Mitigation Monitoring and Reporting Program

Introduction

This document is the Mitigation Monitoring and Reporting Program (MMRP) for the California State University, Channel Islands (CSUCI) Specific Reuse Plan Amendment and Phase 2 Development of the East Campus Residential Neighborhood Project, at the California State University, Channel Islands Campus in southern Ventura County, California. Public Resources Code Section 21081.6(a) requires that a Lead Agency adopt an MMRP before approving a project in order to mitigate or avoid significant impacts that have been identified in an Environmental Impact Report. The purpose of the MMRP is to ensure that the required mitigation measures identified in the Environmental Impact Report are implemented as part of overall project implementation. In addition to ensuring implementation of mitigation measures, the MMRP provides feedback to agency staff and decision-makers during project implementation, and identifies the need for enforcement action before irreversible environmental damage occurs.

The following table summarizes the mitigation measures for each issue area identified in the Environmental Impact Report (EIR) for the CSUCI Specific Reuse Plan Amendment and Phase 2 Development of the East Campus Residential Neighborhood Project. The table identifies each mitigation measure; the action required for the measure to be implemented; the time at which the monitoring is to occur; the monitoring frequency; and the agency or party responsible for ensuring that the monitoring is performed. In addition, the table includes columns for compliance verification. Where an impact was identified to be less than significant, no mitigation measures were required.

CSUCI Specific Reuse Plan Update EIR

Construction and operation of the project covered under this EIR may require plan check(s) for ADA compliance by the Office of the State Architect; National Pollutant Discharge Elimination System (NPDES) permits from the Regional Water Quality Control Board; and permits from the California Department of Fish and Wildlife, U.S. Army Corps of Engineers and Regional Water Quality Control Board for impacts to jurisdictional waters.

The mitigation measures contained herein shall be included as conditions of approval for the project, to the extent permitted by law. The California State University shall ensure that all construction plans and project operations conform to the conditions of the mitigated project. Table 1 shall be attached to all approvals/permits as a condition of approval.

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AIR QUALITY								
AQ-1: Operation of the proposed project would generate maximum daily NO_x emissions slightly above the VCAPCD significance threshold of 25 pounds per day. Maximum daily emissions of other criteria pollutants would be below significance thresholds with mitigation, air quality impacts would be less than significant.	**AQ-1: Operational NO_x Emissions.** The proposed project shall incorporate the following measures to reduce NO_x emissions to a less than significant level: • All landscape maintenance equipment shall be electric. This would achieve a reduction of 0.12 pounds of NO_x per day. • No fireplaces (wood or gas) shall be included in the proposed project. This would achieve a reduction of 0.9 pounds of NO_x per day. If the above mitigation options are not preferable, the project applicant shall propose alternative mitigation options and submit proof to the lead agency that emissions would be reduced to below daily threshold levels through these measures prior to commencement of ground disturbing activities. The lead agency shall verify compliance during operation.	1. If alternative mitigation is proposed, verify that the mitigation would reduce emissions below daily threshold levels. Verify that the mitigation proposed is incorporated into the project.	1. California State University Trustees	1. Prior to construction of the project.	1. Once			
		2. Verify that the mitigation proposed is incorporated into the project.	2. California State University Trustees	2. During operation of the project.	2. Once, after the construction of the first phase of the project.			
AQ-2: The VCAPCD does not recommend any thresholds of significance for construction emissions. Therefore, significance is determined based on the control measures to be implemented.	**AQ-2 (A) Construction Fugitive Dust Emissions.** The following mitigation measures shall be incorporated to reduce construction emissions of fugitive dust (based on the Ventura County Air Quality Assessment Guidelines, Section 7.4.1). • The area disturbed by clearing, grading, earth moving, or	1. Verify that mitigation measures are included on grading plans and building permits.	1. California State University Trustees	1. Prior to construction of the project.	1. Once, prior to each phase of construction			
		2. Field verify compliance.	2. California State University Trustees	2. During construction of the project.	2. Periodically			

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Incorporation of control measures would reduce construction air quality impacts to less than significant levels.	excavation operations shall be implemented in a manner to prevent excessive amounts of dust. • Pre-grading/excavation activities shall include watering the area to be graded or excavated before commencement of grading or excavation operations. Application of water (preferably recycled, if available) should penetrate sufficiently to minimize fugitive dust during grading activities. • All trucks shall be required to cover their loads as required by California Vehicle Code §23114. • All graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways, shall be watered periodically to reduce fugitive dust. Watering shall be done as often as necessary and recycled water shall be used whenever practicable. • Graded and/or excavated inactive areas of the construction site shall be monitored at least weekly for dust stabilization. Soil stabilization methods, such as							

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	water and roll-compaction, and environmentally-safe dust control materials, shall be periodically applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area should be seeded and watered until grass growth is evident, or periodically treated with environmentally-safe dust suppressants, to prevent excessive fugitive dust. • Signs shall be posted on-site limiting traffic to 15 miles per hour or less. • During periods of high winds, all clearing, grading, earth moving, and excavation operations shall be curtailed to the degree necessary to minimize fugitive dust created by on-site activities and operations from being a nuisance or hazard, either off-site or on-site. The site superintendent/supervisor shall use his/her discretion in determining when winds are excessive. • Adjacent streets and roads shall be swept at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets							

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	and roads. • Personnel involved in grading operations, including contractors and subcontractors, should be advised to wear respiratory protection in accordance with California Division of Occupational Safety and Health regulations.							
See Impact **AQ-2**.	**AQ-2 (B) Construction ROC and NO_x Emissions.** The following mitigation measures shall be incorporated to reduce ROC and NO_x emissions during construction (based on the Ventura County Air Quality Assessment Guidelines, Section 7.4.3). • Minimize equipment idling time. • Maintain equipment engines in good condition and in proper tune as per manufacturers' specifications. • Minimize the number of vehicles and equipment operating at the same time during the smog season (May through October), to the extent practicable. • Use alternatively fueled construction equipment, such as compressed natural gas (CNG), liquefied natural gas (LNG), or electric, to the extent	1. Verify that mitigation measures are included on grading plans and building permits.	1. California State University Trustees	1. Prior to construction of the project.	1. Once, prior to each phase of construction			
		2. Field verify compliance.	2. California State University Trustees	2. During construction of the project.	2 Periodically			

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	practicable.							
AQ-6: The majority of the project site contains disturbed soil that is unlikely to harbor the Coccidioides immitis spores that cause valley fever infections. However, there remains a low potential for the presence of Coccidioides immitis spores in previously undisturbed areas of the project site. Valley Fever mitigation measures recommended by the VCAPCD would be implemented during construction activities on areas of the site with potential for presence of Coccidioides immitis spores to reduce potential impacts to a less than significant level.	**AQ-6 Valley Fever.** The following mitigation measures shall be implemented, as practicable, during ground disturbing activities in previously undisturbed areas of the project site determined to have potential for presence of Valley Fever causing spores, as recommended in the Ventura County Air Quality Assessment Guidelines, Section 7.4.2. • Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. Prior to the start of ground disturbing activities, the applicant shall submit a grading plan to the University, which indicates the areas of the site that are previously undisturbed where Valley Fever mitigation measures will be implemented.	1. Developer to submit a grading plan that indicates the areas of the project site that are previously undisturbed.	1. California State University Trustees	1. Prior to approval of grading plans.	1. Once			
		2. Field verify compliance.	2. California State University Trustees	2. During project clearing, grading and excavation activities on previously undisturbed areas of the site.	2. Periodically			
BIOLOGICAL RESOUCES								
BIO-1: Construction of the project could have a substantial adverse effect on nesting birds. Mitigation measures to reduce potential impacts would be required,	**BIO-1 (A) Nesting birds.** The following mitigation measure, in compliance with the Migratory Bird Treaty Act and California Fish and Game Code requirements, is required to reduce potentially	1. If initial ground disturbing activities occur during the breeding bird nesting season, verify that a qualified biologist has performed a	1. California State University Trustees	1. No more than seven days prior to ground disturbance and vegetation removal activities.	1. Once, prior to each phase of construction			

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including timing restrictions and avoidance buffers. Impacts would be less than significant with mitigation incorporated.	significant impacts to nesting birds. To avoid disturbance of nesting and special-status birds, including raptorial species protected by the MBTA and California Fish and Game Code, activities related to construction of the proposed project, including, but not limited to vegetation removal, ground disturbance, and construction and demolition, should occur outside of the nesting season (February 1 through September 15). If construction activities must occur during the nesting season, a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of ground disturbance and vegetation removal activities. The survey shall be conducted on foot and visually assess the entire project site, including a 300-foot line-of-site buffer (500-foot for raptors and listed species, e.g. California Gnatcatcher) using binoculars to the extent practical. The survey shall be conducted by a qualified biologist familiar with the identification of avian species known to occur in southern California coastal communities. If active nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances	nesting bird survey. 2. If active bird nests are located during the pre-construction survey, field verify buffer zones are in place and are enforced.	2. California State University Trustees	2. During construction of the project.	2. Periodically			

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	associated with land uses outside of the site) shall be determined and demarcated by the biologist using bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and instructed to avoid entering the buffer zone during the nesting season. No construction activities shall occur within this buffer until the biologist has confirmed that breeding / nesting is completed and the young have fledged. Encroachment into the buffer shall occur only at the discretion of the qualified biologist. In the event a coastal California gnatcatcher, or other listed species, is observed nesting within the 500-foot survey buffer during the survey, no construction activities shall occur until the project proponent has consulted with USFWS and/or CDFW, as appropriate, for additional guidance regarding take avoidance.							
See Impact **BIO-1**.	**BIO-1 (B) Special Status Plant Surveys.** To avoid impacts to special status plants within the fuel modification area, surveys for special status plants shall be completed prior to any vegetation removal, grubbing, or other construction activity within this area. The surveys shall be floristic in	1. Verify that a qualified biologist has conducted pre-construction surveys for special-status plant species within the fuel modification zone at a seasonally-timed blooming	1. California State University Trustees	1. Prior to vegetation removal, grubbing or other construction activity in the fuel modification zone.	1. Each time activity in the fuel modification area is required			

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	nature, seasonally-timed to coincide with the blooming period of the target species identified in this EIR as having a potential to occur, and be conducted by a qualified biologist. All special status plant species identified on-site shall be mapped onto a site-specific aerial photograph and topographic map. Surveys shall be conducted in accordance with the most current protocols established by the CDFW, USFWS, and the local jurisdictions, if any such protocols exist. A report of the survey results shall be submitted to the implementing agency for review and approval.	period of targeted species identified in the EIR.						
		2. Verify that all special status plant species identified are mapped in accordance with established guidelines.	2. California State University Trustees	2. Prior to vegetation removal, grubbing or other construction activity.	2. Each time activity in the fuel modification area is required			
See Impact **BIO-1**.	**BIO-1 (C) Special Status Plant Avoidance Measures.** Any State listed or California Rare Plant List 1B species found during special status plant surveys [pursuant to mitigation measure BIO-1(B)] shall be avoided, and any vegetation clearing within 50 feet of any identified rare plant will be conducted by hand, if practicable. Any rare plant occurrences shall have bright orange protective fencing installed at least 50 feet beyond their extent, or other distance as approved by a qualified biologist, to protect them from harm.	1. Verify that the Special Status Plant Species Avoidance Measures are implemented, as required based on the findings of the rare plant surveys.	1. California State University Trustees	1. Prior to vegetation removal, grubbing or other construction activity.	1. Each time activity in the fuel modification area is required			
		2. Field verify during construction to ensure avoidance measures remain in place.	2. California State University Trustees	2. During construction of the proposed project.	2. Periodically			
See Impact **BIO-1**.	**BIO-1 (D) Restoration Plan.** If special status plants species cannot be	1. If avoidance is not feasible, verify that a	1. California State	1. Prior to construction of	1. Each time activity in the			

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	avoided and will be impacted by the project, all impacts shall be mitigated at a minimum ratio of 2:1 (number of acres/individuals restored to number of acres/individuals impacted) for each species as a component of habitat restoration, including but not limited to transplantation and habitat restoration. A restoration plan shall be prepared and submitted to CDFW and/or USFWS, as appropriate, for approval (e.g., if a state listed plant species will be impacted, the restoration plan shall be submitted to the CDFW for approval).	restoration plan has been prepared by a qualified biologist/ restoration ecologist which includes the required components.	University Trustees	the project.	fuel modification area is required			
		2. Verify that the restoration plan has been completed.	2. California State University Trustees	2. Prior to start of construction.	2. Once			
		3. Verify that habitat restoration plan has been implemented.	3. California State University Trustees	3. At completion of construction and prior to occupancy.	3. Once			
BIO-2: The proposed project would result in a substantial adverse effect on jurisdictional wetlands and waters. Compensatory mitigation acreage is available under the campus habitat restoration program to replace impacted acreage. Impacts would be less than significant with mitigation incorporated.	**BIO-2 (A) Avoidance and Minimization.** Potential jurisdictional areas (ephemeral drainages) shall be avoided to the extent practical. Any material/spoils generated from project activities shall be located away from jurisdictional areas and protected from stormwater run-off using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate. Materials shall be stored on impervious surfaces or plastic ground covers to prevent any spills or leakage from contaminating the ground and generally at least 50 feet from the top of bank. Any spillage of material will be stopped if	1. Field verify that any material generated from the project activities is located away from jurisdictional areas, protected from stormwater runoff, and stored on impervious surfaces.	1. California State University Trustees	1. During construction of the project.	1. Periodically			
		2. Field verify that any spills are cleaned and that required notification is occurring.	2. California State University Trustees	2. During construction of the project.	2. Periodically			

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	it can be done safely. The contaminated area will be cleaned and any contaminated materials properly disposed. For all spills, the project foreman will be notified.							
See Impact **BIO-2**.	**BIO-2 (B) Compensatory Mitigation.** Prior to ground disturbance activities that will impact waters and wetlands of the U.S. and/or State, the project proponent shall consult with USACE on the need for a Clean Water Act Section 404 permit, the RWQCB regarding compliance with Section 401 of the Clean Water Act, and CDFW on the need for a Streambed Alteration Agreement. Based on consultation with the agencies, if permits are required for the project, appropriate permits shall be obtained prior to disturbance of jurisdictional resources. To provide compensatory mitigation for impacts associated with replacement of the culvert, permanent impacts will be mitigated at a minimum 1:1 ratio, and subtracted from the excess acreage of the campus mitigation program. Temporary impact areas adjacent to the new Inspiration Bridge culvert, and temporary impacts associated with modification of the constructed wetlands outlet will be re-vegetated consistent with the requirements of the existing Habitat Mitigation and Monitoring Plan (HMMP; Rincon	1. Verify consultation with USACE, RWQCB, and CDFW has been completed.	1. California State University Trustees	1. Prior to construction of the proposed project.	1. Once			
		2. Verify permits have been obtained, if required.	2. California State University Trustees	2. Prior to construction of the proposed project.	2. Once			
		3. Field verify revegetation of temporary impact areas.	3. California State University Trustees	3. At completion of construction and prior to occupancy	3. Once			

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	Consultants, Inc. 2002) and HMMP Update (Rincon Consultants, Inc. 2009). Further information regarding the HMMP is provided in the Regulatory Due Diligence and Mitigation Planning Memorandum (Rincon Consultants, Inc. 2012).							
GEOLOGY AND SOILS								
From Section 6 of the Initial Study (see Appendix A) **Threshold (a)(4)** Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?	**GEO-1 Incorporate recommendations of Geotechnical Study: Cal State University Channel Islands East Campus Development (Site Authority 2000).** Recommendations presented in the Geotechnical Study shall be incorporated at the project site. These recommendations include site preparation, excavation considerations, slope construction, subgrade stabilization measures, fill selection and compaction, shrinking and subsidence, shallow foundation design, retaining walls, bridge drilled pier foundation, utility trenching, pipe bedding, trench backfill, and pavements. A more detailed explanation of each recommendation is provided in the Geotechnical Report (Appendix A of the Initial Study for the proposed project).	1. Verify recommendations are included in the project grading/building plans.	1. California State University Trustees	1. Prior to start of grading.	Once			

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See threshold (a)(4)	**GEO-2 Update Geotechnical Study, as needed.** The applicability of the existing Geotechnical Study and Addendum for current site conditions and construction/ grading plan will be assessed by a geotechnical consultant. If recommendations in the existing Geotechnical Study and Addendum are no longer applicable to existing conditions, updates and/or a new geotechnical study will be required. Recommendations resulting from the new study shall be incorporated into the proposed project to mitigate geological hazards to a less than significant level.	1. Verify updated study complete.	1. California State University Trustees	1. Prior to issuance of grading permits.	Once			
Threshold (c): Would the project be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	**GEO-3 Incorporate recommendations of 2007 Geotechnical Study Addendum.** The proposed project shall incorporate the recommendations presented in the Geotechnical Study Addendum (Appendix A of the Initial Study for the proposed project), including, but not limited to observations during demolition, excavation and the use of appropriate backfill material, to mitigate geological hazards to a less than significant level.	1. Verify recommendations are included in the project grading/building plans.	1. California State University Trustees	1. Prior to issuance of grading permits.	Once			
HYDROLOGY AND WATER QUALITY								
HWQ-1: The proposed project would increase	**HWQ-1 Modification of the Rectangular Orifice Outlet from the**	1. Verify required modification to the	1. California State	1. Prior to issuance of	1. Once			

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peak discharge from 12.5 cfs, in the existing condition, to 22.5 cfs at the existing construction wetlands during a 100-year storm event. The increase in peak flows from the proposed project would exceed existing condition flows resulting in a significant impact. Improvements to the outlet at the constructed wetland would reduce flows to equal the existing condition. Impacts regarding drainage patterns and flooding would be less than significant with mitigation incorporated.	**Constructed Wetlands.** In accordance with the provisions of the *Hydrology, Hydraulics, and Water Quality Report for University Glen Phase 2 at CSU Channel Islands* (Huitt-Zollars, Inc., 2017), the existing outlet from the constructed wetlands will be modified to ensure the proposed peak discharges are equal to or less than those under the existing condition, for the 10-, 25-, 50-, and 100-year storm events. As such, the existing culvert opening will be reduced in size from 10.3 feet wide x 2.8 feet high to 5.0 feet wide x 2.8 feet high, in order to achieve a discharge of 12.5 cubic feet per second during the 100-year storm scenario. These modifications are required to occur prior to occupancy of the first phase of the proposed project, in order to ensure that no phase of the project results in discharges exceeding current conditions.	outlet is in the project building plans.	University Trustees	building permits.				
		2. Field verify completion of modifications.	2. California State University Trustees	2. Prior to occupancy of the first phase of the project.	2. Once			
NOISE								
N-1: Noise from construction of the proposed project has the potential to expose nearby sensitive receptors to construction noise for a period longer than eight weeks. This impact would be less than significant with	**N-1 (A) Construction Activity Timing and Disclosure.** Construction activity shall be restricted to weekdays (Monday through Friday) between 7:00 AM and 7:00 PM, and on Saturday between 9:00 AM and 5:00 PM. No construction activity will be allowed on Sundays and local holidays. Loud activities should be scheduled between 8:00 AM and 5:00 PM, to the extent practicable,	1. Verify notice to University Glen residences has been sent.	1. California State University Trustees	1. Three weeks prior to construction.	1. Once, prior to each phase of construction			
		2. Verify signs have been posted.	2. California State University Trustees	2. Prior to start of construction of activities.	2. Once, prior to each phase of construction			
		3. Field verify compliance with	3. California State	3. During construction	3. Ongoing			

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mitigation incorporated.	to avoid disturbance of the adjacent neighborhood during evening hours. Quiet activities (such as interior work after a building is enclosed and certain exterior activities) may be granted extended hours on request subject to acceptance by campus staff. Information stating the restrictions regarding the hours of construction shall be provided to nearby residents by the applicant and shall be posted on-site. Signs shall be placed prior to commencement of, and throughout, grading and construction activities. All residences within the University Glen community will be notified, via mail or email, regarding the estimated timeline of all of the phases of the proposed project and the hours that construction activity can be performed. This notice will be sent two weeks prior to initial commencement of construction activity.	timing restrictions.	University Trustees	activities.				
See Impact **N-1**.	**N-1 (B) Vehicle and Equipment Idling.** Construction vehicles and equipment shall not be left idling for longer than five minutes when not in use.	Field verify compliance.	California State University Trustees	During construction activities.	Periodically			
See Impact **N-1**.	**N-1 (C) Sound Control Curtains.** Flexible sound control curtains shall be placed around all stationary equipment and jackhammers when in use, and shall be oriented to break	1. Verify designation of sound control curtains on building and grading plans.	1. California State University Trustees	1. Prior to issuance of grading permits.	1. Once, prior to each phase of construction			
		2. Field verify	2. California	2. During	2. Periodically			

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	line-of-sight between operating equipment and all visible residential receptors within line-of-sight of the equipment. The equipment area with appropriate sound control curtains shall be designated on building and grading plans. Equipment and shielding shall remain in the designated location until specified stationary equipment and jackhammers are no longer in use.	compliance.	State University Trustees	construction activities.				
TRAFFIC AND CIRCULATION								
T-4: Analysis of two intersections under Caltrans jurisdiction indicates that Caltrans thresholds would be exceeded under Existing (Year 2016) plus Project conditions at the intersection of U.S. 101 Southbound ramps/Ventura Boulevard as a result of proposed project traffic. Impacts would be less than significant with mitigation incorporated (Threshold 1).	**T-4 Signal Timing.** The applicant shall request that Caltrans optimize cycle length and signal timing splits for the intersection of U.S. 101 Southbound Ramps & Ventura Boulevard. If required, the applicant shall pay a fair share proportion of the cost to implement this mitigation measure. The optimization to cycle length and signal timing shall be completed prior to occupancy of the first phase of residential construction.	1. Verify the change in cycle length and signal timing is complete.	1. California State University Trustees	1. Prior to occupancy of the first phase of the project.	1. Once			
T-9: Previous concerns regarding emergency access have been raised as a result of the Springs Fire, the increase in	**T-9 (A) Adopt and Emergency Evacuation Plan for the University Glen Community.** The CSUCI Site Authority, in consultation with the University Glen community,	Verify adoption of an Emergency Evacuation Plan.	California State University Trustees	Prior to occupancy of the first phase of the project.	Once			

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population at the project site and the overall population increase in University Glen neighborhood. The roadways within the project site and throughout the University Glen community would comply with Ventura County Fire Code and would not result in inadequate emergency access to the area. However, in consideration of residents' concerns, mitigation measures are recommended to further reduce this already less than significant impact.	University Police Department, and the applicant, should prepare and adopt an Emergency Evacuation Plan prior to occupancy of the proposed project.							
See Impact **T-9**.	**T-9 (B) Conduct Emergency Evacuation Drills.** In addition to the drafting and adoption of the Emergency Evacuation Plan, a limited emergency evacuation drill for the University Glen community should be conducted on a regular basis with the required timing to be determined by the University Police Department.	Verify emergency evacuation drill are conducted.	California State University Trustees	During operation of the project.	Periodically			
TRIBAL CULTURAL RESOURCES								
TCR-1: Construction of	**TCR-1 Interpretive Signage.**	1. Verify consultation	1. California	1. Prior to	1. Once			

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the proposed project would result in increased pedestrian activity in the vicinity of the proposed project, which has the potential to indirectly impact Round Mountain. Impacts would be less than significant with mitigation incorporated (Threshold 1).	Interpretive signage shall be installed near the perimeter of the project site where it intersects with offsite trails and/or open space to inform people to stay on the walking trails, and to educate and inform the public on the sensitivity and sacredness of the project site and the general vicinity to the Chumash people, the importance of leaving plants and animals in place, and of the potential to damage to cultural and natural resources by leaving the trail. The signage shall be written and designed in consultation with a Chumash tribal representative. The signage shall be installed as part of the proposed project.	with Chumash tribal representative(s) occurred.	State University, Channel Islands Site Authority	occupancy of the first phase of the project.				
		2. Field verify that the agreed upon signage is installed.	2. California State University, Channel Islands Site Authority	2. Prior to occupancy of the first phase of the project.	2. Once			
TCR-2: Construction of the proposed project would involve ground disturbance, which has the potential to unearth or adversely impact previously unidentified tribal cultural resources. Impacts would be less than significant with mitigation incorporated (Threshold 1).	**TCR-2 (A) Tribal Cultural Resource Worker Environmental Awareness Program.** Prior to the commencement of construction activities a qualified archaeologist and Chumash tribal representative shall provide a Worker Environmental Awareness Program (WEAP) for the general contractor, subcontractor(s), and all construction workers participating in earth disturbing activities. The WEAP training shall describe the sensitivity and sacredness of the area, the potential of exposing Native American cultural materials, the types of materials that may be encountered, and directions on the	Verify a WEAP program has been prepared and training has been conducted.	California State University Trustees	Prior to start of construction activities.	Once, prior to each phase of construction			

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	steps that shall be taken if such a find is encountered. This training may be presented alongside other environmental training programs required prior to construction. A WEAP acknowledgement form must be signed by all workers who receive the training.							
See Impact **TCR-2**.	**TCR-2 (B) Archaeological and Native American Monitoring.** Any project-related ground disturbing activities taking place within native soils, including but not limited to depths that exceed previous grading/site disturbance areas, shall be observed by a qualified archaeologist, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology. If unanticipated cultural deposits are encountered, work shall stop and the California State University, Board of Trustees shall be notified. The qualified archaeologist shall assess the nature, extent, and potential significance of any cultural remains. If the resources are determined to be Native American in origin, the archaeologist shall consult with the California State University, Board of Trustees to begin Native American consultation procedures, as appropriate. If the discovery is determined to be not significant, work would be permitted to	1. Field verify a qualified archeologist is to be on site during ground disturbing activities in the specified areas.	1. California State University Trustees	1. During ground-disturbing activities.	1. Periodically			
		2. If unanticipated cultural deposits are encountered, assess the nature of the find. If the find is of Native American origin, start consultation.	2. California State University Trustees	2. As needed, if remains of Native American origin are encountered.	2. As needed			
		3. If unanticipated cultural deposits are encountered, assess the nature of the find. If the find is a potentially significant resource and cannot be avoided, carry out a Phase II subsurface testing program or other approved mitigation plan.	3. California State University Trustees	3. As needed, if unanticipated cultural deposits are encountered.	3. As needed			

Table 1 Mitigation Monitoring and Reporting Program

Impact	Mitigation Measure	Action	Responsible Agency or Party	When Monitoring to Occur	Monitoring Frequency	Compliance Verification		
						Initial	Date	Comments
	continue in the area. Potentially significant resources may require a Phase II subsurface testing program to determine the resource boundaries within the project site, assess the integrity of the resource, and evaluate the site's significance through a study of its features and artifacts. If, in consultation with the California State University, Board of Trustees, a discovery is determined to be significant, a mitigation plan would be prepared and carried out in accordance with State guidelines. If the resource cannot be avoided, a data recovery plan would be developed to ensure collection of sufficient information to address archaeological and historical research questions, with results presented in a technical report describing field methods, materials collected, and conclusions. Any cultural material collected as part of an assessment or data recovery effort would be property of the University and curated at a qualified facility as directed by the University.							