



MITIGATION MONITORING & REPORTING PROGRAM

Ravenswood Business District/Four Corners Specific Plan Update

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
AIR QUALITY					
<p>Impact AIR-1: Future projects under the Specific Plan Update could result in construction criteria pollutant emissions above BAAQMD thresholds resulting in a cumulatively considerable contribution to a significant regional air quality impact. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM AIR-1.1: Construction criteria pollutant and TAC quantification shall be required for individual projects developed under the Specific Plan Update once construction equipment and phasing details are available through modeling to identify impacts and, if necessary, include measures to reduce emissions below the applicable BAAQMD construction thresholds. Reductions in emissions can be accomplished through, not limited to, the following:</p> <ul style="list-style-type: none"> • All construction equipment larger than 25 horsepower used at the future development sites for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for NOx and PM (PM10 and PM2.5), if feasible, otherwise, <ul style="list-style-type: none"> ○ If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 2 or 3 engines and include particulate matter emissions control 	Project Applicant and Contractors	Prior to project approval and during construction	Oversight of implementation by the City's Community and Economic Development Department, Planning and Building Divisions	Ensure individual projects complete a construction criteria pollutant emissions assessment. All measures will be printed on the project plans prior to issuance of permits.	Construction criteria pollutant emissions assessment prior to each project approval

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<p>equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve an 85-percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).</p> <ul style="list-style-type: none"> ○ Use of alternatively fueled equipment with lower NOx emissions that meet the NOx and PM reduction requirements above. ○ Special equipment that cannot meet the above requirements must be approved as exempt by the City after considering reasons for requesting an exemption. ○ Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines is not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not significantly compromise construction schedules.. <ul style="list-style-type: none"> ● Diesel engines, whether for off road equipment or on road vehicles, shall not be left idling for more than two minutes, except as provided in exceptions to the 					

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<p>applicable state regulations (e.g., traffic conditions, safe operating conditions). The construction sites shall have posted legible and visible signs in designated queuing areas and at the construction site to clearly notify operators of idling limit.</p> <ul style="list-style-type: none"> • Provide line power to the site during the early phases of construction to minimize the use of diesel-powered stationary equipment. • Utilize low volatile organic compound (VOC) (i.e., ROG emitting) coatings, that are below current BAAQMD requirements (i.e., Regulation 8, Rule 3; Architectural Coatings), for at least 80 percent of all residential and nonresidential interior paints and 80 percent of exterior paints. This includes all architectural coatings applied during both construction and reapplications throughout the project's operational lifetime. At least 80 percent of coatings applied must meet a "super-compliant" VOC standard of less than 10 grams of VOC per liter of paint. For reapplication of coatings during the project's operational lifetime, the Declaration of Covenants, Conditions, and Restrictions shall contain a stipulation for low VOC coatings to be used. Examples of "super-compliant" coatings are contained in the South Coast Air Quality Management District's website. • 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 posted for construction workers at all access points. 					

Impact AIR-3: Fugitive dust emissions from future projects' construction diesel exhaust and equipment could result in significant health risk impacts to nearby

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sensitive receptors. (Less than Significant Impact with Mitigation Incorporated)					
<p>MM AIR-3.1: The applicant shall require all construction contractors to implement the best construction measures recommended by BAQMD to reduce fugitive dust emissions. Emission reduction measures will include, at a minimum, the following measures: </p> <ul style="list-style-type: none"> • All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. • All haul trucks transporting soil, sand, or other loose material off-site shall be covered. • 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. • All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph). • 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. • All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 miles per hour • All trucks and equipment, including their tires, shall be washed off prior to leaving the site. • Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel. 	Project Applicant and Contractors	All measures will be printed on the project plans prior to issuance of permits, and the measures implemented during project construction	Oversight of implementation by the City's Community and Economic Development Department, Planning Division and Building Division Bay Area Air Quality Management District	All measures will be printed on the project plans prior to issuance of permits to ensure that the Project Contractor implements measures to reduce fugitive dust emissions from construction equipment during construction.	Throughout construction period

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<ul style="list-style-type: none"> Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations. 					
<p>MM AIR-3.2: Future projects which would have construction emissions that exceed BAAQMD thresholds shall implement the following Enhanced Construction Best Management Practices, which include but would not be limited to the measures below. Future project applicants shall submit these measures to the City for approval.</p> <ul style="list-style-type: none"> Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities. Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity. Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and watered appropriately until vegetation is established. Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent. Minimize the amount of excavated material or waste materials stored at the site. 	Project Applicant and Contractors	All measures will be printed on the project plans prior to issuance of permits, and the measures implemented during project construction	Oversight of implementation by the City's Community and Economic Development Department, Planning Division and Building Division	Review plan submitted by Project Applicant and Contractors. All measures will be printed on the project plans prior to issuance of permits to ensure that the Project Contractor implements measures to reduce fugitive dust emissions from construction equipment during construction.	Throughout construction period.

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<ul style="list-style-type: none"> Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days. 					
<p>Impact AIR-4: The construction exhaust emissions from future projects could exceed BAAQMD thresholds and may result community health risks for sensitive receptors such as nearby residents. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM AIR-4.1: Applicants proposing development of projects within 1,000 feet of existing sensitive receptors as defined by the BAAQMD (e.g., residential uses, schools) shall prepare a site-specific construction health risk assessment (HRA). If the HRA demonstrates, to the satisfaction of the City, that the health risk exposures for adjacent receptors will be less than BAAQMD project-level thresholds, then additional mitigation would not be required. However, if the HRA demonstrates that health risks would exceed BAAQMD project-level thresholds, additional feasible on- and off-site mitigation shall be identified to further reduce risks to the greatest extent practicable.</p> <p>Measures to avoid significant construction health risks impacts that could be included in projects, depending on the results of the project-specific HRAs could include:</p> <ul style="list-style-type: none"> Use Tier 4 engines for all off-road equipment greater than 50 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities. Use diesel trucks with 2010 or later compliant model year engines during construction. 	<p>Project Applicant and Contractors</p>	<p>HRA (Prior to each future project approval)</p> <p>Measures to avoid health risks (During construction)</p>	<p>Oversight of implementation by the City’s Community and Economic Development Department, Planning Division and Building Division</p>	<p>Review HRA</p> <p>All measures will be printed on the project plans prior to issuance of permits.</p>	<p>Review HRA prior to each project approval</p>

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<ul style="list-style-type: none"> • Use renewable diesel during construction. • Use low-VOC coatings during construction. • Implement fugitive dust best management practices and if necessary, enhanced measures recommended by BAAQMD. • Use portable electrical equipment where commercially available and practicable to complete construction. Construction contractors shall utilize electrical grid power instead of diesel generators when (1) grid power is available at the construction site; (2) when construction of temporary power lines are not necessary in order to provide power to portions of the site distant from existing utility lines; (3) when use of portable extension lines is practicable given construction safety and operational limitations; and (4) when use of electrical grid power does not compromise construction schedules. • Phase construction appropriate to lower the intensity of emissions at any one location with sensitive receptors. • Provide enhanced air filtration for sensitive receptors adversely affected by project emissions. 					
BIOLOGICAL RESOURCES					
<p>Impact BIO-1: Disturbance or destruction of individual special-status plant species such as the Congdon’s tarplant, alkali milk vetch, and Point Reyes bird’s beak could occur during construction activities associated with future development projects, resulting in a significant impact to these species. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM BIO-1.1: Prior to initial ground disturbance for Specific Plan-related projects in salt marsh, tidal slough, and grassland/ruderal habitats as depicted on Figure 3.4-1, a</p>	Project Applicant and	Prior to ground disturbance	Oversight of implementation by the City’s	Review of a report indicating the results of the	Once if target special-status species are not

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<p>qualified plant ecologist shall conduct an appropriately timed survey for Congdon's tarplant, Alkali milk vetch, and Point Reyes bird's beak within the project footprint, and (as access and visibility allow) a 50-foot buffer around the project footprint. If areas within 50 feet around the project footprint extend into adjacent properties, the buffer area will be surveyed as feasible using binoculars and/or by requesting permission from adjacent landowners. This buffer may be increased by the qualified plant ecologist depending on site-specific conditions and activities planned in the areas but must be at least 50 feet wide (to the extent that access and visibility allow). Situations for which a greater buffer may be required include proximity to proposed activities expected to generate large volumes of dust, such as grading; potential for project activities to alter hydrology supporting habitat for the species; or proximity to proposed structures that may shade areas farther than 50 feet away.</p> <p>Surveys should be conducted in a year with near-average or above-average precipitation; surveys conducted in a year of below-average rainfall would be considered valid if examination of reference populations of the target species indicate that the species would be detectable if present. The purpose of the survey shall be to assess the presence or absence of special-status plants, including Congdon's tarplant, alkali milk vetch, and Point Reyes bird's beak.</p> <p>If the target species are not found in the impact area or the identified buffer, then no further mitigation shall be warranted. If the target species, or any other special-status plants are found in the impact area or identified buffers, MM</p>	Contractors		Community and Economic Development Department, Planning Division.	<p>special status plan species survey and any designated buffer zones to the satisfaction of the City of East Palo Alto Planning Manager.</p> <p>All measures will be printed on the project plans prior to issuance of permits.</p>	<p>found in the impact area or the identified buffer.</p> <p>If the target species, or any other special-status plants are found in the impact area or identified buffers, MM BIO-1.2 and MM BIO-1.3 would be implemented. See MM BIO 1.2 and 1.3 below for additional details.</p>

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BIO-1.2 and MM BIO-1.3 would be implemented.					
<p>MM BIO-1.2: Special-Status Plant Avoidance Buffers. To the extent feasible, and in consultation with a qualified plant ecologist, the project proponent shall submit to the City a design for the proposed project, if feasible, to completely avoid impacts on all populations of special-status plants within the project footprints or within the identified buffers of the impact areas. Avoided special-status plant populations shall be protected by establishing and observing the identified buffer between plant populations and the impact area. All such populations located in the impact area or the identified buffer, and their associated designated avoidance areas, shall be clearly depicted on any construction plans. In addition, prior to initial ground disturbance or vegetation removal, the limits of the identified buffer around special-status plants to be avoided shall be marked in the field (e.g., with flagging, fencing, paint, or other means appropriate for the site in question). This marking shall be maintained intact and in good condition throughout project-related construction activities.</p> <p>If complete avoidance is not feasible and more than 10 percent of a population (by occupied area or individuals) would be impacted as determined by a qualified plant ecologist, MM BIO-1.3 shall be implemented.</p>	Project Applicant and Contractors	Prior to ground disturbance	Oversight of implementation by the City's Community and Economic Development Department, Planning Division	Review design for the proposed project to avoid impacts on all populations of special-status plants within the project footprints or within the identified buffers of the impact areas. Review the limits of the identified buffer around special-status plants to be avoided.	Once (if avoidance of impacts to special-status species plants is feasible). If complete avoidance of impacts to special status species and more than 10 percent of a population would be impacted as determined by a qualified plant ecologist, MM BIO-1.3 shall be implemented.
<p>MM BIO-1.3: Preserve and Manage Mitigation Populations of Special-Status Plants. If avoidance of special-status plants is not feasible and more than 10 percent of the population would be impacted, compensatory mitigation shall be provided via the preservation, enhancement, and management of occupied habitat for the species, or the creation and management of a new population. To</p>	Project Applicant and Contractors (including qualified plant ecologist)	Prior to ground disturbance (Preparation HMMP) During	Oversight of implementation by the City's Community and Economic Development	Review and approve HMMP developed by the qualified biologist restoration	Review HMMP (Once) Monitoring measures at the mitigation sites

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<p>compensate for impacts on special-status plants, habitat occupied by the affected species shall be preserved and managed in perpetuity at a minimum 1:1 mitigation ratio (at least one plant preserved for each plant impacted, and at least one occupied acre preserved for each occupied acre affected), for any impact over the 10 percent significance threshold. Alternately, seed from the population to be impacted may be harvested and used either to expand an existing population (by a similar number/occupied area to compensate for impacts to special-status plants beyond the 10 percent significance threshold) or establish an entirely new population in suitable habitat.</p> <p>Areas proposed to be preserved as compensatory mitigation for impacts to special-status plants must contain verified extant populations of the species, or in the event that enhancement of existing populations or establishment of a new population is selected, the area must contain suitable habitat for the species as identified by a qualified plant ecologist. Mitigation areas shall be managed in perpetuity to encourage persistence and even expansion of this species. Mitigation lands cannot be located on land that is currently held publicly for resource protection unless substantial enhancement of habitat quality will be achieved by the mitigation activities. The mitigation habitat shall be of equal or greater habitat quality compared to the impacted areas, as determined by a qualified plant ecologist, in terms of soil features, extent of disturbance, vegetation structure, and dominant species composition, and shall contain at least as many individuals of the species as are impacted by project activities. The permanent protection and management of mitigation lands shall be ensured through an appropriate</p>		<p>construction and project operations (monitoring measures at the compensatory mitigation site)</p>	<p>Department, Planning Division</p> <p>Approval of the HMMP by the U.S. Fish and Wildlife Service or California Department of Fish and Wildlife shall be required if the impacted plant species is listed under the Federal and/or California Endangered Species Act</p>	<p>ecologist</p> <p>Review areas proposed to be preserved as compensatory mitigation for impacts to special-status plant species</p> <p>Ensure permanent protection and management of mitigation lands through an appropriate mechanism, such as a conservation easement or fee title purchase.</p>	<p>(a minimum of 5 years for preserved special-status plan populations and a minimum of 10 years for enhanced or established populations)</p>

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<p>mechanism, such as a conservation easement or fee title purchase.</p> <p>A habitat mitigation and monitoring plan (HMMP) shall be developed by a qualified biologist or restoration ecologist and implemented for the mitigation lands on a project-by-project basis. Approval of the HMMP by the City U.S. Fish and Wildlife Service or California Department of Fish and Wildlife shall be required if the impacted plant species is listed under the Federal and/or California Endangered Species Act, and for non-listed species, approval by the City shall be required before project impacts occur to the species.</p> <p>The HMMP shall include, at a minimum, the following information:</p> <ul style="list-style-type: none"> • A summary of habitat impacts and the proposed mitigation; • A description of the location and boundaries of the mitigation site and description of existing site conditions; • A description of measures to be undertaken to enhance (e.g., through focused management that may include removal of invasive species in adjacent suitable but currently unoccupied habitat) the mitigation site for the species; • A description of measures to transplant individual plants or seeds from the impact area to the mitigation site, if appropriate (which will be determined by a qualified plant or restoration ecologist), as well as a requirement that any salvaging or transplanting of 					

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<p>plants occur in accordance with appropriate best management practices for minimizing the spread of plant pathogens (https://www.suddenoakdeath.org/welcome-to-calphytos-org-phytophthoras-in-native-habitats/resources/);</p> <ul style="list-style-type: none"> Proposed management activities to maintain high-quality habitat conditions for the species; A description of habitat and species monitoring measures on the mitigation site, including specific, objective final and performance criteria, monitoring methods, data analysis, reporting requirements, monitoring schedule, etc. At a minimum, performance criteria will include demonstration that any plant population fluctuations over the monitoring period of a minimum of 5 years for preserved populations and a minimum of 10 years for enhanced or established populations do not indicate a downward trajectory in terms of reduction in numbers and/or occupied area for the preserved mitigation population that can be attributed to management (i.e., that are not the result of local weather patterns, as determined by monitoring of a nearby reference population, or other factors unrelated to management); and Contingency measures for mitigation elements that do not meet performance criteria. 					
<p>MM BIO-2.1: Salt Marsh Harvest Mouse and Salt Marsh Wandering Shrew Minimization Measure. Any development projects, including the loop road or multi-use path, within 100 feet of an area identified as salt marsh, open water, or tidal slough shall be subject to a habitat assessment prepared by a</p>	<p>Project Applicant and Contractors (including a qualified</p>	<p>Habitat assessment prior to issuance of Planning permit</p>	<p>Oversight of implementation by the City’s Community and Economic</p>	<p>Review and approve the Habitat Assessment for projects within</p>	<p>Review Habitat Assessment (Once) Oversight of pre-construction and</p>

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<p>qualified biologist. All habitats identified by the biologist as suitable habitat for the salt marsh harvest mouse or salt marsh wandering shrew shall be avoided for development and preserved in their existing state, to the extent feasible. If avoidance of salt marsh habitats is infeasible, the following measures shall be implemented:</p> <ul style="list-style-type: none"> • Before any construction activities begin, a qualified biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include descriptions of the salt marsh harvest mouse and salt marsh wandering shrew, their habitats, the laws protecting them, the general measures that are being implemented to conserve the species as they relate to the project, and the boundaries within which the project may be accomplished. • To avoid the loss of individual harvest mice or shrews from any excavation, fill, or construction activities in suitable habitat, vegetation removal will be limited to the minimum amount necessary to permit the activity to occur. Wherever feasible, sufficient suitable habitat, as determined by a qualified biologist, will remain adjacent to the activity area to provide refugia for displaced individuals. • Within areas where vegetation potentially supporting salt marsh harvest mice or salt marsh wandering shrews will be impacted, vegetation and debris that could provide cover for mice will be removed using only hand tools (which may include motorized equipment such as line trimmers if the vegetation removed is inspected by a qualified biologist and does 	biologist)	<p>Training session prior to construction</p> <p>All other measures during construction</p>	<p>Development Department, Planning Division and in coordination with the Public Works Department.</p> <p>If the salt marsh harvest mouse or wandering shrew are discovered during vegetation removal/construction activities and will not move on its own, the biologist will confer with the US Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW) to identify appropriate measures to avoid impacts to the</p>	<p>100 feet of salt marsh, open water, or tidal slough prior to construction. Ensure measures to protect the salt marsh harvest mouse and wandering shrew are shown on approved construction plans and implemented prior to and during construction.</p>	<p>construction measures for the harvest mouse and wandering shrew (Throughout construction period)</p>

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<p>not contain any salt marsh harvest mice or salt marsh wandering shrews) at least one week prior to the commencement of construction activities. Vegetation removal will occur under the supervision of a qualified biologist. This vegetation will be removed on a progressive basis, such that the advancing front of vegetation removal moves toward vegetation that would not be disturbed. If necessary, temporary shelter consisting of dead vegetation may be positioned to provide escape routes to suitable habitat. A qualified biologist will monitor the vegetation removal and make specific recommendations with respect to the rate of vegetation removal (to ensure that any harvest mice or shrews present are able to escape to cover that will not be impacted), and whether vegetation needs to remain in a certain area temporarily to facilitate dispersal of mice into habitat outside the impact area.</p> <ul style="list-style-type: none"> • All cut vegetation, except cut vegetation left in place as escape cover, will be removed daily from vegetation removal areas to prevent it from being used as refugia by salt marsh harvest mice. • If a salt marsh harvest mouse or salt marsh wandering shrew, or an animal that may be a salt marsh harvest mouse or salt marsh wandering shrew, is detected during vegetation removal or other project activities, all work that could impact the individual will cease until the animal has moved out of the impact area on its own. A qualified biologist will monitor the animal to ensure that it disperses out of the impact area. If the animal will not move on its own, the biologist will confer with the US Fish and Wildlife Service (USFWS) 			animal.		

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<p>and California Department of Fish and Wildlife (CDFW) to identify appropriate measures to avoid impacts to the animal. No salt marsh harvest mice or salt marsh wandering shrews will be handled (even for relocation) without prior approval from the USFWS and CDFW.</p> <ul style="list-style-type: none"> • Following the hand-removal of vegetation, exclusion fencing will be erected as needed between construction areas and harvest mouse/shrew habitat that is to remain unimpacted to define and isolate protected harvest mouse/shrew habitat. This fencing will consist of material that cannot be climbed by harvest mice, buried at least 4 inches below the ground's surface, and with at least 1 ft (but no more than 4 ft) above the ground. All supports for the fencing will be placed on the inside of the work area. A minimum 2-ft buffer will be maintained free of vegetation around the outside of the exclusion fencing. The fencing will be inspected daily during construction, and any necessary repairs will be made within 24 hours of when they are found. If any breaks in the fencing are found, the qualified biologist will inspect the work area for salt marsh harvest mice and salt marsh wandering shrews. • During construction, a qualified biologist will be on-call to check underneath vehicles and equipment for salt marsh harvest mice and salt marsh wandering shrews before such equipment is moved, unless the equipment is surrounded by harvest mouse exclusion fencing. • No animals (e.g., dogs or cats) will be brought to the project site by project personnel to avoid harassment, 					

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<p>killing, or injuring of wildlife.</p> <ul style="list-style-type: none"> • The project site will be maintained trash-free, and food refuse will be contained in secure bins and removed daily during construction, to avoid attracting nuisance animals that may then prey on salt marsh harvest mice. • Nighttime work will be avoided if feasible. If avoidance of night work is infeasible, all project lighting will be shielded and directed away from tidal marshes. • Construction activities within 10 feet of the high tide line shall not occur within two hours before or after extreme high tides (6.5 feet or above, as measured at the Golden Gate Bridge and adjusted to the timing of local high tides), when the marsh plan is inundated, because protective cover for these species is limited and activities could prevent them from reaching available cover. • In either configuration, with or without the loop road, salt marsh and upland grassland habitats, which may be used for foraging and high-tide refugia by both species, would be located immediately adjacent to the new road and pathways. Therefore, dense upland ecotone/transitional salt marsh vegetation shall be planted along the immediate edge of the shoulder of the loop road or multi-use path adjacent to salt marsh and upland grassland habitats to provide high-tide refugia for both species. • In order to provide a barrier between transitional salt marsh and upland grassland habitats and the newly constructed loop road or multi-use path, and to discourage loop road/multi-use path users from 					

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<p>entering potential habitats used by salt marsh harvest mice and salt marsh wandering shrews, a low (less than three feet tall) symbolic fence or wall with educational signs prohibiting entry shall be placed along the edge of the developed area, between the developed area and the upland ecotone to be added as described above.</p>					
<p>MM BIO-2.2: Salt Marsh Harvest Mouse and Salt Marsh Wandering Shrew Compensatory Mitigation. Compensatory mitigation for individual project impacts, including the loop road or multi-use path, on the salt marsh harvest mouse and salt marsh wandering shrew habitat will be provided via the purchase of credits from a conservation bank or mitigation bank that has restored suitable salt marsh habitat for these species; project-specific mitigation via the preservation and management of suitable habitat for this species; or some combination of the two approaches. If no USFWS/CDFW-approved conservation banks specifically for these mammals are available, credits in a tidal wetland mitigation bank that provides suitable habitat for, and is expected to be occupied by, these species would be adequate. Compensatory mitigation shall be provided at a minimum ratio of 2:1 (mitigation to impact) on an acreage basis if project-specific mitigation is performed or 1:1 if credits are purchased from a mitigation or conservation bank. Compensatory mitigation shall be provided for any potentially suitable habitat for these species that is permanently lost to development or that is present within 50 feet of any new or higher-intensity lighting installed by Specific Plan activities.</p> <p>If project-specific mitigation is provided as compensatory mitigation, the applicant will engage a qualified plant or</p>	<p>Project Applicant and Contractors (including a qualified biologist)</p>	<p>Prior to ground disturbance (Preparation HMMP)</p> <p>During construction and project operations (monitoring measures at the compensatory mitigation site)</p>	<p>Oversight of implementation by the City's Community and Economic Development Department, Planning Division and in coordination with Public Works Department and Community Services Division</p>	<p>Review and approve HMMP developed by the qualified biologist restoration ecologist</p> <p>Review areas proposed to be preserved as compensatory mitigation for impacts to special-status status plant species</p> <p>Ensure permanent protection and management of</p>	<p>Review HMMP (Once)</p> <p>Compensatory measures until success criteria for the habitat and species are met (a minimum of 5 years)</p>

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<p>restoration ecologist to prepare an HMMP describing the measures that will be taken to create, restore, or enhance habitat for the salt marsh harvest mouse and salt marsh wandering shrew and monitor the effects of the mitigation on these species. The HMMP will include, at a minimum, the following:</p> <ul style="list-style-type: none"> • A summary of project impacts on the species and the proposed mitigation of these impacts; • A description of the location and boundaries of the mitigation site and description of existing site conditions; • A description of measures to be undertaken to enhance (e.g., through focused management) the mitigation site for the species; • Proposed management activities (e.g., management of invasive plants) to maintain high-quality habitat conditions for the species; • A description of community and species monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. At a minimum, success criteria shall include demonstration that habitat conditions are suitable for occupancy by the salt marsh harvest mouse and salt marsh wandering shrew, and that either a) at least one of these species is present, or b) the site is connected to pre-existing, suitable, and presumably occupied habitat so that colonization of the mitigation site is determined to be likely by a qualified biologist. 				mitigation lands through an appropriate mechanism, such as a conservation easement or fee title purchase.	

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<p>Monitoring will occur until these criteria are achieved but for no less than five years.</p> <ul style="list-style-type: none"> • A description of the HMMP's adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria; and • A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands. <p>The HMMP shall be prepared by a qualified plant or restoration ecologist. Approval of the HMMP by the City shall be required before project impacts occur to the species.</p>					
<p>MM BIO-2.3: Prohibit Rodenticides. The use of rodenticides shall not be allowed within 100 feet of any salt marsh habitat.</p>	<p>Project Applicant and Property Owners</p>	<p>Prior to issuance of Planning permit</p>	<p>Oversight of implementation by the City's Community and Economic Development Department, Planning Division and in coordination with the Public Works Department and Community Services Division.</p>	<p>Review project design of developments adjacent to the salt marsh habitat to determine if the project is subject to this measure, and if subject, Planning permit to include measures to prohibit the use of rodenticides within 100 feet</p>	<p>Prior to issuance of Planning permit </p>

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
				of the marsh habitat.	
<p>MM BIO-2.4: Restrict Pesticide Use in and near Salt Marsh Habitats. All pesticides used within 100 feet of salt marsh habitats must be utilized in accordance with the manufacturer’s directions, and pesticides shall not be stored, loaded, or mixed within 300 feet of any salt marsh or open water/tidal slough habitat unless the user's property is located entirely within 300 feet of those habitats (in which case off-site storage may be infeasible). No pesticides shall be applied within tidal marsh habitats as part of Specific Plan Update activities. Any pesticides used in areas where they could be washed, or could drift via wind, into tidal marsh habitat must be approved by the City of East Palo Alto for use in aquatic habitats.</p>	Project Applicant and Property Owners	Prior to issuance of Planning permit	Oversight of implementation by the City’s Community and Economic Development Department, Planning Division and in coordination with Public Works Department and Community Services Division	Review project design of developments adjacent to the salt marsh habitat to determine if the project is subject to this measure, and if subject, Planning permit to include measures to restrict pesticide use.	Once prior to issuance of Planning permit
<p>MM BIO-2.5: Raptor Perch Deterrents. Within 300 feet of any salt marsh habitats within or adjacent to the Specific Plan area, raptor perch deterrents will be placed on any edges of building roofs, terraces, or other structures (e.g., light poles or electrical towers) that are high enough to overlook the marsh and that have an unobstructed view to the marsh. The specific type of perch deterrent(s) used shall be approved by a qualified biologist and the City but shall not include flagging or other wind-activated materials, or any deterrents that include lights.</p>	Project Applicant and Contractors (including a qualified biologist)	Prior to Planning permit approval	Oversight of implementation by the City’s Community and Economic Development Department, Planning Division and Building Division and in coordination with	Review project design for developments within 300 feet of salt marsh habitats. Review and approve the types of perch deterrents	Review project design, including perch deterrent types, prior to issuance of Planning permit

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
			the Public Works Department and Community Services Division	recommended by the biologist.	
<p>MM BIO-2.6: Landscape Design. To avoid perches for avian predators and dense woody vegetation that could hide mammalian predators of salt marsh harvest mouse and salt marsh wandering shrew, new landscaping, as well as the size, location and species of any new or replacement public street trees, within 300 feet of salt marsh habitats shall be reviewed by a qualified biologist familiar with these species' ecology prior to City approval to ensure that no new landscaping poses a threat to these two mammals. Intervening structures, topography, and other features that may block the view of the tidal marsh from avian predators using proposed trees shall be considered by the biologist.</p>	Project Applicant and Contractors (including a qualified biologist)	Prior to Planning permit approval	Oversight of implementation by the City's Community and Economic Development Department, Planning Division and in coordination with the Public Works Department and Community Services Division	Review project design and landscaping plans for developments within 300 feet of salt marsh habitats.	Once prior to Planning permit approval
<p>MM BIO-2.7: Restrictions on Outdoor Cat Feeding Stations and Off-Leash Dogs. Future developments shall prohibit outdoor cat feeding stations within 300 feet of salt marsh habitats. Future developments shall also prohibit off-leash dogs within 100 feet of salt marsh habitats unless within fenced areas.</p>	Project Applicant and Project Owners	Prior to issuance of Planning permits and during project operations	Oversight of implementation by the City's Community and Economic Development Department, Planning Division	Review project design for developments within 300 feet of salt marsh habitat prior to Planning permit approval to ensure no	Review project design once prior to issuance of Planning permit

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
				<p>outdoor feeding stations are provided.</p> <p>Permit conditions to preclude outdoor feeding stations and off-leash dogs .</p>	
<p>MM BIO-2.8: Food Waste Management. The following measures shall be implemented by future developments within 100 feet of salt marsh habitats to reduce impacts on salt marsh harvest mice and salt marsh wandering shrews due to the attraction of nuisance predators:</p> <ul style="list-style-type: none"> • Any bins used for food waste shall include lids that seal tightly to prevent access by animals and incorporate a mechanism to prevent them from being inadvertently left open when not in active use. • Outdoor trash and recycling receptacles shall be emptied frequently enough that cans do not fill up and allow food waste to spill out. Any observations of overflowing or non-functioning trash bins shall be reported to those responsible for emptying the bins, and to the City, to ensure that they are emptied when necessary. • Litter on the site shall be picked up daily, and no food trash is left on-site overnight. • Signs shall be placed on trash and recycling receptacles reminding users to close the lids so that 	Project Applicants and Project Owners	Prior to Planning permit approval, building occupancy and during project operations	Oversight of implementation by the City’s Community and Economic Development Department, Planning Division	<p>Review project design for developments within 100 feet of salt marsh habitat prior to Planning permit approval.</p> <p>Ensure educational signs prohibiting feeding wildlife and feral animals on the property, prohibiting off-leash dogs, and advising residents and visitors to</p>	<p>Review of project design (once prior to Planning permit approval)</p> <p>Ensure educational signs are posted (once prior to building occupancy)</p>

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>they will not be inadvertently left open.</p> <ul style="list-style-type: none"> Residents and visitors shall be prohibited from feeding feral or wild mammals. Educational signs shall be posted explaining the importance and sensitivity of nearby marsh habitats, prohibiting feeding wildlife and feral animals on the property, prohibiting off-leash dogs, and advising residents and visitors to dispose of food waste in outdoor areas appropriately to avoid attracting and subsidizing nuisance species. 				dispose of food waste in outdoor areas appropriately to avoid attracting and subsidizing nuisance species are posted.	
<p>Impact BIO-3: Future project construction could result in the loss of California black rail and/or California Ridgway's rail populations and their habitats, which would constitute a significant impact. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM BIO-3.1: Seasonal Avoidance or Protocol-level Surveys and Buffers around Calling Centers. The mitigation measures described below may be modified or substituted with equivalent mitigation that achieves the same or greater reduction of impacts, if approved in writing by the City and applicable regulatory agencies.</p> <p>To avoid causing the abandonment of an active California Ridgway's rail or California black rail nest, independent project activities within 700 feet of salt marsh habitats within or adjacent to the Specific Plan area will be avoided during the rail breeding season (from February 1 through August 31) unless 1) a qualified biologist in coordination with USFWS and CDFW determines that a reduced buffer (but no less than 200 feet) is appropriate due to intervening development or obstructions, the level of disturbance by the activity (in terms of noise and equipment), or other factors that would reduce the potential for the activity to disturb nesting rails, or 2)</p>	Project Applicant and Contractors (including a qualified biologist)	Prior to issuance of a grading or building permit for construction occurring during the rail breeding season	Oversight of implementation by the City's Community and Economic Development Department, Planning Division USFWS and CDFW if construction within the 700 foot buffer from the salt marsh habitat occurs during breeding	Review protocol-level surveys to confirm construction buffer area from salt marsh habitat for the Ridgway's rail and black rail. If rails are discovered, review and approve buffer areas between the calling centers.	Once to review protocol-level surveys to establish buffer area from salt marsh habitat

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>protocol-level surveys are conducted by a qualified biologist to determine rail locations and territories during the year in which construction is initiated. Protocol-level surveys are typically initiated in late January, so proactive planning is necessary to ensure that such surveys are conducted according to the protocol during the year in which construction occurs.</p> <p>If breeding rails are determined to be present, construction activities shall not occur within 700 feet of an identified California Ridgway’s rail calling center or within 300 feet of a California black rail calling center during the breeding season unless the USFWS and CDFW provide guidance regarding the types of activities that may occur within lesser distances from calling centers, in which case USFWS and CDFW guidance shall be followed.</p>			<p>season or if construction will occur within 700 feet of a California Ridgway’s rail calling center or 300 feet of a black rail’s calling center during breeding season.</p>		
<p>Impact BIO-4: Future projects’ construction activities that occur in or near the tidal salt marsh, open water, or tidal slough habitats, could result in significant impacts to special-status species fish. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM BIO-4.1: Worker Environmental Awareness Training. Personnel working on projects within or adjacent to salt marsh, open water, or tidal slough habitats shall be trained by a qualified biologist in the importance of the marine environment to special-status fish and other aquatic animals and plants, and the environmental protection measures put in place to prevent impacts to these species, their habitats, and essential fish habitat (EFH). The training session shall include the information described in MM BIO-2.1, as well as the</p>	<p>Project Applicant and Contractors (including a qualified biologist)</p>	<p>Prior to construction</p>	<p>Oversight of implementation by the City’s Community and Economic Development Department, Planning Division,</p>	<p>Project applicant to provide documentation of a contract with a qualified biologist to complete worker awareness</p>	<p>Once prior to issuance of grading or building permit.</p>

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>following:</p> <ul style="list-style-type: none"> • A review of the special-status fish, other aquatic animals and plants, and sensitive habitats that could be found in or near the work areas; • Measures to avoid and minimize adverse effects to special-status fish, other aquatic animals and plants, their habitats, and EFH; and • A review of all conditions and requirements of environmental permits, reports, and plans (e.g., USACE permits). 			Building Division and Public Works Department	training	
<p>MM BIO-4.2: Water Quality Protection. During construction, the project applicant shall employ standard construction best management practices (BMPs) to protect water quality. These BMPs may include but are not limited to the following:</p> <ul style="list-style-type: none"> • Sediment mitigation measures shall be in place prior to the onset of project construction and shall be monitored and maintained until construction activities have been completed. Temporary stockpiling of excavated or imported material shall occur only in approved construction staging areas. Stockpiles that are to remain on the site throughout the wet season shall be protected to prevent erosion. • No litter, debris, or sediment shall be dumped into storm drains. Daily trash and debris removal shall occur at the site. • All litter and construction debris shall be disposed of off-site in accordance with state and local regulations. All trash and debris within the work area shall be placed in containers with secure lids before the end of 	Project Applicant and Contractors	During construction	Oversight of implementation by the City’s Community and Economic Development Department, Planning Division, Building Division and Public Works Department.	Confirm construction BMPs to protect water quality are included on the project applicant’s construction plans	Once prior to issuance of grading or building permit.

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>work each day in order to reduce the likelihood of predators being attracted to the site by discarded food wrappers and other rubbish that may be left on-site. If containers meeting these criteria are not available, all rubbish shall be removed from the project site at the end of each work day.</p> <ul style="list-style-type: none"> • Equipment staging and parking of vehicles shall occur on established access roads and flat surfaces. • The integrity and effectiveness of construction fencing and erosion control measures shall be inspected on a daily basis. Corrective actions and repairs shall be carried out immediately for fence breaches and ineffective BMPs. • Fueling, washing, and maintenance of vehicles shall occur in developed habitat, away from all tidal salt marsh, open water, and tidal slough habitats. Equipment shall be regularly maintained to avoid fuel leaks. Any leaks shall be captured in containers until equipment is moved to a repair location. Hazardous materials shall be stored only within the developed habitat. Containment and cleanup plans shall be prepared and put in place for immediate cleanup of fluid or hazardous materials spills. • Absorbent materials designated for spill containment and clean-up activities shall be available on project sites for use in an accidental spill. • At no time shall sediment-laden water be allowed to enter the salt marsh, open water, or tidal slough habitats. 					

Impact BIO-5: Future projects' construction activities that occur in proximity to active burrows could result in the injury or loss of burrowing owls, resulting in a

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>prior to the start of construction activities.</p> <ul style="list-style-type: none"> Implement Buffer Zones for Burrowing Owls. If burrowing owls are detected during the pre-activity survey, a 165-foot buffer, within which no newly initiated construction-related activities should occur, will be maintained between construction activities and occupied burrows to the extent feasible during the nonbreeding season (September 1 through January 31). This buffer may be reduced if a qualified biologist determines that work will not result in damage to the burrow(s) being used by the owls. Though the species is highly unlikely to breed in the Specific Plan area, owls present between February 1 and August 31 will be assumed to be nesting, and a 250-foot protected area will remain in effect until August 31, or until the burrow is no longer occupied, whichever occurs first. Passive Relocation. No burrowing owls shall be relocated from burrows during the breeding season (February 1 through August 31). If, during the nonbreeding season (September 1 through January 31), it is infeasible to maintain a buffer around occupied burrow(s) large enough to ensure that the burrow(s) will not be physically disturbed (thus risking injury or mortality of the owl), the owl may be passively relocated from the occupied burrow(s) using one-way doors. Passive relocation shall be performed only by a qualified biologist. One-way doors must be in place for a minimum of 48 hours, during dry conditions, to ensure that owls have left the burrow 					

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
before the burrow is impacted.					
Impact BIO-6: Future project activities in the northwest corner of the Specific Plan area occur within 600 feet of active nests, construction activities could result in the abandonment of nests, and possibly the loss of eggs or young western snowy plover, resulting in a significant impact to these species. (Less than Significant Impact with Mitigation Incorporated)					
MM BIO-6.1: Seasonal Avoidance and Buffers. No Specific Plan Update construction activities shall be performed within 600 feet of an active snowy plover nest during the snowy plover breeding season, March 1 through September 14. Prior to the initiation of any activities within 300 feet of the southwest corner of Pond SF 2, north of the Specific Plan area during the period March 1 through September 14, a qualified biologist shall conduct a survey for suitable habitat for nesting snowy plovers, and for active nests. If no suitable nesting habitat or active nests are present within 600 feet of the proposed activity, construction may proceed. If an active nest is present, no construction activities shall commence within 600 feet of the nest until the nest is no longer active.	Project Applicant and Contractors (including a qualified biologist) for sites within 600 feet of active nest	Prior to construction activities occurring March 1 through September 14	Oversight of implementation by the City's Community and Economic Development Department, Planning Division and Building Division.	Review preconstruction survey results	Review preconstruction surveys once.
Impact BIO-7: Construction disturbance during the bird nesting season (typically February 1 through August 31) could result in the incidental loss of eggs or nestlings of native birds, either directly through the destruction or disturbance of active nests or indirectly by causing enough disturbance to result adult birds abandoning their nests. (Less than Significant Impact with Mitigation Incorporated)					
<p>MM BIO-7.1: To minimize impacts on nesting birds, the following shall be implemented:</p> <ul style="list-style-type: none"> • Seasonal Avoidance and Buffers. To the extent feasible, vegetation removal, demolition, and initiation of grading and other construction activities should be scheduled to avoid the nesting season. If such activities take place outside the nesting season, all impacts on nesting birds protected under the 	Project Applicant and Contractors (including a qualified biologist)	Prior to construction occurring during February 1 through August 31	Oversight of implementation by the City's Community and Economic Development Department, Planning Division	Review preconstruction survey results Review construction buffer areas from suitable	Review preconstruction surveys once. Review construction buffer areas prior to

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>MBTA and California Fish and Game code will be avoided. The nesting season for most birds in San Mateo County extends from February 1 through August 31.</p> <ul style="list-style-type: none"> Preconstruction/Pre-disturbance Surveys. If it is not possible to schedule vegetation removal, demolition, and construction activities between September 1 and January 31, then preconstruction surveys for nesting birds shall be conducted by a qualified biologist to ensure that no nests of migratory birds will be disturbed during project implementation. These surveys shall be conducted no more than seven days prior to the initiation of tree removal, demolition, ground disturbance, or construction activities for each construction phase. During this survey, the biologist shall inspect all potential nesting habitats (e.g., trees, shrubs, buildings, electrical towers, and the ground) in and immediately adjacent to the impact areas for migratory bird nests. Buffers. If an active nest is found within areas that would be disturbed by project activities, the qualified biologist shall determine the extent of a construction-free buffer zone to be established around the nest (typically 300 feet for raptors and 100 feet for other species, though buffers may be reduced by the biologist based on intervening structures or vegetation, the magnitude of disturbance produced by the activity, and the level of human activity to which the birds are already habituated), to ensure that no active nests of species protected by the MBTA 			and in coordination with the Building Division.	nesting bird habitat	preconstruction survey once

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>and California Fish and Game Code will be disturbed during project implementation.</p> <ul style="list-style-type: none"> • Inhibition of Nesting. If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1) to reduce the potential for establishment of nests in areas to be disturbed. 					
<p>Impact BIO-8: Increased lighting from future development adjacent to sensitive habitats could result in a significant impact on wildlife such as indirectly increasing predation and bird collisions. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM BIO-8.1: Exterior lighting shall be minimized (e.g., by turning lights off) in accordance with recommendations from the International Dark-Sky Association from midnight until dawn, at a minimum, except as needed for safety and City code compliance. Exterior lighting within the Specific Plan area shall be shielded to block illumination from shining upward or outward into the sensitive habitats (i.e., salt marshes) within and adjacent to the Specific Plan area. Uplighting shall be avoided.</p> <p>MM BIO-8.2: Spillage of lighting from building interiors shall be minimized using occupancy sensors, dimmers, blinds, or other mechanisms from midnight until dawn, at a minimum, during migration seasons (February through May and August through November).</p>	<p>Project Applicant and Contractors </p>	<p>Prior to issuance of building permits and building occupancy</p>	<p>Oversight of implementation by the City's Community and Economic Development Department, Planning Division and Building Division</p>	<p>Ensure that lighting standards are included on the project applicant's plans</p> <p>Inspect building lighting and sensors</p>	<p>Review applicant's plans prior to issuance of building permits.</p> <p>Inspect building lighting and sensors once, prior to building occupancy.</p>
<p>Impact BIO-9: Construction and operation of future development would result in soil disturbance adjacent to sensitive salt marsh and tidal slough habitats</p>					

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
which could result in the spread of non-native plant species in wetland areas in and adjacent to the Specific Plan area. (Less than Significant Impact with Mitigation Incorporated)					
<p>MM BIO-9.1: Implement Invasive Weed Best Management Practices (BMPs). The invasion and/or spread of noxious weeds will be avoided by the use of the following invasive weed BMPs:</p> <ul style="list-style-type: none"> • Prohibit the use of moderate or highly invasive and/or noxious weed (as defined by California Department of Food and Agriculture and California Invasive Plant Council) for landscaping. • During project construction, all seeds and straw materials used in the Specific Plan area shall be certified weed-free rice (or similar material acceptable to the City) straw, and all gravel and fill material will be certified weed-free to the satisfaction of the City. Any deviation from this will be approved by the City. • During project construction within, or within 100 feet of, tidal salt marsh, open water, or tidal slough habitats, vehicles and all equipment shall be washed (including wheels, undercarriages, and bumpers) before and after entering the proposed project footprint. Vehicles will be cleaned at existing construction yards or car washes. • Following construction of project, a standard erosion control seed mix (acceptable to the City) from a local source, and free of invasive species, will be planted within the temporary impact zones on any disturbed ground that will not be under hardscape, landscaped, or maintained. This will minimize the potential for the germination of the majority of seeds from nonnative, invasive plant species. 	Project Applicant and Contractors	During and post-construction	Oversight of implementation by the City's Community and Economic Development Department, Planning Division and the Public Works Department	Include BMPs on project construction and landscaping plans. Planning Permit to include condition prohibiting landscaping blowers within 100 feet of salt marsh	Review plans prior to issuance of grading or building permit.

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<ul style="list-style-type: none"> To avoid mobilizing weed seeds, use of landscaping blowers within 100 feet of the edge of salt marsh is prohibited. 					
Impact BIO-10: Future projects adjacent to the salt marsh habitat could result in a significant impact to jurisdictional waters of the state or U.S. habitat. (Less than Significant Impact with Mitigation Incorporated)					
<p>MM BIO-10.1: Jurisdictional Waters Avoidance and Minimization Measures. The following measures will be implemented to avoid and minimize impacts to jurisdictional waters to less than significant levels.</p> <ul style="list-style-type: none"> During or prior to project design, a wetland delineation of the project area shall be conducted to determine precise boundaries of jurisdictional wetlands and other waters. Impacts to any jurisdictional habitats shall be avoided to the extent practicable. If wetlands or other waters under state or federal jurisdiction occur in the construction areas and involve the placement of fill or dredged materials or other alteration, the necessary and appropriate permits and approvals from responsible resource agencies shall be secured. As appropriate for the type of permit to be considered, options that avoid, minimize, or mitigate potential impacts on jurisdictional wetlands shall be evaluated. Conditions of approval attached to the permits shall be followed. Sensitive habitat areas including wetlands adjacent to, but outside of, the construction area shall be demarcated with orange construction fencing to exclude workers, vehicles, and equipment. The locations of habitats to be avoided shall be identified in the contract documents (plans and 	Project Applicant and Contractors (including a qualified biologist)	During or prior to project design and during project construction	Oversight of implementation by the City’s Community and Economic Development Department, Planning Division U.S. Army Corps or Regional Water Quality Control Board for jurisdictional waters	Review results of the wetland delineation prior to issuance of Planning permit. Ensure construction measures are included on the project applicant’s grading and construction plans. Restoration plan prepared by a qualified biologist and approved by the City	Review results of the wetland delineation once prior to Planning permit. Ensure construction measures are included on the project applicant’s site plans prior to issuance of grading or building permit. Restoration plan approved by the City prior to grading or building permit

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>specifications) as “Sensitive Biological Resources – Do Not Disturb.”</p> <ul style="list-style-type: none"> • Jack-and-bore or other trenchless methods shall be used as feasible to reduce the need for surface construction within identified sensitive habitats and exclusion zones, and construction activities and vehicles shall be restricted to a specified right-of-way. • Temporarily impacted wetlands and other waters shall be restored in place based on a restoration plan prepared by a qualified biologist and approved by the City. • Where possible, trenches shall be worked from only one side to minimize impacts on adjacent habitat. • Watering of exposed earth shall be conducted consistent with construction BMPs to minimize dust production. • Trench lines shall be reseeded with native vegetation appropriate for the affected habitat type, and/or a double-trenching technique shall be used through sensitive habitats to help preserve the existing seedbank. • Any imported fill within wetlands shall be clean with no pathogens or weed seeds. When seed mixes are applied to wetlands, only specialized mixes with locally collected seed from coastal salt marsh plant species that occur in the habitat shall be utilized. 					
<p>MM BIO-10.2: Jurisdictional Waters Compensatory Mitigation. If impacts to jurisdictional wetlands or other waters cannot be avoided, compensatory mitigation shall be provided as follows (or as otherwise required by conditions of</p>	Project Applicant and Contractors (including a	Prior to issuance of grading permit or building permit (Preparation	Oversight of implementation by the City’s Community and	Review and approve HMMP developed by the qualified	Review HMMP (Once) Until success

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>applicable resource agency permits) to reduce impacts to less than significant impacts.</p> <ul style="list-style-type: none"> Compensatory mitigation shall be provided via the purchase of credits from a wetland mitigation bank; project-specific mitigation via the creation or restoration of the same general type of wetlands/waters impacted; or some combination of the two approaches. Compensatory mitigation shall be provided at a minimum ratio of 2:1 (mitigation: impact) on an acreage basis if project-specific mitigation is performed or 1:1 if credits are purchased from a mitigation bank. Mitigation performed for loss of salt marsh harvest mouse and salt marsh wandering shrew habitat, as described in MM BIO-2.2, may be adequate compensation for impacts to jurisdictional waters if performed via purchase of credits in a wetland mitigation bank and/or creation of suitable wetlands as described in the following bullet point. If project-specific mitigation is provided as compensatory mitigation, a qualified biologist will prepare an HMMP describing the measures that will be taken to create, restore, or enhance appropriate habitats and to monitor mitigation success. The HMMP will include, at a minimum, the following: <ul style="list-style-type: none"> A summary of project impacts on jurisdictional habitats and the proposed mitigation of these impacts; A description of the location and boundaries of the mitigation site and a description of existing mitigation site conditions; 	<p>qualified biologist)</p>	<p>HMMP and purchase of credits)</p> <p>During construction and project operations (monitoring measures at the compensatory mitigation site)</p>	<p>Economic Development Department, Planning Division</p> <p>U.S. Army Corps or Regional Water Quality Control Board</p>	<p>biologist restoration ecologist</p> <p>Review areas proposed to be preserved as compensatory mitigation for impacts to special-status plant species</p> <p>Ensure permanent protection and management of mitigation lands through an appropriate mechanism, such as a conservation easement or fee title purchase.</p>	<p>criteria for the habitat and species are met (a minimum of 5 years)</p>

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<ul style="list-style-type: none"> • A description of measures to be undertaken, if necessary, to create, restore, or enhance appropriate habitats; • Proposed management activities, such as management of invasive plants, to maintain high-quality habitat conditions; • A description of community monitoring measures on the mitigation site, including specific, objective goals and objectives, performance indicators, success criteria, monitoring methods, data analysis, reporting requirements, and monitoring schedule. At a minimum, success criteria will include demonstration of at least 75 percent cover by native wetland plants within the mitigation area. Monitoring shall occur until these criteria are achieved but for no less than five years; • A description of the HMMP’s adaptive component, including potential contingency measures for mitigation elements that do not meet performance criteria; and • A description of the funding mechanism to ensure the long-term maintenance and monitoring of the mitigation lands. <p>The HMMP will be approved by the City and any agencies involved in issuing permits for the specific project in question (e.g., USACE and RWQCB) prior to the initiation of impacts to jurisdictional wetlands or other waters.</p>					
Impact BIO-11: Construction of multi-use trail would impede wildlife movement along the upland/tidal marsh interface on the eastern edge of the Specific Plan					

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
area. (Less than Significant Impact with Mitigation Incorporated)					
Implementation of the above Mitigation Measure MM BIO-2.1 (including restoration of ecotone vegetation on the marsh side of the multi-use trail) and Mitigation Measures MM BIO-8.1 and MM BIO-8.2 (to minimize lighting impacts) would mitigate the impacts of the multi-use trail on wildlife movement to less than significant levels.	See above Mitigation Measures MM BIO-2.1, MM BIO-8.1 and MM BIO-8.2				
GEOLOGY AND SOILS					
Impact GEO-1: Future projects under the Specific Plan Update could directly or indirectly cause substantial adverse effects related to strong seismic ground shaking and seismic-related ground failure. (Less than Significant Impact with Mitigation Incorporated)					
<p>MM GEO-1: All structures shall be designed using sound engineering judgment and the latest California Building Code (CBC) requirements as a minimum. Seismic design provisions of current building codes generally prescribe minimum lateral forces, applied statically to the structure, combined with the gravity forces of dead and live loads. The code-prescribed lateral forces are generally substantially smaller than the expected peak forces that would be associated with a major earthquake. Therefore, structures shall be able to do all of the following:</p> <ul style="list-style-type: none"> • Resist minor earthquakes without damage. • Resist moderate earthquakes without structural damage but with some nonstructural damage. • Resist major earthquakes without collapse but with some structural as well as nonstructural damage. 	Project Applicant and Contractors	Prior to issuance of a grading or building permit	Oversight of implementation by the City’s Community and Economic Development Department, Building Division	Review project design to confirm project is in compliance with the seismic design provisions in the CBC	Once prior to issuance of a grading or building permit

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
Impact GEO-2: Future projects under the Specific Plan Update could directly or indirectly cause substantial adverse effects related to liquefaction. (Less than Significant Impact with Mitigation Incorporated)					
MM GEO-2: Foundations shall be designed to compensate for effects of liquefaction, differential settlement, and lateral spreading due to earthquakes. Foundations shall be designed by a qualified structural engineer using soil design parameters developed by qualified geotechnical consultants and verified by the City’s Building Services Division.	Project Applicant and Contractors (including qualified Geotechnical Consultants and Structural Engineers)	Prior to issuance of a grading or building permit	Oversight of implementation by the City’s Community and Economic Development Department, Building Division	Review project design and geotechnical/ structural engineering consultant reports to confirm foundations are in compliance with the soil design parameters developed by qualified geotechnical consultants	Once prior to issuance of a grading or building permit
Impact GEO-3: Future development adjacent to the San Francisco Bay could result in a significant impact related to lateral spreading. (Less than Significant Impact with Mitigation Incorporated)					
MM GEO-3: Implement Mitigation Measure GEO-1 above. In addition, site development plans and foundations shall be designed to compensate for effects of lateral spreading due to earthquakes. Earthwork activities, including remedial grading, shall be performed using the recommendations provided by qualified geotechnical consultants, and foundations shall be designed by a qualified structural engineers using soil design	Project Applicant and Contractors (including qualified Geotechnical Consultants and	Prior to issuance of a grading or building permit	Oversight of implementation by the City’s Community and Economic Development Department,	Review project design and geotechnical/ structural engineering consultant reports to	Once prior to issuance of a grading or building permit

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
parameters developed by qualified geotechnical consultants and verified by the City's Building Services Division.	Structural Engineers)		Building Division	confirm foundations are designed to compensate for effects of seismically induced lateral spreading	
Impact GEO-4: Future development on existing Bay Mud deposits and fills could result in significant vertical movement and differential settlement. (Less than Significant Impact with Mitigation Incorporated)					
MM GEO-4: Improvements on areas of soft Bay Mud and artificial fill must be designed under the guidance of suitably qualified geotechnical consultants to ensure that the underlying substrate is capable of withstanding the load. Existing fills may need to be removed and replaced with engineered fills.	Project Applicant and Contractors (including qualified Geotechnical Consultants)	Prior to issuance of a grading or building permit	Oversight of implementation by the City's Community and Economic Development Department, Building Division	Review project design and reports prepared by geotechnical consultants to confirm improvements on areas with Bay Mud and artificial fill are capable of withstanding the load.	Once prior to issuance of a grading or building permit
Impact GEO-5: Future development on the existing expansive soils could result in resulting in heaving and cracking of building foundations. (Less than Significant Impact with Mitigation Incorporated)					
MM GEO-5: Earthwork and foundations shall be designed to compensate for effects of expansive soils. Fill placement and	Project Applicant and	Prior to issuance of a grading or	Oversight of implementation	Review project design and	Once prior to issuance of a

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>foundation design criteria shall be developed by qualified geotechnical consultants and verified by the City’s Building Services Division.</p>	<p>Contractors (including qualified Geotechnical Consultants)</p>	<p>building permit</p>	<p>by the City’s Community and Economic Development Department, Building Division</p>	<p>reports prepared by geotechnical consultant to confirm earthwork and foundations are design to compensate for the effects of expansive soils.</p>	<p>grading building permit</p>
<p>Impact GEO-6: Future projects could encounter paleontological resources during construction, resulting in the destruction of these resources. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM GEO-6: If paleontological resources are encountered during grading or excavation, all construction activities within 50 feet shall stop and the City shall be notified. A qualified paleontologist shall inspect the findings within 24 hours of discovery. If it is determined that the proposed development could damage unique paleontological resources, mitigation shall be implemented in accordance with Public Resources Code Section 21083.2 and Section 15126.4 of the CEQA Guidelines. Possible mitigation under Public Resources Code Section 21083.2 requires that reasonable efforts be made for resources to be preserved in place or left undisturbed. If preservation in place is not feasible, project applicants shall pay in-lieu fees to mitigate significant effects. Excavation as mitigation shall be limited to those parts of resources that would be damaged or destroyed by a project. Possible mitigation under CEQA emphasizes preservation-in-place measures, including planning construction avoid paleontological sites, incorporating sites into parks and other</p>	<p>Project Applicant and Contractors (including a qualified Paleontologist)</p>	<p>During construction</p>	<p>Oversight of implementation by the City’s Community and Economic Development Department, Planning Division</p>	<p>Approve mitigation measures from paleontologist retained by project applicant if paleontological resources are encountered during grading or excavation</p>	<p>When resources are encountered</p>

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
open spaces, covering sites with stable soil, and deeding the site into a permanent conservation easement. Under CEQA Guidelines, when preservation in place is not feasible, data recovery through excavation shall be conducted with a data recovery plan in place. Therefore, when considering these possible mitigations, the City shall have a preference for preservation in place.				Determine appropriate mitigation and/or data recovery if necessary	
NOISE AND VIBRATION					
Impact NOI-1: Future projects within 500 feet of residential land uses and 200 feet of commercial land uses could result in significant temporary noise impacts to these receptors. (Less than Significant Impact with Mitigation Incorporated)					
<p>MM NOI-1.1: Prior to the issuance of future developments' grading permits, a typical construction noise logistics plan would include, but not be limited to, the following measures to reduce construction noise levels as low as practical:</p> <ul style="list-style-type: none"> • Limit construction activity to weekdays between 7:00 a.m. and 7:00 p.m. and Saturdays and holidays between 9:00 a.m. and 7:00 p.m., with no construction on Sundays; • Limit combined construction noise levels (levels from all construction equipment used per phase) to an hourly average of 80 dBA Leq for residential receptors and to an hourly average of 90 dBA Leq for commercial receptors; • Utilize "quiet" models of air compressors and other stationary noise sources where such technology exists; 	Project Applicant and Contractors	<p>Prepare Noise Logistics Plan prior to issuance of grading and/or demolition permits</p> <p>Implement measures during construction</p>	Oversight of implementation by the City's Community and Economic Development Department, Planning Division and Public Works Department	<p>Review and verify construction noise logistics plan includes required measures to reduce construction noise logistics plan to less than significant levels.</p> <p>Ensure all measures are printed on the project</p>	Prior to grading and building permit issuance, and as needed during construction

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<ul style="list-style-type: none"> • Equip all internal combustion engine-driven equipment with mufflers, which are in good condition and appropriate for the equipment; • Locate all stationary noise-generating equipment, such as air compressors and portable power generators, as far away as possible from adjacent land uses; • Locate staging areas and construction material areas as far away as possible from adjacent land uses; • Prohibit all unnecessary idling of internal combustion engines; • If impact pile driving is proposed, multiple-pile drivers shall be considered to expedite construction. Although noise levels generated by multiple pile drivers would be higher than the noise generated by a single pile driver, the total duration of pile driving activities would be reduced; • If impact pile driving is proposed, temporary noise control blanket barriers shall shroud pile drivers or be erected in a manner to shield the adjacent land uses. Such noise control blanket barriers can be rented and quickly erected; • If impact pile driving is proposed, foundation pile holes shall be pre-drilled to minimize the number of impacts required to seat the pile. Pre-drilling foundation pile holes is a standard construction noise control technique. Pre-drilling reduces the number of 				construction plans prior to issuance of permits.	

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>blows required to seat the pile. Notify all adjacent land uses of the construction schedule in writing;</p> <ul style="list-style-type: none"> Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem are implemented. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction. 					
<p>Impact NOI-2: Traffic noise levels would result in an increase of three dBA CNEL or more at two roadway segments on Bay Road when 2040 cumulative plus project scenarios are compared to existing conditions and would increase noise levels by one dBA CNEL over cumulative no project conditions, resulting in a significant increase in permanent noise levels. (Less than Significant Impact with Mitigation Incorporated)</p>					
<p>MM NOI-2.1: Future development projects under the Specific Plan Update shall pay a fair share contribution toward the City's installation of quieter pavement types, at Bay Road segments from University Avenue to Clark Avenue and Clark Avenue to Pulgas Avenue, such as Open-Grade Rubberized Asphaltic Concrete or a New Rubberized Asphalt Concrete which would reduce noise levels by five (5) dBA or more from future conditions (assuming the affected segments are repaved every 10 years). Future development projects that contribute traffic to the affected segments of Bay Road shall pay a one-time fair share contribution toward the repaving of the two Bay Road segments.</p>	<p>Project applicant and contractors and City</p>	<p>Fair share contribution prior to issuance of building permit.</p> <p>City to install quieter pavement prior to approving 60% of the development allowed under the</p>	<p>Oversight of implementation by the City's Public Works Department in coordination with the Community and Economic Development Department, Planning Division</p>	<p>City to collect fair share contribution from project applicant</p> <p>City to install quieter pavement</p>	<p>Collect fair share contribution from project applicant once prior to building permit</p> <p>City to track implementation of the Plan Update to ensure pavement</p>

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
		Plan Update			installed prior to roadway noise impact
Impact NOI-3: Future development’s operational mechanical equipment could result in noise levels that exceed exterior noise levels at noise-sensitive receptors identified in Section 8.52.030 in the City’s Municipal Code. (Less than Significant Impact with Mitigation Incorporated)					
MM NOI-3.1: Future development projects within the Specific Plan area shall retain a qualified acoustical consultant to review mechanical equipment systems during final design of their proposed project consistent with standard City practice. The qualified acoustical consultant shall review selected equipment and determine specific noise reduction measures necessary to reduce noise to comply with the City’s noise level requirements set forth in Section 8.52.320 of the City’s Municipal Code. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers, such as enclosures and parapet walls, to block the line-of-sight between the noise source and the nearest receptors. Additionally, enclosures and interior wall treatments shall be considered to reduce noise exposure within the on-site units. Alternate measures may include locating equipment in less noise-sensitive areas, where feasible.	Project Applicant and Contractors (including a qualified acoustical consultant)	Prior to issuance of a building permit	Oversight of implementation by the City’s Community and Economic Development Department, Planning Division and Building Division.	Review mechanical equipment systems noise reduction measures prepared by qualified acoustical consultant	Once prior to the issuance of a building permit
Impact NOI-4: Future construction activities could result in groundborne vibration levels exceeding 0.3 in/sec PPV limit at nonhistorical buildings, which would result in a significant vibration impact. (Less than Significant Impact with Mitigation Incorporated)					
MM NOI-4.1: To address potential impacts related to vibration, the project will implement the following vibration controls in addition to the measures included in Policy 7.11 of the City’s General Plan:	Project Applicant and Contractors	Prepare Construction Vibration Monitoring Plan	Oversight of implementation by the City’s Community and	Review and verify construction vibration noise	Once at permit approval, and as needed during construction

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<ul style="list-style-type: none"> • Comply with the construction noise ordinance to limit hours of exposure. The City’s Municipal Code allows construction activities between the hours 7:00 a.m. and 6:00 p.m. on weekdays and between 7:00 a.m. and 5:00 p.m. on Saturdays. Construction activity is not permitted on Sundays or national holidays. • Prohibit the use of heavy vibration-generating construction equipment within 25 feet of residences. Use a smaller vibratory roller, such as the Caterpillar model CP433E vibratory compactor, when compacting materials within 25 feet of residences adjoining the site. • Avoid dropping heavy equipment within 25 feet of residences. Use alternative methods for breaking up existing pavement, such as a pavement grinder, instead of dropping heavy objects within 25 feet of residences adjoining the site. • The contractor shall alert heavy equipment operators to the close proximity of the adjacent structures so they can exercise extra care. • For projects requiring impact or vibratory pile driving, a Construction Vibration Monitoring, Treatment, and Reporting Plan shall be implemented to document conditions prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. The construction vibration monitoring plan shall include, but not be limited to, the following measures: <ul style="list-style-type: none"> • Document conditions at all structures located within 90 feet of pile driving activities and at 		<p>prior to issuance of grading, building and/or demolition permits</p> <p>Implement measures during construction, including vibration monitoring and construction contingency plan</p> <p>Conduct a post-construction survey</p>	<p>Economic Development Department, Planning Division and Building Division.</p>	<p>controls would reduce impacts to less than significant</p> <p>Ensure all measures will be printed on the project plans prior to issuance of grading, building, and/or demolition permits.</p> <p>Review and approve vibration monitoring and construction contingency plan</p> <p>Review post-construction survey results</p>	

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>historic structures located within 275 feet of pile driving activities prior to, during, and after vibration-generating construction activities. All plan tasks shall be undertaken under the direction of a licensed Professional Structural Engineer in the State of California and be in accordance with industry-accepted standard methods. Specifically:</p> <ul style="list-style-type: none"> • Vibration limits shall be applied to vibration-sensitive structures located within 90 feet of any high impact construction activities, such as pile driving, and 275 feet of historic buildings. • Performance of a photo survey, elevation survey, and crack monitoring survey for each structure of normal construction within 90 feet of any high impact construction activities and each historic structure within 275 feet of pile driving activities. Surveys shall be performed prior to any construction activity, in regular intervals during construction, and after project completion, and shall include internal and external crack monitoring in structures, settlement, and distress, and shall document the condition of foundations, walls and other structural elements in the interior and exterior of said structures. • Develop a vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted, set up a vibration monitoring schedule, define structure-specific vibration limits, and address the need to conduct photo, 					

Mitigation Measures	Implemented By	Implementation Timing	Monitored By	Monitoring Action	Monitoring Frequency
<p>elevation, and crack surveys to document before and after construction conditions. Construction contingencies shall be identified for when vibration levels approached the limits.</p> <ul style="list-style-type: none"> • At a minimum, vibration monitoring shall be conducted during all pile driving activities. • If vibration levels approach limits, suspend construction and implement contingency measures to either lower vibration levels or secure the affected structures. • Designate a person responsible for registering and investigating claims of excessive vibration. The contact information of such person shall be clearly posted on the construction site. <p>Conduct a post-construction survey on structures where either monitoring has indicated high vibration levels or complaints of damage has been made. Make appropriate repairs or compensation where damage has occurred as a result of construction activities.</p>					

Source: City of East Palo Alto. *Ravenswood/Four Corners Specific Plan Update SEIR*. November 2024.