## MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

North Iris Project (PHG20-0032, PL20-0738, PL20-0739, PL21-0126, PL21-0127 PL21-0128 and PHG20-0032). SCH No. 2021060702

## INTRODUCTION AND SUMMARY

Pursuant to Section 21081.6 of the Public Resources Code and the *California Environmental Quality Act (CEQA) Guidelines* Section 15097, public agencies are required to adopt a monitoring or reporting program to assure that mitigation measures and revisions identified in Final Environmental Impact Report (FEIR) are implemented. As stated in Section 21081.6 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."

Pursuant to Section 21081(a) of the Public Resources Code, findings must be adopted by the F5 makers coincidental to certification of the FEIR. The Mitigation Monitoring and Reporting Program (MMRP) must be adopted when making the findings (at the time of approval of the project).

As defined in the CEQA Guidelines, Section 15097, "reporting" is suited to projects that have readily measurable or quantitative measures or which already involve regular review. "Monitoring" is suited to projects with complex mitigation measures, such as wetland restoration or archaeological protection, which may exceed the expertise of the local agency to oversee, are expected to be implemented over a period of time or require careful implementation to assure compliance. Both reporting and monitoring would be applicable to the proposed project.

## **MITIGATION MATRIX**

To sufficiently track and document the status of mitigation measures, a mitigation matrix has been prepared and includes the following components:

- Impact
- Mitigation Measure
- Action
- Timing
- Responsibility

The mitigation matrix is included in Table 0.4-1. Additionally, the project will be required to adhere to the project design and compliance measures listed in Table 0.4-2.

Table 0.4-1. North Iris Residential Project Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Action	Timing	Responsibility
BIOLOGICAL RESOURCES				
BIO-1 The Project has the potential to impact avian species protected under the MBTA if tree removal, vegetation removal, or other construction activities occur during the nesting season.	MM-BIO-1 Trimming, grubbing, and clearing of vegetation shall be avoided during the avian breeding season, which generally runs from February 15 to August 31 (as early as January 1 for some raptors) to the extent feasible. If trimming, grubbing, or clearing of vegetation is proposed to occur during the general avian breeding season, a preconstruction survey shall be conducted by a qualified biologist no more than seven days prior to vegetation clearing to determine if active bird nests are present in the affected areas. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, trimming, grubbing, and clearing of vegetation shall be allowed to proceed. If active bird nests are confirmed to be present during the pre-construction survey, a buffer zone will be established by the biologist. Construction activities shall avoid any active nests until a qualified biologist has verified that the young have fledged, or the nest has otherwise become inactive.	If construction is proposed during the breeding season, conduct a preconstruction survey. If nesting birds are present, implement buffer zone and avoidance measures.  If nesting birds are not detected during the preconstruction survey, no further mitigation is required.	For construction activities proposed for the period of February 15 through August 31, conduct survey within seven days prior to the start of construction activities.	Applicant/Land Owner, Project Biologist, Contractor
BIO-2 Direct impact to 0.1 acre of disturbed wetland and 2.5 acres of non-native grassland.	MM-BIO-2 Prior to impacts to any sensitive habitats (disturbed wetland and non-native grassland), the applicant shall purchase off-site mitigation credits at a mitigation bank approved by the City. Mitigation ratios shall be consistent with regional standards (i.e., the Escondido Draft Subarea Plan): non-native grassland minimum 0.5:1 and disturbed wetland minimum 1:1. The disturbed wetland mitigation shall consist of establishment/re-establishment mitigation to achieve regional no-net-loss standards for potential wetlands. Proof of mitigation purchase shall be provided to the City prior to issuance of the grading permit. Prior to	approved mitigation bank submitted to the City Director of Development	Prior to issuance of grading permit.	Applicant/Land Owner, Project Biologist

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	impacts to any sensitive habitats (disturbed wetland and non-native grassland), the applicant shall purchase off-site mitigation credits at a mitigation bank approved by the City. Mitigation ratios shall be consistent with regional standards (i.e., the Escondido Draft Subarea Plan): non-native grassland minimum 0.5:1 and disturbed wetland minimum 1:1. The disturbed wetland mitigation shall consist of establishment/re-establishment mitigation to achieve regional no-net-loss standards for potential wetlands. Proof of mitigation purchase shall be provided to the City prior to issuance of the grading permit.			
BIO-3 Direct impact to a total of 0.05 acre (494 linear feet) of USACE/RWQCB jurisdiction (non-wetland water of the US/ water of the State) and to 0.12 acre of CDFW jurisdictional areas consisting of 0.10 acre of disturbed wetland and 0.02 acre of streambed. The 0.05 acre of USACE/RWQCB occur within the CDFW jurisdictional limits.	<ul> <li>MM-BIO-3 Prior to any project impacts to potentially jurisdictional resources, demonstration that regulatory permits from USACE, RWQCB, and CDFW have been issued or that no such permits are required shall be provided to the City. Permanent impacts to 0.05 acre of USACE/RWQCB jurisdictional non-wetland waters of the United States/State, 0.10 acre of CDFW jurisdictional habitat, and 0.02 acre of CDFW jurisdictional streambed shall be mitigated at a minimum 1:1 ratio through one or a combination of the following off-site options, unless otherwise required by the USACE, RWQCB, and/or CDFW during the regulatory permitting process:</li> <li>Purchase of establishment/re-establishment, rehabilitation, enhancement, and/or preservation credits from an off-site mitigation bank with a service area that overlaps the project and that is approved by the USACE, RWQCB, and CDFW, such as the San Luis Rey Mitigation Bank, and Brook Forest Conservation/Mitigation Bank; and/or</li> <li>Acquisition or use of other off-site mitigation lands in the region to include establishment/re-establishment, rehabilitation, enhancement, and/or</li> </ul>	Provide proof of regulatory permits or documentation that permits are not required. Provide proof of purchase of mitigation credits and /or acquisition or use of other offsite mitigation lands submitted to City Director of Development Services.	Prior to issuance of grading permit.	Applicant/Land Owner, Project Biologist, Contractor

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	preservation of USACE, RWQCB, and CDFW jurisdictional resources.  Mitigation for RWQCB-jurisdictional waters shall include a minimum 1:1 establishment/ reestablishment to ensure nonet-loss. Final mitigation requirements shall be determined during the permitting process in coordination with the USACE, RWQCB, and CDFW, as appropriate.			
BIO-4 Potential for impacts to 11 protected oak trees and 12 mature oak trees both on- and off-site.	MM-BIO-4 The project applicant shall replace impacted mature trees at a minimum 1:1 ratio, unless otherwise determined by the City. The project applicant shall replace protected trees at a minimum 2:1 ratio, unless otherwise determined by the City. The number, size, and species of replacement trees shall be determined on a case-by-case basis by the City's Director of Community Development. This condition can be satisfied on-site if the project's landscape plans include the appropriate number of oak trees and other tree species.	Review/approve landscape plans	Prior to certificate of occupancy.	Applicant/Land Owner, Project Biologist, Director of Community Development
BIO-5 Removal of trees on the project site has the potential to result in the spread of tree insect pests and disease leading to expediting the loss of oaks, alders, sycamore, and other trees in California which support a high biological diversity including special status species.	MM-BIO-5 The project applicant shall prepare an infectious tree disease management plan for the project. This plan should include a description of how the infectious tree disease management plan will be implemented. All trees that would be removed by the project should be inspected for contagious tree diseases including, but not limited to, thousand canker fungus (Geosmithia morbida), polyphagous shot hole borer (Euwallacea spp.), and goldspotted oak borer (Agrilus auroguttatus). To avoid the spread of infectious tree diseases, diseased trees should not be transported from the project site without first being treated using best available management practices relevant for each tree disease observed.	Review/approve infectious tree disease management plan. Implement management and avoidance measures.	Prior to issuance of grading permit.	Applicant/Land Owner, Project Biologist or Arborist.

Impact	Mitigation Measure	Action	Timing	Responsibility		
CULTURAL RESOURCES/T	CULTURAL RESOURCES/TRIBAL CULTURAL RESOURCES					
CR-1 Due to grading and ground disturbing activities, the Project has the potential to impact unidentified archaeological resources on the Project site.	MM-CR-1 Prior to the issuance of a grading permit, the Applicant shall enter into a Tribal Cultural Resource Treatment and Monitoring Agreement (also known as a Pre-Excavation Agreement) with a tribe that is traditionally and culturally affiliated with the Project Location ("TCA Tribe"). The purposes of the agreement are (1) to provide the Applicant with clear expectations regarding tribal cultural resources, and (2) to formalize protocols and procedures between the Applicant/Owner and the TCA Tribe for the protection and treatment of, including but not limited to, Native American human remains, funerary objects, cultural and religious landscapes, ceremonial items, traditional gathering areas and cultural items, located and/or discovered through a monitoring program in conjunction with the construction of the Project, including additional archaeological surveys and/or studies, excavations, geotechnical investigations, grading, and all other ground-disturbing activities. The agreement shall incorporate, at a minimum, the performance criteria and standards, protocols, and procedures set forth in mitigation measures MM-CR-2 through MM-CR-10, and the following information:  • Parties entering into the agreement and contact information.  • Responsibilities of the Property Owner or their representative, archaeological monitors, and tribal monitors.  • Project grading and development scheduling, including determination of authority to adjust in the event of unexpected discovery, and terms of compensation for the monitors, including overtime and weekend rates, in addition to mileage reimbursement.	Enter into Tribal Cultural Resources Treatment and Repatriation Agreement.	Prior to issuance of Grading Permit and/or during all earth moving and ground disturbing activity.	Applicant/ Landowner, TCA Tribe		

Impact	Mitigation Measure	Action	Timing	Responsibility
	<ul> <li>Requirements in the event of unanticipated discoveries, which shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, analysis of identified cultural materials, and on-site storage of cultural materials.</li> <li>Treatment of identified Native American cultural materials.</li> <li>Treatment of Native American human remains and associated grave goods.</li> <li>Confidentiality of cultural information including location and data.</li> <li>Negotiation of disagreements should they arise.</li> <li>Regulations that apply to cultural resources that have been identified or may be identified during project construction.</li> </ul>			
	MM-CR-2 Prior to issuance of a grading permit, the Applicant shall provide written verification to the City that a qualified archaeologist and a Native American monitor associated with a TCA Tribe have been retained to implement the monitoring program. The archaeologist shall be responsible for coordinating with the Native American monitor. This verification shall be presented to the City in a letter from the Project archaeologist that confirms the selected Native American monitor is associated with a TCA Tribe. The City, prior to any pre-construction meeting, shall approve all persons involved in the monitoring program.	Provision of written verification that qualified archaeologist and Native American monitor associated with a TCA Tribe.	Prior to issuance of Grading Permit.	Applicant/Land Owner

Impact	Mitigation Measure	Action	Timing	Responsibility
	MM-CR-3 The qualified archaeologist and a Native American monitor shall attend all applicable pre-construction meetings with the General Contractor and/or associated subcontractors to explain and coordinate the requirements of the monitoring program.	Attend pre- construction meetings	Prior to and during all earth moving and ground disturbing activity.	Applicant/ Landowner, Archaeologist, Native American Monitor.
	MM-CR-4 During the initial grubbing, site grading, excavation or disturbance of the ground surface (including both on- and off-site improvement areas), the qualified archaeologist and the Native American monitor shall be present full-time. If the full-time monitoring reveals that the topsoil throughout the Project impact area (both on and off-site) has been previously removed during the development of the roads and buildings within the Project area, then a decrease of monitoring to part-time monitoring or the termination of monitoring can be implemented, as deemed appropriate by the qualified archaeologist in consultation with the Native American monitor. The frequency of subsequent monitoring shall depend on the rate of excavation, the materials excavated, and any discoveries of tribal cultural resources as defined in California Public Resources Code Section 21074. The qualified archaeologist, in consultation with the Native American monitor, shall be responsible for determining the duration and frequency of monitoring considering these factors. Archaeological and Native American monitoring will be discontinued when the depth of grading and soil conditions no longer retain the potential to contain cultural deposits (i.e., soil conditions are comprised solely of fill or granitic bedrock).	Full-time Monitoring and determination of duration and frequency of subsequent monitoring.	During the initial grubbing, site grading, excavation or disturbance of the ground surface (including both onand off-site improvement areas)	Archaeologist, Native American Monitor
	MM-CR-5 In the event that previously unidentified tribal cultural resources are discovered, all work must halt within a 100-foot radius of the discovery. The qualified archaeologist and the Native American monitor shall evaluate the significance of the find and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The qualified archaeologist and Native American	If potential tribal cultural resources are found, halt ground disturbance and follow	During all earth moving and ground disturbing activity.	Archaeologist, Native American Monitor

Impact	Mitigation Measure	Action	Timing	Responsibility
	Monitor shall consider the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c) in determining the significance of a discovered resource. If the professional archaeologist and Native American monitor determine that the find does not represent a culturally significant resource, work may resume immediately, and no agency notifications are required. Isolates and clearly non-significant deposits shall be documented in the field and collected and monitored grading can immediately proceed. All unearthed archaeological resources or tribal cultural resources shall be collected, temporarily stored in a secure location, and repatriated for later reburial on the project site, pursuant to the terms of the Pre-Excavation Agreement.	procedures listed for discovery.		
	MM-CR-6 If the qualified archaeologist and Native American monitor determine that the find does represent a potentially significant tribal cultural resource, considering the criteria identified by California Public Resources Code sections 21083.2(g) and 21074, and CEQA Guidelines sections 15064 and 15064.5(c), the archaeologist shall immediately notify the City of said discovery. The qualified archaeologist, in consultation with the City, the consulting TCA Tribe(s), and the Native American monitor, shall determine the significance of the discovered resource. A recommendation for the tribal cultural resource's treatment and disposition shall be made by the qualified archaeologist in consultation with the TCA Tribe(s) and be submitted to the City for review and approval. If the find is determined to be a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) though (c), appropriate treatment measures will be implemented. Work may not resume within the no-work radius until the City, through consultation as set forth herein, determines either that: 1) the discovery does not constitute a Tribal Cultural Resource under CEQA, as defined in California Public Resources Code Section 21074(a) through (c); or 2) the	If potential tribal cultural resource is determined to be significant, notify the City and follow agreed upon treatment and disposition measures.	During all earth moving and ground disturbing activity.	Archaeologist, Native American Monitor, City Director of Development Services

Impact	Mitigation Measure	Action	Timing	Responsibility
	approved treatment and disposition measures have been completed.			
	MM-CR-7 All sacred sites, significant tribal cultural resources, and unique archaeological resources encountered within the Project area shall be avoided and preserved as the preferred mitigation. The avoidance and preservation of the significant tribal cultural resource or unique archaeological resource must first be considered and evaluated in consultation with the TCA Tribe(s) as required by CEQA and in compliance with all relevant mitigation measures for the Project. If any significant tribal cultural resource or unique archaeological resource has been discovered and such avoidance or preservation measure has been deemed to be infeasible by the City's Director of Community Development (after a recommendation is provided by the qualified archaeologist, in consultation with the TCA Tribe(s), making a determination of infeasibility that takes into account the factors listed in California Public Resources Code sections 21061.1, 21081(a)(3), and CEQA Guidelines section 15091, and in accordance with all relevant mitigation measures for the Project), then culturally appropriate treatment of those resources, including but not limited to funding an ethnographic or ethnohistoric study of the resource(s), and/or developing a research design and data recovery program to mitigate impacts shall be prepared by the qualified archaeologist (using professional archaeological methods), in consultation with the TCA Tribe and the Native American monitor, and shall be subject to approval by the City. No artifact sampling for analysis is allowed, unless requested and approved by the consulting TCA Tribe(s). Before construction activities are allowed to resume in the affected area, the research design and data recovery program activities must be concluded to the satisfaction of the City.	If sacred sites, significant tribal cultural resources, and unique archaeological resources are found, halt ground disturbance and follow procedures listed for discovery including avoidance, treatment and disposition.	During all earth moving and ground disturbing activity.	Archaeologist, Native American Monitor, City Director of Development Services

Impact	Mitigation Measure	Action	Timing	Responsibility
	MM-CR-9 If the qualified archaeologist elects to collect any tribal cultural resources, the Native American monitor must be present during any cataloging of those resources. Moreover, if the qualified archaeologist does not collect the cultural resources that are unearthed during the ground-disturbing activities, the Native American monitor may, at their discretion, collect said resources for later reburial on the Project site or storage at a local curation facility. Any tribal cultural resources collected by the qualified archaeologist shall be repatriated to the TCA Tribe for reburial on the Project site. Should the TCA Tribe(s) decline the collection, the collection shall be curated at the San Diego Archaeological Center. All other resources determined by the qualified archaeologist, in consultation with the Native American monitor, to not be tribal cultural resources, shall be curated at the San Diego Archaeological Center.	Follow procedures for collection of tribal cultural resources.	During all earth moving and ground disturbing activity.	Archaeologist, Native American Monitor
	MM-CR-10 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, that describes the results, analysis, and conclusions of the archaeological monitoring program and any data recovery program on the Project site, shall be submitted by the qualified archaeologist to the City. The Native American monitor shall be responsible for providing any notes or comments to the qualified archaeologist in a timely manner to be submitted with the report. The report will include California Department of Parks and Recreation Primary and Archaeological Site Forms for any newly discovered resources. A copy of the final report will be submitted to the South Coastal Information Center after approval by the City.	Preparation of a monitoring report and/or evaluation report if necessary.	Prior to release of Grading Bond.	Archaeologist, Native American Monitor
CR-2 There is a potential for Project construction activities to disturb previously unidentified human	MM-CR-8 As specified by California Health and Safety Code section 7050.5, if human remains are found on the Project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Coroner's office. Determination of whether the	If human remains are found, halt ground disturbance and follow	During all earth moving and ground disturbing activity.	Archaeologist

Impact	Mitigation Measure	Action	Timing	Responsibility
remains on the Project site.	remains are human shall be conducted on site and in situ where they were discovered by a forensic anthropologist, unless the forensic anthropologist and the Native American monitor agree to remove the remains to a temporary off-site location for examination. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Coroner has made the necessary findings as to origin and disposition. A temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the project (California Public Resources Code § 5097.98) for proper treatment and disposition in accordance with California Public Resources Code section 5097.98. The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the City does not agree with the recommendations of the MLD, the NAHC can mediate (California Public Resources Code § 5097.94). If no agreement is reached, the remains shall be kept in situ, or reburied in a secure location in close proximity to where they were found and where they will not be further disturbed (California Public Resources Code § 5097.98). Work may not resume within the no work radius until the lead agency, through consultation as appropriate, determines that the treatment measures have been completed to their satisfaction. The analysis of the remains shall only occur on site in the presence of the MLD, unless the forensic anthropologist and the MLD agree to remove the remains to an off-site location for examination.	procedures listed for discovery.		

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GEOLOGY AND SOILS	GEOLOGY AND SOILS						
GEO-1 The Project has the potential to disturb previously unknown paleontological resources during Project grading.	MM-GEO-1 Prior to project grading the project applicant shall retain a qualified paleontologist to review the proposed project area to determine the potential for paleontological resources to be encountered. If there is a potential for paleontological resources to occur, the paleontologist shall identify the area(s) where these resources are expected to be present, and a qualified paleontological monitor shall be retained to monitor the initial cut in any areas that have the potential to contain paleontological resources.	Site review and if potential for paleontological resources is identified, monitoring of initial cut in any areas that have the potential for resources. construction activities and filing of mitigation report.	Prior to grading and if applicable during initial cut.	Paleontologist			
HAZARDS AND HAZARDOL	JS MATERIALS						
HAZ-1 Improper removal of asbestos-containing materials and lead-based paint during demolition could expose construction workers to a hazardous release of asbestos or lead.	MM HAZ-1a Prior to demolition activities on the project site, the Applicant shall submit verification to the City of Escondido Building Department that an asbestos survey has been conducted on any buildings that are to be demolished or removed from the project site. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of to properly abate and dispose of all on-site asbestos-containing materials before general demolition activities commence.  MM HAZ-1b Prior to demolition activities on the project site, the Applicant shall submit verification to the City of Escondido Building Department that a lead-based paint survey has been conducted at all existing buildings located on the project site. If lead-based paint is found, the applicant shall follow all OSHA procedural requirements and regulations for its proper removal and disposal before general demolition activities commence.	Submit verification that asbestos and lead-based paint surveys have been conducted. If found, follow all procedural requirements for abatement, removal and disposal.	Prior to demolition activities.	Applicant/ Landowner/ Contractor			

Impact	Mitigation Measure	Action	Timing	Responsibility
HAZ-2 Undocumented fill material located at 2039 North Iris Lane may contain contaminated materials.	MM HAZ-2 Prior to construction activities on the project site, the Applicant shall submit verification that the undocumented fill material placed in front of 2039 North Iris Lane has been removed or evaluated for the potential for contaminants. If contaminated, the soil must be removed and disposed of according to local and state regulations. If contaminated soil is identified, the applicant shall follow all procedural and regulatory requirements for its proper removal and disposal before general construction activities commence.	Submit verification that the undocumented fill has been removed or evaluated for contaminants. If contaminated, follow local and state regulations for removal and disposal.	Prior to construction	Applicant/ Landowner/ Contractor
NOISE				
N-1 If rock drill staging occurs within 160 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dBA at property lines.	MM-N-1 If rock drill staging occurs within 160 feet of any occupied noise sensitive land uses, sound levels could exceed 75 dBA at property lines. A noise mitigation plan based upon the location of the construction equipment, topography and construction schedule shall be prepared by an acoustical consultant. The noise mitigation plan shall identify measures to reduce sound levels to below 75 dBA. Such measures could include a temporary noise barrier along any property line where the impacts could occur. The proposed noise barrier shall be of solid non-gapping material to adequately reduce construction noise levels below the noise threshold of 75 dBA at the property lines. The noise mitigation plan shall determine the final height and location of a temporary barrier if one is necessary. The mitigation plan may also identify location and timing restrictions on drilling equipment usage. The mitigation plan shall be submitted to the City for review and approval prior to initiation of rock drill staging activities within 160 feet of any occupied noise sensitive land use.	Preparation of noise mitigation plan and implementation of identified measures including construction of temporary noise barriers.	Prior to commencement of rock drilling activities.	Applicant/ Landowner, Acoustical Engineer, City (Planning Division Manager)

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TRANSPORTATION				
TR-1 The project's per capita VMT exceeds the significance threshold of 15% below regional average.	<ul> <li>MM-TR-1a The project shall implement CAPCOA reduction measure T-1 (Increase Residential Density).</li> <li>MM-TR-1b The project applicant shall pay the City of Escondido \$67,500 for pedestrian improvements at the following five intersections to reduce VMT impacts:         <ul> <li>Intersection of Centre City Pkwy at Iris Lane (Install high visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).</li> <li>Intersection of El Norte at South Iris Lane (Install high visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).</li> <li>Intersection of Broadway at Vista Ave (Install high visibility crosswalks on each leg (4 crosswalks) and install pedestrian countdown timers on each corner (4 countdown timers)).</li> <li>Intersection of El Norte Parkway at Mountain View (Install pedestrian countdown timers on each corner (4 countdown timers)).</li> <li>Intersection of Country Club Lane at Broadway (Install high visibility crosswalk (3 crosswalks)).</li> </ul> </li> </ul>	Implement CAPCOA reduction measure and make payment for pedestrian improvements.	Fee payment shall be made prior to submittal of grading plans.	Applicant/Land Owner