

**CITY OF COACHELLA
BEJARANO CANNABIS CULTIVATION PROJECT
MITIGATION MONITORING AND REPORTING PROGRAM**

Mitigation Measure	Implementation Schedule		Verification
<p>Air Quality</p> <p>AIR-1 <u>Fugitive Dust Control</u>. The following measures shall be incorporated into Project plans and specifications for implementation:</p> <ul style="list-style-type: none"> • Apply soil stabilizers or moisten inactive areas. • Water exposed surfaces as needed to avoid visible dust leaving the construction site (typically 2-3 times/day). • Cover all stock piles with tarps at the end of each day or as needed. • Provide water spray during loading and unloading of earthen materials. • Minimize in-out traffic from construction zone. • Cover all trucks hauling dirt, sand, or loose material and require all trucks to maintain at least two feet of freeboard. • Sweep streets daily if visible soil material is carried out from the construction site. 	<p>This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction.</p>		<p>A copy of the construction contract including this air mitigation measures shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the air quality measures have been implemented as required in these measures. Field notes documenting verification shall be retained in the project file.</p>
	Source	Responsible Party	Status / Date / Initials
	Initial Study	City of Coachella Development Services	

Mitigation Measure	Implementation Schedule		Verification
<p>Air Quality</p> <p>AIR-2 <u>Exhaust Emissions Control</u>. The following measures shall be incorporated into Project plans and specifications for implementation:</p> <ul style="list-style-type: none"> • Utilize well-tuned off-road construction equipment. • Establish a preference for contractors using Tier 3 or better heavy equipment. • Enforce 5-minute idling limits for both on-road trucks and off-road equipment. 	<p>This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction.</p>		<p>A copy of the construction contract including this air mitigation measures shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the air quality measures have been implemented as required in these measures. Field notes documenting verification shall be retained in the project file.</p>
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<p>Biological Resources</p> <p>BIO-1 The State of California prohibits the “take” of active bird nests. To avoid an illegal take of active bird nests, any grubbing, brushing or tree removal should be conducted outside of the the State identified nesting season (Raptor nesting season is February 15 through July 31; and migratory bird nesting season is March 15 through September 1). Alternatively, the site shall be evaluated by a qualified biologist prior to the initiation of ground disturbance to determine the presence or absence of nesting birds. Active bird nests MUST be avoided during the nesting season. If an active nest is located in the Project construction area it will be flagged and a 300-foot avoidance buffer placed around it. No activity shall occur within the 300-foot buffer until the young have fledged the nest.</p> <p>Nesting bird surveys shall be conducted by a qualified avian biologist no more than three (3) days prior to vegetation clearing or ground disturbance activities. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the preconstruction nesting bird surveys, a Nesting Bird Plan (NBP) shall be prepared and implemented by the qualified avian biologist. At a minimum, the NBP shall include guidelines for addressing active nests, establishing buffers, ongoing monitoring, establishment of avoidance and minimization measures, and reporting. The size and location of all buffer zones, if required, shall be based on the nesting species, individual/pair’s behavior, nesting stage, nest location, its sensitivity to disturbance, and intensity and duration of the disturbance activity. To avoid impacts to nesting birds, any grubbing or vegetation removal should occur outside peak breeding season (typically February 1 through September 1).</p>	<p>Construction shall occur outside of the nesting season or a copy of the field survey documenting no nesting birds shall be completed prior to initiating construction within the nesting season.</p>		<p>City personnel shall document the dates of construction. If construction is proposed to occur within the nesting season, a copy of the field survey documenting the absence of nesting birds shall be retained in the project file.</p>
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<p>Biological Resources</p> <p>BIO-2 <u>Prior to construction and issuance of any grading permit, the City of Coachella shall develop a plan with measures to avoid, minimize, or mitigate the impacts of pesticides used in cannabis cultivation, including fungicides, herbicides, insecticides, and rodenticides. The plan should include, but is not limited to, the following elements: (1) Proper use, storage, and disposal of pesticides, in accordance with manufacturers' directions and warnings. (2) Avoidance of pesticide use where toxic runoff may pass into waters of the State, including ephemeral streams. (3) Avoidance of pesticides that cannot legally be used on cannabis in the state of California, as set forth by the Department of Pesticide Regulation. (4) Avoidance of anticoagulant rodenticides and rodenticides with "flavorizers." (5) Avoidance of sticky/glue traps. (6) Inclusion of alternatives to toxic rodenticides, such as sanitation (removing food sources like pet food, cleaning up refuse, and securing garbage in sealed containers) and physical barriers.</u></p>	<p>This measure shall be implemented prior to initiation of construction. The Plan shall be included as part of the construction contract, and shall be included as a requirement of occupancy during both the interim and permanent operational phases.</p>	<p>A copy of the plan shall be documented and retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the pesticide management plan is being implemented by the contractor and Applicant as required in this measure.</p>	
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<p>Biological Resources</p> <p>BIO-3 <u>Light should not be visible outside of any structure used for cannabis cultivation. Employ blackout curtains where artificial light is used to prevent light escapement. Eliminate all nonessential lighting from cannabis sites and avoid or limit the use of artificial light during the hours of dawn and dusk when many wildlife species are most active. Ensure that lighting for cultivation activities and security purposes is shielded, cast downward, and does not spill over onto other properties or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). Use LED lighting with a correlated color temperature of 3,000 Kelvins or less, properly dispose of hazardous waste, and recycle lighting that contains toxic compounds with a qualified recycler.</u></p>	<p>This measure shall be implemented by the contractor and included as part of the construction contract, and shall be implemented by the Applicant as a condition by the City during the operational phases.</p>	<p>A copy of the lighting design shall be retained in the project file, and City field inspectors shall verify that the design is being implementing without adverse impact on adjacent light sensitive uses. Field notes from inspections shall be retained in the project file.</p>	
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<p>Biological Resources</p> <p>BIO-4 <u>Prior to construction and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.</u></p>	<p>The Applicant shall obtain written correspondence from CDFW stating that a Streambed Alteration Agreement from the CDFW is not required, or where required, obtain the permit from CDFW. This shall be obtained prior to ground disturbance within the jurisdictional area and the conditions of the permits shall be implemented as defined by the permit, if required.</p>	<p>A copy of the written correspondence or, if applicable, the permit from CDFW shall be retained in the project file, and verification that all conditions have been implemented shall be retained in the project file.</p>				
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Mitigation Measure	Implementation Schedule	Verification				
<p>Cultural Resources</p> <p>CUL-1 Should any cultural resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection shall be performed immediately by a qualified archaeologist. Responsibility for making this determination shall be with the City's onsite inspector. The archaeological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.</p>	<p>Any response to exposed resources shall occur during construction. Any reports documenting management and findings for accidentally exposed resources shall be completed within one year of the discovery.</p>	<p>A copy of the Program shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the archaeological monitoring program is being implemented by the contractor as required in this measure. Field notes documenting verification shall be retained in the project file.</p>				
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<p>Geology and Soils</p> <p>GEO-1 Prior to initiating grading, the site developer shall provide a geotechnical evaluation of the potential liquefaction hazards at the site and, if a hazard exists at the proposed project location, the evaluation shall define design measures that will ensure the safety of any new structures in protecting human life in the event of a regional earthquake affecting the site. The developer shall implement any design measures required to protect human safety.</p>	<p>This measure shall be completed prior to construction of any structures on site. Measures required by the geotechnical report shall be included in the construction contract as a contract specification and implemented by the contractor during construction.</p>	<p>A copy of the construction contract including this geology/soils mitigation measure shall be retained in the project file, as shall a copy of the geotechnical report. Verification of implementation shall be based on field inspections by City inspection personnel that verify the geology/soils measures have been implemented as required in these measures. Field notes documenting verification shall be retained in the project file.</p>				
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<p>Geology and Soils</p> <p>GEO-2 Stored backfill material shall be covered with water resistant material during periods of heavy precipitation to reduce the potential for rainfall erosion of stored backfill material. If covering is not feasible, then measures such as the use of straw bales or sand bags shall be used to capture and hold eroded material on the project site for future cleanup.</p>	<p>This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction.</p>	<p>A copy of the construction contract including this erosion control mitigation measure shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the erosion control measures have been implemented as required in this measure. Field notes documenting verification shall be retained in the project file.</p>				
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<p>Geology and Soils</p> <p>GEO-3 All exposed, disturbed soil (trenches, stored backfill, etc.) shall be sprayed with water or soil binders twice a day, or more frequently if fugitive dust is observed migrating from the site within which the Bejarano Cannabis Cultivation Facility is being constructed.</p>	<p>This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction.</p>	<p>A copy of the construction contract including this erosion control mitigation measure shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the erosion control measures have been implemented as required in this measure. Field notes documenting verification shall be retained in the project file.</p>				
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<p>Geology and Soils</p> <p>GEO-4 Should any paleontological resources be encountered during construction of these facilities, earthmoving or grading activities in the immediate area of the finds shall be halted and an onsite inspection should be performed immediately by a qualified paleontologist. Responsibility for making this determination shall be with the City's onsite inspector. The paleontological professional shall assess the find, determine its significance, and make recommendations for appropriate mitigation measures within the guidelines of the California Environmental Quality Act.</p>	<p>Any response to exposed resources shall occur during construction. Any reports documenting management and findings for accidentally exposed resources shall be completed within one year of the discovery.</p>	<p>The City shall be notified within 24-hours of accidental exposure of any paleontological resources. A copy of initial findings shall be provided to the City and retained in the project file. A copy of the final report shall be retained in the project file.</p>				
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<p>Hazards and Hazardous Materials</p> <p>HAZ-1 All spills or leakage of petroleum products during construction activities will be remediated in compliance with applicable state and local regulations regarding cleanup and disposal of the contaminant released. The contaminated waste will be collected and disposed of at an appropriately licensed disposal or treatment facility. This measure will be incorporated into the SWPPP prepared for the Project development.</p>	<p>These measures shall be identified in the project Stormwater Pollution Prevention Plan (SWPPP) and implemented during construction.</p>	<p>A copy of the SWPPP with this measure shall be retained in the project file. Verification of implementation shall be based on field inspections by City inspection personnel that verify the SWPPP BMPs have been implemented as required in this measure. Field notes documenting verification shall be retained in the project file.</p>				
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Mitigation Measure	Implementation Schedule	Verification				
<p>Hazards and Hazardous Materials</p> <p>HAZ-2 All pesticides, <u>hazardous materials</u>, and <u>other toxic substances</u> shall be used and stored in a manner that prevents them from contaminating the underlying groundwater, soils, and watershed. The Applicant shall develop a Hazardous Materials Communication Plan (HMCP) that shall meet State Occupational Safety and Health Administration (OSHA) standards. The HMCP shall include protocols for and shall classify hazardous materials on the project site and communicate information concerning hazards and appropriate protective measures to employees. All employees shall receive training based on the standards contained in the HMCP prior to handling any hazardous materials on site. The HMCP will be available at the facility manager's office. Furthermore, all hazardous materials shall be stored in compliance with State and Federal laws.</p>	<p>This measure shall be implemented during operations of the Project. The HMCP shall be developed prior to commencement of Project operations.</p>	<p>A copy of the HMCP shall be retained in the project file. This Plan shall be retained at the Project site and made available to employees working at the facility. Site inspections shall be performed to ensure adequate equipment has been provided and personnel have been adequately trained in accordance with the HMCP.</p>				
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<p>Hazards and Hazardous Materials</p> <p>HAZ-3 All trash generated by the Applicant, including fertilizer containers, spent growth medium, soil amendments, etc. shall be disposed of in accordance with State and Federal law. The Applicant shall periodically (on a monthly basis) inspect the trash disposal area(s) to verify that all trash generated by Project operations is stored within the appropriate trash bin or container, and shall verify that none of the trash bins or containers leak. The Applicant shall repair any leaking trash bins or containers upon discovery of a leak. Furthermore, the Applicant shall be required to remove solid waste periodically (no less than once a month). Solid waste shall be disposed of or recycled at a licensed handling facility.</p>	<p>This measure shall be implemented during Project operations.</p>	<p>Site inspections shall be performed by the City to verify that the requirements in this measure are being met. The Applicant shall keep records documenting compliance with this measure and this documentation shall be provided to the City. Field notes documenting verification shall be retained in the project file.</p>				
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<p>Hazards and Hazardous Materials</p> <p>HAZ-4 The Applicant shall install a water treatment system to treat irrigation water that will allow water to be used again for irrigation. Such water treatment systems typically create concentrated levels of total dissolved solids (TDS) and brine that must be disposed of according to State and Federal law. As such, the Applicant shall collect the brine generated by the water treatment system and it shall be transported and disposed of by a permitted and licensed hazardous materials service provider.</p>	<p>This measure shall be included in the construction contract as a contract specification and implemented by the contractor during construction. Additionally, this measure shall be implemented during operation.</p>	<p>Records shall be kept documenting all hazardous waste disposal and site inspections by the City shall be performed to ensure adherence to this measure. Field notes documenting verification shall be retained in the project file.</p>				
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<p>Noise</p> <p>NOI-1 All construction vehicles and fixed or mobile equipment shall be equipped with properly operating and maintained mufflers.</p>	<p>This measure shall be implemented during construction and included in the contract with the construction contractor.</p>	<p>City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.</p>				
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<p>Noise NOI-2 All employees that will be exposed to noise levels greater than 75 dB over an 8-hour period shall be provided with adequate hearing protection devices to ensure no hearing damage will result from construction activities.</p>	This measure shall be implemented during construction and included in the contract with the construction contractor.	City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.	
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<p>Noise NOI-3 No exterior construction activities shall occur during the hours of 5:30 PM through 6 AM, Monday through Friday between October 1st and April 30th, and 7 PM and 5 AM Monday through Friday between May 1st and September 30th; all year between the hours of 5 PM and 8 AM on Saturdays, Sundays, and holidays, unless a declared emergency exists.</p>	This measure shall be implemented during construction and included in the contract with the construction contractor.	City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.	
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<p>Noise NOI-4 Equipment not in use for five minutes shall be shut off.</p>	This measure shall be implemented during construction and included in the contract with the construction contractor.	City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.	
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Noise NOI-5 Equipment shall be maintained and operated such that loads are secured from rattling or banging.	This measure shall be implemented during construction and included in the contract with the construction contractor.	City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.	
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Noise NOI-6 Construction employees shall be trained in the proper operation and use of equipment consistent with these mitigation measures, including no unnecessary revving of equipment.	This measure shall be implemented during construction and included in the contract with the construction contractor.	City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.	
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Noise NOI-7 The City will require that all construction equipment be operated with mandated noise control equipment (mufflers or silencers). Enforcement will be accomplished by random field inspections by applicant personnel during construction activities.	This measure shall be implemented during construction and included in the contract with the construction contractor.	City personnel shall verify that construction activities comply with this requirement. The verification shall be retained in the project file.	
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<p><i>Utilities and Service Systems</i></p> <p>UTL-1 If recycled water becomes available at the project site, Bejarano shall connect to this system and utilize recycled water for landscape irrigation, and any other feasible uses of recycled water on the project site.</p>	<p>This measure shall be implemented once the project is in operation, and shall be implemented only if recycled water becomes available at the Project site.</p>	<p>City personnel shall verify that the Applicant connects to recycled water should it become available. Verification shall be based on field inspections during project operation, and field notes documenting implementation shall be retained in the project file.</p>				
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