



MITIGATION MONITORING + REPORTING PROGRAM

PROJECT NAME	Cubberley Community Center Conceptual Master plan	STATE CLEARINGHOUSE NUMBER	2026030129
APPLICANT	City of Palo Alto, Community Services Department 250 Hamilton Avenue Palo Alto, California 94301	DATE	April 2026

The Final Initial Study – Mitigated Negative Declaration (IS-MND) for the Cubberley Community Center Conceptual Master Plan Project identifies the mitigation measures that must be implemented to reduce the impacts associated with the project.

California Environmental Quality Act (CEQA) Section 21081.6 requires a public agency to adopt a monitoring and reporting program for assessing and ensuring compliance with any required mitigation measures applied to proposed development. As stated in section 21081.6(a)(1) of the Public Resources Code:

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

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

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



MITIGATION MONITORING + REPORTING PROGRAM

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
AIR QUALITY			
<p>AQ-1 Construction Emissions Reduction. Prior to construction activity and issuance of building permits, the property owner or their designee shall ensure that the following specifications are detailed in the building plan, and any contractor agreements and ensure that they be implemented during construction:</p> <ul style="list-style-type: none"> ◆ All mobile off-road equipment (wheeled or tracked) over 25 horsepower during Phase I, Phase II, and Phase III of the building construction sub-phase shall meet the USEPA Tier 4 final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards. Construction equipment under 25 horsepower during those phases would be equipped with Level 3 diesel particulate matter Filters. ◆ All mobile off-road equipment (wheeled or tracked) over 25 horsepower during Phase II demolition phase shall meet the USEPA Tier 4 final standards. Tier 4 certification can be for the original equipment or equipment that is retrofitted to meet the Tier 4 Final standards. 	Contractor in Coordination with CSD/PWE	Prior to construction activity and issuance of building permits	City of Palo Alto Planning & Development Services Department
GEOLOGY AND SOILS			
<p>GEO-1 Geotechnical Investigation. Prior to approval of grading permits for any building associated with the proposed Master Plan, a detailed final geotechnical investigation shall be performed to identify significant geotechnical constraints on the proposed development. The report shall develop formal recommendations for project design and construction, including site grading/soil preparation and foundation design. Among other components, the report shall include a quantitative evaluation of liquefaction susceptibility, including projected levels of post-liquefaction settlement; an evaluation of soil shrink-swell potential; and an investigation of compressible soils that may be prone to settlement/subsidence. The report shall be stamped and signed by a professional engineer (PE) or geotechnical engineer and provided by the applicant to the City of Palo Alto for review to ensure that foundations designed for all proposed structures are appropriate and meet code requirements. The PE or geotechnical engineer of record shall also review the final grading, drainage, and foundation plans to confirm incorporation of the report recommendations.</p>	Contractor in Coordination with CSD/PWE	Prior to approval of grading permits	City of Palo Alto Planning & Development Services Department and Public Works Engineering

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
<p>GEO-2 Discovery of Paleontological Resources. Construction activities associated with the development allowed under the Master Plan shall adhere to the following measures.</p> <p>1. Initial Demolition and Construction. Prior to demolition or construction activities associated with the Master Plan, the applicant or its designee will retain a qualified paleontologist to provide on-call services in the event of an unanticipated discovery. A qualified professional paleontologist is defined by the SVP standards as an individual preferably with an M.S. or Ph.D. in paleontology or geology who is experienced with paleontological procedures and techniques, who is knowledgeable in the geology of California, and who has worked as a paleontological mitigation project supervisor for a least two years (SVP 2010). Prior to the start of construction, the qualified paleontologist or their designee shall conduct a Paleontological Worker Environmental Awareness Program (WEAP), a training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. The WEAP shall be fulfilled at the time of a preconstruction meeting at which a Qualified Paleontologist shall attend.</p> <p>In accordance with SVP (2010) guidelines, in the event that undetected buried resources are encountered, all work shall halt in the immediate vicinity of the find and the qualified professional paleontologist shall be notified to evaluate the discovery. The qualified paleontologist shall determine the significance of the discovery and identify whether additional mitigation or treatment is warranted. Measures may include testing, data recovery, reburial, archival review and/or transfer to the appropriate museum or educational institution. All testing, data recovery, reburial, archival review or transfer to research institutions related to monitoring discoveries shall be determined by the qualified paleontologist and shall be reported to the City. Work in the area of the discovery will resume once the find is properly documented and authorization is given to resume construction work.</p> <p>2. Excavation Below 18 Feet. Prior to the commencement of grading and excavation below a depth of 18 feet for any project associated with the Master Plan, applicants shall retain a qualified paleontologist approved by the City of Palo Alto to monitor grading and excavation activities. Full-time monitoring onsite shall occur whenever excavation activities exceed 18 feet below ground surface. The duration and timing of the monitoring will be determined by the qualified paleontologist and the location and extent of proposed ground disturbance. If the qualified paleontologist determines that full-time monitoring is no longer warranted, based on the specific geologic conditions at the surface or at depth, he/she may recommend that monitoring be reduced to periodic spot-checking or cease entirely. Any paleontological resources discovered by construction personnel or</p>	<p>Contractor in Coordination with CSD</p>	<p>Prior to and during construction.</p>	<p>City of Palo Alto Planning & Development Services Department</p>

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
--------------------	--------------------------------	----------------------	-----------------------------

subcontractors shall be reported immediately to the paleontologist. In the event undetected buried resources are encountered during grading and excavation, all work in the immediate vicinity of the find shall cease and the paleontologist shall evaluate the resource and propose appropriate mitigation measures. Measures may include testing, data recovery, reburial, archival review and/or transfer to the appropriate museum or educational institution. All testing, data recovery, reburial, archival review or transfer to research institutions related to monitoring discoveries shall be determined by the qualified paleontologist and shall be reported to the City.

HAZARDS AND HAZARDOUS MATERIALS

HAZ-1 Site Risk Management Plan. Prior to issuance of permits allowing groundwater dewatering or earth-disturbing activity, the developer shall prepare a site risk management plan (SRMP). The SRMP will address known and unknown environmental issues that may be encountered during development. The plan shall identify appropriate measures to be followed when impacted soil and groundwater are encountered during demolition, excavation, dewatering, and construction. This includes health and safety measures to reduce exposure to potentially impacted soil and groundwater for construction workers and dust control measures to reduce exposure to contaminated dust particles for nearby residents.

Contractor in Coordination with CSD

Prior to issuance of grading permits

City of Palo Alto Planning & Development Services Department and Fire Department

Health and safety measures shall include the required personal protective equipment (PPE) to be used by site personnel, including action levels and decision criteria for upgrading the levels of PPE. The SRMP shall also identify personnel to be notified, emergency contacts, and a sampling protocol if impacted media is encountered. The excavation and demolition contractors shall be made aware of the possibility of encountering known and unknown hazardous materials including impacted soil and groundwater; and shall be provided with appropriate contact and notification information. The plan shall include a provision stating at what point it is safe to continue with the excavation or demolition, and identify the person authorized to make that determination. In addition, the SRMP shall include measures for the appropriate handling and profiling of impacted soil and groundwater to be removed from the project site and disposed offsite. Removal, transportation, and disposal of impacted soil and groundwater shall be performed in accordance with applicable federal, state, and local laws, regulations, and ordinances.

The SMRP shall be submitted to the City of Palo Alto for review and approval prior to issuance of a grading or building permit. If deemed necessary by City staff, the SRMP shall also be submitted to the Santa Clara County Department of Environmental Health for review and oversight.

Mitigation Measure	Responsible for Implementation	Timing of Compliance	Oversight of Implementation
Noise			
<p>NOI-1 Prepare and Enforce Amphitheater Noise Level Performance Standard Prior to and During Operation. Prior to the first event held at the amphitheater with amplified noise, the City shall create a Sound Amplification Design Plan to minimize special event noise at nearby sensitive receptors by instituting a performance standard to not exceed 80 dBA at a distance of 50 feet from the speakers (in accordance with Section 9.10.050 of the PAMC). Design measures may include, but are not limited to, bandwidth and peak limiter installation, and speaker angle and directivity techniques. Speaker and equipment settings (i.e., volume, equalization levels, etc.) shall be maintained for subsequent special events for continued compliance with the City’s noise thresholds. In addition, the appropriate permit shall be obtained prior to each special event/performance held at the amphitheater.</p>	CSD	Prior to use of amplified noise	City of Palo Alto Planning & Development Services Department and Police Department
TRANSPORTATION			
<p>TRA-1 Design Hazards and Emergency Access Improvements. Prior to issuance of building permits for the Master Plan, the City shall complete the recommendations outlined in the Transportation Analysis completed in February 2026 by Hexagon Transportation Consultants, including the following:</p> <ul style="list-style-type: none"> ◆ The project access points shall be designed so that there is adequate sight distance ensuring that exiting vehicles can see pedestrians on the sidewalk and vehicles and bicycles traveling along Middlefield Road. Similarly, on-site parking lot exits should be clear of any obstructions. ◆ The final design shall ensure any landscaping and signage is located in such a way to ensure an unobstructed view for drivers exiting driveways. ◆ The final site design shall ensure minimum 20-foot-wide drive aisles for emergency vehicle access and no dead-end aisles longer than 150 feet. ◆ The final site design shall ensure adequate curb radii is provided so that emergency vehicles can travel through the project site and turn into and out of the project site. 	Contractor in Coordination with CSD	Prior to issuance of building permits	City of Palo Alto Planning & Development Services Department and Office of Transportation