



MITIGATION MONITORING + REPORTING PROGRAM

PROJECT NAME	660 University Avenue Mixed-Use Project	APPLICATION NUMBER	21PLN-00341
APPLICANT AGREEMENT		DATE	10/1/2025
APPROVED BY	DocuSigned by: <i>Emily Kallas</i> EFA3557B6E9A43B...		
APPLICANT/OWNER	Smith Development 682 Villa Street, Suite G Mountain View, California 94041		

The Final Revised Environmental Impact Report (EIR) for the 660 University Avenue Mixed-Use Project identifies the mitigation measures that must be implemented to reduce the environmental impacts associated with the project. California Environmental Quality Act (CEQA) Section 21081.6 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to proposed development. As stated in section 21081.6(a)(1) of the Public Resources Code:

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

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

The mitigation monitoring table lists those mitigation measures that would be included as conditions of approval for the project. To ensure that the mitigation measures are properly implemented, a monitoring program has been devised which identifies the timing and responsibility for monitoring each measure.



MITIGATION MONITORING + REPORTING PROGRAM

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
AIR QUALITY			
AQ-1. Construction Emissions Reduction. Prior to construction activity and issuance of grading and building permits, the property owner or their designee shall ensure that the following specifications are detailed in the grading plan, building plan, and any contractor agreements and ensure that they be implemented during construction: - All mobile off-road equipment (wheeled or tracked) used during construction activities over 25 horsepower shall meet the USEPA Tier 4 final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards. - All mobile off-road equipment (wheeled or tracked) used during construction activities under 25 horsepower, such as generators, pumps, forklifts, cement and mortar mixes, and plate compactors shall be equipped with Level 3 diesel particulate filters.	Project Applicant/verified by the Planning & Development Services Department	Prior to the initiation of construction activities During grading and construction	City of Palo Alto Planning & Development Services Department
Biological Resources			
BIO-1. Nesting Bird Surveys and Avoidance. Construction of the project and other site disturbing activities that would involve vegetation or tree removal shall be prohibited during the general avian nesting season (February 1 – August 31), if feasible. If nesting season avoidance is not feasible, the applicant shall retain a qualified biologist, as approved by the City of Palo Alto, to conduct a preconstruction nesting bird survey to determine the presence/absence, location, and activity status of any active nests on or adjacent to the project site. The extent of the survey buffer area surrounding the site shall be established by the qualified biologist to ensure that direct and indirect effects to nesting birds are avoided. To avoid the destruction of active nests and to protect the reproductive success of birds protected by the MBTA and CFGC, nesting bird surveys shall be performed not more than 14 days prior to scheduled vegetation clearance and structure demolition. In the event that active nests are discovered, a suitable buffer (typically a minimum buffer of 50 feet for	Project Applicant/verified by the Planning & Development Services Department	Not more than 14 days prior to scheduled vegetation clearance and structure demolition, if construction proposed during the general avian nesting season	City of Palo Alto Planning & Development Services Department

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
passerines and a minimum buffer of 250 feet for raptors) shall be established around such active nests and no construction shall be allowed within the buffer areas until a qualified biologist has determined that the nest is no longer active (i.e., the nestlings have fledged and are no longer reliant on the nest). Nesting bird surveys are not required for construction activities occurring between August 31 and February 1.		During project construction	
BIO-2. Tree Protection Plan. During the project design phase, the project applicant shall comply with and implement design guidelines listed in Section 6.1 of the February 7, 2024 Arborist Report prepared by David L. Babby. Guidelines include delineation of tree protection zones, specific actions related to grading and excavation, specifications for new paving and hardscape, and erosion control and landscaping requirements, among others., the project applicant shall comply with tree protection measures listed in Section 6.2 of the Arborist Report. Guidelines include a review of tree protection and construction processes, inspections and supervisions under direction of the project arborist, and installation of TPZs, among others. During demolition, grading, and construction, the project applicant shall comply with tree protection measures listed in Section 6.3 of the Arborist Report. Guidelines include specific actions related to demolition, excavation, and trenching, supervisions under direction of the project arborist, and disposal requirements, among others. A qualified arborist shall be retained and present for any activity that could impact trees on- and off-site.	Project Applicant/ verified by the Planning & Development Services Department	During project design Prior to demolition, grading, and construction During demolition, grading, and construction	City of Palo Alto Planning & Development Services Department
BIO-3. Oak Tree Pruning and Protection. Larger roots shall be pruned using a fine-tooth saw, and smaller roots shall be pruned using a hand loop. If roots are to be left exposed for long periods of time, especially in warm weather, they must be covered in burlap cloth and kept wet. Branch pruning shall be highly selective and limited to avoid significant cuts. A qualified arborist shall be present on site to oversee any root pruning activities, as well as any branch pruning activities and shall provide guidance regarding which branches to cut. The qualified arborist shall also perform annual inspections for five to 10 years following building occupancy. Branch pruning work shall be performed by a tree service with an ISA Certified Arborist in a supervisory role on-site.	Project Applicant/ verified by the Planning & Development Services Department	During pruning activities	City of Palo Alto Planning & Development Services Department
Cultural Resources and Tribal Cultural Resources			
CUL-1. Worker's Environmental Awareness Program. The property owner or their designee shall retain a qualified archaeologist to conduct a Worker's Environmental Awareness Program (WEAP) training for archaeological sensitivity for all construction personnel prior to the commencement of any ground disturbing activities. Archaeological sensitivity training shall include a description of the types of cultural	Project Applicant/ verified by the Planning & Development Services	Prior to the commencement of any ground disturbing activities	City of Palo Alto Planning & Development Services Department

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
material that may be encountered, cultural sensitivity issues, regulatory issues, the proper protocol for treatment of the materials in the event of a find, and an outline of the penalties for the willful and intention damage of cultural resources.	Department		
CUL-2. Unanticipated Discovery of Archaeological Resources. In the event that archaeological resources are unearthed during project construction, all earth-disturbing work near the find must be temporarily suspended or redirected until an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (NPS 1983) has evaluated the nature and significance of the find. If the discovery proves to be significant under CEQA (Section 15064.5f; PRC 21082), additional work, such as preservation in place or archaeological data recovery, shall occur as recommended by the archeologist in coordination with City staff and if applicable, the most likely descendants. Once the resource has been properly treated or protected, work in the area may resume. A Native American representative shall be retained to monitor mitigation work associated with Native American cultural material.	Project Applicant/ verified by the Planning & Development Services Department	During ground disturbing activities	City of Palo Alto Planning & Development Services Department
GEOLOGY AND SOILS			
GEO-1. Paleontological Resources Monitoring and Mitigation. Qualified Professional Paleontologist. Prior to excavation, the project applicant shall retain a Qualified Professional Paleontologist (defined by the SVP (2010) as an individual, preferably with an M.S. or Ph.D. in paleontology or geology, who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for at least two years). The Qualified Professional Paleontologist shall direct all mitigation measures related to paleontological resources.	Project Applicant/ verified by the Planning & Development Services Department	Prior to the start of grading or construction activities and during construction activities	City of Palo Alto Planning & Development Services Department
Paleontological Worker Environmental Awareness Program. Prior to the start of construction, the Qualified Professional Paleontologist or their designee shall conduct a paleontological Worker Environmental Awareness Program (WEAP) training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. Paleontological Monitoring. Full-time paleontological monitoring shall be conducted during ground disturbing construction activities reaching more than 5 feet below the ground surface in areas mapped as Quaternary coarse-grained alluvium and ground. Paleontological monitoring shall be conducted by a paleontological monitor with experience with collection and salvage of paleontological resources and who meets the minimum standards of the SVP (2010) for a Paleontological Resources Monitor. The duration and timing of the monitoring will be determined by the Qualified			

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
Professional Paleontologist based on the observation of the geologic setting from initial ground disturbance, and subject to the review and approval by the City of Palo Alto. If the Qualified Professional Paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions once the full depth of excavations has been reached, they may recommend that monitoring be reduced to periodic spot-checking or ceased entirely. Monitoring shall be reinstated if any new ground disturbances are required, and reduction or suspension shall be reconsidered by the Qualified Professional Paleontologist at that time. In the event of a fossil discovery by the paleontological monitor or construction personnel, the following measures shall apply: ▪ Fossil Salvage. If fossils are discovered, the paleontological monitor shall have the authority to halt or temporarily divert construction equipment within 50 feet of the find until the paleontological monitor and/or Qualified Professional Paleontologist evaluate the discovery and determine if the fossil may be considered significant. Typically, fossils can be safely salvaged quickly by a single paleontological monitor and not disrupt construction activity. In some cases, larger fossils (such as complete skeletons or large mammal fossils) require more extensive excavation and longer salvage periods. Bulk matrix sampling may be necessary to recover small invertebrates or microvertebrates from within paleontologically sensitive deposits ▪ Fossil Preparation and Curation. Once salvaged, significant fossils shall be identified to the lowest possible taxonomic level, prepared to a curation-ready condition, and curated in a museum repository with a permanent paleontological collection along with all pertinent field notes, photos, data, and maps. Fossils of undetermined significance at the time of collection may also warrant curation at the discretion of the Qualified Professional Paleontologist. ▪ Final Paleontological Mitigation Report. Upon completion of ground disturbing activity (and curation of fossils if necessary) the Qualified Professional Paleontologist shall prepare a final report describing the results of the paleontological monitoring efforts associated with the project. The report shall include a summary of the field and laboratory methods, an overview of the project geology and paleontology, a list of taxa recovered (if any), an analysis of fossils recovered (if any) and their scientific significance, and recommendations. The report shall be submitted to the City of Palo Alto Director of Planning and Development Services. If the monitoring efforts produced fossils, then a copy of the report shall also be submitted to the designated museum repository.			

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
Noise			
Recommended Measure N-1. Construction Noise Reduction Measures. The construction contractor shall prepare a Construction Noise Control Plan prior to issuance of a grading permit. The Construction Noise Control Plan shall specify the noise reduction measures to be implemented during project construction to ensure noise levels are reduced at nearby residences. The measures specified in the Construction Noise Control Plan shall be included on the building and grading plans and shall be implemented by the construction contractor during construction. At a minimum, the Construction Noise Control Plan shall include the following measures: Construction Operating Hours. Limit all construction activities to the hours of 8:00 a.m. to 6:00 p.m. on weekdays and 9:00 a.m. to 6:00 p.m. on Saturdays. Construction activity shall be prohibited on Sundays and national holidays. Mufflers. During all construction phases, all construction equipment, fixed or mobile, shall be operated with closed engine doors and shall be equipped with properly operating and maintained mufflers consistent with manufacturers' standards. Silencing. Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with silencing devices consistent with manufacturer's standards, if available. Equipment shall be properly maintained, and the project applicant or owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications. Stationary Equipment. All stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receptors. Signage and Noise Complaint Coordinator The project applicant shall designate an on-site construction project manager who shall be responsible for responding to any complaints about construction noise. This person shall be responsible for responding to concerns of neighboring properties about construction noise disturbance and shall be available for responding to any construction noise complaints during the hours that construction is to take place. They shall also be responsible for determining the cause of the noise complaint (e.g., bad silencer) and shall require that reasonable measures be implemented to correct the problem. A toll-free telephone number shall be posted at construction site entrances for the duration of construction and provided in all notices (mailed, online website, and construction site postings) for receiving questions or	Project Applicant/ verified by the Planning & Development Services Department	Prior to issuance of a grading permit During grading and construction	City of Palo Alto Planning & Development Services Department

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
complaints during construction and shall also include procedures requiring that the on-site construction manager to respond to callers. The on-site construction project manager shall be required to track complaints pertaining to construction noise, ongoing throughout demolition, grading, and/or construction and shall notify the City's Community Development Director of each complaint occurrence. 6. Smart Back-Up Alarms. Mobile construction equipment shall have smart back-up alarms that automatically adjust the sound level of the alarm in response to ambient noise levels. 7. Equipment Idling. Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use. 8. Temporary Noise Barriers. Erect a temporary noise barrier along the eastern project boundary, and the southern and western project boundaries, where feasible, during demolition and grading/excavation phases. Temporary noise barriers shall be constructed with solid materials (e.g., wood) with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the barrier at a minimum height of 12 feet. Where a solid barrier is not feasible, sound blankets affixed to the construction fencing shall be used. If a sound blanket is used, the sound blanket must have a density of at least 1 pound per square foot with no gaps from the ground to the top of the construction fencing, and the sound blank shall be rated sound transmission class (STC) 32 or higher.			
N-2. Construction Vibration Control Plan. The construction contractor shall prepare a Vibration Control Plan prior to issuance of a grading permit. The Construction Vibration Control Plan shall specify the vibration reduction measures to be implemented during project construction to ensure vibration levels are reduced to 0.2 in/sec PPV at nearby residences. The measures specified in the Construction Vibration Control Plan shall be included on the building and grading plans and shall be implemented by the construction contractor during construction. At a minimum, the Construction Vibration Control Plan shall include the following measures: 1. For paving activities within 25 feet of offsite residences, a static roller shall be used in lieu of a vibratory roller. 2. For grading and earthwork activities (not including the drop-bucket or scoop) within 15 feet of offsite residences, off-road equipment shall be limited to 100 horsepower or less.	Project Applicant/ verified by the Planning & Development Services Department	Prior to issuance of a grading permit During grading and construction	City of Palo Alto Planning & Development Services Department
Tribal Cultural Resources			
TCR-1. Unanticipated Discovery of Tribal Cultural Resources. In the event that cultural resources of Native American origin are identified during implementation of	Project Applicant/ verified by the	During ground disturbing	City of Palo Alto Planning &

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
the proposed project, all earth-disturbing work within 50 feet of the find shall be temporarily suspended or redirected until an archaeologist and culturally affiliated Native American representative have evaluated the nature and significance of the find. If the City, in consultation with local Native Americans, determines that the resource is a tribal cultural resource and thus significant under CEQA, a mitigation plan shall be prepared and implemented in accordance with state guidelines and in consultation with local Native American group(s). The plan shall include avoidance of the resource or, if avoidance of the resource is infeasible, the plan shall outline the appropriate treatment of the resource in coordination with the culturally affiliated local Native American tribal representative and, if applicable, a qualified archaeologist. Examples of appropriate mitigation for tribal cultural resources include, but are not limited to, protecting the cultural character and integrity of the resource, protecting traditional use of the resource, protecting the confidentiality of the resource, or heritage recovery.	Planning & Development Services Department	activities	Development Services Department