

**Mitigation Monitoring and Reporting Program
City of Cloverdale
Bi' du Khaale Housing Project**

Impact	Mitigation Measure	Implementation Responsibility	Monitoring/ Reporting Responsibility	Timing
Biological Resources	BIO-1: Before any work occurs in the project area, including grading and equipment staging, all construction personnel shall participate in an environmental awareness training regarding special-status species and sensitive habitats present in the project area offered by a qualified biologist. If new construction personnel are added to the project, they must receive the mandatory training before starting work. As part of the training, an environmental awareness handout shall be provided to all personnel that describe and illustrates sensitive resources to be avoided during project construction.	Project Contractor	City of Cloverdale and Qualified Biologist	Prior to construction
Biological Resources	BIO-2: If construction activities begin during the nesting season (February 1 to August 31), a qualified biologist shall conduct a preconstruction survey for active nests in suitable nesting habitat within 500 feet of the construction area for nesting raptors and migratory birds. Areas adjacent to the project area that are inaccessible due to private property restrictions shall be surveyed using binoculars from the nearest vantage point. The survey shall be conducted by a qualified biologist no more than seven days prior to the onset of construction. If no active nests are identified during the pre-construction survey, no further mitigation is necessary. If at any time during the nesting season construction stops for a period of two weeks or longer, pre-construction surveys shall be conducted prior to construction resuming.	Project Contractor	City of Cloverdale and Qualified Biologist	Prior to construction

	<p>If active nests are found during the survey, the project proponent shall implement mitigation measures to ensure that the species would not be adversely affected, which would include establishing a no-work buffer zone, as approved by the California Department of Fish and Wildlife (CDFW), around the active nest.</p> <p>If active nests are found on or within 500 feet of the project area, then the project proponent shall establish no disturbance buffers for active nests of 150 feet for small migratory bird species and 250 feet, or as specified, for raptors and larger birds, until the breeding season has ended, or until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival.</p> <p>If construction activity is required within the buffer, the nest(s) shall be monitored by a qualified biologist during all construction activities. If the biologist determines that the activity would impact the nest, the biologist shall have the authority to stop work. If the activity is determined to not be disturbing nesting activity, it may continue under supervision of the biologist. Completion of nesting and fledging activities shall be determined by the qualified biologist.</p>			
<p>Biological Resources</p>	<p>BIO-3: Prior to any construction, a qualified bat biologist shall conduct a pre-construction survey for roosting bats in trees to be removed or pruned and structures to be demolished. If no roosting bats are found, no further action is required. If a bat roost is found, the following measures shall be implemented to avoid impacts on roosting bats.</p> <p>If active maternity roosts are found in trees or structures that shall be removed or demolished as part of</p>	<p>Project Contractor</p>	<p>City of Cloverdale and Qualified Bat Biologist</p>	<p>Prior to Construction</p>

	<p>construction, tree removal or demolition of that structure shall commence before maternity colonies form (generally before March 1) or after young are flying (generally by July 31). Active maternal roosts shall not be disturbed.</p> <p>If a non-maternal roost of bats is found in a tree or structure to be removed or demolished as part of construction, the individuals shall be safely evicted, under the direction of the qualified bat biologist with approval from the California Department of Fish and Wildlife (CDFW). Removal of the tree or demolition of the structure should occur no sooner than two nights after the initial minor site modification (to alter airflow), under guidance of the qualified bat biologist. The modifications shall alter the bat habitat, causing bats to seek shelter elsewhere after they emerge for the night. On the following day, the tree or structure may be removed, in presence of the bat biologist. If any bat habitat is not removed, departure of bats from the construction area shall be confirmed with a follow-up survey prior to start of construction.</p>			
<p>Biological Resources</p>	<p>BIO-4: Prior to any ground disturbance in annual grassland or oak woodland habitat, a qualified plant biologist shall conduct a rare plant survey in the appropriate season(s) for the plant species identified as having a medium or higher potential to occur within the impact area, as follows:</p> <ul style="list-style-type: none"> • <i>Calycadenia macrantha</i> (Small-flowered calycadenia): June to September blooming period • <i>Kopsiopsis hookeri</i> (Small groundcone): April to August blooming period 	<p>Project Contractor</p>	<p>City of Cloverdale and Qualified Plant Biologist</p>	<p>Prior to Construction</p>

	<ul style="list-style-type: none"> • <i>Hemizonia congesta</i> ssp. <i>Congesta</i> (Congested-headed hayfield tarplant): April to October blooming period • <i>Tracyina rostrate</i> (Beaked tracyina): May to June blooming period <p>Surveys will be conducted following the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i> (CDFW, 2018). If special-status plant species are found, then the project proponent shall prepare a Transplantation and Monitoring Plan in coordination with the California Department of Fish and Wildlife (CDFW). The Transplantation and Monitoring Plan will be subject to review and approval by CDFW prior to the commencement of any construction activities within the special-status plant area. This plan will describe the intent and anticipated success of transplanting, and specify success criteria for transplanted plants and related long-term protection and management of transplanted plants.</p>			
<p>Biological Resources</p>	<p>BIO-5: Due to the proposed impacts to potentially jurisdictional waters, a Section 404 CWA permit through the U.S. Army Corps of Engineers (USACE), a Section 401 Water Quality Certification from the North Coast Regional Water Quality Control Board (NCRWQCB), and a Section 1602 Streambed Alteration Agreement from the California Department of Fish and Wildlife (CDFW) must be obtained, if required. These permits shall be obtained prior to issuance of grading permits and implementation of the project. The Applicant shall design the project such that it will not result in a loss of water of the United States or wetlands, by providing mitigation through impact avoidance, impact minimization, and/or compensatory mitigation for the impact, as determined by the resource</p>	<p>Applicant</p>	<p>City of Cloverdale</p>	<p>Prior to Construction</p>

	<p>agencies. If it is determined, through obtaining an Approved Jurisdictional Determination, that the aquatic resource features on the Site are not jurisdictional under the federal Clean Water Act, the Section 404 CWA permit shall not be required. Prior to submitting the relevant resource agency permits, the Applicant shall determine the extent of the impact on jurisdictional waters and propose mitigation as follows, to be approved by the relevant resource agencies.</p> <p>If compensatory mitigation is required, it may consist of: (1) obtaining credits from a mitigation bank; (2) making a payment to an in-lieu fee program that will conduct wetland, stream, or other aquatic resource restoration, creation, enhancement, or preservation activities; and/or (3) providing compensatory mitigation through an aquatic resource restoration, establishment, enhancement, and/or preservation activity. This final type of compensatory mitigation may be provided at or adjacent to the impact site (i.e., on-site mitigation) or at another location, usually within the same watershed as the permitted impact (i.e., off-site mitigation). The project/permit applicant retains responsibility for the implementation and success of the mitigation project.</p> <p>Evidence of compliance with this mitigation measure shall be provided prior to initiating construction and grading activities for the project.</p>			
<p>Biological Resources</p>	<p>BIO-6: Before any project ground-disturbing activity occurs, the project proponent shall ensure that temporary orange barrier fencing or site delineation rope is installed adjacent to sensitive habitat areas to be avoided, as appropriate. Construction personnel and construction activities shall avoid areas outside the fenced/roped areas. The exact location of the fence or</p>	<p>Project Contractor</p>	<p>City of Cloverdale</p>	<p>Prior to Ground-Disturbing Activities</p>

	<p>rope shall be determined by the resident engineer coordinating with a qualified biologist, with the goal of protecting sensitive biological habitat and water quality.</p> <p>The fencing material shall consist of temporary plastic mesh-type construction fence (Tensor Polygrid or equivalent) or bright poly rope secured to t-posts installed between the work area and environmentally sensitive habitat areas (e.g., waters of the U.S., oak trees to be retained, active bird nests), as appropriate. To minimize potential ground disturbance, the base of the fencing shall not be buried or keyed-in.</p>			
<p>Biological Resources</p>	<p>BIO-7: In accordance with the City of Cloverdale Tree Preservation Ordinance (2019), no protected tree shall be removed, cut down, or otherwise destroyed without a tree removal permit. This permit application shall be submitted concurrently with the overall development project application and shall be obtained prior to issuance of grading permits and implementation of the project. Per the Tree Preservation Ordinance (2019), replacement of protected trees shall be required at the following ratio:</p> <ol style="list-style-type: none"> 1. All protected trees permitted to be removed which have been determined by a qualified arborist to be in excellent or good health, and/or with moderate to good structure, shall be replaced on a one-to-one trunk diameter basis. 2. All protected trees permitted to be removed which have been determined by a qualified arborist to have moderate or marginal health, and/or with marginal structure, shall be replaced on a two-to-one trunk diameter basis. 3. All protected trees permitted to be removed and determined by a qualified arborist to have 	<p>Project Contractor</p>	<p>City of Cloverdale and Qualified Arborist</p>	<p>Prior to Issuance of Grading Permits and Implementation of the Project</p>

	<p>poor health or poor structure shall not be required to be replaced.</p> <p>Trees to be preserved shall be protected in accordance with the following guidelines, as recommended in the Arborist Report (2019):</p> <ol style="list-style-type: none"> 1. Install temporary protective fencing at the edge of the dripline, or edge of approved construction, prior to beginning grading or construction. Maintain fencing in place for duration of all construction activity in the area. 2. Maintain existing grading within the fenced portion of the dripline. Route drainage swales and all underground work outside the dripline. 3. Place a 4-inch layer of chipped bark mulch over the soil surface within the fenced dripline prior to installing temporary fencing. Maintain this layer of mulch throughout construction. 4. Prune to clean, raise, or provide necessary clearance. Prune to reduce branches that are over-loaded, over-extended, largely horizontal, arching, or have foliage concentrated near the branch ends, per International Society of Arboriculture Pruning Standards. Pruning to occur by, or under the supervision of, an Arborist certified by the International Society of Arboriculture. 			
Cultural Resources	<p>CUL-1: If prehistoric or historic-era archaeological resources are encountered, all construction activities within 100 feet will halt. The City of Cloverdale, lead agency for CEQA compliance, the U.S. Department of Housing and Urban Development (HUD), federal lead agency, and the Dry Creek Rancheria Band of Pomo Indians (DCR), will be notified. Prehistoric archaeological</p>	Project Contractor	City of Cloverdale and Qualified Archaeologist	During construction

	<p>materials might include obsidian and chert flaked-stone tools (e.g., projectile points, knives, scrapers) or toolmaking debris; culturally darkened soil ("midden") containing heat-affected rocks, artifacts, or shellfish remains; and stone milling equipment (e.g., mortars, pestles, handstones, or milling slabs); and battered stone tools, such as hammerstones and pitted stones. Historic-era materials might include deposits of metal, glass, and/or ceramic refuse. A Secretary of the Interior-qualified archaeologist will inspect the findings within 24 hours of discovery. If it is determined that the project could damage a significant archaeological resource, DCR shall re-design the proposed project to avoid any adverse effects in consultation with the City of Cloverdale and HUD. If avoidance is not feasible, a qualified archaeologist shall prepare and implement a detailed Archaeological Resources Management Plan in consultation with the State Historic Preservation Officer, HUD, and DCR.</p>			
	<p>CUL-2: In the event of discovery of any human remains during project activities, such activities within 100 feet of the find shall cease until the Sonoma County Coroner has been contacted to determine that no investigation of the cause of death is required. The Native American Heritage Commission will be contacted within 24 hours if it is determined that the remains are Native American. The Commission will then identify the person or persons it believes to be the most likely descendant from the deceased Native American, who in turn would make recommendations to the City of Cloverdale, HUD, and DCR for the appropriate means of treating the human remains and any grave goods.</p>	Project Contractor	City of Cloverdale, Sonoma County Coroner, Qualified Archaeologist, NAHC and THPOs	During construction
Geology and Soils	<p>GEO-1: The project shall comply with the recommendations pertaining to site grading and preparation, foundations, pavements, and geotechnical</p>	Project Contractor	City of Cloverdale and Professional Engineer	During construction

	<p>drainage provided in the <i>Soil Investigation – Kelly Road Housing and Commercial Projects</i> (Soils Report) and a <i>Soil Engineering Consultation and Supplemental Recommendations – Kelly Road Housing Extension</i> (Supplemental Report) prepared by Reese & Associates Consulting Geotechnical Engineers on August 13, 2019 and August 20, 2020, respectively. Prior to issuance of building permits, the Project Applicant shall submit plans to the City of Cloverdale for review and approval demonstrating project compliance with the recommendations of the Soils Report and Supplemental Report in addition to any seismic requirements of the latest adopted edition of the CBC. In addition, all soil engineering recommendations and structural foundations shall be designed by a licensed Professional Engineer. All on-site soil engineering activities shall be conducted under the supervision of a licensed Geotechnical Engineer or Certified Engineering Geologist.</p>			
	<p>GEO-2: In the event that fossils or fossil-bearing deposits are discovered during project construction, the contractor shall notify a qualified paleontologist to examine the discovery and excavations within 50 feet of the find shall be temporarily halted or diverted. The area of discovery shall be protected to ensure that fossil are not removed, handled, altered, or damaged until the Site is properly evaluated and further action is determined. The paleontologist shall document the discovery as needed, in accordance with Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 1995), evaluate the potential resource, and assess the significance of the finding under the criteria set forth in CEQA Guidelines Section 15064.5. The paleontologist shall notify the appropriate agencies to determine procedures that would be followed before</p>	<p>Project Contractor</p>	<p>City of Cloverdale and Qualified Paleontologist</p>	<p>During site preparation and construction</p>

	<p>construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important. The plan shall be submitted to the City of Cloverdale for review and approval prior to implementation.</p>			
<p>Hazards and Hazardous Materials</p>	<p>HAZ-1: In the event that construction activities would require the disturbance of the two water pipes, suspected to be composed of asbestos-containing materials, observed near the parcel border with the vineyard to the southwest, the contractor shall hire a licensed professional to test the water pipes for asbestos prior to disturbance of the water pipes. All activities involving asbestos-containing materials shall be conducted in accordance with governmental regulations, and all removal shall be conducted by properly licensed abatement contractors.</p>	<p>Project Contractor</p>	<p>City of Cloverdale</p>	<p>During construction</p>
<p>Noise</p>	<p>NOISE-1: The following measures are required in order to reduce potential construction-related impacts to a less-than-significant level:</p> <ul style="list-style-type: none"> • The construction contractor shall ensure that all internal combustion-engine-driven equipment is equipped with mufflers that are in good operating condition and appropriate for the equipment. • The construction contractor shall ensure that "quiet" models of air compressors and other stationary construction equipment are utilized where such technology exists. • The construction contractor shall, to the extent practical, locate on-site equipment staging areas to maximize the distance between construction-related noise sources and noise-sensitive receptors nearest the project site during 	<p>Project Contractor</p>	<p>City of Cloverdale</p>	<p>During construction</p>

	<p>all project construction.</p> <ul style="list-style-type: none"> • The construction contractor shall place all stationary construction equipment so that emitted noise is directed away from sensitive receptors nearest the Site. • The construction contractor shall prohibit unnecessary idling of internal combustion engines (i.e., in excess of 5 minutes). • The construction contractor shall designate a noise disturbance coordinator who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (starting too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. The construction contractor shall conspicuously post a telephone number for the disturbance coordinator at the construction site. 			
	<p>TRANS-1: The following actions shall be taken in order to reduce potential safety hazards to motorists and pedestrians:</p> <ul style="list-style-type: none"> • A "Keep Clear" pavement marking on the overpass westbound approach in the vicinity of the Interchange Overpass Connection off-ramp is required. • A "do-not-enter sign" at the proposed project southerly driveway facing South Cloverdale Boulevard is required. • No vegetation or building along the project frontage shall obstruct the visibility of vehicles entering or exiting project driveway or Dutcher Creek Road. 	<p>Project Engineer</p>	<p>City of Cloverdale</p>	<p>During Site Design</p>