
MITIGATION MONITORING AND REPORTING PROGRAM

This Draft Mitigation Monitoring and Reporting Program (MMRP) has been formulated based upon the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the Antioch Natural Supplements Project (project) submitted by Natural Supplements (the project sponsor) for which the City of Antioch (City) is the CEQA Lead Agency for environmental review. The MMRP, which is provided in Table A, lists mitigation measures recommended in the IS/MND for the proposed project and identifies mitigation monitoring requirements. The Final MMRP must be adopted when the City makes a final decision on the project.

This MMRP has been prepared to comply with the requirements of State law (Public Resources Code Section 21081.6). State law requires the adoption of an MMRP when mitigation measures are required to avoid significant impacts. The MMRP is intended to ensure compliance during implementation of the project.

The MMRP is organized in a matrix format:

- The first column identifies the mitigation measure that would be implemented for each project impact.
- The second column refers to the party or agency responsible for implementing the mitigation measure.
- The third column refers to the action that prompts implementation and/or implementation timing.
- The fourth column refers to the agency responsible for oversight or ensuring that the mitigation measure is implemented.
- The fifth column refers to the action that prompts the commencement of monitoring.
- The sixth column refers to when the monitoring will occur to ensure that the mitigation action is completed.
- The seventh and final column is where the lead agency contact initials and dates are provided as verification of mitigation measure implementation.

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Table A: Mitigation Monitoring and Reporting Program

Mitigation Measures	Party Responsible for Implementation	Implementation Trigger/Timing	Agency Responsible for Monitoring	Monitoring Action	Monitoring Frequency	Verified Implementation
4.1 AESTHETICS						
Mitigation Measure AES-1: Outdoor lighting (building façade lighting, security lighting, and parking lot lighting) shall be designed to minimize glare and spillover to surrounding properties. The project design and building materials, shall incorporate non-mirrored glass to minimize daylight glare. The lighting plan of the proposed project shall be reviewed and approved by the City’s Planning Division during Design Review prior to issuance of a building permit.	Project Applicant	Prior to issuance of a building permit	City of Antioch Community Development Department	Lighting designs review and approval	Before the start of construction	Initials: _____ Date: _____
4.3 AIR QUALITY						
Mitigation Measure AIR-1: In order to meet the Bay Area Air Quality Management District (BAAQMD) fugitive dust threshold, the following BAAQMD Basic Construction Mitigation Measures shall be implemented: <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • All visible mud or dirt tracked-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. • All vehicle speeds on unpaved roads shall be limited to 15 mph. • All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. • Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. • Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the 	Construction Manager	During grading and construction activities	City of Antioch Public Works Department	Construction schedule, equipment, and site to be reviewed and inspected for compliance with BAAQMD Basic Construction Mitigation Measures	Before the start of construction and continually during construction	Initials: _____ Date: _____

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<p>California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]. Clear signage shall be provided for construction workers at all access points.</p> <ul style="list-style-type: none"> All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. A publicly visible sign shall be posted with the telephone number and person to contact at the City of Antioch regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD's phone number shall also be visible to ensure compliance with applicable regulations. 						
<p>4.4 BIOLOGICAL RESOURCES</p>						
<p>Mitigation Measure BIO-1: If feasible, all vegetation removal shall be conducted during the non-breeding season (i.e., September 1 to January 31) to avoid direct impacts to nesting birds. If such work is scheduled during the breeding season, a qualified biologist or ornithologist shall conduct a pre-construction survey to determine if any birds are nesting within the project site. The pre-construction survey shall be conducted within 15 days prior to the start of work from March through May (since there is a higher potential for birds to initiate nesting during this period), and within 30 days prior to the start of work from June through July. If active nests are found during the survey, the biologist or ornithologist shall determine an appropriately sized buffer around the nest in which no work shall be allowed until the young have successfully fledged. The size of the buffer shall be determined by the biologist or ornithologist in consultation with the California Department of Fish and Wildlife, and</p>	<p>Project Applicant/ Project Biologist</p>	<p>During the breeding season (February 1 through August 31)</p>	<p>City of Antioch Community Development Department</p>	<p>Pre-construction survey within 15 to 30 days prior to the start of work, ensure establishment and maintenance of buffer</p>	<p>Before the start of construction and continually during construction</p>	<p>Initials: _____ Date: _____</p>

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would be based on the nesting species, its sensitivity to disturbance, and the expected types of disturbance.						
4.5 CULTURAL RESOURCES						
<p>Mitigation Measure CULT-1: Should an archaeological deposit be encountered during project subsurface construction activities, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for Archeology contacted to assess the situation, determine if the deposit qualifies as a historical resource, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. If the deposit is found to be significant (i.e., eligible for listing in the California Register of Historical Resources), the applicant shall be responsible for funding and implementing appropriate mitigation measures. Mitigation measures may include recordation of the archaeological deposit, data recovery and analysis, and public outreach regarding the scientific and cultural importance of the discovery. Upon completion of the selected mitigations, a report documenting methods and findings shall be prepared and submitted to the City for review, and the final report shall be submitted to the Northwest Information Center at Sonoma State University. Significant archaeological materials shall be submitted to an appropriate curation facility and used for public interpretive displays, as appropriate and in coordination with a local Native American tribal representative.</p> <p>The applicant shall inform its contractor(s) of the sensitivity of the project area for archaeological deposits and shall verify that the following directive has been included in the appropriate contract documents:</p> <p><i>“The subsurface of the construction site may be sensitive for</i></p>	Project Applicant/ Construction Manager/ Qualified Archaeologist	During all ground-disturbing activities and after resources are identified	City of Antioch Community Development Department	Initiated in the event that a find is made during construction	During regularly scheduled site inspections that would be initiated in the event that a find is made during construction	Initials: _____ Date: _____

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<p><i>Native American archaeological deposits. If archaeological deposits are encountered during project subsurface construction, all ground-disturbing activities within 25 feet shall be redirected and a qualified archaeologist contacted to assess the situation, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any archaeological materials. Archaeological deposits can include shellfish remains; bones; flakes of, and tools made from, obsidian, chert, and basalt; and mortars and pestles. Contractor acknowledges and understands that excavation or removal of archaeological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5.”</i></p>						

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3.7 GEOLOGY AND SOILS						
<p>Mitigation Measure GEO-1: Should paleontological resources be encountered during project subsurface construction activities, 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. For purposes of this mitigation, a “qualified paleontologist” shall be an individual with the following qualifications: (1) a graduate degree in paleontology or geology and/or a person with a demonstrated publication record in peer-reviewed paleontological journals; (2) at least two years of professional experience related to paleontology; (3) proficiency in recognizing fossils in the field and determining their significance; (4) expertise in local geology, stratigraphy, and biostratigraphy; and (5) experience collecting vertebrate fossils in the field. If the paleontological resources are found to be significant and project activities cannot avoid them, measures shall be implemented to ensure that the project does not cause a substantial adverse change in the significance of the paleontological resource. Measures may include monitoring, recording the fossil locality, data recovery and analysis, a final report, and accessioning the fossil material and technical report to a paleontological repository. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the City of Antioch for review. If paleontological materials are recovered, this report also shall be submitted to a paleontological repository such as the University of California Museum of Paleontology, along with significant paleontological materials. Public educational outreach may also be</p>	<p>Project Applicant/ Construction Manager/ Qualified Paleontologist</p>	<p>During all ground-disturbing activities and after resources are identified</p>	<p>City of Antioch Community Development Department</p>	<p>Initiated in the event that a find is made during construction</p>	<p>During regularly scheduled site inspections initiated after a find is made during construction</p>	<p>Initials: _____ Date: _____</p>

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<p>appropriate.</p> <p>The project applicant shall inform its contractor(s) of the sensitivity of the project site for paleontological resources and shall verify that the following directive has been included in the appropriate contract documents:</p> <p><i>“The subsurface of the construction site may be sensitive for fossils. If fossils are encountered during project subsurface construction, 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. Fossils can include plants and animals, and such trace fossil evidence of past life as tracks or plant imprints. 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. Contractor acknowledges and understands that excavation or removal of paleontological material is prohibited by law and constitutes a misdemeanor under California Public Resources Code, Section 5097.5.”</i></p>						
<p>3.9 HAZARDS AND HAZARDOUS MATERIALS</p>						
<p>Mitigation Measure HAZ-1: Prior to the issuance of grading permits, a limited soil, gas and groundwater investigation shall be conducted at the site to determine whether regulated contaminants are present in the site subsurface at levels above established construction worker screening levels. Any soil with concentration levels that exceed California State Title 26 threshold limits would be classified as a hazardous material. Once the soil sampling analysis is complete, a report of the findings shall be provided to the City of Antioch for review prior to issuance of grading</p>	<p>Project Applicant</p>	<p>Prior to issuance of a grading permit</p>	<p>City of Antioch Community Development Department</p>	<p>Review and approval of soil sampling analysis and Site Management Plan</p>	<p>Before the start of construction</p>	<p>Initials: _____ Date: _____</p>

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<p>permits. If contaminated soils are found in concentrations above established thresholds for worker safety, a Site Management Plan (SMP) shall be prepared by a qualified hazardous materials consultant to establish management practices for handling contaminated soil or other materials encountered during construction activities.</p>						
<p>3.10 HYDROLOGY AND WATER QUALITY</p>						
<p>Mitigation Measure HYD-1: Prior to construction, the project applicant shall prepare and implement a Final SWPPP, meeting Construction General Permit requirements (State Water Resources Control Board Order No. 2009-000-DWQ, as amended) designed to reduce potential adverse impacts to surface water quality through the project construction period. The Final SWPPP shall be submitted to the Planning Manager of the City of Antioch Planning Department for review and approval prior to the issuance of any permits for ground-disturbing activity.</p> <p>The Final SWPPP shall be prepared by a Qualified SWPPP Developer in accordance with the requirements of the Construction General Permit. Requirements include BMPs for erosion and sediment control, site management/housekeeping/waste management, management of non-storm water discharges, run-on and runoff controls, and BMP inspection/maintenance/repair activities. BMP implementation shall be consistent with the BMP requirements in the most recent version of the California Stormwater Quality Association <i>Stormwater Best Management Handbook-Construction</i>.</p> <p>The Final SWPPP shall include a construction site monitoring program that identifies requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the Risk Level), sampling of the site effluent and receiving waters. A</p>	<p>Project Applicant/ Construction Manager</p>	<p>Prior to approval of the grading plan</p>	<p>City of Antioch Community Development Department</p>	<p>SWPPP review and approval</p>	<p>Before start of construction</p>	<p>Initials: _____ Date: _____</p>

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<p>Qualified SWPPP Practitioner shall be responsible for implementing the BMPs at the site and performing all required monitoring and inspection/maintenance/repair activities.</p>						
<p>Mitigation Measure HYD-2: The project applicant shall fully comply with the Water Board storm water permit requirements, including Contra Costa County C.3 Storm water Standards. The project applicant shall prepare and implement a Storm water Control Plan (SCP) for the project. The SCP shall be submitted to the Planning Manager of the City of Antioch Planning Department for review and approval prior to issuance of any permits for ground disturbing activities. The SCP would act as the overall program document designed to provide measures to mitigate potential water quality impacts associated with the operation of the proposed project. The SCP shall provide measures that are consistent with those of the California State Water Boards Cannabis Cultivation Policy to ensure that cannabis production on site mitigates potential water quality issues. At a minimum, the SCP for the project shall include:</p> <ul style="list-style-type: none"> ● An inventory and accounting of existing and proposed impervious areas. ● Low Impact Development (LID) design details incorporated into the project. Specific LID design may include, but is not limited to using pervious pavements and green roofs, dispersing runoff to landscaped areas, and/or routing runoff to the storm water basin that would be developed on site as part of the project design. ● Measures to address potential storm water contaminants. These may include measures to cover or 	<p>Project Applicant/ Project Engineer</p>	<p>Prior to approval of the final grading plan</p>	<p>City of Antioch Community Development Department</p>	<p>Stormwater Control Plan review and approval</p>	<p>Before start of construction</p>	<p>Initials: _____ Date: _____</p>

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<p>control potential sources of storm water pollutants at the project site.</p> <ul style="list-style-type: none"> A Final Storm Water Facility Operation and Maintenance Plan for the project site, which shall include periodic inspection and maintenance of the storm drainage system. Persons responsible for performing and funding the requirements of this plan shall be identified. This plan must be finalized prior to issuance of building permits for the project. 						
3.13 NOISE						
<p>Mitigation Measure NOI-1: Construction Noise. Prior to commencement of construction activities, City staff shall verify that grading and construction plans include the following requirements to ensure that the greatest distance between noise sources and sensitive receptors during construction activities has been achieved:</p> <ul style="list-style-type: none"> Construction activities occurring as part of the project shall be subject to the limitations and requirements of the City of Antioch Municipal Code, which states that construction activities are prohibited between the hours of 6:00 p.m. and 7:00 a.m. on weekdays and between 5:00 p.m. and 9:00 a.m. on weekends and holidays. During all project area excavation and on-site grading, the project contractors shall equip all construction equipment, fixed or mobile, with properly operating and maintained mufflers consistent with manufacturers' standards. 	Project Applicant/ Construction Manager	During the construction period	City of Antioch Community Development Department	Construction schedule review and approval	During construction	Initials: _____ Date: _____

Source: LSA (2021).