

# ATTACHMENT B

MITIGATION MONITORING PLAN  
 WILFRED AVENUE WIDENING PROJECT  
 NORTH COAST REGIONAL WATER QUALITY CONTROL BOARD

This Mitigation Monitoring Plan describes the mitigation and monitoring plan responsibilities applicable to the North Coast Regional Water Quality Control Board's approval of the Wilfred Project Section 401 Water Quality Certification.

MITIGATION MEASURE	SOURCE	IMPLEMENTING RESPONSIBILITY	TIMING	VERIFICATION (DATE & INITIALS)
<b>WATER RESOURCES</b>				
<p>A. During construction, surface water quality shall be protected by using Best Management Practices ("BMPs") as listed in the Erosion Control recommendations found in FEIS Appendix C. These BMPs would be included in the SWPPP to be filed with either the U.S. Environmental Protection Agency (USEPA) or the Regional Water Quality Control Board (RWQCB), as appropriate. BMPs to be implemented for protection of surface water quality include the following:</p> <ul style="list-style-type: none"> <li>a. Appropriate RWQCB procedures;</li> <li>b. Development of a Spill Prevention and Control Plan;</li> <li>c. Solid Waste Management Plan; and</li> <li>d. Erosion and sediment control practices.</li> </ul>	<p>Findings Document; EIS</p>	<p>Contractor through contractual obligation with the City; USEPA; RWQCB</p>	<p>Construction</p>	
<b>BIOLOGICAL RESOURCES</b>				

MITIGATION MONITORING PLAN  
WILFRED AVENUE WIDENING PROJECT

MITIGATION MEASURE	SOURCE	IMPLEMENTING RESPONSIBILITY	TIMING	VERIFICATION (DATE & INITIALS)
<p>A. The FEIS states that a plan shall be developed and implemented to conserve ecological resources in the southern portion of the Graton Rancheria Casino Project site. The plan shall address management activities to ensure maintenance of breeding, refugia, and dispersal habitats for CTS; should provide prescriptions for management of sensitive resources including existing wetlands and populations of Sonoma sunshine; and should provide a grazing regimen that will conserve populations of Sonoma sunshine and Burke's goldfields. The current mitigation ratios for listed plants species on the Santa Rosa Plain, as required in the Programmatic BO, are based on the presence of suitable versus occupied habitat and the potential for presence of Burke's goldfields and Sonoma sunshine or Sebastopol meadowfoam (USFWS, 2007). The USFWS applied these mitigation ratios in the assessment of both direct and indirect habitat impacts. The 2009 BO issued by the USFWS for the Preferred Alternative on the Wilfred Site (FEIS, Appendix JJ) requires mitigation ratios for listed plant species consistent with the Programmatic BO as displayed in FEIS, Table 5-3. Specifically, a mitigation ratio of 2:1 was applied for impacts within 500 feet of a documented CTS breeding site; a 1:1 ratio for impacts within 1.3 miles of a known breeding site but less than 2,200 feet from a known breeding site, and a 1.5:1 ratio for impacts between these two distances. All mitigation for impacts to listed plant species under the Wilfred Avenue Project would be consistent with USFWS requirements pursuant to consultation within the 2009 BO</p>	<p>Findings Document; EIS</p>	<p>City</p>	<p>Preconstruction</p>	
<p>B. Impacts to CTS aestivation habitat shall be mitigated off-site and shall consist of purchase of CTS credits from an approved mitigation bank or purchase of farmland providing suitable habitat for CTS (where CTS are known to occur) and placement of the land under conservation easement. Biological monitors would be present during construction of the Graton Rancheria Casino Project and during excavation associated with any wetland creation to remove any CTS found in the work area and relocate them to suitable habitat approved by the USFWS. It is</p>	<p>Findings Document; EIS</p>	<p>City</p>	<p>Preconstruction</p>	

MITIGATION MONITORING PLAN  
WILFRED AVENUE WIDENING PROJECT

MITIGATION MEASURE	SOURCE	IMPLEMENTING RESPONSIBILITY	TIMING	VERIFICATION (DATE & INITIALS)
<p>anticipated and proposed in the permit applications that similar requirements would apply to the mitigation under this CWA Section 404 permit and are therefore assumed to be analyzed and required under this mitigation measure.</p> <p>All mitigation for impacts to CTS shall be consistent with USFWS requirements pursuant to formal consultation. All CTS mitigation would be accomplished off-site and would consist of purchase of CTS credits from an approved mitigation bank or purchase of farmland providing suitable habitat for CTS (actually where CTS are known to occur) and placing the area under a conservation easement. Mitigation for impacts to CTS shall also include the conservation and protection measures identified in the 2009 BO (FEIS, Appendix JJ).</p>				
<p>C. A pre-construction survey for burrowing owls shall be conducted to ensure impacts to burrowing owls, if present in the construction area, do not occur during the nesting season. The pre-construction survey shall be conducted within 30 days prior to initiation of construction activity. If active burrows are found prior to the nesting season, passive relocation measures shall be provided for each burrow in the area of the Wilfred or Stony Point sites, as appropriate, that is rendered biologically unsuitable. Passive relocation measures shall include the creation of two natural or artificial burrows for each burrow rendered biologically unsuitable. Daily monitoring shall be implemented until the owls have been relocated to the new burrows. This measure will reduce potential impacts to burrowing owls. Other mitigation measures may be implemented in lieu of the proposed mitigation, including avoidance or passive relocation with one-way doors, as outlined in the "Staff Report on Burrowing Owl Mitigation" (CDFG, 1995).</p>	<p>Findings Document; EIS</p>	<p>City</p>	<p>Preconstruction</p>	
<p>D. Pre-construction surveys for nesting birds shall be conducted within 30 days prior to initiation of construction activity. If feasible, construction and tree removal (grubbing, vegetation removal) should be timed to</p>	<p>Findings Document; EIS</p>	<p>City</p>	<p>Preconstruction</p>	

MITIGATION MONITORING PLAN  
WILFRED AVENUE WIDENING PROJECT

MITIGATION MEASURE	SOURCE	IMPLEMENTING RESPONSIBILITY	TIMING	VERIFICATION (DATE & INITIALS)
<p>take place during late summer months and through winter, ideally from September through February, to avoid impacting nesting birds and other sensitive wildlife species. The approximate nesting season extends from February to September, with a peak nesting period from March through June. If construction or grubbing activities are to take place between late February and late June, a pre-construction survey shall be performed by a qualified biologist to identify any active nests or other special-status species, at least two weeks prior to the start of construction. If bird nests are found, appropriate buffer zones shall be established around all active nests to protect nesting adults and their young from construction disturbance. Through direct consultation with wildlife agency staff, the size of buffer zones shall be determined based on site conditions and species involved. If impacts to nests are unavoidable, consultation shall continue with specific agency guidelines followed for relocation. If construction is delayed for more than two weeks, a second survey shall be performed.</p>				
<p>E. All grading and clearing shall be conducted after April 15 and before October 15 of any year, depending on rainfall and/or site conditions to minimize erosion. Access roads and routes will be limited, as well as the construction staging area, to the minimum size required to achieve the goals of the project. A speed limit of 15 mph on dirt roads shall be maintained. These practices will limit erosion and dust borne particles.</p>	<p>Findings Document; EIS</p>	<p>City</p>	<p>Preconstruction</p>	
<p>F. During construction, vegetation shall only be cleared from the permitted construction footprint and necessary lay-down and assembly areas. Areas cleared of vegetation, pavement, or other substrates shall be stabilized as quickly as possible and BMPs applied (erosion fencing, straw and other material applied to soils) to prevent erosion and runoff that could affect steelhead fish in the Laguna de Santa Rosa.</p>	<p>Findings Document; EIS</p>	<p>City</p>	<p>Preconstruction</p>	
<p>G. Hazardous materials including fuels, oils, solvents, etc., shall be stored in sealed containers in a designated location at a minimum of 200 feet</p>	<p>Findings Document;</p>	<p>City</p>	<p>Preconstruction</p>	

MITIGATION MONITORING PLAN  
WILFRED AVENUE WIDENING PROJECT

MITIGATION MEASURE	SOURCE	IMPLEMENTING RESPONSIBILITY	TIMING	VERIFICATION (DATE & INITIALS)
from aquatic environments. All fueling and maintenance of equipment shall be conducted at a minimum of 200 feet from aquatic environments.	EIS			
H. All food items and food-related trash shall be sealed in containers prior to leaving the construction site at the end of the workday; these items shall be removed from the site once every three days. This measure will limit attraction of wildlife and eliminate trash pollution in the Laguna de Santa Rosa.	Findings Document; EIS	City	Preconstruction	
I. Where appropriate, vegetation removed as a result of project activities shall be replaced with native species that are of value to local wildlife. Native plants have a significant cultural value, are generally more valuable as wildlife food sources, and require less irrigation, fertilizers, and pesticides than exotic species.	Findings Document; EIS	City	Preconstruction	

130523\_Wilfred\_Ave\_MMRP