

Section 4:

Mitigation Monitoring and Reporting Plan

4.1 Mitigation Monitoring Implementation

The Channel Islands Telecommunication Company (CITC) proposes to install telecommunication facilities at up to 15 locations on four islands within the Channel Islands National Park. The California Public Utilities Commission (CPUC) prepared an Initial Study (IS) to assess the project's potential environmental effects. The majority of the project's impacts would occur during project construction. Mitigation measures were proposed to reduce potentially significant adverse impacts to a less than significant level.

The purpose of this Mitigation Monitoring and Reporting Plan (MMRP) is to ensure effective implementation of each mitigation measure identified in the Mitigated Negative Declaration (MND). Mitigation measures for the project, as well as monitoring guidelines and an implementation schedule are presented in Table 4.1-1.

4.1.1 MONITORING

Mitigation monitoring during construction will be conducted by the NPS due to the remoteness of the project sites. NPS monitors will be onsite, as determined by the NPS, to verify compliance with project mitigation measures. The NPS may elect to develop a monitoring program to describe roles and responsibilities, compliance standards, enforcement procedures, reporting procedures, and communication processes.

4.1.2 REPORTING

Compliance reports will be prepared on a monthly basis (at a minimum) during construction. These compliance reports will be prepared by the NPS and provided to the CPUC. The monthly reports will document construction progress, compliance activities, documentation of any previously undiscovered cultural resources, and any issues with implementing mitigation or compliance.

In the event of an incident or non-compliance with mitigation requirements, the NPS and CPUC will be contacted immediately, or as determined through consultation. The NPS will then determine the appropriate actions to bring the project back into compliance. The CPUC will be subsequently provided a written Notification of Incident that reports the issue and corrective actions taken.

4.2 Project Modifications

The NPS, as the monitoring agency, will identify potential project modifications that may be necessary during the course of project construction. Any project modification requests will be submitted by the applicant to both the CPUC and NPS, and reviewed for each agency's determination. Approved project modifications must be consistent with California Environmental

Quality Act requirements and may not increase the severity of a project impact or create a new significant impact. A project modification request typically includes the following information:

- Detailed description of the location, including maps, photos, and/or other supporting documents
- How the project modification request deviates from a project requirement
- Biological resource survey or verification that no biological resources would be significantly impacted
- Cultural resource surveys or verification that no cultural resources would be significantly impacted
- Agency approval (if necessary)

Table 4.1-1: Mitigation Monitoring Plan		
Mitigation Measure	Monitoring Requirement	Time of Action
<i>Rare, Threatened, and Endangered Species</i>		
<p>Mitigation Measure RTE Species-1: (Location 1): Installation at Location 1 (Santa Barbara Island Ranger Station) shall be limited to months outside the breeding periods of the brown pelican (November 1 through September 30), burrowing owl (March 1 through August 30), and Xantus’s murrelet (February 1 through July 25). An NPS ranger or qualified biologist shall conduct a pre-installation survey to determine the proximity of brown pelican, burrowing owl, or Xantus’s murrelet if installation at this location must occur within the nesting season of these species. The biologist shall determine the appropriate survey radius from the work area depending on site conditions and anticipated noise generated by the installation activities. If nests are found, the biologist shall establish a no-work buffer as appropriate for the site conditions. No work shall be allowed within the buffer until nestlings have fledged, as determined by the biologist.</p>	<p>Verify that installation at Location 1 is limited to October, outside of the designated sensitive bird breeding periods.</p> <p>If installation at Location 1 must occur within the nesting season(s), verify that an NPS ranger or qualified biologist conducts required nesting surveys, and establishes any necessary no-work buffers.</p>	<p>Prior to and during installation at Location 1</p>
<p>Mitigation Measure RTE Species-2: A-qualified biologist shall check for any active bird nests on the areas of installation (within 10 feet of installation areas) prior to commencing installation activities at all locations. If no active nests are found, work can commence. If nests are found work shall be delayed and the NPS biologist contacted. Work shall commence when the NPS biologist or a qualified biologist deems that nestlings have fledged.</p>	<p>Verify that no active bird nests (of any type) are within 10 feet from installation areas.</p> <p>If active nests are found, the NPS biologist must be contacted and work delayed until the NPS biologist or qualified biologist determines that nestlings have fledged.</p>	<p>Prior to and during installation</p>

Table 4.1-1 (Continued): Mitigation Monitoring Plan

Mitigation Measure	Monitoring Requirement	Time of Action
<i>Cultural Resources</i>		
<p>Mitigation Measure CR-1: To minimize the potential for significant impacts on previously known or as of yet undiscovered historic properties and/or features during any ground-disturbing activities, the following measures shall be required:</p> <ol style="list-style-type: none"> Prior to installation, if deemed appropriate by the NPS Park Archaeologist, sensitivity training of all contractors and construction workers in the project area shall be conducted. Workers shall be educated in the recognition of archaeological resources (e.g., historic and prehistoric artifacts typical of the general area), procedures to report such discoveries, NPS no-collection policies, and CITC construction protocols to ensure that installation activities avoid impacts to potentially significant cultural resources. The NPS Park Archaeologist shall have the authority to halt or redirect the installation activity if potentially significant archaeological features or materials are uncovered. Evidence of compliance with NPS sensitivity training requirements must be submitted to the CPUC prior to installation activities. During installation activities and if deemed necessary by the NPS Park Archaeologist, an NPS-approved archaeological monitor shall be present during ground disturbing activities to ensure that archaeological artifacts, cultural deposits, and human remains are not disturbed. In the event that as of yet undiscovered archaeological artifacts, cultural deposits, or human remains are encountered during installation, all work shall stop in the immediate vicinity of the find and the NPS Park Archaeologist shall be notified at the earliest opportunity. As appropriate, additional cultural resources surveys shall be conducted to inventory the cultural resources within areas disturbed during installation. Installation activities shall not resume until the NPS Park Archaeologist deems the cultural resource has been appropriately documented and protected. At the NPS Park Archaeologist's discretion, the location of ground disturbing activities may be relocated elsewhere on the project site to avoid cultural resources. 	<p>Verify that the NPS Park Archaeologist has determined whether a cultural resources training and/ or monitoring program is necessary prior to installation.</p> <p>Verify that any NPS cultural resource training and/or monitoring program is implemented.</p> <p>If cultural resources are found, verify that part (c.) is implemented.</p>	<p>Prior to and during installation</p>