

# MITIGATION MONITORING AND REPORTING PROGRAM – ADDITIONAL HOUSING ALTERNATIVE A

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## Section 1: Authority

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Section 21081.6 of the *California Environmental Quality Act*, known as CEQA (Public Resources Code Section 21000 et seq.), to provide for the monitoring of mitigation measures required for the proposed Stanford University 2018 General Use Permit, as set forth in the Final Environmental Impact Report (Final EIR) prepared for Additional Housing Alternative A. This report will be kept on file at the County of Santa Clara Planning Office, County Government Center, 70 West Hedding, 7th Floor, East Wing, San Jose, California.

As described in Section 15097 of the *CEQA Guidelines*, “[r]eporting generally consists of a written compliance review that is presented to a 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.” This MMRP includes both reporting and monitoring elements, as appropriate for implementation of each mitigation or improvement measure.

## Section 2: Content of MMRP Matrix

**Table A** identifies the environmental issue areas for which actions/measures are identified; the required actions/measures; the timeframe for implementing, monitoring, and reporting on these measures; the responsible implementing, monitoring and reporting parties; and action needed to verify compliance/completion of the measures.

## Section 3: Implementation and Enforcement of Measures

This MMRP includes all mitigation measures that are applicable to Additional Housing Alternative A. The intent of the MMRP is to ensure the effective implementation and enforcement of adopted mitigation measures. As discussed in the Final EIR, the mitigation measures included in the MMRP are measures required to avoid or lessen significant impacts of the project.

The MMRP matrix identifies the mitigation schedule and the parties responsible for implementing, monitoring and reporting on the implementation of the measures listed in Table A. As the CEQA lead agency for the Project, the County is principally responsible for MMRP monitoring and enforcement. In addition, as provided in CEQA Guidelines Section 15097(a), the County may delegate MMRP monitoring responsibilities to other public agencies, either working with other local governments through their permitting or regulatory authorities, or through memoranda of understanding that the County enters into with other entities.

**IMPORTANT REQUIREMENT:**

**Approved Consultants.** Where Stanford is required by the Conditions of Approval and the Mitigation Monitoring and Reporting Program to retain a qualified consulting expert approved by the County, Stanford shall submit a request to the County for approval. The request should identify the consultant, describe the work to be completed and the anticipated timeframe, and include the consultant’s qualifications to complete the specified task. Stanford may retain the consultant only upon written approval of the request by the Director.

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Visual and Scenic Resources</b>				
<p><b>Mitigation Measure 7A.1-4:</b> Stanford shall submit a lighting plan for approval by the Director, as part of an Architecture and Site Approval (ASA) review, for each development project that would include exterior light sources. The plan shall show the extent of illumination that would be projected from proposed outdoor lighting. State-of-the-art luminaries shall be used where necessary, with high beam efficiency, sharp cut-off, and glare and spill control. Upward glow shall not be allowed in residential or academic uses.</p>	Stanford	During project design/review of development project	County of Santa Clara	Include in MMRP Report; Complete upon approval of lighting plan
<b>Air Quality</b>				
<p><b>Mitigation Measure 7A.2-2: Best Management Practices for Controlling Particulate Emissions.</b> Stanford shall require all construction contractors to implement the following measures:</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 sweepers is prohibited;</li> <li>• All vehicle speeds on unpaved roads shall be limited to 15 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> <li>• Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes. 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 manufacturers' specifications. All equipment shall be checked by a certified visible emissions evaluator; and</li> <li>• Post a publicly visible sign with the telephone number and person to be contacted 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>	Stanford	During construction of development project	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction of development project

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Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Air Quality (cont.)</b>				
<p><b>Mitigation Measure 7A.2-3(a): Health Risk Screening for Construction Projects.</b> Prior to approval of an individual project, Stanford shall conduct a project-specific health risk screening using the screening distances presented in Table 7A.2-2 of the EIR and submit it to the Director for peer review and approval. If the individual project is located further from sensitive receptors than the minimum distance identified in Table 7A.2-2 of the EIR, then no further construction health risk assessment or additional mitigation is required. If the construction project is closer than the specified minimum distance, then a project-specific Health Risk Assessment shall be prepared, as outlined in Mitigation Measure 7A.2-3(b).</p>	Stanford	Prior to approval of development project	County of Santa Clara	Include in MMRP Report; Complete upon completion of health risk screening by Stanford and approval by the County
<p><b>Mitigation Measure 7A.2-3(b): Project-Specific Health Risk Analysis.</b> If the screening criteria in Table 7A.2-2 of the EIR are not met, Stanford shall prepare and submit to the Director for peer review and approval a project-specific health risk analysis demonstrating that project construction activities will not result in a significant acute, chronic non-cancer or cancer-related health risk to sensitive receptors. As a performance standard, any subsequent project-specific health risk analysis must demonstrate an excess cancer risk level of 10-in-1 million or less, a non-cancer (i.e., chronic or acute) hazard index of 1.0 or less, and an incremental increase an annual average PM2.5 concentration of no more than 0.3 microgram per cubic meter.</p>	Stanford	Prior to approval of development project; if screening criteria if Mitigation Measure 5.2-3(a) is not met	County of Santa Clara	Include in MMRP Report; Complete upon completion of project-specific health risk analysis by Stanford and approval by the County
<p><b>Mitigation Measure 7A.2-5: Laboratory Fume Hood Emission Control.</b> For any individual project that contains more than 25,000 square feet of emissions-generating laboratory space within a building and 50 fume hoods, Stanford shall conduct a health risk screening analysis and obtain a permit from the BAAQMD for the proposed individual project; this permit may be required either prior to or as a condition of approval of the proposed individual project. In accordance with BAAQMD Rules 2-1 and 2-5, new sources of emissions must implement Best Available Control Technology for Toxics (T-BACT) if individual source risks exceed 1.0 in a million for cancer and/or chronic hazard index is greater than 0.20. Additionally, a permit will be denied if project cancer risk exceeds 10.0 in a million or if the chronic or acute hazard index exceeds 1.0. Compliance with BAAQMD rules will ensure that new laboratory operations will not result in a significant health risk impact.</p>	Stanford	Prior to approval of development project	County of Santa Clara, BAAQMD	Include in MMRP Report; Complete upon completion of health risk screening analysis and issuance of permit from the BAAQMD

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<b>Biological Resources</b>				
<p><b>Mitigation Measure 7A.3-1(a):</b> <i>Avoid tree removal and commencement of outdoor construction activities during nesting season.</i> Tree removal or pruning associated with project construction and commencement of outdoor project construction activities shall be avoided from February 1 through August 31, the primary local bird nesting season, to the extent feasible. If no tree removal or pruning associated with project construction is proposed during the nesting period and outdoor project construction activities will commence outside the nesting period, no surveys for active bird nests are required.</p> <p>If Stanford proposes to initiate construction during the February 1 to August 31 nesting season, it shall notify the County.</p>	Stanford	Outdoor construction occurring between September 1 and January 31	County of Santa Clara	Include in MMRP Report; Complete upon tree removal and outdoor construction activities outside of nesting season
<p><b>Mitigation Measure 7A.3-1(b):</b> <i>Survey for active bird nests within 250 feet of construction sites.</i> If the Director determines that compliance with Mitigation Measure 7A.3-1(a) is not feasible because the timing of a construction project necessitates construction-related tree removal/pruning during the nesting season and/or commencement of outdoor construction activities during the nesting season, within seven days prior to the proposed start of construction activities an independent, qualified biologist approved by the County shall conduct a nesting bird survey of all potential habitat at the construction site and within 250 feet of the perimeter of the construction site. The survey results shall be provided to the Director prior to issuance of site demolition, grading or building permits.</p>	Stanford (using biologist approved by County)	<p><i>MM 7A.3-1b to 7A.3-1(e): Outdoor construction occurring between February 1 and August 31.</i></p> <p>Survey within seven days prior to construction; submit survey results prior to issuance of site demolition, grading or building permits</p>	County of Santa Clara	Include in MMRP Report; Complete upon completion of nesting bird survey and County of Santa Clara receipt of survey results
<p><b>Mitigation Measure 7A.3-1(c):</b> <i>Minimize impacts to active bird nests.</i> If any active nests are detected during the pre-construction survey, an independent, qualified biologist approved by the County shall recommend a work-exclusion buffer zone that shall be designated around the active nest to allow for both the successful fledging of the birds and initiation of work on some portions of the project site. The work-exclusion zone(s) shall be reviewed and approved by the Director prior to commencement of construction. A qualified biologist shall monitor any occupied nest located within a protective buffer zone in order to determine if the designated buffer zone is effective and when the buffer zone is no longer needed. If the buffer zone is determined to be ineffective, its size shall be increased until it is effective, or work shall cease until the young have fledged and are independent of the nest.</p>	Stanford (using biologist approved by County)	Prior to commencement of construction, identify work-exclusion zone(s). During construction, monitor within buffer zone	County of Santa Clara	Include in MMRP Report; Complete upon approval of work-exclusion zone(s) by County of Santa Clara
<p><b>Mitigation Measure 7A.3-1(d):</b> <i>Delay activity.</i> If no sufficient work-exclusion zone(s) are possible, then there shall be a delay in the start of construction until the active nest is no longer occupied. A qualified biologist approved by the County shall monitor any occupied nest to determine when the nest is no longer used.</p>	Stanford (using biologist approved by County)	Prior to construction	County of Santa Clara	Include in MMRP Report; Complete upon verification that nest is no longer used and County of Santa Clara receipt of supporting documentation

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<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-1(e): Remove nest starts.</b> A qualified biologist approved by the County can visit project sites at any time prior to tree removal or the initiation of outdoor construction work in order to find and remove nest starts. Nest starts are defined as nests which do not have eggs or nestlings present. This activity will minimize impacts to birds as they will generally move elsewhere and restart their nest building process.</p>	Stanford (using biologist approved by County)	Remove nests prior to tree removal or outdoor construction work	County of Santa Clara	Include in MMRP Report; Complete upon nest removal and County receipt of supporting documentation
<p><b>Mitigation Measure 7A.3-2(a): Conduct pre-project survey.</b> Prior to project construction, an independent, qualified bat biologist approved by the County shall conduct a pre-construction survey for roosting bats in trees to be removed or pruned and structures to be demolished within the work area and within a 50-foot radius of the work area. The survey results shall be provided to the Director prior to issuance of site demolition, grading or building permits. If no roosting bats are found, no further action is required. If a bat roost is found, Stanford shall implement the following measures to avoid impacts on roosting bats.</p>	Stanford (using biologist approved by County)	Prior to construction; submit survey results prior to issuance of site demolition, grading or building permits	County of Santa Clara	Include in MMRP Report; Complete upon completion of roosting bat survey and County receipt of survey results
<p><b>Mitigation Measure 7A.3-2(b): Evict non-maternal roosts.</b> If a non-maternal roost of bats is found in a tree or structure to be removed or demolished as part of project construction, the individuals shall be safely evicted, under the direction of a qualified bat biologist, by opening the roosting area to allow airflow through the cavity. Removal or demolition should occur no sooner than at least two nights after the initial minor site modification (to alter airflow). This action allows bats to leave during darkness, thus increasing their chance of finding new roosts with a minimum of disturbance. Departure of the bats from the construction area shall be confirmed with a follow-up survey by a qualified bat biologist prior to start of construction.</p>	Stanford (using biologist approved by County)	Prior to construction; submit follow-up survey results prior to construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of eviction of non-maternal roosts and County receipt of supporting documentation
<p><b>Mitigation Measure 7A.3-2(c): Avoid maternal roosting areas.</b> If active maternity roosts are found in trees or structures that will be removed or demolished as part of project construction, tree removal or demolition of that structure shall commence and be completed before maternity colonies form (generally before March 1) or shall not commence until after young are flying (generally after July 31). Active maternal roosts shall not be disturbed.</p>	Stanford (using biologist approved by County)	August 1 through February 28	County of Santa Clara	Include in MMRP Report; Complete upon tree removal or demolition in timing specified in measure
<p><b>Mitigation Measure 7A.3-2(d): Develop and employ bat nest box plan.</b> If special-status bats are found in trees or structures to be removed or demolished as part of project construction, Stanford shall develop and implement a Bat Nest Box Plan for the Stanford campus employing current bat nest box technology. The design and placement of nest boxes shall be reviewed and approved by an independent, qualified bat biologist approved by the County, and shall be consistent with Stanford's anticipated long-term planning and development activities.</p>	Stanford (using biologist approved by County)	Prior to construction; prepare Bat Nest Box Plan. During construction implement Bat Nest Box Plan	County of Santa Clara	Include in MMRP Report; Complete upon completion of plan and approval by the County

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<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-3(a): Surveys.</b> Prior to any clearing of vegetation within the Lathrop Development District, Lagunita and adjacent uplands (see <b>Figure 5</b> of the Conditions), jurisdictional waterways/wetlands, or lands on the Project site outside the Academic Growth Boundary, an independent, qualified biologist approved by the County shall conduct a survey for San Francisco dusky-footed woodrat nests within the project area. The survey results shall be provided to the Director for approval prior to issuance of site demolition, grading or building permits.</p>	Stanford (using biologist approved by County)	Prior to vegetation clearing; submit survey results prior to issuance of site demolition, grading or building permits	County of Santa Clara	Include in MMRP Report; Complete upon completion of survey and County receipt of survey results
<p><b>Mitigation Measure 7A.3-3(b): Avoidance.</b> Where feasible, an exclusion buffer of at least 10 feet from these nests shall be established and clearly demarcated to avoid moving or bumping the nests or the logs or branches on which the nests rest.</p>	Stanford (using biologist approved by County)	Establish exclusion buffer prior to and during construction	County of Santa Clara	Include in MMRP Report; Complete upon establishing exclusion buffer and County receipt of supporting documentation
<p><b>Mitigation Measure 7A.3-3(c): Mitigation.</b> If establishing a buffer and avoiding the nests is not feasible, the nests shall be dismantled and the nesting material moved to a new location outside the project's impact areas so that it can be used by woodrats to construct new nests. Prior to nest deconstruction, each active nest shall be disturbed by a qualified wildlife biologist approved by the County, to the degree that all woodrats leave the nest and seek cover out of the impact area. Whether the nest is on the ground or in a tree, the nest shall be slightly disturbed (nudged) to cause the woodrats to flee. For tree nests, a tarp shall be placed below the nest and the nest dismantled using hand tools (either from the ground or from a lift). The nest material shall then be piled at the base of a nearby tree or large shrub outside of the impact area.</p>	Stanford (using biologist approved by County)	Prior to construction	County of Santa Clara	Include in MMRP Report; Complete upon relocating nests and County receipt of supporting documentation
<p><b>Mitigation Measure 7A.3-4(a): Surveys.</b> If construction is proposed within any jurisdictional waterways/wetland areas, Lagunita basin and adjacent uplands (see <b>Figure 5</b> of the Conditions), the Lathrop Development District, or Project site lands outside the Academic Growth Boundary, an independent, qualified biologist approved by the County shall conduct a focused survey for special-status plant species prior to ground disturbance during the late winter/early spring period when most local native plant species are flowering and most easily identified. The survey results shall be provided to the Director prior to issuance of site demolition, grading or building permits. If special status plant surveying during flowering period is not possible, development within sensitive habitat areas shall be avoided unless approved by California Department of Fish and Wildlife (CDFW) and the Director.</p>	Stanford (using biologist approved by County)	Prior to ground disturbance; submit survey results prior to issuance of site demolition, grading or building permits	County of Santa Clara, CDFW	Include in MMRP Report; Complete upon completion of focused special-status plant species survey and County receipt of survey results

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Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-4(b): Avoidance.</b> Construction activities shall avoid impacts to special-status plant species by establishing a buffer zone around the individuals in question. The buffer size shall be determined by an independent, qualified biologist approved by the County in order to avoid potential disturbance. The width of the buffer shall depend on a consideration of site-specific characteristics, including the plant’s ecological requirements (e.g., sunlight, moisture, shade tolerance, soils, physical and chemical characteristics) and adjacent uses (e.g., sprinkler irrigation or shading from buildings or other structures). The buffer zone shall be clearly demarcated using exclusion fencing.</p>	Stanford (using biologist approved by County)	Establish buffer zone prior to construction; avoid during construction	County of Santa Clara	Include in MMRP Report; Complete upon establishing buffer zone and County receipt of survey results
<p><b>Mitigation Measure 7A.3-4(c): Mitigation if avoidance is not feasible.</b> If the Director determines that establishing an avoidance buffer is not feasible, individual plants (including seeds) shall be transplanted to an area with suitable physical and biological conditions on the Project site outside of the Academic Growth Boundary and monitored and adaptively managed for five years. Transplantation may be accomplished by relocating individual plants or through seed collection and dispersal, or a combination of both, to be determined based on the species. Prior to construction within any area containing special-status plant species, Stanford shall submit a mitigation plan to the satisfaction of the Director identifying planting methods, performance standards, and monitoring periods and protocols.</p>	Stanford (using biologist approved by County)	Transplant prior to construction; Monitoring for five years	County of Santa Clara	Include in MMRP Report; Complete upon five years of monitoring and adaptive management
<p><b>Mitigation Measure 7A.3-6(a): Habitat avoidance.</b> Grading or ground-disturbing activities within 150 feet of the top of bank of a creek that supports steelhead shall be avoided. The EIR indicates that the steelhead are present in the San Francisquito Creek system.</p>	Stanford	Avoid during construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction
<p><b>Mitigation Measure 7A.3-6(b): Protective measures.</b> If the determines that avoidance of steelhead habitat is not feasible, Stanford shall obtain any required permits and approvals from federal and state wildlife agencies, as determined by the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, as well as a Streambed Alteration Agreement. Such permits and approvals shall specify the conditions under which construction activities may occur, including any applicable construction windows, installation of coffer dams or other measures necessary to protect steelhead. Permits and approvals from wildlife agencies (or verification from the agencies that permits are not required) shall be submitted to the satisfaction of the Director prior to issuance of any construction permits.</p>	Stanford	Obtain permits and approvals prior to construction	County of Santa Clara, Corps, USFWS, NMFS, CDFW	Include in MMRP Report; Complete upon completion of construction in accordance with permits and approvals
<p><b>Mitigation Measure 7A.3-7(a):</b> Grading or ground-disturbing activities within 150 feet of riparian habitat shall be avoided.</p>	Stanford	During construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction



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<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-7(b):</b> If the Director determines that avoidance is not feasible, Stanford shall obtain all appropriate permits for wetland or other work within the riparian area from the Army Corps of Engineers, US Fish and Wildlife Service, National Oceanic and Atmospheric Administration and California Department of Fish and Wildlife. As specified by agency permits, any riparian habitat areas lost as a result of project development would be replaced through the creation, preservation or restoration of equivalent habitat at an appropriate mitigation ratio or through other measures as approved by the wildlife regulatory agencies listed above.</p>	Stanford	Obtain permits and approvals prior to construction	County of Santa Clara, Corps, USFWS, NMFS, CDFW	Include in MMRP Report; Complete upon completion of construction in accordance with permits and approvals
<p><b>Mitigation Measure 7A.3-8(a):</b> Prior to oak tree removal within the Lathrop Development District, a tree removal plan and arborist report shall be submitted which identifies the species type, acreage, diameter, and amount of canopy of oak trees proposed for removal. The arborist report shall be prepared by an I.S.A. Certified Arborist, Registered Professional Forester, or another professional approved by the County.</p>	Stanford (using I.S.A. Certified Arborist or Registered Professional Forester or County-approved professional)	Prior to oak tree removal; prepare tree removal plan and arborist report	County of Santa Clara	Include in MMRP Report; Complete upon approval of tree removal plan and arborist report by the County
<p><b>Mitigation Measure 7A.3-8(b):</b> If the proposed oak tree removal would result in a decrease of 0.5-acre or more of native oak canopy on the project site, at least two of the following three mitigation measures shall be implemented:</p> <p>1) <i>Planting Replacement of Oak Trees.</i> Pursuant to Public Resources Code Section 21083.4, the planting of oaks shall not fulfill more than 50 percent of the mitigation requirement for the project.</p> <p>Tree replacement can be dependent upon the size of the canopy of the removed trees, the number of trees to be removed, the size of trees to be removed, the type of trees to be removed, the steepness of the slope on which trees will be removed, or the amount of room on a parcel in which trees can be planted. The objective of tree planting shall be to restore former oak woodland at a ratio of 2:1 or 3:1 based on the condition of the oak woodland habitat. 2:1 restoration is recommended for medium quality oak woodland habitat, and 3:1 restoration is recommended for high quality oak woodland habitat.</p> <p>The following standard mitigation ratios shall be used, unless a different higher ratio is applied by the Director based on site-specific characteristics:</p> <ul style="list-style-type: none"> <li>For the removal of one small tree (5-18 inches): two 24-inch boxed trees or three 15 gallon trees.</li> <li>For the removal of 1 medium tree (18-24 inches): three 24-inch boxed trees or four 15 gallon trees.</li> </ul>	Stanford	Prior to oak tree removal	County of Santa Clara	Include in MMRP Report; As specified in the measure

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<b>Biological Resources (cont.)</b>				
<ul style="list-style-type: none"> <li>• For the removal of a tree larger than 24 inches: four 24-inch boxed trees or five 15 gallon trees.</li> </ul> <p>All tree replacement shall be with in-kind species, unless alternate species are approved by the County. A Tree Planting and Maintenance Plan shall be submitted for approval by the Director showing species, size, spacing and location of plantings and the location and species of established vegetation. Tree plantings shall be monitored for five years following planting and a survival rate of 75% will be required. Should the planted trees fail to meet the established performance and survival criteria, Stanford shall be responsible for additional plantings and management activities necessary to ensure the long-term success of planted mitigation trees. Additional tree plantings necessary to achieve the required survival rate shall be subject to a five-year monitoring period from the date of planting.</p> <p>2) <i>Conservation Easement.</i> Protect existing native oak trees on or off the project site from future development through a conservation easement or fee title dedication to the County or a land conservation group approved by the County.</p> <p>Oak woodland offered as mitigation must be configured in such a manner as to best preserve the integrity of the oak ecosystem and minimize the ratio of edge to area. Priority should be given to conserving oak habitat adjacent to existing woodlands under conservation easements, public lands or open space lands. The protection of existing oak woodlands through conservation easements shall mitigate for the loss of oaks at a ratio equal to 2:1 (for medium quality oak woodland habitat) or 3:1 (for high quality oak woodland habitat) as determined by the Director. Land proposed as mitigation, when viewed with adjacent protected conservation land, should not result in conserved parcels of less than one acre.</p> <p>3) <i>Other Options.</i> If the Director determines that there are no feasible sites for oak woodland mitigation on Stanford lands, then Stanford shall submit a plan for review and approval by the Director that provides for the conservation of oak woodlands elsewhere in Santa Clara County in the same manner as 7A.3-8(b)(2).</p> <p>This plan must include protection of an existing oak ecosystem through a conservation easement or fee title dedication to the County or other local agency or organization responsible for the oak woodlands preservation.</p>	Stanford	Prior to oak tree removal	County of Santa Clara	Include in MMRP Report; As specified in the measure

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<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-9(a): Jurisdictional waters and wetland identification.</b> Stanford has provided a wetland delineation that covers the lands within the Academic Growth Boundary. Prior to grading or ground-disturbing activities on lands outside the Academic Growth Boundary, the County shall determine whether the existing wetland delineation is adequate to assess the project’s impacts and, if not, an independent, qualified wetland biologist approved by the County shall delineate jurisdictional waters or wetlands on and within 250 feet of the construction site.</p>	Stanford (using qualified wetland biologist)	Prior to ground disturbance outside Academic Growth Boundary	County of Santa Clara	Include in MMRP Report; Complete upon completion of delineation
<p><b>Mitigation Measure 7A.3-9(b): Jurisdictional waters and wetlands avoidance.</b> For all projects grading or ground-disturbing activities within 250 feet of jurisdictional waters or wetlands shall be avoided unless the Director determines that avoidance is not feasible.</p>	Stanford	During construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction
<p><b>Mitigation Measure 7A.3-9(c): Jurisdictional waters or wetland replacement.</b> If the Director determines that avoidance of jurisdictional waters or wetlands is not feasible, Stanford shall obtain all applicable permits or approval for work in jurisdictional waters (i.e., Waters of the State or Waters of the U.S.), from applicable regulatory agencies, including but not necessarily limited to, the U.S. Army Corps of Engineers, San Francisco Bay Regional Water Quality Control Board, California State Department of Fish and Wildlife and U.S. Fish and Wildlife Service. Any jurisdictional waters or wetlands that are filled as a result of project development shall be replaced through the creation, preservation or restoration of jurisdictional waters or wetlands or through other measures that the agencies deem appropriate through permit requirements to adequately mitigate the impact. Permits and approvals (or verification from the agencies that permits are not required) shall be submitted for approval by the Director prior to the issuance of any construction permits. Potential measures may include the following:</p> <ul style="list-style-type: none"> <li>• For creek projects, remove hardscape features from the stream channel and stream banks.</li> <li>• Stabilize exposed slopes or streambanks immediately upon completion of construction activities.</li> <li>• To restore disturbed aquatic sites, a wetland mitigation and monitoring plan will be prepared that outlines the objectives to mitigate for construction impacts. At a minimum the plan will include thresholds of replanting success (e.g., 90 percent plant survival after one year, 80 percent second year, and 70 percent third year), monitoring requirements (e.g., at least once each year to confirm site stability, plant viability, and to schedule weeding, as needed), and shall specify resource agency reporting requirements.</li> </ul>	Stanford (using qualified wetland biologist)	Prior to, during, and after construction	County of Santa Clara, Corps, RWQCB	Include in MMRP Report; As specified in the measure

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<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-11(a): Tree Preservation and Removal Ordinance.</b> Stanford shall comply with the County’s Tree Preservation and Removal Ordinance (County Ordinance Code, Division C16). A “tree” is defined as a woody plant having a single trunk measuring at least 37.7 inches in circumference (12 inches or more in diameter) measured at 4.5 feet above the ground or immediately below the lowest branch, whichever is lower, or in the case of multi-trunk trees, a trunk size of 75.4 inches in circumference (24 inches in diameter). Any trees in the <i>Community Plan</i> Area, not including the R1S zoning district (see <b>Figure 4</b> of the Conditions), that meet the definition of a tree are required to be maintained by the conditions of approval of the GUP, and therefore are considered protected trees. In addition, the County Ordinance Code defines a protected tree on the Stanford campus as a:</p> <ul style="list-style-type: none"> <li>• heritage tree (if included on the County’s heritage resource inventory adopted by resolution of the Board of Supervisors);</li> <li>• a tree planted or retained as required by conditions of approval of County permits;</li> <li>• and a tree located within County rights-of-way and easements.</li> </ul> <p>Stanford shall not remove a protected tree unless:</p> <ol style="list-style-type: none"> <li>1. Removal of the protected tree is authorized by a County land use approval for which a grading or building permit has been issued.</li> <li>2. Removal of the protected tree is authorized by a County-issued administrative permit or encroachment permit for tree removal; or</li> <li>3. Removal of the protected tree is exempt. In addition to trees removed pursuant to a County land use approval, the ordinance currently exempts removal of a protected tree in the following circumstances: <ul style="list-style-type: none"> <li>• the tree is diseased, dead, or dying or substantially damaged from natural causes;</li> <li>• tree cutting is needed to remove a hazard to life and personal property; and</li> <li>• maintenance work within public utility easements</li> </ul> </li> </ol>	Stanford	Prior to construction	County of Santa Clara	Include in MMRP Report

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Biological Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.3-11(b): <i>Tree Replacement.</i></b> Issuance of a permit or approval from the County that authorizes removal of a protected tree shall be conditioned as follows:</p> <ol style="list-style-type: none"> <li>Protected trees shall be replaced at a ratio of 3:1 for oaks and 1:1 for other protected trees; or</li> <li>Stanford may submit a Vegetation Management Plan for the entire campus to the Director for review and approval. This plan must provide for the same or greater level of tree protection as the measures described in Mitigation Measure 7A.3-11(b)(1).</li> <li>Compliance with the Vegetation Management Plan shall be assessed in the Annual Monitoring Report.</li> </ol>	Stanford	Prior to issuance of land use permit, administrative permit, or encroachment permit	County of Santa Clara	Include in MMRP Report; As specified in the measure
<b>Cultural Resources</b>				
<p><b>Mitigation Measure 7A.4-1(a): <i>Survey Update.</i></b> The Stanford University Historic Resources Survey dated April 2017 contains an evaluation of all buildings and structures located within the Stanford Community Plan's Academic Campus land use designation that were constructed prior to 1976. Prior to 2025, Stanford shall provide for the review and approval by the Director (or designated representative) an additional survey of structures built within the Academic Campus land use designation between 1976 and 1985 ("Survey Addendum"). At its his/her discretion, the Director may require a peer review of the Survey Addendum by a qualified professional (Architect with preservation experience or Architectural Historian) at Stanford's expense.</p>	Stanford	Submit Survey Addendum prior to 2025	County of Santa Clara; qualified professional for peer review	Include in MMRP Report; Complete upon approval of Survey Addendum by the County
<p><b>Mitigation Measure 7A.4-1(b): <i>Demolition.</i></b> For any building project that involves demolition of an historical resource that is listed or has been identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey or Survey Addendum, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared as part of the CEQA environmental review of the project. Consistent with the County's process the analysis of project impacts, alternatives and mitigation will be referred to the Santa Clara County Historical Heritage Commission for its recommendation prior to approval. For any building project that involves demolition of a historical resource that is listed or has been identified as eligible for listing on the National Register of Historic Places or the County's Heritage Resource Inventory, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared by a third party hired by the County as part of the CEQA environmental review of the project.</p>	Stanford	Prior to approval of development project	County of Santa Clara	Include in MMRP Report; Complete upon completion of CEQA review of development project

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance											
<b>Cultural Resources (cont.)</b>															
<p><b>Mitigation Measure 7A.4-1(c): Alteration of a Historical Resource.</b> For any proposed building project that involves remodeling, alteration, or a potential physical effect on an historical resource that is listed or identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey or Survey Addendum, Stanford shall meet the following requirements:</p> <p>1) The proposed building project shall be consistent with the <i>Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings</i> (1995) ("Secretary of Interior's Standards"). Stanford shall submit documentation to the County prepared by a qualified professional to demonstrate consistency of the proposed project with the Secretary of the Interior's Standards. If the work to be performed constitutes basic maintenance, repair or replacement, Stanford shall mark the project plans with text stating: "Exterior work is limited to replacement of deteriorated materials with in-kind materials that match the old. Project plans have been reviewed by [Name of Architect], who has determined the work would comply with the Secretary of Interior's Standards." If the work to be performed is more extensive than basic maintenance repair or replacement in kind, Stanford shall submit a letter along with the project plans explaining the basis for the University Architect's Office determination that the work would comply with the Secretary of the Interior's Standards. The Director will review the marked plans or letter, and may require additional documentation.</p> <p>2) The requirement that the building project must be consistent with the Secretary of the Interior's Standards shall be primarily limited to alterations to the exterior. Building interiors will be exempt from such a consistency requirement, except for interior spaces that are open to the general public on an ongoing basis. Such buildings are listed below along with their public interior spaces.</p>	Stanford	Prior to approval of development project	County of Santa Clara, peer review by qualified professional	Include in MMRP Report; As specified in the measure											
	<table border="1"> <thead> <tr> <th data-bbox="308 1144 569 1234">Historic Resource</th> <th data-bbox="308 1234 569 1344">Primary public space(s) subject to review (if integrity present)</th> <th data-bbox="308 1344 569 1440">Secondary space(s): no review required</th> </tr> </thead> <tbody> <tr> <td data-bbox="308 1234 569 1344">Cantor Center/ Stanford Museum</td> <td data-bbox="308 1344 569 1440">Lobby and galleries on first and second floors of 1891 and 1902 wings</td> <td data-bbox="308 1440 569 1550">Restrooms, staff offices, collection storage areas, all basement areas and all spaces in 1999 addition</td> </tr> <tr> <td data-bbox="569 1234 846 1344">Memorial Church</td> <td data-bbox="569 1344 846 1440">Main sanctuary, entry vestibule, organ and choir lofts</td> <td data-bbox="569 1440 846 1550">Restrooms, offices and store rooms, all basement areas</td> </tr> </tbody> </table>	Historic Resource	Primary public space(s) subject to review (if integrity present)	Secondary space(s): no review required	Cantor Center/ Stanford Museum	Lobby and galleries on first and second floors of 1891 and 1902 wings	Restrooms, staff offices, collection storage areas, all basement areas and all spaces in 1999 addition	Memorial Church	Main sanctuary, entry vestibule, organ and choir lofts	Restrooms, offices and store rooms, all basement areas					
Historic Resource	Primary public space(s) subject to review (if integrity present)	Secondary space(s): no review required													
Cantor Center/ Stanford Museum	Lobby and galleries on first and second floors of 1891 and 1902 wings	Restrooms, staff offices, collection storage areas, all basement areas and all spaces in 1999 addition													
Memorial Church	Main sanctuary, entry vestibule, organ and choir lofts	Restrooms, offices and store rooms, all basement areas													

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures			Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Cultural Resources (cont.)</b>						
<b>Historic Resource</b>	<b>Primary public space(s) subject to review (if integrity present)</b>	<b>Secondary space(s): no review required</b>				
Art Gallery	Vestibule and gallery space	Restrooms, offices and store rooms, all basement areas				
Hoover Tower	Lobby, galleries, observation platform	Restrooms, offices and store rooms, all basement areas				
Memorial Hall	Lobby, Pigott Theater, Auditorium	Restrooms, offices and store rooms, radio station				
Frost Amphitheater	Terraces, stage	Restrooms, store rooms				
Burnham Pavilion/ Ford Center	Lobby, main gym	Restrooms, locker rooms, offices, store rooms; all spaces in 1990 addition				
<p>3) The Director may require a peer review of the Secretary of the Interior’s Standards consistency analysis by a qualified professional (Architect with preservation experience or Architectural Historian) at Stanford’s expense.</p> <p>4) If a building project is not consistent with the Secretary of Interior’s Standards, a project-specific analysis of the impact to historic resources and any feasible alternatives and mitigation measures shall be prepared as part of the CEQA environmental review. The analysis of impacts, alternatives and mitigation measures will be referred to the Santa Clara County Historical Heritage Commission for its advisement prior to a decision by the County.</p>						
<p><b>Mitigation Measure 7A.4-1(d):</b> For any building project that involves demolition, modification or significant alteration of a building or structure located outside of the Academic Campus land use designation that is 50 or more years old, Stanford may elect to follow the Secretary of Interior’s Standards. If Stanford does not elect to follow the Secretary of Interior’s Standards for such a project Stanford shall submit an assessment regarding the building/structure’s potential eligibility for listing on the California Register (“Eligibility Assessment”) to the Director. If the Director determines that the building/structure is eligible for listing on the California Register, then Stanford shall comply with the provisions in Sections 2 and 3 above and the</p>			Stanford	Prior to approval of development project	County of Santa Clara, peer review by qualified professional	Include in MMRP Report; As specified in the measure

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Cultural Resources (cont.)</b>				
<p>building/structure shall be treated as if it were identified as eligible for listing in the Stanford Historic Resources Survey or Survey Addendum for purposes of those Sections. The Director may require a peer review of the Eligibility Assessment by a qualified professional (Architect or Architectural Historian) at Stanford's expense.</p>				
<p><b>Mitigation Measure 7A.4-1(e):</b> Proposed new buildings projects located within 75 feet of an historic resource that are identified as eligible for listing on the California Register in the Stanford University Historic Resources Survey, Survey Addendum or Eligibility Assessment, measured from the nearest exterior walls, shall be reviewed by the University Architect to ensure that the design does not negatively impact the historic resources surrounding it. Stanford shall prepare design guidelines and submit a letter to the Director confirming that the new building construction has been reviewed by the University Architect's Office or other qualified professional and is compatible with any historic resources located within 75 feet of the proposed new building. The Director (or designated representative) will review the letter prior to County approval of the new building. The Director may require a peer review of the University's evaluation prior to approval of the building project.</p>	Stanford	Prior to approval of development project	County of Santa Clara, peer review by a qualified professional	Include in MMRP Report; Complete upon approval of letter by the County
<p><b>Mitigation Measure 7A.4-2(a): <i>Archaeological Resources Map.</i></b> Stanford has provided a map to the Director, maintained as a confidential record, that shows the location of all known prehistoric and historic archaeological resources in the unincorporated Santa Clara County portion of Stanford lands. Stanford shall conduct a Record Search at the Northwest Information Center of the California Historical Resources Information System and submit an updated map each year as part of the 2018 General Use Permit annual monitoring and compliance process. This annual update will be the basis for evaluating potential impacts of future projects that include ground disturbance.</p> <p>At the discretion of the Director, project-related archaeological site assessments and monitoring shall be conducted and mitigation measures identified by either the Stanford University Archaeologist or an independent archaeologist retained by the County at Stanford's expense. All archaeological reports (including, but not limited to, site assessments, monitoring reports, Archaeological Treatment Plans) shall be forwarded to the Director for review at Stanford's expense. All work shall be performed by, or under the supervision of, an archaeologist that meets the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61).</p>	Stanford	Prior to approval of development project	County of Santa Clara, peer review by a qualified archaeologist	Include in MMRP Report; As specified in the measure



**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Cultural Resources (cont.)</b>				
<p>Significant impacts from projects on prehistoric and historic archaeological resources shall be addressed as specified below:</p> <ol style="list-style-type: none"> <li>1. If a building project is proposed on a mapped archaeological site, a qualified archaeologist shall conduct a project-specific analysis to determine whether a significant impact would occur. If there is a potentially significant impact that cannot be avoided, an Archaeological Resources Treatment Plan shall be prepared and approved by the County Planning Office prior to the commencement of ground disturbing activities. If a Stanford archaeologist performs this work, the County may at its discretion require a peer review by an independent qualified archaeologist at Stanford's expense. Project-specific mitigation, if necessary, shall be identified in accordance with the provisions of Section 21083.2 of the Public Resources Code.</li> <li>2. In the event that previously unidentified historic or prehistoric archaeological resources are discovered during construction, the contractor shall cease work in the immediate area and the and University Archaeologist shall be contacted immediately. The University Archaeologist prepare a proposed Archaeological Resources Treatment Plan for approval by the Director. At the discretion of the Director (or designated representative) an independent qualified archaeologist may be retained by the County at the expense of Stanford to assess the significance of the find and the adequacy of the proposed Archaeological Resources Treatment Plan. The Director may require consultation with the Native American Heritage Commission. Stanford shall implement the approved Treatment Plan to the satisfaction of the Director.</li> <li>3. Archaeological monitoring shall be conducted at any time construction-related ground-disturbing activities (greater than 12 inches in depth) are taking place within 100 feet of known archaeological resources. A technical report including the results of all monitoring activities shall be prepared once monitoring is completed in accordance with professional standards and submitted to the University Archaeologist. The archaeological monitoring shall be conducted or supervised by an individual meeting the Secretary of Interior Professional Qualifications Standards in Archaeology (36 CFR 61).</li> </ol>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Cultural Resources (cont.)</b>				
<p><b>Mitigation Measure 7A.4-2(b): <i>Human Skeletal Remains.</i></b> If human skeletal remains are encountered, Stanford is required by Section B6-18 of the County Ordinance Code to immediately notify the County Coroner. Work shall immediately stop within a 100-foot radius of the find. If the County Coroner determines that the remains are Native American, the coroner shall contact the California Native American Heritage Commission, pursuant to Health and Safety Code Section 7050.5(c), and the County Coordinator of Indian affairs. No further disturbance of the site may be made except as authorized by the County Coroner. If artifacts are found in association with the human skeletal remains no further disturbance of the artifacts may be made until authorized by the Director. It is the responsibility of Stanford to provide for reburial of the human skeletal remains and associated artifacts following completion of the required Native American consultation process described by Health and Safety Code section 7050.5 (c) and Public Resources Code Section 5097.98; Stanford shall file a State Record Form (DPR Series) documenting the reburial location with the California Historical Resources Information System and provide the location on the updated map provided for in Section 3 above.</p>	Stanford	Upon discovery, if applicable	County of Santa Clara	Include in MMRP Report; Complete upon notification to County Coroner, and, if applicable, California Native American Heritage Commission
<p><b>Mitigation Measure 7A.4-3: <i>Fossilized Shell or Bone.</i></b> If potentially significant fossilized shell or bone is uncovered during any earth-disturbing operation, contractors shall stop work within 100 feet of the find and notify the University Archaeologist and the County Building Inspector assigned to the project. The University Archaeologist shall visit the site and make recommendations for treatment of the find (including but not limited to consultation with a paleontologist and excavation, if warranted), which shall be sent to the County Building Inspection Office and the Director. If a fossil find is confirmed, it will be recorded with the United States Geological Survey and curated in an appropriate repository.</p>	Stanford	Upon discovery, if applicable	County of Santa Clara	Include in MMRP Report; Complete upon notification to County and recommendations for treatment, and if applicable, United States Geological Survey
<b>Hazards and Hazardous Materials</b>				
<p><b>Mitigation Measure 7A.8-2(a):</b> During construction within the Project site, any contractor shall cease any earthwork activities upon discovery of any suspect soils or groundwater (e.g., petroleum odor and/or discoloration) during construction. The contractor shall notify Stanford and the County of Santa Clara’s Hazardous Materials Compliance Division (HMCD) of the Department of Environmental Health upon discovery of suspect soils or groundwater. Stanford will retain a qualified environmental firm to collect soil samples to confirm the level of contamination that may be present.</p>	Stanford	Upon discovery during construction, if applicable	Stanford’s Department of EH&S; County of Santa Clara HMCD	Include in MMRP Report; Complete upon determining presence of contamination

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Hazards and Hazardous Materials (cont.)</b>				
<p><b>Mitigation Measure 7A.8-2(b):</b> If contamination is found to be present, any further proposed soil- or groundwater-disturbing activities within areas of identified or suspected contamination shall be conducted according to a site specific health and safety plan, prepared by a California state licensed professional. The contractor shall follow all procedural direction given by County HMCD and/or identified in a Soil and Groundwater Management Plan prepared for the site by a qualified environmental firm to ensure that suspect soils are isolated, protected from runoff, and disposed of in accordance with transportation laws and the requirements of the licensed receiving facility.</p>	Stanford	Upon discovery during construction, if applicable	Stanford's Department of EH&S; County of Santa Clara HMCD	Include in MMRP Report; Complete upon disposal in accordance with County HMCD direction and/or Soil and Groundwater Management Plan
<p><b>Mitigation Measure 7A.8-2(c):</b> If contaminated soil or groundwater is encountered and identified constituents exceed human health risk levels, it shall be delineated, removed, and disposed of offsite in compliance with the overseeing agency, either County HMCD or Regional Water Quality Control Board ("RWQCB"), as well as the receiving facilities' requirements.</p>	Stanford	Upon discovery, if applicable	County of Santa Clara HMCD or RWQCB	Include in MMRP Report; Complete upon proper disposal
<b>Hydrology and Water Quality</b>				
<p><b>Mitigation Measure 7A.9-1: <i>Water Wells.</i></b> Prior to issuance of a demolition permit, building permit, or grading permit, Stanford shall review its historic wells survey and confirm that no historic wells, not properly closed, are located within at the project and determine the potential for encountering any groundwater wells within the area of proposed improvements. If a well is discovered, and it is no longer part of operations and was not abandoned in accordance with SCVWD requirements, Stanford shall fulfill the well abandonment/destruction permit requirements. Stanford shall contact SCVWD to locate existing inactive wells and confirm adherence to the well abandonment/ destruction requirements. Stanford shall provide documentation to the satisfaction of the Director that there is no record of inactive/historic wells at the project location, or provide documentation that all wells on the site have been closed in conformance with a Well Destruction Permit issued by the SCVWD.</p>	Stanford	Prior to issuance of demolition or building permit	SCVWD	Include in MMRP Report; Complete upon well abandonment/destruction and SCVWD receipt of supporting documentation
<p><b>Mitigation Measure 7A.9-4: <i>Groundwater Recharge.</i></b> All future development projects shall achieve net positive ground water recharge. Stanford shall review individual building projects proposed under this General Use Permit for changes in impervious surface area within the Unconfined Groundwater Zone shown on <b>Figure 7</b> of the Conditions, and submit to the County for approval by the Director, an assessment of the proposed project's projected net effect on groundwater recharge. Actual recharge shall be tracked on a cumulative basis to verify that all development authorized pursuant to this GUP will continue to result in an annual net positive recharge in the Unconfined Groundwater Zone. Record of monitored data shall be submitted to the County on an annual basis and Santa Clara Valley Water District ("SCVWD") and include both water</p>	Stanford	Annually	County of Santa Clara	Include in MMRP Report; Ongoing

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

<b>Mitigation Measures</b>	<b>Mitigation Responsibility</b>	<b>Mitigation Schedule</b>	<b>Monitoring and Reporting Program Responsibility</b>	<b>Monitoring Actions/Schedule and Verification of Compliance</b>
volumes and water quality data. Such information shall be recorded in the Annual Report.				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Noise and Vibration</b>				
<p><b>Mitigation Measure 7A.11-1: Construction Noise Control Measures and Noise Control Plan for Off-Site Receptors.</b> If construction would be within 150 feet of off-site sensitive receptors, Stanford shall employ noise attenuation measures to reduce the generation of construction noise to achieve a performance standard of 75 dBA at the affected property line of the nearest off-site single family residential receptor and 80 dBA at the affected property line of the nearest off-site multi-family residential receptor. These measures shall be described in a Noise Control Plan that shall be submitted for review and approval by the Director prior to issuance of a building permit to ensure that construction noise is consistent with the standards set forth in the County Ordinance Code.</p> <p>Additional measures specified in the Noise Control Plan and implemented during project construction shall include, at a minimum, the following noise control strategies:</p> <ul style="list-style-type: none"> <li>For construction on a Project site that would be within 150 feet of sensitive receptors located within the City of Palo Alto, hours of construction activity shall be restricted to those established in the City of Palo Alto Noise Ordinance (i.e., between the hours of 8:00 AM to 6:00 PM Monday through Friday, and between 9:00 AM and 6:00 PM on Saturday).</li> </ul> <p>For construction on a Project site that would be within 150 feet of sensitive receptors located within all other residential areas, hours of construction activity shall be restricted to those established in the Santa Clara County Noise Ordinance (i.e., between seven a.m. and seven p.m., Monday through Saturday).</p> <ul style="list-style-type: none"> <li>Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels to below 75 dBA;</li> <li>Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to approximately 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and</li> </ul>	Stanford	Submit Noise Control Plan prior to issuance of building permit for development project; Implement during construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction of development project

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Noise and Vibration (cont.)</b>				
<ul style="list-style-type: none"> <li>Stationary construction noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.</li> </ul> <p>Emission of sound in the performance of emergency work is exempt from these requirements. In addition, variances to these restrictions may be allowed, with County approval, for certain utility work or other construction for which nighttime work would avoid secondary impacts (e.g., traffic impacts during commute periods); and where compliance with the noise thresholds is technically or economically infeasible. A variance may be granted only where the activity will not create a nuisance and will not be detrimental to the public health and safety.</p>				
<p><b>Mitigation Measure 7A.11-2: Construction Noise Control Measures and Noise Control Plan for On-Site Receptors.</b> For construction activities over two weeks in duration, and within 150 feet of on-site sensitive receptors, Stanford shall identify noise attenuation measures to reduce the generation of construction noise to achieve a minimum performance standard of 80 dBA, Leq over an 8-hour period at the nearest on-site residential or day care land use. These measures shall be described in a Noise Control Plan that shall be submitted for review and approval by the Director prior to issuance of a building permit to ensure that construction noise is consistent with the standards.</p> <p>If necessary to achieve the minimum performance standard stated above, measures specified in the Noise Control Plan and implemented during project construction shall include, at a minimum, the following noise control strategies:</p> <ul style="list-style-type: none"> <li>Equipment and trucks used for construction shall use the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels to below 80 dBA;</li> <li>Impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used; this muffler can lower noise levels from the exhaust by up to approximately 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of 5 dBA. Quieter procedures, such as use of drills rather than impact tools, shall be used where feasible; and</li> </ul>	Stanford	Prior to issuance of building permit for development project; Implement during construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction of development project

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Noise and Vibration (cont.)</b>				
<ul style="list-style-type: none"> <li>Stationary construction noise sources shall be located as far from adjacent receptors as possible, and they shall be muffled and enclosed within temporary sheds, incorporate insulation barriers, or include other measures.</li> </ul>				
<p><b>Mitigation Measure 7A.11-3: Construction Vibration Reduction Plan.</b> <i>Construction Vibration Reduction Plan.</i> If construction involving vibratory rollers, hoe rams, or large bulldozers is proposed within 40 feet of an historic structure, Stanford shall develop a Vibration Reduction Plan in coordination with an acoustical consultant, geotechnical engineer, and/or construction contractor, for review and approval by the Director. Measures and controls shall be identified based on project-specific final design plans, and may include, but are not limited to the following:</p> <ol style="list-style-type: none"> <li>1. Use of non-vibratory excavator-mounted compaction wheels and small smooth drum rollers for final compaction of asphalt base and asphalt concrete. If needed to meet compaction requirements, smaller vibratory rollers may be used to minimize vibration levels during repaving activities where needed to meet vibration standards.</li> <li>2. Implementation of buffers and the use of specific types of equipment to minimize vibration impacts during construction at nearby receptors in order to meet a performance standard of 0.12 inches per second PPV (peak particle velocity) at historic buildings and 0.3 inches per second PPV at non-historic buildings.</li> <li>3. Implementation of a vibration, crack, and line and grade monitoring program for identified historic buildings located within 40 feet of construction activities, in coordination with a geotechnical engineer and qualified architectural historian.</li> </ol>	Stanford	Submit Vibration Reduction Plan prior to issuance of building permit for development project; Implement during construction	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction of development project
<p><b>Mitigation Measure 7A.11-4: Shield or Enclose HVAC Equipment and Emergency Generators.</b> Noise levels from mechanical equipment within 150 feet of sensitive receptors shall be minimized by proper siting and selection of such equipment and through installation of sufficient acoustical shielding or noise emission controls. An acoustical analysis shall be prepared by a qualified professional to ensure that any new mechanical equipment achieves the following noise standards at the property line of an offsite sensitive land uses in Palo Alto or Menlo Park, or at the nearest on-site residential, day care or instructional classroom land use:</p> <ul style="list-style-type: none"> <li>The project shall not cause the average 24-hour noise level (Ldn) to increase by 5.0 dB or more in an existing residential area, even if the Ldn would remain below 60 dB;</li> </ul>	Stanford	Submit acoustical analysis prior to issuance of building permit of development project	County of Santa Clara	Include in MMRP Report; Complete upon completion of construction of development project

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Noise and Vibration (cont.)</b>				
<ul style="list-style-type: none"> <li>The project shall not cause the Ldn to increase by 3.0 dB or more in an existing residential area, thereby causing the Ldn in the area to exceed 60 dB;</li> <li>The project shall not cause an increase of 3.0 dB or more in an existing residential area where the Ldn currently exceeds 60 dB.</li> </ul> <p>Noise levels from the periodic testing of emergency generators within 150 feet of sensitive receptors in the cities of Palo Alto or Menlo Park also shall be minimized by proper siting and through installation of acoustical shielding. Scheduled testing of an emergency generator must not occur before 7:00 AM or after 7:00 PM.</p>				
<b>Recreation</b>				
<p><b>Mitigation Measure 7A.14-1(a).</b> Prior to occupancy of net new on-campus housing units exceeding 4,425, Stanford shall provide to the City of Palo Alto a one-time contribution equivalent to the capital budget needs to provide for one-time turf replacement at Heritage Park. The amount of the contribution shall be determined by the County of Santa Clara based on an estimate from an independent contractor. The payment shall not be used for any purpose other than turf replacement at Heritage Park.</p> <p>Prior to occupancy of net new on-campus housing units exceeding 3,150, Stanford shall provide to the City of Palo Alto a one-time contribution equivalent to the capital budget needs to provide for one-time turf replacement at neighborhood parks in College Terrace (Cameron, Mayfield, Weisshaar, and Werry Parks). The amount of the contribution shall be determined by the County of Santa Clara based on an estimate from an independent contractor. The payment shall not be used for any purpose other than turf replacement at College Terrace parks.</p> <p><b>Mitigation Measure 7A.14-1(b).</b> Prior to occupancy of net new on-campus housing units exceeding 4,425, Stanford shall provide to the City of Menlo Park a one-time contribution equivalent to the capital budget needs to provide for one-time turf replacement at Stanford Hills Park. The amount of the contribution shall be determined by the County of Santa Clara based on an estimate from an independent contractor. The payment shall not be used for any purpose other than turf replacement at Stanford Hills Park.</p>	Stanford	Prior to occupancy	County of Santa Clara	Include in MMRP Report
<b>Transportation and Traffic</b>				



**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<p><b>Mitigation Measure 7A.15-1: Construction Traffic Control Measures.</b> The following traffic control measures are required to address impacts from construction of individual General Use Permit projects. All of these items shall be included under Condition G.</p> <ul style="list-style-type: none"> <li> <p><b>Protection and Maintenance of Public Transit Access and Routes.</b> Stanford and its contractors shall be prohibited from limiting access to public transit, and from limiting movement of public transit vehicles, during project construction without prior approval from the VTA (Santa Clara Valley Transportation Authority) and other affected jurisdictions. Such approvals shall require submittal and advance coordination per VTA’s Bus Stop Relocation Policy of a mitigation plan to reduce transit impacts to a less than significant level. Potential actions that would impact access to transit include, but are not limited to, relocating or removing public transit bus stops, limiting access to public transit bus stops or transfer facilities, or otherwise restricting or constraining public transit operations.</p> </li> <li> <p><b>Maintenance of Pedestrian Access.</b> Stanford and its contractors shall be prohibited from substantially limiting pedestrian access to properties or facilities during construction of the project, without prior approval from the affected jurisdictions. Such approvals shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting pedestrian access include, but are not limited to, sidewalk closures, bridge closures, crosswalk closures, pedestrian re-routing at intersections, placement of construction-related material within pedestrian pathways or sidewalks, and other actions which may affect the mobility or safety of pedestrians. If sidewalks are maintained along the construction site frontage, covered walkways shall be provided if determined by the County to be needed for pedestrian safety.</p> </li> <li> <p><b>Maintenance of Bicycle Access.</b> Stanford and its contractors shall be prohibited from substantially limiting bicycle access to properties or facilities during construction of the project, without prior approval from those jurisdictions. Such approval shall require submittal and approval of specific construction management plans to mitigate the specific impacts to a less than significant level. Actions substantially limiting bicycle access include, but are not limited to, bike lane closures or narrowing, closing or narrowing of streets that are designated bike routes, bridge closures, placement of construction-related materials within designated bike lanes or along bike routes, and other actions that may affect the mobility or safety of bicyclists.</p> </li> <li> <p><b>Protection and Maintenance of Emergency Service Access and Routes.</b> Stanford shall inform the Stanford Police and Palo Alto Police and Fire Departments of construction locations, and shall designate alternate evacuation and emergency routes to maintain response times during construction periods.</p> </li> </ul>	<p>Stanford</p>	<p>During construction of development project</p>	<p>County of Santa Clara</p>	<p>Include in MMRP Report; Complete upon completion of construction of development project and as specified in the measure</p>

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<ul style="list-style-type: none"> <li>• <b>Parking for Construction-Related Vehicles.</b> Stanford shall provide adequate on-campus parking for all construction-related vehicles throughout the construction period. If adequate parking cannot be provided on the Stanford campus, a satellite parking area shall be designated, and a shuttle bus shall be operated to transfer construction workers to/from the job site.</li> <li>• <b>Restriction on Construction Delivery Hours.</b> Stanford shall make feasible attempts to avoid construction material deliveries from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM on weekdays. When feasible, Stanford shall be required to prohibit or limit the number of construction employees arriving or departing the site between 4:30 PM and 6:00 PM.</li> <li>• <b>Construction Truck Routes.</b> Stanford shall deliver and remove all construction-related equipment and materials on truck routes designated by the Cities of Palo Alto and Menlo Park and, in the event the County of San Mateo designates truck routes, by the County of San Mateo. Heavy construction vehicles shall be prohibited from accessing the site from routes that the Cities of Palo Alto, Menlo Park or County of San Mateo have prohibited for use by such vehicles. Stanford shall provide written notification to all contractors regarding appropriate routes to and from construction sites and the weight and speed limits for local roads used to access construction sites. A copy of all such written notifications shall be submitted to the Director.</li> <li>• <b>Phone Number for Complaints.</b> Stanford shall post at least one sign no smaller than 1,296 square inches (e.g. 3 ft. x 3 ft.) at all active construction sites. The sign shall contain the name, telephone number and e-mail address of the appropriate Stanford person the public may contact to report alleged violations of this mitigation measure or to register complaints about construction traffic associated with building projects under the General Use Permit. Stanford shall keep a written record of all such complaints and shall provide copies of these records to the Director as part of the annual report process.</li> <li>• <b>Construction Impact Mitigation Plan.</b> In lieu of the above mitigation measures, Stanford may submit a detailed construction impact mitigation plan to the County for review and approval prior to commencing any construction activities with potential transportation impacts. This plan shall address in detail the activities to be carried out in each construction phase, the potential transportation impacts of each activity, and an acceptable method of reducing or eliminating significant transportation impacts. If Stanford determines that it is not feasible to comply with the</li> </ul>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>“Restriction on Construction Delivery Hours” above, then the plan shall also explain the basis for this infeasibility determination. Details such as the routing and scheduling of materials deliveries, construction employee arrival and departure schedules, employee parking locations, and emergency vehicle access shall be described and approved.</p> <ul style="list-style-type: none"> <li>• <b>Construction During Special Events.</b> Stanford shall prevent roadway construction activities from reducing roadway capacity during major athletic events or other special events that attract a substantial number of visitors to the campus.</li> </ul>				
<p><b>Mitigation Measure 7A.15-2:</b></p> <p>1. Terms Defined. For purposes of these conditions of approval, the meaning of key terms and phrases is as follows:</p> <p>A. “AM peak hour” means the four consecutive 15-minute time segments in the morning (AM) with the highest measured volume of traffic in the commute direction (for example 7:30 to 8:30 AM).</p> <p>B. “AM peak period” means the twelve consecutive 15-minute time segments (3 hours) in the morning (AM) with the highest measured volume of traffic measured at the campus cordon in the commute direction (for example; 7:15 to 10:15 AM).</p> <p>C. “Average annual traffic counts” means the number of motor vehicle trips measured at gateways along the cordon area during the 24-hour annual traffic monitoring, divided by the number of days in the measurement period. This definition may also apply to peak hour trips, peak period trips, and/or average daily trips depending on the context.</p> <p>D. “Average daily trips” (ADT) means the number of motor vehicle trips in both directions, measured on a 24-hour basis at the cordon, divided by the number of days in the measurement period.</p>	Stanford	Ongoing	County of Santa Clara	Include in MMRP Report; Ongoing

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>E. “Average daily trip baseline” or “ADT baseline” means the total number of average daily motor vehicle trips as established by the County based on a methodology substantially similar to that used to establish the peak hour commute trip baseline in 2001 (except without the application of a “confidence interval”) based on average annual traffic counts from an average of the 4<sup>th</sup> and 5<sup>th</sup> monitoring years after this GUP is adopted, as approved by the Director. The baseline will be established by the County before authorization of any Phase 2 development.</p> <p>F. “Average daily trip trigger” or “ADT trigger” means the average number of motor vehicle trips above the baseline that will cause Stanford to be in violation of its no net new trips requirement. The trigger number shall be 3% above the ADT baseline.</p> <p>G. “Cordon area” or “cordon” means the area defined by the campus entry and exit points shown in <b>Figure 2</b> in the Conditions.</p> <p>H. “Commuter trips” or “commute direction” means total motor vehicle trips entering the Stanford campus in the morning (AM) and leaving the cordon area in the afternoon/evening (PM) as measured pursuant to <b>Condition F</b>.</p> <p>I. “Cut-through trips” means vehicles that enter and exit the cordon area without any person or item entering or exiting the vehicle while the vehicle is within the cordon area. Examples of trips that are not cut-through trips include Transportation Network Company (TNC) trips, colloquially known as “rideshare” trips (e.g., Uber, Lyft) that pick up or drop off passengers within the cordon area, and delivery trucks that pick up or drop off packages within the cordon area.</p> <p>J. “No net new commute trips” or “NNNCT” means no increase in commute trips as measured against the peak hour commute trip baseline and adjusted by the “confidence interval” in 2001 and the designated exceedance amount or “trigger” (all years).</p> <p>K. “Peak hour commute trip baseline” or “NNNCT baseline” means 3,439 motor vehicle trips in the AM peak hour and 3,555 motor vehicle trips in the PM peak hour, as established through the 2001 adjusted trip counts. These trip baselines include the 90% confidence interval as used when the 2001 baseline was established.</p> <p>L. “Peak hour commute trip trigger” means the average number of motor vehicle trips above the baseline which causes a violation of the no net new trips requirement. For the peak hour requirement, the trigger is 1% or an average of 35 motor vehicle trips per peak hour above the baseline in the AM and 36 motor vehicle trips in the PM.</p>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>M. “Peak hour reverse commute trip baseline” means the number of reverse commute motor vehicle trips during the AM peak hour and PM peak hour based on a methodology substantially similar to that used to establish the peak hour commute trip baseline in 2001 (except without the application of a “confidence interval”) based on average annual traffic counts from the average of the 4<sup>th</sup> and 5<sup>th</sup> year monitoring years after this GUP is adopted, as approved by the Director. The baseline will be established by the County before authorization of any Phase 2 development.</p> <p>N. “Peak hour reverse commute trip trigger” means the average number of motor vehicle trips above the baseline that will cause Stanford to be in violation of the no net new trips requirement. The trigger amount shall be 2% above the peak hour reverse commute trip baseline.</p> <p>O. “Peak period commute trip baseline” means the number of commute trips during the AM peak period and PM peak period as established by the County based on a methodology substantially similar to that used to establish the peak hour commute trip baseline in 2001 (except without the application of a confidence interval) based on the 2001 data that was used to establish the peak hour commute trip baseline, as approved by the Director. The initial baseline will be established by the County before authorization of any Phase 1 development.</p> <p>P. “Peak period commute trip trigger” means the average number of motor vehicle trips above the baseline that will cause Stanford to be in violation of its no net new trips requirement. The trigger amount shall be 1% above the peak period commute direction trip baseline.</p> <p>Q. “Peak period reverse commute trip baseline” means the number of reverse commute motor vehicle trips during the AM peak period and PM peak period as established by the County based on a methodology substantially similar to that used to establish the peak hour commute trip baseline in 2001 (except without the application of a confidence interval) based on average annual traffic counts from the 4<sup>th</sup> and 5<sup>th</sup> year monitoring years after this GUP is adopted, as approved by the Director. The baseline will be established by the County before authorization of any Phase 2 development.</p> <p>R. “Peak period reverse commute trip trigger” means the average number of motor vehicle trips above the baseline which will cause Stanford to be in violation of its no net new trips requirement. The trigger number shall be 2% above the peak period reverse commute trip baseline.</p>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>S. “PM peak hour” means the four consecutive 15-minute time segments in the afternoon/evening (PM) with the highest measured volume of traffic in the commute direction (for example; 4:45 to 5:45 PM).</p> <p>T. “PM peak period” means the twelve consecutive 15-minute time segments (3 hours) in the afternoon/evening (PM) with the highest measured volume of traffic in the commute direction (for example; 4:00 to 7:00 PM).</p> <p>U. “Reverse commute trips” or “reverse commute direction” means total motor vehicle trips leaving the cordon area in the morning (AM) and entering the cordon area in the afternoon/evening (PM).</p> <p>V. “Trip credits” means credits for trips shifted to bicycle, foot, or public transit within the trip credit area through Stanford’s direct efforts or participation in joint transportation demand management efforts that result in verifiable motor vehicle trip reductions that are not already incorporated in the applicable baseline that may be applied to the trip counts at the cordon area to achieve the commute or reverse commute trip standards. Trip credits may not be used to achieve the ADT standards. All trip credits must be verified and approved by the Director pursuant to <b>Condition F.4</b>.</p> <p>W. “Trip credit area” means the traffic impact area immediately outside the cordon as shown in <b>Figure 3</b> in the Conditions. [Note: The trip credit area identified in the 2000 GUP has been expanded to reflect the traffic impact area as identified in the Stanford University 2018 General Use Permit Draft EIR.] Transportation demand management efforts or physical improvements are considered to be within the trip credit area if at least one trip end is located within the trip credit area and the trip does not begin or end inside the cordon. The Director may modify the boundaries of the trip credit area so long as the basic principles upon which trip credits are based are still met.</p> <p>X. “Motor <b>vehicle</b>” (a) A “motor <b>vehicle</b>” is a <b>vehicle</b> that is self-propelled. (b) “Motor <b>vehicle</b>” does not include a self-propelled wheelchair, motorized tricycle, or motorized quadricycle, if operated by a person who, by reason of physical disability, is otherwise unable to move about as a pedestrians defined in California Vehicle Code section 415. While not stated in the vehicle code, electric scooters also do not qualify as a “motor vehicle”.</p>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>2. <b>Traffic Standards.</b> A violation of any of the following traffic standards constitutes a violation of the Conditions of Approval.</p> <p>a. <b>Standards for Commute Trips.</b></p> <p>1) <b>Peak Hour NNNCT Standard.</b> As proposed by Stanford in its 2018 GUP Application, Stanford shall implement a No Net New Commute Trips program to achieve no net increase in commute trips in the AM peak hour or the PM peak hour. A violation of this standard occurs if the average annual traffic counts for peak hour commute trips exceed the NNNCT baseline (3,439 AM trips; 3,555 PM trips) by 1% (35 AM trips; 36 PM trips) or greater during any year.</p> <p>2) <b>Peak Period.</b> There shall be no net increase in commute trips in the AM peak period or the PM peak period. A violation of this standard occurs if the average annual traffic counts for peak period commute trips exceed the peak period commute trip baseline by 1% or greater during any year.</p> <p>3) <b>Consequences of Violations.</b></p> <p>a. If either of the commute trip peak hour or peak period standards are violated in any one (1) year, the County shall immediately suspend approval of any new development projects pursuant to the process in <b>Condition A.11</b> until Stanford demonstrates compliance with the standard(s) through subsequent annual traffic counts, at a minimum, of one (1) year preceding authorization of the next development phase through subsequent annual traffic counts.</p> <p>b. If either of the commute trip peak hour or peak period standards are violated in two (2) or more years during a single academic development phase (see <b>Condition B.2</b>), no subsequent academic development phase shall be authorized until Stanford demonstrates compliance with the standard(s) for, at a minimum, one (1) year preceding authorization of the next development phase through subsequent annual traffic counts.</p>				
<b>Transportation and Traffic (cont.)</b>				
<p>b. <b>Standards for Reverse Commute Trips.</b></p> <p>1) <b>Reverse Commute Trips Peak Hour.</b></p>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

<b>Mitigation Measures</b>	<b>Mitigation Responsibility</b>	<b>Mitigation Schedule</b>	<b>Monitoring and Reporting Program Responsibility</b>	<b>Monitoring Actions/Schedule and Verification of Compliance</b>
<p>a. Stanford shall implement all feasible measures to achieve no net increase in reverse commute trips in the AM peak hour or the PM peak hour.</p> <p>b. Upon authorization of any Phase 2 development and thereafter, there shall be no net increase in reverse commute trips in the AM peak hour or the PM peak hour. A violation of this standard occurs if the average annual traffic counts for peak hour reverse commute trips exceed the reverse commute hour commute trip baseline by 2% in any two (2) consecutive years after this standard takes effect.</p> <p>2) <b><u>Reverse Commute Trips Peak Period.</u></b></p> <p>a. Stanford shall implement all feasible measures to achieve no net increase in reverse commute trips in the AM peak period or the PM peak period.</p> <p>b. Upon authorization of any Phase 2 development and thereafter, there shall be no net increase in reverse commute trips in the AM peak period or the PM peak period. A violation of this standard occurs if the average annual traffic counts for peak period reverse commute trips exceed the peak period reverse commute trip baseline by 2% or greater in any two (2) consecutive years after this standard takes effect.</p> <p>3) <b><u>Consequences of Violations.</u></b></p> <p>a. If any of the reverse commute trip peak hour or peak period standards that commence upon authorization of any Phase 2 or Phase 3 development are violated in any one (1) year, the County shall immediately suspend approval of any new development projects pursuant to the process in <b>Condition A.11</b> until Stanford demonstrates compliance with the standard(s) for, at a minimum, one (1) year preceding authorization of the next academic development phase through subsequent annual traffic counts.</p>				



**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>b. If any of the reverse commute trip peak hour or peak period standards are violated in two (2) or more years during Phase 2 or Phase 3 (see <b>Condition B.2</b>), the next academic development phase shall not be authorized until Stanford demonstrates compliance with the standard(s) for, at a minimum, one (1) year preceding authorization of the next academic development phase through subsequent annual traffic counts.</p> <p>c. <b>Standards for Average Daily Trips (“ADT”).</b></p> <p>1) Stanford shall implement all feasible measures to achieve no net increase in ADT.</p> <p>2) Upon authorization of any Phase 2 development and thereafter, there shall be no net increase in ADT. A violation of this standard occurs if the average annual traffic counts for ADT exceed the ADT baseline by 3% or greater in any two (2) consecutive years during a particular academic development phase after this standard takes effect.</p> <p>3) Consequences of Violations.</p> <p>a. If the ADT standard that commences upon authorization of Phase 2 or Phase 3 development is violated, the County shall not authorize the next academic development phase (see <b>Condition B.2</b>) until Stanford demonstrates compliance with the standard for one (1) year preceding authorization of the next academic development phase through subsequent annual traffic counts.</p> <p>3. <b>Methodology for Average Annual Traffic Counts.</b> Annual traffic counts and determination of traffic volumes shall be conducted by the County or a consultant under contract to the County, and shall comply with the following methodology, unless modifications are approved by the Director.</p> <p>a. <b>Counts.</b> In addition to any traffic count system that may be authorized by the Director, annual traffic monitoring shall be conducted through tube, manual, or another methodology conducted at least two times during the year for a continuous period of at least two (2) weeks each, totaling at least eight (8) weeks. All counts shall be conducted during the regular academic year during</p>	Stanford	Ongoing	County of Santa Clara	Include in MMRP Annual Report; Ongoing

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>times that do not include academic breaks, end-of-quarter finals, or other events that may cause irregular traffic patterns (e.g., Homecoming). Specific dates for each count shall be determined by the Director. The counts shall be averaged to determine the average traffic levels for each year for each performance measure under this condition (peak hours and peak periods in commute and reverse commute directions, and ADT).</p> <p>1) <b>Count Methodology.</b> During monitoring periods, the total amount of traffic crossing the cordon line will be counted by travel direction. The cordon count monitoring will be conducted on a 24-hour basis.</p> <p>2) <b>Cordon Gateways.</b> All counts shall be taken at the campus entry and exit points shown in <b>Figure 2</b> in the Conditions (<b>Figure 5.15-2</b> of the EIR), which encompass the cordon area. Additional cordon gateways may be added, and the location of the cordon line may be modified by the Director.</p> <p>a. <b>Cordon Count Adjustments.</b> Traffic counts at the cordon will be adjusted to account for cut-through trips and use of parking lots within the cordon area by hospital-related traffic and use of lots or other parking areas outside the cordon area by campus-related traffic. The Director reserves the right to change the methodology for these adjustments to ensure that the cordon counts accurately reflect traffic related to development and other activities within the Stanford Community Plan area.</p> <p>i. <b>Cordon Count Adjustment Methodology.</b> Hospital trips will be subtracted from the cordon count and campus trips will be added to the cordon count. The count adjustment will also factor in the potential for hospital trips to park in the campus lots and campus trips to park in the hospital lots. At the beginning and end of the peak hours and peak periods, data will need to be collected from each lot. If campus parking occurs in lots outside the cordon, trips associated with those vehicles will be added back into the count. If hospital parking occurs inside the cordon, trips associated with those vehicles will be subtracted from the count. All vehicles without a parking permit will be assumed to be correctly parked in their respective lots, unless the County approves an alternate protocol for assigning such parking.</p>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>ii. <u>Cut-Through Trip Adjustment Methodology</u>. The traffic counts shall include a methodology approved by the Director to adjust the cordon counts for the number of cut-through trips as defined in <b>Condition F.1</b>.</p> <p>b. <u>Peak Hour and Peak Period Identification</u>. The AM and PM peak hour and peak period traffic volumes for each year will be determined based on the 24-hour cordon counts, as adjusted for cut-through traffic and hospital and off-campus parking as described above.</p> <p>i. <u>Total Gateway Counts</u>. Total traffic entering and exiting the cordon area will be summed. AM peak hour, AM peak period, PM peak hour, and PM peak period will be determined for the entire campus based on the inbound traffic counts in the AM and the outbound traffic counts in the PM. The number of cut-through trips calculated by the license plate matching methodology described above (or other methodology approved by the Director) will be removed from both the inbound and the outbound traffic. Finally, any trips associated with campus-related vehicles parking outside the cordon will be added back into the count, and any trips associated with hospital parking that occurs inside the cordon will be subtracted from the counts.</p> <p>b. <u>Automated Continuous Traffic Monitoring</u>. The Director may approve the use of an automated traffic monitoring methodology for purposes of determining the average annual traffic counts if the methodology would be at least as accurate as the traffic count methodology used under the 2000 GUP (e.g., as verified by cross-checking with tube or manual counts).</p> <p>4. <u>Trip credits</u>. Stanford may receive trip credits for off-campus transportation demand management efforts and credit those shifted trips toward attainment of the NNNCT and/or reverse commute trip standards. These trip-reduction efforts may include funding of off-campus circulation infrastructure improvements that will shift travelers from motor vehicle trips to pedestrians, bicycle or transit use. The following requirements apply to trip credits:</p>	<p>County of Santa Clara; Stanford University</p>	<p>Ongoing annual report</p>	<p>County of Santa Clara</p>	<p>Include in MMRP Annual Report; Ongoing annual basis</p>

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>a. Stanford shall only receive credit commensurate with the actual number of trips reduced or shifted from motor vehicle trips to pedestrian, bicycle or transit use outside the cordon due to Stanford's direct efforts or the proportion of the cost of the program to which Stanford is contributing. A reduction of an off-campus trip may only be recognized if at least one terminus for the trip is within the area shown on <b>Figure 3</b> in the Conditions (<b>Figure 7A.15-1</b> in the EIR), and the trip does not begin or end within the cordon.</p> <p>b. The duration of trip credits for any particular transportation demand management effort shall be limited to the period of time during which that effort can reasonably be expected to continue to result in transportation behavior changes within the area shown on <b>Figure 3</b> in the Conditions (<b>Figure 7A.15-1 in the EIR</b>) (and the trips do not begin or end within the cordon).</p> <p>c. Any funding provided by Stanford to mitigate traffic impacts on off-campus roadways or intersections pursuant to Mitigation Measure 5.15-2(a)(6) shall not be eligible for trip credits.</p> <p>d. Stanford shall propose any trip credit programs to the Director for review, modification and potential approval. The proposals shall be presented to the Community Resource Group prior to any determination by the Director. The Director will determine the appropriate trip credit and monitoring methodology for each program in which Stanford participates, including but not limited to how the credits will be allocated among the AM and PM peak hours and peak periods and the duration of the trip credits. Once the Director has accepted the proposal and implementation begins, the County will tabulate and verify, at Stanford's expense, the number of trips that have been shifted within the area shown on <b>Figure 3</b> in the Conditions (<b>Figure 7A.15-1 in the EIR</b>), and the number of trip credits that are available for application toward attainment of the NNNCT and/or reverse commute trip standards.</p> <p>e. Stanford may use trip credits retroactively only under the following circumstances. If Stanford violates any of the traffic standards in these conditions of approval, it may apply trip credits approved in the year immediately following the violation to the trip counts at the cordon area in the prior year to achieve the applicable standards. However, any trip credits used retroactively shall only reduce the prior year's trip counts by 50% (e.g., ten trip credits used retroactively will only reduce the prior year's trip count by 5 trips).</p>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>5. <b>Peak Hour Fair Share Contribution Trigger.</b> If the annual traffic counts for commute trips or reverse commute trips during the AM and PM peak hours, as measured in accordance with the methodology set forth in <b>Condition F.3</b>, and after applying any approved trip credits pursuant to <b>Condition F.4</b>, exceed the baseline volume by 1% or more in any single year, Stanford shall make fair share payments to mitigate its impacts to off-campus roadways and intersections. <b>Table 5</b> in the Conditions (<b>Table 1A</b> of the EIR) identifies the roadway and intersection impacts that could occur if such exceedances occur, and the physical improvements that would substantially reduce each impact.</p> <p>a. <b>Use of Fair Share Contribution.</b> The Director will use the intersection improvement fees collected from Stanford as follows:</p> <ol style="list-style-type: none"> <li>1) <b>Intersection Improvements.</b> The fees shall be used to fund the intersection improvements identified in <b>Table 5</b> in <b>Appendix B</b> of the conditions (<b>Table 1A</b> in the EIR). The priority order for funding such intersection improvements will be determined by the Director in consultation with the affected jurisdictions. If the fees are used to fund an intersection improvement in another jurisdiction, the County will enter into an agreement with such jurisdiction to address the timing for the County to provide the funding, the timing for the relevant jurisdiction to complete the improvement, and any other matters that the County determines to be appropriate.</li> <li>2) <b>Substitute Mitigation.</b> If the Director determines that it is not feasible to use the fees for the specified intersection improvements (e.g., it does not appear that there will be full funding for the improvements within a reasonable time; the public agencies with authority or jurisdiction over the improvement projects will not approve the projects), then the fees may be used to fund off-campus projects that encourage and improve the use of alternative transportation modes or otherwise reduce peak period traffic in the local impact area, including but not limited to transit improvements that would directly or indirectly benefit the local impact area or transportation improvements that increase safety and mobility for pedestrians, bicyclists and transit users provided there is substantial evidence demonstrating how the improvements would remove motor vehicle trips from the local impact area.</li> </ol>				

**TABLE A  
MITIGATION MONITORING & REPORTING PROGRAM**

Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>6. <b>Annual Monitoring Report.</b> The Annual Monitoring Report shall include all of the following:</p> <ul style="list-style-type: none"> <li>a. All baselines established pursuant to these Conditions of Approval and calculations supporting those baselines.</li> <li>b. The average annual traffic counts before application of any adjustments or trip credits.</li> <li>c. All adjustments to the average annual traffic counts (number of trips subtracted due to cut-through trips or hospital parking, number of trips added due to use of lots or other parking areas outside the cordon line by campus-related trips) and an explanation of how those adjustments were determined.</li> <li>d. Identification of the AM and PM peak hours and peak periods and an explanation of how those periods were determined.</li> <li>e. All trip credits shall be reported in the annual monitoring report. Trip credits that reduce trips during the peak hours will be tracked separately from trip credits that reduce trips within the peak periods. The Director shall also provide an appendix with the following information: a description of the programs, services or projects for which trip credits have been approved, the number of credits granted for each project, the methodology used to calculate/substantiate the trip credits for each project, and any relevant information about the time horizon of trip credits (if applicable and approved).</li> </ul> <p>7. <del>On-Campus Safe Routes to School. As proposed by Stanford in the 2018 GUP Application, Stanford will implement the Safe Routes to School improvements proposed in the 2018 GUP Application as identified below, prior to authorization of Phase 2:</del></p> <ul style="list-style-type: none"> <li>a. <del>Construct improvements on its lands in unincorporated Santa Clara County that have been identified by the Palo Alto Unified School District (PAUSD) and the City of Palo Alto as the Suggested Routes to Schools shown on the Walkabout Maps for Nixon and Escondido Elementary Schools.</del></li> <li>b. <del>a. All improvements required by this condition of approval shall be installed in accordance with a detailed improvement plan to be reviewed and approved by the Director.</del></li> </ul>				

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Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>c. <del>Circulation improvements in and around Nixon Elementary School, including improved sidewalks, crosswalks with high visibility yellow markings, pavement markings, additional signage, wayfinding signs, and other potential improvements.</del></p> <p>d. <del>Circulation improvements in and around Escondido Elementary School, including improved sidewalks, crosswalks with high visibility yellow markings, pavement markings, additional signage, additional traffic control, an enhanced mid-block crosswalk on Escondido, and other potential improvements.</del></p> <p>8. <del><b>Safe Routes to School Study and Improvements.</b> Stanford shall implement the following:</del></p> <p>a. <del><b>Safe Routes to School Study.</b> If upon notification to the Director that additional K-12 students residing on the Stanford campus result in a change in attendance boundaries or new school that requires new or altered routes to school for K-12 residents of the Stanford campus, Stanford shall provide funding to the City of Palo Alto for a study to identify these safe routes to school and associated improvements in an amount not to exceed \$20,000 per affected campus. Payment shall be required within 30 days of notification by the Director of the required amount.</del></p> <p>b. <del><b>Safe Routes to School Improvements.</b> If a safe routes to school study prepared pursuant to this condition identifies the need for improvements to achieve safe routes to school for Stanford residents, Stanford shall provide fair share funding to the City of Palo Alto, proportional to its share of the students utilizing the routes, for the design and construction of such improvements. Payment shall be required within 30 days of notification to Stanford by the Director of the required amount.</del></p> <p>c.a. <del><b>Crossing Guard Funding.</b> If upon notification to the Director that additional Palo Alto Unified School District students resulting from additional development on the Stanford campus require additional crossing guards for safe routes to school, Stanford shall pay a fair share percentage of the ongoing cost of providing the additional crossing guards, based on the percentage of total students utilizing the additional crossing guard services represented by students who live on the Stanford campus. Stanford shall make payments to the City of Palo Alto consistent with the amounts and payment schedule provided by the Director.</del></p>				

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Mitigation Measures	Mitigation Responsibility	Mitigation Schedule	Monitoring and Reporting Program Responsibility	Monitoring Actions/Schedule and Verification of Compliance
<b>Transportation and Traffic (cont.)</b>				
<p>9. <del>Off-Campus Bicycle Improvements</del>. As proposed by Stanford and documented in the Final EIR (Section 3.8.3), Stanford shall provide evidence to the satisfaction of the Director that it has contributed funding to the appropriate jurisdiction for the following projects prior to issuance of the first building permit under this GUP:</p> <p>a. <del>East Palo Alto: Clark Avenue-Newell Road Connections (\$450,000).</del></p> <p>b. <del>Palo Alto: Hanover Street/BoI Park (\$250,000).</del></p> <p>c. <del>Menlo Park: Oak Grove Avenue Connection (\$250,000).</del></p> <p>d. <del>a. Unincorporated San Mateo County: Santa Cruz Avenue-Alameda de Las Pulgas (\$250,000).</del></p>				
<b>Environmental Consequences of Stanford Providing Off-campus Housing under Proposed Project</b>				
<p><b>Mitigation Measure 7A.17-1:</b> The local governmental agencies in which off-campus housing would be located can and should mitigate the environmental impacts from off-campus housing to the extent feasible.</p>	Affected jurisdictions	Ongoing	Affected jurisdictions	N/A