

## **INTRODUCTION**

The County of Marin, serving as the lead agency, prepared the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) to provide the interested public and responsible and trustee agencies with information about the potential environmental effects of the proposed **Spirit Rock Meditation Center – Master Plan Amendment Project** (Project).

As set forth in the provisions of CEQA and implementing regulations, public agencies are charged with the duty to consider the environmental impacts of proposed development and to minimize these impacts where feasible.

This Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND) has been prepared in accordance with the California Environmental Quality Act (CEQA) and is comprised of the Draft Initial Study/Mitigated Negative Declaration the response to comments, a project errata, and the Mitigation Monitoring and Reporting Program (MMRP). The Draft IS/MND is intended to evaluate the environmental impacts of the proposed project as required by law and to be used to modify, approve, or deny approval of the proposed project based on the analysis in the environmental documents.

The Draft IS/MND was released for public and agency review on September 27, 2010 and the 30-day review and comment period ran through October 26, 2010. According to the State Clearinghouse, no State agency commented on the proposed project.

Three comment letters were received during the public and agency comment period. Edits were made to incorporate requested information and clarify text. Nothing in the content of comments or the responses to comments triggered the need to recirculate the Draft IS/MND, nor is the preparation of an Environmental Impact Report necessary.

According to CEQA Guidelines 15073.5, recirculation of a Draft IS/MND is not required when:

- mitigation measures are replaced with equal or more effective measures pursuant to Section 15074.1,
- new project revisions are added in response to written or verbal comments on the project's effects identified in the proposed negative declaration which are not new avoidable significant effects,
- measures or conditions of project approval are added after circulation of the negative declaration which are not required by CEQA , which do not create new significant environmental effects and are not necessary to mitigate an avoidable significant effect, and
- New information is added to the negative declaration which merely clarifies, amplifies, or makes insignificant modifications to the negative declaration.

The Draft IS/MND contains a copy of the comments, and responses to those comments. The Draft IS/MND also contains an Errata with revisions to the Draft IS/MND that are a result of responses to comments. The Draft IS/MND also contains a Mitigation, Monitoring, and Reporting Program (MMRP). An MMRP is required for the proposed project because the Draft IS/MND identified potentially significant impacts of the proposed project and measures were identified to mitigate those impacts.

## **RESPONSES TO COMMENTS**

## **EXHIBIT A DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION RESPONSE TO COMMENTS**

This section includes a list of commenters, comment letters, and responses to comments on the Draft Initial Study/Mitigated Negative Declaration (IS/MND). The Marin Audubon Society, Marin Municipal Water District (MMWD), and the Office of Planning and Research (OPR) submitted written comments on the Draft Initial Study/Mitigated Negative Declaration.

<b>Letter</b>	<b>Individual or Signatory</b>	<b>Affiliation</b>	<b>Date</b>
A	Ms. Barbara Salzman, Co-chair, Conservation Committee	Marin Audubon Society	October 25, 2010
B	Mr. Dain Anderson, Environmental Services Coordinator	Marin Municipal Water District	October 26, 2010
C	Mr. Scott Morgan, Director of State Clearinghouse	Office of Planning and Research	October 27, 2010

Written comments on the Draft IS/MND are reproduced, along with responses to those comments. Where there are text edits to the Draft IS/MND result from responding to comments, those changes are identified in the response and demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text) for easy reference. These comment-initiated text edits, as well as minor staff initiated changes, are also provided and demarcated with revision marks in the Errata. The text edits are fully incorporated without revision marks into the Mitigation Monitoring and Reporting Program in the Draft IS/MND.

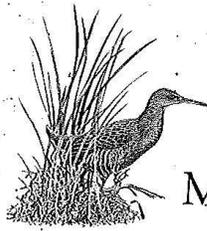
Following the close of the public comment period, the project sponsor submitted e-mail correspondence to the County to clarify project components that were addressed in the submitted letters of comment. In particular, the project sponsor has clarified that the proposed site improvements near the relocated Meeting Hall would not include removal of a debris diversion berm as follows:

Re-locate the Meeting Hall to an already-disturbed meadow near existing infrastructure. The old approved site is in a slide zone as well as a sensitive creek and forest habitat. ~~This area would be returned to nature. The existing un-natural debris diversion berm would be removed, and the natural seasonal creek flow would be returned.~~

The potential impacts from removal of a debris diversion berm were evaluated in the Draft IS/MND and were mitigated to a less than significant level through mitigation measures MM4.b and MM4.e.2. Removal of the debris diversion berm is not required to mitigate any potential impacts of the proposed project. Accordingly, the clarification does not result in new impacts that were not previously considered and, therefore, recirculation of the Draft IS/MND is not required pursuant to CEQA Guidelines §15073.5.

A copy of the e-mail correspondence and project clarification information from Brian Swartz, HartMarin, dated November 16, 2010 is attached for reference.

# Letter A



## Marin Audubon Society

P.O. Box 599 | MILL VALLEY, CA 94944 | 415.477.1111 | MARINAUDUBON.ORG

October 25, 2010

Tim Haddad, environmental Coordinator  
Community Development Agency  
3501 Civic Center Drive  
San Rafael, CA 94903

Re: SPIRIT ROCK MEDITATION CENTER DRAFT INITIAL STUDY AND MITIGATED  
NEGATIVE DECLARATION

Dear Mr. Haddad:

Thank you for considering and responding to our comments on the Draft Initial Study and Mitigated Negative Declaration for the Spirit Rock Meditation Center proposed amendments to its Master Plan. The project is the modification of an approved master plan, portions of which have not been constructed. The Initial Study evaluates the proposed amendments against both the existing condition and the approved Master Plan. In the overall, the proposed amendments would correct components of the project that are in conflict with current policies of the CWP and would eliminate certain adverse impacts by moving buildings further away from the creek that runs through the property. We applaud the Center's moving many of the buildings out of the Streamside Conservation Zone and out of wetlands, however a number of adverse impacts to natural resources continue to be of concern. In addition, various impacts and proposed mitigation measures are vague and poorly defined. Some mitigations depend on plans to be developed at some future time, making it impossible to evaluate their adequacy. Finally, the figures are so small the reviewer can't read the type nor can we see enough of the site to be able to evaluate alternative locations that could be less environmentally damaging.

A-1

Five buildings would be moved further from the creek, but the dining hall building would still be located just 60 feet from the creek within the SCA. Wetland seeps would be filled and the creek would be adversely impacted by other features as described below.

### WATER QUALITY

Riprap is proposed (p. 111) to reduce the velocity of stormwater flows and stabilize the creekbank. Riprap is not a natural creek substrate and its use should be identified as an adverse impact. Riprap destroys native vegetative habitat, eliminates the absorptive and filtering capacities provided by native vegetation and is habitat for rats. Riprap should be replaced with a natural stabilization method. If this is not possible, then mitigation should be required that restores a section of creekbank that is at least twice the area that would be covered with riprap.

A-2

The use of bioswales is identified as a mitigation measure to address impacts from degraded runoff. While bioswales may be important for water quality, they can have adverse impacts. The location of these swales and the current condition of these areas should be discussed. Native vegetative habitats that would be changed should be identified and mitigation provided.

A-3

### BIOLOGICAL RESOURCES

Native Grasslands - Residence halls and dining hall would impact native grasslands, .39 acres of native grassland would be impacted by other buildings. Wastewater drip fields and the placement of solar

A-4

*A Chapter of the National Audubon Society*

## Letter A Continued

panels would also impact grasslands. Preparing a resource enhancement plan is identified as mitigation 7.b.1. The proposed native grassland to be restored is insufficient and poorly defined in other ways (equal or greater than the native grassland disturbed.) To compensate for temporal impacts and uncertain success, greater acreage should be restored - at least twice that destroyed. The solar panels should be relocated on the roofs of buildings rather than covering grassland habitat.

A-4  
con't

Trees - The project impacts to native trees is poorly defined. How many trees that would be removed under that proposed plan is not stated. The only description is of "inadvertent damage," whatever that is. Minimization, ensuring restoration (p. 156) and not substantially altering existing riparian or bay woodland habitat (P. 157) are also mentioned as mitigation. While tree impacts would undoubtedly be reduced by moving the various buildings from the creek, the nature of tree impacts still needs clarification. Replacing native trees removed at 3:1 ratio is called for, but how many trees this would be is unknown. Unless the species and number of trees that would be removed is known, the species of replacement trees that should be planted and where to plant them cannot be evaluated. With impacts so poorly defined, it is not possible to evaluate the adequacy of the mitigation

A-5

Providing a construction management and revegetation plan (page 157) is also mentioned as mitigation. How will the public be able to review and evaluate the adequacy of such a plan?

A-6

Wetlands - The reduction in wetland impacts is commendable. A building would be removed from a seep area. Seeps are unusual wetland features caused by local groundwater that coming to the surface. Again, a resource enhancement plan is called for as mitigation, and that plan would include constructing a man-made wetland in the horse pasture adjacent to Sir Francis Boulevard. The wetland is proposed to be 2:1 ratio or .4 acres with 25 foot buffer. Additional information is needed to evaluate the feasibility and potential effectiveness. Is there a location in the horse field where a similar water source exists to create a seep? If so, it would seem a seep would already be present. Is another type of wetland proposed than the seep that would be filled? Further, how would the restored wetland, if a water source does exist, be protected from damage from the horses?

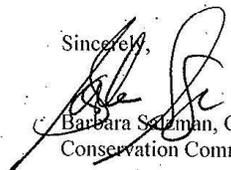
A-7

Invasive Plants - Introduction of invasive non-native plants:1) is a potential impact where existing vegetation is removed or disturbed. Again, submitting a resource enhancement plan is relied on as mitigation. The specifications for issues to be included are insufficient. Two further actions must be required to address this potential impact: 1) the disturbed area must be covered with native plant seed either by broadcasting or hydroseeding of appropriate native plants, and 2) weed removal in all denuded areas must continue until native plants cover the area. Otherwise, non-native plants will continue to invasive. Weed removal will likely be needed for years.

A-8

In conclusion, Spirit Rock is proposing significantly improved project. It just has a bit further to go, and the Initial Study should be revised as recommended above.

Sincerely,



Barbara Salzman, Co-chair  
Conservation Committee

**Letter A**

**Ms. Barbara Salzman, Co-chair, Conservation Committee, Marin Audubon Society, October 25, 2010**

**Response A-1:**

The commenter references general concerns with the discussion of several impacts and mitigation measures that are addressed in greater detail in response to comments A-2 through A-8. The commenter also expresses concern with evaluating the effectiveness of mitigation measures that require plans to be prepared at a later date. It is common to require project sponsors to prepare more detailed plans in order to demonstrate that the desired mitigations are implemented in subsequent stages of the development process. In order to ensure that plans, programs and studies adequately implement the mitigation measure, each mitigation measures:

1. Includes objective performance standards (e.g. MM.1.a.2 specifies a tree replacement ratio of 3:1 and compliance with County permit requirements as the performance standards for a future Resource Protection Plan that will mitigate potential impacts from tree removal);
2. Identifies the agency(s) that is responsible for evaluating compliance with the mitigation measure; and
3. Indicates when the mitigation is to be implemented.

By clearly defining performance criteria, responsibility and timing for mitigations, the County has identified the information necessary to reasonably justify an expectation of effective mitigation. This practice is consistent with Public Resources Code §21080(c)(2), California Code of Regulations §15070(b)(1), and case law related to mitigation.

Finally, the commenter expressed concern that the figures contained in the Draft IS/MND are too small to be evaluated. Given the size of large scale plans and cost of preparing such plans, the Draft IS/MND provides reduced scale drawings to provide general information related to project components and relationship to resources. Full scale copies of the plans are available at the Marin County Community Development Agency offices and can be viewed on-line at <http://www.co.marin.ca.us/depts/CD/main/pdf/eir/SpiritRockMPA-DraftISMND.pdf>. The County webpage includes a separate link to high resolution graphics that may be enlarged for viewing.

**RESPONSE A-2:**

The commenter states that the use of riprap to stabilize streambanks could have adverse impacts because riprap is not a natural creek substrate. As discussed on page 104 of the DIS/MND, some of the existing project site drainage currently discharges to riprap diversion pads. It is not likely that the project would significantly increase the amount of riprap used to dissipate energy at outfalls to receiving waters compared to the existing condition. Recommended mitigation measures MM4.a.2 requires the project sponsor to submit a Stormwater Control Plan (SCP) that complies with the development practices established by the Marin County Stormwater Pollution Prevention Program (MCSTOPPP). MCSTOPPP requires projects to employ best management practices (BMPs). In Marin County, BMPs typically employ biotechnical stabilization practices as

preferable to the use of riprap or other “armored” stabilization methods. To reflect this preference and to respond to the comment, the text for Mitigation Measure 4.a.2 on page 112 of the DIS/MND has been revised as follows:

**MM 4.a.2**

The project applicant shall submit a Stormwater Control Plan (SCP) to the County for the Precise Development Plans, in accordance with guidance developed by MCSTOPPP. The SCP shall describe the site design, source control, and treatment control best management practices (BMPs) such as riparian buffer zones and designs for bioswales, that would be implemented at the site to minimize imperviousness, retain or detain stormwater, match pre-project peak flow rates, and reduce pollutants in runoff to the maximum extent practicable, for the design storms regulated by the Small MS4 Permit. The SCP shall evaluate the consistency of using riprap for creek outlet protection with the project's Stream Restoration Plan and evaluate whether using riprap would cause impacts greater than if natural restoration methods are used. If the use of riprap is found to be inconsistent with the Stream Restoration Plan, biotechnical measures shall be used in lieu of riprap for outlet projection. The SCP shall include an Operation and Maintenance Plan that identifies the individuals responsible for maintenance of treatment control BMPs.

*Timing/Implementation:*            *Prior to Precise Development Plan approval and during construction*

*Enforcement/Monitoring:*        *Marin County CDA and DPW*

**RESPONSE A-3:**

The commenter requests identification of the locations of bioswales and evaluation of changes to native vegetative habitats resulting from the use of bioswales. The DIS/MND uses the terms “bioswale” and “Grasspave” interchangeably. The proposed locations for bioswales and Grasspave areas are illustrated in the Project Plans Sheets 11, 13, 16, and 18 (reference 11, on page 213 of the DIS/MND). The project plans are available for review at the Marin County Community Development Agency. In addition, final locations for the bioswales and Grasspave areas will be provided in the project Stormwater Control Plan, as required by Mitigation Measure 4.a.2, which will be submitted to the County. Bioswales and Grasspave areas would be located directly adjacent to impervious areas, such as buildings, parking areas, and roads, to treat stormwater pollutants from these impervious areas. In these already disturbed locations, the use of bioswales and Grasspave are expected to result in the water quality benefits identified in the comment, while the extent of impact to native vegetation would be deminimus.

**RESPONSE A-4:**

The commenter recommends replacing native grasslands at a two to one ratio, and recommends placing solar panels on roof tops to reduce the grassland area that is covered with structures and facilities. It is important to note that though native grasslands are a special status species, they are not protected as rare or endangered species. Where native grasslands make up a high enough percentage of the ground cover, they are considered to be a large cohesive community that should be protected. The impact analysis concludes that the project has the potential to impact large cohesive communities of native grasslands and requires that specific

mitigation methods be included in the Resource Enhancement Plan at the time that detailed drawings are developed for proposed improvements (refer to MM.7b.1). This mitigation measure is sufficient to reduce the potential impact to a less than significant level. The recommendations to increase the replacement ratio and consider alternative placement of the solar panels are noted and included here to inform decision-makers as they consider the merits of the project.

**RESPONSE A-5:**

The commenter requests additional information related to impacts associated with tree removal. The Draft IS/MND discusses tree removal in both Section 1 – Land Use and Planning (p. 82 and 83), and Section 7 – Biological Resources (p. 140, 146, 147, and 156 – 158). The Biological Resource analysis evaluates tree removal both from the perspective of forest and riparian woodland areas as a resource, as well as from the perspective of individual trees providing potential habitat for species of concern. The Draft IS/MND indicates that the greatest potential for impact would occur under the Alternate Baseline conditions. As discussed in Section 1 – Land Use and Planning (p. 83), the project sponsor submitted a report prepared by a qualified arborist that was subject to peer review. The analysis identified 29 trees which would qualify for protection under Marin County Code that are located within the project vicinity. Of these trees, one valley oak and 11 coast live oaks would be removed for construction or potentially impacted by construction. Mitigation for the loss of any trees will be at a ratio of 3:1 for in-kind species. Location of the plantings will be determined during the restoration effort by a qualified vegetation ecologist based on where the greatest habitat value can be achieved.

**RESPONSE A-6:**

The commenter asks how the public will be able to evaluate the adequacy of the construction management and revegetation plan required by mitigation measure MM 7.b.2. Compliance with mitigation measures occurs at various stages of project design and development. For MM 7.b.2, the Timing/Implementation of the mitigation measure would occur prior to approval of the Precise Development Plan and during and after construction. The Precise Development Plan is a discretionary application that will be the subject of public review. At the time of review, members of the public will have an opportunity to review project plans to confirm that they implement the mitigation measure. A Mitigation Monitoring Plan incorporating all mitigation conditions of the project will be adopted at the time of project approval, which specifies the timing for and who is responsible for verification that each project mitigation has been implemented in accordance with the approved mitigation standards, criteria and approved mitigation plans.

**RESPONSE A-7:**

The commenter asks for more information related to the location of replacement wetland habitat. Mitigation Measure MM 7.b.3 requires wetland mitigation for the filling of an approximately 0.02 acre seep during construction of the Teacher and Staff Village. A wetland presently exists in the lower limits of the property, near the horse pasture, that will be enhanced at a minimum ratio of 2:1 to compensate for impacts to the seep. There is a water source present in this area as it currently supports wetland-adapted plants and function. Site topography will be enhanced to increase the overall size of the wetland while increasing habitat value. MM 7.b.3 further requires the

installation of a 25-foot upland buffer that would be planted with native grass and shrub species to protect the wetland area. Performance standards will be required to ensure the created habitat functions as a self-sustaining wetland system. The commenter's concern related to potential wetland damage from horses is noted and the following revisions are recommended to clarify that the required buffering is intended to protect the wetland from damage, including damage from equestrian activity, consistent with the WCA policies of the CWP.

**MM 7.b.3**

The project sponsor shall ensure that the project is constructed in a manner that minimizes disturbance of wetland resources and ensure that impacted wetland areas are replaced at a 2:1 ratio. To implement this mitigation measure, the applicant shall submit a resource enhancement plan at the time they file the Precise Development Plan that includes the following wetland restoration and replacement measures for construction activity consistent with the WCA policies contained in the CWP.

- Prior to construction, the project sponsor shall obtain appropriate County, state and federal permits for impacts to wetlands and/or other waters of the U.S. This will include, but is not limited to, obtaining permits from the County, U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and/or California Department of Fish and Game. The conditions of these agreements shall serve as additional provisions.
- The project sponsor shall compensate for the loss of the jurisdictional wetland at a ratio of 2:1 (or as agreed upon by the permitting agencies) within the project area. The restoration effort shall include constructing a man-made mitigation wetland in the horse pasture adjacent to Sir Francis Drake Boulevard and wetland plant revegetation. The newly constructed wetland shall be 0.4 acres, a 2:1 impact ratio. It shall be buffered from equestrian activity and the development by a 25-foot upland buffer planted with native grass and shrub species, or by other appropriate landscaping or agricultural fencing to protect the wetland area in compliance with the WCA policies of the CWP. It shall require implementation of a 5-year monitoring program with applicable performance standards, including but not limited to, establishing 80% survival rate of restoration plantings, absence of invasive plant species, absence of erosion features, and presence of a functioning, self-sustainable wetland system.

*Timing/Implementation:*      *Prior to, during, and after construction*

*Enforcement/Monitoring:*      *Marin County CDA*

**RESPONSE A-8:**

The commenter recommends two additional actions to prevent the introduction of invasive species. Mitigation measure MM 7.c.1 requires the project sponsor to employ Best Management Practices (BMPs) to minimize introduction and recruitment of invasive non-native plant species. These include revegetation of all disturbed areas with native plantings and use of certified, weed-free materials dominated by native species for erosion

control and revegetation. The specific BMPs may include the revegetation specifications suggested by the commenter if the specific conditions of the site are well suited to hydroseeding or broadcasting. New infestations of invasive plants are likely to be minimized by implementation of BMP's. MM 7.c.1 includes post installation monitoring and invasive species controls.

# Letter B

OCT 26 2010 PM 3:58 Planning



## MARIN MUNICIPAL WATER DISTRICT

220 Nellen Avenue Corte Madera CA 94925-1169  
www.marinwater.org

October 26, 2010

Mr. Tim Haddad  
Environmental Coordinator  
Marin County Community Development Agency – Planning Division  
3501 Civic Center Drive, Room 308  
San Rafael, California 94903

**SUBJECT: Draft Negative Declaration of Environmental Impact for the Spirit Rock Master Plan Amendment**

Dear Tim,

The Marin Municipal Water District (MMWD) has reviewed the Draft Negative Declaration of Environmental Impact for the proposed Spirit Rock Master Plan Amendment and the Initial Study on which the draft declaration is based, and offers the following comments:

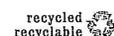
The site's current MMWD water entitlement is 7.49 acre feet per year (af/yr), with a 5-year average annual consumption of approximately 7-af/yr. Based on our understanding of the proposed project, which includes new structures and increased on-site activities and populations, there would be an additional demand of approximately 10-af/yr without consideration for water conserving features or management practices. As correctly stated in the Initial Study, the District has adequate resources to accommodate the projected additional demand.

Mitigation Measure 12.c.1 requires the preparation and submittal of a Water Management Plan at some future point in time to demonstrate that through a variety of design and management practices the site's demand for water from MMWD would not exceed the current 7.49-af/yr allocation. Subparagraph "c" of the Measure suggests that if the project's water demand were to exceed the current MMWD entitlement (presumably after additional site improvements and increased activities) that the project sponsor would implement contingency plans, which could include reduction or cessation of activities. Is the reduction or cessation of activities realistic after project entitlement is granted and physical improvements to the site completed?

B-1

Subparagraph "d" of the Measure indicates that should water demand exceed the site's MMWD allocation that the project proponent could import water from off-site locations. First, this seems to counter the statement in Subparagraph "c" where it is suggested that demand would be maintained at the existing annualized use or allocation maximum through design features and management practices. Regardless, the suggestion that excess demand would be met with the importation of potable supplies from off-site locations raises the questions of from where would the off-site supply

B-2



# Letter B Continued

Mr. Tim Haddad  
October 26, 2010  
Page 2

come from, and does that off-site source have adequate unallocated supplies. Examined from the perspective of CEQA, that statement appears to suggest that there is a potential impact that has not been fully disclosed or evaluated. At the very least the Initial Study should identify a specific source or at least list a range of possible sources and the availability of adequate unallocated supplies should the proposed project require any water in excess of the current MMWD entitlement (assuming the project does not request an increased allocation from MMWD). Further, the Initial Study should evaluate the impacts associated with importation (presumably by tanker truck) such as air quality, greenhouse gas emissions, noise, and transportation and traffic. Such a description of the source of off-site supplies and the evaluation of impacts associated with importation would ensure consistency with Section 15378(a) of the CEQA Guidelines.

B-2  
con't

B-3

In addition to the preceding comments on the CEQA document, the District wants to provide to the County two merit comments:

1. The District is currently working on updates/revisions to our existing water conservation ordinances, and those provisions, when adopted by our Board of Directors, would apply to any portions of the proposed project not constructed/in place at the time of adoption.
2. The proposed installation and use of rainwater catchment and grey water systems will require District review prior to approval to ensure that no cross-connections occur with potable systems.

B-4

If you have any questions please let me know,



Dain Anderson  
Environmental Services Coordinator

**Letter B Mr. Dain Anderson, Environmental Coordinator, Marin Municipal Water District, October 26, 2010**

**Response B-1:** The Project sponsor proposes to implement a Resource Protection Plan (RPP) to control land use in a manner that is consistent with environmental constraints (e.g. traffic capacity and water quality) at the project site. The RPP will require modifications to project operations in order to adhere to quantifiable criteria established for resource protection. Mitigation Measure 12.c.1.c adds water capacity to the resource constraints that must be managed through the RPP. Before new construction is permitted, and before population increase is allowed at the site, the applicant will need to demonstrate that activity at the site would not result in the use of more than 7.49 acre-feet of water in a year. Under the RPP, the project sponsor is required to modify activity to adhere to this threshold, even if that requires reductions in the level of activities, or the cessation of activities. Because the project sponsor has proposed using the RPP to manage land use at the site, and has accepted and incorporated water use limitations into the project, MM 12.c.1 is a realistic and feasible mitigation measure that affords the project sponsor flexibility to manage events during any given year to comply with the quantified thresholds for water service.

**Response B-2:** MMWD has adequate resources to accommodate the projected additional demand that would be generated at project buildout. If no water conservation measures are implemented at the project site, the project sponsor would need to enter into an expanded water service agreement with MMWD to increase the property allocation. The project sponsor proposes, however, to implement water conservation measures that may obviate the need for any such modification to the agreement. Mitigation Measure 12.c.1 is designed to ensure that project operations do not exceed the supply limits established by MMWD by increasing water supply, managing property operations, and/or by implementing conservation methods. Subparagraph c indicates that this can be accomplished by modifying or reducing activities at the site, and subparagraph d allows for compliance by increasing water supply from sources other than MMWD to address temporary needs that would most likely result from special events. Because the water supply is allocated on an annual basis, the project sponsor has an opportunity to either manage the existing allocation in a way that avoids the need for a temporary water supply, or to increase the property allocation through an expanded water service agreement, and there is no need to include provisions for a temporary allocation from other sources. Mitigation measure 12.c.1 will be modified as follows to remove the reference to temporary water supply:

**MM.12.c.1** The project sponsor shall operate the property in a manner that does not result in water use that exceeds the available supply limits for the site (presently 7.49 acre-feet of water in a year). This mitigation measure shall be implemented by submitting a Water Management Plan, as part of the Resource Protection Plan, to demonstrate that the daily operations would not result in use of more than 7.49 acre-feet of water in a year by providing necessary documentation in conjunction with the Precise Development Plan application to comply with the following:

1. The project sponsor shall submit a Water Management Plan, as part of the Resource Protection Plan to demonstrate that use of the project site would not result in the use of more water than is allocated under the water service agreement with MMWD (presently 7.49 acre-feet of water in a year). As an alternative, the project sponsor may enter into an expanded water service agreement with MMWD to secure an additional allocation for the project site to serve total projected demand. The Water Demand Management Plan shall demonstrate that water savings from conservation, recycling, and reuse of water at the project site is adequate to offset increases in demand that are expected to result from increased activity at the site, and shall include the following:
  - a. Demonstrates that activity at the site will not generate demand for domestic water from MMWD in excess the supply that has been allocated to the property (presently 7.49 acre-feet per year);
  - b. Establishes monitoring equipment and practices to track water consumption to ensure compliance with performance objectives;
  - c. Establishes contingency plans that describe specific actions that shall be taken to prevent consumption of more than the allocated supply. Contingency plans may include reduction or cessation of classes, events, activities, and maintenance practices, and the elimination of overnight visitation;
  - ~~d. To the extent that compliance with water consumption limitations can only be accomplished with temporary facilities (e.g., imported water), the WMP shall include documentation (e.g. contracts and service agreements) a plan identifying the quantity of water that would be imported, and the method of supply and distribution. Contracts shall also include provisions for the removal of temporary facilities;~~
  - e. Enforcement provisions that may include reductions in daily and special event population, cancellation of future events, remediation measures, and financial penalties for any violation of the WMP;
  - f. Includes contingency plans that describe specific actions that shall be taken to prevent water consumption in excess of the approved allocation; and
  - g. Identify reporting commitments to document the monitoring results and identify contingency measures that were required in order to adhere to supply limitations.
2. Enter into a Watershed Protection Agreement with the Marin Municipal Water District to ensure sound stewardship of Spirit Rock land and water resources.

*Timing/Implementation: Prior to increasing daily peak occupancy to more than 315 persons or peak open*

**EXHIBIT A DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION RESPONSE TO COMMENTS**

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*house/event capacity to more than 150 persons, and prior to construction*

*Enforcement/Monitoring: Marin County CDA; MMWD*

**Response B-3:** MMWD has adequate resources to accommodate the projected additional demand that would be generated at project buildout. As discussed in Response B-2, Mitigation Measure 12.c.1.d would be modified to remove provisions related to temporary water supply.

**Response B-4:** The County appreciates the Marin Municipal Water District's comments on the proposed project and will consider these issues during analysis of project merits.

## Letter C

OCT 29 2010 PM 12:53 Planning



Arnold Schwarzenegger  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Cathleen Cox  
Acting Director

October 27, 2010

Tim Haddad  
Marin County  
3501 Civic Center Drive, Room 308  
San Rafael, CA 94903

Subject: Spirit Rock Master Plan Amendment  
SCH#: 2010091075

Dear Tim Haddad:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on October 26, 2010, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

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# Letter C Continued

## Document Details Report State Clearinghouse Data Base

**SCH#** 2010091075  
**Project Title** Spirit Rock Master Plan Amendment  
**Lead Agency** Marin County

**Type** MND Mitigated Negative Declaration  
**Description** The project sponsor proposes minor amendments to the Master Plan granted for the Spirit Rock Meditation Center in 1988. Following preparation of an Initial Study and adoption of a Negative Declaration, the 1988 Master Plan was approved to establish a development area envelope and provided a framework governing the uses, the intensity of uses, and the development of the site. The proposed Master Plan Amendment is described as "Phase 4" of the project ( supplementing, and in some cases modifying, the 1988 Master Plan and its implementing Precise Development Plans, Phases 1, 2, and 3).

**Lead Agency Contact**

**Name** Tim Haddad  
**Agency** Marin County  
**Phone** (415) 499-6269  
**email**  
**Address** 3501 Civic Center Drive, Room 308  
**City** San Rafael  
**Fax**  
**State** CA **Zip** 94903

**Project Location**

**County** Marin  
**City**  
**Region**  
**Lat / Long** 38° 1' 22.7" N / 122° 38' 48" W  
**Cross Streets** Sir Francis Drake Blvd. and San Geronimo Valley Drive  
**Parcel No.** 172-350-35  
**Township** **Range** **Section** **Base**

**Proximity to:**

**Highways**  
**Airports**  
**Railways**  
**Waterways**  
**Schools**  
**Land Use** AG2(Agriculture, 1 residential unit per 10-30 acres); ARP-20 (Agricultural, Residential Planned District; 1 residential unit per 20 acre.

**Project Issues** Air Quality; Archaeologic-Historic; Biological Resources; Public Services; Septic System; Sewer Capacity; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Wetland/Riparian; Landuse

**Reviewing Agencies** Resources Agency; Department of Fish and Game, Region 3; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 4; Regional Water Quality Control Board, Region 2; Department of Toxic Substances Control; Native American Heritage Commission

**Date Received** 09/27/2010 **Start of Review** 09/27/2010 **End of Review** 10/26/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

**EXHIBIT A DRAFT INITIAL STUDY/MITIGATED NEGATIVE DECLARATION RESPONSE TO COMMENTS**

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**Letter C**                      **Mr. Scott Morgan, Director of the State Clearinghouse, October 27, 2010**

**Response C-1:**              Letter is noted. No edits to the Draft IS/MND are necessary.

Marin County appreciates the confirmation letter from the State Clearing House.

## Letter D

Page 1 of 2

**From:** Brian [brian@hartmarin.com]  
**Sent:** Tuesday, November 16, 2010 10:31 AM  
**To:** Brian Swartz; 'Haddad, Timothy'  
**Cc:** Scott Davidson; 'Tejirian, Jeremy'; 'Warner, Rachel'; 'Corella-Pearson, Veronica'; Rob Hart; Amanda Irish  
**Subject:** RE: SR4 - IS/MND - Audubon & MMWD Letters (Revision #2 w/Attachment)  
**Attachments:** SR4 - MPA Page 5-8 Revision.pdf

Tim:

In response to your email this morning here is a revised clarification of the Spirit Rock Master Plan Amendment project description in response to comment letters. The clarification relating to the "removal of a debris diversion berm" is paragraph #2 below under the Audubon Letter. Water Quality heading. Please call or email me with any questions or comments. Thank you.

### ***MMWD***

Clarification to the Spirit Rock project description regarding potable water:

Spirit Rock has a potable water entitlement of 7.49 af/yr and currently uses about 7.00 af/yr. The existing water meter at Sir Francis Drake is 8" in diameter. This meter and all existing water mains are already sized for the complete build out of the Master Plan.

If and when building permits are requested for buildings whose use would cause water use to exceed 7.49 af/yr, then prior to issuance of said building permits, Spirit Rock shall apply for an increased water entitlement to cover the increased use proposed by those permits. MMWD has indicated that these water entitlements are available. The MPA application shows that this growth and thus these requests will be spread out over a long period of time over the next 20 years.

All water-savings measures required by MMWD will be followed by Spirit Rock.

### ***Audubon Letter***

**Water Quality** - The Audubon letter make reference to "rip rap on page 111." The only reference to rip rap we found is on Sheet 11, 13, & 16 where the placement is recommended by the civil engineer as a drainage note on the proposed plan. Mitigation measures are already proposed by the County that require Spirit Rock to follow Best Practices, MCSTOPP and all other County water quality regulations as performance criteria, at the time grading and drainage plans are submitted with the Precise Development Plan.

The "Removal of a debris diversion berm" mentioned in the Initial Study was inadvertently left over from an earlier iteration of the project. It does not show up on the plans and our improper reference to it has been removed from page 5-8 of the project description [see amended page attached].

We agree that the location of bio-swales needs to respect native species. Currently, the only bio-swales shown on the plans are along the high side of the main road between the proposed Dining Hall and Meeting Hall and leading from the Village Commons to the Staff Parking lot. The vast majority of this area is currently asphalt pavement and thus no native species will be disturbed. Other locations for bio-swales will be proposed as the plans move into the PDP phase. I believe there are mitigation measures in place that require careful planning and review of these green development practices.

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## Letter D Continued

Page 2 of 2

**Grasslands** - Spirit Rock has successfully mitigated native grasslands in the past and proposes to continue this practice under the guidance of experienced biologists in accordance with the methods proposed in the application. It is important to recognize that while the proposed Master Plan Amendment has modest biological impacts that can be mitigated, that impact is less than in the current Master Plan. Audubon is mistaken in stating that this is a part of the Resource Protection Plan [misabeled 'Enhancement Plan'].

**Solar Panels** - At the PDP phase for the Staff Village we will be proposing to move a large number of the solar panels from the 'solar farm' area to proposed carport roofs in the employee parking lot.

**Trees** - The reason that Audubon finds the impact to trees to be poorly defined is that no trees are proposed to be removed to accomplish the Master Plan Amendment. Three quercus agrifolia [live oak] planted by Spirit Rock as 36" box trees in 2000 are proposed to be transplanted. Two are located at the proposed north wing of the Village Commons building [shown as Pentagon 5 on Sheet 10] and one is located at the proposed location for the Administration Building [shown as Pentagon 4 on Sheet 10]. These will be transplanted to the south side of the south wing of the Village Commons as shown on Sheet 11. Spirit Rock has good experience in transplanting quercus agrifolia on site as large as 30 feet tall and 120" box. An experienced team, including arborist MacNair & Associates and transplanter Valley Crest would perform the operation.

**Wetlands** - Audubon is mistaken in stating that the Resource Protection Plan [misabeled 'Enhancement Plan'] is related to the wetlands issue. These items are unrelated. Audubon also misses the fact that our proposed wetland mitigation is a small extension of a large existing wetland and thus adequate conditions exist for its success. This existing wetland was recommended by the biologist and confirmed by the Army Corps of Engineers as suitable to expand for mitigation.

**Invasive Plants** - We are not proposing any 'denuded' areas. All disturbed areas shall be replanted with native species per the conditions of approval of the existing Master Plan. We don't propose to change that condition and have followed it carefully over the past 20 years as evidenced by the lack of invasive species on the land.

Brian

Brian Swartz | HARTWEST | HARTMARIN | 415.897.4400 (o) | 415.272.6897 (c)

Real Estate Development Consultants

75 Rowland Way, Suite 140, Novato, CA 94945

Contents & attachments are confidential & proprietary. Do not forward without express written consent.

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## Letter D Continued

ADMINISTRATION OFFICES & RETREAT RECEPTION

- General & retreat reception and administration offices
- Employee lounge and conference room

Square Feet		
Support	Program	Total
286 +	4,402 =	4,688

**Important:** Employment at Spirit Rock is a form of religious practice and is only performed by devout religious practitioners.

FOREST MEADOW

- Remove septic facilities, improve technology, and relocate to non-public areas.
- Restore meadow to more natural state.
- Additional staff, teacher and ADA parking – five + spaces
- Walking path and free-span bridge away from top of bank.
- Public Art [Buddhist theme]

PARKING LOT IMPROVEMENTS

- Western paved lot converted to overnight residential retreat use.
- Eastern gravel parking lot paved and striped for day use, 14 spaces added.
- Overflow grasspave lot for fifty plus cars during special events [see Traffic Study]
- Berm & drainage improvements to protect creek and water quality
- Shade structure – program information distribution kiosk

SITE IMPROVEMENTS

- Re-locate the Meeting Hall to an already-disturbed meadow near existing infrastructure. The old approved site is in a slide zone as well as a sensitive creek and forest habitat. ~~This area would be returned to nature. The existing un-natural debris diversion berm would be removed, and the natural seasonal creek flow would be returned.~~
- Solar farm between Meeting Hall and Dining Hall as well as solar panels on those roofs.
- The existing asphalt-paved access road in front of Meeting Hall will be converted to HartMarin's Green-Street technology with Grasspave and featured paving. All utilities will be underground.
- Indigenous, fire-safe and low-water-consumption landscaping will be utilized. A more intuitive signage program will be instituted.
- The Development Area Boundary will be reduced in order to take advantage of infill development on already disturbed areas that are already served by infrastructure.
- The septic system will be improved to increase the level of advanced treatment for all wastewater flows, both existing and new. The result will be an overall improvement in ground water quality at Spirit Rock.

**Letter D**

**Mr. Brian Swartz, HartMarin, November 16, 2010**

**Response D-1:**

E-mail is noted. No edits to the Draft IS/MND are necessary.

The County of Marin appreciates the project clarification.

**ERRATA**

Listed below are the complete edits that have been made to the text of the Draft Initial Study/Mitigated Negative Declaration (Draft IS/MND). The edits are demarcated with revision marks (underline for new text, ~~strike-out~~ for deleted text) for easy reference.

Global Correction

Throughout the Draft IS/MND, replace the term ~~Special Events Management Plan~~ with the term Special Events Management Program. The Mitigation Monitoring and Reporting Program reflects this change.

Page 112 – Mitigation Measure 4.a.2

**MM 4.a.2**

The project applicant shall submit a Stormwater Control Plan (SCP) to the County for the Precise Development Plans, in accordance with guidance developed by MCSTOPPP. The SCP shall describe the site design, source control, and treatment control best management practices (BMPs) such as riparian buffer zones and designs for bioswales, that would be implemented at the site to minimize imperviousness, retain or detain stormwater, match pre-project peak flow rates, and reduce pollutants in runoff to the maximum extent practicable, for the design storms regulated by the Small MS4 Permit. The SCP shall evaluate the consistency of using riprap for creek outlet protection with the project's Stream Restoration Plan. If the use of riprap is found to be inconsistent with the Stream Restoration Plan, biotechnical measures shall be used in lieu of riprap for outlet projection. The SCP shall include an Operation and Maintenance Plan that identifies the individuals responsible for maintenance of treatment control BMPs.

*Timing/Implementation: Prior to Precise Development Plan approval and during construction*

*Enforcement/Monitoring: Marin County CDA and DPW*

Page 133 – Mitigation Measure 6.a

**MM.6.a**

The project sponsor shall operate the project site in a manner that will avoid traffic conflicts, preserves emergency vehicle access, and maintain intersection levels of service at or better than the County's level of service "D" threshold. This mitigation measure shall be implemented by submitting a Transportation Management Plan (TMP) demonstrating compliance with the above operational objectives. The TMP shall employ a combination of visitor information, directional signs and wayfinding information, to alert guest to circulation issues associated with daily operations. The TMP shall also include Special Event Provisions to govern traffic and circulation operations during larger classes and events. Before increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons,~~in conjunction with the Precise Development Application,~~ the project sponsor shall submit a Transportation Management Plan (TMP) for approval by the County that

either demonstrates that the following improvements and programs have been implemented, or establishes provisions for their implementation:

- a. The TMP shall include circulation information and direction to assist visitors to the project site. At a minimum circulation information shall include:
  1. A NO U TURN sign should be installed on westbound Sir Francis Drake at Railroad Avenue to further discourage motorists from making U-turns and instead to use the "advised exit route" from Spirit Rock to eastbound Sir Francis Drake;
  2. Provide information to guests and visitors to alert them of the "advised exit route" (i.e., right-turn from Spirit Rock driveway onto westbound Sir Francis Drake Boulevard, left-turn from Sir Francis Drake Boulevard to Railroad Avenue, left-turn from Railroad Avenue to San Geronimo Valley Drive, and right-turn from San Geronimo Valley Drive to eastbound Sir Francis Drake Boulevard);
  3. Incorporate improved wayfinding signage along Railroad Avenue and San Geronimo Valley Drive to clearly designate the advised route and to reduce potential confusion and wrong turns on Woodacre Streets by Spirit Rock drivers;
- b. The TMP will establish traffic reduction measures to encourage or require car pooling and use of transit by providing financial incentives to use other than single-occupant vehicles to get access to the project site;
- c. The TMP will include a ~~Special Events Management Plan~~Special Events Management Program (SEMP) that includes the following for larger classes and special events:
  1. identify traffic control measures (e.g. cones, directional signs, parking attendants, flag people, etc.) as needed to assist with safe circulation on the project site and in the project vicinity;
  2. The SEMP will establish provisions for providing notification of larger classes and special events to service providers, transportation providers, the community, and the County for all special and largely attended events. A master schedule of all site events shall be posted prominently on-line at least four weeks before all scheduled events;
  3. The SEMP will establish scheduling measures to avoid traffic conflicts during periods of high traffic volume in the project vicinity and to "meter" in-bound and out-bound traffic, if necessary, to preserve LOS D operations.
- d. The TMP will establish enforcement provisions that may include immediate cessation of activities, reductions in daily and special event populations, and financial penalties for any violation of the TMP;
- e. The TMP shall establish monitoring and reporting protocol to document compliance with the TMP, report monitoring results and identify

contingency measures that were required in order to adhere to performance criteria; and

- f. The TMP will be prepared to County standards and specifications and shall include funding provisions to either defray County costs associated with peer review of a TMP prepared by the applicant, or to pay for County preparation of the TMP. The TMP shall also include a funding mechanism to allow for County monitoring of TMP compliance.

*Timing/Implementation:* Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to Precise Development Plan approval

*Enforcement/Monitoring* Marin County CDA and DPW

**Page 135 – Mitigation Measure 6.c**

**MM.6.c**

The project sponsor shall operate the site to ensure emergency vehicle access and to prevent overflow parking on surrounding streets. This mitigation shall be implemented by submitting a ~~Special Events Management Plan~~ Special Events Management Program (SEMP) in conjunction with the Precise Development Plan for review and approval by the County prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons. The SEMP shall establish provisions for coordinating special events with emergency service providers to ensure safe circulation and emergency vehicle access throughout the events. The SEMP may include the following:

1. Provisions that include notification to emergency service providers of large events that have the potential to generate an on-site population of more than 500 people,
2. Circulation controls, (e.g., parking attendants, installation of temporary directional signs and pylons, etc.) to preserve emergency vehicle access at the project site;
3. On site police and fire control arrangements and communication systems;
4. Provisions for standby or alternate personnel, equipment and or facilities in the event that attendance exceeds pre-event estimates; and
5. Provisions for emergency medical and first aid services.

*Timing/Implementation:* Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to Precise Development Plan approval

*Enforcement/Monitoring* Marin County Fire Department

Page 136 – Mitigation Measure 6.d

**MM.6.d**

The project sponsor shall operate special events to avoid overflow parking outside of approved parking areas for special events. This mitigation measure will be implemented by submitting a ~~Special Events Management Plan~~Special Event Management Program (SEMP) in conjunction with the Precise Development Plan application for review and approval by the County. The SEMP shall include provisions to govern all activities that could result in an on-site population of more than 560 people. The TMP should include program descriptions (e.g., carpool matching program, public transportation, private shuttle services, a reservation system, communication plans), incentives (e.g., fees and discounts to encourage carpooling, bus use, bicycling and walking), and metrics (e.g., mode targets, level of service at key intersections during open house or special events, parking limits).

- a. The TMP should include notification requirements that provide the County with annual updates of all scheduled or anticipated large classes and special events, the estimated attendance, and traffic and parking management plans, including emergency access provisions, that will be employed during the events.
- b. The Transportation Management Plan should also include details on how necessary services will be funded, how adherence to the vehicle limitations will be enforced, and shall include penalties for non-adherence to plan goals and metrics.

*Timing/Implementation: Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior ~~Prior~~ to Precise Development Plan Approval*

*Enforcement/Monitoring: Marin County CDA and DPW*

Page 159 – Mitigation Measure 7.b.3

**MM 7.b.3**

The project sponsor shall ensure that the project is constructed in a manner that minimizes disturbance of wetland resources and ensure that impacted wetland areas are replaced at a 2:1 ratio. To implement this mitigation measure, the applicant shall submit a resource enhancement plan at the time they file the Precise Development Plan that includes the following wetland restoration and replacement measures for construction activity consistent with the WCA policies contained in the CWP.

- Prior to construction, the project sponsor shall obtain appropriate County, state and federal permits for impacts to wetlands and/or other waters of the U.S. This will include, but is not limited to, obtaining permits from the County, U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and/or California Department of Fish and Game. The conditions of these agreements shall serve as additional provisions.

- The project sponsor shall compensate for the loss of the jurisdictional wetland at a ratio of 2:1 (or as agreed upon by the permitting agencies) within the project area. The restoration effort shall include constructing a man-made mitigation wetland in the horse pasture adjacent to Sir Francis Drake Boulevard and wetland plant revegetation. The newly constructed wetland shall be 0.4 acres, a 2:1 impact ratio. It shall be buffered from equestrian activity and the development by a 25-foot upland buffer planted with native grass and shrub species, or by other appropriate landscaping or agricultural fencing to protect the wetland area in compliance with the WCA policies of the CWP. It shall require implementation of a 5-year monitoring program with applicable performance standards, including but not limited to, establishing 80% survival rate of restoration plantings, absence of invasive plant species, absence of erosion features, and presence of a functioning, self-sustainable wetland system.

Timing/Implementation: *Prior to, during, and after construction*

Enforcement/Monitoring: *Marin County CDA*

Page 182 – Mitigation Measure 11.a.4

**MM 11.a.4** The applicant shall host special events in a manner that avoids activities that create the risk of fire, and to ensure that emergency personnel are able to respond to calls for service at the site. This mitigation measure shall be implemented prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons by submitting a Precise Development Plan Special Events Management Program (SEMP) application for approval by the County ~~that incorporates a Special Events Management Plan (SEMP)~~ that will ensure adequate notification and coordination with the Fire Department to ensure staffing and equipment are available for events that include any of the following:

- a. Total daily attendance by more than 500 people;
- b. Outdoor cooking or open flames; and/or
- c. Attendance or activities that generate demand for overflow parking in excess of the 321 spaces available on site.

The SEMP may include the following:

- Provisions that include notification to emergency service providers of large events that have the potential to generate an on-site population of more than 500 people,
- Circulation controls, (e.g., parking attendants, installation of temporary directional signs and pylons, etc.) to preserve emergency vehicle access at the project site;
- On site police and fire control arrangements and communication systems;

- Provisions for standby or alternate personnel, equipment and or facilities in the event that attendance exceeds pre-event estimates; and
- Provisions for emergency medical and first aid services.

*Timing/Implementation:* Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to approval of Precise Development Plan application.

*Enforcement/Monitoring:* Marin County Fire Department

Page 183 – Mitigation Measure 11.b.1

**MM 11.b.1** The applicant shall host special events in a manner that avoids activities that create the risk that law enforcement officers are able to respond to calls for service at the site. This mitigation measure shall be implemented prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons by submitting a Precise Development Plan application for approval by the County that incorporates a Special Events Management Plan ~~Special Events Management Program~~ (SEMP) that will ensure adequate notification and coordination with the Sherriff Department to establish necessary arrangements, including funding, to ensure that staffing and equipment are available for events that include total daily attendance of more than 500 people.

*Timing/Implementation:* Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to approval of Precise Development Plans

*Enforcement/Monitoring:* Marin County Sherriff Department

Page 189 – Mitigation Measure 12.c.1

**MM.12.c.1** The project sponsor shall operate the property in a manner that does not result in water use that exceeds the available supply limits for the site (presently 7.49 acre-feet of water in a year). This mitigation measure shall be implemented by submitting a Water Management Plan, as part of the Resource Protection Plan, to demonstrate that the daily operations would not result in use of more than 7.49 acre-feet of water in a year by providing necessary documentation prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons in conjunction with the Precise Development Plan application to comply with the following:

3. The project sponsor shall submit a Water Management Plan, as part of the Resource Protection Plan to demonstrate that use of the project site would not result in the use of more water than is allocated under

the water service agreement with MMWD (presently 7.49 acre-feet of water in a year). As an alternative, the project sponsor may enter into an expanded water service agreement with MMWD to secure an additional allocation for the project site to serve total projected demand. The Water Demand Management Plan shall demonstrate that water savings from conservation, recycling, and reuse of water at the project site is adequate to offset increases in demand that are expected to result from increased activity at the site, and shall include the following:

- a. Demonstrates that activity at the site will not generate demand for domestic water from MMWD in excess the supply that has been allocated to the property (presently 7.49 acre-feet per year);
- b. Establishes monitoring equipment and practices to track water consumption to ensure compliance with performance objectives;
- c. Establishes contingency plans that describe specific actions that shall be taken to prevent consumption of more than the allocated supply. Contingency plans may include reduction or cessation of classes, events, activities, and maintenance practices, and the elimination of overnight visitation;

~~d. To the extent that compliance with water consumption limitations can only be accomplished with temporary facilities (e.g., imported water), the WMP shall include documentation (e.g. contracts and service agreements) a plan identifying the quantity of water that would be imported, and the method of supply and distribution. Contracts shall also include provisions for the removal of temporary facilities;~~

~~e.d.~~ Enforcement provisions that may include reductions in daily and special event population, cancellation of future events, remediation measures, and financial penalties for any violation of the WMP;

~~f.e.~~ Includes contingency plans that describe specific actions that shall be taken to prevent water consumption in excess of the approved allocation; and

~~g.f.~~ Identify reporting commitments to document the monitoring results and identify contingency measures that were required in order to adhere to supply limitations.

- 4. Enter into a Watershed Protection Agreement with the Marin Municipal Water District to ensure sound stewardship of Spirit Rock land and water resources.

*Timing/Implementation: Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to construction*

*Enforcement/Monitoring: Marin County CDA; MMWD*

## **MITIGATION, MONITORING AND REPORTING PROGRAM**

A Mitigation, Monitoring, and Reporting Program (MMRP) is required for the proposed project because the Draft IS/MND identified potentially significant impacts and measures were identified to mitigate those impacts.

MMRP has been prepared pursuant to the California Public Resources Code, which requires public agencies to “adopt a reporting and 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 numbering of the individual mitigation measures follows the numbering sequence as found in the Draft IS/MND.

The County of Marin Community Development Agency (CDA) will be the primary agency, but not the only agency, responsible for implementing the mitigation measures. CDA will continue to monitor mitigation measures that are required to be implemented during the operation of the project.

The MMRP is presented in tabular form on the following pages. The components of the MMRP are described briefly below:

- **Mitigation Measures:** The mitigation measures are taken from the Draft IS/MND, in the same order that they appear in the Draft IS/MND. No revisions were necessary to the mitigation measures included in the Draft IS/MND.
- **Mitigation Timing:** Identifies at which stage of the project mitigation must be completed.
- **Monitoring Responsibility:** Identifies the party that is responsible for mitigation monitoring.
- **Compliance Verification Responsibility:** Identifies the party that is responsible for verifying compliance with the mitigation. In some cases, verification will include contact with responsible state and federal agencies.

### 1988 Mitigation Measures

The MMRP also includes a reference to Mitigation Measures that were adopted at the time the 1988 Master Plan was approved. In all instances, the 1988 mitigation measures have either been implemented and are complete, will now be implemented by new mitigation measures created as part of this Master Plan Amendment, or will be implemented by new ordinances (e.g. water conservation ordinance) that were adopted after 1988. The final section of the MMRP identifies the 1988 mitigation measures and indicates whether the measure has been completed, or identifies the new mitigation or ordinance that will be used to implement the measure in conjunction with the Master Plan Amendment.

**MITIGATION MONITORING AND REPORTING PROGRAM**

Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
<b>1. Land Use and Planning</b>				
<b>MM.1.a.1</b>	The project sponsor shall undertake construction to avoid wetland areas and to maintain a minimum separation between new structures and improvements of 20 feet. This mitigation measure shall be implemented through submittal of a Precise Development Plan for review and approval by the County that establishes a setback of no less than 20 feet around the two wetland areas located in the Teacher and Staff Village.	CDA	<i>Prior to approval of the Precise Development Plan</i>	
<b>MM.1.a.2</b>	The sponsor shall construct the project in a manner that minimizes tree removal and establishes a program for replacing removed trees. This mitigation measure shall be implemented through development and submittal of a Resource Protection Plan (RPP) that includes construction practices to protect trees that are planned to be retained, and to replace trees that are planned for removal, and that incorporates other appropriate management practices in accordance with Section 22.27.100 of the Marin Development Code. The RPP shall be submitted for review and approval by the County in conjunction with the Precise Development application and shall include provisions for replacing trees at a 3:1 ratio and shall demonstrate compliance with all other requirements of County tree removal permits.	CDA	<i>Prior to and during construction</i>	
<b>4. Water</b>				
<b>MM 4.a.1</b>	The applicant shall construct the project in a manner that prevents an increase in pre-development peak stormwater runoff discharge rates, for the design storms regulated by the Small MS4 Permit, through "green" practices (e.g. bioswales and "GrassPave" for roads and parking areas) and design. At the time a Development Plan application is submitted for review, the applicant shall submit a site hydrologic analysis prepared by a civil engineer. The hydrologic analysis shall demonstrate that the Precise Development Plan shall not substantially change drainage patterns, or the rate or volume of surface runoff for the 10-year, 25-year, 50-year and 100-year storm events from site changes in impervious/pervious surfaces, and that the change in topography, drainage areas, and runoff volumes would not be substantial. The Precise Development Plans shall not significantly affect site hydrology by substantially changing drainage patterns or the rate	CDA and DPW	<i>Prior to Precise Development Plan approval</i>	

**MITIGATION MONITORING AND REPORTING PROGRAM**

<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	or volume of surface runoff.			
<b>MM 4.a.2</b>	The project applicant shall submit a Stormwater Control Plan (SCP) to the County for the Precise Development Plans, in accordance with guidance developed by MCSTOPPP. The SCP shall describe the site design, source control, and treatment control best management practices (BMPs) such as riparian buffer zones and designs for bioswales, that would be implemented at the site to minimize imperviousness, retain or detain stormwater, match pre-project peak flow rates, and reduce pollutants in runoff to the maximum extent practicable, for the design storms regulated by the Small MS4 Permit. The SCP shall evaluate the consistency of using riprap for creek outlet protection with the project's Stream Restoration Plan and evaluate whether using riprap would cause impacts greater than if natural restoration methods are used. If the use of riprap is found to be inconsistent with the Stream Restoration Plan, biotechnical measures shall be used in lieu of riprap for outlet projection. The SCP shall include an Operation and Maintenance Plan that identifies the individuals responsible for maintenance of treatment control BMPs.	<i>CDA and DPW</i>	<i>Prior to Precise Development Plan approval and during construction</i>	
<b>MM 4.b</b>	The applicant shall construct the project in a manner that avoids alteration to flow rates or changes in the direction of water movement, and that contributes to the long-term health and natural functions of the watershed. To implement this mitigation, the applicant shall submit a Creek Restoration Plan as part of their Precise Development Plan that includes hydrologic analysis confirming that the debris diversion berm removal and the installation of three in-creek check dams would not alter flow rates or water movement in a way that would undermine the bank stabilization efforts implemented to date by the RCD in Spirit Rock Creek in the areas where in-creek check dams are proposed.	<i>CDA</i>	<i>Prior to Precise Development Plan approval</i>	
<b>MM 4.c.1</b>	The project sponsor shall construct the project in a manner that avoids erosion and the discharge of sediment and/or pollutants into seasonal drainages located at the project site through implementation of a SWPPP. Prior to construction at the project site, consistent with the requirements of the Construction General Permit, and the County in its implementation of the Small MS4 Permit, the project sponsor shall prepare a SWPPP designed to reduce potential impacts to surface water quality through the project construction period and shall demonstrate that construction activity will be undertaken in a manner that uses	<i>DPW</i>	<i>Prior to and during construction</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p>effective best management practices (BMPs) to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges. The SWPPP shall be prepared by a qualified SWPPP developer. The SWPPP shall include, as applicable, all BMPs required in Construction General Permit Attachment D for Risk Level 2 dischargers or Construction General Permit Attachment E for Risk Level 3 dischargers (as appropriate based on final determination of the project's risk level status). The SWPPP shall include a construction site monitoring program that includes requirements for dry weather visual observations of pollutants at all discharge locations, and as appropriate (depending on the risk level), sampling of the site effluent or receiving waters (receiving water monitoring is only required for some Risk Level 3 dischargers). The project sponsor shall also prepare a Rain Event Action Plan as part of the SWPPP. BMP implementation shall be consistent with the BMP requirements in the California Stormwater Quality Association Stormwater Best Management Handbook-Construction (2003). Following are the types of BMPs that shall be implemented for the project, subject to review and approval by the County and the San Francisco Bay Regional Water Quality Control Board (RWQCB).</p> <p><u>Scheduling</u></p> <ul style="list-style-type: none"> <li>• To reduce the potential for erosion and sediment discharge, schedule activities to minimize ground disturbance during the rainy season. (Per Marin County Municipal Code Section 24.04.625, grading operations shall not be conducted during the rainy season (October 15 through April 15) without prior approval from the County.)</li> <li>• Sequence construction activities to minimize the amount of time that soils remain disturbed.</li> <li>• Stabilize all disturbed soils as soon as possible following the completion of ground disturbing work.</li> <li>• Install erosion and sediment control BMPs prior to the start of any ground-disturbing activities.</li> </ul>			

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	<p><u><i>Erosion and Sedimentation</i></u></p> <ul style="list-style-type: none"> <li>• Preserve existing vegetation in areas where no construction activity is planned or where construction activity will occur at a later date.</li> <li>• Stabilize and revegetate disturbed areas as soon as possible after construction with planting, seeding, and/or mulch (e.g., straw or hay, erosion control blankets, hydromulch, or other similar material) except in actively cultivated areas.</li> <li>• Install silt fences, coir rolls, and other suitable measures around the perimeter of the areas affected by construction and staging areas and around riparian buffers, storm drains, temporary stockpiles, spoil areas, stream channels, swales, down-slope of all exposed soil areas, and in other locations determined necessary to prevent off-site sedimentation.</li> <li>• Install temporary slope breakers during the rainy season on slopes greater than 5% where the base of the slope is less than 50 feet from a water body, wetland, or road crossing at spacing intervals required by the RWQCB.</li> <li>• Use filter fabric or other appropriate measures to prevent sediment from entering receiving waters.</li> <li>• Detain and treat stormwater using sedimentation basins, sediment traps, baker tanks, or other measures to ensure that discharges to receiving waters meet applicable water quality objectives.</li> <li>• Install check dams in channels and drainage ditches to reduce flow velocities and erosion, and to allow sediment to settle out of runoff.</li> <li>• Install outlet protection/energy dissipation, where applicable, to prevent scour of the soil caused by concentrated high velocity flows.</li> <li>• Implement control measures such as spraying water or other dust palliatives to</li> </ul>			

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p>alleviate nuisance caused by dust.</p> <p><u>Groundwater/Dewatering</u></p> <ul style="list-style-type: none"> <li>• Prepare a dewatering plan prior to excavation specifying methods of water collection, transport, treatment, and discharge of water generated by construction site dewatering.</li> <li>• Impound water generated by dewatering in sediment retention basins or other holding facilities to settle the solids and provide other treatment as necessary prior to discharge to receiving waters. Locate sedimentation basins and other retention and treatment facilities away from waterways to prevent sediment-laden water from reaching creeks.</li> <li>• Control discharges of water produced by dewatering to prevent erosion.</li> </ul> <p><u>Tracking Controls</u></p> <ul style="list-style-type: none"> <li>• Grade and stabilize construction site entrances and exits to prevent runoff from the site and to prevent erosion.</li> <li>• Install a tire washing facility at the site access to allow for tire washing when vehicles exit the site to prevent offsite tracking of sediment.</li> <li>• Remove any soil or sediment tracked onto paved roads during construction by street sweeping.</li> </ul> <p><u>Non-stormwater Controls</u></p> <ul style="list-style-type: none"> <li>• Place drip pans under construction vehicles and all parked equipment.</li> <li>• Check construction equipment regularly for leaks.</li> </ul>			

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<ul style="list-style-type: none"> <li>• Wash construction equipment regularly in a designated enclosed area.</li> <li>• Contain vehicle and equipment wash water for percolation or evaporative drying away from the stormwater drainage system and creeks.</li> <li>• Refuel vehicles and equipment away from the stormwater drainage system and creeks, contain the area to prevent run-on and run-off, and promptly clean up spills.</li> <li>• Cover all storm drain inlets when paving or applying seals or similar materials to prevent the discharge of these materials.</li> </ul> <p><u><i>Waste Management and Hazardous Materials Pollution Control</i></u></p> <ul style="list-style-type: none"> <li>• Remove trash and construction debris from the project area daily.</li> <li>• Locate sanitary facilities a minimum of 300 feet from creeks. Maintain sanitary facilities regularly.</li> <li>• Store all hazardous materials in an area protected from rainfall and stormwater run-on and prevent the off-site discharge of hazardous materials.</li> <li>• Minimize the potential for contamination of receiving waters by maintaining spill containment and cleanup equipment on site, and by properly labeling and disposing of hazardous wastes.</li> <li>• Locate waste collection areas close to construction entrances and away from roadways, the stormwater drainage system, and creeks.</li> <li>• Inspect dumpsters and other waste and debris containers regularly for leaks and remove and properly dispose of any hazardous materials and liquid wastes placed in these containers.</li> <li>• Train construction personnel in proper material delivery, handling, storage,</li> </ul>			

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p>cleanup, and disposal procedures.</p> <ul style="list-style-type: none"> <li>• Implement construction materials management BMPs for:               <ul style="list-style-type: none"> <li>– Road paving, surfacing and asphalt removal activities.</li> <li>– Handling and disposal of concrete and cement.</li> </ul> </li> </ul> <p><i><u>BMP Inspection, Maintenance, and Repair</u></i></p> <ul style="list-style-type: none"> <li>• Inspect all BMPs on a regular basis to confirm proper installation and function. Inspect BMPs daily during storms.</li> <li>• Immediately repair or replace BMPs that have failed. Provide sufficient devices and materials (e.g., silt fence, coir rolls, erosion blankets, etc.) throughout project construction to enable immediate corrective action for compromised BMPs.</li> </ul> <p><i><u>Monitoring and Reporting</u></i></p> <ul style="list-style-type: none"> <li>• Provide the required documentation for SWPPP inspections, maintenance, and repair requirements. Personnel that will perform monitoring and inspection activities shall be identified in the SWPPP.</li> <li>• Maintain written records of inspections, spills, BMP-related maintenance activities, corrective actions, and visual observations of off-site discharges of sediment or other pollutants, as required by the RWQCB.</li> <li>• Monitor the water quality of discharges from the site to assess the effectiveness of BMPs.</li> </ul> <p><i><u>Post-construction BMPs</u></i></p> <ul style="list-style-type: none"> <li>• Revegetate all temporarily disturbed areas as required after construction</li> </ul>			

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<p>activities are completed.</p> <ul style="list-style-type: none"> <li>• Remove any remaining construction debris and trash from the site upon project completion.</li> <li>• Phase the removal of temporary BMPs as necessary to ensure stabilization of the site.</li> <li>• Maintain post-construction site conditions to avoid formation of unintended drainage channels, erosion, or areas of sedimentation.</li> </ul> <p><u>Training</u></p> <ul style="list-style-type: none"> <li>• Train construction site personnel on components of the SWPPP and BMP implementation. Train all personnel that will perform inspection and monitoring activities.</li> </ul>			
<b>MM 4.e.1</b>	<p>The applicant shall design the interceptor drains associated with the wastewater treatment system to avoid discharge as surface water runoff that could result in localized flooding and erosion. This mitigation measure shall be implemented by preparation of detailed system design plans which shall be submitted with the Precise Development Plan application that demonstrates that groundwater from the interceptor drains will not discharge as surface runoff. To the extent that the project design includes surface runoff, conveyance of the runoff shall be incorporated into the SCP to ensure that the surface runoff does not cause localized flooding or erosion.</p>	<i>CDA, DPW and RWQCB</i>	<i>Prior to Precise Development Plan approval</i>	
<b>MM 4.e.2</b>	<p>The applicant shall construct the project in a manner that contributes to the long-term health and natural functions of the watershed. To implement this mitigation, the applicant shall submit a Creek Restoration Plan as part of their Precise Development Plan that includes hydrologic analysis confirming that the debris diversion berm removal and the installation of three in-creek check dams would not alter flow rates or water movement in a way that would undermine the bank stabilization efforts implemented to date by the</p>	<i>CDA</i>	<i>Prior to Precise Development Plan approval</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	RCD in Spirit Rock Creek in the areas where in-creek check dams are proposed.			
<b>5. Air Quality</b>				
<b>MM.5.e</b>	The applicant shall construct the project in a manner that avoids emission of fugitive dust by employing dust control measures (e.g. watering of active grading areas and preventing vehicles from tracking dirt onto public roads) to reduce potentially significant construction related impacts on air quality to a less than significant level. In conjunction with their Precise Development Plan application, the applicant shall submit a dust control plan for approval by the County that specifies dust control measure that would be employed during grading and construction activities and that would be regulated by the Department of Public Works through Grading Permits and Building Permits.	DPW	<i>Prior approval of the Precise Development Plan, and prior to and during construction</i>	
<b>XV. Transportation/Circulation</b>				
<b>MM.6.a</b>	<p>The project sponsor shall operate the project site in a manner that will avoid traffic conflicts, preserves emergency vehicle access, and maintain intersection levels of service at or better than the County's level of service "D" threshold. This mitigation measure shall be implemented by submitting a Transportation Management Plan (TMP) demonstrating compliance with the above operational objectives. The TMP shall employ a combination of visitor information, directional signs and wayfinding information, to alert guest to circulation issues associated with daily operations. The TMP shall also include Special Event Provisions to govern traffic and circulation operations during larger classes and events. Before increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons, the project sponsor shall submit a Transportation Management Plan (TMP) for approval by the County that either demonstrates that the following improvements and programs have been implemented, or establishes provisions for their implementation:</p> <ul style="list-style-type: none"> <li>a. The TMP shall include circulation information and direction to assist visitors to the project site. At a minimum circulation information shall include: <ul style="list-style-type: none"> <li>1. A NO U TURN sign should be installed on westbound Sir Francis Drake at</li> </ul> </li> </ul>	DPW	<i>Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to Precise Development Plan Approval</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<p>Railroad Avenue to further discourage motorists from making U-turns and instead to use the “advised exit route” from Spirit Rock to eastbound Sir Francis Drake;</p> <ol style="list-style-type: none"> <li>2. Provide information to guests and visitors to alert them of the “advised exit route” (i.e., right-turn from Spirit Rock driveway onto westbound Sir Francis Drake Boulevard, left-turn from Sir Francis Drake Boulevard to Railroad Avenue, left-turn from Railroad Avenue to San Geronimo Valley Drive, and right-turn from San Geronimo Valley Drive to eastbound Sir Francis Drake Boulevard);</li> <li>3. Incorporate improved wayfinding signage along Railroad Avenue and San Geronimo Valley Drive to clearly designate the advised route and to reduce potential confusion and wrong turns on Woodacre Streets by Spirit Rock drivers;</li> </ol> <p><b>b.</b> The TMP will establish traffic reduction measures to encourage or require car pooling and use of transit by providing financial incentives to use other than single-occupant vehicles to get access to the project site;</p> <p><b>c.</b> The TMP will include a Special Events Management Program (SEMP) that includes the following for larger classes and special events:</p> <ol style="list-style-type: none"> <li>1. identify traffic control measures (e.g. cones, directional signs, parking attendants, flag people, etc.) as needed to assist with safe circulation on the project site and in the project vicinity;</li> <li>2. The SEMP will establish provisions for providing notification of larger classes and special events to service providers, transportation providers, the community, and the County for all special and largely attended events. A master schedule of all site events shall be posted prominently on-line at least four weeks before all scheduled events;</li> <li>3. The SEMP will establish scheduling measures to avoid traffic conflicts during periods of high traffic volume in the project vicinity and to “meter” in-bound</li> </ol>			

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p>and out-bound traffic, if necessary, to preserve LOS D operations.</p> <ul style="list-style-type: none"> <li>d. The TMP will establish enforcement provisions that may include immediate cessation of activities, reductions in daily and special event populations, and financial penalties for any violation of the TMP;</li> <li>e. The TMP shall establish monitoring and reporting protocol to document compliance with the TMP, report monitoring results and identify contingency measures that were required in order to adhere to performance criteria; and</li> <li>f. The TMP will be prepared to County standards and specifications and shall include funding provisions to either defray County costs associated with peer review of a TMP prepared by the applicant, or to pay for County preparation of the TMP. The TMP shall also include a funding mechanism to allow for County monitoring of TMP compliance.</li> </ul>			
<b>MM.6.c</b>	<p>The project sponsor shall operate the site to ensure emergency vehicle access and to prevent overflow parking on surrounding streets. This mitigation shall be implemented by submitting a Special Events Management Program (SEMP) for review and approval by the County prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons. The SEMP shall establish provisions for coordinating special events with emergency service providers to ensure safe circulation and emergency vehicle access throughout the events. The SEMP may include the following:</p> <ol style="list-style-type: none"> <li>1. Provisions that include notification to emergency service providers of large events that have the potential to generate an on-site population of more than 500 people,</li> <li>2. Circulation controls, (e.g., parking attendants, installation of temporary directional signs and pylons, etc.) to preserve emergency vehicle access at the project site;</li> </ol>	Marin County Fire Department	<i>Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to Precise Development Plan Approval</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<p>3. On site police and fire control arrangements and communication systems;</p> <p>4. Provisions for standby or alternate personnel, equipment and or facilities in the event that attendance exceeds pre-event estimates; and</p> <p>5. Provisions for emergency medical and first aid services.</p>			
<b>MM.6.d</b>	<p>The project sponsor shall operate special events to avoid overflow parking outside of approved parking areas for special events. This mitigation measure will be implemented by submitting a Special Events Management Program (SEMP) in conjunction with the Precise Development Plan application for review and approval by the County. The SEMP shall include provisions to govern all activities that could result in an on-site population of more than 560 people. The TMP should include program descriptions (e.g., carpool matching program, public transportation, private shuttle services, a reservation system, communication plans), incentives (e.g., fees and discounts to encourage carpooling, bus use, bicycling and walking), and metrics (e.g., mode targets, level of service at key intersections during open house or special events, parking limits).</p> <p>The TMP should include notification requirements that provide the County with annual updates of all scheduled or anticipated large classes and special events, the estimated attendance, and traffic and parking management plans, including emergency access provisions that will be employed during the events.</p> <p>The Transportation Management Plan should also include details on how necessary services will be funded, how adherence to the vehicle limitations will be enforced, and shall include penalties for non-adherence to plan goals and metrics.</p>	<i>CDA and DPW</i>	<i>Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to Precise Development Plan Approval</i>	
<b>MM.6.e</b>	<p>The project sponsor shall install necessary roadway improvements to ensure safe access to the project site. This mitigation measure will be implemented by submitting improvement plans for approval by the County that have been designed to accommodate daily and special event populations and that include installation of an appropriately designed deceleration lane (estimated to be 530 feet in length) to the satisfaction of the Public Works Department in order to accommodate westbound traffic turning movements into the project site.</p>	<i>DPW</i>	<i>Prior to hosting special events that exceed the 1988 operating limits</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
<b>7. Biological Resources</b>				
<b>MM 7.b.1</b>	<p>The project sponsor shall restore native grasslands that are disturbed by project construction where the native grasslands comprise more than 10% of the groundcover. To implement this mitigation, the applicant shall submit a resource enhancement plan in conjunction with their Precise Development Plan application that includes a native grassland restoration component. The grassland restoration component shall ensure the restoration of native grassland communities that are disturbed or displaced by construction. The restoration shall be planned and carried out by qualified biologists and restoration specialists. The area to be restored will be equal or greater than disturbed native grassland. The restoration plan shall include a monitoring component and shall demonstrate that native grasslands are restored and replaced to meet the following:</p> <ul style="list-style-type: none"> <li>• Density of native grasses is at least 80% of native grass density in pre-disturbance conditions;</li> <li>• Native species richness is at least 80% of native richness in pre-disturbance conditions; and</li> <li>• No new invasive nonnative species are established in the restored area.</li> </ul>	CDA	<i>Prior to approval of the Precise Development Plan, and during and after construction</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
<b>MM 7.b.2</b>	<p>The project sponsor shall submit a construction management and revegetation plan in conjunction with their Precise Development Plan application that includes the following provisions to govern construction activity for the relocated residences and Dining Hall in the retreat area adjacent to riparian/bay woodlands consistent with the SCA policies contained in the CWP:</p> <ul style="list-style-type: none"> <li>• Vegetation removal will be minimized to the maximum extent practicable during all work activities. Grading limits will be clearly flagged to minimize disturbance from construction equipment.</li> <li>• Native trees greater than 12 inches diameter at breast height that are removed as a result of construction activities will be replaced at a minimum 3:1 ratio with equivalent native species. Native trees less than 12 inches diameter at breast height will be replaced at a 1:1 ratio. All propagules used for native plantings will be obtained from local nursery stock, if available. The applicant shall provide a revegetation plan that identifies the location and container size of all replacement trees for review and approval by the County. The revegetation plan shall incorporate BMPs to prevent transmission of Sudden Oak Death.</li> <li>• All disturbed areas will be revegetated with native plantings and/or a native seed mix as soon as practicable to minimize erosion and recruitment of invasive non-native plant species. Best management practices that avoid dispersal of invasive nonnative plants will be used, including using only certified, weed-free materials dominated by native species for erosion control and revegetation.</li> <li>• Temporary exclusionary fencing (e.g., silt fence – a piece of synthetic filter fabric, also called a geotextile) will be installed along the periphery of the work areas, including around all riparian areas. This temporary fencing will prevent debris and sediment from entering adjacent habitats during building removal and construction.</li> <li>• See <b>MM 7.b.9</b> for additional mitigation measures.</li> </ul>	CDA	<i>Prior to approval of the Precise Development Plan, and during and after construction</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
<b>MM 7.b.3</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that minimizes disturbance of wetland resources and ensure that impacted wetland areas are replaced at a 2:1 ratio. To implement this mitigation measure, the applicant shall submit a resource enhancement plan at the time they file the Precise Development Plan that includes the following wetland restoration and replacement measures for construction activity consistent with the WCA policies contained in the CWP.</p> <ul style="list-style-type: none"> <li>• Prior to construction, the project sponsor shall obtain appropriate County, state and federal permits for impacts to wetlands and/or other waters of the U.S. This will include, but is not limited to, obtaining permits from the County, U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, and/or California Department of Fish and Game. The conditions of these agreements shall serve as additional provisions.</li> <li>• The project sponsor shall compensate for the loss of the jurisdictional wetland at a ratio of 2:1 (or as agreed upon by the permitting agencies) within the project area. The restoration effort shall include constructing a man-made mitigation wetland in the horse pasture adjacent to Sir Francis Drake Boulevard and wetland plant revegetation. The newly constructed wetland shall be 0.4 acres, a 2:1 impact ratio. It shall be buffered from equestrian activity and development by a 25-foot upland buffer planted with native grass and shrub species, or by other appropriate landscaping or agricultural fencing to protect the wetland area in compliance with the WCA policies of the CWP. It shall require implementation of a 5-year monitoring program with applicable performance standards, including but not limited to, establishing 80% survival rate of restoration plantings, absence of invasive plant species, absence of erosion features, and presence of a functioning, self-sustainable wetland system.</li> </ul>	CDA	<i>Prior to, during, and after construction</i>	
<b>MM 7.b.5</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that avoids bat roosting habitat. To implement this mitigation measure, the applicant shall, at the time of Precise Development Plan application, submit a resource enhancement plan that includes the following species protection measures for site construction activity:</p>	CDA	<i>Prior to Precise Development Plan Approval, and prior to and during construction</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<ul style="list-style-type: none"> <li>• Prior to commencing work, a qualified biologist will survey the site for bat roosts. If occupied roosting habitat is identified, removal of roost trees would not be allowed until the roost is unoccupied.</li> <li>• All construction crew members will be trained by a qualified biologist on the status, life history characteristics, and avoidance measures for bats.</li> <li>• Construction will be limited to daylight hours to avoid interference with the foraging abilities of bats.</li> </ul>			
<b>MM 7.b.6</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that avoids bird nesting habitat. To implement this mitigation measure, the applicant shall, at the time of Precise Development Plan application, submit a resource enhancement plan that includes the following species protection measures for site construction activity:</p> <ul style="list-style-type: none"> <li>• Construction activities should occur outside of the critical breeding period (mid March through mid August). If activities must occur during the normal breeding season, work areas will be surveyed by a qualified biologist prior to commencing.</li> <li>• If active nests or behavior indicative of nesting are encountered, those areas plus a 50-foot buffer for small songbirds and 250-foot buffer for larger birds (e.g., owls, raptors) designated by the biologist will be avoided until the nests have been vacated.</li> <li>• Ongoing construction monitoring will occur to ensure no nesting activity is disturbed.</li> <li>• If state and/or federally listed birds are found breeding within the project area, activities will be halted and consultation with the California Department of Fish and Game and U.S. Fish and Wildlife Service will occur; the conditions of these agreements will serve as additional provisions.</li> </ul>	CDA	<i>Prior to Precise Development Plan approval, and prior to and during construction</i>	
<b>MM 7.b.7</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that avoids special status reptile and amphibian habitat. To implement this mitigation measure, the applicant</p>	CDA	<i>Prior to Precise</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<p>shall, at the time of Precise Development Plan application, submit a resource enhancement plan that includes the following species protection measures for site construction activity:</p> <ul style="list-style-type: none"> <li>• A preconstruction survey for special-status western pond turtle, California red-legged frog, and foothill yellow-legged frog will occur prior to beginning work within 100 feet of streams and wetlands, and work will only occur in areas that have been surveyed and have either been found to contain no special status reptile and amphibian species, or have been adequately protected from construction activity by fencing and/or other barriers that protect the habitat as directed by a qualified biologist.</li> <li>• All construction crews will be trained by a qualified biologist on the status, life history characteristics, and avoidance measures for special-status and common reptile and amphibian species.</li> <li>• Temporary wildlife exclusionary fencing (e.g., silt fence – a piece of synthetic filter fabric, also called a geotextile) will be installed along the periphery of the work areas, including around all wetlands and riparian areas. This temporary fencing will preclude animals from entering the work site and prevent construction debris from entering adjacent aquatic habitats.</li> </ul>		<p><i>Development Plan approval and prior to and during construction</i></p>	
<b>MM 7.b.8</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that avoids common terrestrial species habitat. To implement this mitigation measure, the applicant shall, at the time of Precise Development Plan application, submit a resource enhancement plan that includes the following species protection measures for site construction activity:</p> <ul style="list-style-type: none"> <li>• A preconstruction survey (on the day preceding work and/or ahead of the construction crew) will be performed prior to any major site disturbance, such as grading. Where terrestrial species are observed within the project area or immediate surroundings, these areas will be avoided until the animal(s) has (have) vacated the area, and/or the animal(s) will be relocated out of the project area by a qualified biologist.</li> </ul>	CDA	<p><i>Prior to Precise Development Plan approval and prior to and during construction</i></p>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<ul style="list-style-type: none"> <li>The site will be surveyed periodically during construction to ensure that no terrestrial species are being impacted by construction activities.</li> </ul>			
<b>MM 7.b.9</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that avoids aquatic habitat and species. To implement this mitigation measure, the applicant shall, at the time of Precise Development Plan application, submit a resource enhancement plan that includes the following species protection measures for site construction activity:</p> <ul style="list-style-type: none"> <li>Work will be performed in isolation of any flowing water.</li> <li>Erosion control measures will be utilized throughout all phases of construction where sediment runoff from exposed slopes threatens to enter the water. At no time will silt laden runoff be allowed to enter stream channels or wetlands or be directed to where it may enter these habitats.</li> <li>Excavated material will be disposed of properly with erosion control measures in place.</li> <li>Throughout construction, a qualified biologist will monitor to ensure water quality standards are being met and sediment is not entering the watercourse.</li> <li>A preconstruction training session will be provided for construction crew members by the qualified biologist. The training will include a discussion of the sensitive biological resources within the project area and potential impacts of accidental sediment releases. This will include a discussion of species habitat, protection measures to ensure species are not impacted by project activities, and project boundaries.</li> <li>New development will be designed, constructed, and maintained to result in no increase in runoff to adjacent aquatic habitats. Low Impact Development (LID) techniques, including pervious pavements and path surfaces, and bioswales will be used to interrupt the flow of water and allow it to percolate into the soil.</li> <li>Additional water withdrawals will be minimized through development of alternative</li> </ul>	CDA	<i>Prior to Precise Development Plan approval and prior to and during construction</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	water sources.			
<b>MM 7.c.1</b>	<p>The project sponsor shall ensure that the project is constructed in a manner that avoids introducing or facilitating the spread of invasive plant species. To implement this mitigation measure, the applicant shall, at the time of Precise Development Plan application, submit a resource enhancement plan that includes the following provisions to avoid introduction of nonnative species to the site:</p> <ul style="list-style-type: none"> <li>• Any seed, straw, or mulch brought into the site will be free of nonnative invasive species.</li> <li>• Construction vehicles and other landscaping equipment will be cleaned of seed and soil from other sites before entering new areas.</li> <li>• Revegetation of disturbed soil will occur promptly after disturbance.</li> </ul> <p>Restoration activities for wetland mitigation and native bunchgrass mitigation will entail soil disturbance. BMPs will be carefully followed at all times. Both restoration sites and donor sites will be monitored post-installation for any increases in invasive nonnative species; see Impact B1. A plan will be developed for control of any invasive species detected in these areas.</p>	CDA	<i>Prior to Precise Development Plan approval, and prior to and during construction</i>	
<b>11. Public Service</b>				
<b>MM 11.a.1</b>	<p>The project plans shall demonstrate conformance with emergency vehicle access and fire suppression standards, defensible space, and landscape management requirements established by applicable codes. This mitigation measure will be implemented by submitting a Precise Development Plan application for approval by the County that incorporates a detailed landscaping and vegetation management plan and identifies the locations of emergency access and utility access. To further reduce potential fire hazards, the project plans shall demonstrate to the greatest extent possible the use of fire-resistive construction techniques, automatic fire sprinklers, automatic fire alarm systems, and other applicable life safety systems. The project plans shall be reviewed and approved by the Marin County Fire Department. If the vegetation management plan involves removal of grasslands, the plan shall also be reviewed by a qualified biologist</p>	<i>Marin County Fire Department</i>	<i>Prior to approval of Precise Development Plans</i>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	and, if warranted, the Department of Fish and Game.			
<b>MM 11.a.2</b>	The project shall be maintained in a manner that preserves vegetative clearing and acceptable landscaping to comply with County landscaping and defensible space requirements. This mitigation measure shall be implemented by submitting a Precise Development Plan application for approval by the County that incorporates a vegetation management plan that demonstrates compliance with adopted County landscape and defensible space standards, and includes provisions for the maintenance of defensible space.	<i>Marin County Fire Department</i>	<i>Prior to approval of Precise Development Plan, on-going</i>	
<b>MM 11.a.3</b>	The project shall construct the project in a manner that ensures adequate emergency vehicle access and fire suppression facilities. This mitigation measure shall be implemented by submitting a Precise Development Plan application for approval by the County that demonstrate conformance with emergency vehicle access and fire suppression standards.	<i>Marin County Fire Department</i>	<i>Prior to approval of Precise Development Plans</i>	
<b>MM 11.a.4</b>	The applicant shall host special events in a manner that avoids activities that create the risk of fire, and to ensure that emergency personnel are able to respond to calls for service at the site. This mitigation measure shall be implemented prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons by submitting a Special Events Management Program (SEMP) for approval by the County that will ensure adequate notification and coordination with the Fire Department to ensure staffing and equipment are available for events that include any of the following: <ul style="list-style-type: none"> <li>a. Total daily attendance by more than 500 people;</li> <li>b. Outdoor cooking or open flames; and/or</li> <li>c. Attendance or activities that generate demand for overflow parking in excess of the 321 spaces available on site.</li> </ul>	<i>Marin County Fire Department</i>	<i>Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to approval of Precise Development Plan application.</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p>The SEMP may include the following:</p> <ul style="list-style-type: none"> <li>• Provisions that include notification to emergency service providers of large events that have the potential to generate an on-site population of more than 500 people,</li> <li>• Circulation controls, (e.g., parking attendants, installation of temporary directional signs and pylons, etc.) to preserve emergency vehicle access at the project site;</li> <li>• On site police and fire control arrangements and communication systems;</li> <li>• Provisions for standby or alternate personnel, equipment and or facilities in the event that attendance exceeds pre-event estimates; and</li> <li>• Provisions for emergency medical and first aid services.</li> </ul>			
<b>MM 11.b.1</b>	<p>The applicant shall host special events in a manner that avoids activities that create the risk that law enforcement officers are able to respond to calls for service at the site. This mitigation measure shall be implemented prior to increasing daily occupancy to more than 315 persons, or peak occupancy for open house/events to more than 150 persons by submitting a Special Events Management Program (SEMP) that will ensure adequate notification and coordination with the Sherriff Department to establish necessary arrangements, including funding, to ensure that staffing and equipment are available for events that include total daily attendance of more than 500 people.</p>	Marin County Sherriff Department	Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to approval of Precise Development Plans	
<b>12. Utilities and Service Systems</b>				
<b>MM.12.c.1</b>	<p>The project sponsor shall operate the property in a manner that does not result in water use that exceeds the available supply limits for the site (presently 7.49 acre-feet of water in a year). This mitigation measure shall be implemented by submitting a Water Management Plan, as part of the Resource Protection Plan, to demonstrate that the daily operations would not result in use of more than 7.49 acre-feet of water in a year by providing necessary documentation prior to increasing daily occupancy to more</p>	CDA and MMWD	Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<p>than 315 persons, or peak occupancy for open house/events to more than 150 persons to comply with the following:</p> <ol style="list-style-type: none"> <li>1. The project sponsor shall submit a Water Management Plan, as part of the Resource Protection Plan to demonstrate that use of the project site would not result in the use of more water than is allocated under the water service agreement with MMWD (presently 7.49 acre-feet of water in a year). As an alternative, the project sponsor may enter into an expanded water service agreement with MMWD to secure an additional allocation for the project site to serve total projected projected demand. The Water Demand Management Plan shall demonstrate that water savings from conservation, recycling, and reuse of water at the project site is adequate to offset increases in demand that are expected to result from increased activity at the site, and shall include the following:               <ol style="list-style-type: none"> <li>a. Demonstrates that activity at the site will not generate demand for domestic water from MMWD in excess the supply that has been allocated to the property (presently 7.49 acre-feet per year);</li> <li>b. Establishes monitoring equipment and practices to track water consumption to ensure compliance with performance objectives;</li> <li>c. Establishes contingency plans that describe specific actions that shall be taken to prevent consumption of more than the allocated supply. Contingency plans may include reduction or cessation of classes, events, activities, and maintenance practices, and the elimination of overnight visitation;</li> <li>d. Enforcement provisions that may include reductions in daily and special event population, cancellation of future events, remediation measures, and financial penalties for any violation of the WMP;</li> <li>e. Includes contingency plans that describe specific actions that shall be taken to prevent water consumption in excess of the approved</li> </ol> </li> </ol>		construction	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p>allocation; and</p> <p>f. Identify reporting commitments to document the monitoring results and identify contingency measures that were required in order to adhere to supply limitations.</p> <p>2. Enter into a Watershed Protection Agreement with the Marin Municipal Water District to ensure sound stewardship of Spirit Rock land and water resources.</p>			
<b>MM12.d.1</b>	<p>The applicant shall conduct activities at the project site in a manner that ensures demand for sewage disposal does not exceed system capacity or violate the Waste Discharge Requirements. The applicant shall implement this mitigation measure by submitting a Waste Water Management Program (WWMP), as part of the Resource Protection Plan for the project site, in conjunction with their Precise Development Plan application. The WWMP shall establish Special Events Management Program (SEMP) for larger classes and events that have the potential, in combination with other activities at the project site, to exceed available sewage disposal capacity (e.g., populations in excess of 791 people). The County, in consultation with the RWQCB, will review the WWMP to ensure it contains the following measures:</p> <p>a. Demonstrates that activity at the site will not generate wastewater in excess of 11,400 gallons per day. This may require metering of the wastewater flows to provide early warning that use is nearing system capacity;</p> <p>b. Incorporates operational practices, such as recycling greywater, actively managing restroom use, and implementing water conservation practices;</p> <p>c. Provides for monitoring of the wastewater system to ensure compliance with performance objectives;</p> <p>d. Establishes contingency plans that describe specific actions that shall be taken to prevent peak flows in excess of system capacity. Contingency plans may include immediate cessation of activities, closure of restrooms, and/or partial or total</p>	CDA Environmental Health Department and RWQCB	Prior to increasing daily peak occupancy to more than 315 persons or peak open house/event capacity to more than 150 persons, and prior to construction	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<p>evacuation of the site;</p> <p>e. To the extent that compliance with wastewater discharge limitation can only be accomplished with temporary facilities (e.g., temporary bathrooms and hand-washing facilities, temporary storage, pumping and removal of wastewater for treatment at a municipal facility) that are not connected to the wastewater disposal system, the WWMP shall include a plan indicating the location and number of such facilities that will be installed at the site and provide appropriate assurances that the temporary facilities will be removed;</p> <p>f. Enforcement provisions that may include reductions in daily and special event population, cancellation of future events, remediation measures, and financial penalties for any violation of the WWMP or WDRs; and</p> <p>g. Reporting to document the monitoring results and identify contingency measures that were required in order to adhere to design capacity limitations.</p>			
<b>14. Cultural Resources</b>				
<b>MM14.a.1</b>	<p>The applicant shall undertake construction in a manner that avoids historic and prehistoric resources. Before beginning construction, the project sponsor shall submit plans for approval by the County that include notes informing their grading contractor(s) of the potential for encountering paleontological sites by including the following directive in contract documents:</p> <p><i>“The subsurface of the construction site may be sensitive for paleontological resources. If paleontological resources are encountered during project subsurface construction, all ground-disturbing activities within 50 feet shall be redirected and a qualified paleontologist contacted to assess the situation, consult with agencies as appropriate, and make recommendations for the treatment of the discovery. Project personnel shall not collect or move any paleontological materials. Paleontological resources include fossil plants and animals, and such trace fossil evidence of past life as tracks. Ancient marine sediments may</i></p>	CDA	<i>Prior to project ground-disturbing activities</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
	<p><i>contain invertebrate fossils such as snails, clam and oyster shells, sponges, and protozoa, and vertebrate fossils such as fish, whale, and sea lion bones. Vertebrate land mammals may include bones of mammoth, camel, saber-tooth cat, horse, and bison. Paleontological resources also include plant imprints, petrified wood, and animal tracks".</i></p> <p>The Marin County Community Development Agency shall verify that the language has been included in the contract documents before issuing the required permits.</p> <p>Adverse effects to paleontological deposits should be avoided by project activities. If avoidance is not feasible, the paleontological resources shall be evaluated for their significance by a paleontologist. If the resources are not significant, avoidance is not necessary. If the resources are significant, the adverse effects of project ground disturbance shall be mitigated. A paleontologist shall prepare a Paleontological Mitigation Plan for submittal to the Marin County Community Development Agency for review, comment, and approval. Upon approval of the Paleontological Mitigation Plan, the Marin County Community Development Agency shall be responsible for ensuring that the stipulations of the Mitigation Plan are fulfilled.</p>			
<p><b>MM 14.b.1</b></p>	<p>The applicant shall undertake construction in a manner that avoids historic and prehistoric resources. Before beginning construction within the Teacher and Staff Village subarea and of the proposed Meeting Hall, the applicant shall establish, and secure County approval of, a 50-foot exclusionary buffer with high visibility temporary construction fencing at P-21-000485/CA-MRN-554 and P-21-002634. No project activities, including equipment staging or other ground-disturbing activities, shall occur within the exclusionary buffer.</p> <p>The construction contractor shall be responsible for installing and maintaining the temporary fences, and installation will be done in coordination with a qualified archaeologist and a FIGR representative. The 50-foot exclusionary buffer shall be determined by a field review, which may include presence/absence auger testing or shovel test pits, as needed, to determine the resources' boundaries. Staff from the Marin County Community Development Agency shall conduct site visits prior to construction, and periodically thereafter during the course of construction, to verify that the exclusionary</p>	<p>CDA</p>	<p><i>Fencing shall be erected prior to project activities and monitored periodically for the duration of project activities within the Teacher and Staff Village subarea and proposed Meeting Hall site.</i></p>	

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<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	fences have been installed, are properly maintained, and that no project activities are occurring within the exclusionary fence perimeter.			
<b>MM 14.b.2</b>	<p>The applicant shall undertake construction in a manner that avoids historic and prehistoric resources. Before beginning construction, the applicant shall retain a qualified archaeologist and a FIGR representative to monitor project ground-disturbing activities associated with construction at the Teacher and Staff Village subarea and of the Meeting Hall. Archaeological and Native American monitors shall be empowered to halt construction activities at the location of a discovery to review possible archaeological material and to protect the resource while the finds are being evaluated.</p> <p>If deposits of prehistoric or historical archaeological materials are encountered during project activities, all work within 50 feet of the discovery shall be redirected until the archaeologist assesses the finds, consults with agencies as appropriate, and makes recommendations for the treatment of the discovery. Adverse effects to such deposits shall be avoided by project activities. If avoidance is not feasible, the archaeological deposits shall be evaluated for their eligibility for listing in the California Register of Historical Resources. If the deposits are not eligible, avoidance is not necessary. If the deposits are eligible, adverse effects on the deposits shall be mitigated.</p> <p>If mitigation is determined necessary by the archaeologist, mitigation procedures shall be developed by the archaeologist and in coordination with the Marin County Community Development Agency. Mitigation may include excavation of the archaeological deposit in accordance with a data recovery plan (see CCR Section 15126.4(b)(3)(C)) and standard archaeological field methods and procedures; laboratory and technical analyses of recovered archaeological materials; preparation of a report detailing the methods, findings, and significance of the archaeological site and associated materials; and accessioning of archaeological materials and a technical data recovery report at a curation facility.</p> <p>Upon completion of the archaeological monitoring, the archaeologist shall prepare a report of methods and findings for submittal to the Marin County Community Development Agency and the Northwest Information Center at Sonoma State University.</p>	CDA	<i>Archaeological and FIGR monitors shall be retained prior to project ground-disturbing activities. Monitoring will occur during project ground-disturbing activities at those areas identified above.</i>	

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Proposed Mitigation	Summary of Measure	Monitoring Responsibility	Timing/Implementation	Verification (Date and Initials)
<p><b>MM 14.b.3</b></p>	<p>The applicant shall undertake construction in a manner that avoids historic and prehistoric resources. Before beginning construction, the project sponsor shall submit plans for approval by the County that include notes informing contractors that if human remains are encountered, these remains shall be treated in accordance with HSC Section 7050.5. The project applicant shall inform its contractor(s) of the cultural sensitivity of the project area for human remains by including the following directive in contract documents:</p> <p><i>If human remains are encountered during project activities, work within 50 feet of the discovery shall be redirected and the County Coroner notified immediately. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the Coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Most Likely Descendant (MLD) to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.</i></p> <p>The Marin County Community Development Agency shall verify that the language has been included in the contract documents before issuing the required permits.</p> <p>Upon completion of the assessment, the archaeologist shall prepare a report documenting the methods and results, and provide recommendations for the treatment of the human remains and any associated cultural materials, as appropriate and in coordination with the recommendations of the MLD. The report shall be submitted to the Marin County Community Development Agency and the Northwest Information Center.</p>	<p>CDA</p>	<p><i>The italicized language shall be included in appropriate contract documents executed prior to project ground-disturbing activities.</i></p>	

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<b>1988 Mitigation Measures</b>				
<b>Proposed Mitigation</b>	<b>Summary of Measure</b>	<b>Monitoring Responsibility</b>	<b>Timing/Implementation</b>	<b>Verification (Date and Initials)</b>
	<b>GEOPHYSICAL FACTORS</b>			
1	Require the submission of a detailed soils report for each of the buildings in the retreat center as part of the precise development plan application.	CDA	<i>Prior to Precise Development Plan approval</i>	Completed as the result of the Master Plan Amendment pursuant to compliance with the California Building Code (CBC)
	<b>BIOLOGY</b>			
1	Mitigate the tree removal by a tree replacement program that provides three new trees for every one removed.	CDA	<i>Prior to building occupancy</i>	Superseded by MM.1.a.2 & MM.7.b.2
2	Mitigate the potential impacts of development in proximity to the stream by planting riparian vegetation and woodland species along the stream channel south of the main parking lot.	CDA	<i>Prior to building occupancy</i>	Superseded by MM7.b.7 & MM7.b.9
3	Agricultural easements over upland areas plus meadow area near Sir Francis Drake Boulevard should be used to ensure continued agricultural use of the most agricultural acreage on the property.	CDA	<i>Prior to issuance of a building permit</i>	Complete as confirmed by review of recorded documents
4	Reduce the potential fire hazard by implementing a grass and brush clearance	CDA	<i>Ongoing</i>	Superseded by

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	program around all the buildings.			MM.11.a.1
5	Fire-retardant materials should be used on the roofs of the buildings and landscaping near buildings should be fire-resistant plants.	CDA	Prior to issuance of a building permit	Superseded by MM.11.a.1
6	Buildings in high hazard locations should use fire sprinklers to improve fire suppression.	CDA	Prior to issuance of a building permit	Superseded by MM.11.a.1
<b>HYDROLOGY (also see Utilities below)</b>				
1	Require execution of a standard watershed protection agreement with Marin Municipal Water District.	CDA	Prior to issuance of a building permit	Superseded by MM.12.c.1
2	Final approval for full project buildout should be contingent on the satisfactory detailed testing and system design as part of subsequent Development Plan. The study should include groundwater testing of the southeast field and groundwater testing and slope stability analysis for the central field. This more detailed investigation should be done in conjunction with the more detailed site design in the precise development plan stage.	CDA	Prior to Precise Development Plan approval	Superseded by MM.12.d.1
<b>COMMUNITY/CULTURAL FACTORS</b>				
1	Archaeological monitoring of the site during construction should be required to ensure identification and protection of any resources discovered during construction.	CDA	Ongoing	Superseded by MM.14.a.1, MM.14.b.1, MM.14.b.2, & MM.14.b.3
2	Construction activity should be limited to 8 AM to 5 PM, Monday through Saturday.	CDA	Ongoing	Superseded by §6.70.030 of the Marin County Code pursuant to

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				the Master Plan Amendment
3	Construction equipment should be properly muffled and shut-off when not in use.	CDA	Ongoing	Superseded by §6.70.030 of the Marin County Code pursuant to the Master Plan Amendment
	<b>TRANSPORTATION</b>			
1	Sponsor should develop and maintain a program to encourage carpooling for retreat participants.	CDA	Prior to issuance of a building permit	Superseded by MM.6.a
2	Driveway approach shall be designed as wide flare commercial type approach.	CDA	Prior to building occupancy	Complete as confirmed by site inspection
3	Landscaping shall be selected to protect sight lines for 1000 feet in either direction from driveway approach.	CDA	Prior to Precise Development Plan approval	Complete as confirmed by site inspection
4	A westbound deceleration lane shall be constructed (standard design given traffic speeds would be 530 feet in length).	CDA	Prior to building occupancy	Superseded by MM.6.e
5	An eastbound acceleration lane shall be constructed consistent with Caltrans' standards. As an alternative, left turns from the site should be prohibited, and eastbound traffic direct first to head west, then turn left looping through Woodacre to head east on Sir Francis Drake Boulevard.	CDA	Prior to building occupancy	Complete as confirmed by site

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				inspection
6	No workshop should conclude between hours of 1 PM and 7 PM on Sunday afternoons.	CDA	Ongoing	Eliminated as the result of the Master Plan Amendment
	<b>UTILITIES</b>			
1	Require use of water conserving devices and fixtures.	CDA	<i>Prior to building permit issuance</i>	Superseded by Marin Municipal Water District Code §13.02.021 pursuant to the Master Plan Amendment
2	Require submission of detailed grading and drainage plan as part of precise development plan application.	CDA	<i>Prior to Precise Development Plan approval</i>	Eliminated as the result of the Master Plan Amendment subject to MM.4.a.1, MM.4.a.2, and MM.4.c.1