds during Construction</p> <p>The City shall implement the following measures to reduce potential impacts to nesting birds during construction. If construction activities commence anytime during the nesting/breeding season of raptors or other migratory birds (typically February 1 through August 31) a pre-construction bird nesting survey shall be conducted by a qualified biologist within one week of the commencement of construction activities. If there is a two-week or longer lapse in construction activities, the pre-construction survey will be repeated.</p> <p>If active nests are found in areas that could be directly affected or are within 500 feet of construction and would be subject to prolonged construction-related noise, a no-disturbance buffer zone should be created around active nests during the breeding season or until a qualified biologist determines that all young have fledged. The size of the buffer zone and types of construction activities restricted within it should be determined through coordination with the CDFW, taking into account factors such as the following:</p> <ul style="list-style-type: none"> Noise and human disturbance levels at the construction site at the time of the survey and the noise and disturbance expected during the construction activity; 	<p>Conduct preconstruction nesting surveys if grading or vegetation removal occurs during nesting season.</p> <p>Implement recommended buffers and protection measures as necessary.</p>	<p>City of Santa Rosa</p>	<p>Verify surveys are conducted within 7 days of start of construction.</p> <p>Verify disturbance buffers and fencing requirements are installed, if needed.</p>	

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<ul style="list-style-type: none"> Distance and amount of vegetation or other screening between the construction site and the nest; and Sensitivity of individual nesting species and behaviors of the nesting birds. 				
<p>BIO-3: Protect American Badger during Construction</p> <p>The City shall implement the following the measure to reduce potential impacts to American badger during construction. A pre-construction survey for potential den sites shall be conducted by a qualified biologist to confirm the locations of American badger within the Project site. This survey shall be conducted no more than four weeks before commencement of initial ground disturbance activities. If an occupied den is found (and if young are not present), then any badgers present shall be removed from the den either by trapping or the use of exclusionary devices. Prior to implementation, the removal method shall be approved by CDFW. If trapped, the badgers shall be moved to other suitable habitat. Once any badgers are trapped or excluded, the dens shall be excavated by hand and refilled to prevent reoccupation. Exclusion shall continue until the badgers are successfully excluded from the site, as determined by a qualified biologist. Badgers shall not be relocated if it is determined by the biologists that young are or may be present.</p>	<p>Conduct preconstruction survey for potential den sites.</p> <p>Remove present badgers from the den with an approved method and relocate them.</p>	<p>City of Santa Rosa</p>	<p>Verify surveys are conducted within 4 weeks of start of ground disturbance activities.</p> <p>Exclude and relocate badgers until they are successfully excluded from site.</p>	
<p>BIO-4: Protect Roosting Bats During Construction</p> <p>A qualified biologist shall conduct a roosting bat habitat evaluation prior to the commencement of construction activities. The evaluation shall determine if any trees that are located near the work sites provide potential bat roosting habitat. If suitable roost trees or an active roost are confirmed, then a site-specific bat protection plan shall be developed by a qualified biologist to prevent disturbance of an active maternity or hibernation roost.</p> <p>Potential measures to protect a roost include not allowing work directly under or adjacent to the roost, not restricting airspace access to and from the roost, avoiding clearing and grubbing within 100 feet of the roost, not allowing use of combustion equipment such as generators, pumps, and vehicles under or adjacent to the roost, and not allowing personnel directly under the colony during seasons when it is in use.</p>	<p>Evaluate habitat to determine if potential roosting bat habitat is present.</p> <p>Prepare and implement site-specific bat protection plan, if needed.</p>	<p>City of Santa Rosa</p>	<p>If no habitat identified, no further action is needed.</p> <p>Verify bat protection plan measures have been implemented within 100 feet of habitat prior to start of construction, if needed.</p>	
<p>CR-1: Protect Unknown Archaeological and Historical Resources during Construction</p> <p>If potential archaeological or historical resources are uncovered during construction, the City shall immediately halt work and construction workers shall avoid altering the materials and their context. Project personnel shall not collect</p>	<p>Stop work if an historical resource is found.</p>	<p>City of Santa Rosa</p>	<p>Immediately engage qualified archaeologist to evaluate find.</p>	

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<p>cultural materials. Prehistoric archaeological materials might include a concentration of 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. Historic-era materials might include buried adobe, stone, brick, or concrete footings or walls; filled privies or wells; or concentrated deposits of metal, glass, and/or ceramic.</p> <p>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 (e.g., preserved in place or left in an undisturbed state). In considering any suggested measures proposed by the professional 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>	<p>Obtain professional evaluation from archaeologist to determine if resource qualifies as historic or unique.</p> <p>Identify avoidance or other appropriate measures, if needed.</p>		<p>Implement avoidance or other appropriate measures prior to commencing ground disturbance within and adjacent to find.</p>	
<p>CR-2: Protect Human Remains if Encountered during Construction</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 § 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</p>	<p>Incorporate requirements into final plans and specifications.</p>	<p>City of Santa Rosa</p>	<p>Halt work if human remains or associated grave goods are found.</p> <p>Immediately notify Coroner.</p> <p>Notify Native American Heritage Commission if they are of Native American origin.</p>	

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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>TCR-1: Protect Unknown Tribal Cultural Resources</p> <p>If previously unknown tribal cultural 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. The City shall notify the California Native American tribes culturally affiliated with the project area. The City, in coordination with Native American tribes, shall determine if the resource qualifies as a tribal cultural resource under CEQA. If it does, then all work must remain stopped in the immediate vicinity to allow evaluation of any materials. The City shall ensure that qualified resources are avoided, protected in place, or moved to an appropriate location in accordance with the requests of Native American tribes, to the extent feasible. Work may proceed on other parts of the project while mitigation for tribal cultural resources is being carried out.</p>	<p>Incorporate compliance requirements into specifications.</p> <p>Notify Native American tribe associated with project area to determine if resource qualifies under CEQA.</p>	<p>City of Santa Rosa</p>	<p>Implement avoidance and protection measures, if needed and feasible, prior to commencing construction within and adjacent to the find.</p>	