

MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) was formulated based on the findings of the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the **Portola Valley Housing and Safety Elements Update and Conforming General Plan and Zoning Code Amendments** in the Town of Portola Valley. This MMRP complies with Section 15097 of the *CEQA Guidelines*, which requires that the Lead Agency “adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects.” The MMRP lists mitigation measures recommended in the IS/MND and identifies mitigation monitoring requirements.

The MMRP table below presents the mitigation measures identified in the IS/MND necessary to mitigate potentially significant impacts. Each mitigation measure is numbered according to the topical section to which it pertains in the IS/MND. As an example, Mitigation Measure AIR-1 is the first mitigation measure identified in the IS/MND in *Section III.C, Air Quality*.

The first column of the MMRP table identifies the mitigation measure. The second column identifies implementation action and responsibility, while the third column identifies the monitoring schedule or timing, and the fourth column names the party responsible for monitoring and the required monitoring action. The fifth column provides a place to record compliance with monitor dates and initials. These last columns will be used by the Town of Portola Valley to ensure that individual mitigation measures are monitored.

Mitigation Measures	Implementation Responsibility/Action	Timing	Monitoring Responsibility/Action	Date Completed/ Signature
A. AESTHETICS				
<i>Implementation of the project would not result in any significant aesthetics impacts.</i>				
B. AGRICULTURE AND FORESTRY RESOURCES				
<i>Implementation of the project would not result in any significant agriculture and forestry resources impacts.</i>				
C. AIR QUALITY				
<p>AIR-1: Dust Control Program. During project construction, the contractor shall implement a dust control program that includes the following measures recommended by the Bay Area Air Quality Management District (BAAQMD) and these measures shall be included in contract specifications for construction of the project:</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. 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. 	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the AIR-1 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Fully implement all exhaust control measures required by AIR-1. 	Ongoing throughout demolition, grading, trenching, and construction period.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Make regular, periodic visits to the project site to ensure that all dust control mitigation measures required by AIR-1 are being implemented. 	

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<ul style="list-style-type: none"> 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, Section 2485 of California Code of Regulations [CCR]). 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 at the construction site 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. 				
<p>AIR-2: Quantified Emissions. Proposed projects that would exceed the current BAAQMD's screening criteria for operational criteria air pollutant emissions shall retain a qualified air quality consultant to quantify criteria air pollutant emissions and identify measures, as needed, to reduce the project's average daily emissions below 54 pounds per day for ROG, NOx, and PM2.5 and 82 pounds per day for PM10, and reduce the maximum annual emissions below 10 tons per year for ROG, NOx, and PM2.5 and 15 tons per year for PM10. Quantified emissions and identified reduction measures shall be submitted to the Town for review and approval prior to the issuance of building permits.</p>	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the AIR-2 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Retain a qualified air quality consultant to quantify criteria air pollutant emissions and identify measures, as needed, to reduce the project's average daily emissions below the thresholds (as defined). 	<p>Prior to issuance of the first building permit.</p>	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Ensure an air quality consultant is retained by the contractor. Review and approve the quantified emissions and reduction measures as submitted by the qualified air quality consultant. 	

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	<ul style="list-style-type: none"> Have the qualified air quality consultant submit the quantified emissions and reduction measures to the Town for review and approval. 			
D. BIOLOGICAL RESOURCES				
<i>Implementation of the project would not result in any significant biological resources impacts. **Note the project is subject to the Town's standard biological restrictions contained in Tables 2-6 of Appendix D-1 (Special Status Species) attached as Exhibit A.</i>				
E. CULTURAL RESOURCES				
CULT-1: Accidental Discovery of Cultural Resources. If cultural material is discovered during ground-disturbing activities on the Ford Field housing site, all work must halt within 50 feet of the find until the qualified archaeologist can determine the significance. No soil shall be exported from within the 50-foot buffer around the find until a determination of significance is made. The qualified archaeologist will then also determine if continued archaeological monitoring, testing, or data recovery is warranted.	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the CULT-1 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Halt all construction activity within 50 feet of the project site if cultural material is discovered until appropriate action has been taken in accordance with CULT-1. 	Ongoing throughout demolition, grading, trenching, and construction period.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Ensure that a qualified archaeologist is retained by the contractor. 	
CULT-2: Accidental Discovery of Archaeological Resources. If archaeological material is discovered during ground-disturbing activities on The Sequoias or the Glen Oaks housing sites, all work must halt within 50 feet of the find until the qualified archaeologist can determine the significance. No soil shall be exported from within the 50-foot buffer around the find until a determination of significance is made. The qualified archaeologist will then also determine if continued archaeological monitoring, testing, or data recovery is warranted.	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the CULT-2 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Halt all construction activity within 50 feet of the project site if archaeological material is discovered until appropriate action has been taken in accordance with CULT-2. 	Ongoing throughout demolition, grading, trenching, and construction period.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Ensure that a qualified archaeologist is retained by the contractor. 	

Mitigation Measures	Implementation Responsibility/Action	Timing	Monitoring Responsibility/Action	Date Completed/Signature
CULT-3a: Halt Construction Activity, Evaluate Find, and Implement Mitigation. In the event that any previously unidentified cultural resource (historic/archaeological/paleontological/Native American) are uncovered during site preparation, excavation, or other construction activity, all such activity shall cease until these resources have been evaluated by a qualified consultant and specific measures can be implemented to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code.	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the CULT-3a requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Halt all construction activity if cultural resources (as defined) are uncovered until appropriate action has been taken in accordance with CULT-3a. 	Ongoing throughout demolition, grading, trenching, and construction period.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Ensure that a qualified consultant is retained by the contractor. 	
CULT-3b: Halt Construction Activity, Evaluate Remains, and Take Appropriate Action in Coordination with Native American Heritage Commission. In the event that any human remains are uncovered during site preparation, excavation, or other construction activity, all such activity shall cease until these resources have been evaluated by the County Coroner, and appropriate action taken in coordination with the Native American Heritage Commission, in accordance with section 7050.5 of the California Health and Safety Code or, if the remains are Native American, section 5097.98 of the California Public Resources Code.	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the CULT-3b requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Halt all construction activity if human remains are uncovered until appropriate action has been taken in accordance with CULT-3b. 	Ongoing throughout demolition, grading, trenching, and construction period.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Initiate coordination with the County Coroner and Native American Heritage Commission, if required. 	
F. ENERGY				
<i>Implementation of the project would not result in any significant energy impacts.</i>				

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G. GEOLOGY AND SOILS				
GEO-1: Paleontological Resources During Construction. Should any paleontological resources be encountered during construction activities, all ground disturbing activities within 50 feet of the find shall be stopped, the Town shall be notified by the applicant, and a qualified paleontologist shall be contacted and retained to assess the situation per Society of Vertebrate Paleontology standards. The qualified paleontologist shall consult with agencies, as appropriate, and make recommendations for the treatment of the discovery if found to be significant. If construction activities cannot avoid the paleontological resources, adverse effects to paleontological resources shall be mitigated. Mitigation may include monitoring, recording the fossil locality, data recovery and analysis, preparation of a technical report, and providing the fossil material and technical report to a paleontological repository, such as the University of California Museum of Paleontology. Public educational outreach may also be appropriate. Upon completion of the assessment, a report documenting methods, findings, and recommendations shall be prepared and submitted to the Town for review.	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the GEO-1 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Fully implement all exhaust control measures required by GEO-1. Contact a qualified paleontologist, if required. 	Ongoing throughout demolition, grading, trenching, and construction period.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Ensure that a qualified paleontologist is retained by the contractor. Review the technical report methods, findings, and recommendations, if required. 	
H. GREENHOUSE GAS EMISSIONS				
GHG-1: Off-Street Electric Vehicle Requirements. All developments shall demonstrate compliance with the off-street electric vehicle (EV) requirements in the most recently adopted version of CALGreen Tier 2 prior to the Town of Portola Valley issuing building occupancy permits. Alternatively, developments shall demonstrate consistency with a climate action plan adopted by the Town of Portola Valley that meets the criteria under State CEQA Guidelines Section 15183.5(b) and identifies	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the GHG-1 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Comply with off-street EV requirements as outlined in the Town Building Code, which 	Prior to issuance of the first building occupancy permit.	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Ensure developments are consistent with the Town Building Code, which meets the CALGreen Tier 2 EV requirements. 	

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community-wide measures that can be implemented to achieve the statewide GHG emissions targets of 40 percent below 1990 levels by 2030 and support the State's goal of achieving carbon neutrality by 2045.	meets the CalGreen Tier 2 EV requirements.			
<u>GHG-2: Implement GHG-1.</u>	See GHG-1.			

I. HAZARDS AND HAZARDOUS MATERIALS

HAZ-1: Phase I Environmental Site Assessment (ESA). The following requirements related to potential hazardous materials contamination would not apply to residential renovations/additions (due to the limited soil disturbance involved with such projects) or properties where past land uses have included only residential or undeveloped open space (i.e., no previous agricultural, industrial, commercial, or transportation related use) and where placement of undocumented fill material has not occurred. Evidence of such past land use must be demonstrated to the Town through historic aerial photos, maps, and/or building department records.

Prior to the Town issuing demolition, grading, or building permits for a proposed redevelopment or development project that would disturb soil (except for residential renovations/additions), the project applicant shall prepare a Phase I Environmental Site Assessment (ESA) for the project site and shall submit the Phase I ESA to the Town for review. If any Recognized Environmental Conditions (RECs) or other environmental concerns are identified in the Phase I ESA, the project applicant shall prepare a Phase II ESA to evaluate the RECs or other environmental concerns and shall submit the Phase II ESA to the Town for review and approval. Phase I and II ESA reports shall be prepared by a qualified environmental

Project Sponsor:

- Provide aerial photos, maps, and/or building department records for past land use to the Town.
- Have the qualified environmental professional prepare a Phase I ESA.
- Have the qualified environmental professional prepare a Phase II ESA, if required.
- Prepare a Soil and Groundwater Management Plan, if required.
- Take remedial actions at the project site, if required.
- Implement any recommendations for additional investigation and/or remedial action planning identified in the Phase I and II ESAs and submit to the Town evidence of approvals from the appropriate federal, State, or regional oversight agency(ies) for any proposed remedial action plans.
- Implement the recommendations of the third-party qualified environmental professional following their review of the Phase I and II ESAs, if required.

Prior to issuance of demolition, grading, or building permits.

Town of Portola Valley Planning & Building Department:

- Review the Phase I ESA.
- Review the Phase II ESA, if required.
- Select a third-party qualified environmental professional to review Phase I and II ESAs and proposed remedial action plans, if required.

Mitigation Measures	Implementation Responsibility/Action	Timing	Monitoring Responsibility/Action	Date Completed/ Signature
<p>professional and include recommendations for further investigation or remedial action, as appropriate, for hazardous materials contamination. Remedial actions may include, but not necessarily be limited to, the preparation and implementation of a Soil and Groundwater Management Plan, removal of hazardous materials containers/features (e.g., underground or aboveground storage tanks, drums, piping, sumps/vaults), proper destruction of water supply wells, removal and off-site disposal of contaminated soil or groundwater, in-situ treatment of contaminated soil or groundwater, or engineering/institutional controls (e.g., capping of contaminated soil, installation of vapor intrusion mitigation systems, and establishing deed restrictions).</p> <p>Prior to the Town issuing demolition, grading, or building permits, the project applicant shall implement any recommendations for additional investigation and/or remedial action planning identified in the Phase I and II ESAs and submit to the Town evidence of approvals from the appropriate federal, State, or regional oversight agency(ies) for any proposed remedial action plans.</p> <p>Prior to the Town issuing a certificate of occupancy, the project applicant shall submit to the Town evidence of approvals from the appropriate federal, State, or regional oversight agency(ies) for the completion of remedial action. If the project applicant indicates that in their view regulatory agency oversight/approval is not required for the proposed project based on the findings of the Phase II ESA and/or the proposed remedial actions, then the Phase I and II ESAs and proposed remedial action plans shall be reviewed by a third-party</p>	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Submit to the Town evidence of approvals from the appropriate federal, State, or regional oversight agency(ies) for the completion of remedial action, if required. 	<p>Prior to issuance of certificate of occupancy.</p>		

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qualified environmental professional selected by the Town and funded by the project applicant. The third-party qualified environmental professional shall either approve of the proposed investigation and/or remedial actions or provide recommendations for further investigation, additional/alternative remediation actions, and/or regulatory agency oversight for the project site. The project applicant shall implement the recommendations of the third-party qualified environmental professional prior to the Town issuing demolition, grading, or building permits.				
J. HYDROLOGY/WATER QUALITY				
<i>Implementation of the project would not result in any significant hydrology/water quality impacts.</i>				
K. LAND USE/PLANNING				
<i>Implementation of the project would not result in any significant land use/planning impacts.</i>				
L. MINERAL RESOURCES				
<i>Implementation of the project would not result in any significant mineral resources impacts.</i>				
M. NOISE				
NOISE-1: Screening-Level Vibration Analysis. Where new development is proposed in the vicinity of vibration-sensitive receptors, require a screening level vibration analysis. If a screening-level analysis shows that the project has the potential to substantially disturb vibration-sensitive activities or result in damage to structures, then a qualified professional shall prepare a detailed vibration impact assessment to determine appropriate design standards and methods of construction to avoid potential vibration impacts, if feasible.	<p>Project Sponsor:</p> <ul style="list-style-type: none"> Include the NOISE-1 requirements in the contract and performance standards for the project contractor. <p>Project Contractor:</p> <ul style="list-style-type: none"> Conduct a screening-level vibration analysis. Have a qualified professional prepare a detailed vibration impact assessment and submit to the Town. 	Prior to issuance of demolition, grading, or building permits	<p>Town of Portola Valley Planning & Building Department:</p> <ul style="list-style-type: none"> Review the detailed vibration impact assessment, if required. 	

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N. PARKS AND RECREATION				
<i>Implementation of the project would not result in any significant parks and recreation impacts.</i>				
O. POPULATION/HOUSING				
<i>Implementation of the project would not result in any significant population/housing impacts.</i>				
P. PUBLIC SERVICES				
<i>Implementation of the project would not result in any significant public services impacts.</i>				
Q. TRANSPORTATION				
<i>Implementation of the project would not result in any significant transportation impacts.</i>				
R. TRIBAL CULTURAL RESOURCES				
<u>TRIBE-4</u> : Implement CULT-3a and CULT-3b. See CULT-3a and CULT-3b.				
S. UTILITIES/SERVICE SYSTEMS				
<i>Implementation of the project would not result in any significant utilities/service systems impacts.</i>				
T. WILDFIRE				
<i>Implementation of the project would not result in any significant wildfire impacts.</i>				
U. MANDATORY FINDINGS OF SIGNIFICANCE				
<i>Implementation of the project would not result in any mandatory findings of significance.</i>				

Addendum to MMRP

Additional Policies

(Not CEQA Mitigation Measures)

Definitions

GP = General Plan

HE = Housing Element

MMRP = Mitigation monitoring and reporting program, part of the IS/MND

PC = Planning Commission

PCCM = Planning Commission Colleagues Memo dated February 8, 2023

Post HE Plan = Post-Adoption Housing Element Plan

TC = Town Council

TC HE Subcommittee = Town Council Post HE Plan Subcommittee

Addendum to MMRP

CEQA Guidelines/Local Guidance

Action	<ol style="list-style-type: none"> 1. Within 6 months after HE adoption, establish CEQA guidelines per 14 CCR Section 15022. 2. Within 8 months after HE adoption, establish local guidance concerning aesthetics, parks and recreation, public services, traffic and wildfire safety to guide future development, with reference, where available, to approaches taken by jurisdictions that have adopted similar measures (such as Gilroy, Los Angeles, San Diego, Oakland and Laguna Niguel).
Process	<p>Planning Staff and CEQA expert to address item 1 under this topic, and submit for TC approval. Planning Staff with CEQA and other consultants to develop framework for item 2 under this topic based on references to other jurisdictions adopting similar local parameters, then submit for discussion and review by the Planning Commission to tailor to community values and the Town's General Plan. It would then be submitted for adoption by the Town Council. One or more public awareness, education and comment meetings would be conducted after the initial PC study session.</p>
Comments	<p>The intent of item 1 under this topic is to comply with state requirements in adopting local CEQA guidelines, and the intent of item 2 under this topic is to clarify and standardize analysis and decision making in the environmental review process for future development projects in Town, with the intent to enhance the measures included in the IS/MND as appropriate to reflect our Town's ethos.</p> <p>Guidelines and features could be derived from existing examples taken from other jurisdictions and would serve to frame the analyses of future project-level environmental impacts and mitigation measures for projects that are not exempt from CEQA, and be informed by public input.</p> <p>Any required General Plan amendments that may be identified in the initial process as being required to effect these actions could be implemented in the next update of the General Plan unless legally required to be adopted earlier.</p>

Addendum to MMRP

Supplemental Safety Measures

Action	Coordinate and ensure that the Town's ongoing safety-related activities also consider the cumulative projected increase, in Town population and housing units arising out of HE adoption, and adopt mechanisms to coordinate with neighboring jurisdictions with respect to safety measures such as the evacuation plan.
Placement	Also referenced in Safety Element and HE (see policy 6)
Process	<p>Staff and consultants would reach out to committees involved in the Safety Element process to confirm that such committees assessed and made recommendations to the Planning Commission and Town Council with respect to adjustments to evacuation routes and planning, building codes, and other safety measures (to address fire, geologic, flooding and other risks), specifically arising from the cumulative increase in population and housing units in the HE, adopted fire maps, other elements of the GP, and best practices.</p> <p>These efforts would be made in conjunction with the ongoing Safety Element update, which will be completed to the extent feasible within 6-9 months after the HE adoption.</p> <p>The Post HE Plan will outline details of conducting assessments of safety measures periodically in light of actual and projected housing growth to enable methodical and proactive approach.</p>
Comments	The goal of this effort is to optimize consistency, beyond what is required by CEQA, across the Safety Element, HE, and GP with respect to safety in light of the increase in the Town's population under the new HE, complementing ongoing efforts already in process.