

Mitigation Monitoring & Reporting Program
California State University, Sacramento
South Campus Student Housing Mitigated Negative Declaration & Initial Study
SCH# 201802052, October 2018

I. Introduction

The Mitigation Monitoring and Reporting Program (MMRP) has been prepared in conformance with the California Environmental Quality Act (CEQA) Guidelines, specifically Public Resources Code Sections 21081.6 & 15097. The MMRP organizes the mitigation measures adopted per approval of the project to develop the South Campus Student Housing facilities (“project”) into a framework for implementation.

This MMRP provides the adopted mitigation measures with additional detail concerning the implementation of measures, including:

- Documentation expectations
- Responsibilities for monitoring and reporting
- Frequency and duration to implement mitigation
- How to provide records for monitoring and reporting
- How to ensure compliance with mitigation measures

The following table lists each mitigation measure adopted with project approvals.

Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
Biological Resources					
Bio-1	To the extent feasible, demolition activities, including tree removal shall avoid the nesting season (between March 1 and August 1). If demolition and removal activities must occur during the nesting season, the project area shall be surveyed by a qualified biologist to verify the presence or absence of nesting birds or raptors. If the survey indicates the potential presence of nesting birds or raptors, the results shall be coordinated with the California Department of Fish and Wildlife (CDFW) and suitable avoidance measures shall be developed and implemented. Demolition shall observe the CDFW avoidance guidelines, which require buffer zones around active raptor nests and nests of other birds, as specified by the CDFW. Buffer zones shall remain until young have fledged. If it appears that demolition activities may cause nest abandonment, demolition activities must cease until the young are able to fly well enough to avoid demolition areas.	Pre-construction	Project Biologist (Project's Environmental Team)	Report survey results to CDFW immediately upon completion if demolition is scheduled to occur.	Submit survey reports, coordinate with CDFW and verify compliance with measures developed in coordination with CDFW through reporting scheduled established during coordination.

Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
<i>Cultural Resources</i>					
CUL-1	The Project applicant shall retain a Project Archaeologist (meeting or exceeding the Secretary of the Interior’s standards) to prepare an Archaeological Monitoring Plan prior to ground disturbing activities that describes the procedures for the appropriate identification and treatment of archaeological resources if any are discovered during grading or construction activities. The Monitoring Plan shall include provisions to halt work in the immediate area in the event of a discovery to allow for resource evaluation. The plan shall also identify the need for monitoring by both a cultural resources specialist and Native American monitors and provide detailed guidance outlining when and for what activities monitors must be present. The Project Archaeologist shall also prepare a report of findings after construction is completed.	Pre-Construction	Project Archaeologist (Project’s Environmental Team)	Prepare plan prior to construction and comply with identified monitoring and reporting plan requirements during construction.	Prepare an Archaeological Monitoring Plan and comply with identified monitoring and reporting plan requirements.
CUL-2	The Project Archaeologist shall develop a Worker’s Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for the treatment of cultural resources as well as procedures to follow in the event of a cultural resources discovery. This training program shall be given to the crew before ground disturbing work commences and shall include handouts to be given to new workers.	Pre-Construction, Construction	Project Archaeologist (Project’s Environmental Team)	Prepare a WEAP prior to construction and provide crew training during the construction phase prior to crews performing work.	Provide WEAP plan prior to construction and monthly training signature verification during construction.

Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
<i>Cultural Resources continued</i>					
CUL-3	The Project applicant shall retain a qualified cultural resources monitor prior to the commencement of ground disturbing activities to monitor such activities as prescribed by the Archaeological Monitoring Plan. The monitor shall be granted stop-work authority in the event an unanticipated discovery is made. The monitor shall immediately evaluate the discovery to determine whether additional treatment is warranted. Construction activities may not resume in the area immediate to the discovery until authorized by the monitor.	Construction	Project Archaeologist (Project's Environmental Team)	Monitor and report per the frequency and individual conditions identified in the Archaeological Management Plan.	Report on monitoring monthly or as prescribed by the Archaeological Management Plan. Report unanticipated discoveries to the Project Archaeologist immediately for additional evaluation.

Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
<i>Tribal Resources</i>					
TRC-1	<p>The following measures shall occur to mitigate for potential inadvertent discoveries:</p> <p>The Project applicant's Project Archaeologist shall develop a Standard Operating Procedure in conjunction with the Archaeological Monitoring Plan (see CUL-1) prior to ground disturbing activities that will describe points of contact, a timeline and a schedule for the project. The Monitoring Plan shall be provided to Native American monitors and shall include provisions to halt work in the immediate area in the event of a discovery to allow for resource evaluation. The plan shall also identify the need for monitoring by both a cultural resources specialist and Native American monitors and provide detailed guidance outlining when and for what activities monitors must be present.</p>	Pre-Construction	Project Archaeologist (Project's Environmental Team)	Report completion of plan and document plan submittal and coordination with Native American monitors. Report monthly or as prescribed by the Archaeological Management Plan.	Prepare the Archaeological Management Plan prior to construction and report plan submittal and cooperation with Native American monitors.
TRC-2	<p>The following measures shall occur during monitoring to minimize the potential for destruction or damage to subsurface, previously undiscovered archaeological and/or tribal cultural resources and to identify any such resources at the earliest possible time during project-related earthmoving activities, the project applicant and its contractor(s) shall:</p> <p>Native American monitors from culturally affiliated Native American Tribes will be invited to monitor vegetation grubbing, stripping, grading, or other ground-disturbing activities in the project area to determine the presence of</p>	Construction	Project Archaeologist (Project's Environmental Team)	Ongoing; keep monitors apprised of construction schedule and Archaeological Management Plan requirements.	Invite Native American monitors to monitor ground disturbing activities. Document coordination monthly or as prescribed in

	<p>any cultural resources. Native American representatives from culturally affiliated Native American tribes act as a representative of their Tribal government and shall be consulted before any cultural studies or ground-disturbing activities begin.</p> <p>Native American representatives and Native American monitors have the authority to identify sites or objects of significance to Native Americans and to request that work be stopped, diverted, or slowed if such sites or objects are identified within the direct impact areal however, only a Native American representative can recommend appropriate treatment of such sites or objects.</p>				<p>the Archaeological Treatment Plan.</p>
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TRC-3	<p>The following measures shall be implemented to ensure the appropriate treatment of all unanticipated discoveries:</p> <ul style="list-style-type: none"> • Cultural objects that are contributing elements to Tribal Cultural Resources of significance to the United Auburn Indian Community have been identified within the project area. Impacts to such objects shall be mitigated by implementing culturally appropriate treatment of such objects when they are recovered as part of cultural resource surveys or identification efforts. Culturally appropriate treatment includes (but is not limited to) minimizing handling of cultural objects and leaving such objects in place within the landscape, rather than curating such objects at museums. If such objects have already been removed from the project area, then culturally appropriate treatment includes the return of such objects to the project area, in a location where they will not be subject to future impacts. Per the inadvertent discoveries mitigation measure, the CEQA lead agency representative shall notify the United Auburn Indian Community whenever additional cultural objects are found, and coordinate culturally appropriate treatment per United Auburn Indian Community's recommendation. • Should articulated or disarticulated human remains be discovered by Native American representatives or monitors from interested Native American Tribes, qualified cultural 	Construction	Project Archaeologist (Project's Environmental Team), CSUS representative	Provide and report on ongoing opportunities for monitoring and report in the event of unanticipated discoveries.	Coordinate with the United Auburn Indian Community to determine appropriate treatment of archaeological resources, including human remains. Document coordination efforts monthly or as prescribed in the Archaeological Management Plan.
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	<p>resources specialists or other project personnel during construction activities, work will cease in the immediate vicinity of the find (based on the apparent distribution of cultural resources), whether a Native American Monitor from an interested Native American Tribe is present or not. A qualified cultural resources specialist and Native American representatives and monitors from culturally affiliated Native American Tribes shall assess the significance of the find and make recommendations for further evaluation and treatment as necessary. These recommendations shall be documented in the project record. For any recommendations made by interested Native American Tribes which are not implemented, a justification for why the recommendations were not followed shall be provided in the project record.</p> <ul style="list-style-type: none"> • Should adverse impacts to tribal cultural resources, unique archaeology, or other cultural resources occur, consultation with the United Auburn Indian Community regarding mitigation contained in the Public Resources Code sections 21084.3(a) and (b) and CEQA Guidelines section 15370 shall occur, to coordinate for potential compensation for the impact by replacing or providing substitute resources or environments. 				
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Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
<i>Paleontological Resources</i>					
PAL-1	A Project Paleontologist (meeting the Society of Vertebrate Paleontology [SVP] standards) shall prepare a Paleontological Resources Monitoring and Mitigation Plan prior to the commencement of ground disturbing activities. This plan shall address specifics of monitoring and mitigation and comply with the recommendations of the Society of Vertebrate Paleontology (2010). The Project Paleontologist shall also prepare a report of the findings of the monitoring plan after construction is completed.	Pre-Construction	Project Paleontologist (Project's Environmental Team)	Prepare plan prior to construction and comply with identified monitoring and reporting plan requirements during construction.	Prepare a Paleontological Monitoring and Mitigation Plan and comply with identified monitoring and reporting plan requirements.
PAL-2	The Project Paleontologist shall develop a Worker's Environmental Awareness Program (WEAP) to train the construction crew on the legal requirements for preserving fossil resources as well as procedures to follow in the event of a fossil discovery. This training program shall be given to the crew before ground disturbing work commences and shall include handouts to be given to new workers.	Pre-Construction, Construction	Project Paleontologist (Project's Environmental Team)	Prepare a WEAP prior to construction and provide crew training during the construction phase prior to crews performing work.	Provide WEAP plan prior to construction and monthly training signature verification during construction.

Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
<i>Paleontological Resources continued</i>					
PAL-3	All ground disturbances in the project area that occur in previously undisturbed sediment mapped as the Modesto Formation or Riverbank Formation shall require monitoring. Monitoring should be conducted by a Paleontological Monitor meeting the standards of the SVP (2010) and under the supervision of the Project Paleontologist. The Project Paleontologist may periodically inspect construction activities during ground disturbing work to adjust the level of monitoring in response to subsurface conditions. Full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Project Paleontologist. Paleontological monitoring shall include inspection of the exposed sedimentary units during active excavations within sensitive geologic sediments. The monitor shall have authority to temporarily divert activity away from exposed fossils to evaluate the significance of the find, and should the fossils be determined significant, professionally and efficiently recover the fossil specimens and collect associated data. Paleontological Monitors shall record pertinent geologic data and collect appropriate sediment samples from any fossil localities.	Construction	Project Paleontologist (Project's Environmental Team)	Monitor and report per the frequency and individual conditions identified in the Paleontological Mitigation and Management Plan.	Report on monitoring monthly or as prescribed by the Paleontological Mitigation and Monitoring Plan. Report unanticipated discoveries to the Project Archaeologist immediately for additional evaluation.

Mitigation Measure No.	Mitigation Measure	Project Phase	Responsible Party	Frequency of Monitoring & Reporting	Compliance
Water Quality Resources					
WQ-1	<ul style="list-style-type: none"> ○ Prepare a storm water pollution prevention plan (SWPPP) prior to construction activities, as required by the State Water Resources Control Board (SWRCB) General Permit for Construction Activities. Implementation of the plan starts with the commencement of demolition-related activities and continues through the completion of the project. Upon completion of the project, the sponsor must submit a Notice of Termination to the SWRCB to indicate that demolition is completed. At minimum, this plan would include the following requirements: ○ In the unlikely event that demolition does occur during a wet period, runoff from the project area shall be regulated through a storm water management/erosion control plan that should include provision for silt traps/basins, grading of surface flows to silt traps, and covering of loose material or stockpiles to divert runoff. Sediment basin/traps shall be located and operated to minimize the amount of offsite sediment transport. Any trapped sediment shall be 	Pre-Construction, Construction, Post-construction	Qualified SWPPP QSD (Project's Environmental Team)	Prepare plan prior to construction and comply with identified SWPPP reporting requirements during construction. Report on Post-construction compliance as prescribed in the SWPPP and per the General Permit.	Prepare a SWPPP and comply with identified monitoring and reporting protocols per the SWPPP and per the General Permit.

	<p>removed from the basin or trap and placed at a suitable location onsite, away from concentrated flows, or removed to an approved disposal site.</p> <ul style="list-style-type: none"> ○ Best Management Practices selected and implemented for the project shall be in place and operational prior to the onset of major earthwork on the site. The construction phase facilities shall be maintained regularly and cleared of accumulated sediment as necessary. ○ Hazardous materials such as fuels and solvents used on the construction sites shall be stored in covered containers and protected from rainfall, runoff, accidental spill, and vandalism. A stockpile of spill cleanup materials shall be readily available at all construction sites. Employees shall be trained in spill prevention and cleanup, and individuals shall be designated as responsible for prevention and cleanup activities. ○ Refueling and maintenances of vehicles shall be conducted outside of the creek floodplain wherever practicable. All refueling or maintenance activities shall include secondary containment. 				
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	<p>In addition, in accordance with the General Permit, the SWPPP shall detail a post construction stormwater maintenance schedule and best management practices, including:</p> <ul style="list-style-type: none"> ○ Source Control Measures (waste management area design, vehicle wash area design, other measures as applicable); ○ Treatment Control Measures (bioretention planters, vegetated swales, infiltration measures); and ○ Low Impact Development Measures (bioretention planters, infiltration measures, pervious pavement). 				
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