

**MITIGATION MONITORING OR REPORTING PROGRAM**

**Los Altos High School Lights and Public Address System  
Project**

**Mountain View Los Altos Union High School District**

**April 2020**

# P R E F A C E

Section 21081 of the California Environmental Quality Act (CEQA) requires a Lead Agency to adopt a Mitigation Monitoring or Reporting Program whenever it approves a project for which measures have been required to mitigate or avoid significant effects on the environment. The purpose of the monitoring or reporting program is to ensure compliance with the mitigation measures during project implementation.

The Environmental Impact Report for the *Los Altos High School Lights and Public Address System Project* concluded that the implementation of the project could result in significant effects on the environment and mitigation measures were incorporated into the proposed project or are required as a condition of project approval. This Mitigation Monitoring or Reporting Program addresses those measures in terms of how and when they will be implemented.

This document does *not* discuss those subjects for which the Environmental Impact Report concluded that the impacts from implementation of the project would be less than significant and for which no standard or mitigation measures would be required.

**LOS ALTOS HIGH SCHOOL LIGHTS AND PUBLIC ADDRESS SYSTEM PROJECT**

Environmental Impacts	Mitigation and Avoidance Measures	Responsibility for Compliance	Method of Compliance and Oversight of Implementation	Timing of Compliance
<b>AIR QUALITY</b>				
<p><b>Impact AIR-2:</b> The project, with implementation of mitigation measures, would not result in a cumulatively considerable net increase of any criteria pollutants for which the project region is non-attainment under an applicable federal or state ambient air quality standard. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p>	<p><b>MM AIR-2.1:</b> During any construction period ground disturbance, the School District shall ensure that the project contractor implement measures to control dust and exhaust. Implementation of the measures recommended by BAAQMD and listed below would reduce the air quality impacts associated with grading and new construction to a less than significant level. The contract shall implement the following best management practices that are required of all projects:</p> <ul style="list-style-type: none"> <li>• All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.</li> <li>• All haul trucks transporting soil, sand, or other loose material off-site shall be covered.</li> <li>• 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.</li> <li>• All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).</li> <li>• 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.</li> </ul>	<p>School District and contractors.</p>	<p>All measures will be printed on all construction documents, contracts, and project plans.</p> <p>Oversight of implementation by the Mountain View Los Altos High School District (District).</p>	<p>Prior to and during any construction activities, as specified.</p>

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	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Post a public visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.</li> </ul>			
<p><b>Impact AIR-3:</b> The proposed project, with implementation of mitigation measures, would not expose sensitive receptors to substantial pollutant concentrations. <b>(Less than Significant)</b></p>	<p><b>MM AIR-3.1:</b> The project shall use equipment that has low DPM or zero emissions, implementing the following measures:</p> <ul style="list-style-type: none"> <li>• All mobile diesel-powered off-road equipment larger than 25 horsepower and operating on the site for more than two days shall meet U.S. EPA particulate matter emissions standards for Tier 4 or use engines that include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices (VDECs).</li> </ul>	<p>School District and contractors.</p>	<p>All measures will be printed on all construction documents, contracts, and project plans.</p>	<p>Prior to and during any construction activities, as specified.</p>

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<b>Impact with Mitigation Incorporated)</b>	<p>Alternatively (or in combination), the use of alternatively-fueled or electric equipment (i.e., non-diesel) would be consistent with this requirement.</p> <ul style="list-style-type: none"> <li>• Avoid diesel generator use by supplying line power to the construction site and limiting the use of diesel generators to no more than 50 total hours.</li> <li>• Avoid staging of construction equipment near portions of the site that are adjacent to residences.</li> </ul>		Oversight of implementation by the District.	
<b>BIOLOGICAL RESOURCES</b>				
<b>Impact BIO-4:</b> The project, with implementation of mitigation measures, would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. <b>(Less than Significant Impact with Mitigation Incorporated)</b>	<p><b>MM BIO-4.1:</b> The District shall schedule construction activities to avoid the nesting season, to the extent feasible. The nesting season for most birds, including most raptors in the San Francisco Bay area extends from February 1<sup>st</sup> through August 31<sup>st</sup> (inclusive).</p> <p>If it is not possible to schedule demolition and construction between September 1st and January 31st (inclusive) to avoid the nesting season, pre-construction surveys for nesting raptors and other migratory nesting birds shall be conducted by a qualified ornithologist to identify active nests that may be disturbed during project implementation on-site and within 250 feet of the site. The pre-construction survey for nesting birds shall be conducted prior to initiation of construction, demolition activities, or tree removals no more than 14 days during the early part of the nesting season between February 1st and April 30th</p>	School District and contractors.	The District will hire a qualified biologist to survey during the breeding season and the survey results will be provided to the District. Any recommendations will be implemented as long as necessary during the breeding season.	Prior to and during any construction activities, as specified.

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	<p>(inclusive) and no more than 30 days prior to initiation of these activities during the late part of the nesting season between May 1st and August 31st (inclusive).</p> <p>If an active nest is found in or close enough to the project area to be disturbed by construction activities, a qualified ornithologist, in consultation with the California Department of Fish and Wildlife, shall determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 100 feet for other birds) around the nest, to ensure that raptor or migratory bird nests would not be disturbed during ground disturbing activities. The construction-free buffer zones shall be maintained until after the nesting season has ended and/or the ornithologist has determined that the nest is no longer active.</p>		Oversight of implementation by the District.	
<p><b>Impact BIO-5:</b> The project, with implementation of mitigation measures, would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p>	<p><b>MM BIO-5.1:</b> The proposed project shall implement the following tree protection measures:</p> <ul style="list-style-type: none"> <li>• Prior to commencement of construction, construction fencing shall be placed around the drip line of all trees proposed for preservation.</li> <li>• No grading or other construction shall occur within the drip line of any tree proposed for preservation except in conformance with a Tree Protection Plan.</li> <li>• No vehicle, equipment or materials shall be parked or stored within the drip line of any tree proposed for preservation.</li> </ul>	School District and contractors.	All measures will be printed on all construction documents, contracts, and project plans. If grading or other construction would occur within the drip line of any existing trees, a	Prior to and during any construction activities, as specified.

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	<ul style="list-style-type: none"> <li>No signs, wires, or any other object shall be attached to any tree.</li> </ul>		Tree Protection Plan shall be prepared by an arborist for District approval and implemented by the contractor.	

**CULTURAL RESOURCES**

<p><b>Impact CUL-2:</b> The project, with implementation of mitigation measures, would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p>	<p><b>MM CUL-2.1:</b> In the event that cultural resources are found, all work within 50 feet of the find will stop and a qualified professional archaeologist or paleontologist will examine the find. If the find is determined to be significant, treatment recommendations will be developed and implemented before earthmoving or construction activities can recommence within the designated resource area.</p>	School District and contractors.	<p>All measures will be printed on all construction documents, contracts, and project plans</p> <p>Oversight of implementation by the District.</p>	During any construction activities, as specified.
<p><b>Impact CUL-3:</b> The project, with implementation of mitigation measures, would not disturb any human remains, including</p>	<p><b>MM CUL-3.1:</b> If human remains are discovered during construction, construction activities that could disturb the remains and any associated artifacts would halt and the project proponent shall contact the local Coroner’s Office. The Coroner shall make a determination as to whether the remains are of Native American origin or whether an</p>	School District and contractors.	All measures will be printed on all construction documents, contracts, and project plans	During any construction activities, as specified.

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those interred outside of dedicated cemeteries. <b>(Less than Significant Impact with Mitigation Incorporated)</b>	investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the Native American Heritage Commission (NAHC). The NAHC would then name a Most Likely Descendant (MLD) to advise the project proponent on the manner of exposure and removal of burials and associated grave goods, and to help designate a place for the reburial of these materials. The MLD may make any recommendations they feel are culturally appropriate which may include keeping the remains in place.		Oversight of implementation by the District.	

**GEOLOGY AND SOILS**

<b>Impact GEO-6:</b> The project, with implementation of mitigation measures, would not directly or indirectly destroy a unique paleontological resource or site or unique geological feature. <b>(Less than Significant Impact with Mitigation Incorporated)</b>	<b>MM GEO-6.1:</b> If vertebrate fossils are discovered during construction, all work on the site will stop immediately until a qualified professional paleontologist can assess the nature and importance of the find and recommend appropriate treatment. Treatment may include preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The District will be responsible for implementing the recommendations of the paleontological monitor, and a final report documenting the implementation of the treatment program shall be prepared.	School District and contractors.	All measures will be printed on all construction documents, contracts, and project plans  Oversight of implementation by the District.	Prior to and during construction activities, as specified.
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**HAZARDOUS MATERIALS**

<b>Impact HAZ-2:</b> The project, with implementation of	<b>MM HAZ-2.1:</b> The project proposes to implement the following mitigation measures to reduce impacts from	School District and contractors.	All measures will be printed on all construction	Prior to construction
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<p>mitigation measures, would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. <b>(Less than Significant Impact with Mitigation Incorporated)</b></p>	<p>exposure to OCPs, arsenic, lead and NOA to a less than significant level:</p> <ul style="list-style-type: none"> <li>• Prior to excavation at the project site, additional soil sampling/testing shall be completed to define the lateral and vertical extent of the impacted soil.</li> <li>• The soil detected above the regulatory standards for residential uses shall be excavated and disposed off-site at a permitted facility.</li> <li>• The soils that remain shall undergo confirmation sampling to ensure their concentrations are below the appropriate regulatory thresholds.</li> </ul> <p><b>MM HAZ – 2.2:</b> Extensive dust control along with perimeter air monitoring confirmation sampling shall be implemented during all ground-disturbing construction activities to prevent spreading of asbestos fibers.</p> <p><b>MM HAZ – 2.3:</b> The soil in the landscaped areas shall be capped with at least six inches of clean imported soils and the soils in the high traffic areas of natural turf on the project site shall be capped with at least 12-inches of clean imported soil or hardscape to limit future release of asbestos fibers. Buildings, hardscape, artificial turf, and imported NOA-free soils are acceptable caps. Excess soils with NOA if off-hauled will have to be disposed at an appropriately licensed landfill.</p>		<p>documents, contracts, and project plans</p> <p>Oversight of implementation by the District.</p>	<p>activities, as specified.</p>

**SOURCE:** Mountain View Los Altos Union High School District. *Los Altos High School Lights and PA System Project Environmental Impact Report*. April 2020.