



Seneca Healthcare District Facility Replacement Project MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) was formulated based on the findings of the Initial Study prepared for the Seneca Healthcare District Facility Replacement Project. The purpose of the MMRP is to ensure the implementation of mitigation measures identified as part of the environmental review for the project.

The MMRP (Table 1) lists mitigation measures recommended in the Initial Study and identifies mitigation monitoring requirements. The column entitled "Mitigation Responsibility" identifies the party responsible for carrying out the required actions. The columns entitled "Monitoring/Reporting Agency" and "Monitoring Schedule" identify the party ultimately responsible for ensuring that the mitigation measure is implemented and the approximate timeframe for the oversight agency to ensure implementation of the mitigation measure. The column entitled "Verification of Compliance" will be used by the Seneca Healthcare District to document the person who verified the implementation of the mitigation measure and the date on which this verification occurred.

The Seneca Healthcare District must adopt a MMRP or an equally effective program, if it approves the proposed project with the mitigation measures included in the Initial Study. Public Resources Code, Section 21081.6(a) requires an agency to adopt a program for reporting or monitoring mitigation measures that were adopted or made conditions of project approval.

Table 1: Mitigation Monitoring and Reporting Program

Mitigation Measures	Monitoring Measures	ImplementedBy	When Implemented	Monitored By	Verified By andDate
A. AESTHETICS					
There are no significant Aesthetic impacts, therefore no mitigation measures are required.					
B. AGRICULTURE AND FOREST RESOURCES					
There are no significant Agriculture and Forest Resources impacts, therefore no mitigation measures are required.					
C. AIR QUALITY					
Mitigation Measure AQ-1: Dust control during construction	Monitoring Measure AQ-1: Seneca Healthcare District (SHD) shall prepare a dust control plan pursuant to NSAQMD Rule 226 (Dust Control) and submit the dust control plan to NSAQMD for review and approval.	Monley-Hamlin/Descor (MH-D) [General Contractor] - During construction dust control via water truck - During construction speed limit SHD - Submittal of Dust Control Plan to NSAQMD	MH-D: Ongoing SHD: - Submitted: 7/14/23 - Approved: 7/24/23 and reconfirmed 6/21/2024	NSAQMD	Melissa Klundby, NSAWMD on 7/24/23 and 6/21/24
Mitigation Measure AQ-2: Vegetation Disposal during Site Cleaning	Monitoring Measure AQ-2: Due to Project's proximity to sensitive receptors (the existing medical facility, senior care facility, and private residences), vegetation will not be piled and burned on-site. Slash from harvested trees, non-commercial trees, and shrubs shall be chipped and left in place or disposed of off-site.	NA – No burning of vegetation has occurred. Per approved Timberland Conversion Permit slash and woody vegetation were hauled offsite.	NA	NA	
Mitigation Measure AQ-3: Exhausts Generated during Facility Operations	Monitoring Measure AQ-3: If any source of air contaminants (such as a diesel generator or an ethylene oxide sterilizer) is proposed as part of the Project, the applicant shall contact NSAQMD to determine if an Authority to Construct / Permit to Operate is required.	NA to date. SHD to submit to NSAQMD for backup diesel generators when design is complete. Fleet certification includes certificate that diesel equipment used during Construction complies with CARB regulations.	NA to date for permanent facilities Fleet certification submitted 5/23/2024	NA to date for permanent facilities SHD and MH-D for fleet vehicles.	NA to date for permanent facilities Fleet certification by SHD 5/23/2024
D. BIOLOGICAL RESOURCES					
Mitigation Measure BIO-1: Floristic Surveys	Monitoring Measure BIO-1: Appropriately timed surveys for special-status plants shall be conducted in compliance with all CDFW (2018), USFWS (1996), and California Native Plant Society (CNPS, 2001) published survey guidelines prior to initiation of work activities. Project commencement shall not be initiated until special-status plant pre-construction surveys are completed and subsequent mitigation, if necessary, is implemented. If no special-status plant species are found to inhabit the site, no further mitigation measures would be necessary. If special-status plant species are detected, individuals shall be clearly marked and avoided. If special-status plants detected during focused surveys cannot be avoided, consultation with CDFW and/or USFWS (depending on listing status) shall occur. As part of this consultation, a mitigation plan shall be developed and approved by the appropriate agencies to avoid all adverse impacts. The mitigation plan will include methodology of transplanting and/or on-site replanting at a 1:1 (mitigation to impacts) ratio, a 5-year monitoring program, success criteria (e.g., 70 percent survivorship threshold), and annual reporting requirements. In addition, this plan shall include worker education and development of appropriate avoidance and minimization measures.	SHD qualified biologist ENPLAN - No special status plant species observed onsite during surveys - ENPLAN opinion that no additional surveys for special status plants are warranted at time of report [this is still ENPLAN current opinion].	ENPLAN 7/24/2023	ENPLAN	Donald Burk, ENPLAN qualified biologist 7/24/2023

Mitigation Measures	Monitoring Measures	ImplementedBy	When Implemented	Monitored By	Verified By andDate
Mitigation Measure BIO-2a: Environmental Training	Monitoring Measure BIO-2a: Each year prior to the commencement of Project-related activities, a qualified biologist will provide an environmental awareness training program to educate Project personnel on relevant special-status species and their habitats, sensitive/regulated habitats, and applicable environmental laws and permits. The training shall include a description of the species and their habitats, importance of preserving species and habitats, penalties for unauthorized take, and the Project limits.	ENPLAN - Initial onsite training provided for SHD staff, MH-D, and design professionals. - Video training provided for future use by MH-D as new construction workers come onsite. MH-D - MH-D staff - Two sub-contractors onsite to date - Bullert Electric - R&R Horn	Initial training (recorded): 7/31/23 2024 training (recorded): 8/15/24 Bullert signoff: 10/15/2024 R&R signoff: 09/23/2024 MH-D training via the recorded video done by ENPLAN, tracking training via sign-in sheet	MH-D	Aran Cheema (MH-D) 6/23/25
Mitigation Measure BIO-2b: Migratory Birds and Raptors / Nest Avoidance	Monitoring Measure BIO-2b: Tree and vegetation clearing (removal, pruning, trimming, and mowing) shall be scheduled to occur outside of the migratory bird nesting season (February 1 through August 31). If clearing and/or construction activities will occur during the migratory bird nesting season, pre-construction surveys to identify active migratory bird and/or raptor nests shall be conducted by a qualified biologist within 14 days of construction initiation on the Project site and within 300 feet (i.e., zone of influence) of Project-related activities. The zone of influence includes areas outside of the Project site where birds could be disturbed by construction-related noise or earth-moving vibrations. If active nest or roost sites are identified within the Project site, no-disturbance buffers shall be established for all active nest sites prior to commencement of any proposed Project-related activities to avoid construction or access-related disturbances of migratory bird nesting activities. A no-disturbance buffer constitutes a zone in which proposed Project-related activities (e.g., vegetation removal, earth moving, and construction) cannot occur. A minimum buffer size of 50 feet for passerines and 300 feet for raptors will be implemented; sizes of the buffers shall be determined by a qualified biologist based on the species, activities proposed near the nest, and topographic and other visual barriers. Buffers shall remain in place until the young have departed the area or fledged and/or the nest is inactive, as determined by the qualified biologist. If work is required within a buffer zone of an active bird nest, work may occur under the supervision of a qualified avian biologist. The qualified avian biologist monitoring the construction work will have the authority to stop work and adjust buffers if any disturbance to nesting activity is observed.	ENPLAN - Pre-Construction Nesting bird survey #1: 10/4/2023 - No nesting raptors on raptor nests observed - Blue Haron nestlings had matured and left nest - Pre-Construction Nesting bird survey #2: 08/15/2024 - No nesting activities observed - Additional surveys if construction activities delayed more than 14 days. - Pre-Construction Nesting survey #3: 4/11/25 with follow up 4/15/25 - Fencing and 35’buffer implemented at Stellar Jay nest	10/4/2023 and 08/15/2024 4/11/25 & 4/15/25	ENPLAN MH-D	Donald Burk, ENPLAN qualified biologist 10/04/2023. Jacob Ewald ENPLAN qualified biologist 08/15/2024. Jacob Ewald (ENPLAN) 4/21/25 via confirmation with CDFW Aran Cheema (MH-D) 6/23/25
Mitigation Measure BIO-2c: Mig Bald Eagle and Golden Eagle	Monitoring Measure BIO-2c: In accordance with the Bald and Golden Eagle Protection Act (BGEPA) (USFWS, last amended 1978), pre-construction surveys for eagles shall be conducted on the Project site and within 0.5 miles of Project site boundaries. If an active eagle nest is detected within this survey area, the Project proponent shall implement a 0.5-mile no-disturbance buffer around the nest until a qualified	See BIO-2b bird surveys. No eagles noted	See BIO-2b.	See BIO-2b	See BIO-2b

Mitigation Measures	Monitoring Measures	ImplementedBy	When Implemented	Monitored By	Verified By andDate
	biologist determines the nest is no longer active.				
Mitigation Measure BIO-3: Riparian Habitat and Waters of the United States/State <i>CEQA BIO-3 is the same as NEPA wetlands measure (WET-1) Conservation and Open Space (COS) 7.2.1 – Habitat Protection</i>	Monitoring Measure BIO-3: Prior to Project implementation, any waters of the United States, potential waters of the United States, and associated riparian zones shall be established as ESAs and marked off with fencing as directed by a qualified biologist. Monitoring by a qualified biologist should occur for any required work near the ESAs. The proposed Project would not interfere substantially with the movement of any 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. The Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	Flagging present to mark off waters to be protected.	July 2023 to present	ENPLAN MH-D Forester SHD	Donald Burk, ENPLAN qualified biologist 07/31/2023.
NEPA Mitigation Measure BIO-3: Invasive Species	NEPA Monitoring Measure BIO-3: Vehicles and construction equipment should be inspected prior to entering the project site, and any soil and plant material shall be washed off equipment or vehicle tires and treads prior to entering the site and before leaving site. Any seed and mulch landscaping used during the course of construction shall comply with state regulations.	Development of plan for compliance with input from ENPLAN, provided to MH-D in 4/7/25 email. SHD is also checking oncoming trucks and logging observations.	Start of construction	MH-D	Aran Cheema (MH-D) 6/23/25
E. CULTURAL RESOURCES					
Mitigation Measure CULT-1: Inadvertent Discover of Human Remains	Monitoring Measure CULT-1: If any human remains are encountered during any phase of construction, all earth-disturbing work shall stop within 50 feet of the find. The County coroner shall be contacted to determine whether investigation of the cause of death is required as well as to determine whether the remains may be Native American in origin. Should Native American remains be discovered, the county coroner must contact the Native American Heritage Commission (NAHC). The NAHC will then determine those persons it believes to be most likely descended from the deceased Native American(s). Together with representatives of the people of most likely descent, a qualified archaeologist can assess the discovery and recommend/implement mitigation measures as necessary.	NA – no findings to date	NA	NA	
Mitigation Measure CULT-2: Inadvertent Discover of Cultural Resources	Monitoring Measure CULT-2: If any previously unevaluated tribal cultural resources (i.e., burnt animal bone, midden soils, projectile points or other human-modified lithics, historic artifacts, etc.) are encountered, all earth-disturbing work shall stop within 50 feet of the find until a qualified archaeologist can assess the discovery and recommend/implement mitigation measures as necessary. Depending on the type and significance of the find, subsequent monitoring by an archaeologist or Native American may be warranted. This stipulation does not apply to those	NA – no findings to date	NA	NA	

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	cultural resources evaluated and determined not Historical Resources/Historic Properties in the Cultural Resources Technical Report prepared for the Project.				
F. GEOLOGY AND SOILS					
There are no significant Geology and Soils impacts, therefore no mitigation measures are required.					
G. GREENHOUSE GAS EMISSIONS					
There are no significant Greenhouse Gas Emissions impacts, therefore no mitigation measures are required.					
H. HAZARDS AND HAZARDOUS MATERIALS					
Mitigation Measure HAZ-1: Fire Prevention Plan	Monitoring Measure HAZ-1: To reduce the risk of fire onsite, prior to construction SHD shall prepare a Fire Prevention Plan that includes the following provisions: a) SHD shall use fire resistant vegetation in onsite landscaping. b) Maintenance of the site shall include establishment of defensible space of structures onsite and the inspection of fire suppression equipment such as sprinklers. c) SHD shall coordinate with CPUD to determine the appropriate amount of water and fire suppression equipment to be kept onsite for fire prevention purposes during project construction and operation. d) SHD and/or its contractors shall have water tanks, water trucks, or portable water backpacks (where space or access for a water truck or water tank is limited) sited/available at the project site for fire protection. e) During construction of the project SHD and/or its contractors shall implement ongoing fire patrols during construction hours and for 1 hour after the end of daily construction and hot work. f) All construction crews and inspectors shall be provided with radio and cellular telephone access that is operational along the entire length of the approved route to allow communications with other vehicles and construction crews. All fires shall be reported immediately upon detection. g) All internal combustion engines, stationary and mobile, shall be equipped with spark arresters in good working order. h) Light trucks and cars with factory-installed mufflers shall be used only on roads where the roadway is cleared of vegetation. i) Equipment parking areas and small stationary engine sites shall be cleared of all extraneous flammable material. j) SHD shall prohibit smoking in wildland areas, with smoking limited to paved areas or areas cleared of all vegetation. k) All construction vehicles shall carry fire suppression equipment. l) SHD shall ensure that all construction workers receive training on the proper use of fire-fighting equipment and procedures to be followed in the event of a fire. m) As construction may occur simultaneously at several locations, each construction site shall be equipped with fire extinguishers and fire-fighting equipment sufficient to extinguish small fires.	MH-D Fire Prevention plan is still in development pending feedback on requirements from Peninsula Fire Department. MH-D safety program addresses fire prevention components for Contractor. Fire Prevention plan was developed through coordination of Owner/Owner's rep, MH-D & Peninsula Fire Department. That document was provided to MH-D on 4/7/25	Ongoing	MH-D Peninsula Fire Department	Robert Gray (Peninsula Fire) 4/3/25 via meeting Aran Cheema (MH-D) 6/23/25

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	n) SHD shall instruct construction personnel to park vehicles within roads, road shoulders, graveled areas, and/or cleared areas (i.e., away from dry vegetation) wherever such surfaces are present at the construction site. o) SHD and its contractor shall cease work during Red Flag Warning events in areas where vegetation would be susceptible to accidental ignition by project activities such as welding or use of equipment that could create a spark. p) SHD shall coordinate the finalization of road improvements with CPUD and other emergency responders to ensure that sufficient ingress and egress exists onsite. A copy of the Fire Prevention Plan shall be posted at all construction sites and all employees and contractors should be encouraged to sign a statement indicating that they have read and understand the Fire Prevention Plan.				
I. HYDROLOGY AND WATER QUALITY					
Mitigation Measure WQ-1: Drainage Plan	Monitoring Measure WQ-1: Prior to issuance of a grading permit, the project engineer or other qualified professional shall prepare a drainage study that demonstrates, via engineering calculations, that the design of the proposed onsite detention basins will provide sufficient detention capacity to ensure that the rate and volume of storm discharge from the site during the 10-, 25-, and 100-year, 24-hour storm events does not exceed existing, pre-project conditions. The drainage study shall be made available to the California Department of Transportation (Caltrans) District 2, and concurrence of the conclusions of the drainage study shall be obtained from Caltrans by the Seneca Healthcare District prior to issuance of a grading permit.	Ross Simmons, PE NorthStar	April 11, 2023	CalTrans	Kathy Grah (reference email 5/23/23)
J. LAND USE AND PLANNING					
There are no significant Land Use and Planning impacts, therefore no mitigation measures are required.					
K. MINERAL RESOURCES					
There are no significant Mineral Resources impacts, therefore no mitigation measures are required.					
L. NOISE					
Mitigation Measure NOI-1: Construction-Related Noise	Monitoring Measure NOI-1: The District shall seek to limit the potential noise impacts of construction activities on surrounding land uses. Construction shall occur between the hours of 7 a.m. and 7 p.m., Monday through Friday and 8 a.m. and 5 p.m. on weekends or on federally recognized holidays. Exceptions shall be allowed if it can be demonstrated that construction outside of these time periods is necessary to alleviate traffic congestion and safety hazards.	Project specifications require work within noted hours. SHD regularly communicates with nearby neighbors and MH-D to reduce noise impacts.	Ongoing	MH-D SHD	Aran Cheema (MH-D) 6/23/25
Mitigation Measure NOI-2: Helicopter-Related Noise	Monitoring Measure NOI-2: The District shall reduce noise produced by periodic helicopter ambulance incoming flights and outgoing flights by implementing the following measures. -Preferentially contract with air ambulance services that use the Eurocopter EC130.	NA - no helicopter use to date	NA	NA	

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	-Where feasible, retain trees within 50-100 feet of neighboring residential properties to soften the acoustic environment -Incorporate acoustic barriers in the walls of the hospital facilities facing the heliport or construct a sound-attenuation barrier next to the hospital, facing the heliport. -Plant sound-attenuating landscaping between the helipad and sensitive receptors to soften the acoustic environment. -Provide guidance and training to helicopter pilots in flight procedures to reduce noise impacts during ingress and egress.				
M. POPULATION AND HOUSING					
There are no significant Public Services impacts, therefore no mitigation measures are required.					
N. PUBLIC SERVICES					
There are no significant Public Services impacts, therefore no mitigation measures are required.					
O. RECREATION					
There are no significant Recreation impacts, therefore no mitigation measures are required.					
P. TRANSPORTATION/TRAFFIC					
There are no significant Transportation/Traffic impacts, therefore no mitigation measures are required.					
Q. UTILITIES AND SERVICE SYSTEMS					
There are no significant Utilities and Service System impacts, therefore no mitigation measures are required.					