

## 5.0 Mitigation Monitoring and Reporting Plan

The California Environmental Quality Act (CEQA) requires that all public agencies establish monitoring and/or reporting procedures for mitigation adopted as conditions of approval in order to mitigate or avoid significant environmental impacts. This Mitigation Monitoring and Reporting Program (MMRP) has been developed to provide a vehicle by which to monitor mitigation measures (MMs) outlined in the Deer Ridge and Shadow Lakes Community Improvement Plan Final Environmental Impact Report (EIR), State Clearinghouse No. 2017082023. The Deer Ridge and Shadow Lakes Community Improvement Plan MMRP has been prepared in conformance with Section 21081.6 of the Public Resources Code and City of Brentwood Monitoring Requirements. Specifically, Section 21081.6 states:

- (a) When making findings required by paragraph (1) of subdivision (a) of Section 21081 or when adopting a mitigated negative declaration pursuant to paragraph (2) of subdivision (c) of Section 21080, the following requirements shall apply:
  - (1) The public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation. For those changes which have been required or incorporated into the project at the request of a responsible agency or a public agency having jurisdiction by law over natural resources affected by the project, that agency shall, if so requested by the lead or responsible agency, prepare and submit a proposed reporting or monitoring program.
  - (2) The lead agency shall specify the location and custodian of the documents or other material which constitute the record of proceedings upon which its decision is based.

CEQA Guidelines Section 15097 provides clarification of mitigation monitoring and reporting requirements and guidance to local lead agencies on implementing strategies. The reporting or monitoring program must be designed to ensure compliance during project implementation. The City of Brentwood is the Lead Agency for the Deer Ridge and Shadow Lakes Community Improvement Plan and is therefore responsible for implementing the MMRP. The MMRP has been drafted to meet the requirements of Public Resources Code Section 21081.6 as a fully enforceable monitoring program.

The MMRP is comprised of the Mitigation Program and includes measures to implement and monitor the Mitigation Program. The MMRP defines the following for each MM identified in Table 1, *Mitigation Monitoring Requirements*:

- Definition of Mitigation (MM). The mitigation measure contains the criteria for mitigation, either in the form of adherence to certain adopted regulations or identification of the steps to be taken in mitigation.
- Responsible Party or Inspector. Unless otherwise indicated, the Applicant is the responsible party for implementing the mitigation, and the City of Brentwood or a designated representative is responsible for monitoring the performance and implementation of the mitigation measures. To guarantee that the mitigation will not be inadvertently overlooked, a supervising public official acting as the Inspector is the official who grants the permit or authorization called for in the performance. Where more than one official is identified, permits or authorization from all officials shall be required.
- Time Frame. In each case, a time frame is provided for performance of the mitigation or the review of evidence that mitigation has taken place. The performance points selected are designed to ensure that impact-related components of project implementation do not proceed without establishing that the mitigation is implemented or ensured. All activities are subject to the approval of all required permits from agencies with permitting authority over the specific activity.

The numbering system in Table 1 corresponds with the numbering system used in the Final EIR. The last column of the MMRP table will be used by the parties responsible for documenting when implementation of the mitigation measure has been completed. The ongoing documentation and monitoring of mitigation compliance will be completed by the City of Brentwood. The completed MMRP and supplemental documents will be kept on file at the City of Brentwood Community Development Department, Planning Division.

## 5.1 Mitigation Monitoring and Reporting Plan

The MMRP contained herein is has been prepared to satisfy the requirements of CEQA as they relate to the Deer Ridge and Shadow Lakes Community Improvement Plan EIR prepared by the City of Brentwood. This MMRP is intended to be used by City staff and mitigation monitoring personnel to ensure compliance with the mitigation measures identified in the EIR during project implementation.

The Deer Ridge and Shadow Lakes Community Improvement Plan EIR presents a detailed set of mitigation measures that will be implemented throughout the lifetime of the project. Mitigation is defined by CEQA as a measure which:

- Avoids the impact altogether by not taking a certain action or parts of an action;
- Minimizes impacts by limiting the degree or magnitude of the action and its implementation;
- Rectifies the impact by repairing, rehabilitating, or restoring the impacted environment;

- Reduces or eliminates the impact over time by preservation and maintenance operations during the life of the project; or
- Compensates for the impact by replacing or providing substitute resources or environments.

Pursuant to Section 15126.4 of the CEQA Guidelines, mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments. As noted above, the intent of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures and permit conditions. The MMRP will provide for monitoring of construction activities as necessary and where applicable, in-the-field identification and resolution of environmental concerns.

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Mitigation Monitoring Reporting Plan					
Impact Number	Environmental Impacts	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
<b>Aesthetics</b>					
AES-1	Compatibility with visual character of the site, including views to, from and across the project area, resulting in a significant impact to scenic vistas.	<p><b>MM AES-1:</b> Residential Design Guidelines: Prior to the issuance of building permits, the applicant shall demonstrate compliance with the City’s Residential Design Guidelines and applicable architectural review process. To achieve this, the following measures shall be required:</p> <ul style="list-style-type: none"> <li>▪ The applicant shall limit building heights to no greater than either the maximum roofline of adjacent single-family homes or to a height that maintains the existing line of sight from public locations to the scenic vistas listed on page 5-18 of the Draft EIR to demonstrate consistency and conformity with surrounding single-family neighborhoods;</li> <li>▪ The applicant shall decrease building bulk and mass through the use of smaller buildings and other design techniques to create a smaller clustered building appearance;</li> <li>▪ To reduce the effects of building massing and intensity, the project design shall include vertical and horizontal façade variations, color, and texture changes, and decorative features to break up uniform wall planes and to achieve a look characteristic of the surrounding area; and</li> </ul>	Community Development Director	Prior to the issuance of building permits	

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		<ul style="list-style-type: none"> <li>The applicant shall (1) further remove vehicular circulation and parking from the center of Village One and improve this area with private recreation and open space facilities or otherwise improve the circulation and parking located in the center of Village One with landscaping sufficient to mitigate the identified impacts, and (2) remove the two-central wing extensions of the two western most Village Two buildings into the open space areas and improve these areas with private recreation and open space facilities, or otherwise address the overall massing of the site through site plan revisions.</li> </ul>			
AES-3	Impacts to visual character or quality of the site and its surroundings.	Refer to MM AES-1.	Community Development Director	Prior to the issuance of building permits	
AES-4	Impacts to day and or nighttime views in the area due to a new source of light and glare.	<p><b>MM AES-2:</b> Exterior Lighting Control Plan: To minimize the potential adverse impact associated with light and glare, the project applicant for any future housing facility shall submit an exterior lighting control plan, which must be reviewed and approved by the Planning Commission in conjunction with a formal design review application on the project site.</p> <p>The project applicant shall design and install all permanent exterior lighting and all temporary construction lighting such that: (a) lamps and reflectors are not directly visible from beyond the</p>	<p>Community Development Director</p> <p>Community Development Director</p>	<p>Prior to the issuance of building permits</p> <p>Prior to final inspection or certificate of occupancy</p>	

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		<p>project site, as is feasible; (b) lighting does not cause excessive reflected glare; (c) direct lighting does not illuminate the nighttime sky; (d) illumination of the project and its immediate vicinity is minimized; and (e) the lighting mitigation plan complies with all relevant local policies and ordinances.</p> <p>The exterior lighting control plan shall include the following:</p> <ul style="list-style-type: none"> <li>▪ A photometric study that demonstrates spillover horizontal foot-candle (fc) levels do not exceed 1.0 fc at the project site boundary;</li> <li>▪ Identification of the location and direction of light fixtures that take the lighting control requirements into account;</li> <li>▪ Lighting design that considers setbacks of project features from the site boundary to aid in satisfying the lighting control requirements;</li> <li>▪ Lighting design that incorporates fixture hoods/shielding, with light directed downward or toward the area to be illuminated;</li> <li>▪ Light fixtures that are visible from beyond the project boundary shall have cutoff angles that are sufficient to prevent lamps and reflectors from being visible beyond the project boundary, except where necessary for security;</li> </ul>			

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		<ul style="list-style-type: none"> <li>▪ All lighting shall be of minimum necessary brightness consistent with operational safety and security; and</li> <li>▪ Lights in high illumination areas not occupied on a continuous basis shall have (in addition to hoods) switches, timer switches, or motion detectors so that the lights operate only when the area is occupied.</li> </ul>			
AES-5	Cumulative Impact to aesthetics.	Refer to MM AES-1 and MM AES-2.	Refer to Impacts AES-1 to AES-4	Refer to Impacts AES-1 to AES-4	
Air Quality					
AQ-2	Impacts to any air quality standards or contribute to an existing or projected air quality violation.	<p><b>MM AQ-1:</b> Prior to any grading activities, the applicant shall prepare and implement a Construction Management Plan that includes the BAAQMD Basic Construction Mitigation Measures to minimize construction-related emissions. This shall plan shall first be reviewed and approved by the Director of Public Works/City Engineer.</p> <p>The BAAQMD Basic Construction Mitigation Measures are:</p> <ol style="list-style-type: none"> <li>1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li> <li>2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power</li> </ol>	Director of Public Works/City Engineer	Prior to any grading activities	



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		<p>vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</p> <p>4. All vehicle speeds on unpaved roads shall be limited to 15 mph.</p> <p>5. 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.</p> <p>6. 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 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> <p>7. 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.</p> <p>8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.</p>			

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<b>Biological Resources</b>					
BIO-1a	Impacts on the California Tiger Salamander.	<p><b>MM BIO-1.1:</b> As required by the ECCC HCP/NCCP, the applicant shall provide written notification to the USFWS and the CDFW regarding construction timing and likelihood of California Tiger Salamander presence prior to any ground disturbance. A copy of this notification shall also be provided to the Brentwood Community Development Department.</p> <p>The project applicant shall provide written notification to the USFWS, the CDFW, and the Implementing Entity, including photos and breeding habitat assessment, prior to the disturbance of any suitable breeding habitat. The project applicant shall also notify these parties of the approximate date of any work to occur near breeding habitat at least 30 days prior to such removal to allow the USFWS or CDFW staff to translocate individuals, if requested.</p> <p>The USFWS or CDFW must notify the project proponent of their intent to translocate any affected California tiger salamanders within 14 days of receiving notice from the project applicant, who must allow the USFWS or CDFW access to the site prior to construction if requested.</p>	Community Development Director, United States Fish and Wildlife Service, California Department of Fish and Wildlife	Prior to the disturbance of any suitable breeding habitat	
BIO-1b	Impacts on the California Red-Legged Frog.	<p><b>MM BIO-1.2:</b> As required by the ECCC HCP/NCCP, the applicant shall provide written notification to the USFWS and the CDFW regarding construction timing and likelihood of California red-legged frog presence prior to any ground disturbance. A copy of this notification shall also be provided to the</p>	Community Development Director, United States Fish and Wildlife Service, California Department of Fish and Wildlife	Prior to the disturbance of any suitable breeding habitat	

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		<p>Community Development Department.</p> <p>The project applicant shall provide written notification to the USFWS, the CDFW, and the Implementing Entity, including photos and habitat assessment, prior to the disturbance of any suitable breeding habitat. The project applicant shall also notify these parties of the approximate date of removal of such breeding habitat at least 30 days prior to such removal to allow the USFWS or CDFW staff to translocate individuals, if requested.</p> <p>The USFWS or CDFW must notify the project proponent of their intent to translocate California any red-legged frog within 14 days of receiving notice from the project proponent. The applicant must allow the USFWS or CDFW access to the site prior to construction if they request it.</p>			
BIO-1c	Impacts on Western Pond Turtles.	<p><b>MM BIO-1.3:</b> The applicant shall conform with conditions of the ECCC HCP/NCCP to minimize impacts to western pond turtle though habitat avoidance and payment of applicable impact fees, prior to any ground disturbance.</p> <p>While the ECCC HCP/NCCP does not provide species-level avoidance and minimization measures for the western pond turtle, the project applicant would be required to adhere to general conditions of the ECCC HCP/NCCP as described for the California tiger salamander, which would help to reduce proposed project impacts on the western pond turtle and its habitats. In addition, the project applicant shall pay any applicable ECCC HCP/NCCP</p>	Community Development Director	Prior to any ground disturbance	

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		impact fees, which would be used to fund the conservation program, which includes habitat acquisition, restoration, preservation, and management targeted at the western pond turtle.			
BIO-1d	Impacts on the Burrowing Owl.	<p><b>MM BIO-1.4a:</b> The applicant shall hire a qualified biologist to conduct preconstruction surveys for western burrowing owl prior to any ground disturbing activities on the project site. These surveys shall be submitted to the Community Development Department and the East Contra Costa County Habitat Conservancy for review and approval.</p> <p>Prior to any ground disturbance related to covered activities, the project applicant shall have a USFWS/CDFW- approved biologist conduct a preconstruction survey in areas identified in the planning surveys as having potential burrowing owl habitat. The surveys would establish the presence or absence of western burrowing owl and/or habitat features and evaluate use by owls in accordance with CDFW survey guidelines (California Department of Fish and Game 1995).</p>	Qualified Biologist, Community Development Director, and East Contra Costa County Habitat Conservancy	Prior to any ground disturbance related to covered activities	
		<p><b>MM BIO-1.4b:</b> The applicant shall conduct construction monitoring for western burrowing owl for activities occurring between February 1 and August 31, and establish construction buffer zones around active nests.</p> <p>If burrowing owls are found during the breeding season (February 1 – August 31), the project applicant shall avoid all nest sites that could be</p>	Qualified Biologist and Community Development Director	During the breeding season (February 1 and August 31)	

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		<p>disturbed by construction during the remainder of the breeding season or while the nest is occupied by adults or young. Avoidance shall include establishment of a non-disturbance buffer zone (described below). Construction may occur during the breeding season if a qualified biologist monitors the nest and determines that the birds have not begun egg-laying and incubation or that the juveniles from the occupied burrows have fledged. During the nonbreeding season (September 1 – January 31), the project shall avoid the owls and the burrows they are using. Avoidance shall include the establishment of a buffer zone.</p> <p>During the breeding season, buffer zones of at least 250 feet in which no construction activities can occur would be established around each occupied burrow (nest site). Buffer zones of 160 feet would be established around each burrow being used during the nonbreeding season. The buffers would be delineated by highly visible, temporary construction fencing.</p> <p>If occupied burrows for burrowing owls cannot be avoided, passive relocation shall be implemented. Owls shall be excluded from burrows in the immediate impact zone and within a 160-foot buffer zone by installing one-way doors in burrow entrances. These doors shall be in place for 48 hours prior to excavation. The project site shall be monitored daily for 1 week to confirm that the owl</p>			

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		has abandoned the burrow. Whenever possible, burrows shall be excavated using hand tools and refilled to prevent reoccupation (California Department of Fish and Game 1995). Plastic tubing or a similar structure shall be inserted in the tunnels during excavation to maintain an escape route for any owls inside the burrow.			
BIO-1e	Impacts on the Swainson’s Hawk or other migratory birds.	<p><b>MM BIO-1.5a:</b> The applicant shall ensure that preconstruction surveys for Swainson’s hawk and other migratory birds are conducted by a qualified biologist for activities occurring between March 15 and September 15. These surveys shall be submitted to the Community Development Department and the East Contra Costa County Habitat Conservancy for review and approval.</p> <p>Prior to any ground disturbance related to covered activities that occurs during the nesting season (March 15 – September 15), a qualified biologist shall conduct a preconstruction survey no more than 30 days prior to construction to establish whether Swainson’s hawk nests within 1,000 feet of the project site are occupied. If potentially occupied nests within 1,000 feet are off the project site, then their occupancy would be determined by observation from public roads or by observations of Swainson’s hawk activity (e.g., foraging) near the project site. If nests are occupied, minimization measures and construction monitoring are required (see below).</p>	Qualified Biologist, Community Development Director and East Contra Costa County Habitat Conservancy	Prior to any ground disturbance related to covered activities that occurs during the nesting season (March 15 – September 15)	

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		<p><b>MM BIO-1.5b:</b> The applicant shall conduct construction monitoring for activities that occur between March 15 and September 15 to prevent nest abandonment by migratory birds and birds of prey during nesting season.</p> <p>During the nesting season (March 15 – September 15), covered activities within 1,000 feet of occupied nests or nests under construction shall be prohibited to prevent nest abandonment. If site-specific conditions or the nature of the covered activity (e.g., steep topography, dense vegetation, limited activities) indicate that a smaller buffer could be used, the Implementing Entity shall coordinate with CDFW/USFWS to determine the appropriate buffer size.</p> <p>If young fledge prior to September 15, covered activities can proceed normally. If the active nest site is shielded from view and noise from the project site by other development, topography, or other features, the project applicant can apply to the Implementing Entity for a waiver of this avoidance measure. Any waiver must also be approved by the USFWS and CDFW. While the nest is occupied, activities outside the buffer can take place.</p> <p>All active nest trees shall be preserved on site, if feasible. Nest trees, including non-native trees, lost to covered activities shall be mitigated by the project proponent according to the requirements below.</p>	<p>Qualified Biologist, United States Fish and Wildlife Service, California Department of Fish and Wildlife, and Community Development Director</p>	<p>During the nesting season (March 15 – September 15)</p>	

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		<p><b>MM BIO-1.5c:</b> The applicant shall mitigate the loss of any Swainson’s hawk nest trees by replanting 15 saplings for every tree lost and pay appropriate fees to the implementing entity or establish a five-year monitoring plan.</p> <p>The loss of non-riparian Swainson’s hawk nest trees shall be mitigated by the project applicant by:</p> <ul style="list-style-type: none"> <li>▪ If feasible on-site, planting 15 saplings for every tree lost with the objective of having at least 5 mature trees established for every tree lost according to the requirements listed below.</li> </ul> <p>AND, either:</p> <ul style="list-style-type: none"> <li>▪ The project applicant shall pay the Implementing Entity an additional fee to purchase, plant, maintain, and monitor 15 saplings on the HCP/NCCP Preserve System for every tree lost according to the requirements listed below, OR</li> <li>▪ The project applicant shall plant, maintain, and monitor 15 saplings for every tree lost at a site to be approved by the Implementing Entity (e.g., within an HCP/NCCP Preserve or existing open space linked to HCP/NCCP preserves), according to the requirements listed below.</li> </ul> <p>The following requirements shall be met for all planting options:</p> <ul style="list-style-type: none"> <li>▪ Tree survival shall be monitored at least</li> </ul>	Qualified Biologist and Community Development Director	Prior to issuance of building permits	



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		<p>annually for 5 years, then every other year until year 12. All trees lost during the first 5 years shall be replaced. Success would be reached at the end of 12 years if at least 5 trees per tree lost survive without supplemental irrigation or protection from herbivory. Trees must also survive for at least three years without irrigation.</p> <ul style="list-style-type: none"> <li>▪ Irrigation and fencing to protect from deer and other herbivores may be needed for the first several years to ensure maximum tree survival.</li> <li>▪ Native trees suitable for this site shall be planted. When site conditions permit, a variety of native trees would be planted for each tree lost to provide trees with different growth rates, maturation, and lifespan, and to provide a variety of tree canopy structures for Swainson’s hawk. This variety would help to ensure that nest trees would be available in the short term (5-10 years for cottonwoods and willows) and in the long term (e.g., Valley oak, sycamore). This would also minimize the temporal loss of nest trees.</li> <li>▪ Riparian woodland restoration conducted as a result of covered activities (i.e., loss of riparian woodland) can be used to offset the nest tree planting requirement above, if the nest trees are riparian species.</li> </ul>			

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		<ul style="list-style-type: none"> <li>▪ Whenever feasible and when site conditions permit, trees shall be planted in clumps together or with existing trees to provide larger areas of suitable nesting habitat and to create a natural buffer between nest trees and adjacent development (if plantings occur on the development site).</li> <li>▪ Whenever feasible, plantings on the site shall occur closest to suitable foraging habitat outside the UDA.</li> </ul> <p>Trees planted in the HCP/NCCP preserves or other approved off-site location would occur within the known range of Swainson’s hawk in the inventory area and as close as possible to high-quality foraging habitat.</p>			
BIO-4	Impacts to native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.	<p><b>MM BIO-2a:</b> To avoid impacts to migratory birds, the project applicant shall schedule construction activities to occur outside of the nesting season. To the extent feasible, construction activities will be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds, including most raptors, in the project region extends from February 1 through August 31.</p>	Qualified Biologist and Community Development Director	If site disturbance commences during the nesting season (February 1 through August 15) or preconstruction survey.	
		<p><b>MM BIO-2b:</b> To avoid impacts to migratory birds, the project applicant shall retain a qualified biologist to conduct preconstruction/pre-</p>	Qualified Biologist, Qualified Ornithologist, and	Between September 1 and	

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		<p>disturbance surveys for nesting birds as required by the ECCC HCP/NCCP.</p> <p>In the event it is not possible to schedule construction activities between September 1 and January 31, then preconstruction surveys for nesting birds will be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. During this survey, the ornithologist will inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and immediately adjacent to the impact areas for nests. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist will determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that no nests of species protected by the MBTA and California Fish and Game Code will be disturbed during project implementation.</p>	Community Development Director	January 31	
BIO-5	Impacts to the City of Brentwood’s policies and ordinances protecting biological services, such as a tree preservation policy or ordinance.	<p><b>MM BIO 2:</b> The applicant shall hire a qualified arborist to prepare a Tree Removal, Protection, and Replacement Plan (TRPRP) and include on all project plans, any oak trees to be removed, avoided, or protected within the Deer Ridge portion of the project site.</p> <p>All oak trees to be removed, avoided, or protected shall be depicted on project plans. A TRPRP shall be generated by an arborist to include all removed, avoided, or protected trees on the project site.</p>	Qualified Arborist and Community Development Director	Prior to construction	

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		Protected oak trees may require the establishment of Tree Protection Zones according to the Municipal Code and arborist recommendations, which at a minimum shall include the installation of a fence 1.0 foot outside the tree dripline. All oak trees to be removed on the project site that meet the Municipal Code requirements shall be replaced within the new development as per the requirements of the Municipal Code.			
BIO-7	Cumulative impacts to biological resources.	Refer to MM BIO 1.1-1.5c, MM BIO 2a-2b, and MM BIO 2.	Refer to Impact BIO 1a-1e, BIO-4, BIO-5	Refer to Impact BIO 1a-1e, BIO-4, BIO-5	
Cultural Resources					
CR-1	Impacts to a historical resource as defined in the State CEQA Guidelines Section 15064.5.	<p><b>MM CR-1:</b> Prior to ground disturbing activities, the developer shall ensure that a qualified archaeologist, who meets the Secretary of the Interior’s Standards for professional archaeology, provide construction personnel with training in the protocols to be taken in the event cultural resources are encountered within the project site.</p> <p>If construction or grading activities result in the discovery of historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Department shall be notified, the resource shall be examined by a qualified archaeologist, for appropriate protection and preservation measures. The qualified archaeologist shall meet the Secretary of the Interior’s Standards for professional archaeology. Work may only resume when appropriate</p>	Qualified Archaeologist and Community Development Director	Prior to ground disturbing activities	

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		protections are in place and have been approved by the Community Development Department.			
CR-2	Impacts to archaeological discoveries.	<p>Refer to MM CR-1, and including:</p> <p><b>MM CR-2:</b> Prior to ground disturbing activities, the developer shall ensure that a qualified archaeologist, who meets the Secretary of the Interior’s Standards for professional archaeology is available to monitor all grading activities during construction for the presence of cultural resources.</p> <p>A qualified archaeologist, who meets the Secretary of the Interior’s Standards for professional archaeology, shall monitor all grading and excavation activities. If construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts or unique paleontological resources, all work within 100 feet of the discovery shall cease, the Community Development Director shall be notified, the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Community Development Director.</p>	Archaeologist and Community Development Director	Prior to ground disturbing activities	
CR-3	Impacts to a unique paleontological resource or site or unique geologic feature.	Refer to MM CR-2.	Refer to Impact CR-2	Refer to Impact CR-2	
CR-4	Impacts to human remains, including those interred outside of dedicated	<b>MM CR-3:</b> Prior to ground disturbance, the applicant shall ensure that protocols related to the discovery of human remains are in place and	Community Development Director and Contra Costa	Prior to ground disturbance	

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	cemeteries.	followed during construction of the proposed project. If human remains are encountered during construction, work in that area must cease and the Contra Costa County Coroner must be notified immediately. If the remains are determined to be Native American, then the Native American Heritage Commission (NAHC) is to be notified within 24 hours as required by Public Resources Code 5097. The NAHC will notify the designated Most Likely Descendant who will provide recommendations for the treatment of the remains within 48 hours.	County Coroner		
CR-5	Impacts to Tribal Cultural Resources.	Refer to MMs CR-1, CR-2 and CR-3.	Refer to Impact CR-1, CR-2 and CR-3	Refer to Impact CR-1, CR-2 and CR-3	
CR-6	Cumulative Impact to cultural resources.	Refer to MMs CR-1, MM CR-2, and MM CR-3.	Refer to Impact CR-1, CR-2 and CR-3	Refer to Impact CR-1, CR-2 and CR-3	
Geology and Soils					
GEO-1	Impacts to future development within the project site that may expose people or structures to potential adverse effects associated with a seismic event, including strong shaking and seismic-related ground failure ground.	<b>MM GEO-1:</b> The applicant shall prepare a design-level geotechnical investigation and a final geotechnical report with site-specific recommendations, which must be reviewed and approved by the City of Brentwood prior to issuance of any grading permit. All recommended remedial grading measures identified in the ENGEO reports dated April 6, 1990 and June 10, 1999 shall be updated to reflect current building code requirements, and be implemented unless	Director of Public Works/City Engineer	Prior to any excavation activities and/or the placement of fill on the Deer Ridge and Shadow Lakes sites	

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		<p>alternative techniques developed by a certified geotechnical engineer or engineering geologist are identified as part of the final geotechnical report.</p> <p>Prior to any excavation activities and/or the placement of fill on the Deer Ridge and Shadow Lakes sites, the project applicant shall retain a registered geotechnical engineer to prepare a design level geotechnical investigation. The design-level geotechnical report shall address, but not be limited to, site preparation and grading, evaluation of subgrade soils, building foundations, CBC seismic design parameters, and the need for conducting any additional subsurface explorations to determine foundation types.</p> <p>The design-level geotechnical report shall be prepared and submitted in conjunction with building permit applications and reviewed and approved by the City of Brentwood. Recommendations from the design-level geotechnical report shall be incorporated into the final project design and construction documents for each phase of the proposed project.</p>			
GEO-3	Impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapse.	<p>Refer to MM GEO-1, and including:</p> <p><b>MM GEO-2:</b> Prior to issuance of a grading permit for any development associated with the Deer Ridge portion of the project site, the project applicant shall retain an Engineering Geologist and Geotechnical Engineer to review proposed building footprints to validate or modify the recommendations as stated for the 1999 ENGEO Geotechnical Exploration Report and new</p>	Engineering Geologist, Geotechnical Engineer, and Director of Public Works/City Engineer	Prior to issuance of a grading permit	

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Impact Number	Environmental Impacts	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p>development underlain by old coal mining voids be sealed and repaired should mines be located.</p> <p>Prior to any excavation activities and/or the placement of fill on the Deer Ridge site, a certified geotechnical engineer shall be retained by the project applicant to evaluate subgrade soils, including any additional subsurface explorations, to determine final foundation types. Additionally, as recommended in the 2017 ENGEO Technical Memorandum, building footprint areas for the proposed structures should be explored prior to construction to confirm that no mines are located under the proposed structures. Final techniques shall be (a) developed by the certified geotechnical engineer and (b) reviewed by the City prior to issuance of a grading permit.</p> <p>Prior to issuance of any grading permits in the areas subject to potential collapse within the Deer Ridge portion of the project site, the project applicant shall retain and Engineering Geologist and the Geotechnical Engineer to seal and repair old coal mining voids not previously repaired during site construction of the two golf courses, subject to review by the City of Brentwood. The preferable form of repair in areas of shallow voids would be to sub excavate and recompact or remove by cut. Special foundation treatment may be necessary in areas adjacent to the hoisting slopes should structure be located in the project area. Treatment may include sub excavation, placement of a steel or concrete system to seal off the hoisting slope at a certain depth, followed by</p>			



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		placement and compaction of fill to necessary grades.			
GEO-4	Impacts related to expansive soil.	Refer to MM GEO-1.	Refer to Impact GEO-1	Refer to Impact GEO-1	
GEO-6	Cumulative Impact on geology and soils.	Refer to MM GEO 1-	Refer to Impact GEO-1	Refer to Impact GEO-1	
Hazards & Hazardous Materials					
HAZ-1	Impacts to the public or the environment through the routine transport, use, or disposal of hazardous materials.	<p><b>MM HAZ-1:</b> The developer shall prepare and implement a Hazardous Materials Risk Management Plan for the proposed project. This plan shall be reviewed and approved by the Contra Costa County Environmental Health Department and the City of Brentwood prior to implementation.</p> <p>Facilities that store, handle, or use regulated substances as defined in the California Health and Safety Code 25532 (g) in excess of threshold quantities shall prepare and implement, as necessary, risk management plans (RMP) for determination of risks to the community. The RMP will be reviewed and approved by the Contra Costa County Environmental Health Department (EHD) through the Certified Unified Program Agencies (CUPA) process.</p>	Contra Costa County Environmental Health Department, Community Development Director, and Director of Public Works/City Engineer	Prior to implementation of proposed project	
		<p><b>MM HAZ-2:</b> Prior to issuance of any grading permits associated with development of the project site, the applicant shall prepare and implement a Site Damage-Prevention Plan. This plan shall be reviewed and approved by the Contra</p>	Contra Costa County Environmental Health Department, Director of Public Works/City Engineer, PG&E,	Prior to issuance of any grading permits	

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		<p>Costa County Environmental Health Department and the City of Brentwood.</p> <p>Prior to issuance of grading permits, the applicant shall work with the pipeline operators (PG&amp;E, Kinder Morgan, Chevron, and California Resources Center) to implement a site damage-prevention plan to the satisfaction of the City of Brentwood Public Works Department. This may potentially include the following:</p> <ul style="list-style-type: none"> <li>▪ Designing a site development plan incorporating permanent land use over the pipeline right-of-way that minimizes the potential for damage to the lines (as discussed above, this is already an integrated plan design feature, but is listed here because it is an important component of a damage prevention plan);</li> <li>▪ Prominently marking the line locations prior to site development, maintaining markings throughout the development process, and final marking after work is complete;</li> <li>▪ Communicate plans for significant excavation or land contouring work;</li> <li>▪ Identify changes in land contour that could significantly reduce the soil cover over the pipelines;</li> <li>▪ Evaluate the effects of heavy construction vehicles crossing the lines, designate areas for heavy construction vehicles to cross the lines, and provide temporary fill or</li> </ul>	Kinder Morgan, Chevron, and California Resources Center		

Mitigation Monitoring Reporting Plan					
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		<p>other temporary protection over the lines where necessary;</p> <ul style="list-style-type: none"> <li>▪ Minimize installations of new buried utilities and services across the existing pipelines;</li> <li>▪ Evaluate whether the existing lines should be lowered to increase vertical separation between the pipelines and new surface features; and</li> <li>▪ Develop other damage-prevention measures as may be necessary.</li> </ul> <p>In addition to the damage prevention measures listed above, the applicant and the pipeline operators shall implement other applicable measures for reducing risk suggested in the Pipelines and Informed Planning Alliance (PIPA) recommended practices on informed land use. PIPA recommended practices are not “mandated,” but they are best management practices intended to reduce risk and enhance pipeline safety.</p>			
HAZ-3	Impacts related to hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	Refer to MM HAZ-1 and MM HAZ-2.	Refer to Impact HAZ-1	Refer to Impact HAZ-1	

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<b>Hydrology &amp; Water Quality</b>					
HYD-1	Impacts related water quality standards or waste discharge requirements.	<p><b>MM HYD-1:</b> Prior to issuance of any grading permit, the applicant shall demonstrate to the City of Brentwood compliance with NPDES General Construction Activities Storm Water Permit Requirements established by the Clean Water Act (CWA), including the preparation of a Storm Water Pollution Prevention Plan (SWPPP).</p> <p>The SWPPP shall identify specific types and sources of stormwater pollutants, determine the location and nature of potential impacts inclusive of soil movement to other golf holes within both Deer Ridge and Shadow Lakes, and specify appropriate control measures to eliminate any potentially significant impacts on receiving water quality from stormwater runoff. The SWPPP shall comply with the most current standards established by the San Francisco RWQCB. Best Management Practices shall be selected from a menu according to site requirements and shall be subject to approval by the City Engineer and San Francisco RWQCB.</p> <p><b>MM HYD-2:</b> Prior to issuance of any grading permit, the project applicant shall submit to the City Engineer for review a draft copy of the Notice of Intent (NOI) and SWPPP.</p> <p>Owners of new construction must file a complete Notice of Intent (NOI) package and develop a Storm Water Pollution Prevention Plan (SWPPP) in accordance with Section A of the General Permit prior to the commencement of soil disturbing activities. A Waste Discharger Identification (WDID)</p>	Director of Public Works/City Engineer	Prior to issuance of any grading permit	
			Director of Public Works/City Engineer	Prior to issuance of any grading permit	

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		<p>number will be issued to within 10 business days after the State Water Board receives a complete NOI package (original signed NOI, vicinity map, and check).</p> <p>The applicant shall submit to the City Engineer for review a draft copy of the Notice of Intent (NOI) and SWPPP, prior to the issuance of any grading permit. After approval by the City, the NOI and SWPPP shall be sent to the State Water Resources Control Board for approval.</p>			
		<p><b>MM HYD-3:</b> The applicant shall prepare a Final Drainage Plan that demonstrates the project’s new stormwater drainage facilities satisfy the Regional Water Quality Control Board’s Municipal Regional Permit requirements.</p> <p>The project applicant shall prepare and submit a final drainage plan that demonstrates the ability of the planned on-site storm drainage to adequately collect onsite stormwater flows in accordance with all applicable standards and requirements, which must be reviewed and approved by the City of Brentwood prior to the issuance of grading and construction permits. The final drainage plan shall demonstrate that the new stormwater drainage facilities can satisfy the regional board’s Municipal Regional Permit (MRP) requirements by:                      Minimizing impervious surfaces, as feasible, and directing flows to Integrated Management Practices (IMPs); Integrating appropriately sized IMPs to ensure post-development flows do not exceed pre-development flows; and Incorporating</p>	Director of Public Works/City Engineer	Prior to issuance of any grading and construction permits	

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		bio-retention in combination with site planning, minimizing impervious areas, and dispersion of runoff to meet Low Impact Development (LID) requirements.			
HYD-3	Impacts related to drainage pattern of the area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.	Refer to MM HYD-1, MM HYD-2, and MM HYD-3.	Refer to Impact HYD-1	Refer to Impact HYD-1	
HYD-4	Impacts related to the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or which would off-site.	Refer to MM HYD-3.	Refer to Impact HYD-3	Refer to Impact HYD-3	
HYD-5	Impacts related to polluted runoff during operation of the project.	Refer to MM HYD-3.	Refer to Impact HYD-3	Refer to Impact HYD-3	
<b>Land Use &amp; Planning</b>					
LU-2	Impacts related to conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not	Refer to MM AES-1.	Refer to Impact AES-1	Refer to Impact AES-1	

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	limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.				
	<b>Noise &amp; Vibration</b>				
N-1	Impacts related to short-term construction noise.	<p><b>MM N-1:</b> The applicant shall require the construction contractor to implement construction noise reduction procedures to minimize construction-related noise impacts on nearby receptors to the extent feasible.</p> <p>To reduce the effects of construction-related noise, the project applicant shall include the following requirements in all construction contracts for the proposed project:</p>	Construction Contractor and Community Development Director	During construction	
		<p><b>N-1a:</b> Heavy Construction Activities. Per City Municipal Code 9.32.050, heavy construction activities shall be restricted to the hours of 7:00 AM and 3:30 PM, or until 5:30 PM with the express written approval of the City Engineer or designee Monday through Friday, 8:00 AM and 5:00 PM on Saturdays with written approval of the City Engineer or designee, and never on Sunday or City holidays. Outside carpentry construction shall be restricted to the hours of 7:00 AM and 7:00 PM Monday through Friday, 9:00 AM and 5:00 PM on Saturdays and never on Sunday or City holidays.</p>	Director of Public Works/City Engineer and Community Development Director	During construction	

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		<b>N-1b:</b> Construction Equipment. Properly maintain construction equipment and ensure that all internal combustion engine driven machinery with intake and exhaust mufflers and engine shrouds (if the equipment had such devices installed as part of its standard equipment package) that are in good condition and appropriate for the equipment. Equipment engine shrouds shall be closed during equipment operation. Contractor, shall maintain and tune-up all construction equipment to minimize noise emissions.	Construction Contractor and Community Development Director	Prior to initiation of any grading or construction activity and during construction	
		<b>N-1c:</b> Vehicle and Equipment Idling. Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.	Construction Contractor and Community Development Director	During construction	
		<b>N-1d:</b> Stationary Equipment. All noise-generating stationary equipment such as air compressors or portable power generators shall be located as far as possible from sensitive receptors. Temporary noise barriers shall be constructed to screen stationary noise generating equipment when located near adjoining sensitive land uses. Temporary noise barriers could reduce construction noise levels by 10 dBA.	Construction Contractor and Community Development Director	During construction	
		<b>N-1e:</b> Construction Route. All construction traffic to and from the project site shall be routed using designated truck routes where feasible. All construction-related heavy truck traffic in residential areas shall be prohibited where feasible.	Construction Contractor and Director of Public Works/City Engineer	During construction	



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Impact Number	Environmental Impacts	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<b>N-1f:</b> Workers’ Radios. All noise from workers’ radios shall be controlled to a point that they are not audible at sensitive receptors near the construction activity.	Construction Contractor and Community Development Director	During construction	
		<b>N-1g:</b> Construction Plan. Prior to issuance of any grading and/or building permits, the contractor shall prepare and submit to the City of Brentwood for approval a detailed construction plan identifying the schedule for major noise-generating construction activity.	Construction Contractor, Community Development Director, and Director of Public Works/City Engineer	Prior to issuance of any grading and/or building permits	
		<b>N-1h:</b> Disturbance Coordinator. A “noise disturbance coordinator” shall be designated by the contractor. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise disturbance coordinator shall determine the cause of the noise complaint (e.g. starting too early, bad muffler, etc.) and shall require that reasonable measures warranted to correct the problem be implemented. The coordinator shall post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.  MM N-1a specifies the hours in which heavy construction can occur. MMs N-1b through N-1d includes requirements for the proper maintenance and use of equipment; specifies the locations of stationary equipment; and places limits on engine idling. MM N-1e through N-1g require the use of a	Construction Contractor and Community Development Director	Prior to issuance of any grading and/or building permits	

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		designated truck route when feasible; limits workers radio volumes; and requires a detailed construction plan be prepared prior to construction. MM N-1h requires that a disturbance coordinator be designated for the project.			
		<p><b>MM N-2:</b> Prior to the issuance of any building permit, the applicant shall demonstrate compliance with the City’s Municipal Code pertaining to the types and placement of mechanical equipment.</p> <p>Prior to issuance of any building permit, the applicant shall demonstrate, to the satisfaction of the Community Development Department, compliance with the following:</p> <ul style="list-style-type: none"> <li>▪ To the extent possible, all mechanical equipment shall be oriented away from the nearest noise sensitive receptors; and</li> <li>▪ All mechanical equipment shall be screened and enclosed to minimize noise or the equipment shall be factory rated at a noise level that would comply with the noise limits set forth in the City’s Municipal Code.</li> </ul>	Community Development Director and Director of Public Works/City Engineer	Prior to the issuance of any building permit	
		<p><b>MM N-3:</b> The applicant shall demonstrate compliance with the City’s Municipal Code pertaining to the placement and operation of delivery truck loading and delivery areas.</p> <p>The applicant shall ensure that where a loading/delivery area is located within 250 feet of a residential use, all deliveries of goods and supplies;</p>	Community Development Director and Director of Public Works/City Engineer	Prior to the issuance of any building permit	

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		trash pick-up; and the operation of machinery or mechanical equipment which emits noise levels in excess of 60 dBA, as measured from the closest property line to the equipment, shall only be allowed between the hours of 7:00 AM and 10:00 PM, unless otherwise specified in a separate approval. The separate approval shall require a detailed acoustical study based on architectural plans to demonstrate that loading/delivery noise levels do not exceed the City's 60 dBA standard. If necessary, the acoustical study shall incorporate noise reduction measures to meet the City's standard. Approval of the detailed acoustical study shall be required prior to the issuance of any building permits.			
		<p><b>MM N-4:</b> The applicant shall ensure that the design and placement of all parking areas incorporate all feasible sound attenuation methods. This shall be reviewed by the City and approved by the Planning Commission in conjunction with any future design review application for senior housing facilities on the project site.</p> <p>Prior to the issuance of any building permit, the applicant shall ensure all feasible sound attenuation shall be incorporated into the parking areas (i.e., landscaping and brushed driving surfaces), such that noise from parking area has been minimized to the greatest extent practicable such that parking lot noise would not exceed the standards indicated in Brentwood Municipal Code Section 9.32.030 (Designated Noise Zones).</p>	Community Development Director	Prior to the issuance of any building permit	

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N-3	Impacts related to new sources of permanent noise in the project vicinity.	Refer to MM N-2, MM N-3, and MM N-4.	Refer to Impact N-1	Refer to Impact N-1	
N-4	Impacts related to a periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	Refer to MM N-1.	Refer to Impact N-1	Refer to Impact N-1	
N-7	Cumulative Impact related to noise impacts.	Refer to MM N-1, MM N-2, MM N-3, and MM N-4.	Refer to Impact N-1	Refer to Impact N-1	
Public Services, Utilities, and Service Systems					
PSR-1a	Impacts related to increased fire protection due to construction-related activities.	<p><b>MM PSR-1:</b> Prior to the issuance of grading or building permits, the applicant shall develop and implement a Fire Safety Plan for use during construction.</p> <p>The applicant shall submit the Fire Safety Plan, along with maps of the project site and access roads, to the city, the East Contra Costa Fire Protection District, and the Contra Costa County Fire Protection District for review and approval prior to the issuance of any building permit or grading permits. The Fire Safety Plan shall contain notification procedures and emergency fire precautions including, but not limited to, the following:</p> <ul style="list-style-type: none"> <li>a. All internal combustion engines, stationary and mobile, shall be equipped with spark arresters. Spark arresters shall be in good working order.</li> <li>b. Light trucks and cars with factory-installed (type)</li> </ul>	East Contra Costa Fire Protection District, Contra Costa County Fire Protection District, and Community Development Director	Prior to the issuance of grading or building permits	

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		<p>mufflers shall be used only on roads where the roadway is cleared of vegetation. Said vehicle types shall maintain their factory-installed (type) muffler in good condition.</p> <p>c. Fire rules shall be posted on the project bulletin board at the contractor’s field office and areas visible to employees.</p> <p>d. Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable materials.</p> <p>e. Personnel shall be trained in the practices of the Fire Safety Plan relevant to their duties. Construction personnel shall be trained and equipped to extinguish small fires in order to prevent them from growing into more serious threats.</p> <p>f. The project proponent shall make an effort to restrict use of chainsaws, chippers, vegetation masticators, grinders, drill rigs, tractors, torches, and explosives to outside of the official fire season. When the above tools are used, water tanks equipped with hoses, fire rakes, and axes shall be easily accessible to personnel.</p> <p>g. Smoking shall be prohibited in wildland areas and shall be limited to paved areas or areas cleared of all vegetation.</p> <p>h. The project proponent shall confer with the ECCFPD regarding the need to install water or dip tanks within the project site. Should dip tanks be required, the project proponent shall construct</p>			

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		<p>dip tanks as specified by the ECCFPD.</p> <p>i. Perimeter fuel modification zones around building pads shall be implemented and approved by the ECCFPD prior to combustible materials being brought to the project site areas adjacent to conservation areas that include flammable vegetation.</p> <p>j. Existing flammable vegetation shall be removed on vacant lots prior to commencement of construction and prior to bringing combustible construction materials on-site.</p> <p>k. Dead fuel, ladder fuel (fuel which can spread fire from ground to trees), and downed fuel shall be removed and trees/shrubs shall be properly limbed, pruned, and spaced per this plan.</p>			
		<p><b>MM PSR-2:</b> The applicant shall continuously comply with the Fire Safety Plan during construction of the proposed project.</p> <p>The applicant shall continuously comply with the Fire Safety Plan and conduct the following tasks during the construction of the project: When a Red Flag Warning is issued by the National Weather Service for the project site, all non-emergency construction activities shall cease. This provision shall be clearly stated in the required Fire Safety Plan. The required Emergency Response Liaison shall ensure implementation of a system that allows for immediate receipt of Red Flag Warning information from the San Francisco/Monterey office of the National Weather Service.</p>	<p>East Contra Costa Fire Protection District, Contra Costa County Fire Protection District, and Community Development Director</p>	<p>During construction of the proposed project</p>	

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PSR-1d	Impact related to increased wildfire risk from additional open space.	<p><b>MM PSR-3:</b> Prior to issuance of the first building permit, the applicant shall implement a Fire Protection Plan. The applicant shall submit the Fire Protection Plan, along with maps of the project site and access roads/driveways, to the ECCFPD for review and approval prior to the issuance of any building permit or grading permits. The Fire Protection Plan requires the applicant to enforce the following:</p> <p>a. Residents, employees, and employers shall implement passive protections (fuel modification, interior sprinklers, ignition resistant construction) designed to work with little human intervention.</p> <p>b. All future landowners will be provided with the prohibited plant list and vegetation management zone requirements and limitations. The project applicant shall maintain a community website that includes the prohibited plant list and vegetation management zone requirements and limitations. The project proponent shall also ensure that the prohibited plant list and provisions of the Fire Management Plan shall be enforced by recording applicable covenants, codes, and restrictions on each private lot. This will include guidance for residents, employees, and employers within the project site, on maintaining landscape and structural components according to the appropriate fire standards.</p>	East Contra Costa Fire Protection District and Community Development Director	Prior to issuance of the first building permit	

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		c. Fire rules shall be posted on a business bulletin board for all businesses within the project site. These rules shall be posted in areas visible to employees, typically a break room or main office.			
		<p><b>MM PSR-4:</b> Prior to the issuance of a certificate of occupancy for any residential unit, all prospective landowners, or tenants as appropriate, within the project site shall be provided copies of the prohibited plants list and vegetation management zone requirements and limitations as set forth in the Fire Protection Plan.</p> <p>Provisions in the prohibited plants list and vegetation management zone requirements shall be enforced by recording applicable covenants, codes, and restrictions on each project site as to the applicable plant use prohibitions and vegetation zone management requirements.</p> <p><b>MM PSR-5:</b> Prior to issuance of the grading permit, the applicant shall prepare a Long-Term Open Space Maintenance Implementation Plan to address the approximate 142 acres of repurposed golf course holes and associated landscaping.</p> <p>The Long-Term Open Space Maintenance Implementation Plan shall be provided to the City, the East Contra Costa Fire Protection District, the Contra Costa County Fire Protection District, and</p>	<p>Community Development Director</p> <p>Community Development Director, East Contra Costa Fire Protection District, Contra Costa County Fire Protection District, and the Brentwood Police Department</p> <p>Community Development Director, East Contra Costa Fire Protection District,</p>	<p>Prior to the issuance of a certificate of occupancy for any residential unit</p> <p>Prior to issuance of the grading permit</p>	



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		<p>the Brentwood Police Department for review and approval, with approval by all agencies prior to issuance of the first certificate of occupancy for the project. Upon approval, the applicant shall continuously implement the Long-Term Open Space Maintenance Implementation Plan for the duration of the project’s operations. The maintenance plan shall include, but is not limited to, the following elements:</p> <ul style="list-style-type: none"> <li>▪ Turf Care - Mowing, aerating, reseeding, top dressing, weed control.</li> <li>▪ Irrigation - Adjustment and repair of automated watering of turf, trees, and shrubs.</li> <li>▪ Disease and Insect Control - Monitoring, preventing, correcting, and management of disease and/or insects in turf, trees, shrubs either by natural or chemical methods.</li> <li>▪ Hardscape Surfaces - Sweeping, blowing, and/or power washing of walkways, parking lots, and any other hardscape surfaces within or adjacent to open space areas.</li> <li>▪ Repair - Maintenance required to facilities or open space amenities.</li> <li>▪ Litter Removal - Emptying trash cans, replacing trash bags and picking up litter</li> </ul>	Contra Costa County Fire Protection District, and the Brentwood Police Department		

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		throughout the open space areas.  Special Features - Maintenance of equipment or facilities such as benches, gathering areas, exercise stations, bocce courts, view overlooks, and multi-use lawn areas.			
PSR-2	Impacts related to the increase of the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.	Refer to MM PSR-5.	Refer to Impact PSR-1d.	Refer to Impact PSR-1d.	
PSR-4	Cumulative Impacts related to public services.	Refer to MMs PSR-1, PSR-2, PSR-3, PSR-4, PSR-5.	Refer to Impact PSR-1a and PSR-1d.	Refer to Impact PSR-1a and PSR-1d.	
Transportation & Circulation					
TR-1a	Impacts related to increased delays at West Country Club Drive/American Avenue at Balfour Road.	<b>MM TR-1a:</b> Prior to issuance of the first building permit, the applicant shall design and construct a third westbound left turn lane at the intersection of American Avenue/Balfour Road.	Director of Public Works/City Engineer	Prior to issuance of the first building permit	
TR-1b	Impacts related to increased delays on Balfour Road from American Avenue/West Country Club Drive to SR 4.	Refer to MM TR-1a.	Refer to Impact TR-1a.	Refer to Impact TR-1a.	
TR-1c	Impacts related to increased	<b>MM TR-1c:</b> Prior to issuance of the building permit for the second building at the Deer Ridge site	Director of Public	Prior to issuance of the first	

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	delays at John Muir Parkway at Eagle Rock Way.	(approximately 68 units), the applicant shall be responsible for the construction of an additional eastbound right-turn lane at the intersection of John Muir Parkway/Eagle Rock Way.	Works/City Engineer	building permit for the second building at the Deer Ridge site	
TR-1d	Impacts related to increased delays along SR 4 between Sand Creek Road and Balfour Road.	<p><b>MM TR-1d:</b> Prior to issuance of the first building permit, the project applicant shall pay all required traffic impact fees.</p> <p>Prior to issuance of the first building permit, the applicant shall pay the required fair share traffic impact fees to the East Contra Costa Regional Fee and Financing Authority Fee Program.</p> <p>Widening SR 4 between Balfour Road and San Creek Road is included in the Fee Program. The roadway will operate at acceptable LOS when widened. The widening is currently under construction and when implemented the impact will be insignificant</p>	Director of Public Works/City Engineer	Prior to issuance of the first building permit	
TR-1e	Impacts related to increased delays at SR 4 between Balfour Road and Marsh Creek Road.	Refer to MM TR-1d.	Refer to Impact TR-1d.		
TR-1f	Impacts related to increased intersection delays at John Muir Parkway and Eagle Rock Way.	Refer to MM TR-1c.	Refer to Impact TR-1c.	Refer to Impact TR-1c.	
TR-2b	Impacts related to increased travel time along Balfour Road between American Avenue/	Refer to MM TR-1a.	Refer to Impact TR-1a.	Refer to Impact TR-1a.	

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	West Country Club Drive and SR 4.				
TR-3	Impacts related to applicable congestion management program, including LOS standards, travel demand measures, or other standards established by the county congestion management agency for designated roads or highways.	Refer to MM TR-1a.	Refer to Impact TR-1a.	Refer to Impact TR-1a.	
Utilities					
UTIL-2	Impacts related to the construction of new water or wastewater treatment facilities or expansion of existing facilities.	<p><b>MM UTIL-1:</b> Prior to the issuance of any building permit for each respective site, the applicant shall install a sewer main for the Shadow Lakes site and a sanitary sewer main for the Deer Ridge site.</p> <p>Prior to the issuance of any building permit for the Shadow Lake Site, the applicant shall install an 8-inch diameter sewer main to directly connect the Shadow Lakes Site to the existing 12-inch diameter sewer main in Balfour Road. In addition, prior to the issuance of any building permit for the Deer Ridge Site, the applicant shall install an 8-inch diameter parallel sewer main in Foothill Drive to Douglas Drive.</p>	Director of Public Works/City Engineer	Prior to the issuance of any building permit for each respective site	
		<p><b>MM UTIL-2:</b> Prior to the issuance of grading or any construction permits, the applicant shall prepare and submit for review and approval by the City of Brentwood Public Works Department a final utility</p>	Director of Public Works/City Engineer	Prior to the issuance of grading or any construction	

Mitigation Monitoring Reporting Plan					
Impact Number	Environmental Impacts	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
		<p>plan and supporting calculations.</p> <p>Prior to the issuance of any grading or any construction permits for either the Shadow Lakes or Deer Ridge sites, the applicant shall prepare and submit for review and approval by the City of Brentwood Public Works Department a final utility plan and supporting calculations. The utility plan and calculations shall demonstrate that the project’s proposed onsite and offsite infrastructure (sewer, water, drainage, traffic, etc.) has been properly designed to mitigate the project’s impacts in accordance with all applicable standards and requirements.</p>		permits	
		<p><b>MM UTIL-3:</b> Prior to the issuance of the building permit for the 2nd project building in the Shadow Lakes site or upon the completion of one-third of the units in the Shadow Lakes site, whichever comes first, the applicant shall design and construct an approximate 1,060 foot-long parallel sewer main in Balfour Road to increase sewer capacity from Ranchwood Drive to East Country Drive.</p> <p>Prior to the issuance of any building permit for the 2nd project building or upon the completion of one-third of the units in Shadow Lake site, the applicant shall design and construct a parallel 12-inch diameter sewer main in Balfour Road to increase sewer capacity from Ranchwood Drive to East Country Club Drive. Applicable portions of this work, if any, will be fee creditable pursuant to the City’s current Development Fee Program.</p>	Director of Public Works/City Engineer	Prior to the issuance of the building permit for the 2nd project building in the Shadow Lakes site or upon the completion of one-third of the units in the Shadow Lakes site	

Mitigation Monitoring Reporting Plan					
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UTIL-4	Adequate water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed.	<p><b>MM UTIL-4:</b> Prior to the issuance of the building permit for the 2nd project building or upon the completion of one-third of the units in Deer Ridge, the developer shall design and construct the small missing link (about 550 ft.) of interconnect pipe from the terminus of Foothill Drive, to the terminus of the City’s design for John Muir Parkway.</p> <p>Of the approximately 550 feet of required 12-inch pipe, approximately 380 feet is located within the existing Foothill Drive public right-of-way, easterly of the intersection with Pearson Drive. Prior to the issuance of the building permit for the 2nd project building or upon the completion of one-third of the units in either the Shadow Lakes or Deer Ridge sites, the applicant shall design and construct this approximately 380-foot portion of new water pipe. In addition, the applicant shall design the remaining approximately 170 feet of water pipe to the terminus of the City’s design for John Muir Parkway, and shall demonstrate a good faith effort to acquire the necessary right-of-way to effectuate construction of the remaining 170 feet of pipe.</p> <p>Should the applicant be unable to acquire the needed right-of-way, the applicant shall request the City to acquire the right-of-way on the applicant’s behalf. Applicable portions of this work, if any, will be fee creditable per the City’s current Development Fee Program.</p>	Director of Public Works/City Engineer	Prior to the issuance of the building permit for the 2nd project building or upon the completion of one-third of the units in Deer Ridge	

Mitigation Monitoring Reporting Plan					
Impact Number	Environmental Impacts	Mitigation Measure	Monitoring Agency	Implementation Schedule	Sign-off
UTIL-5	Adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments.	<p><b>MM UTIL-5:</b> Prior to the issuance of the building permit, the applicant shall pay all Development Impact fees to the City.</p> <p>The applicant shall pay the City any and all appropriate Wastewater Impact fees, as calculated by the City. Payment of these fees shall be considered complete mitigation towards the City’s expansion of the Waste Water Treatment Plant’s existing capacity.</p>	Director of Public Works/City Engineer	Prior to the issuance of the building permit	
UTIL-6	Adequate landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs.	<p><b>MM UTIL-6:</b> Prior to the issuance of a grading permit, the applicant shall pay its fair share (17 percent) towards the purchase of one (1) additional front load truck and implement a solid waste reduction program.</p> <p>Prior to the issuance of a grading permit, the applicant shall, in coordination with the Department of Public Works, pay its fair share towards the purchase of one additional front load truck. The fair share shall be based on the ratio of 2 cubic yards per unit per month. Since the proposed project would result in approximately 560 new units, the project’s fair share would be 17 percent for a front load truck’s route utilized by the proposed project.</p> <p>Prior to the issuance of a grading permit, the applicant shall prepare and implement a solid waste reduction program for both construction and operation of the proposed project. This plan shall be prepared in coordination with the Department of Public works and shall include</p>	Director of Public Works/City Engineer	Prior to the issuance of a grading permit	

<b>Mitigation Monitoring Reporting Plan</b>					
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		measures for minimizing the amount of construction-related materials that require transport to landfills. The plan shall also include solid waste reduction measures and recycling opportunities for future residents.			
UTIL-8	Cumulative Impacts related to utilities and service systems.	Refer to MM-UTIL 1 through MM UTIL-6.	Refer to Impacts UTIL-2, UTIL-4, UTIL-5, UTIL-6.	Refer to Impacts UTIL-2, UTIL-4, UTIL-5, UTIL-6.	