

# Mitigation Monitoring and Reporting Program

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The Initial Study-Mitigated Negative Declaration (IS-MND) identifies the applicable mitigation measures that will be implemented to reduce the impacts associated with the City of Los Altos 2023-2031 Housing Element Update Project. The California Environmental Quality Act (CEQA) requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to proposed development. As stated in section 21081.6(a)(1) of the Public Resources Code:

...the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.

Section 21081.6 also provides general guidelines for implementing mitigation monitoring programs and indicates that specific reporting and/or monitoring requirements, to be enforced during project implementation, shall be defined as part of adopting a mitigated negative declaration.

To ensure that the mitigation measures are properly implemented, a monitoring program has been devised which identifies the timing and responsibility for monitoring each measure. Future project applicants will have the responsibility for implementing the measures that apply to development activity, and the various City of Los Altos departments will have the primary responsibility for monitoring and reporting the implementation of the mitigation measures.

The first column identifies mitigation measures that were identified in the IS-MND. The second column, entitled "Implementation Procedures," identifies the procedures for implementing the mitigation measure. The third column "Monitoring and Reporting Actions," refers to the monitoring action that must be taken to ensure the mitigation measure's implementation. The fourth column, entitled "Monitoring Timing," refers to when the monitoring will occur to ensure that the mitigation action is complete. The fifth column, "Responsible Agency," refers to the agency responsible for oversight or ensuring that the mitigation measure is implemented. The "Compliance Verification" column is where the Responsible Agency verifies that the measures have been implemented.

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<b>Air Quality</b>					
<b>AQ-1: Individual Air Quality Analysis</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>For individual projects subject to CEQA that do not meet the BAAQMD construction and/or operational screening criteria under Table 6, individual air quality analysis shall be conducted to determine project significance. Where individual projects exceed BAAQMD significance thresholds detailed under Table 7, mitigation measures shall be incorporated to reduce emissions to below thresholds. Construction mitigation measures may include, but are not limited to, incorporation of Tier 4 and/or alternative fueled equipment, use of onsite power sources instead of generators, and use of low/no-VOC content architectural coatings. Operational mitigation measures may include, but are not limited to, increased incorporation of photovoltaic systems (PV) beyond regulatory requirements, increased incorporation of EV charging stations and/or infrastructure beyond regulatory requirements, incorporation of a development-wide ride-share system, or elimination of natural gas usage within residential developments. Individual project analysis and accompanying emission-reduction measures shall be approved by the City prior to issuance of a permit to construct or permit to operate.</i></p>	<p>The City shall establish and apply a standard condition of approval requiring individual air quality analysis for projects that do not meet BAAQMD construction and/or operational screening criteria.</p>	<p>Verify that the standard condition of approval is established and applied; verify that individual air quality analysis is completed for projects that do not meet BAAQMD construction and/or operational screening criteria.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	
<b>AQ-2: Construction Emissions Measures</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>Project applicants shall comply with the current Bay Area Air Quality Management District’s basic control measures for reducing construction emissions of PM10 (Table 8-2, Basic Construction Mitigation Measures Recommended for All Proposed Projects, of the May 2017 BAAQMD CEQA Guidelines), outlined below.</i></p>	<p>The City shall establish and apply a standard condition of approval requiring the reduction of construction emissions.</p>	<p>Verify that the standard condition of approval is established and applied; verify that the project applicant complies with the current Bay Area Air</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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<ol style="list-style-type: none"> <li>1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day.</li> <li>2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.</li> <li>4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.</li> <li>5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.</li> <li>6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.</li> <li>7. All construction equipment shall be maintained and properly tuned in accordance with manufacture’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper conditions prior to operation. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. BAAQMD’s number shall also be visible to ensure compliance with applicable regulations.</li> </ol>		<p>Quality Management District’s basic control measures for reducing construction emissions of PM<sub>10</sub>.</p>			
<b>AQ-3: Construction Health Risk Assessment</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>For individual projects where construction activities would last longer than two months and where construction would occur within 1,000 feet of</i></p>	<p>The City shall establish and apply a standard condition of approval to require Tier 4 equipment and or</p>	<p>Verify that the standard condition of approval is established and applied; verify that Tier 4 equipment</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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<p><i>sensitive receptors, Tier 4 equipment and/or alternative fuel construction equipment shall be used.</i></p>	<p>alternative fuel equipment be used for projects lasting longer than two months and where construction would occur within 1,000 feet of sensitive receptors.</p>	<p>and or alternative fuel equipment is used for projects lasting longer than two months and where construction would occur within 1,000 feet of sensitive receptors.</p>			
<b>Biological Resources</b>					
<b>BIO-1: Special-status Bat Species Avoidance and Minimization</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring approval:</p> <p><i>For projects that involve demolition of uninhabited buildings or removal of mature trees large enough to contain crevices and hollows that could support bat roosting, focused surveys to determine the presence/absence of roosting bats shall be conducted prior to demolition or tree removal. If active maternity roosts are identified, a qualified biologist shall establish avoidance buffers applicable to the species, the roost location and exposure, and the proposed construction activity in the area. If active non-maternity day or night roosts are found on the project site, measures shall be implemented to passively relocate bats from the roosts prior to the onset of construction activities. Such measures may include removal of roosting site during the time of day the roost is unoccupied or the installation of one-way doors, allowing the bats to leave the roost but not to re-enter. These measures shall be presented in a Bat Passive Relocation Plan that shall be submitted to, and approved by, CDFW.</i></p>	<p>The City shall establish and apply a standard condition of approval to avoid and minimize effects to special-status bat species.</p>	<p>Verify that the standard condition of approval is established and applied; verify that focused bat surveys are conducted by a qualified biologist to determine the presence/absence of special status bat species.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	
<b>BIO-2: Biological Resources Screening and Assessment</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring approval:</p>	<p>The city shall establish and apply a</p>	<p>Verify that the standard condition</p>	<p>Prior to project approval.</p>	<p>City of Los Altos</p>	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<p><i>For projects on sites located on or adjacent to a creek, the project applicant shall hire a qualified biologist to perform a preliminary biological resources screening, for the City's review and approval, to determine whether the project has the potential to impact special status biological resources, inclusive of special status plants and animals, sensitive vegetation communities, jurisdictional waters (including creeks, drainages, streams, ponds, vernal pools, riparian areas and other wetlands), critical habitat, wildlife movement area, or biological resources protected under local or regional ordinances or an existing HCP or NCCP. If it is determined that the project has no potential to impact biological resources, no further action is required.</i></p> <p><i>If the project would have the potential to impact biological resources, prior to construction, a qualified biologist shall conduct a project-specific biological analysis to document the existing biological resources within a project footprint plus a minimum buffer of 50 feet around the project footprint, as is feasible, and to determine the potential impacts to those resources, as approved by the City. The project-specific biological analysis shall evaluate the potential for impacts to all biological resources including, but not limited to special status species, nesting birds, wildlife movement, sensitive plant communities, critical habitats, and other resources judged to be sensitive by local, State, and/or federal agencies. If the project would have the potential to impact these resources, recommendations developed to enhance wildlife movement (e.g., installation of wildlife friendly fencing), as applicable, to reduce impacts to less than significant levels. Pending the results of the project-specific biological analysis, City review, design alterations, further technical studies (e.g., protocol surveys) and consultations with the USFWS, NMFS, CDFW, and/or other local, State, and federal agencies may be required.</i></p>	<p>standard condition of approval to screen for biological resources on the project site for projects requiring approval.</p>	<p>of approval is established and applied; verify that for projects on sites located on or adjacent to a creek, the project applicant has hired a qualified biologist to perform a preliminary biological resources screening.</p>	<p>.</p>	<p>Planning Division</p>	
<b>BIO-3: Jurisdictional Delineation</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring approval:</p>	<p>The City shall establish and apply a standard condition</p>	<p>Verify that the standard condition of approval is</p>	<p>Prior to project approval.</p>	<p>City of Los Altos</p>	

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<p><i>If potentially jurisdictional waters and/or wetlands are identified by the project-specific analysis (as required by Mitigation Measure BIO-3), for projects on sites that are on or adjacent (within 200 feet) to a creek, a qualified biologist shall complete a jurisdictional delineation to determine the extent of the jurisdictions for CDFW, USACE, and/or RWQCB. This delineation shall be conducted in accordance with the requirements set forth by each agency. The result shall be a preliminary jurisdictional delineation report that shall be submitted to the City, USACE, RWQCB, and CDFW, as appropriate, for review and approval. Jurisdictional areas shall be avoided. If jurisdictional areas are expected to be impacted, then the RWQCB would require a Waste Discharge Requirements (WDRs) permit and/or Section 401 Water Quality Certification (depending upon whether the feature falls under federal jurisdiction). If CDFW asserts its jurisdictional authority, then a Streambed Alteration Agreement pursuant to Section 1600 et seq. of the CFGC would also be required prior to construction within the areas of CDFW jurisdiction. If the USACE asserts its authority, then a permit pursuant to CWA Section 404 would likely be required. Furthermore, a compensatory mitigation program shall be implemented in accordance with Mitigation Measure BIO-4 and the measures set forth by the aforementioned regulatory agencies during the permitting process. Compensatory mitigations for all permanent impacts to waters of the U.S. and waters of the state shall be completed at a ratio as required in applicable permits but shall not be less than a minimum ratio of 1:1. All temporary impacts to waters of the U.S. and waters of the State shall be fully restored to natural condition. The project applicant shall submit the report documenting restoration activities and monitoring to the City for review and approval.</i></p>	<p>of approval requiring a qualified biologist to complete a jurisdictional delineation for projects which have potentially jurisdictional waters and/or wetlands or a creek on site.</p>	<p>established and applied; verify that a qualified biologist completes a jurisdictional delineation if necessary.</p>		<p>Planning Division</p>	
<p><b>BIO-4: General Avoidance and Minimization</b></p>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring approval:</p> <p><i>Potential jurisdictional features on sites identified in jurisdictional delineation reports shall be avoided. Projects that may impact jurisdictional features shall include a report detailing how all identified jurisdictional</i></p>	<p>The City shall establish and apply a standard condition of approval requiring the avoidance of</p>	<p>Verify that the standard condition of approval is established and applied; verify that</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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<p><i>features will be avoided, including groundwater draw down. The project applicant shall submit this report to the City for review and approval prior to construction.</i></p> <ul style="list-style-type: none"> <li><i>Material/spoils generated from project activities shall be located away from jurisdictional areas or special-status habitat and protected from storm water run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls (non- monofilament), covers, sand/gravel bags, and straw bale barriers, as appropriate.</i></li> <li><i>Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank.</i></li> </ul> <p><i>Any spillage of material will be stopped if it can be done safely. The contaminated area will be cleaned, and any contaminated materials properly disposed. For all spills, the project foreman or designated environmental representative will be notified.</i></p>	<p>potential jurisdictional features identified in jurisdictional delineation reports.</p>	<p>that jurisdictional features are avoided on site.</p>			
<p><b>BIO-5: Preconstruction Surveys for Nesting Birds</b></p>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>For projects that would involve native or naturalized vegetation or tree removal, a general pre-construction nesting bird survey shall be conducted by a qualified biologist within 14 days prior to the initiation of construction activities. If construction is stopped for more than 14 days during the nesting season, a pre-construction survey shall be conducted prior to the re-start of construction activities. Surveys shall include the disturbance area plus a 50-foot buffer for passerine species, and a 500-foot buffer for raptors.</i></p> <p><i>If active nests are located, an appropriate avoidance buffer shall be established within which no work activity would be allowed that would impact these nests. The avoidance buffer shall be established by the qualified biologist on a case-by-case basis based on the species and site conditions. Larger buffers may be required depending upon the status of</i></p>	<p>The City shall establish and apply a standard condition of approval to avoid and minimize impacts to nesting birds that may be on the project site through surveying by a qualified biologist and the establishment of an avoidance buffer if active nests are found.</p>	<p>Verify that the standard condition of approval is established and applied; verify that a bird survey is conducted by a qualified biologist on the project site.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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*the nest and the construction activities occurring in the vicinity of the nest. The buffer area(s) shall be closed to all construction personnel and equipment until juveniles have fledged and/or the nest is inactive. A qualified biologist shall confirm that breeding/nesting is complete, and the nest is no longer active prior to removal of the buffer. If work within a buffer area cannot be avoided, then a qualified biologist shall be present to monitor all project activities that occur within the buffer. The biological monitor shall evaluate the nesting avian species for signs of disturbance and shall have the ability to stop work.*

**Cultural Resources**

**CUL-1: Archaeological Resources Assessment**

The City shall establish the following Standard Condition of Approval for projects requiring City approval:

*Prior to approval of any individual development projects under the 2023-2031 Housing Element that will involve ground disturbance activities that may include, but are not limited to, grading and excavation, an archaeological resources assessment shall be performed under the supervision of an archaeologist that meets the Secretary of the Interior’s Professional Qualifications Standards in either prehistoric or historic archaeology. Assessments shall include a California Historical Resources Information System (CHRIS) records search at the Northwest Information Center (NWIC) and a Sacred Lands File Search maintained by the Native American Heritage Commission (NAHC). The records searches shall characterize the results of previous cultural resource surveys and disclose any cultural resources that have been recorded and/or evaluated in and around the project site. A Phase I pedestrian survey shall be undertaken in proposed project sites that are undeveloped to identify the presence or absence of any surface cultural materials. By performing a records search, a Sacred Lands File search, and a Phase I survey, a qualified archaeologist will classify the project site as having high, medium, or low sensitivity for archaeological resources.*

The City shall establish and apply a standard condition of approval requiring an archeological resources assessment be conducted on the proposed project site.	Verify that the standard condition of approval is established and applied; verify that an archaeological assessment of the proposed project site is conducted.	Prior to project approval.	City of Los Altos Planning Division
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Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<p><i>If the Phase I archaeological survey identifies resources that may be affected by the project, the archaeological resources assessment shall also include Phase II testing and evaluation. If resources are determined significant or unique through Phase II testing and site avoidance is not possible, appropriate site-specific mitigation measures shall be identified in the Phase II evaluation. These measures may include, but would not be limited to, a Phase III Data Recovery Program, avoidance, or other appropriate actions to be determined by a qualified archaeologist. If significant archaeological resources cannot be avoided, impacts may be reduced to less than significant by adding fill soils on top of the resources rather than cutting into the cultural deposits. Alternatively, and/or in addition, a data collection program may be warranted, including mapping the location of artifacts, surface collection of artifacts, or excavation of the cultural deposit to characterize the nature of the buried portions of sites. Curation of the excavated artifacts or samples would occur as specified by the archaeologist in consultation with the City of Los Altos and with other relevant parties.</i></p>					
<b>CUL-2: Unanticipated Discoveries of Archaeological Resources</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>In the event that archaeological resources are unexpectedly encountered during ground-disturbing activities associated with the 2023-2031 Housing Element, work within 50 feet of the find shall halt and an archaeologist meeting the Secretary of the Interior’s Professional Qualifications Standards for archaeology (National Park Service 1983) shall be contacted immediately to evaluate the resource. If the resource is determined by the qualified archaeologist to be prehistoric, then a Native American representative shall also be contacted to participate in the evaluation of the resource. If the qualified archaeologist and/or Native American representative determines it to be appropriate, archaeological testing for CRHR eligibility shall be completed. If the resource proves to be eligible for the CRHR and significant impacts to the resource cannot be avoided via project redesign, a qualified archaeologist shall prepare a data recovery</i></p>	<p>The City shall establish and apply a standard condition of approval to provide guidance in the case that archaeological resources are unexpectedly encountered during ground-disturbing activities.</p>	<p>Verify that the standard condition of approval is established and applied; verify that all ground-disturbing activities are halted in the case that archeological resources are discovered on the project site.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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*plan tailored to the physical nature and characteristics of the resource, per the requirements of California Code of Regulations (CCR) Guidelines Section 15126.4(b)(3)(C). The data recovery plan shall identify data recovery excavation methods, measurable objectives, and data thresholds to reduce any significant impacts to cultural resources related to the resource. Pursuant to the data recovery plan, the qualified archaeologist and Native American representative, as appropriate, shall recover and document the scientifically consequential information that justifies the resource’s significance. The City of Los Altos shall review and approve the treatment plan and archaeological testing as appropriate, and the resulting documentation shall be submitted to the regional repository of the California Historical Resources Information System, per CCR Guidelines Section 15126.4(b)(3)(C).*

**Geology and Soils**

**GEO-1: Protection of Paleontological Resources**

The City shall establish the following Standard Condition of Approval for projects requiring approval in areas of high paleontological sensitivity (Quaternary (Pleistocene) alluvial fan and fluvial deposits and Santa Clara Formation) and that involve ground disturbance below the level of past disturbance:

**Paleontological Resources Assessment**

*Prior to initial ground disturbance, the applicant shall retain a Qualified Professional Paleontologist, as defined by the SVP (2010), to conduct a paleontological resources assessment (PRA). The PRA shall determine the age and paleontological sensitivity of geologic formations underlying the proposed disturbance area, consistent with SVP (2010) guidelines for categorizing paleontological sensitivity of geologic units within a project area.*

*If underlying formations are found to have a high potential for paleontological resources, the Qualified Professional Paleontologist shall create a Paleontological Mitigation and Monitoring Program, which will be approved by the City and contain the following elements:*

The City shall establish and apply a standard condition of approval to protect paleontological resources.	Verify that the standard condition of approval is established and applied; verify that a paleontological resources assessment is completed and a Paleontological Worker Environmental Awareness Program is carried out.	Prior to project approval.	City of Los Altos Planning Division
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Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<p><b>Paleontological Worker Environmental Awareness Program (WEAP)</b>  <i>Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and procedures for notifying paleontological staff should fossils be discovered by construction staff.</i></p> <p><b>Paleontological Monitoring</b>  <i>Full-time paleontological monitoring shall be conducted during ground disturbing construction activities (i.e., grading, trenching, foundation work) in sediments assigned a high paleontological sensitivity. Paleontological monitoring shall be conducted by a qualified Paleontological Resources Monitor, as defined by the SVP (2010). The duration and timing of the monitoring will be determined by the Qualified Professional Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City. If the Qualified Professional Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Professional Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, all work in the immediate vicinity of the find shall cease. A Qualified Professional Paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil is scientifically significant, then it shall be salvaged, identified to the lowest possible taxonomic level, and curated in a scientific institution with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils</i></p>					

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*recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.*

**Hazards and Hazardous Materials**

**HAZ-1: Database Review and Investigation**

The City shall establish the following Standard Condition of Approval for projects requiring approval:

*Prior to issuance of a grading permit, the SWRCB’s GeoTracker database and DTSC’s EnviroStor database shall be consulted by City staff or consultant to determine whether or not the site to be graded is within 500 feet of an identified active hazardous material site.*

*If the site is identified in the GeoTracker or EnviroStor databases within 500 feet of an identified active hazardous material site, or if the site to be graded is located on a site that:*

- *Was currently and/or historically used for railroad, agricultural, or industrial uses.*
- *Was previously or is currently utilized to store, handle, and/or generate hazardous materials.*
- *Has unknown previous site uses; and/or*
- *Was previously or is currently utilized as a manufacturing facility, a gasoline station, automobile repair shop (or similar), or dry cleaner,*

*The following process shall be followed prior to issuance of a grading permit:*

- *The project applicant shall retain a qualified environmental professional (Professional Geologist or Professional Civil Engineer) to prepare a Phase I ESA in accordance with current ASTM standards.*
- *If the Phase I ESA identifies any potential contamination sources, the project applicant shall retain a qualified environmental consultant to prepare a Phase II ESA (subsurface investigation) to determine whether the identified potential sources have resulted in soil,*

The City shall establish and apply a standard condition of approval outlining the process that shall be followed prior to issuance of a grading permit including the requirement that the GeoTracker and EnviroStar databases are consulted.

Verify that the standard condition of approval is established and applied; verify that evidence of regulatory database review and investigation has been provided by the project applicant.

Prior to project approval.

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<p><i>groundwater, or soil vapor contamination exceeding regulatory action levels.</i></p> <ul style="list-style-type: none"> <li><i>If the Phase II ESA identifies contamination exceeding applicable regulatory screening levels for construction workers and future site users published by the Regional Water Quality Control Board (RWQCB), Department of Toxic Substances Control (DTSC), and/or Environmental Protection Agency (EPA), a Soil Management Plan shall be prepared (see HAZ-2).</i></li> <li><i>If the Phase II ESA identifies contamination exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), remediation shall be conducted (see HAZ-3).</i></li> </ul> <p><i>The project applicant shall provide written evidence of regulatory database review and investigation. The City of Los Altos shall ensure that evidence of regulatory database review and investigation has been provided by the project applicant prior to project approval.</i></p>					
<b>HAZ-2: Soil Management Plan for Impacted Soils</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>If impacted soils or other impacted wastes are present at the project site, the project applicant shall retain a qualified environmental professional to prepare a Soil Management Plan (SMP) prior to construction. The SMP, or equivalent document, shall be prepared to address onsite handling and management of impacted soils or other impacted wastes and reduce hazards to construction workers and offsite receptors during construction. The plan must establish remedial measures and/or soil management practices to ensure construction worker safety, the health of future workers and visitors, and the off-site migration of contaminants from the site. These measures and practices may include, but are not limited to:</i></p> <ul style="list-style-type: none"> <li><i>Stockpile management including stormwater pollution prevention and the installation of BMPs</i></li> </ul>	<p>The City shall establish and apply a standard condition of approval requiring a Soil Management Plan for sites that have impacted soils or other impacted wastes.</p>	<p>Verify that the standard condition of approval is established and applied; verify that a soil management plan is established by a qualified environmental professional If impacted soils or other impacted wastes are present at the project site.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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<ul style="list-style-type: none"> <li>Guidance regarding proper disposal procedures of contaminated materials</li> <li>Guidance regarding monitoring, reporting, and regulatory agency notification</li> <li>A health and safety plan (HASP) for contractors working at the site that addresses the safety and health hazards of each phase of site construction activities with the requirements and procedures for employee protection</li> <li>The HASP shall also outline proper soil handling procedures and health and safety requirements to minimize worker and public exposure to hazardous materials during construction.</li> </ul> <p>The project applicant shall prepare and implement a written Soil Management Plan and ensure that an appropriate regulatory oversight agency, such as Santa Clara County Department of Environmental Health, reviews and approves the development site Soil Management Plan, HASP, and remedial measures for impacted soils.</p> <p>The City of Los Altos shall ensure that a written Soil Management Plan, HASP, and remedial measures for impacted soils has been prepared and approved prior to issuance of a grading permit.</p>					
<b>HAZ-3: Remediation</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>If soil present within the construction envelope at the development site contains chemicals at concentrations exceeding hazardous waste screening thresholds for contaminants in soil (California Code of Regulations [CCR] Title 22, Section 66261.24), the project applicant shall retain a qualified environmental consultant (PG or PE), to conduct additional analytical testing and recommend soil disposal recommendations, or consider other remedial engineering controls, as necessary.</i></p> <p><i>The qualified environmental consultant shall use the development site analytical results for waste characterization purposes prior to offsite transportation or disposal of potentially impacted soils or other impacted</i></p>	<p>The City shall establish and apply a standard condition of approval requiring a Soil Management Plan for sites that have impacted soils or other impacted wastes.</p>	<p>Verify that the standard condition of approval is established and applied; verify that the project applicant has retained a qualified environmental professional to create a Soil Management Plan for sites that have</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<p>wastes. The qualified environmental consultant shall provide disposal recommendations and arrange for proper disposal of the waste soils or other impacted wastes (as necessary), and/or provide recommendations for remedial engineering controls, if appropriate.</p> <p>The project applicant or their contractors shall provide evidence that remediation reduced contaminant levels to below applicable federal, State, and local regulations for human and environmental health, and below hazardous materials threshold concentrations. Evidence of compliance may include, but is not limited to, notifying the appropriate oversight agency (e.g., SCCDEH) of the contamination, hiring a qualified environmental professional to conduct the necessary assessments and abatement (including soil sampling, preparing a remediation plan to adequately abate the hazardous materials, and ultimately obtaining necessary clearance letters from the oversight agency), and issuance of a No Further Action letter, if applicable.</p> <p>City of Los Altos shall ensure that evidence of remediation compliance has been provided by the project applicant, prior to issuing an occupancy permit.</p>		impacted soils or other impacted wastes.			

Noise

**NOI-1: Construction Noise Reduction Measures**

<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>For development projects involving construction within 50 feet of sensitive receivers, the applicant shall develop a site-specific Construction Noise Reduction Program prepared by a qualified acoustical consultant to reduce construction noise impacts to the maximum extent feasible, subject to review and approval of the Planning Director in advance of issuance of building permits. The following measures to minimize exposure to construction noise shall be included:</i></p> <ol style="list-style-type: none"> <li><b>Mufflers.</b> During excavation and grading construction phases, all construction equipment, fixed or mobile, shall be operated with closed</li> </ol>	The City shall establish and apply a standard condition of approval requiring a Construction Noise Reduction Program for projects involving construction within 50 feet of sensitive receivers.	Verify that the standard condition of approval is established and applied; verify that the project applicant develops a Construction Noise Reduction Program.	Prior to project approval.	City of Los Altos Planning Division	
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Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<p><i>engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers’ standards.</i></p> <ol style="list-style-type: none"> <li>2. <b>Air compressors.</b> Utilize “quiet” models of air compressors and other stationary noise sources to the greatest extent practicable. Select hydraulically or electrically powered equipment and avoid pneumatically powered equipment where feasible.</li> <li>3. <b>Pile driving.</b> If pile driving is required, pre-drill foundation pile holes to minimize the number of impacts required to seat the pile. Examine whether the use of sonic pile driving is feasible and quieter. If so, utilize that method.</li> <li>4. <b>Stationary Equipment.</b> All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers. Construct temporary noise barriers or partial enclosures to acoustically shield such equipment to the maximum extent feasible.</li> <li>5. <b>Equipment Staging Areas.</b> Equipment staging shall be located in areas that will create the greatest distance feasible between construction-related noise sources and noise-sensitive receivers.</li> <li>6. <b>Smart Back-up Alarms.</b> Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. Alternatively, back-up alarms shall be disabled and replaced with human spotters to ensure safety when mobile construction equipment is moving in the reverse direction.</li> <li>7. <b>Perimeter Noise Reduction.</b> Construct solid plywood fences around construction sites adjacent to operational business, residences or other noise-sensitive land uses where the noise control plan analysis determines that a barrier would be effective at reducing noise.</li> <li>8. <b>Signage.</b> For the duration of construction, the applicant or contractor shall post a sign in a construction zone that includes contact information for any individual who desires to file a noise complaint.</li> </ol>					



Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<b>NOI-2: Vibration Control Plan</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>For projects involving vibratory rollers within 25 feet of a historic structure, and/or the use of pile drivers, the applicant shall prepare a Vibration Control Plan prior to the commencement of construction activities. The Vibration Control Plan shall be prepared by a licensed structural engineer and shall include methods to minimize vibration, including, but not limited to:</i></p> <ul style="list-style-type: none"> <li>• <i>Use of drilled piles or similar method (e.g., cast-in-place systems) rather than pile driving</i></li> <li>• <i>Use of resonance-free vibratory pile drivers/rollers</i></li> <li>• <i>Avoiding the use of vibrating equipment when allowed by best engineering practices</i></li> </ul> <p><i>The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions of buildings within a 50-foot radius as well as at potentially affected extremely fragile buildings/historical resources and/or residential structures within the vicinity of the construction site. The condition of existing potentially affected properties shall be documented by photos and description of existing condition of building facades, noting existing cracks. The survey letter shall provide a shoring design to protect such buildings and structures from potential damage. At the conclusion of vibration causing activities, the qualified structural engineer hired by the applicant shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed by the contractor and monitored by a qualified structural engineer in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).</i></p> <p><i>A Statement of Compliance signed by the applicant and owner is required to be submitted to the City Building Department at plan check and prior to</i></p>	<p>The City shall establish and apply a standard condition of approval requiring the applicant to prepare a vibration control plan prior to the commencement of construction activities.</p>	<p>Verify that the standard condition of approval is established and applied; verify that the project applicant prepares a vibration control plan.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<p><i>the issuance of any permit. The Vibration Control Plan, prepared as outlined above, shall be documented by a qualified structural engineer, and shall be provided to the City upon request. A Preservation Director shall be designated, and this person’s contact information shall be posted in a location near the project site that it is clearly visible to the nearby receivers most likely to be disturbed. The Director will manage complaints and concerns resulting from activities that cause vibrations. The severity of the vibration concern should be assessed by the Director, and if necessary, evaluated by a qualified noise and vibration control consultant.</i></p>					
<b>Transportation</b>					
<b>TRA-1: Vehicle Miles Traveled (VMT) Reduction Mitigation for APN #18956014 and #31801036</b>					
<p>The City shall require the following Standard Condition of Approval for projects on APN #18956014 and #31801036:</p> <p><i>Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 3 VMT mitigation measures:</i></p> <ul style="list-style-type: none"> <li>▪ <b>Tier 1:</b> <i>Project characteristics that encourage walking, biking, and transit uses.</i></li> <li>▪ <b>Tier 2:</b> <i>Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:</i> <ul style="list-style-type: none"> <li>○ <i>Increase bike access</i></li> <li>○ <i>Improve connectivity by increasing intersection density</i></li> <li>○ <i>Increase transit accessibility</i></li> <li>○ <i>Traffic calming measures beyond the project frontage</i></li> <li>○ <i>Pedestrian network improvements beyond the project frontage</i></li> </ul> </li> <li>▪ <b>Tier 3:</b> <i>Parking measures that discourage personal motorized vehicle trips. These improvements include:</i> <ul style="list-style-type: none"> <li>○ <i>Limit parking supply</i></li> </ul> </li> </ul>	<p>The City shall establish and apply a standard condition of approval requiring the project applicant to demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 3 VMT mitigation measures.</p>	<p>Verify that the standard condition of approval is established and applied; verify that the project applicant reduces VMT for projects on APN #18956014 and #31801036</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
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- Provide bike facilities

The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval.

**TRA-2: VMT Reduction Mitigation for APN #31816022, #32601052, #32601053, and #33609018**

The City shall require the following Standard Condition of Approval for projects on #31816022, #32601052, #32601053, and #33609018:

*Prior to issuance of a building permit, the project applicant shall demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 4 VMT mitigation measures:*

- **Tier 1:** Project characteristics that encourage walking, biking, and transit uses.
- **Tier 2:** Multimodal network improvements that increase accessibility for transit users, bicyclists, and pedestrians. These improvements include:
  - Increase bike access
  - Improve connectivity by increasing intersection density
  - Increase transit accessibility
  - Traffic calming measures beyond the project frontage
  - Pedestrian network improvements beyond the project frontage
- **Tier 3:** Parking measures that discourage personal motorized vehicle trips. These improvements include:
  - Limit parking supply
  - Provide bike facilities
- **Tier 4:** Transportation Demand Management (TDM) measures that provide incentives and services to encourage alternatives to personal motorized vehicle trips. These measures for residential developments include:
  - School pool programs
  - Bike share programs

The City shall establish and apply a standard condition of approval requiring the project applicant to demonstrate VMT reduction using the Santa Clara County VMT Evaluation Tool for implementing Tier 1 through Tier 4 VMT mitigation measures.

Verify that the standard condition of approval is established and applied; verify that the project applicant reduced VMT for projects on APN #31816022, #32601052, #32601053, and #33609018.

Prior to project approval.

City of Los Altos Planning Division

Mitigation Measure	Implementation Procedures	Monitoring and Reporting Action	Monitoring Timing	Monitoring Responsibility	Compliance Verification (Initial, Date, Comments)
<ul style="list-style-type: none"> <li>○ Car share programs</li> <li>○ Subsidized transit program</li> <li>○ Unbundle parking costs from property costs</li> <li>○ Voluntary travel behavior change program</li> </ul> <p><i>The City of Los Altos shall review project plans to ensure that the appropriate VMT mitigation measures are implemented prior to project approval. TDM measures shall be enforced through annual trip monitoring to assess the project’s status in meeting the VMT reduction goals.</i></p>					
<b>Tribal Cultural Resources</b>					
<b>TCR-1: Suspension of Work Around Potential Tribal Cultural Resources</b>					
<p>The City shall establish the following Standard Condition of Approval for projects requiring City approval:</p> <p><i>In the event that archaeological resources of Native American origin are identified during implementation of the proposed project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist has evaluated the nature and significance of the find as a cultural resource and an appropriate local Native American representative is consulted. If the City of Los Altos, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the appropriate local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery. The City of Los Altos Community Development Director or designee shall review and approve the plan prior to implementation.</i></p>	<p>The City shall establish and apply a standard condition of approval requiring the suspension of all earth-disturbing work in the case that archaeological resources of Native American origin are identified during implementation of the proposed project.</p>	<p>Verify that the standard condition of approval is established and applied; verify that all earth-disturbing work is suspended if archaeological resources of Native American origin are identified during implementation of the proposed project.</p>	<p>Prior to project approval.</p>	<p>City of Los Altos Planning Division</p>	

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