Mitigation Monitoring and Reporting Program

Sandell Distribution Warehouse Building 2
380 Blodgett Street

Mitigation Measure	Implementing Responsibility	Monitoring Responsibility	Monitoring Schedule	Verification
AIR QUALITY				
AQ-1: Latest BAAQMD recommended Best Management Practices (BMPs) to control for fugitive dust and exhaust during all construction activities shall be incorporated into all demolition and construction plans to require implementation of the following: 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered three times per day using recycled water. 2. All haul trucks transporting soil, sand, or other loose material shall be covered. 3. 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. 4. All vehicle speeds on unpaved roads shall be limited to 15 mph. 5. 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. 6. 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 California Code of Regulations [CCR]). Clear signage shall be provided	Project Applicant	Cotati Community Development Department Cotati City Engineer	Prior to issuance of grading permit Ongoing throughout project construction	

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for construction workers at all access points. 7. 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 working condition prior to operation. 8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency 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.				
BIOLOGICAL RESOURCES				
BIO-1. Best Management Practices. Best management practices should be employed to prevent discharge or spilling of materials or liquids into the adjacent seasonal wetlands. The 25-foot setback (or adjusted setback) should be demarcated using either orange construction fence and/or wildlife exclusion fence described in MM BIO-5. No refueling of vehicles or equipment shall occur outside of the project footprint.	Project Applicant	Cotati Community Development Department	Prior to issuance of grading permit Ongoing through construction	
BIO-2 Nesting Bird Surveys. If construction begins during the nesting bird season between February 1 and August 31, the following is recommended to ensure potentially significant impacts to migratory nesting birds and raptors (including WTK) are avoided: • Pre-construction nesting bird surveys should be performed within the project study area and up to 500 feet of proposed activities no more than 7 days prior to construction. If a lapse of 7 days or	Project Applicant Project Biologist	Cotati Community Development Department CDFW	Prior to issuance of ground disturbance and continuing over the course of the Project	

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more in construction occurs, another survey shall be conducted. • If nests are found, a no-disturbance buffer should be placed around the nest until young have fledged or the nest is determined to be no longer active by the biologist. The size of the buffer may be determined by the biologist based on species, ambient conditions, and proximity to project-related activities. Avoidance buffers for raptors shall be a minimum of 500 feet unless otherwise approved in writing by CDFW. Larger buffers are not likely necessary due to ambient conditions. Any active nests shall be monitored by a qualified biologist daily at a minimum for the first week to ensure the buffer is adequate to avoid nest disturbance, then weekly thereafter.				
BIO-3: **Burrowing Owl.** A qualified biologist shall follow the California Department of Fish and Game (now CDFW) 2012 Staff Report on Burrowing Owl Mitigation (CDFW 2012 Staff Report) habitat assessment and survey methodology prior to project activities occurring during the burrowing owl wintering season from September 1 to January 31. If work is initiated outside of the wintering season, no surveys are needed. The habitat assessment and surveys shall encompass a sufficient buffer zone to detect owls nearby that may be impacted. Time lapses between surveys or project activities shall trigger subsequent surveys, as determined by a qualified biologist, including but not limited to a final survey within 24 hours prior to ground disturbance and before construction equipment mobilizes to the Project area. The qualified biologist shall have a minimum of two years of experience implementing the CDFW 2012 Staff Report survey methodology	Project Applicant Project Biologist	Cotati Community Development Department	Prior to issuance of grading permit Ongoing through construction	

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resulting in detections. Detected burrowing owls shall be avoided pursuant to the buffer zone prescribed in the CDFW 2012 Staff Report, unless otherwise approved in writing by CDFW, and any eviction plan shall be subject to CDFW review. Please be advised that CDFW does not consider eviction of burrowing owls (i.e., passive removal of an owl from its burrow or other shelter) as a "take" avoidance, minimization, or mitigation measure: therefore, offsite habitat compensation shall be included in the eviction plan. Habitat compensation acreages shall be approved by CDFW, as the amount depends on site-specific conditions, and completed before project construction. It shall also include placement of a conservation easement and preparation and implementation of a long-term management plan.				
BIO-4: Section 2081 Permitting and Compensatory Mitigation. At minimum, the Applicant shall consult with the CDFW and obtain a Section 2081 Incidental Take Permit (ITP) for CTS prior to commencing construction-related activities on the project site. Compensatory mitigation shall be provided at a ratio of 2:1 for all permanent impacts, and at 1:1 for any temporary effects. Mitigation shall be purchased at a CDFW-approved conservation bank or through a CDFW- approved off-site mitigation site prior to issuance of the ITP. Copies of the CDFW's 2081 ITP and copies of USFWS concurrence or Minor Habitat Conservation Plan (HCP) if required shall be provided to the City of Cotati prior to commencement of grading or other construction activities on the site. The Applicant shall conform with all of the measures set forth in the ITP and/or HCP if required, including any off-site compensatory mitigation requirements (e.g., construction of CTS breeding pools in upland habitat, if required).	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist USFWS CDFW	Prior to grading and construction activities	

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BIO-5: **Wildlife Exclusion Fencing (WEF).** Prior to the start of construction, WEF will be installed at the edge of the project footprint in all areas where CTS could enter the construction area. The location of the fencing shall be determined by the onsite project manager and the CDFW-approved biologist in cooperation with CDFW prior to the start of staging or surface disturbing activities. A conceptual fencing plan shall be submitted to CDFW for review and approval prior to WEF installation. The WEF shall remain in place throughout the duration of the project and shall be inspected weekly and fully maintained. Repairs to the WEF shall be made within 24 hours of discovery. Upon project completion the WEF shall be completely removed and replaced with permanent barrier fencing.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Prior to grading and construction activities	
BIO-6. **Relocation Plan.** A Relocation Plan shall be prepared and be consistent with the Guidelines for the relocation of California tiger salamander (*Ambystoma californiense*) (Shaffer et. al. 2008). The Relocation Plan shall contain the name(s) of the Service-approved biologist(s) to relocate CTS, method of relocation (if different than number 3 below), a map, and description of the proposed release site(s) and burrow(s), and written permission from the landowner to use their land as a relocation site.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist USFWS CDFW	Prior to grading and construction activities	
BIO-7: **Protocol for Species Observation, Handling, and Relocation**. Only Service-approved biologists shall participate in activities associated with the capture, handling, relocation, and monitoring of CTS. If a CTS is encountered, work activities within 50 feet of the individual shall cease immediately and the Onsite Project Manager and Service-approved biologist shall be notified. Based on the professional judgment of the Service-approved biologist, if	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist USFWS CDFW	Prior to issuance of a grading permit Ongoing throughout project construction	

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project activities can be conducted without harming or injuring the individual(s), it may be left at the location of discovery and monitored by the Service-approved biologist.				
BIO-8: **Biological Monitors.** Qualified biological monitor(s) will be on site each day during all earth moving activities. The biological monitor(s) shall conduct clearance surveys at the beginning of each day and regularly throughout the workday when construction activities are occurring that may displace, injure, or kill CTS through contact with workers, vehicles, and equipment. Where feasible and only on a case-by-case basis, rodent burrows and other ground openings suspected to contain CTS that would be destroyed from project activities may be carefully excavated with hand tools. Pre-soaking the area prior to ground disturbance may also increase emergence of the species for translocation. Before the start of work each day, the biological monitor will check for animals under all equipment such as vehicles and stored pipes. The biological monitor will check all excavated steep-walled holes or trenches greater than one foot deep for any CTS. CTS will be removed by the biological monitor and relocated according to the Relocation Plan. To prevent inadvertent entrapment of animals during construction, all excavated, steep-walled holes or trenches more than 6 inches deep will be covered with plywood (or similar materials) that leave no entry gaps at the close of each working day or provided with one or more escape ramps constructed of earth fill or wooden planks. The	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Ongoing throughout project construction	

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Biological Monitor shall inspect all holes and trenches at the beginning of each workday and before such holes or trenches are filled. All replacement pipes, culverts, or similar structures stored in the project footprint overnight will be inspected before they are subsequently moved, capped, and/or buried				
BIO-9. **Biological Monitoring Records**. The biological monitor(s) shall maintain monitoring records in accordance with applicable permits. All monitoring records shall be provided to the applicable agency(ies) within 30 days of the completion of monitoring work.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Ongoing throughout project construction	
BIO-10. **Proper Use of Erosion Control Materials.** Plastic or synthetic monofilament netting will not be used in order to prevent CTS from becoming entangled, trapped, or injured. This includes products that use photodegradable or biodegradable synthetic netting, which can take several months to decompose. Acceptable materials include natural fibers such as jute, coconut, twine, or other similar fibers.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Ongoing throughout project construction	
BIO-11. **Vegetation Removal.** A Service-approved biologist will be present during all vegetation clearing and grubbing activities. Grasses and weedy vegetation should be mowed to a height no greater than 6 inches prior to ground-disturbing activities. All cleared vegetation will be removed from the project footprint to prevent attracting animals to the project site. Prior to vegetation removal, the Service-approved biologist shall thoroughly survey the area for CTS. Once the qualified biologist has thoroughly surveyed the area, clearing and grubbing may continue without further restrictions on equipment; however, the qualified biologist shall remain onsite to monitor for CTS until all clearing and grubbing activities are complete.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Ongoing throughout project construction	

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BIO-12. **Nighttime Activities.** Construction and ground disturbance will occur only during daytime hours and will cease no less than 30 minutes before sunset and will not begin again prior to no less than 30 minutes after sunrise.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Ongoing throughout project construction	
BIO-13. **Trash.** All foods and food-related trash items will be enclosed in sealed trash containers at the end of each day and removed from the site every three days.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Ongoing throughout project construction	
BIO-14. **Wet Weather Restrictions.** If work is proposed to occur during the wet weather season between October 15 and April 15, no grading shall be permitted when a ¼-inch or more precipitation is forecasted within 72 hours to avoid impacts to CTS that may be leaving estivation habitat and moving to nearby breeding sites. Work shall be suspended until at least 24 hours following a major rain event.	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	Prior to any grading or construction Ongoing throughout project construction	
BIO-15. **Revegetation of Temporarily Disturbed Vegetation within the Wetland Setback**. The 0.08 acre of temporarily disturbed vegetation will be revegetated upon completion of the Project. After all construction related debris, including stormwater pollution and prevention materials, are removed, a 4-inch layer of imported topsoil will be spread over the disturbed area to ensure that there are sufficient nutrients to facilitate and maintain plant growth. After topsoil has been placed, a seed mix composed of plants typically found in/near wetlands in the project vicinity (Table 2) will be hand broadcasted over the topsoil. A thin layer of light mulch or organic compost will be broadcast over the seed to protect it from predators and wind and stormwater erosion. Revegetation will occur in late	Project Applicant Project Biologist	Cotati Community Development Department Project Biologist	At completion of project	

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October so that the seeds do not become spoiled by late summer/early fall heat and benefit from the rainy season.				
CULTURAL RESOURCES				
CUL-1: A preconstruction cultural resource awareness training shall be held prior to commencement of ground-disturbing activities in order to familiarize the team with the potential to encounter prehistoric artifacts or historic-era archaeological deposits, the types of archaeological material that could be encountered within the project area, and procedures to follow in the event that archaeological deposits and/or artifacts are observed during construction. Historic-era resources potentially include all by-products of human land use greater than 50 years of age, including alignments of stone or brick, foundation elements from previous structures, minor earthworks, brick features, surface scatters of farming or domestic type material, and subsurface deposits of domestic type material (glass, ceramic, etc.). Artifacts that are typically found associated with prehistoric sites in the area include humanly modified stone, shell, bone or other materials such as charcoal, ash and burned rock that can be indicative of food procurement or processing activities. Prehistoric domestic features include hearths, fire pits, house floor depressions and mortuary features consisting of human skeletal remains.	Project Applicant/Contractor Qualified Archeologist	Cotati Community Development Department	Ongoing throughout project construction	
CUL-2: If during the course of ground disturbing activities, including, but not limited to excavation, grading and construction, a potentially significant prehistoric or historic resource is encountered, all work within a 100 foot radius of the find (or as otherwise directed by a qualified archeologist) shall be suspended for a	Project Applicant/Contractor Qualified Archeologist	Cotati Community Development Department	Ongoing throughout project construction	

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time deemed sufficient for a qualified and city-approved archeologist to adequately evaluate and determine significance of the discovered resource, confer with tribal representative, as appropriate, and provide treatment recommendations. Should a significant cultural resource be identified, a qualified archaeologist shall prepare a resource mitigation plan and monitoring program to be carried out during all construction activities.				
CUL-3 In the event of the accidental discovery or recognition of any human remains, CEQA Guidelines Section 15064.5; Health and Safety Code Section 7050.5; Public Resources Code Section 5097.94 and Section 5097.98 shall be followed. If during the course of project development there is accidental discovery or recognition of any human remains, the following steps shall be taken: 1. There shall be no further excavation or disturbance within 100 feet of the remains until the Sonoma County Coroner is contacted to determine if the remains are Native American and if an investigation of the cause of death is required. If the coroner determines the remains to be Native American, the coroner shall contact the NAHC within 24 hours, and the NAHC shall identify the person or persons it believes to be the most likely descendant of the deceased Native American. The most likely descendant may make recommendations for the excavation work within 48 hours, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98. 2. Where the following conditions occur, the landowner	Project Applicant/Contractor Qualified Archeologist	Cotati Community Development Department	Ongoing throughout project construction	

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or authorized representative shall rebury the Native American human remains and associated grave goods with appropriate dignity either in accordance with the recommendations of the most likely descendant or on the project site in a location not subject to further subsurface disturbance: • The NAHC is unable to identify a most likely descendent or the most likely descendent failed to make a recommendation within 48 hours after being given access to the site. • The descendant identified fails to make a recommendation. • The landowner or authorized representative rejects the recommendation of the descendant, and mediation by the NAHC fails to provide measures acceptable to the landowner.				
GEOLOGY AND SOILS				
GEO-1: Prior to issuance of a grading permit, a site-specific geotechnical investigation with subsurface exploration and laboratory testing shall be conducted to provide design-level recommendations and criteria for the project (pursuant to the recommendations of the Geotechnical Feasibility Evaluation prepared by Reese and Associates on March 26, 2021). The geotechnical investigation report shall be prepared and submitted to the City Engineer for review. The site-specific geotechnical investigation shall include, but not be limited to, the following: conduct subsurface exploration to confirm the absence of loose, saturated granular layers; and evaluate and provide recommendations for expansive soil mitigation measures. All recommendations of the site-specific geotechnical investigation report shall be incorporated into the project design, construction	Project Applicant Geotechnical Engineer	Cotati Community Development Department Cotati City Engineer	Prior to issuance of grading permit Ongoing throughout project construction	

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documents and improvement plans, or as otherwise determined by the City Engineer and/or Chief Building Official. The project's geotechnical engineer shall inspect the construction work and shall certify to the City, prior to issuance of a certificate of occupancy, that the improvements have been constructed in accordance with the geotechnical investigation report.				
GEO-2: In the event that paleontological resources, including individual fossils or assemblages of fossils, are encountered during construction activities all ground disturbing activities shall halt and a qualified paleontologist shall be procured to evaluate the discovery and make treatment recommendations.	Project Applicant Paleontologist	Cotati Community Development Department	Ongoing throughout project construction	
GEO-3: The applicant shall comply with erosion and sediment control standards as stipulated in Chapter 14.36 of the Cotati Municipal Code which requires, amongst other things, an Erosion and Sediment Control Plan prepared by a Civil Engineer or other qualified professional that outlines appropriate measures to minimize soil erosion and sedimentation and that complies with design and construction standards contained in the City's Municipal Code.	Project Applicant	Cotati Community Development Department Cotati City Engineer	Ongoing throughout project construction	
<u>Hazards and Hazardous Materials</u>				
HAZ-1: Any buried holding tanks including septic systems shall be properly decommissioned in accordance with applicable regulations established by the County of Sonoma (Permit & Resource Management Department). Removal of underground tanks shall be immediately followed by backfill in accordance with Engineering recommendations. Materials shall be properly disposed of at permitted facilities.	Project Applicant/Contractor	Cotati Community Development Department	Prior to issuance of a grading permit	
HAZ-2: In the event that the project involves onsite storage of potentially hazardous materials in sufficient	Project Applicant/Contractor	Cotati Community Development	Prior to issuance of a grading permit	

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quantities, a Hazardous Materials Business Plan (HMBP) shall be prepared and submitted to the Sonoma County CUPA agency for review and approval. The applicant shall fully comply with all provisions of a HMBP should one be required.		Department CUPA	Ongoing throughout project construction	
HYDROLOGY AND WATER QUALITY HYDRO-1: In accordance with the National Pollution Discharge Elimination System regulation, the applicant shall prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) prior to construction. The SWPPP shall address erosion and sediment controls, proper storage of fuels, temporary erosion control including fiber rolls, staked straw bales, geofabric, and sandbag, and identification for use and cleanup of hazardous materials. Sediment shall be retained onsite by a system of sediment basins, traps, or other appropriate measures. A Notice of Intent, fees, and other required documentation shall be filed with the Regional Water Quality Control Board. During construction, a monitoring report shall be conducted weekly during dry conditions and three times a day during storms that produce more than 1/2" of precipitation.	Project Applicant	Cotati Community Development Department RWQCB	Prior to construction activities Ongoing throughout project construction	
NOISE NOI-1: All construction activities shall be required to comply with the following and be noted accordingly on construction plans: 1. Noise-generating construction activities, including truck traffic coming to and from the construction site for any purpose, shall be limited to between the hours of 7:00 am and 7:00 pm on weekdays and 9:00 am and 5:00 pm on Saturdays (if allowed through specific project conditions of approval). No	Project Applicant/Contractor	Cotati Community Development Department	Ongoing throughout project construction	

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construction shall occur on Sundays or holidays. 2. All equipment driven by internal combustion engines shall be equipped with mufflers, which are in good condition and appropriate for the equipment. 3. The construction contractor shall utilize "quiet" models of air compressors and other stationary noise sources where technology exists. 4. At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences. 5. Unnecessary idling of internal combustion engines shall be prohibited. 6. Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction. 7. The required construction-related noise mitigation plan shall also specify that haul truck deliveries are subject to the same hours specified for construction equipment.				
TRIBAL CULTURAL RESOURCES TCR-1: See Cul-1 through Cul-3				