
MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation, Monitoring and Reporting Program (MMRP) has been prepared pursuant to the CEQA Guidelines, which state:

“When adopting a mitigated negative declaration, the lead agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to mitigate or avoid significant environmental effects” (§15074(d)) and;

“The Lead Agency may choose whether its program will monitor mitigation, report on mitigation, or both. “Reporting” generally consists of a written compliance review that is presented to the decision making body or authorized staff person. A report may be required at various stages during project implementation or upon completion of the mitigation measure. “Monitoring” is generally an ongoing or periodic process of project oversight. There is often no clear distinction between monitoring and reporting and the program best suited to ensuring compliance in any given instance will usually involve elements of both.” (§15097 (c))

The table beginning on the next page list the impacts, mitigation measures, and timing of the mitigation measure (when the measure will be implemented) related to the 405 Industrial Road Life Science Project. All of the mitigation measures listed here will be implemented by the City, the Applicant, or by their appointees.

According to CEQA Guidelines section 15126.4 (a) (2), “Mitigation measures must be fully enforceable through permit conditions, agreements, or other legally-binding instruments. In the case of the adoption of a plan, policy, regulation, or other public project, mitigation measures can be incorporated into the plan, policy, regulation, or project design.” Therefore, all mitigation measures as listed in this MMRP will be adopted by the City of San Carlos City Council when the project is approved.

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Impact	Mitigation Measure	Implementation and Timing	Monitoring Responsibility	Verified Implementation
AESTHETICS				
Impact AES-1: Light egress and glare generated by project interior electric lights could adversely impact surrounding sensitive light receptors during nighttime hours.	Mitigation Measure AES-1: Install Interior Automated Roller Shades. The project shall implement the automated shade recommendations for brand, fabric type and color, openness, and automation contained within the project Glare Study (LOISOS + UBBELOHDE, 2021). The interior roller shades shall be sourced from Ecoveil or SoHo and meet the specifications detailed in the Glare Study. If EcoVeil shades are selected, the project Applicant shall select the recommended screen series in the color silver birch, which provides the best balance of the performance criteria for the project. If SoHo shades are selected, the project Applicant shall select from the weave and color options recommended within the Glare Study (i.e., silver, sand, light grey, dove grey, or silver birch). The interior roller shades shall be oriented in the project building as follows, according to the “Interior Roller Shade Recommendation: Openness by Orientation” figure included on page 24 of the project Glare Study: <ul style="list-style-type: none"> • One (1) percent openness on the western façade on stories 3, 4, 5, and 6. • Three (3) percent openness with seats perpendicular to façade, one (1) percent openness with faces or back to façade on the eastern and southern facades on stories 3, 4, 5, and 6. 	Implementation: The Applicant shall be responsible for installing roller shades that meet the requirements specified in this mitigation measure. Timing: The City shall ensure these specifications are detailed on project plans. The City shall also review purchase orders for the shades to ensure they meet the specifications required by this mitigation measure.	Monitoring: The City shall confirm the interior shade specifications through purchase order.	Initials: _____ Date: _____

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	<ul style="list-style-type: none"> Three (3) percent openness on the northern façade on stories 3, 4, 5, and 6. <p>The project shall install roller shades with automated functionality that is responsive to sky conditions and solar positions to maximize daylight harvesting, maintain views, and limit electric light emanating from the building at night.</p> <p>The project shall install occupancy sensors for the building's interior electric lights to minimize electric light trespass during nighttime hours.</p> <p>The project Applicant may choose to prepare and submit a revised Glare Study to the City for City approval that specifies alternative automated shade recommendations for brand, fabric type and color, openness, and automation, as long as the revised specifications meet a resulting light egress luminance level of no more than 100 candelas per meter squared, the performance standard specified in the Glare Study prepared by LOISOS + UBBELOHDE. The revised Glare Study shall be prepared by a qualified Engineering or Architecture firm with specialty and expertise in preparing Glare Studies.</p>			
AIR QUALITY				
Impact AIR-1: Construction equipment could generate diesel particulate matter (DPM)	Mitigation Measure AIR-1: Utilize Tier IV Off-road Construction Equipment. To reduce potential, short-term adverse health risks associated with PM _{2.5} emissions,	Implementation: The Applicant shall include this requirement on all	Monitoring: The City shall review all appropriate bid, contract, and	Initials: _____ Date: _____

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emissions in excess of regulatory standards.	<p>including emissions of diesel particulate matter (DPM) generated during project construction activities, the City shall require the project Applicant and/or its designated contractors, contractor's representatives, or other appropriate personnel to comply with the following construction equipment restrictions:</p> <ul style="list-style-type: none"> • All mobile construction equipment greater than 50 horsepower in size shall meet with United States Environmental Protection Agency (U.S. EPA) and California Air Resources Board (CARB) Tier IV Exhaust Emission Standards. This may be achieved via the use of equipment with engines that have been certified to meet U.S. EPA and CARB Tier IV emissions standards, or through the use of equipment that has been retrofitted with a CARB-verified diesel emission control strategy (e.g., particulate filter) capable of reducing exhaust PM2.5 emissions to levels that meet U.S. EPA and CARB Tier IV emissions standards. <p>As an alternative to having all mobile construction equipment greater than 50 horsepower meet with U.S. EPA and CARB Tier IV Exhaust Emission Standards, the Applicant may prepare and submit a refined construction health risk assessment to the City once additional project-specific construction information is known (e.g.,</p>	<p>appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents.</p> <p>Timing: During construction activities.</p>	<p>engineering and site plan documents for inclusion of this requirement and verify the construction equipment utilized during construction meet the Tier IV emission standards.</p>	

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	specific construction equipment type, quantity, engine tier, and runtime by phase). The refined health risk assessment shall demonstrate and identify any measures necessary such that the proposed project's incremental carcinogenic health risk at nearby sensitive receptor locations is below the applicable BAAQMD threshold of 10 cancers in a million.			
BIOLOGICAL RESOURCES				
Impact BIO-1: The new six-story building will introduce new glass facades that could result in bird collisions that injures or kills birds. This may result in a cumulative loss of birds over time and in addition to other similar buildings planned in San Carlos that is a potentially significant impact under CEQA.	Mitigation Measure BIO-1: Bird-safe Design. The project shall implement the following bird-safe design considerations: <ul style="list-style-type: none"> • Use glazing or window coatings/markings that reduce bird strike hazard caused by transparency, reflectance, black hole or passage effect, etc., such as Guardian Bird 1st etch glass or similar. See recommendations by the American Bird Conservatory at https://abcbirds.org/, • Minimize plants or landscaped areas behind glass or on the rooftop, • Minimize concentrations of plantings adjacent to glass facades. 	Implementation: By the Applicant or its contractor. Timing: During the design phase.	Monitoring: The City shall verify during plan check that the project has incorporated additional bird collision avoidance measures to minimize bird deaths caused by collision with building windows.	Initials: _____ Date: _____
Impact BIO-2: The proposed pathway impacts the channel and requires permits from California Department of Fish and Wildlife (CDFW),	Mitigation BIO-2. Prepare Jurisdictional Wetland Delineation. If the Applicant decides to construct a pedestrian bridge from the Project site to the Holly Street / Industrial Road intersection in Caltrans right-of-way, a jurisdictional wetland	Implementation: By the Applicant or its contractor. Timing: Prior to bridge/pathway	Monitoring: The City shall verify that the Applicant has obtained the necessary approvals for the pathway/bridge from Caltrans and state	Initials: _____ Date: _____

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Regional Water Quality Control Board (RWQCB), and U.S. Army Corps of Engineers (USACE). The project may also impact the adjacent storm channel and mixed riparian vegetation along the drainage due to slope stability issues. The project will need to comply with the federal Clean Water Act, state Porter-Cologne Water Quality Act, and Fish and Game Code.	delineation shall be prepared. The jurisdictional wetland delineation shall inform the design the pathway and slope stabilization to avoid or minimize permanent impacts to the riparian zone and channel. Obtain permits as required and follow all conditions stipulated in the permits. The permit applications will determine the amount of impact, indicate the erosion control measures that will be used, and show how riparian vegetation will be protected/restored. If compensatory mitigation is required it may entail an offsite location or could include further restoration of riparian habitat along the channel. Since this is in the Caltrans right-of-way, the permits and any necessary mitigation will also involve Caltrans.	construction and site grading.	and federal resource agencies, as appropriate.	
Impact BIO-3. The project may require the removal of trees that are subject to the City's Interim Protected Tree Ordinance. The project may also result in damage to trees along the drainage within the Caltrans right of way.	Mitigation BIO-3. Protection of Trees. The project proponent shall obtain a permit to remove any tree(s) protected under the City's Interim Protected Tree Ordinance, as determined by an arborist, and shall also prepare a tree protection plan that includes a map of the tree protection zone and is included in the construction drawings and bid package. Removed trees will be replaced in accordance with the ordinance at the discretion of the Community Development Director. If any removed trees are within the jurisdiction of California Department of Fish and Wildlife (CDFW), and CDFW issues a Lake and Streambed Agreement for the project, the tree	Implementation: By the Applicant or its contractor. Timing: Prior to tree trimming or removal.	Monitoring: Certified Arborist Report, tree protection plan, review by the Community Development Director.	Initials: _____ Date: _____

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	replacement ratios shall comply with CDFW requirements.			
CULTURAL RESOURCES				
Impact CUL-1: Project construction personnel may not recognize buried archaeological resources during project demolition and construction.	<p>Mitigation Measure CUL-1: Conduct Archaeological Sensitivity Training. In anticipation of discovery of unknown archaeological resources during construction, Archaeological Sensitivity Training shall be carried out by a qualified archaeologist for all personnel who will engage in ground disturbing activities on the site. The training shall be conducted at the start of construction and prior to ground disturbance.</p> <p>The training shall include suitable photographic materials showing the kinds of artifacts and evidence of prehistoric archaeological sites likely to be found in the area, as well as written and verbal descriptions for archaeological resources and signs of potential archaeological discovery. The training will also include written materials describing what to do in the event of a discovery, or suspected discovery of archaeological resource. This language will include Mitigation Measures CUL-2 and CUL-3.</p>	<p>Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure prior to ground disturbance on the site.</p> <p>Timing: Prior to project ground disturbance.</p>	Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of cultural resource mitigation. The City shall ensure that archaeological training has been conducted for all personnel engaged in ground moving activities, prior to ground disturbance on the site.	<p>Initials: _____</p> <p>Date: _____</p>
Impact CUL-2: Project construction may unearth or disturb previously unidentified buried archaeological resources	Mitigation Measure CUL-2: Protection of Archaeological Resources. In the event archaeological resources are unearthed during ground-disturbing activities, all ground-disturbing activities within 100 feet of the find shall be halted so that the find	Implementation: The Applicant shall include these measures on all appropriate bid, contract, and	Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for	<p>Initials: _____</p> <p>Date: _____</p>

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during project demolition and construction.	<p>can be evaluated. Ground moving activities shall not be allowed to continue until a qualified archaeologist has examined the newly discovered artifact(s) and has evaluated the area of the find.</p> <p>All archaeological resources unearthed by project construction activities shall be evaluated by a qualified professional archaeologist, who meets the U.S. Secretary of the Interior's Professional Qualifications and Standards.</p> <p>All Native American artifacts (tribal finds) shall be considered as a significant Tribal Cultural Resource, pursuant to PRC 21074 until the lead agency has enough evidence to make a determination of significance.</p> <p>The City shall coordinate with the archaeologist to develop an appropriate treatment plan for the resources. The plan may include implementation of archaeological data recovery excavations to address treatment of the resource along with subsequent laboratory processing and analysis. If appropriate, the archaeologist may introduce archaeological monitoring on all or part of the site. An archaeological report will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.</p>	<p>engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event cultural resources are discovered.</p> <p>Timing: During all earth disturbing phases of Project construction.</p>	inclusion of cultural resource mitigation. An archaeological report, if appropriate, will be written detailing all archaeological finds and submitted to the City and the Northwest Information Center.	
Impact CUL-3: Project construction, particularly excavation of the underground parking	Mitigation Measure CUL-3: Protection of Human Remains. If human remains are unearthed during ground-disturbing activities, Section 7050.5(b) of the	Implementation: The Applicant shall include these measures on all	Monitoring: The City shall review all appropriate bid, contract, and	Initials: _____ Date: _____

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garage, may disturb human remains during project demolition and construction.	<p>California Health and Safety code will be implemented. Section 7050.5(b) states:</p> <p>In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27492 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner and cause of death, and the recommendations concerning treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code.</p> <p>The County Coroner, upon recognizing the remains as being of Native American origin, is responsible to contact the NAHC within 24 hours. The Commission has various powers and duties, including the appointment of a Most Likely Descendant</p>	<p>appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event human remains are discovered.</p> <p>Timing: During all earth moving phases of project construction.</p>	<p>engineering and site plan documents for inclusion of cultural resource mitigation. The County Coroner will detail the findings in a coroner's report.</p>	

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	(MLD) to the Project. The MLD, or in lieu of the MLD, the NAHC, has the responsibility to provide guidance as to the ultimate disposition of any Native American remains.			
GEOLOGY AND SOILS				
Impact GEO-1: Project demolition and construction could unearth paleontological resources, including fossils.	Mitigation Measure GEO-1: Protection of Paleontological Resources. If paleontological resources are discovered during construction, ground-disturbing activities shall halt immediately until a qualified paleontologist can assess the significance of the discovery. Depending on determinations made by the paleontologist, work may either be allowed to continue once the discovery has been recorded, or if recommended by the paleontologist, recovery of the resource may be required, in which ground-disturbing activity within the area of the find will be temporarily halted until the resource is recovered. If treatment and salvage is required, recommendations shall be consistent with Society of Vertebrate Paleontology guidelines and current professional standards.	Implementation: The Applicant shall include these measures on all appropriate bid, contract, and engineering and site plan (e.g., building, grading, and improvement plans) documents. The Applicant and/or its contractor(s) shall implement this measure in the event any paleontological resources are discovered.	Monitoring: The City shall review all appropriate bid, contract, and engineering and site plan documents for inclusion of paleontological mitigation. If paleontological resources are uncovered, a report shall be prepared by the qualified paleontologist describing the find and its deposition.	Initials: _____ Date: _____
TRANSPORTATION				
Impact TRANS-1: Vehicle trips and vehicle miles traveled (VMT) generated by operation of the project could be inconsistent with City Municipal Code Chapter	Mitigation Measure TRANS-1: Additional TDM Plan Requirements. A Transportation Demand Management (TDM) Plan shall be prepared and implemented that includes, at a minimum, the following elements:	Implementation: The Applicant and/or its Transportation Coordinator shall be responsible for the implementation of the TDM Plan. An	Monitoring: As specified in City of San Carlos Municipal Code Section 18.25.080.	Initials: _____ Date: _____

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18.25 and the City's VMT policy if not properly tracked and enforced.	<ol style="list-style-type: none"> 1. The project Applicant will designate an on-site Transportation Coordinator that will be responsible for implementation of the TDM Plan, including providing relevant TDM trip reduction and program information to all employees on site, and arranging for independent annual monitoring and employee surveys. 2. The project Applicant and the Project's Transportation Coordinator will be responsible for ensuring that the TDM Plan is implemented each year and an annual monitoring report is submitted to the City of San Carlos. 3. The TDM Plan monitoring will be prepared by an independent consultant per City of San Carlos Municipal Code Section 18.25.080. Regular monitoring will be necessary to ensure that the implemented TDM measures are effective and achieve the 20-percent trip reduction requirement. 4. Consistent with common traffic engineering data collection practices, traffic conditions will be monitored annually by means of a.m. and p.m. commute hour driveway counts at each project access point. The counts will include daily and peak hour traffic counts conducted between 7:00 a.m. and 9:00 a.m. and between 4:00 p.m. and 6:00 p.m. on three non-consecutive days per year on typical weekdays (Tuesday, 	<p>independent consultant shall conduct the monitoring for the TDM Plan.</p> <p>Timing: During project operation.</p>		

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	<p>Wednesday, or Thursday) during the fall when school is in session. Mechanical tube counts or video counts may be used. The peak 60-minute period will be calculated for both the a.m. and p.m. peak period.</p> <p>5. An annual employee survey will be conducted by an independent consultant to determine employee transportation mode choice (e.g., drive alone, carpool, bus, Caltrain, etc.). This annual commuter survey should be formatted as a general survey including non-transportation questions (e.g., satisfaction with property management, activities, etc.) to increase the response rate.</p> <p>6. The site Transportation Coordinator will work with an independent consultant to obtain traffic count data, implement the annual employee commuter surveys and document all findings in a TDM monitoring report. The annual monitoring report will be submitted to the City of San Carlos by the Transportation Coordinator. The TDM Plan monitoring data will be reviewed by the City to assess whether the goal of a 20-percent trip reduction is being met. This will be assessed by comparing the driveway counts to the trip targets of this TDM plan report.</p> <p>7. If the City of San Carlos determines that the 20-percent trip reduction goal is not</p>			

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	<p>being achieved, additional TDM measures may be implemented. Modifications to the TDM Plan may include additional programs or substitute activities for achieving vehicle trip reductions. The annual TDM monitoring report will describe any planned modifications to the TDM program such that the 20-percent trip reduction is maintained or achieved by the following monitoring cycle.</p> <p>8. If the 20-percent trip reduction goal is not met based on a five-year review of TDM monitoring reports, the City may require more stringent TDM measures be implemented along with a six-month monitoring schedule. If the 20-percent trip reduction goal is not achieved by year six, then the City may initiate a review of the building occupancy permit, condition use permit, or enact other measures (including fines) aimed at achieving a minimum of 20-percent trip reduction.</p>			

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TRIBAL CULTURAL RESOURCES				
Impact TRIB-1: Project construction could disturb or damage unknown tribal cultural resources resulting in an adverse change in the significance of the tribal resource.	See Mitigation Measure CUL-1.	Implementation: See Mitigation Measure CUL-1. Timing: See Mitigation Measure CUL-1.	Monitoring: See Mitigation Measure CUL-1.	Initials: _____ Date: _____
	See Mitigation Measure CUL-2.	Implementation: See Mitigation Measure CUL-2. Timing: See Mitigation Measure CUL-2.	Monitoring: See Mitigation Measure CUL-2.	Initials: _____ Date: _____