

Mitigation Monitoring and Reporting Program

This Mitigation Monitoring and Reporting Program (MMRP) identifies the individual mitigation measures included in the Final EIR for the project that are applicable to Alternative 3 – Applicant’s Alternative, as that is the version of the “project” that is being considered for approval by the City Council.

Where a CEQA document has identified significant environmental effects, Public Resources Code Section 21081.6 requires public agencies to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of a project approval to mitigate or avoid significant effects on the environment.”

A public agency is required to ensure that the measures are fully enforceable, through permit conditions, agreements, or other means (Public Resources Code Section 21081.6(b)). A MMRP must be designed to ensure project compliance with mitigation measures during project implementation.

The City of Saratoga is the lead agency that must adopt an MMRP for development of the Saratoga Retirement Community Campus Master Plan project. This MMRP has been prepared to provide for the monitoring of mitigation measures required of the project (i.e., Alternative 3 – Applicant’s Alternative), as set forth in the Final EIR. This MMRP addresses those measures in terms of how and when they will be implemented.

Key features of the tables are briefly described below:

- Monitoring and Reporting Action identifies the outcome from implementation of mitigation measures.
- Implementation Timeframe provides the general schedule for conducting each mitigation task.
- Implementation Responsibility identifies the person/group responsible for implementation of the mitigation measure.
- Implementation Oversight assigns the responsibility for verifying compliance with each mitigation measure and reporting task.
- Verification of Compliance documents the person who verified implementation of the mitigation measure and the date on which this verification occurred.

Page left blank to facilitate double-sided printing.

Table 1: Mitigation Measures Applicable to Alternative 3 – Applicant’s Alternative

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance									
MM-AIR-2: Fugitive Dust Minimization Measures														
A. The construction contractor shall comply with the following BAAQMD BMPs for reducing construction emissions of uncontrolled fugitive dust (PM10 and PM2.5):	Include required measures in construction documents.	Prior to issuance of construction contract.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____									
<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 twice daily, or as often as needed, treated with non-toxic soil stabilizers, or covered to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. 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 (with reclaimed water, if possible) vacuum street sweepers at least once per day, or as often as needed. The use of dry power sweeping is prohibited. All vehicle speeds on unpaved roads shall be limited to 15 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. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13 CCR Section 2485). Clear signage shall be provided for construction workers at all access points. All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. A publicly visible sign shall be posted with the telephone number and person to contact regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD’s phone number shall also be visible to ensure compliance with applicable regulations. 	Maintain complaint records and corrective actions taken.	Throughout duration of construction.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____									
	Maintain site inspection records and	Throughout duration of construction.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____									
B. The Project Applicant’s project manager or his/her designee shall verify compliance that these measures are included in the Project’s grading plan and have been implemented during normal construction site inspections.														
MM-AIR-3: Require Clean Construction Equipment														
A. Construction contractors shall use equipment that meets the USEPA’s Tier 4 Final emissions standards for off-road diesel-powered construction equipment with engines rated 50 horsepower or greater for all construction activities, unless it can be demonstrated to the City of Saratoga Community Development Department on a case-by-case basis that such equipment is not available. Documentation shall consist of signed written statements from at least three construction equipment rental firms identifying that such equipment is not available. If the City of Saratoga Community Development Department grants the exception, the construction contractor must use the next-cleanest piece of available off-road equipment, according to the step-down alternative compliance table below. If seeking an exception, the construction contractor shall demonstrate to the City of Saratoga Community Development Department’s satisfaction that the resulting construction emissions would not exceed the health risk thresholds of significance for cancer risk and PM2.5 concentrations with respect to sensitive receptors, as identified within the EIR under Impact AIR-3.	Include required measures on construction documents.	Prior to issuance of construction contract.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____									
	Maintain records showing compliance with requirements.	Throughout duration of construction.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____									
<table border="1"> <thead> <tr> <th>Compliance Alternative</th> <th>Engine Emissions Standard</th> <th>Emissions Control</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Tier 4 Interim</td> <td></td> </tr> <tr> <td>2</td> <td>Tier 3</td> <td>CARB Level 3 VDECS</td> </tr> </tbody> </table> <p>Notes: How to use the table: If the City of Saratoga Community Development Department determines that the equipment requirements cannot be met, then the construction contractor must attempt to meet Compliance Alternative 1. If the City of Saratoga Community Development Department determines that the contractor cannot supply off-road equipment that meets Compliance Alternative 1, then the contractor must meet Compliance Alternative 2. VDECS = Verified Diesel Emissions Control Strategies</p>						Compliance Alternative	Engine Emissions Standard	Emissions Control	1	Tier 4 Interim		2	Tier 3	CARB Level 3 VDECS
Compliance Alternative	Engine Emissions Standard	Emissions Control												
1	Tier 4 Interim													
2	Tier 3	CARB Level 3 VDECS												
B. Prior to construction, the project engineer shall ensure that all construction (e.g., demolition and grading) plans clearly show the requirement for USEPA Tier 4 Final emissions standards for construction equipment over 50 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the City of Saratoga Community Development Department. The construction equipment list shall state the makes, models, and numbers of construction equipment on site in addition to the engine tier rating and CARB engine identification number for each piece of construction equipment.														
C. The construction equipment list shall state the makes, models, and numbers of construction equipment on site in addition to the engine tier rating and CARB engine identification number for each piece of construction equipment.														
MM-AIR-3-ALT3: Health Risk Assessment														
Prior to issuance of grading permits for Alternative 3, the Project Applicant shall conduct a health risk assessment for construction activities to calculate maximum PM2.5 annual concentrations, excess cancer risk, and chronic non-cancer risk, associated with Alternative 3 construction emissions, and identify additional measures to be implemented, as necessary, to ensure that sensitive receptors are not exposed to substantial pollutant concentrations. The analysis may include screening level analysis and/or a health risk assessment, consistent with applicable guidance from the BAAQMD. The City of Saratoga shall require the Project Applicant to implement feasible mitigation measures to reduce exposure of sensitive receptors to substantial pollutant concentrations to levels consistent with thresholds recommended by the BAAQMD (as shown in Table 3.3 7 of this EIR) or as applicable at the time the project is proposed. Agreed upon feasible mitigation actions shall be documented as a project condition of approval.	Submit health risk assessment to the City.	Prior to issuance of grading permits.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____									
	Maintain records demonstrating implementation of mitigation measures.	Throughout duration of construction (if needed)	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____									

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
MM-BIO-1: Nesting Bird Avoidance and Minimization Measures					
A. To the extent practicable, construction activities and any tree trimming/removal shall be performed from September 16 through February 15 to avoid the general nesting period for birds. If construction or tree trimming/removal cannot be performed during this period, nesting bird surveys and active nest buffers (as necessary) will be implemented as follows:	Retain qualified biologist.	Prior to initiation (or recommencement) of construction activities within nesting season (Jan 15-Sept 15 of each year).	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
i. Nesting Bird Surveys: If Project-related work is scheduled during the nesting season (typically February 15 to August 30 for small bird species such as passerines; January 15 to September 15 for owls; and February 15 to September 15 for other raptors), a qualified biologist will conduct two surveys for active nests of such birds within 14 days prior to the beginning of Project construction, with the final survey conducted within 48 hours prior to construction. Appropriate minimum survey radii surrounding the work area shall be determined by the qualified biologist but should be at least: i) 50 feet for passerines; ii) 300 feet for raptors. Surveys should be conducted at the appropriate times of day and during appropriate nesting times, as determined by the qualified biologist.	Submit survey results and active nest avoidance plan.		Project Applicant and qualified biologist	City of Saratoga Community Development Department	Name: _____ Date: _____
ii. Active Nest Buffers: If the qualified biologist documents active nests within the survey area, an appropriate buffer between the nest and active construction should be established. The buffer should be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist should conduct baseline monitoring of the nest to characterize "normal" bird behavior and establish a buffer distance which allows the birds to exhibit normal behavior. The qualified biologist should monitor the nesting birds daily during construction activities and increase the buffer if the birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, and/or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman should have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active. Construction will only be allowed to impact a migratory bird or its nest, including its young, if a permit from U.S. Fish and Wildlife Service is obtained in accordance with the MTBA.	Submit monitoring results (if required).	Throughout duration of construction within nesting season(s).	Project Applicant and qualified biologist	City of Saratoga Community Development Department	Name: _____ Date: _____
B. Notwithstanding the restrictions in measure A above, the removal of the cork oak tree (identified in the arborist's report as Tree #136) shall not be undertaken during the fall and winter months (September through February, inclusive). The applicant shall also consult with the City Arborist to determine if the tree could be retained on-site as a "snag", without creating a safety hazard.	Submit USFWS permit (if required)	Prior to construction within active nest buffer (if required)	Project Applicant and qualified biologist	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain records showing compliance with requirements.	Throughout duration of construction.	Project Applicant	City of Saratoga Community Development Department	Name: _____ Date: _____
MM-BIO-4: Roosting Bat Surveys and Avoidance					
A. The Project Applicant shall retain a qualified biologist to conduct a bat habitat assessment in all project areas that require tree removal. The qualified biologist will identify and document the location of potentially suitable bat roosting habitat prior to construction activities. If no suitable bat habitat is observed, the biologist shall inform the City Community Development Department, the Project Applicant and its Construction Contractor, and no further considerations are required. If bat roosting habitat is observed, the location of such habitat areas shall be provided to the City Community Development Department, the Project Applicant and its Construction Contractor, and the following requirements shall be implemented throughout the construction period:	Retain qualified biologist to conduct required habitat assessment and surveys.	Prior to tree removal activities.	Project Applicant and qualified biologist	City of Saratoga Community Development Department	Name: _____ Date: _____
i. Removal of trees that provide suitable bat roosting habitat shall be conducted outside of the bat maternity season (April 15 to August 31) and overwintering season (October 16 to January 15) to the extent feasible.	Submit bat habitat assessment results.	Prior to tree removal activities.	Project Applicant and qualified biologist	City of Saratoga Community Development Department	Name: _____ Date: _____
ii. Presence/absence surveys shall be conducted 2 to 3 days prior to removal of any trees in suitable bat habitat, at any time of year. If presence/absence surveys are negative, work may proceed with no restrictions. If presence/absence surveys detect bats within trees planned for removal, work should proceed in accordance with the following restrictions:	Submit presence/absence survey results.	Prior to removal of trees in suitable bat habitat.	Project Applicant and qualified biologist	City of Saratoga Community Development Department	Name: _____ Date: _____
• If a maternity colony of bats is observed during maternity season (April 15 to August 31), tree removal shall not occur until August 31 or when maternity season has ended based on surveys conducted by a qualified biologist.	Maintain records showing compliance with requirements.	Throughout duration of construction.	Project Applicant & construction contractors	City of Saratoga Community Development Department	Name: _____ Date: _____
• If bats are observed during overwintering season (October 16 to January 15), tree removal shall not occur until January 15 or until bats are no longer present based on surveys conducted by a qualified biologist.					
• If bats are present outside of maternity or overwintering seasons, construction shall follow a two-phase tree removal system conducted over 2 consecutive days. On the first day (in the afternoon), limbs and branches will be removed using chainsaws or other hand tools. Limbs with cavities, crevices, or deep bark fissures will be avoided, and only branches or limbs without those features will be removed. On the second day, the entire tree shall be removed.					
MM-CUL-1a: Historical Resource Protection Plan					
A. Prior to construction, the Project proponent shall prepare a Historical Resource Protection Plan, under the oversight of an architectural historian and/or historian meeting the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61). The Historical Resource Protection Plan shall be implemented throughout the duration of construction activities, and shall include, but not be limited to, the following measures:	Retain qualified architectural historian and qualified structural engineer.	Prior to construction.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
i. A pre-construction survey on the Manor Building shall be conducted by an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards. The Pre-construction survey shall establish a baseline of existing conditions of exterior of the Manor Building with written descriptions, photographs, and sketches of all cracks, spalling, or similar damage.	Submit Historic Resource Protection Plan.	Prior to construction.	Project Applicant and qualified architectural historian	City of Saratoga Community Development Department	Name: _____ Date: _____
ii. A vibration management and continuous monitoring plan shall be developed and adopted to protect the Manor Building against damage caused by vibration during project construction. The vibration management and monitoring plan related to the Manor Building shall be submitted to the Planning Division prior to issuance of any grading or building permits. The vibration management and monitoring plan shall be at the direction of the qualified structural engineer and shall constitute a blended approach, using both optical survey targets and crack monitors during construction shall measure whether construction vibration is approaching levels where damage to the historical resource may be possible. The vibration management and monitoring plan shall include site visits every six months by an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional	Submit pre-construction survey report.	Prior to construction.	Project Applicant and qualified architectural historian	City of Saratoga Community Development Department	Name: _____ Date: _____
	Submit vibration management and continuous monitoring plan.	Prior to construction.	Project Applicant and qualified structural engineer	City of Saratoga Community Development Department	Name: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
Qualification Standards, during the duration of construction to survey and record any changes to the exterior of the Manor Building. Construction methods shall be reevaluated if measurements and levels of vibration are found to exceed the levels established in the vibration management and monitoring plan and/or if damage to the historical resource may be possible.	Maintain monitoring records.	Throughout duration of construction.	Project Applicant and qualified architectural historian	City of Saratoga Community Development Department	Name: _____ Date: _____
iii. Pre-construction fencing shall be installed at construction zones around the perimeter of the Manor Building to prevent damage to the building from physical impact of construction equipment and/or vehicles. Such fencing shall be maintained throughout the duration of the construction periods for Building B and the Meeting Room, but shall allow for pedestrian access to and from the Manor Building by residents and others. If it is necessary to temporarily remove the fencing for logistical reasons, the physical and temporal extent of removal shall be minimized to the extent necessary for the task, and the unfenced area shall be monitored by a spotter until the fencing is replaced.	Maintain records showing compliance with fencing requirements.	Throughout duration of construction.	Project Applicant & construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
iv. A post-construction survey on the Manor Building shall be conducted by an architectural historian who meets the Secretary of the Interior's Historic Preservation Professional Qualification Standards. The post-construction survey shall report any changes that occurred to the exterior of the Manor Building during construction with written descriptions, photographs, and of all pre-construction survey areas that expanded during construction and/or any new cracks, spalling, or similar damage that occurred during construction. If the post-construction survey report documents any damage as a result of Project construction, the architectural historian shall make recommendations for the method of repair for such damage to pre-construction condition, in accordance with the Secretary of the Interior's Standards for Rehabilitation. The Project Applicant shall implement the recommended repairs under the oversight of the architectural historian at the Project Applicant's expense.	Submit post-construction survey report.	Following completion of construction.	Project Applicant and qualified architectural historian	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain records showing compliance with repair recommendations (if required)	Following completion of post-construction damage (if any).	Project Applicant & construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
MM-CUL-1b: Archival Documentation (HABS/HALS)	Retain SOI-qualified architectural historian or historian.	Prior to construction.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
A. The Manor Building and its associated character-defining features on the Project site shall be documented in accordance with the guidelines established for the Historic American Building Survey/Historic American Landscape Survey (HABS/HALS) program. At a minimum, archival documentation shall include:	Submit HABS Level III documentation and archival-quality prints.	Prior to construction.	Project Applicant and SOI-qualified architectural historian or historian.	City of Saratoga Community Development Department	Name: _____ Date: _____
i. Large-format photographs					
iii. Written narrative following HABS/HALS short format outline					
iv. Sketch plan of the Manor Building site, including spatial relationship to Odd Fellows Drive					
B. An architectural historian and/or historian meeting the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall oversee the preparation of the archival documentation. The Level III HABS-equivalent documentation shall cover the Manor Building, along with associated features, spaces, and landscaping.					
C. Archival-quality prints of the documentation shall be submitted to the City of Saratoga Community Development Department for archival and educational purposes. Additional print copies shall be made available to other local research institutions including the Saratoga Public Library.					
MM-CUL-1c: Interpretive Program	Implement/install interpretative program.	Prior to building occupancy.	Project Applicant and City of Saratoga	City of Saratoga Community Development Department	Name: _____ Date: _____
A. The Manor Building and its associated features on the Project site shall be commemorated in an interpretive program, the details of which shall be determined in consultation with the City of Saratoga Community Development Department. The interpretive program may include, but shall not be limited to:					
i. Exhibit, website, pamphlet or similar					
ii. Historical displays					
MM-CUL-1d-ALT3: Design Review for Parking Lot	Submit detailed design plans for parking lot.	Prior to issuance of grading permits.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
Prior to issuance of a grading permit for Alternative 3, the Project Applicant shall submit detailed designs for the proposed parking lot to the City for design review by an architectural historian who meets the Secretary of the Interior's Professional Qualification Standards. The Project Applicant shall revise the design, as needed, based on the recommendations of the architectural historian, to avoid substantial adverse changes to the setting of the Manor Building.	Review detailed design plans for compliance with SOI standards.	Prior to issuance of grading permits.	City of Saratoga Community Development Department and qualified architectural historian.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Revise design, if needed, to address recommendations.	Prior to issuance of grading permits.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
MM-CUL-2: Inadvertent Discovery Plan	Retain qualified archaeologist and tribal representative.	Prior to construction.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
A. Prior to the start of earthmoving activities, the Project Applicant shall retain a qualified archaeologist and a representative from Tamien Nation to develop and implement Archaeological Awareness and Tribal Cultural Resources Sensitivity Training and to develop a Monitoring and Treatment Plan in coordination with the City Community Development Department.	Maintain training records.	Prior to the start of ground-disturbing activities or new workers starting.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
i. The training shall include information regarding the possibility of encountering buried cultural resources (including tribal cultural resources), the appearance and types of resources likely to be seen during construction, notification procedures, and proper protocols to be followed should suspected or confirmed resources be					

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
encountered. This training shall be provided to all workers prior to their involvement in ground-disturbing activities throughout the duration of construction and shall be documented in training records.	Submit Monitoring and Treatment Plan.	Prior to the start of ground-disturbing activities.	Project Applicant, qualified archaeologist and tribal representative.	City of Saratoga Community Development Department	Name: _____ Date: _____
ii. The Monitoring and Treatment Plan shall include a project description, background information and context, definitions of monitoring roles and requirements for the project, protocols for discoveries during project work, a list of research questions, and specifications for treatment of finds, including scope of analysis, appropriate analytical techniques, and directions for curation and/or repatriation. This document also describes necessary documentation during project work (e.g., monitoring logs), and defines reporting requirements for results.	Maintain monitoring records.	Throughout construction.	Project Applicant, qualified archaeologist and tribal representative.	City of Saratoga Community Development Department	Name: _____ Date: _____
B. The Project Applicant shall retain a Tamien Nation tribal cultural resources monitor to undertake construction monitoring during initial ground disturbing activities within native soils. Monitoring is not required for redisturbance of soils that have already been monitored. The Project Applicant shall also retain a qualified archaeologist to be on-call during construction and/or to be present for monitoring of initial ground disturbing activities.	Provide notification regarding suspected resource(s), if encountered.	Immediately following discovery of suspected resource.	Project Applicant, qualified archaeologist and tribal representative.	City of Saratoga Community Development Department	Name: _____ Date: _____
C. In the event that prehistoric or historic resources (or suspected resources) are encountered during project construction, all activity within a 50-foot radius of the find shall be stopped, the Project Applicant's Project Manager or designee and the City Community Development Department shall be notified, and the Tamien Nation tribal monitor and the on-call archaeologist shall examine the find. Project personnel shall not collect or move any cultural material. The archaeologist, in collaboration with the Tamien Nation tribal representative, shall evaluate the find(s) to determine if it meets the definition of a historical, unique archaeological, and/or tribal cultural resource, and follow the further procedures outlined below:	Maintain consultation records (if required).	Throughout consultation process (if applicable).	Project Applicant	City of Saratoga Community Development Department	Name: _____ Date: _____
i. If the find(s) does not meet the definition of a historical resource or unique archaeological resource, no further study or protection is necessary prior to resuming Project implementation.	Submit report of findings (if required).	Following data recovery (if applicable)	Project Applicant, qualified archaeologist and tribal representative.	City of Saratoga Community Development Department	Name: _____ Date: _____
ii. If the find(s) does meet the definition of a historical resource or unique archaeological resource, then it shall be avoided by Project activities. If avoidance is not feasible, as determined by the City Community Development Department, the qualified archaeologist, in collaboration with the Tamien Nation tribal representative, shall make appropriate recommendations regarding the treatment and disposition of such finds, and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, in collaboration with the Tamien Nation tribal representative, prior to resuming construction activities within the 50-foot radius.	Maintain records showing fill sources.	Throughout construction	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
iii. If the find(s) is potentially a tribal cultural resource, then the Tamien Nation tribal representative shall be consulted. If, after consultation with the Tamien Nation, it is determined that the find(s) is a tribal cultural resource, then the find(s) shall be avoided by Project activities. If avoidance is not feasible, as determined by the City Community Development Department, the qualified archaeologist, in consultation with tribal representatives and the City Community Development Department, shall make appropriate recommendations regarding the treatment and disposition of such finds and significant impacts to such resources shall be mitigated in accordance with the recommendations of the archaeologist, and reasonably agreed upon by the Tamien Nation, prior to resuming construction activities within the 50-foot radius.	Implement/install interpretative panel/plaque.	Prior to building occupancy.	Project Applicant	City of Saratoga Community Development Department Tamien Nation Tribe	Name: _____ Date: _____
iv. If the find(s) are human remains or grave goods, the requirements of PRC Section 5097.98, California Health and Safety Code Sections 7050.5, 7051, and 7054, and CEQA Guidelines Section 15064.5(e), shall be followed.					
v. Recommendations for treatment and disposition of finds could include, but are not limited to, the collection, recordation, and analysis of any significant cultural materials, or the turning over of tribal cultural resources to tribal representatives for appropriate treatment. A report of findings documenting any data recovery shall be submitted to the Northwest Information Center (NWIC). A redacted report of findings shall be submitted to the City Community Development Department.					
D. Reasonable efforts should be made to ensure that fill soils used for this Project do not contain archaeological materials. If it is found that fill soils used for construction purposes do contain archaeological materials, a different source of fill materials must be retained immediately.					
E. The Project Applicant shall fabricate and install an interpretive panel or plaque as part of the public trail connection along Odd Fellows Drive, acknowledging the tribal history and indigenous peoples of the area. The content of the panel shall be developed in consultation with the City Community Development Department and Tamien Nation tribal representatives.					
MM-GEO-6: Paleontological Resource Avoidance Measures	Maintain training records.	Prior to the start of ground-disturbing activities or new workers starting.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
A. Before the start of earthmoving activities associated with Project construction, the Project Applicant shall require that all construction personnel involved with earthmoving activities be informed regarding the possibility of encountering fossils, the appearance and types of fossils likely to be seen during construction, and proper notification procedures if such fossils are encountered. This worker training may be prepared and presented by an experienced field archaeologist at the same time as construction worker education on cultural resources, or prepared and presented separately by a qualified paleontologist.	Provide notification of suspected resource(s), if encountered.	Immediately following discovery of suspected resource.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
B. If paleontological resources are discovered during earthmoving activities, all work within 50 feet of the find shall cease immediately, and the construction contractor shall notify the City of Saratoga Community Development Department. The Project Applicant shall retain a qualified paleontologist to evaluate the resource and prepare a recovery plan, based on SVP guidelines (SVP 2010). The recovery plan may include a field survey, construction monitoring, sampling and data recovery procedures, museum curation for any specimen recovered, and a report of findings. Recommendations in the recovery plan that are determined by the City Community Development Department to be necessary and feasible shall be implemented before construction activities resume at the site where the paleontological resources were discovered.	Retain qualified paleontologist (if required).	Immediately following discovery of suspected resource.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Submit recovery plan (if required).	Prior to construction resuming in area where resource found.	Project Applicant and qualified paleontologist.	City of Saratoga Community Development Department	Name: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
MM-GHG-1a: Require Compliance with Electric Vehicle Requirements in CALGreen Tier 2 Prior to issuance of building permits, Project Building Plans shall demonstrate compliance with the following applicable measure included in the BAAQMD Thresholds for Climate Impacts, to the satisfaction of the City of Saratoga Community Development Department, that the Project achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.	Submit project plans showing compliance with EV requirements.	Prior to issuance of building permits.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
MM-GHG-1b: Participation in Silicon Valley Clean Energy Program or On-Site Renewable Energy The Project shall enroll in the Silicon Valley Clean Energy "GreenStart" or "GreenPrime" program, which provide 100 percent GHG emissions free electricity to participating customers or meet 100 percent of their electricity demand through on-site renewable energy, such as solar panels.	Submit evidence of initial enrolment in program OR that on-site renewable provision meets 100% of demand.	Prior to issuance of building permits.	Project Applicant or SRC Facility Management.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain evidence OR ongoing enrolment or continued on-site renewable provision.	Throughout project operation.	SRC Facility Management	City of Saratoga Community Development Department	Name: _____ Date: _____
MM-NOI-1a: Update and Implement Construction Noise Mitigation Plan The Project Applicant and its construction contractor(s) shall retain a qualified acoustic consultant to update the preliminary Construction Noise Management Plan to include the following actions, and shall implement the updated plan throughout the duration of construction activities at the project site. The updated Construction Noise Management Plan shall be submitted to the City of Saratoga Community Development Department for review and approval prior to issuance of a grading or building permit for the project. <ul style="list-style-type: none"> A. Provide ongoing coordination and training to all subcontractors on "Noise Awareness Training". Training will help ensure the Construction Noise Mitigation Plan is implemented effectively. B. Engage the public and residents for active feedback: <ul style="list-style-type: none"> i. Provide sufficient notice (no fewer than 14 days prior to onset of any noise-intensive construction activity) to the facility, its residents, and neighboring properties within 200 feet of any construction area, including the anticipated schedule of planned work (if needed) on future construction activities. ii. Such notices shall include contact information for a point of contact to address questions or noise concerns. iii. Conduct weekly status meeting with the Facilities team outlining upcoming activities, which shall be verifiably relayed to the residents. C. Identify noise abatement opportunities below, wherever practicable: <ul style="list-style-type: none"> i. Locate haul routes away from active noise-sensitive buildings ii. Locate storage and construction staff parking areas off site. iii. Design foundation systems that eliminate noise-intensive creating work, (e.g., pile driving). iv. Design shoring systems that prevent unnecessary noise or vibration. D. Mitigation at noise source: <ul style="list-style-type: none"> i. Specify the use of quieter equipment/procedure alternatives, where practicable, in the contract documents. ii. Require equipment used onsite to produce sound levels below the City of Saratoga 100 dBA limit at 25 feet. iii. Schedule construction activities that generate higher noise levels at optimal times of the day. iv. Ensure all construction activities occur within the working hours prescribed by the City of Saratoga. v. Install temporary signage on approaches to speed bumps along on-site haul routes to remind drivers to slow down before crossing. E. Path mitigation by providing sound barriers. <ul style="list-style-type: none"> i. Provide temporary sound barriers along heavy traffic paths and portions of the site haul route as needed. ii. Provide temporary sound barriers that would obstruct the line-of-sight from receptors to key construction zone areas for all receptors predicted to experience construction noise levels greater than the FTA criterion of 80 dBA (Leq(8-hour)). Such barriers shall be designed by a qualified acoustic consultant and shall be of sufficient mass and dimension to reduce predicted construction noise levels to the FTA criterion or lower wherever practicable. Should barrier implementation be infeasible, or if monitoring shows that noise levels at receptors still exceed the FTA criterion, residence windows shall be acoustically upgraded with sufficient window inserts (as recommended by the qualified acoustic consultant) or affected residents shall be temporarily relocated. F. Construction Noise Monitoring <ul style="list-style-type: none"> i. Noise measurements shall be conducted on a weekly basis, or more frequently if complaints are received, to verify that noise barriers are performing as intended and construction noise levels remain at or below the FTA criterion at receptors. Measurements shall be conducted for a period considered representative of noise levels for the given day/week. Noise measurements shall also be conducted at the onset of new construction phases (considering phase changes in nearby work areas as well) and if ongoing construction activities shift drastically toward a receptor. ii. Measurements shall be conducted by or under the direction of a qualified acoustic consultant using a sound level meter rated by the American National Standards Institute as Class 1 or Class 2 per American National Standards Institute S1.4-2014. iii. Should monitored noise levels exceed the FTA criterion, construction activities generating the exceedance shall be stopped until either construction noise levels can be reduced to within limits or residents are relocated. G. Noise Receptor Mitigation 	Retain qualified acoustic consultant	Prior to construction.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Submit updated Construction Noise Management Plan	Prior to issuance of grading or building permits.	Project Applicant and construction contractors and qualified acoustic consultant.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain evidence of Construction Noise Management Plan implementation.	Throughout construction duration.	Project Applicant	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain training and coordination records.	Throughout construction duration.	Project Applicant and construction contractors.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain records of public/resident engagement and notifications.	Throughout construction duration.	Project Applicant, construction contractors, and SRC Management.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain record of complaints and actions taken to address.	Throughout construction duration.	Project Applicant, construction contractors, and SRC Management.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Specify use of quieter equipment and procedures in contract documents.	Prior to issuance of construction contract.	Project Applicant.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain noise measurement records and actions taken to address exceedances (if required).	Throughout construction duration.	Project Applicant and construction contractors and qualified acoustic consultant.	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain function of HVAC systems in existing buildings.	Throughout construction duration.	Project Applicant and SRC Facility Management.	City of Saratoga Community Development Department	Name: _____ Date: _____

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
<ul style="list-style-type: none"> i. The contractor shall coordinate with the facility to move residents temporarily if needed during construction activities that are disruptive. ii. Facility management shall ensure that building heating, ventilation, and air conditioning systems are operating at full capacity/function throughout the construction period, to allow residents to maintain closed windows throughout the construction period. 					
<p>Mitigation MM-NOI-1b: Limit Sound Power Level of Mechanical Equipment or Implement Additional Noise-Reduction Measures</p> <p>Where possible, the Project Applicant shall install rooftop mechanical (HVAC) equipment with a sound power rating of 91 dBA or less on all proposed buildings. If mechanical equipment with a Sound Power Level rating of more than 91 dBA is to be installed, then prior to building permit issuance, the Project Applicant shall retain a qualified acoustic consultant to model the predicted noise levels on adjacent properties, based on the actual Sound Power Level rating of the units proposed for installation. The qualified acoustic consultant shall submit a report to the City Community Development Department showing the predicted noise levels, and recommending additional measures (e.g., additional acoustic screening) to reduce the predicted noise levels at all adjacent properties to below the 40 dBA Leq threshold. The report shall also demonstrate that the recommended additional measures adequately reduce the predicted noise levels to below the 40 dBA Leq threshold.</p>	<p>Submit evidence that HVAC unit sound power ratings do not exceed 91 dBA.</p> <p>OR</p> <p>Submit additional modeling to demonstrate compliance with 40 dBA Leq threshold at property boundary.</p>	Prior to building permit issuance.	Project Applicant and SRC Facility Management.	City of Saratoga Community Development Department	Name: _____ Date: _____
<p>MM-NOI-2: Construction Vibration Minimization Measures</p> <p>The Project Applicant shall include the following measures in its contractor specifications, and such measures shall be implemented by the Contractor(s) during construction:</p> <ul style="list-style-type: none"> A. The use of vibratory rollers within a 25-foot buffer zone around the Manor Building and other occupied structures, and the use of drill rigs, large bulldozers, or dump trucks within a 15-foot buffer of the Manor Building and other occupied structures shall be avoided to the maximum extent practicable. B. Where practicable, smaller equipment which generates lower levels of vibration shall be used within the specified buffer zones. C. Advance notice (at least 14 days) shall be provided to SRC residents, neighboring property owners and the City Community Development Department for construction activities requiring use of vibratory rollers within 75 feet of residential units, or the use of drill rigs, large bulldozers, or dump trucks within 45 feet of residential units. 	<p>Include required measures in construction documents.</p> <p>Maintain notification records.</p>	<p>Prior to issuance of construction contract.</p> <p>Throughout construction.</p>	<p>Project Applicant.</p> <p>Project Applicant and construction contractors.</p>	<p>City of Saratoga Community Development Department</p> <p>City of Saratoga Community Development Department</p>	<p>Name: _____ Date: _____</p> <p>Name: _____ Date: _____</p>
<p>MM-TRA-3a: Construction Traffic Control Plan.</p> <ul style="list-style-type: none"> D. Prior to issuance of demolition or grading permits, the Project Applicant and/or its construction contractor shall develop a traffic control plan in accordance with the City's Standard Details and Specifications for Construction and Temporary Traffic Control Plan Requirements and shall submit the plan to the City Community Development Department for review and approval. The Traffic Control Plan shall be implemented throughout the duration of construction and shall include, but not be limited to, the following: <ul style="list-style-type: none"> i. Schedule of construction showing each phase of the project, construction hours, and anticipated method of handling traffic for each phase, including drawings identifying lane configurations, haul routes, road and lane closures, detour routes for vehicular and pedestrian traffic, work areas, staging areas, and worker parking areas. The location of signs, barricades, codes, etc., to warn, direct, and guide traffic shall be shown on the plan, as well as any supplementary traffic control devices that might be required. The plan shall address both vehicular traffic as well as pedestrians, and shall specifically address pedestrians utilizing mobility devices such as wheelchairs, motorized scooters, and walking frames, for example, as well as pedestrians with visual and/or hearing impairments. ii. Development and implementation of a process for communicating with owners/occupants of properties accessed via Odd Fellows Drive and/or San Marcos Road about Project construction, with at least 72 hours advance notice prior to commencing work on the Project and of any temporary lane or road closures (including private roadways within the SRC campus). Notification shall include the construction schedule, the exact location and duration of activities on each roadway, detours and alternative routes that may be available to avoid delays, and contact information for questions and complaints. The City Community Development Department shall be included in any notifications. iii. Notification of administrators of any affected police and fire stations, and ambulance service providers regarding the timing, location, and duration of construction activities and the locations of detours and road or lane closures. Access for emergency vehicles on and/or adjacent to roadways affected by construction activities shall be maintained at all times. iv. Scheduling equipment/deliveries during off-peak vehicular commuter hours and use of flaggers if oversized loads are required. 	<p>Submit Construction Traffic Control Plan.</p> <p>Maintain records demonstrating compliance with Construction Traffic Control Plan.</p> <p>Maintain notification records for affected property owner/occupants and public service administrators.</p>	<p>Prior to issuance of demolition or building permits.</p> <p>Throughout construction duration.</p> <p>Throughout construction duration.</p>	<p>Project Applicant and construction contractors.</p> <p>Project Applicant and construction contractors.</p> <p>Project Applicant and construction contractors.</p>	<p>City of Saratoga Community Development Department</p> <p>City of Saratoga Community Development Department</p> <p>City of Saratoga Community Development Department</p>	<p>Name: _____ Date: _____</p> <p>Name: _____ Date: _____</p> <p>Name: _____ Date: _____</p>
<p>MM-TRA-3b-ALT3: Implement Recommendations of Original and Supplemental Traffic Studies</p> <ul style="list-style-type: none"> A. The Project Applicant shall implement all recommendations of the Traffic Study prepared for the Project by Hexagon Transportation Consultants Inc., dated January 22, 2021, which are: <ul style="list-style-type: none"> i. that the Project Applicant ensure that there is no tall vegetation near the driveways that would block a driver's sight distance in accordance with Caltrans' stopping sight distance based on roadway speed; ii. that stop signs should be installed for exiting vehicles at all new intersections, and a drop-off area be maintained in front of the Manor Building; iii. that a sign indicating one-way travel be installed at the exit from Pavilion Circle onto West Cottages Lane; and iv. that the Project Applicant clearly communicate with the delivery vehicles that they need to park in designated areas on site. B. In addition, the Project Applicant shall implement the following additional measures pertaining to traffic safety: <ul style="list-style-type: none"> i. develop and implement a delivery schedule for vendors so that the number of simultaneous deliveries to campus does not exceed the available designated loading space. ii. ensure that no signage is installed that would block a driver's sight distance (per item A.i above). C. The Project Applicant shall implement all recommendations of the supplemental traffic memorandum prepared for the Project Applicant's alternative site plan by Hexagon Transportation Consultants, Inc., dated April 21, 2023, which are: 	<p>Maintain vegetation and prohibit signs/ancillary structures within sight distance triangles.</p> <p>Install necessary signage and painted nose.</p> <p>Maintain drop-off area in front of Manor Building.</p> <p>Maintain records of vendor delivery schedule implementation</p>	<p>Throughout project operation.</p> <p>Prior to new roads and driveways being used</p> <p>Throughout project operation.</p> <p>Throughout project operation.</p>	<p>SRC Facility Management</p> <p>Project Applicant</p> <p>SRC Facility Management</p> <p>SRC Facility Management</p>	<p>City of Saratoga Community Development Department</p> <p>City of Saratoga Community Development Department</p> <p>City of Saratoga Community Development Department</p> <p>City of Saratoga Community Development Department</p>	<p>Name: _____ Date: _____</p> <p>Name: _____ Date: _____</p> <p>Name: _____ Date: _____</p> <p>Name: _____ Date: _____</p>

Mitigation Measure	Mitigation and Reporting Action	Implementation Timeframe	Implementation Responsibility	Implementation Oversight	Verification of Compliance
<ul style="list-style-type: none"> i. Install a painted nose where Manor Circle and the new parking lane meet, to ensure vehicles on both roadways stay within their own lanes before they turn onto Colfax Avenue (refer Figure 1 of Hexagon 2023 memorandum). ii. Install stop signs at the end of Manor Circle and the new parking lane to establish intersection operation orders at the Colfax Lane intersection. iii. Ensure there are no tall vegetations or objects that would prevent a driver's ability to see vehicles turning onto Colfax Lane from Odd Fellows Drive (recommended stopping sight distance of 50 feet). i. Ensure there are no tall vegetations or objects that would prevent a driver's ability to see at least 150 feet south on Colfax Lane (recommended stopping sight distance of 150 feet). 					
<p>C-MM-NOI-1: Cumulative Construction Traffic Noise Reduction Plan</p> <p>In the unlikely event that the construction period for the Project overlaps with the construction period for future development on the adjacent Fellowship Plaza property, the Project Applicant and its construction contractor, in conjunction with the developer and contractor for the Fellowship Plaza project, shall develop a combined construction traffic noise reduction plan. The plan shall be submitted to the City Community Development Department for review and approval and shall be implemented by the Project Applicant and its contractors throughout the duration of overlapping construction. The combined plan shall contain, but not be limited to, the following:</p> <ul style="list-style-type: none"> A. Identification of anticipated periods when construction of the two projects would overlap, and the estimated level of construction traffic that would utilize Odd Fellows Drive and San Marcos Road from each project during those periods. B. Analysis from a qualified acoustic consultant determining the estimated cumulative increase in traffic noise along Odd Fellows Drive and San Marcos Road during those periods when the two projects would overlap. If the combined increase in traffic noise would exceed 5 dBA above existing levels at any time during the overlapping construction periods, the acoustic consultant shall provide details of the location and design of temporary noise barriers and/or other measures that would be required in order to shield adjacent sensitive receptors such that the combined increase in traffic noise at any receptor would not exceed 5 dBA above existing levels. C. A cost-sharing agreement between the two project proponents for implementation of required shielding measures. 	Require similar mitigation or condition of approval.	Prior to City approval of future development plan at Fellowship Plaza property.	City of Saratoga Community Development Department	City of Saratoga Community Development Department	Name: _____ Date: _____
	Submit combined Construction Traffic Noise Reduction Plan.	Prior to commencement of any overlapping construction activities.	Project Applicant and construction contractor Fellowship Plaza Developer and construction contractor	City of Saratoga Community Development Department	Name: _____ Date: _____
	Develop cost-sharing agreement.	Prior to commencement of any overlapping construction activities.	Project Applicant and construction contractor Fellowship Plaza Developer and construction contractor	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain records demonstrating compliance with combined Construction Traffic Noise Reduction Plan.	Throughout construction duration.	Project Applicant and construction contractor Fellowship Plaza Developer and construction contractor	City of Saratoga Community Development Department	Name: _____ Date: _____
<p>C-MM-TRA-4: Coordination of Traffic Control Plans</p> <p>In the event that the construction period for the Project overlaps with the construction period for future development on the adjacent Fellowship Plaza property, the Project Applicant and its construction contractor shall coordinate closely with the developer and contractor for that project to develop a combined construction traffic control plan addressing the combined impacts of temporary disruptions to Odd Fellows Drive and San Marcos Road and the secondary emergency access points between Odd Fellows Drive and Chester Avenue. The combined plan shall be submitted to the City Community Development Department for review and approval, and shall be implemented by the Project Applicant and its contractors throughout the duration of overlapping construction. The combined plan shall contain, but not be limited to, the same contents described in MM-TRA-3a, but pertaining to construction of both projects.</p>	Submit combined Construction Traffic Control Plan.	Prior to commencement of any overlapping construction activities.	Project Applicant and construction contractor Fellowship Plaza Developer and construction contractor	City of Saratoga Community Development Department	Name: _____ Date: _____
	Maintain records demonstrating compliance with combined Construction Traffic Control Plan.	Throughout construction duration.	Project Applicant and construction contractor Fellowship Plaza Developer and construction contractor	City of Saratoga Community Development Department	Name: _____ Date: _____

Page left blank to facilitate double-sided printing.