6 MITIGATION MONITORING AND REPORTING PROGRAM

This document is a Mitigation Monitoring and Reporting Program (MMRP) for the proposed Valhalla Residential Condominiums Project. The purpose of the MMRP is to ensure the implementation of mitigation measures identified as part of the environmental review for the Project. The MMRP includes the following information:

- A list of impacts and their corresponding mitigation measures.
- The party responsible for implementing mitigation measures.
- The timing for implementation of the mitigation measure.
- The agency responsible for monitoring the implementation of mitigation measures.
- The procedure and frequency for monitoring the implementation of mitigation measures.

The MMRP also serves as a form for the monitoring agency to document the date that mitigation implementation is verified.

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Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/ Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
Air Quality						
AQ-1: The Project's construction contractor shall comply with the following BAAQMD Best Management Practices for reducing construction emissions of PM_{10} and $PM_{2.5}$: ♦ Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. ♦ Pave, apply water twice daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. ♦ Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least two feet of freeboard (i.e. the minimum required space between the top of the load and the top of the trailer). ♦ Sweep daily (with water sweepers using reclaimed water if possible), or as often as needed, all paved access roads, parking areas and staging areas at the construction site to control dust. ♦ Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the Project site, or as often as needed, to keep streets free of visible soil material. ♦ Hydroseed or apply non-toxic soil stabilizers to inactive construction areas. ♦ Enclose, cover, water twice daily, or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.). ♦ Limit vehicle traffic speeds on unpaved roads to 15 mph. ♦ Replant vegetation in disturbed areas as quickly as possible. ♦ Install sandbags or other erosion control measures to prevent silt runoff from public roadways.	Construction Contractor	During construction	Building Division (415) 289-4128	Review construction specifications materials and retain for administrative record/ Conduct site inspections	During regularly scheduled site inspections	Initials:_____ Date:_____
AQ-2: The construction contractor shall use Level 3 Diesel Particulate Filters for construction equipment over 75 horsepower. These types of filters are capable of reducing particulate matter emissions by 85 percent. A list of construction equipment by type and model year shall be maintained by the construction contractor on site. The construction contractor shall ensure that all construction equipment is properly serviced and maintained to the manufacturer's standards to reduce operational emissions, and shall limit nonessential idling of construction equipment to no more than five consecutive minutes.	Construction Contractor	During construction	Building Division (415) 289-4128	Review construction specifications materials and retain for administrative record/ Conduct site inspections	During regularly scheduled site inspections	Initials:_____ Date:_____

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Biological Resources						
BIO-1: Accessible portions of the Valhalla structure should be surveyed within a month prior to construction for evidence of roosting bats. If a maternity roost of bats occurs at the Valhalla, then it should not be disturbed between April 15 and August 31. Juvenile bats can live on their own after August 31. If a hibernating roost of bats is present, then it should not be disturbed between October 15 and March 1 when it is warm enough for bats to cease hibernating. If a colony of bats is present, then they should be excluded by installing excluders that allow bats to exit and not return. This should be done by a contractor that has previous experience excluding bats from structures. It is recommended that the Project sponsor survey several months prior to renovation to allow exclusion of bats (if they have colonized the Valhalla) prior to breeding or hibernating.	Qualified Bat Biologist	Prior to issuance of demolition permit	Planning Division (415) 289-4128	As recommended in biological survey	As recommended in biological survey	Initials:_____ Date:_____
BIO-2: To mitigate the potential impact of the deposition of construction debris, the construction crew should remove any deposited debris on an hourly basis prior to the tides washing the debris away.	Construction Contractor	During construction	Building Division (415) 289-4128	Conduct site inspections	During regularly scheduled site inspections	Initials:_____ Date:_____
BIO-3: The Project sponsors should submit a wetland delineation to the Corps that shows the location of Corps jurisdiction. If the Project is within Corps jurisdiction, the Project sponsors should acquire the appropriate permits from the Corps, RWQCB, and BCDC prior to initiating construction.	Project sponsor	Prior to construction	Planning Division (415) 289-4128	Review wetland delineation and permits and retain for administrative record	Once	Initials:_____ Date:_____
BIO-4: The concrete footings, if installed "in place" should be isolated from seawater until they have cured. The following best management practices shall be followed during the installation of the footings and piers: ♦ Concrete truck chutes, pumps, and internals shall be washed out only into formed areas awaiting installation of concrete. ♦ When no formed areas are available, washwater and leftover product shall be contained in a lined container or returned to the originating batch plant for recycling. ♦ Contained concrete shall be disposed of in a manner that does not violate groundwater or surface water quality standards. ♦ Unused concrete remaining in the truck and pump shall be returned to the originating batch plant for recycling. ♦ Hand tools, including, but not limited to, screeds, shovels, rakes, floats, and trowels, shall be washed off only into formed areas awaiting installation of concrete or asphalt or into containers to be returned to the originating batch plant. ♦ In summary, all cleaning of equipment and tools and all disposal of excess	Construction Contractor	During construction	Building Division (415) 289-4128	Conduct site inspections	During regularly scheduled site inspections	Initials:_____ Date:_____

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concrete and or washwater shall occur in a manner and in an area that shall not result in contamination bay waters. ♦ Forms shall be checked for holes in the liner daily during pouring of concrete and curing.						
Cultural Resources						
CULT-1: The Project applicant shall contact a qualified archaeologist to monitor Project ground-disturbing activities in the event that archaeological resources are discovered during construction. In every event that archaeological resources are identified, the archaeologist shall prepare a Monitoring Plan for the Project. The Monitoring Plan shall describe the specific methods and procedures that will be used in the event that archaeological deposits are identified. Archaeological monitors shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the finds are being evaluated. Monitoring shall continue until, in the archaeologist's judgment, cultural resources are not likely to be encountered. If archaeological materials are encountered during Project activities, all work within 25 feet of the discovery shall be redirected until the archaeologist assesses the finds, consults with agencies as appropriate, and makes recommendations for the treatment of each and every discovery. If avoidance of the archaeological deposit is not feasible, the archaeological deposits shall be evaluated for their eligibility for listing in the California Register of Historical Resources. If the deposits are not eligible, mitigation is not necessary. If the deposits are eligible, adverse effects on the deposits shall be mitigated. Mitigation may include excavation of the archaeological deposit in accordance with a data recovery plan (see *CEQA Guidelines* §15126.4(b)(3)(C)) and standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; preparation of a report detailing the methods, findings, and significance of the archaeological site and associated materials; and accessioning of archaeological materials and a technical data recovery report at a curation facility. Upon completion of the monitoring and any associated studies (i.e., archaeological excavation and laboratory analysis), the archaeologist shall prepare a report to document the methods and results of these efforts. The report shall be submitted to the City of Sausalito and the Northwest Information Center at Sonoma State University upon completion of the	Project Sponsor, Construction Contractor	During construction	Planning Division (415) 289-4128	Review contract documents and retain for administrative record	Once	Initials:_____ Date:_____

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resource assessment.						
CULT-2: Should paleontological resources be encountered during Project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist shall be contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of each and every discovery. If found to be significant, and Project activities cannot avoid the paleontological resources, adverse effects on paleontological resources shall be mitigated. Mitigation may include monitoring, recording of the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the City of Sausalito for review. If paleontological materials are recovered, the report shall also be submitted to a paleontological repository, such as the University of California Museum of Paleontology. The applicant shall inform its contractor(s) of the sensitivity of the project area for paleontological resources. The City shall verify that the following directive has been included in the appropriate construction documents: The subsurface of the construction site may be sensitive for paleontological resources. If paleontological resources are encountered during project subsurface construction and a paleontologist is not on-site, all ground-disturbing activities within 25 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Paleontological resources include fossil plants and animals, and such trace fossil evidence of past life as tracks. Ancient marine sediments may contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa; and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber tooth cat, horse, ground sloth, dire wolf and bison. Paleontological resources also include plant imprints, petrified wood, and animal tracks.	Project Sponsor, Construction Contractor	During construction	Planning Division (415) 289-4128	Review contract documents and retain for administrative record	Once	Initials:_____ Date:_____
CULT-3: Implement Mitigation Measure CULT-1.			*See Mitigation Measure CULT-1*			
Geology and Soils						
GEO-1: Prepare and submit geotechnical reports prior to the Project construction. A geotechnical engineer shall sign the improvement plans and	Project Sponsor, Geotechnical	Prior to construction	Building Division (415) 289-4128,	Review reports and retain for administrative	During regularly scheduled site	Initials:_____

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approve them as conforming to their recommendations prior to construction. The project geotechnical engineer shall provide geotechnical observation during the construction, which will allow the geotechnical engineer to compare the actual with the anticipated soil conditions and to check that the contractors' work conforms to the geotechnical aspects of the plans and specifications. The geotechnical engineer will prepare letters and as-built documents, to be submitted to the City, to document their observances during construction and to document that the work performed is in accordance with the project plans and specifications.	Engineer		Geotechnical Engineer, Engineering Division (415) 289-4113	record; conduct site inspections	inspections	Date:_____
GEO-2: The recommendations for soils, drilled piers, footings, and other geotechnical engineering measures specified in the applicant's geotechnical reports (prepared by Nersi Hemati, dated February 6, 2012) shall be implemented during Project design and construction. These measures include the reconstruction of loose soils as engineered fill and use of non-expansive imported fill. Documentation of the methods used shall be provided in the required design-level geotechnical report(s).	Construction contractor	Prior to construction	Building Division (415) 289-4128	Review design plans and retain for administrative record	Once	Initials:_____ Date:_____
Hazards and Hazardous Materials						
HAZ-1a: Hire the services of a California Division of Occupational Safety and Health (Cal/OSHA) certified qualified asbestos abatement consultant to conduct a pre-construction assessment for ACM. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the City of Sausalito Planning Division from a qualified asbestos abatement consultant that no ACM are present in the buildings. If ACM are found to be present, the hazardous materials shall be properly removed and disposed prior to demolition of buildings on the Project site in compliance with applicable federal, State, and local regulations, such as the US Environmental Protection Agency's (EPA) National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation, Bay Area Air Quality Management District (BAAQMD) Regulation 11, Title 8 of the California Codes of Regulations, and the California EPA's Unified Hazardous Waste and Hazardous Materials Management Regulation Program (Unified Program).	Project Sponsor, Cal/OSHA Consultant	Prior to construction	Building Division (415) 289-4128	Review letter issued by consultant and retain for administrative record	Once	Initials:_____ Date:_____
HAZ-1b: Hire the services of a qualified lead paint abatement consultant to conduct a pre-construction assessment of LBP. Prior to the issuance of the demolition permit, the applicant shall provide a letter to the City of Sausalito Planning Division from a qualified lead paint abatement consultant that no lead paint is present in on-site buildings. If lead paint is found to be present on buildings to be demolished or renovated, the hazardous materials shall be properly removed and disposed in compliance with applicable federal, State, and local regulations, including the US EPA's NESHAP regulations, Title 40 of	Project Sponsor, Abatement Consultant	Prior to construction	Building Division (415) 289-4128	Review letter issued by consultant and retain for administrative record	Once	Initials:_____ Date:_____

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the Code of Federal Regulations, Title 8 of the California Codes of Regulations, and the Unified Program.						
Hydrology and Water Quality						
HYDRO-1a: Prior to the issuance of building permits, an Elevation Certificate shall be submitted to the Department of Public Works which identifies the lowest finished floor elevation of all structures with respect to the 100-year base flood elevation. All provisions for building within the floodplain that are specified in Municipal Code 8.48 shall be implemented to minimize the risk of flood damage at the site.	Project Sponsor	Prior to issuance of building permits	Department of Public Works (415) 289-4113	Review certificate and retain for administrative record	Once	Initials:_____ Date:_____
HYDRO-1b: As part of the variance request to allow the Main Street Boardwalk to be rebuilt, and the accessible ramp to be built below the FEMA Base Flood Elevation (BFE) of 13 feet NAVD 88 expected to be effective in 2015, a wave analysis report and a structural analysis of the hydraulic forces on these structures shall be submitted to the Floodplain Administrator to show that the structural integrity will be maintained during the 100-year flood with wave action. As part of the variance request to allow the Bridgeway Boardwalk to remain at its existing elevation, (below the FEMA BFE of 13 feet NAVD 88 expected to be effective in 2015) a wave analysis report calculating the hydraulic forces on this structure, combined with a structural report stating that a detailed structural evaluation can be performed that identifies what, if any, structural upgrades are necessary to resist such forces, shall be submitted to the Floodplain Administrator to show that the structural integrity will be maintained during the 100-year flood with wave action once any necessary upgrades are implemented.	Project Sponsor	Prior to issuance of building permits	Department of Public Works (415) 289-4113	Review certificate and retain for administrative record	Once	Initials:_____ Date:_____
Noise						
NOISE-1: During Project construction, the use of vibratory rollers shall not be used. If soil compaction is required during Project construction, other methods such as static rollers shall be used instead.	Construction Contractor	During construction	Building Division (415) 289-4128	Review construction specifications materials and retain for administrative record/ Conduct site inspections	During regularly scheduled site inspections	Initials:_____ Date:_____

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