

Exhibit O
Mitigation Monitoring and Reporting Program

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MITIGATION MONITORING AND REPORTING PROGRAM

This Mitigation Monitoring and Reporting Program (MMRP) lists mitigation measures recommended in the Tower Specific Plan Update EIR and identifies mitigation monitoring requirements, and is intended to ensure compliance during implementation of the project.

The MMRP is organized in a matrix format. The first column identifies the mitigation measure. The second column, entitled “Mitigation Responsibility,” refers to the party responsible for implementing the mitigation measure. The third column, entitled “Monitoring/Reporting Agency,” refers to the agency responsible for oversight or ensuring that the mitigation measure is implemented. The fourth column, entitled “Monitoring Timing/Schedule,” refers to when monitoring will occur to ensure that the mitigating action is completed.

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Mitigation Measures	Mitigation Responsibility	Monitoring/Reporting Agency	Monitoring Timing/Schedule
AIR QUALITY			
AIR-1a: Prior to future discretionary approval for projects that require environmental evaluation under CEQA, development project applicants shall prepare and submit to the Director of the Planning and Development Department, or designee, a technical health risk assessment (HRA) evaluating potential project construction phase-related air quality impacts. The evaluation shall be prepared in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology for assessing construction impacts. If construction-related air pollutants are determined to have the potential to exceed the SJVAPCD adopted threshold of significance, project applicants for new development projects shall be required to incorporate mitigation measures into construction plans to reduce air pollutant emissions during construction activities. Mitigation measures can include, but are not limited to: • Maintain construction equipment and provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [CCR Title 13, Sections 2449 and 2449.1] to SJVAPCD; and • Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated. Documentation of a certified mechanic's inspection and determinations shall be maintained by the Construction Manager and available for City inspection upon reasonable request. The identified measures shall be included as part of the project Conditions of Approval. If the recommendations of the HRA are insufficient to reduce impacts to levels at or below SJVAPCD's threshold of 20 in one million, such development with significant cancer risk (i.e., that exceed that threshold) shall be prohibited.	Project Applicant and qualified air quality consultant	Planning and Development Department	Assessments completed in conformance with SJVAPCD methodology to be completed during environmental review and prior to approval of discretionary project. The City shall ensure that project-specific mitigation is incorporated into project plans for approval prior to issuance of any grading or construction permits.
AIR-1b: Prior to future discretionary approval for projects that require environmental evaluation under CEQA, the City of Fresno (City) shall evaluate new development proposals for new industrial or warehousing land uses that: (1) have the potential to generate 100 or more truck trips per day or have 40 or more trucks with operating diesel-powered transport refrigeration units, and (2) are within 1,000 feet of a sensitive land use (e.g., residential, schools, hospitals, or nursing homes), as measured from the property line of the project to the property line of the nearest sensitive use. Such projects shall submit a HRA to the City Department of Development and Resource Management. The HRA shall be prepared in accordance with policies and procedures of the most current State Office of Environmental Health	Project Applicant and qualified air quality consultant	Planning and Development Department	Assessments completed in conformance with SJVAPCD methodology to be completed during environmental review and prior to approval of discretionary project. The City shall ensure that project-specific mitigation is incorporated into project plans for approval prior to issuance of any grading or construction permits.

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Hazard Assessment (OEHHA) and the SJVAPCD. If the HRA shows that the incremental health risks exceed their respective thresholds, as established by the SJVAPCD at the time a project is considered, the applicant will be required to identify and demonstrate that best available control technologies for toxics (T-BACTs), including appropriate enforcement mechanisms to reduce risks to an acceptable level. T-BACTs may include, but are not limited to: • Restrict idling on site by shutting equipment off when not in use or reducing idling time to 3 minutes as enforced by an identified compliance officer within the construction crew. Idling restrictions shall be enforced by highly visible posting at the site entry, posting at other on-site locations frequented by truck drivers, conspicuous inclusion in employee training and guidance material and owner, operator or tenant direct action as required; • Electrify warehousing docks to reduce diesel particulate matter; Reque use of newer equipment and/or vehicles; • Provide charging infrastructure for: electric forklifts, electric yard trucks, local drayage trucks, last mile delivery trucks, electric and fuel-cell heavy duty trucks; and/or • Install solar panels, zero-emission backup electricity generators, and energy storage to minimize emissions associated with electricity generation at the project site. T-BACTs identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site plan.			
AIR-1c: Locate new sensitive land uses (e.g., residences, schools, and daycare centers) to avoid incompatibilities with recommended buffer distances identified in the most current version of the California Air Resources Board (CARB) Air Quality and Land Use Handbook: A Community Health Perspective (CARB Handbook). Sensitive land uses that are within the recommended buffer distances listed in the CARB Handbook shall provide enhanced filtration units or submit a health risk assessment (HRA) to the City. If the HRA shows that the project would exceed the applicable SJVAPCD thresholds, mitigation measures capable of reducing potential impacts to an acceptable level must be identified and approved by the City.	Project Applicant and qualified air quality consultant	Planning and Development Department	Health Risk Assessment (HRA) to be completed during environmental review and prior to approval of discretionary project. The City shall ensure that project-specific mitigation is incorporated into project plans for approval prior to issuance of any grading or construction permits.
BIOLOGICAL RESOURCES			
BIO-1a: Avoidance Measures for Bats. 1. A qualified biologist with experience in assessing trees for bat roosts will survey all trees to within 500 feet of the construction footprint for suitability as bat roosts. If	Project Applicant and qualified biologist	Planning and Development Department	Pre-construction clearance survey to be completed during environmental review of project and prior to approval of

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a tree planned for removal is deemed suitable, the qualified biologist will conduct a night emergence survey of the suitable roost tree 1 to 2 nights prior to tree removal using night vision and/or infrared-sensitive camera equipment and bioacoustic recording equipment. If surveys are negative, trees should be removed immediately. 2. If night emergent surveys are positive, trees should be removed using a two-step process for 2 consecutive days and should be monitored by a qualified biologist. On the first day, small branches and small limbs that do not contain potential roost habitat (e.g., cavities, crevices, exfoliating bark) will be removed using chainsaws. On the second day, the remainder of the tree will be removed. The disturbance caused by chainsaw noise and vibration, coupled with the physical alteration of the tree will cause colonial bat species to abandon the roost tree after nightly emergence for foraging. Removing the tree the next day prevents re-habitation and re-occupation of the altered tree. 3. Any trees suitable as bat roost will be removed during one of the following periods to avoid harm to young or hibernating bats: - Between approximately March 1 and April 15 (or after evening temperatures rise above 45 degrees Fahrenheit [°F], and less than 0.5 inch of rainfall in 24 hours occurs). - After maternity season and prior to winter torpor or hibernation, September 1 through about October 15 (or before evening temperatures fall below 45°F, and prior to greater than 0.5 inch of rainfall within 24 hours). For trees that will not be removed but which are actively in use as a roost, a no disturbance buffer shall be implemented. If a maternity roost is confirmed, the no disturbance buffer will be 500 feet until it is confirmed that the young are no longer reliant on parental care or the bats have left the area. For all other roosts, the no disturbance buffer will be determined by the qualified biologist based on the conditions at the site and the planned construction activities. The qualified biologist may identify other avoidance measures to be implemented during construction, such as restricting work to specific times of day, to support no disturbance buffers of less than 50 feet.			discretionary project. The City shall ensure that project-specific mitigation is incorporated into project plans for approval prior to issuance of any grading or construction permits.
BIO-1b: Pre-activity Nesting Bird Surveys. If future development and site-specific project activities facilitated by the implementation of the Specific Plan Update must occur during the nesting season (February 15 to August 31), pre-activity nesting bird surveys will be conducted by a	Project Applicant and qualified biologist	Planning and Development Department, California	Pre-construction clearance survey to be completed during environmental review of project and prior to approval of discretionary project. The City shall

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qualified biologist in accordance with the California Department of Fish and Wildlife (CDFW) and/or the United States Fish and Wildlife Service (USFWS) no more than 7 days prior to the start of construction at the construction site, and a 250-foot buffer for songbirds and a 500-foot buffer for raptors (other than Swainson's hawk [<i>Buteo swainsoni</i>]) will be installed. If no active nests are found, no further action is required; however, note that nests may become active at any time throughout the summer, including when construction activities are occurring. If active nests are found during the survey or at any time during future project construction facilitated by implementation of the Tower District Specific Plan Update, the project proponent shall install an avoidance buffer ranging from 50 feet to 350 feet will be required, as determined by a qualified biologist. The avoidance buffer will remain in place until the biologist has determined that the young are no longer reliant on the nest. Work may occur within the avoidance buffer under the approval and guidance of the biologist. The qualified biologist will have the ability to stop construction if nesting adults show signs of distress.		Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS)	ensure that project-specific mitigation is incorporated into project plans for approval prior to issuance of any grading or construction permits.
CULTURAL RESOURCES			
CUL-1a: If previously unknown resources are encountered before or during grading activities, construction shall stop in the immediate vicinity of the find and a qualified historical resources specialist shall be consulted to determine whether the resource requires further study. The qualified historical resources specialist shall make recommendations to the City of Fresno on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the CEQA Guidelines and the City's Historic Preservation Ordinance. If the resources are determined to be unique historical resources as defined under Section 15064.5 of the CEQA Guidelines, measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the City of Fresno approves the measures to protect these resources. Any historical artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.	Project Applicant and qualified historical resources specialist	Planning and Development Department	Planning and Development Department to review contract specifications to ensure inclusion of provisions included in project-specific mitigation measure. Following discovery of previously unknown resource, a qualified historical resources specialist shall prepare and submit recommendations to the Planning and Development Department. Timing for recommendations shall be established by project-specific mitigation measure.
CUL-1b: Prior to approval of any discretionary project that could result in an adverse change to a potential historic and/or cultural resource, the City shall require a site-	Project Applicant and qualified	Planning and Development	Cultural resources study to be completed during environmental review and prior to

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specific evaluation of historic and/or cultural resources by a professional who meets the Secretary of the Interior’s Qualifications. The evaluation shall provide recommendations to mitigate potential impacts to historic and/or cultural resources and shall be approved by the Director of Planning and Development. During project-specific environmental review of development under the proposed plan, before altering or otherwise affecting a building or structure that is 50 years old or older, the City shall require project applicants to retain a qualified architectural historian meeting the Secretary of Interior's Professional Qualifications Standards to record the building or structure on a California Department of Parks and Recreation DPR 523 form or equivalent documentation, if the building has not previously been evaluated. Its significance shall be assessed and documented by a qualified architectural historian in accordance with the significance criteria set forth for historic resources under CEQA Guidelines Section 15064.5. The evaluation process shall include the development of appropriate historical background research as context for the assessment of the significance of the structure in the history of the City and the region. For buildings, structures, and other resources determined through this evaluation process not to meet the CEQA historical resource criteria, no further mitigation is required. For any building, structure, and or other resource that qualifies as a historic resource, the architectural historian and the future project-specific applicant shall consult to consider measures that would enable projects under the proposed plan to avoid direct or indirect impacts to the historic building or structure. These could include preserving the building on site, using it “as is,” or other measures that would not materially alter the historically significant components of the building or structure. If the project cannot feasibly avoid modifications to the historically significant features of the historic building or structure, the following measures shall be undertaken as appropriate: • If the building or structure can be preserved on-site, but remodeling, renovation or other alterations are required, this work shall be conducted in compliance with The Secretary of the Interior’s Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings (NPS 2017). • If a significant historic building or structure is proposed for major alteration or renovation, or to be moved and/or demolished, the City shall ensure that a qualified architectural historian thoroughly documents the building and associated landscaping and setting. Documentation shall include still and video photography	historical/cultural resources specialist	Department	approval of discretionary project. The City shall ensure that project-specific mitigation is incorporated into project plans prior to project approval.

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and a written documentary record of the building to the standards of the Historic American Building Survey or Historic American Engineering Record, including accurate scaled mapping, architectural descriptions, and scaled architectural plans, if available. A copy of the record shall be provided to the City. The record shall be accompanied by a report containing site-specific history and appropriate contextual information. This information shall be gathered through site specific and comparative archival research, and oral history collection as appropriate. If preservation and reuse at the site are not feasible, the historical building shall be documented as described in item (2) and, when physically and financially feasible, be moved and preserved or reused.			
CL-2: Subsequent to a preliminary City review of grading plans for future development projects facilitated by the Specific Plan Update, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for prehistoric archaeological resources shall be conducted. The following procedures shall be followed. If prehistoric resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that buried prehistoric archaeological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified archaeologist shall be consulted to determine whether the resource requires further study. The qualified archaeologist shall make recommendations to the City of Fresno on the measures that shall be implemented to protect the discovered resources, including but not limited to excavation of the finds and evaluation of the finds in accordance with Section 15064.5 of the <i>State CEQA Guidelines</i>. If the resources are determined to be unique prehistoric archaeological resources as defined under Section 15064.5 of the <i>State CEQA Guidelines</i>, mitigation measures shall be identified by the monitor and recommended to the City of Fresno. Appropriate measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any prehistoric archaeological artifacts recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study.	Project Applicant and qualified archaeologist	Planning and Development Department	Cultural resources study to be completed during environmental review and prior to approval of discretionary project. The City shall ensure that project-specific mitigation is incorporated into project plans prior to project approval.

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If prehistoric resources are found during the field survey or literature review, the resources shall be inventoried using appropriate State record forms and submit the forms to the Southern San Joaquin Valley Information Center. The resources shall be evaluated for significance. If the resources are found to be significant, measures shall be identified by the qualified archaeologist. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include an archaeological monitor. The monitoring period shall be determined by the qualified archaeologist. If additional prehistoric archaeological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.			
CUL-3: In the event that human remains are unearthed during excavation and grading activities of any future development project, all activity shall cease immediately. Pursuant to Health and Safety Code (HSC) Section 7050.5, no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code (PRC) Section 5097.98(a). If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendent of the deceased Native American, who shall then serve as the consultant on how to proceed with the remains. Pursuant to PRC Section 5097.98(b), upon the discovery of Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located is not damaged or disturbed by further development activity until the landowner has discussed and conferred with the MLDs regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.	Project Applicant and qualified historical/cultural resources specialist	Planning and Development Department	Planning and Development Department to review construction specifications to ensure inclusion of provisions included in mitigation measure.
GEOLOGY AND SOILS			
GEO-1: Paleontological/Geologic Features. Subsequent to a preliminary City of Fresno review of the project grading plans, if there is evidence that a project will include excavation or construction activities within previously undisturbed soils, a field survey and literature search for unique	Project Applicant and qualified paleontologist	Planning and Development Department	City shall review preliminary grading plans prior to issuance of grading permits. If needed, a field survey or literature review shall occur prior to start

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paleontological/geological resources shall be conducted. The following procedures shall be followed: • If unique paleontological/geological resources are not found during either the field survey or literature search, excavation and/or construction activities can commence. In the event that unique paleontological/geological resources are discovered during excavation and/or construction activities, construction shall stop in the immediate vicinity of the find and a qualified paleontologist shall be consulted to determine whether the resource requires further study. The qualified paleontologist shall make recommendations to the City on the measures that shall be implemented to protect the discovered resources, including but not limited to, excavation of the finds and evaluation of the finds. If the resources are determined to be significant, mitigation measures shall be identified by the monitor and recommended to the Lead Agency. Appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. No further grading shall occur in the area of the discovery until the Lead Agency approves the measures to protect these resources. Any paleontological/geological resources recovered as a result of mitigation shall be provided to a City-approved institution or person who is capable of providing long-term preservation to allow future scientific study. • If unique paleontological/geological resources are found during the field survey or literature review, the resources shall be inventoried and evaluated for significance. If the resources are found to be significant, mitigation measures shall be identified by the qualified paleontologist. Similar to above, appropriate mitigation measures for significant resources could include avoidance or capping, incorporation of the site in green space, parks, or open space, or data recovery excavations of the finds. In addition, appropriate mitigation for excavation and construction activities in the vicinity of the resources found during the field survey or literature review shall include a paleontological monitor. The monitoring period shall be determined by the qualified paleontologist. If additional paleontological/geological resources are found during excavation and/or construction activities, the procedure identified above for the discovery of unknown resources shall be followed.			of grading activities. Additional monitoring of project site during construction period shall be determined by a qualified paleontologist and consistent with project-specific mitigation measure.

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GREENHOUSE GAS EMISSIONS			
GHG-1: Prior to discretionary approval by the City of Fresno (City) for development projects subject to California Environmental Quality Act (CEQA) review (i.e., nonexempt projects), Project applicants shall prepare and submit a technical assessment evaluating potential project-related greenhouse gas (GHG) impacts to the City for review and approval. The evaluation shall be prepared in conformance with San Joaquin Valley Air Pollution Control District (SJVAPCD) methodology. While neither the City nor the SJVAPCD currently have established threshold of significance for evaluating the GHG emissions impact of a proposed project, if either the City or the SJVAPCD develop GHG thresholds in the future (i.e. CEQA qualified Greenhouse Gas Reduction Plan/Climate Action Plan or SJVAPCD project-specific GHG thresholds), the evaluation of project-related GHG emissions shall demonstrate consistency with those thresholds of significance. In the absence of project-specific GHG thresholds established by the City or SJVAPCD, projects shall demonstrate compliance with the 2022 Scoping Plan GHG requirements, consistent with State GHG emissions reduction and equity prioritization goals, by implementing the following design elements, where feasible: • Projects shall not include natural gas appliances or natural gas plumbing. • Projects shall achieve a reduction in project-generated VMT below the regional average consistent with the current version of the 2022 Scoping Plan (currently 15 percent) or meets the City’s locally adopted target reduction (13 percent reduction). • Projects shall not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the <i>State CEQA Guidelines</i>. • Projects must achieve compliance with EV requirements in the most recently adopted version of CALGreen Tier 2. Should a proposed project exceed established thresholds of significance, the City shall require that the proposed project implement GHG emission reduction measures to reduce emissions below applicable thresholds or to a level commensurate with implementing the recommended project-design features outlined above. Such mitigation measures could include, but are not limited to, energy efficiency measures, water conservation and efficiency measures, solid waste measures, and transportation and motor vehicles measures. The identified measures shall be included as part of the conditions of approval.	Project Applicant	Planning and Development Department	Planning and Development Department shall review project plans during environmental review of proposed project, and shall review construction specifications to ensure inclusion of applicable measures.

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NOISE			
NOI-1a: Prior to future discretionary approval for projects that require environmental evaluation under CEQA (i.e. non-exempt projects), and prior to the issuance of demolition, grading, and/or construction permits, the construction contractor shall conduct a project-level construction noise analysis to evaluate potential impacts on off-site sensitive land uses adjacent to the project site. The project-level construction noise analysis shall be prepared, reviewed, and approved by the City of Fresno Community Development Director. Measures shall be implemented to reduce construction noise to the Federal Transit Administration (FTA) construction noise criteria or below if construction noise impacts are identified. Measures may include, but are not limited to the installation of temporary construction barriers.	Project Applicant and construction contractor	Planning and Development Department	Prior to issuance of any grading or construction permits, the construction contractor shall include specifications for the installation of a minimum 10-foot-high temporary construction noise barrier along the project boundary, if necessary, to meet FTA daytime noise standards. Barriers shall be continuous with no gaps and made of materials with a minimum STC rating.
NOI-1b: Prior to future discretionary approval for projects that require environmental evaluation under CEQA (i.e. non-exempt projects), a project-specific noise study shall be prepared by a qualified acoustical consultant to determine the noise levels generated from long-term operations of future projects associated with implementation of the Tower District Specific Plan Update, and measures will be included as necessary to reduce noise levels and ensure compliance with the City of Fresno's stationary noise standards. The project specific noise study will be submitted to the city for review and approval. Noise reduction measures may include, but are not limited to, locating stationary noise sources on the site to be shielded by structures (buildings, enclosures, or soundwalls) or by using equipment that has a quieter rating.	Project Applicant and acoustical consultant	Planning and Development Department	A project-specific noise study shall be prepared by a qualified acoustical consultant to evaluate operational noise levels and identify necessary measures to ensure compliance with the City's stationary noise standards. The noise study shall be submitted to the City for review and approval.
NOI-2: Future development would require that the construction contractor for the project shall restrict heavy construction (e.g., large bulldozers) or require the use of light construction equipment (e.g., small bulldozers and trucks) within 10 feet of a historic building, 9 feet of an older residential structure, or 6 feet of a new residential or modern industrial/commercial building, to be confirmed by the City of Fresno or lead agency.	Project Applicant and construction contractor	Planning and Development Department	Prior to issuance of any grading or construction permits, construction plans shall include restrictions on heavy construction equipment within proximity to existing structures. Specifically, heavy construction shall be restricted or replaced with light equipment. Distances shall be confirmed by the City or lead agency during plan review.
RECREATION			
REC-1a: As new development occurs in the Specific Plan Area, the City of Fresno (City) shall periodically (every 5 years) monitor residential population growth compared to development of new parklands for the purpose of evaluating the strength of the	Planning and Development Department	Planning and Development Department	The City shall monitor residential population growth and parkland development within the Specific Plan

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Tower District Specific Plan Update to meet the ratio of 3.0 acres of parkland per 1,000 population. If the ratio is not met, the City shall explore additional ways to increase the amount of dedicated parkland in the Specific Plan Area, including but not limited to designating additional lands for parkland development.			Area at five-year intervals following the adoption of the Specific Plan Update. The evaluation shall assess whether the parkland-to-population ratio is being improved or maintained. If the ratio is not achieved, the City shall identify and consider options to increase dedicated parkland.
REC-1b: As future parks and recreational facilities are planned, the City shall evaluate if specific environmental effects would occur. Typical impacts from construction and operation of parks and recreational facilities include air quality/greenhouse gas emissions, noise, traffic, and lighting. Typical mitigation to reduce potential impacts includes: ● Air Quality/Greenhouse Gas Emissions: Install solar panels, zero-emission backup electricity generators, and energy storage to minimize emissions associated with electricity. ● Noise: Barriers and setbacks placed on parks and recreational facilities. ● Traffic: Traffic devices for circulation. ● Lighting: Provision of hoods and deflectors on lighting fixtures for stadium lights.	Planning and Development Department	Planning and Development Department	The City shall evaluate project-specific environmental impacts during environmental review, including air quality/greenhouse gas emissions, noise, traffic, and lighting. If significant impacts are identified, appropriate mitigation measures shall be incorporated into project design. The City shall ensure that project-specific mitigation is incorporated into project plans prior to project approval.

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