Police Station Project
PLN2020-00627

DRAFT MITIGATION MONITORING AND REPORTING PROGRAM

PROJECT LOCATION

601 Santa Barbara Street (formerly 119 E. Cota Street)

PROJECT DESCRIPTION

The project consists of demolition of an existing parking lot and construction of a new three-story, approximately 53-foot-high, approximately 64,000-square-foot Police Station building, and associated 37.5-foot-high, approximately 84,000-square-foot parking structure to accommodate 236 parking spaces (128 for Police Department fleet vehicles and 108 for employee vehicles). Each structure would also have a subterranean level. Emergency service antennas would be installed on the roof of the parking structure. Eight additional vehicle surface parking spaces and four bicycle parking spaces would be provided for visitors. Grading includes 22,000 cubic yards of export. A total of 23 Tipuana tipu trees and 12 oak trees would be removed; 9 Tipuana tipu trees would be protected. The existing MTD bus stop shelter on Cota Street would be relocated along Cota Street. The existing plaques commemorating the old Lincoln School would also be relocated and incorporated into the project. The project requires Height Exception and Development Plan approvals by the Planning Commission and Project Design and Final approvals by the Architectural Board of Review. The parcel has a zoning designation of M-C (Manufacturing Commercial) and a General Plan Designation: of Commercial Industrial/ Medium High Density Residential/ Priority Housing Overlay (37-63 du/ac).

PURPOSE

The purpose of the **Police Station** Mitigation Monitoring and Reporting Program (MMRP) is to ensure compliance with all mitigation measures identified in the Initial Study to mitigate or avoid potentially significant adverse environmental impacts resulting from the proposed project. The implementation of this MMRP shall be accomplished by City staff and the project developer's consultants and representatives. The program shall apply to the following phases of the project:

- Plan and specification preparation
- Pre-construction conference
- Construction of the site improvements
- Post Construction

I. RESPONSIBILITIES AND DUTIES

A qualified representative of the developer, approved by the City Planning Division and paid for by the developer, shall be designated as the Project Environmental Coordinator (PEC). The PEC shall be responsible for assuring full compliance with the provisions of this mitigation monitoring and reporting program, as well as all applicable conditions of approval for the project. The PEC shall have authority over all other monitors/specialists, the contractor, and all construction personnel for those actions that relate to the items listed in this program.

It is the responsibility of the contractor to comply with all mitigation measures listed in the attached MMRP matrix. Any problems or concerns between monitors and construction

personnel shall be addressed by the PEC and the contractor. The contractor shall prepare a construction schedule subject to the review and approval of the PEC. The contractor shall inform the PEC of any major revisions to the construction schedule at least 48 hours in advance. The PEC and contractor shall meet on a weekly basis in order to assess compliance and review future construction activities. When deemed necessary by the Community Development Department, the City is authorized to stop work or recover costs to ensure the implementation or long-term performance of required mitigation measures.

A. PRE-CONSTRUCTION BRIEFING

The PEC shall prepare a pre-construction project briefing report. The report shall include a list of all mitigation measures and a plot plan delineating all sensitive areas to be avoided. This report shall be provided to all construction personnel.

The pre-construction briefing shall be conducted by the PEC. The briefing shall be attended by the PEC, construction manager, necessary consultants, Planning Division Case Planner, Public Works representative and all contractors and subcontractors associated with the project. Multiple pre-construction briefings shall be conducted as the work progresses and a change in contractor occurs.

The MMRP shall be presented to those in attendance. The briefing presentation shall include project background, the purpose of the MMRP, duties and responsibilities of each participant, communication procedures, monitoring criteria, compliance criteria, filling out of reports, and duties and responsibilities of the PEC and project consultants.

It shall be emphasized at this briefing that the PEC and project consultants have the authority to stop construction and redirect construction equipment in order to comply with all mitigation measures.

Once construction commences, field meetings between the PEC and project consultants, and contractors shall be held on an as-needed basis in order to create feasible mitigation measures for unanticipated impacts, assess potential effects, and resolve conflicts.

II. IMPLEMENTATION PROCEDURES

There are three types of activities which require monitoring. The first type pertains to the review of the Conditions of Approval and Construction Plans and Specifications. The second type relates to construction activities and the third to ongoing monitoring activities during operation of the project.

A. MONITORING PROCEDURES

The PEC and required consultant(s) shall monitor all field activities. The authority and responsibilities of the PEC and consultant(s) are described in the previous section.

B. REPORTING PROCEDURES

The following three (3) types of reports shall be prepared:

1. Schedule

   The PEC and contractor shall prepare a monthly construction schedule to be submitted to the City prior to or at the pre-construction briefing.

2. General Progress Reports

   The PEC shall be responsible for preparing written progress reports submitted to the City. These reports would be expected on a weekly basis during grading, excavation and construction, activities. The reports would document field activities and compliance with project mitigation measures, such as dust control and sound reduction construction.

3. Final Report

   A final report shall be submitted to the Planning Division when all monitoring (other than long term operational) has been completed and shall include the following:

   a. A brief summary of all monitoring activities.

   b. The date(s) the monitoring occurred.

   c. An identification of any violations and the manner in which they were dealt with.

   d. Any technical reports required, such as noise measurements.

   e. A list of all project mitigation monitors.

C. MMRP MATRIX

The following MMRP Matrix describes each initial study mitigation measure, monitoring activities and the responsibilities of the various parties, along with the timing and frequency of monitoring and reporting activities. For complete language of each condition, the matrix should be used in conjunction with the mitigation measures described in full in the Initial Study.

The MMRP Matrix is intended to be used by all parties involved in monitoring the project mitigation measures, as well as project contractors and others working in the field. The Matrix should be used as a compliance checklist to aid in compliance verification and monitoring requirements. A copy of the MMRP matrix shall be kept in the project file as verification that compliance with all mitigation measures has occurred.

MITIGATION MEASURE	PARTY RESPONSIBLE FOR IMPLEMENTATION	VERIFICATION		
		DATE	ACCOMPLISHED	COMMENTS
AQ-1: Construction Equipment. During construction, heavy-duty diesel-powered construction equipment shall be equipped with Tier 4 Final or better diesel engines and compliance shall be verified by City staff.	Contractor			
BIO-1: Pre-construction Nesting Bird Survey. No vegetation or tree removal shall occur between February 1 and August 30, unless a pre-construction nesting bird survey is completed. A pre-construction survey for nesting birds shall be conducted by a qualified biologist to determine if active nests of special-status birds, or common bird species protected by the Migratory Bird Treaty Act and/or the California Fish and Game Code, are present in the construction zone or within 300 feet of the construction zone. Within one week prior to construction or site preparation activities, the biologist shall conduct the nesting bird survey. A pre-construction nesting bird report shall be completed and submitted to the Project Environmental Coordinator (PEC) within 48 hours of the survey.	Biologist			
BIO-2: Nesting Bird Buffers and Requirements. If active nests are found, a no-construction buffer shall be established at a minimum of 100 feet (this distance may be greater depending on the bird species and construction activity, as determined by the biologist) around the nest site where it overlaps with work areas. Tree and vegetation clearing and construction within the no-construction buffer shall be postponed or halted, at the discretion of the biologist, until the nest is vacated, juveniles have fledged, and there is no evidence of a second attempt at nesting. In addition, all active nests shall be mapped with a GPS unit and nest locations with 100-foot buffers overlain on aerial photographs to provide	Biologist			

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regular updated maps to inform the construction manager and crew of areas to avoid. The biologist shall also serve as a construction monitor during the breeding season to ensure that there are no inadvertent impacts to nesting birds. Bird nest surveys shall be conducted every 14 days following identification of a bird nest until all birds have fled the nest and the nest is deemed inactive by the qualified biologist. A bird nest monitoring report shall be completed and submitted to the Project Environmental Coordinator (PEC) within 48 hours of each survey.				
BIO-3: Tree Replacement for Removed Trees. All trees to be removed, consisting of 9 coast live oaks, 23 tipu trees, and 3 southern oaks, shall be replaced with coast live oaks (or other native species) at a minimum replacement ratio of 1:1 plus 25%, and shall be planted offsite in a native habitat restoration area in Elings Park, or along the Las Positas Multiuse Path, at the discretion of the Parks and Recreation Department. All tree plantings shall be subject to a 5-year monitoring effort by an International Society of Arboriculture (ISA) Certified Arborist. This monitoring effort would consider growth, health, and condition of the subject trees to evaluate the replacement success. The monitoring effort may result in a recommendation of remedial actions should any of the tree plantings exhibit poor or declining health below the recommended replacement quantities. Prior to the issuance of the demolition permit, the planting and monitoring plan shall be submitted to the Community Development Department for review and approval. The plan shall identify the installation site for the replacement trees and include specific measures for protection, management, and monitoring of the trees. The plan shall include annual	Arborist			

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reporting on the condition of the trees for a period of five years.				
BIO-4: Tree Protection. The nine tipu trees indicated on the site plan to be preserved shall be protected during construction according to the tree protection measures in Appendix G of the Biological Assessment (Dudek, March 2022). Before the start of construction activities, all tree protection measures shall be in place. An ISA Certified Arborist shall inspect the tree protection measures regularly to ensure they are maintained through the construction of the project and provide a report to the Project Environmental Coordinator (PEC) for each inspection. In the event that a tipu tree is impacted such that it cannot survive during construction and/ or the 5-year monitoring period, a new tree with similar characteristics, as determined by the Architectural Board of Review, shall be planted in its place.	Arborist			
CR-1: Workers Environmental Awareness Program (WEAP) Training. All construction personnel and monitors who are not trained archaeologists shall be briefed regarding unanticipated discoveries prior to the start of construction activities. A basic presentation shall be prepared to inform all personnel working on the project about the archaeological sensitivity of the area. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during construction of the project and explain the importance of and legal basis for the protection of significant archaeological resources. Each worker shall also learn the proper procedures to follow if cultural resources or human remains are uncovered during ground-disturbing activities. These procedures include	Archaeologist			

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work curtailment or redirection, and the immediate contact of the site supervisor and archaeological monitor.				
CR-2: Archaeological Construction Monitoring. In consideration of the known sensitivity of the project site for cultural resources, archaeological monitoring shall be conducted during all ground disturbance activities. The applicant shall contract with an archaeologist from the most current City Qualified Archaeologists List for monitoring during all ground disturbing activities associated with the project, including, but not limited to, grading, excavation, trenching, vegetation or paving removal and ground clearance. The contract shall be subject to the review and approval of the Environmental Analyst. The archaeologist's monitoring contract shall include the following provisions: If archaeological resources are encountered or suspected, work shall be halted or redirected immediately and the City Environmental Analyst shall be notified. The archaeologist shall assess the nature, extent and significance of any discoveries and develop appropriate management recommendations for archaeological resource treatment which may include, but are not limited to, redirection of grading and/or excavation activities, consultation and/or monitoring with a Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List, etc. If a discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission. A Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all	Archaeologist			

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further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization. If a discovery consists of possible prehistoric or Native American materials or artifacts, a Barbareño Chumash representative from the most current City Qualified Barbareño Chumash Site Monitors List shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization. Prior to issuance of the Certificate of Occupancy (Final Inspection), the applicant shall complete a final report on the results of the archaeological monitoring shall be submitted to the Environmental Analyst within 180 days of completion of the monitoring and prior to the issuance of the Certificate of Occupancy (Final Inspection), whichever is earlier.				
CR-3: Limited Data Recovery Plan and Phase 3 Archaeological Resources Report. The Limited Data Recovery Plan (Dudek, February 10, 2022) accepted by Historic Landmarks Commission on March 16, 2022 shall be implemented, which makes provision for adequately recovering the scientifically consequential information from and about the historical resource (CEQA Guidelines Section 15126.4(b)(3)), and which includes specific levels of effort and methods to obtain a statistically representative sample of significant archaeological deposits as well as field and laboratory requirements to ensure proper treatment of all materials, including documentation of results and curation of the archaeological collection. A qualified archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards, shall be retained to undertake a data recovery program addressing the cultural resource discovered as a result of this study. The data recovery shall recover sufficient material to answer the research questions determined	Archaeologist			

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in the data recovery research design, that the site is potentially capable of addressing. Following data recovery, a Phase 3 Archaeological Resources Report shall be submitted to the City for review and approval by the Historic Landmarks Commission prior to issuance of building permits for the project. The data recovery efforts shall be thoroughly documented in a comprehensive report including the following core elements: theoretical orientation, cultural context, definition of the formulated hypotheses presented in the original research design, all field, laboratory and curation methods, results of research, implications of the results in light of current understanding and its potential to contribute to future research and understanding.				
GEO-1: Final Geotechnical Report and Essential Services Buildings. The final geotechnical report, to be completed based on the final project design, shall be consistent with provisions of the Essential Services Buildings Seismic Safety Act, pursuant to California Administrative Code 2019 (Chapter 4 - Administrative Regulations for the Division of the State Architect – Structural Safety, Article 1 – Essential Services Buildings, and Article 3 - Local Buildings).	Geotechnical Engineer			
GEO-2: Anchored Tie-Backs. The final geotechnical report, to be completed based on the final project design, shall consider the limited building setbacks to adjacent properties and the public right-of-way when designing the temporary shoring system.	Geotechnical Engineer			
GEO-3: Excavation Dewatering. A dewatering permit shall be obtained from the Central Coast Regional Water Quality Control Board prior to construction.	Project Manager/Contractor			

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GEO-4: Former School Basement Fill. The location of the basement of the former Lincoln School shall be found, if possible, based on (cultural-related) soil borings and ground penetrating radar, in order that the area of deeper fill can be identified prior to grading. This basement fill would likely be removed during excavations for the subterranean levels, but in the event the former basement is located outside the footprint of the proposed structures (i.e., in the public parking area/access plaza), the fill shall be removed in this area and replaced with engineered/compacted fill.	Contractor			
GEO-5: Paleontological Resources Impact Mitigation Program. Prior to commencement of any grading activity on-site, the applicant shall retain a qualified paleontologist, subject to the review and approval of the City's Environmental Analyst. The paleontologist shall prepare a Paleontological Resources Impact Mitigation Program (PRIMP) for the project. The PRIMP shall be consistent with the Society of Vertebrate Paleontology (2010) guidelines and outline requirements for preconstruction meeting attendance and worker environmental awareness training, adequate monitoring within the proposed project site based on construction plans and/or geotechnical reports, procedures for adequate paleontological monitoring, discoveries treatment, paleontological methods (including sediment sampling for microvertebrate fossils), reporting, and collections management. The PRIMP shall include protocols for spot-checking significant ground-disturbing activities below a depth of five feet below the ground surface or five feet below the depth of artificial fill in areas mapped as Holocene alluvium and full-time paleontological monitoring below the depth of artificial fill in areas underlain by Pleistocene alluvium. In the event that	Paleontologist			

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paleontological resources (e.g., fossils) are unearthed during grading, the paleontological monitor shall temporarily halt and/or divert grading activity to allow recovery of paleontological resources. The area of discovery shall be roped off with a 50-foot radius buffer. Once documentation and collection of the find is completed, the monitor shall remove the rope and allow grading to recommence in the area of the find.				
HAZ-1: Contaminated Soil Removal. Prior to the issuance of building permits, the project shall be enrolled in the Santa Barbara County, Public Health Department, Environmental Health Services (EHS) Site Management Unit to provide regulatory oversight of the handling and proper disposal of the soil with elevated levels of arsenic located in area B-5.	Project Manager			
HAZ-2: Soil Management Plan. A Soil Management Plan (SMP) shall be developed to provide guidance if any stained or impacted soils are encountered. The SMP shall be reviewed and approved by EHS prior to issuance of the building permits.	Project Manager			
N-1: Temporary Noise Barriers. As recommended in the Noise and Vibration Technical Memorandum (Dudek, July 20, 2020), the construction contractor shall install onsite noise reduction means as follows: a. To protect the existing occupied residences of Anacapa Villas (i.e., receptor R2 from Table 5) from excessive construction-related noise, temporary noise barriers of sufficient height and extent shall be installed along the northwest boundary so that as much as 10 dB of barrier noise insertion loss can be realized. The temporary barrier elements should resemble an outdoor-use vinyl-covered acoustical blanket comprising	Contractor			

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one or more materials that demonstrate a sound transmission class (STC) of 25 or better (see Figure 3 for conceptual views of a sample segment with supporting structure mounted on "k-rail" concrete mass), which, under the right conditions can eliminate the need for drilling posts in the ground. This STC value is at least 10 dB greater than the highest predicted noise reduction effect due to barrier intervention, and is thus consistent with Caltrans Technical Noise Supplement ("TeNS") guidance that states: "any material may be used for a barrier between a noise source and a noise receiver as long as it has a TL of at least 10 dBA more than the desired noise reduction" (Caltrans 2013a). b. To protect the existing occupied residences and/or academic functions at the Antioch University building (i.e., receptor R3 from Table 5) from excessive construction-related noise, temporary noise barriers of sufficient height and extent shall be installed along the northwest site boundary so that as much as 5 dB of barrier noise insertion loss can be realized. The temporary barrier elements should resemble an outdoor-use vinyl-covered acoustical blanket comprising one or more materials that demonstrate a sound transmission class (STC) of 15 or better.				
N-2: Vibration Mitigation Program. As recommended in the Noise and Vibration Technical Memorandum (Dudek, July 20, 2020), the construction contractor shall retain the services of a qualified acoustician to prepare a construction vibration mitigation program, which would include the planning and implementation of one or more of the following activities and/or features: Prohibit operation of project heavy construction equipment (i.e., large bulldozer or comparably vibration-producing equipment per Table 11)	Contractor			

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within a 5-foot horizontal distance buffer of receiving occupied structures associated with Anacapa Villas. Within the 5-foot distance buffer, use alternative means or equipment to perform the same needed construction task or process, as practical. Conduct on-site vibration velocity sampling to evaluate vibration velocity levels of anticipated construction equipment or alternatives intended to generate less vibration magnitude. The Project Environmental Coordinator (PEC) shall inform nearby residence owner/occupants and business owners, in advance, when vibration-intense construction activities on-site are expected to occur. If construction conditions do not cause heavy equipment activity to occur within this 5-foot distance to the Anacapa Villas building façade(s), then implementation of the above measures would not be needed.				
N-3: Construction Management Plan. A Construction Management Plan shall be prepared to address noise and traffic during all phases of construction. The Construction Management Plan shall be developed with input from Antioch University representatives, and surrounding sensitive uses, to coordinate construction activities prior to the start of construction, with the intent to reduce construction impacts to the school and others. The plan shall include measures to reduce construction noise effects on sensitive receptors, ensure safety measures are in place, and minimize disruption to the surrounding roadway network. The Construction Management Plan shall be reviewed and approved by the City Environmental Analyst prior to issuance of building permits.	Project Manager			

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N-4: Emergency Generator Barrier. As recommended in the Noise and Vibration Technical Memorandum (Dudek, July 20, 2020), the stand-by generator shall be surrounded with a three-sided "U"-shaped barrier of connected wall sections that provide occlusion of direct sound pathways between the operating generator and receiver positions to the northeast, northwest, and southwest. The barrier shall be constructed of solid materials, with no air-gaps or cracks, and demonstrate a minimum sound transmission class (STC) rating of 25. Additional features of the barrier include:
• The barrier extent and position with respect to the generator will not impede equipment access and maintenance.
• The barrier may be portable or removable, so that its application need only be temporary and installed prior to and during a generator testing opportunity, then dis-assembled and stored on-site until the next scheduled testing opportunity.
• Top-edge height of the barrier with respect to grade will vary with the stand-by generator type as follows:
  • Skid-mounted C18 ACERT U.S. EPA Tier 4 Sound Attenuated Enclosure – 10 feet
  • Mounted on sub-base fuel tank – 13.5 feet
	Contractor			

N-5: Firearm Sound Attenuation. As recommended in the Noise and Vibration Technical Memorandum (Dudek, July 20, 2020), the project	Contractor			

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shall incorporate passive, dissipative sound attenuation in the form of interior ductwork lining, manufactured "sound traps," or other means, based on testing or published engineering data, between the firing range interior closed volume in which the discharges occur and the exit of the exhaust duct outlet at the parking structure roof, such that the average hourly noise level is no greater than 50 dBA, 45 dBA, and 40 dBA for daytime (7 am-7 pm), evening (7 pm-10 pm), and nighttime (10 pm-7am) hours, respectively, when measured at a distance of 50 feet. Prior to Certificate of Occupancy, acoustical sound measurements shall be taken and documentation of recorded sound measurements shall be provided to the City's Environmental Analyst. If noise levels are found to exceed the average hourly noise levels listed above, additional noise reduction measures shall be implemented and additional sound measurements shall be taken.				
PS-1: Solid Waste Management Plan for Construction. Prior to issuance of a demolition or building permit for the project, the applicant shall develop a Solid Waste Management Plan for Construction, subject to approval by the City's Environmental Analyst, to ensure that the diversion rate achieved is 85% in order to generate less than 350 tons of construction and demolition debris. All requirements of the plan shall be implemented on-site.	Project Manager/Contractor			
PS-2: Solid Waste Management Plan for Long-term Operations. Prior to issuance of a building permit for the project, the applicant shall develop a Solid Waste Management Plan, subject to approval by the City's Environmental Analyst and Environmental Services Division, to ensure that the amount of long-term (operational) solid waste going to the landfill	Project Manager/ Operator			

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to less than 40 tons per year (TPY). All requirements of the plan shall be implemented on-site.				
WQ-1: Groundwater Dewatering Monitoring. The applicant shall conduct groundwater sampling and analysis of priority pollutants listed in 40 CFR 401.15 (including PCE, TCE, 1,1-DCE, cis-1,2-dichloroethene, vinyl chloride, chloroform, and petroleum hydrocarbons), and shall provide the results to the Central Coast Regional Water Quality Control Board (RWQCB). Depending on the pollutant levels detected and the specifics of the dewatering discharge, the RWQCB may authorize the discharge under an existing general permit, or may require issuance of an individual National Pollutant Discharge Elimination System (NPDES) Permit and/or waste discharge requirements (WDR). In either case, if the analytical results of the groundwater samples indicate that the discharge would exceed applicable discharge prohibitions, effluent criteria, and receiving water limitations, the applicant shall be required to: 1) Design and implement a treatment program prior to discharge of groundwater to the storm drain, which would depend on the pollutant levels detected, but could include one or more of the following: • Desilting basins for removing excess sediment, to granular activated carbon (GAC) canisters for removal of PCE. • Pump to baker tanks and haul away for off-site treatment/disposal (construction).	Contractor			

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• Pump and treat to City storm drain with approval of and in coordination with Public Works. • Pump to sanitary sewer and treat if require with approval of and in coordination with sanitation district. 2) Prepare and implement a Monitoring and Reporting Program (MRP), consistent with RWQCB requirements, that demonstrates compliance with effluent limitations for reportable pollutants using the sampling and analytical methods defined in the MRP. Written verification from the RWQCB that it has authorized both the construction and long-term groundwater dewatering discharge, if required, and that it approves of the proposed treatment program and MRP shall be submitted to the Project Environmental Coordinator (PEC). This applies for both short-term construction dewatering purposes, and for use of a permanent subgrade dewatering system, if required.				
WQ-2: Adequate Stormwater Storage Capacity. Prior to the issuance of the building permit, the applicant shall demonstrate that the proposed stormwater storage chambers will function in compliance with the stormwater retention and infiltration requirements established in the City's Storm Water Management Program (SWMP) and National Pollutant Discharge Elimination System (NPDES) permit, even under high groundwater conditions. This may be achieved through one or more of the following means: Ensure sufficient storage and infiltration rates can be achieved above the maximum potential groundwater elevation. As the maximum groundwater elevation for the project site remains unknown, a comprehensive geotechnical or hydrogeological investigation will be required to assess	Project Manager/Contractor			

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final storage and infiltration rates for any proposed subsurface stormwater chambers. Ensure project dewatering will maintain depressed groundwater levels such that the subsurface storage chambers will maintain capacity and infiltration rates. Implement above ground storage chambers (e.g., rainwater cisterns) to make up for the lost stormwater retention requirement during high groundwater. This water could be used for on-site irrigation and/or connected to vegetated filter strips/swales.				