

# Appendix A

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## Mitigation Monitoring and Reporting Program

## APPENDIX A

### Draft Mitigation Monitoring and Reporting Program

#### DRAFT CLOVERDALE SOUTH FIELDS PROJECT MITIGATION MONITORING AND REPORTING PROGRAM

The California Environmental Quality Act (CEQA) requires that when a lead agency adopts a Mitigated Negative Declaration (MND), it must also adopt a mitigation monitoring and reporting program (MMRP) for all required mitigation measures (CEQA Guidelines Section 15097). This MMRP identifies the monitoring program for mitigation measures identified by the IS/MND to reduce or avoid impacts associated with implementing the proposed Cloverdale South Fields Project. The MMRP shall be maintained by the Cloverdale Unified School District (CUSD).

Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
BIO-1	<p><b>Nesting Bird Survey and Avoidance.</b> A qualified biologist shall conduct a survey for nesting birds approximately two days prior to vegetation removal or ground-disturbing activities during the nesting season (March through August). The survey shall cover the limits of construction and suitable nesting habitat within 500 feet for raptors and 100 feet for other nesting birds, as feasible.</p> <p>If any active nests are observed during surveys, a qualified biologist shall establish a suitable avoidance buffer from the active nest. The buffer distance will typically range from 50 to 300 feet and shall be determined based on factors such as the species of bird, topographic features, intensity and extent of the disturbance, timing relative to the nesting cycle, and anticipated ground disturbance schedule. Limits of construction to avoid active nests shall be established in the field with flagging, fencing, or other appropriate barriers and shall be maintained until the chicks have fledged and the nests are no longer active, as determined by the qualified biologist..</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction - survey conducted</li> <li>• Throughout construction - protective measures for active nests if any</li> </ul>	<ul style="list-style-type: none"> <li>• Survey completed no more than 5 days prior to vegetation removal and/or ground disturbance</li> <li>• Limits of disturbance flagged prior to construction if nesting activities observed</li> <li>• Buffers implemented during nesting if present</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
BIO-2	<p><b>Fencing and Best Management Practice Installation.</b> Prior to the initiation of ground disturbance activities, the limits of disturbance shall be fenced and sediment and erosion control measures shall be utilized, which could include, but not be limited to: biodegradable straw wattles free of weed seeds, silt fencing, or biodegradable erosion control mats/blankets. Fencing for the dog park shall be placed a minimum of 25 feet from the edge of the adjacent riparian woodland vegetation. No construction, staging, or other ground disturbance activities shall be permitted beyond the fencing.</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction - limits of disturbance flagged and erosion control measures deployed</li> <li>• Throughout construction - flagging and erosion control measures maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Flagging and erosion control measures installed and maintained</li> </ul>
BIO-3	<p><b>Riparian Vegetation.</b> A Streambed Alteration Agreement (SAA), pursuant to Section 1602 of the California Fish and Game Code, shall be procured from the California Department of Fish and Wildlife (CDFW) prior to any disturbances to riparian vegetation associated with the intermittent drainages onsite. As part of the SAA, compensatory mitigation a no less than a 1:1 ratio may be required to offset the loss of riparian habitat. If so, a mitigation plan shall be drafted by a qualified biologist to address implementation and monitoring requirements under the SAA to ensure that the project would result in no net loss of habitat functions and values. The plan shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, performance criteria, monitoring methods, and actions to be taken in the event that the mitigation is not successful. The plan shall be approved by the District and CDFW and any required compensatory mitigation shall take place either onsite or at an appropriate off-site location as approved by the CDFW and the District at a ratio directed by the SAA..</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction - SAA obtained, vegetation survey completed, replacement planting plan prepared</li> <li>• During construction – replacement planting plan implemented</li> </ul>	<ul style="list-style-type: none"> <li>• Receipt and implementation of a SAA prior to disturbance of riparian vegetation areas</li> <li>• Replacement planting implemented consistent with SAA requirements</li> </ul>
BIO-4	<p><b>Vegetation Restoration.</b> The District shall be responsible for developing and implementing a restoration plan for temporarily impacted areas of natural vegetation. The plan shall, at a minimum, include an implementation schedule, planting/seeding plan, invasive species eradication methods,</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction – replacement planting plan prepared</li> <li>• Immediately following project construction –</li> </ul>	<ul style="list-style-type: none"> <li>• Preparation and implementation of a restoration plan</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	<p>interim and final success criteria/performance standards, estimated costs, and identification of responsible entities. Areas to be restored shall be identified by a qualified biologist as being able to feasibly support the proposed native revegetation. Feasibility of native revegetation is primarily based on suitable soils, slopes, and aspect, as well as the presence of similar vegetation adjacent to the proposed mitigation areas. Further, the restoration areas shall be preserved in perpetuity. If a substantially similar plan is required under permits issued by the U.S. Army Corps of Engineers, California Department of Fish and Wildlife, and Regional Water Quality Control Board, development and implementation of that plan would meet the requirements of this measure.</p> <p>In addition, the District shall be responsible for planting oak trees within the project property to replace the habitat values of the oak tree that is not within a riparian vegetation community and would be removed from the project site. This oak tree has a trunk diameter of 60 inches. The District shall plant one 15-gallon oak tree and one DeePot 40 oak tree OR 1-gallon oak tree for every 5 inches of trunk diameter. In total, the District shall plant 15 15-gallon oak trees and 15 DeePot 40 and/or 1 gallon oak trees.</p>			replacement planting plan implemented	<ul style="list-style-type: none"> <li>• Replacement oak tree planting completed</li> </ul>
BIO-5	<p><b>Aquatic Resource Impact Permitting and Compensation.</b> The District shall obtain an individual or nationwide permit from the Army Corps of Engineers (ACOE) prior to commencement of grading within 75 feet of any wetlands or other waters of the U.S. in the project property. As part of the ACOE permit, compensatory mitigation may be required, at a ratio to be determined by the ACOE, to offset the loss of wetland/waters habitat. If so, and as part of the permit application process, a qualified biologist shall draft a mitigation and monitoring plan to address implementation and monitoring requirements under the permit to ensure that the project would result in no net loss of habitat functions and values. The plan</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction – regulatory permits obtained including approval of compensatory mitigation plan</li> <li>• During construction - permit conditions implemented</li> </ul>	<ul style="list-style-type: none"> <li>• Regulatory permits authorizing disturbance to aquatic resources obtained prior to construction</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	<p>shall contain, at a minimum, mitigation goals and objectives, mitigation location, a discussion of actions to be implemented to mitigate the impact, monitoring methods and performance criteria, extent of monitoring to be conducted, actions to be taken in the event that the mitigation is not successful, and reporting requirements. The plan shall be approved by ACOE and compensatory mitigation shall take place either on site or at an appropriate off-site location as approved by the ACOE.</p> <p>Concurrent with the ACOE permit, the District shall also obtain a Water Quality Certification from the RWQCB, subject to the same mitigation plan requirements stated above. Any work within the bed or bank of the intermittent drainages, or within the abutting riparian woodland, would require authorization from CDFW under a California Fish and Game Code Section 1600 Streambed Alteration Agreement, as required under MM BIO-2. Trimming or removal of riparian vegetation may also require compensatory mitigation, as directed by MM BIO-3 and BIO-4.</p>				
CUL-1	<p><b>Unanticipated Cultural Resource Discovery.</b> In the event that unanticipated discoveries are encountered during project construction, all activity shall cease within 50 feet of the find until a qualified archaeologist In the event that unanticipated discoveries are encountered during project construction, all activity shall cease within 50 feet of the find until a qualified archaeologist meeting the Secretary of the Interior's Professional Qualification Standards can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (CEQA) (14 CCR 15064.5[f]; PRC Section 21082) the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under CEQA or Section 106 of the</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Throughout construction activity</li> </ul>	<ul style="list-style-type: none"> <li>• Any cultural resources discovered are evaluated and managed in accordance with state and federal standards</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	National Historic Preservation Act, additional efforts may be warranted as recommended by the qualified archaeologist. Examples of prehistoric resources may include: stone tools and manufacturing debris; milling equipment such as bedrock mortars, portable mortars, and pestles; darkened or stained soils (midden) that may contain dietary remains such as shell and bone; as well as human remains. Historic resources may include: burial plots; structural foundations; mining spoils piles and prospecting pits; cabin pads; and trash scatters consisting of cans with soldered seams or tops, bottles, cut (square) nails, and ceramics; paleontological resources.				
CUL-2	<b>Discovery of Human Remains.</b> In accordance with Section 7050.5 of the California Health and Safety Code, if potential human remains are found, all work within 100 feet shall be suspended and the county coroner shall be immediately notified of the discovery. The coroner shall provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, shall occur until a determination has been made. If the county coroner determines that the remains are, or are believed to be, Native American, they shall notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with California Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the most likely descendent (MLD) from the deceased Native American. Within 48 hours of their notification, the MLD will recommend to the lead agency their preferred treatment of the remains and associated grave goods	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Throughout construction activity</li> </ul>	<ul style="list-style-type: none"> <li>• Any human remains discovered are evaluated and managed in accordance with state and federal standards</li> </ul>
GEO-1	<b>Stormwater Pollution Prevention Plan.</b> In order to reduce runoff and erosion and minimize the potential of sedimentation as a result of the project, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) for all construction activities.	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction – erosion control measures deployed</li> <li>• Throughout construction – erosion</li> </ul>	<ul style="list-style-type: none"> <li>• Preparation and implementation of a SWPPP</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
				control measures maintained • Throughout project operation – post-construction erosion control measures maintained	
GEO-2	<b>Paleontological Resources Awareness Training.</b> Prior to commencement of grading and construction permits, the District shall retain a professional Paleontologist to train the construction workers on how to determine the presence of fossils and the procedure to follow in the event paleontological resources are discovered.	CUSD and contractors	CUSD	• Throughout construction activity	• Any paleontological resources discovered are evaluated and managed in accordance with state and federal standards
HAZ-1	<b>Spill Prevention.</b> The following measures shall be implemented prior to and during construction and shall be incorporated into project plans and specifications. <ul style="list-style-type: none"> <li>• All equipment shall be inspected by the contractor for leaks prior to the start of construction and regularly throughout project construction. Leaks from any equipment shall be contained and the leak remedied before the equipment is again used on the site.</li> <li>• Best management practices for spill prevention shall be incorporated into project plans and specifications and shall contain measures for secondary containment and safe handling procedures.</li> <li>• A spill kit shall be maintained on site throughout all construction activities and shall contain appropriate items to absorb, contain, neutralize, or remove hazardous materials stored or used in large quantities during construction.</li> <li>• Project plans and specifications shall identify construction staging areas and designated areas where equipment</li> </ul>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Before construction – hazardous materials containment measures deployed</li> <li>• Throughout construction – hazardous materials containment measures maintained</li> </ul>	<ul style="list-style-type: none"> <li>• Construction documents include hazardous materials containment measures</li> <li>• Hazardous materials containment measures implemented</li> <li>• All hazardous materials used during construction are removed from the site</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	<p>refueling, lubrication, and maintenance may occur. Areas designated for refueling, lubrication, and maintenance of equipment shall be approved by the City.</p> <ul style="list-style-type: none"> <li>• In the event of any spill or release of any chemical or wastewater during construction, the contractor shall immediately notify the City.</li> <li>• Hazardous substances shall be handled in accordance with Title 22 of the California Code of Regulations, which prescribes measures to appropriately manage hazardous substances, including requirements for storage, spill prevention and response and reporting procedures.</li> </ul>				
HAZ-2	<p><b>Cobalt Removal.</b> Prior to commencement of rough grading, the District's construction contractor shall complete targeted removal of soil at sample locations E2, E3, and E4 and confirmation soil sampling to confirm removal of the elevated cobalt (&gt;46.9 mg/kg). If serpentine rock is discovered during targeted removal or further sampling and the elevated cobalt is determined to be due to the presence of serpentine rock, then alternative mitigation shall occur following rough grading if targeted removal is determined to not be practical. The alternative mitigation would include the following remedies noted by DTSC for sites with naturally occurring asbestos (NOA) where removal is not practical.</p> <ul style="list-style-type: none"> <li>• Cover the site areas with elevated cobalt with imported clean fill materials or cover/cap specified areas with buildings, hardscape, sod, or landscaping sufficient to create a barrier and prevent future exposure pathways;</li> <li>• Develop an Operations and Maintenance Plan to ensure that the remedy remains protective in perpetuity; and</li> <li>• Record a land use covenant and/or school board resolution to restrict future activities that would create exposure to impacted soils.</li> </ul>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Prior to commencement of rough grading</li> </ul>	<ul style="list-style-type: none"> <li>• Soil with elevated cobalt concentrations removed or managed</li> </ul>
HAZ-3	<p><b>Arsenic Removal.</b> Prior to commencement of rough grading, the District's construction contractor shall complete targeted removal of soil at the sample location E1 and conduct additional soil sampling and analysis for arsenic</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Prior to commencement of rough grading</li> </ul>	<ul style="list-style-type: none"> <li>• Soil with elevated arsenic</li> </ul>



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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	<p>concentrations. The soil samples shall be taken from the walls of the excavation area for the targeted removal to confirm that the arsenic concentrations of the remaining soil are at or below the typical background concentration of up to 12 mg/kg. If samples have concentrations above the background concentration, additional soil removal shall be completed and soil sampling conducted until all samples have a maximum arsenic concentration of 12 mg/kg.</p>				<p>concentrations removed</p>
HAZ-4	<p><b>NOA Management.</b> The District shall ensure that construction contracts require that construction workers be trained to recognize potential NOA (e.g. serpentine rock) and that if grading activities uncover potential NOA, the grading and excavation work shall comply with State and local regulations for asbestos, including the California Air Resources Board Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations. This includes a requirement to notify the Northern Sonoma Air Pollution Control District within the next business day of the identification of NOA, serpentine, or ultramafic rock within the area to be graded and submittal and implementation of an asbestos dust mitigation plan within 14 days of the discovery of NOA, serpentine, or ultramafic rock. The mitigation plan shall include the following remedies where removal is not practical.</p> <ul style="list-style-type: none"> <li>• Cover the site areas with NOA with imported clean fill materials or cover/cap specified areas with buildings, hardscape, sod, or landscaping sufficient to create a barrier and prevent future exposure pathways;</li> <li>• Develop an Operations and Maintenance Plan to ensure that the remedy remains protective in perpetuity; and</li> <li>• Record a land use covenant and/or school board resolution to restrict future activities that would create exposure to impacted soils.</li> </ul>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Prior to commencement of rough grading – worker training completed</li> <li>• During construction – any potential NOA reported to Northern Sonoma Air Pollution Control District and asbestos dust mitigation plan prepared</li> </ul>	<ul style="list-style-type: none"> <li>• Any potential NOA managed in accordance with state regulations</li> </ul>
HAZ-5	<p><b>Dust Suppression.</b> The District shall ensure that construction contracts require that soils within and adjacent to areas where grading, trenching, vegetation removal, and construction traffic will occur must be watered at least twice per day sufficient to</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Construction area watering throughout construction</li> </ul>	<ul style="list-style-type: none"> <li>• Watering occurs at least twice per day</li> <li>• Dust emissions minimized</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	minimize dust emissions, consistent with Northern Sonoma County Air Pollution Control District Rule 430.				
HAZ-6	<p><b>Wildfire Fuel Management.</b> The District shall implement the following vegetation management measures to minimize wildfire fuel within and adjacent to the project site:</p> <ul style="list-style-type: none"> <li>• Vegetation shall be removed and/or pruned within 15 feet of the perimeter of the dog park, except where the vegetation is within the riparian woodland associated with the drainage located south of the dog park.</li> <li>• Vegetation within 30 feet of each athletic field and the parking lot, concession stand, and restroom area shall be mowed at least monthly between November and April and at least twice per month between May and October except where the vegetation is within the riparian woodland associated with the adjacent drainages. As an alternative to mowing, goat grazing may be used to remove vegetation. In this case, fencing shall be placed 10 feet from the edge of riparian woodland vegetation to exclude goats from those areas.</li> </ul>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Throughout project operation</li> </ul>	<ul style="list-style-type: none"> <li>• Vegetation proximate to active use areas of the site pruned and mowed and/or removed by grazing</li> </ul>
HYD-1	<p><b>Dog Park Waste Management</b> The District shall install signage, dog waste bag dispensers, and trash receptacles at the dog park. The signage shall notify all users of the dog park that they must pick up all dog waste and place it in the trash receptacles. The District shall inspect the dog park at least once per week for dog waste that has not been removed and shall collect the dog waste and place it in the trash receptacles. Dog waste bag dispensers shall be inspected and restocked weekly, and trash receptacles shall be emptied weekly.</p>	CUSD	CUSD	<ul style="list-style-type: none"> <li>• Throughout project operation</li> </ul>	<ul style="list-style-type: none"> <li>• Dog park waste routinely removed</li> <li>• Waste removal facilities (bag dispensers and trash receptacles) provided and maintained</li> </ul>
NOI-1	<p><b>Construction Noise Reduction Measures.</b> Construction activity for site preparation and for future development shall be limited to the hours between 7:00 a.m. and 4:00 p.m., Monday through Friday. No construction shall occur on State holidays</p>	CUSD and contractors	CUSD	<ul style="list-style-type: none"> <li>• Throughout construction – noise control measures implemented</li> </ul>	<ul style="list-style-type: none"> <li>• No construction noise between 7pm and 7am Monday through Friday or</li> </ul>

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Number	Mitigation Measure	Implementation Responsibility	Monitoring Responsibility	Mitigation Timing	Performance Evaluation Criteria
	(e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours.				after 4 pm on Saturday • Construction schedule and contact information posted and distributed
WIL-1	<b>Wildfire Hazard Remediation.</b> In the event that the property is affected by a wildfire, the District shall consult with Calfire and/or the Cloverdale Fire Protection District to determine the degree to which the wildfire has affected the project property, including consideration of potential slope instability and potential hazards associated with tree health. If recommended by Calfire and/or the Cloverdale Fire Protection District, the District shall retain a qualified geotechnical engineer to evaluate soil and slope conditions of areas affected by wildfire activity, including wildfire that occurred adjacent to but not within the project property, and to recommend remediation activities for any identified hazardous conditions. Further, the District shall conduct public outreach and post signs around the perimeter of the property notifying the public that use of the fields is prohibited until the assessment and any necessary remediation activities are complete.	CUSD and contractors	CUSD	• Throughout project operation if site is affected by wildfire	• Post-wildfire hazards evaluated and remediated