CHAPTER 4

Mitigation Monitoring and Reporting Program

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a lead agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment." In addition, CEQA Guidelines Section 15097(a) requires that:

> *…In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.*

The California Department of Toxic Substances Control (DTSC) is the Lead Agency under CEQA for the project and, therefore, is responsible for administering the MMRP and ensuring the mitigation measures adopted to avoid or substantially lessen significant environmental effects are implemented. The MMRP is prepared pursuant to CEQA Guidelines Section 15097. DTSC also will consider adopting each of these MMRP mitigation measures as ARARs (or in the alternate make findings as to why the mitigation measures are not being adopted as ARARs pursuant to its status as Lead Agency under the HWCL). However, it is premature to make such a determination now, as DTSC will rely on the Corrective Measures Study (CMS) to determine whether the mitigation measures in this MMRP prepared under CEQA also qualify as ARARs pursuant to HWCL. In either event, the mitigation measures described in this MMRP represent DTSC's summary of those mitigation and monitoring requirements to fulfill the agency's CEQA obligations. DTSC will make a separate, individualized determination of whether to adopt the measures as an ARAR upon public review and comment on the CMS.

The MMRP establishes a framework that DTSC, Boeing, DOE, NASA, and others will use to implement the mitigation measures adopted in connection with project approval and the monitoring and reporting of such implementation. **Table 4-1**, *Mitigation Monitoring and Reporting Program*, describes the required mitigation measures and identifies the implementation schedule/timing and reporting requirements as well as the enforcement responsibilities and method of verification as follows:

- **Implementation Schedule/Timing:** The schedule, timing, and/or frequency at which the party responsible will implement the requirements outlined by the mitigation measure.
- **Reporting Requirements:** Documentary evidence demonstrating compliance with the requirements of the mitigation measure.
- **Enforcement Responsibility:** The agency responsible for verifying and enforcing compliance with the requirements of the mitigation measure.
- **Method of Verification:** The action the Enforcement Agency will employ to ensure compliance with the requirements of the mitigation measure.

The mitigation measures identified in this MMRP will be adopted by DTSC based on the environmental analyses in the PEIR.

The MMRP will remain available for public review during implementation of the cleanup project. The mitigation measure numbers used in the MMRP reflect the mitigation measure numbers used in the PEIR.

Should specific project activities warrant subsequent or supplemental CEQA review under Public Resources Code section 21166/CEQA Guidelines section 15162 et seq., then additional mitigation measures may become necessary to avoid or substantially reduce significant environmental impacts associated with those activities. In Table 4-1, the mitigation measures are organized by environmental issue areas, which begin on the following pages:

Environmental Issue	Page
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Table 4-1
Mitigation Monitoring and Reporting Program

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Air Quality				
Mitigation Measure AQ-1: Tier 4 Rated Engines. All onsite equipment greater than 50 hp would be required to use Tier 4 final rated engines or have emissions levels equivalent to that of Tier 4 final rated engines (Engines that are not Tier 4 but have been retrofitted with catalytic converters and/or diesel particulate filters, such that the emissions reductions of Tier 4 engines are met).	Prior to mobilization of equipment to the site	Language to be included in contractor scopes of work Documentation from the equipment manufacturer or retrofit installer demonstrating vehicles meet Tier 4 rated engine requirements Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating equipment meets Tier 4 requirements
	During remediation	Current documentation to be kept onsite and available to DTSC or its designated consultant upon request	DTSC	Ongoing field verification by DTSC or its designated contractor of a random but representative sample of equipment
Mitigation Measure AQ-2: Perimeter Air Monitoring Plan. TheRPs, under the direction of DTSC, shall implement a perimeter air monitoring plan (AMP). The AMP includes real-time perimeter air monitoring for dust and volatile chemicals, as well as more limited time-integrated sampling for volatile chemicals and dust at the locations and frequencies outlined in the AMP, which shall be approved by DTSC. During the excavation activities, water or a similar suppressant (e.g., Soil Seal), will be applied as necessary to suppress potential dust and emissions, including volatiles. The AMP shall include action standards with corresponding actions if/when action standards are exceeded. Such actions could include additional water, the use of foam or soil binding agents, tarps, or the cessation of activities. Air monitoring logs shall be maintained onsite at all times per the AMP. A log containing dates on which action standards are triggered and response shall be maintained onsite. These logs shall be made available to DTSC and VCAPCD for inspection upon request.	Prior to remediation	Submittal of Air Monitoring Plan for DTSC approval in consultation with VCAPCD Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with VCAPCD	The Air Monitoring Plan shall be reviewed and approved by DTSC in consultation with VCAPCD DTSC review of regular compliance reports documenting approved Air Monitoring Plan
	During remediation	Documentation of air monitoring logs, to be kept onsite and available to DTSC and VCAPCD or its designated consultant upon request The RPs or their designee/contractor shall review air monitoring data daily Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with VCAPCD	DTSC review of regular compliance reports documenting approved Air Monitoring Plan Ongoing field verification by DTSC or its designated contractor that requirements of the approved Air Monitoring Plan are being implemented and verification of a random but representative sample of air monitoring logs
Mitigation Measure AQ-3: Fugitive Dust Control. The RPs, under the direction of DTSC, shall monitor and control fugitive dust emissions by measures prescribed by VCAPCD Rule 55 and identified below and documented in an approved Soil Management Plan (see Mitigation Measure AQ-4). The RPs, under the direction of DTSC, shall work with both the VCAPCD and LARWQCB to review the various aspects of the Soil Management Plan that may fall under multiple jurisdictions. At a minimum, the following fugitive dust control measures shall be used to reduce both onsite and offsite fugitive dust emissions: a. To prevent wind-driven dust during operations, water spray/mists or similar suppressant (e.g., Soil Seal) shall be used during bulk material handling, earth-moving, remediation and demolition	Prior to remediation	Submittal of Soil Management Plan for DTSC approval in consultation with VCAPCD and LARWQCB Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with VCAPCD and LARWQCB	The Soil Management Plan, which includes fugitive dust control measures, shall be reviewed and approved by DTSC in consultation with VCAPCD and LARWQCB
	During remediation	Documentation of visual inspections by the RPs or their designated contractor CARB or USEPA-certified opacity assessments	DTSC in consultation with CARB and USEPA	Ongoing field verification by DTSC or its designated contractor that the requirements of the Soil Management Plan are being implemented

Mitigation Measure	Implementation		Enforcement	
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activities, and vehicle movement on unpaved roads. Application of water dust suppressant shall occur at least 4 times per day on active areas of disturbance and unpaved roads. Application of a long-term soil suppressant (e.g., Soil Seal) shall be used for areas of disturbance that are inactive for more than five days.		Documentation to be provided to DTSC as part of regular compliance reports		An observer certified by the CARB or the USEPA shall periodically perform opacity assessments
b. To prevent wind-driven dust at storage piles, inactive storage piles shall be covered with anchored plastic sheeting and use water spray/mists at active storage piles.				
c. To prevent soil from being tracked away from the work area, outbound trucks exporting bulk material shall remain on paved roads to the extent practicable, and if travel on unpaved roads is required, rumble strips (wheel shaking device to remove bulk material from tires and undercarriage) shall be placed at the location where the unpaved road joins paved roads. To minimize dust on unpaved roads at the site, limit speed to 15 miles per hour or less.				
d. To control dust emissions from outbound trucks, the entire surface area of outbound truck loads shall be covered with secured tarps or a container-type enclosure shall be used.				
e. To avoid fugitive dust during high wind conditions, soil disturbance activities shall be ceased, if onsite wind speeds exceed 25 miles per hour for at least 5 minutes in an hour.				
f. To ensure that any visible dust emissions are controlled, an observer certified by the CARB or the USEPA shall periodically perform opacity assessments.				
g. Additional dust control measures which include, but are not limited to, maintaining a soil moisture content at a minimum of 12 percent, conduct watering as necessary to prevent visible dust emissions from exceeding 100 feet in length in any direction, apply water/dust suppressants to at least 80 percent of all inactive disturbed areas daily when there is wind driven fugitive dust emissions, establish vegetative ground cover within 21 days after active operations have ceased, water all roads used for any vehicular traffic to suppress dust, apply a chemical stabilizer to all unpaved road surfaces, and apply chemical stabilizer to open storage piles or apply water to 80 percent of the surface area of all open storage piles on a daily basis when there is evidence of wind driven fugitive dust.				
h. Contingency control measures which include, but are not limited to, applying water to soil not more than 15 minutes prior to moving such soil, apply water with a mixture of chemical stabilizer to maintain a stabilized surface for a period of 6 months on the last day of active operations prior to a weekend, holiday, or when active operations will not occur for a period of 4 days or more, apply water or chemical stabilizer on unpaved roads and water on open storage piles, and cover all haul vehicles or comply with freeboard requirements.				
i. New man-made deposits of bulk material or bulk material delivered from off-site shall be stabilized within 24 hours of making such bulk material deposits. Stabilization procedures shall include one or more				

Mitigation Measure	Implementation		Enforcement	
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of the following: (1) application of water to at least 70 percent of the surface area of any bulk material deposits at least 3 times for each day that there is evidence of wind driven fugitive dust; or (2) application of chemical stabilizers in sufficient concentration so as to maintain a stabilized surface for a period of at least 6 months; or (3) installation of wind breaks of such design so as to reduce maximum wind gusts to less than 25 miles per hour in the area of the bulk material deposits. j. Man-made deposits of bulk material be stabilized within 24 hours of making such bulk material deposits by utilizing one or more of the following: (1) application of water to at least 70 percent of the surface area of any bulk material at least three times per day when there is evidence of wind driven fugitive dust; (2) application of chemical stabilizers in sufficient concentration so as to maintain a stabilized surface for a period of at least 6 months; or (3) install wind breaks to reduce maximum wind gusts to less than 25 miles per hour in the area of the bulk material deposits. k. Active operation with a disturbed surface area of more than 5,000 square feet shall not initiate any earth-moving activities unless a fugitive dust control plan is prepared and approved. The fugitive dust control plan will be a part of the Soil Management Plan, Mitigation Measures AQ-4.				
Mitigation Measure AQ-4: Soil Management Plan. The RPs, under the direction of DTSC, shall each prepare a plan for the management of soil that contains gasoline, diesel fuel, jet fuel, or other known reactive organic compounds (ROC). These soils shall be monitored and controlled by measures prescribed by VCAPCD Rule 74.29 and documented in a DTSC-approved Soil Management Plan. In addition to the fuels identified by Rule 74.29, the Soil Management Plan shall provide dust suppression for any active or inactive stockpile that is known or suspected to contain known ROC contaminants. Any equipment used in soil and groundwater operations will require a Permit to Operate from the VCAPCD, which will require compliance with VCAPCD Rule 74.29, Best Available Control Technology (BACT), Health Risk Assessment Requirements, and related requirements. The measures that shall be used to reduce ROC emissions include the following: a. To minimize emissions of ROCs to the atmosphere, active and inactive excavations and stockpiles of soil that contain gasoline, diesel fuel, jet fuel, or other known ROC contaminants, and emit ROCs in excess of 50 ppm above background, specifically as hexane, except non-repeatable momentary readings, shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with a continuous heavy-duty plastic sheeting (4 mil or greater) or other covering. The covering shall be overlapped at the seams and securely anchored to minimize headspace where vapors could accumulate.	Prior to remediation	Submittal of Soil Management Plan for approval by DTSC in consultation with VCAPCD and LARWQCB RPs to apply for applicable permits Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with VCAPCD and LARWQCB	The Soil Management Plan shall be reviewed and approved by DTSC in consultation with VCAPCD and LARWQCB DTSC review of regular compliance reports documenting approved plans and permits Ongoing field verification by DTSC or its designated contractor that the requirements of the Soil Management Plan and Site-Specific Mitigation Plans are being implemented and verification of a random but representative sample of logs

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
b. Monitoring of ROC emissions from soil stockpiles shall be performed as specified in VCAPCD Rule 74.29.				
c. Monitor for ROC contamination at least once every 15 minutes commencing at the beginning of excavation or grading and record all ROC concentration readings.				
d. A person handling ROC-contaminated soil at or from an excavation or grading site shall: (A) segregate ROC-contaminated stockpiles from non-VOC contaminated stockpiles such that mixing of the stockpiles does not take place. (B) Spray ROC-contaminated soil stockpiles with water and/or approved vapor suppressant and cover them with plastic sheeting for all periods of inactivity lasting more than one hour. (C) Conduct a daily visual inspection of all covered ROC contaminated soil stockpiles to ensure the integrity of the plastic covered surfaces. A daily inspection record must be maintained onsite. (D) Maintain a record of the identification and business addresses of the generator, transporter and storage/treatment facilities. Such record shall be signed by each party at the time custody is transferred. (E) Treat or remove contaminated soil from an excavation or grading site within 30 days, if feasible, from the time of excavation.				
e. If the ROC concentration in the excavated soil is measured at greater than 1,000 ppm, spray the soil with water or vapor suppressant and: (A) As soon as possible, but not more than 15 minutes, place the soil in sealed containers, or (B) As soon as possible, but not more than 15 minutes, load into trucks, moisten with additional water, cover and transport offsite, or (C) Implement other alternative storage methods approved in writing.				
f. A person treating ROC-contaminated soil shall: (A) Obtain a permit to construct and operate treatment equipment, as applicable, and (B) Implement ROC-contaminated soil decontamination measures, as approved in writing, which result in Best Available Control Technology applied during all segments, and which include, but are not limited to, at least one of the following: (i) Installation and operation of an underground ROC collection system and a disposal system prior to excavation. (ii) Collection and disposal of the ROC from the excavated soil onsite using approved equipment (iii) Any equivalent ROC-contaminated soil control measure previously approved in writing.				
g. A person shall not engage in or allow any onsite or offsite spreading, grading or screening of ROC-contaminated soil, which results in uncontrolled evaporation of ROC to the atmosphere.				
h. Loading trucks for contaminated soil must meet the following: (A) The truck and trailer shall be adequately tarped prior to leaving the site; no excavated materials shall extend above the sides or rear of the truck or trailer to prevent soil spillage during transport, and (B) The exterior of the truck, trailer and tires shall be cleaned off prior to the truck leaving the site.				

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Mitigation Measure AQ-5: Prohibit Idling. The RPs, under the guidance of DTSC, shall prohibit the idling of on-road and off-road heavy-duty diesel vehicles for more than 5 minutes at a time. This measure is consistent with California regulations and laws as well as CARB Air Toxics Control Measure requirements.	Prior to remediation	Hauling and cleanup contractors shall notify all operators of on- and off-road heavy-duty diesel equipment idling limits through written documentation of CARB Air Toxics Control Measure requirements associated with idling. Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting notification of idling prohibitions
	During remediation	Documentation of visual inspections by the RPs or their designated contractor Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of idling prohibitions DTSC review of regular compliance reports demonstrating implementation of idling prohibitions
Mitigation Measure AQ-6: Valley Fever. During heavy grading where the top 12 to 18 inches of soil would be disturbed, construction contractors shall comply with the following measures, as feasible to reduce potential Valley Fever impacts (VCAPCD, 2003): a. Restrict employment for grading activities to persons with positive coccidioidin skin tests (since those with positive tests can be considered immune to reinfection). b. Hire crews from local populations where possible, since it is more likely that they have been previously exposed to the fungus and are therefore immune. c. Require crews to use respirators during project clearing, grading, and excavation operations in accordance with California Division of Occupational Safety and Health regulations. d. Require that the cabs of grading and construction equipment to be air-conditioned or enclosed with sufficient ventilation and particulate matter filtration systems. e. Require crews to work upwind from excavation sites where possible. f. Where acceptable to the fire department, control weed growth by mowing instead of disking, thereby leaving the ground undisturbed and with a mulch covering. g. During rough grading and remediation, the access way into the project site from adjoining paved roadways should be paved or treated with environmentally safe dust control agents.	Prior to commencement of grading	Included in the RPs contractors' scopes of work and agreements Provide summary report documenting steps taken in conformance with AQ-6.	DTSC	DTSC review of regular compliance reports demonstrating implementation of Valley Fever reduction measures
	During remediation	Documentation of ongoing visual inspections by the RPs or their designee/contractor Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of implementation of valley fever reduction measures DTSC review of regular compliance reports demonstrating implementation of Valley Fever reduction measures

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Biological Resources				
Mitigation Measure BIO-1: Critical Habitat and Listed Species Avoidance. Remediation activities in critical habitat or containing state and federally listed species shall be minimized to the extent practicable and consistent with applicable laws. A USFWS- and CDFW-approved biologist[1] shall be onsite to monitor any ground-disturbing activities within critical habitat or occupied habitat for listed species, if determined to be necessary by USFWS or CDFW during review and prior to DTSC's approval of applicable draft cleanup decision documents. These measures shall be discussed with USFWS for consistency with conservation measures identified as a result of completed Endangered Species Act consultation for the project. For areas where an AOC exception is applied and critical habitat or habitat for listed species are avoided, the following mitigation shall be required: a. If a federal- or state-listed animal species is identified during work activities, work shall halt until the biologist determines appropriate actions to avoid and minimize harm to the species. Federally listed wildlife species shall not be handled or relocated without first obtaining take authorization from USFWS and/or CDFW. USFWS and/or CDFW shall be consulted to determine an appropriate response. State-listed wildlife species shall not be pursued, handled, relocated, or killed without first providing information about the activity to CDFW to its satisfaction so that it may assess the impact on the state-listed wildlife. Any conditions that CDFW requires after assessing the information shall be implemented when conducting the work activities and such conditions may include avoidance, minimization, and mitigation measures, and applying for and receiving an incidental take permit. If an AOC exception is not applied, and where remedial activity is required in critical habitat or habitat for listed species, the following mitigation is required: a. USFWS and CDFW shall be consulted prior to the start of any work activities within critical habitat, occupied habitat, or disturbance or removal of a listed plant species. b. Work zones shall be monitored for the presence of listed species prior to and periodically during work activities by a CDFW-approved biologist. c. If a federal-listed animal species is identified during work activities, work shall halt until the biologist determines appropriate actions to avoid and minimize harm to the species. Federal-listed wildlife species shall not be handled or relocated without first obtaining take authorization from USFWS. USFWS shall be consulted to determine an appropriate response.	During any ground disturbing activities within critical habitat or occupied habitat for listed species If a federal- or state-listed animal species is identified during work activities, work shall halt until the approved biologist determines appropriate actions USFWS and/or CDFW shall be consulted immediately to determine an appropriate response	Technical memorandum by an USFWS and CDFW-approved biologist documenting onsite biological monitoring Documentation of USFWS and CDFW consultation, as needed RPs to apply for applicable permits, as needed Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS and CDFW	DTSC review of regular compliance reports demonstrating onsite biological monitoring and USFWS and CDFW consultation, as well as any approved permits

[1] A "USFWS-approved biologist/botanist" is one who is approved by USFWS for performing worker environmental awareness training, biological monitoring, or certain types of biological surveys for species protected under the Federal Endangered Species Act. A "CDFW-approved botanist/biologist" is one who is approved by CDFW for performing worker environmental awareness training, biological monitoring, or certain types of biological surveys for flora or fauna native to California, including species protected under the California Endangered Species Act.

Mitigation Measure	Implementation		Enforcement	
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d. State-listed wildlife species shall not be pursued, handled, relocated, or killed without first providing information about the activity to CDFW to its satisfaction, so that it may assess the impact on state-listed wildlife. Any permitting requirements and/or protective measures agreed upon by the RPs in consultation with CDFW shall be implemented when conducting the work activities, and may include avoidance/minimization measures, applying for and receiving an incidental take permit, as well as implementing requirements of the incidental take permit.				
Mitigation Measure BIO-2: Worker Environmental Awareness Program Training. Prior to the start of remediation, the RPs, under the direction of DTSC, shall retain a USFWS- and CDFW-approved biologist to provide Worker Environmental Awareness Program (WEAP) training to all construction workers onsite prior to initial vegetation or ground disturbance, and to any new workers arriving to the project site who are working in sensitive habitat areas. The training shall include materials to aid workers in identifying sensitive habitats, plants, and wildlife that should be avoided; applicable laws and regulations protecting such resources; and proper avoidance and communication procedures to protect sensitive biological resources, as well as common wildlife whenever possible.	Submittal of Program training materials for approval by DTSC prior to ground disturbance Provide training prior to initial vegetation or ground disturbance and to any new workers working in sensitive habitat areas	RPs to conduct and document Worker Environmental Awareness Program Training Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating implementation of the required trainings, including attendance rosters
Mitigation Measure BIO-3: Braunton's Milk-Vetch. Prior to vegetation or ground disturbance within areas affected by cleanup activities and suitable habitat where Braunton's milk-vetch have not been previously documented, focused surveys for Braunton's milk-vetch shall be conducted by a USFWS- and CDFW-approved botanist/biologist, retained by the RPs, under the direction of DTSC. The focused surveys shall be conducted within 1 year prior to vegetation or ground disturbance and during the appropriate blooming period (January through August). The number of visits necessary to determine if Braunton's milk-vetch plants are present can be determined by the approved botanist/biologist based on factors such as geographic location, the natural communities present, and the weather patterns of the year(s) in which the focused plant surveys are conducted. Within 30 days prior to site disturbance, all suitable habitat areas, represented by locations where Braunton's milk-vetch plants are currently present, where plants were detected in the past or during focused surveys referenced above, as well as locations where the Braunton's milk-vetch seed bank is likely to occur, shall be flagged by the botanist/biologist for avoidance and considered for an AOC exception. For areas where the AOC exception is applied and/or Braunton's milk-vetch plants and critical habitat can be avoided, the following mitigation is required: a. Prior to vegetation or ground disturbance, a USFWS-approved botanist/biologist shall delineate critical habitat and Braunton's milk-vetch occupied habitat for avoidance.	1 year prior to vegetation or ground disturbance and during the appropriate blooming period (January through August) Within 30 days prior to site disturbance, all suitable habitat, Braunton's milk-vetch occupied habitat, or likely seed bank locations considered for an AOC exception	Documentation of required focused surveys to be provided to DTSC as part of regular compliance reports Documentation of required avoidance flagging to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating survey results and avoidance flagging
	Prior to vegetation or ground disturbance to Braunton's milk-vetch occupied habitat or critical habitat, if an AOC exception is not applied	Submittal of a Conservation Plan for approval by DTSC in consultation with USFWS and CDFW USFWS and CDFW consultation, as needed Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS and CDFW	The Conservation Plan shall be reviewed and approved by DTSC in consultation with USFWS and CDFW DTSC review of regular compliance reports documenting approved Conservation Plan
	During vegetation or ground disturbance	Technical memorandum by an approved biologist documenting onsite biological monitoring Documentation of USFWS consultation, if needed	DTSC in consultation with USFWS	DTSC review of regular compliance reports documenting approved Conservation Plan, including biological monitoring and USFWS consultation Ongoing field verification by DTSC or its designated contractor of implementation of Braunton's Milk-Vetch mitigation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
If an AOC exception is not applied, and where remedial activity would result in disturbance or removal of Braunton's milk-vetch plants or its critical habitat, the following mitigation is required: a. Prior to vegetation or ground disturbance to Braunton's milk-vetch occupied habitat or critical habitat, a conservation plan shall be developed in consultation with USFWS and CDFW to protect this species, which shall identify effective conservation strategies that may include erecting fencing to prevent herbivory effects and insect pollinator habitat requirements. Recovery criteria for Braunton's milk-vetch identified in the *Recovery Plan for Six Plants from the Mountains Surrounding the Los Angeles Basin* (1999) shall be considered and included, as appropriate, in the preparation of the conservation plan, in consultation with USFWS. b. During vegetation or ground disturbance associated with remediation activities, clean topsoil shall be salvaged for reuse as appropriate and an approved biological monitor shall be onsite to make sure work is conducted within areas of occupied/critical habitat previously authorized by USFWS through its Biological Opinion. If imported soils are used for backfill of impacted areas, USFWS shall be consulted to determine the best available source of clean backfill and to identify any necessary soil amendments. Backfill shall not be sourced from a location that results in ecological impacts, such as sterile soils or soils harboring noxious weed seeds, and the source of backfill shall be selected in consultation with USFWS and CDFW during review and prior to DTSC's approval of applicable draft cleanup decision documents. Exhibit 14 of the 2022 Settlement Agreement outlines the process for DTSC decision-making regarding backfill for Boeing areas of responsibility. All backfill decisions shall ensure protection of human health and the environment. c. These measures shall be discussed with USFWS for consistency with conservation measures identified for this species as a result of completed Endangered Species Act consultation for the project. In addition, CDFW will be consulted for appropriate conservation measures to protect Braunton's milk-vetch when avoidance is not possible. d. Conservation measures and biological reporting related to Braunton's milk-vetch as identified in the USFWS's Biological Opinion for the proposed remediation activities shall be implemented.		Documentation to be provided to DTSC as part of regular compliance reports		
Mitigation Measure BIO-4: Weed Management Plan. Prior to any ground disturbing activities, the RPs under the direction of DTSC, shall prepare a Weed Management Plan in consultation with CDFW to prevent introduction of noxious and invasive species onsite, confirm and document that construction equipment is visually free of weeds and soil prior to bringing onsite, confirm backfill is free of invasive plant species, and ensure revegetation seed mixtures are free of noxious or invasive species. A Weed Management Plan will be required for all remediation areas prior to ground disturbing activities, although a single Weed Management Plan can be prepared to be applied to all such remediation	Prior to ground disturbing activities	Submittal of a Weed Management Plan for DTSC approval in consultation with CDFW Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	Review and approval of Weed Management Plan by DTSC in consultation with CDFW DTSC review of regular compliance reports documenting the approved Weed Management Plan
	During remediation	Ongoing visual inspection and documentation of equipment, backfill, and seed mixtures being free of	DTSC	Ongoing field verification by DTSC or its designated contractor of implementation of Weed Management

Mitigation Measure	Implementation		Enforcement	
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areas. Backfill shall not be sourced from a location that results in ecological impacts, such as sterile soils or soils harboring noxious weed seeds, and the source of backfill shall be selected in consultation with the USFWS and CDFW during review and prior to DTSC's approval of applicable draft cleanup decision documents. Exhibit 14 of the 2022 Settlement Agreement outlines the process for DTSC decision-making regarding backfill for Boeing areas of responsibility. All backfill decisions shall ensure protection of human health and the environment.		invasive plant species by the RPs or their designee/contractor Documentation to be provided to DTSC as part of regular compliance reports		Plan DTSC review of regular compliance reports documenting approved Weed Management Plan
Mitigation Measure BIO-5: Santa Susana Tarplant. Prior to ground disturbance, focused surveys for Santa Susana tarplant shall be conducted by a CDFW-approved botanist/biologist, retained by the RPs under the direction of DTSC, within suitable habitat affected by soil remediation activities. The focused surveys shall be consistent with CDFW 2018 protocols, and conducted within 3 years prior to initial vegetation or ground disturbance during the appropriate blooming period. The number of visits necessary to determine if Santa Susana tarplants are present can be determined by the CDFW-approved botanist/biologist based on factors such as nearby reference sites, as well as geographic location, habitat suitability, and the weather patterns of the year(s) in which the focused plant surveys are conducted. During the focused surveys, individual plants detected shall be marked or flagged for avoidance to the extent feasible. A suitable avoidance buffer shall be established by the CDFW-approved botanist/biologist. For areas where an AOC exception is applied and Santa Susana tarplant is avoided, the following mitigation shall be required. a. Prior to vegetation or ground disturbance, a CDFW-approved botanist/biologist shall delineate Santa Susana tarplant occupied habitat for avoidance. If an AOC exception is not applied, and where remedial activity would result in disturbance or removal of Santa Susana tarplant, the following mitigation is required: a. Prior to conducting any remedial activities, information about the remedial activity shall be provided to CDFW to its satisfaction so that it may assess the impact on the Santa Susana tarplant. Any conditions that CDFW requires after assessing the information shall be implemented where feasible when conducting the remedial activity and such conditions may include avoidance, minimization, and mitigation measures, and applying for and receiving an incidental take permit. b. A CDFW-approved biologist shall determine the number of individual Santa Susana tarplants that would be impacted prior to any ground-disturbance activities. c. Prior to vegetation or ground disturbance to Santa Susana tarplant occupied habitat, a draft Santa Susana Tarplant Restoration Plan shall be prepared and submitted to CDFW for review prior to any vegetation or ground disturbance. To ensure consistency with the Revegetation Plan required under BIO-6, the Santa Susana Tarplant	Prior to initial vegetation or ground disturbance to Santa Susana tarplant occupied habitat Surveys shall be conducted within 3 years prior to initial vegetation or ground disturbance and during the appropriate blooming period	Written documentation of required focused surveys and delineation of avoidance areas Submittal of a Santa Susana Tarplant Restoration Plan for DTSC approval in consultation with CDFW Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	Review and approval of the Santa Susana Tarplant Restoration Plan by DTSC in consultation with CDFW DTSC review of regular compliance reports demonstrating focused survey results and documenting approved Santa Susana Tarplant Restoration Plan
	During and following vegetation or ground disturbance activities	Technical memorandum by a CDFW-approved biologist/botanist documenting onsite biological monitoring Implementation of the Santa Susana Tarplant Restoration Plan Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	DTSC review of regular compliance reports documenting onsite biological monitoring Ongoing field verification by DTSC or its designated contractor of implementation of Santa Susana Tarplant Restoration Plan

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Restoration Plan may be integrated into the overall Revegetation Plan. At a minimum, the tarplant restoration plan shall entail the following: • Identification of the number of individual tarplants that were observed during the most-recent focused plant survey prior to impacts. • Identification of proposed enhancement areas through habitat characterization. • Methods for restoring tarplant habitat to pre-project conditions to the greatest extent feasible, and to create conditions suitable for establishment of Santa Susana tarplant and other onsite local native species. • Methods to restore habitat elements for insect pollinators such as retaining woody debris, brush piles with various dimensions of wood, rocks and cobble of various sizes. • Tarplant seeds shall be collected onsite to be successfully re-introduced into onsite restored habitat areas (i.e., backfilled areas) as well as local areas where seeds are gathered and used near the impact areas. Exhibit 14 of the 2022 Settlement Agreement outlines the process for DTSC decision-making regarding backfill for Boeing areas of responsibility. All backfill decisions shall ensure protection of human health and the environment. • RPs and funding mechanism. • Performance standards and success criteria for measuring and determining establishment of tarplant individuals. Plant establishment shall be based on CDFW- qualitative and quantitative survey methods, details of which shall be specified in the restoration plan. • Five-year monitoring and reporting methods. • Maintenance requirements. • Weed control of targeted invasive plants (e.g., fountain grass) and maximum weed cover allowance. d. During vegetation or ground disturbance associated with remediation activities, a CDFW-approved biological monitor shall be onsite to establish avoidance areas and track any impacts to individual plants. The actual number of individual plants removed shall be documented in the final restoration plan for review by CDFW prior to implementation.				

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Mitigation Measure BIO-6: Revegetation Plan. Prior to any ground disturbances, a site-specific revegetation plan shall be prepared by a qualified restoration ecologist, retained by the RPs and approved by CDFW, for disturbance of native habitats and/or suitable habitat for sensitive plants or wildlife. The revegetation plan shall include a description of existing conditions for each area, disturbances, compensation mitigation, site preparation, revegetation methods, maintenance and monitoring criteria, performance standards, and adaptive management practices. The Weed Management Plan that is required in accordance with BIO-4 shall be referenced accordingly. Appropriate restoration measures shall be prescribed based on site location, slope, and remoteness. The plan shall identify cover standards that shall be developed for each plant community target, and cover values established for each layer (i.e., herb, shrub, and/or tree layers). The plan shall identify the quantity and quality of habitats to be restored onsite; distinguish micro-habitat requirements for specific native habitats to be restored including soil, moisture, nutrient and pH requirements, and topographic requirements such as aspect and slope; and identify micro-habitat requirements for sensitive wildlife species (i.e., woody material). The amount and extent of habitat revegetation shall be identified in the revegetation plan and shall be determined based on habitat quality and through coordination with CDFW prior to the initiation of any ground disturbance. Restoration shall incorporate the use of a native seed mix selected in consultation with CDFW, and soil stabilization BMPs shall be incorporated to help in the reseeding success, including soil binders, erosion mats, and erosion control check dams, which shall be used in accordance with the Stormwater Pollution Prevention Plan. The plan shall require that any large boulders removed during cleanup be replaced in a similar layout as existing conditions to retain the natural character of the area. Appropriate restoration measures, goals, and monitoring requirements shall be included in the plan based on site location, slope, and remoteness, and shall be specified on all CDFW-reviewed construction plans. The revegetation plan shall require that clean, topsoil be stored for revegetation purposes; however, large stockpiles of clean topsoil shall be discouraged as this can negatively impact favorable soil properties, such as, but not limited to a reduction of organic matter (e.g., erosion, leaching, decomposition, dilution through soil horizon mixing), microbial biomass, bulk density, water holding capacity, and viable seed populations. Clean topsoil that is preserved specifically for restoration purposes shall not be stored for greater than six months, unless standard conservation methods are being implemented, to minimize the potential for the soil to lose its beneficial qualities (e.g., soil microbials, beneficial fungi, and nutrients) and so that the topsoil does not degrade to the point that it is sterile with no future benefit to the biomass and restoration efforts. Where imported soils are used for backfill of impacted areas, USFWS and CDFW shall be consulted to determine the best available source of clean backfill and to identify any necessary soil	Prior to ground disturbing activities	Submittal of a Revegetation Plan for DTSC approval in consultation with CDFW Documentation to DTSC of coordination with CDFW Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	The Revegetation Plan shall be reviewed and approved by DTSC in consultation with CDFW DTSC review of regular compliance reports documenting the approved Revegetation Plan
	During remediation	Documentation of ongoing visual inspections and monitoring by the RPs or their designee/contractor Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of the implementation of the Revegetation Plan DTSC review of regular compliance reports documenting approved Revegetation Plan

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
amendments. In addition, appropriate personnel shall be consulted for evaluating current soil properties for any proposed backfill sources. Backfill shall not be sourced from a location that results in ecological impacts, such as sterile soils or soils harboring noxious weed seeds, and the source of backfill shall be selected in consultation with USFWS and CDFW during review and prior to DTSC's approval of applicable draft cleanup decision documents. Exhibit 14 of the 2022 Settlement Agreement outlines the process for DTSC decision-making regarding backfill for Boeing areas of responsibility. All backfill decisions shall ensure protection of human health and the environment. The revegetation plan shall identify reseeding techniques that are appropriate for specific locations within the SSFL site, such as reseeding by drilling, broadcast, or hydro seeding techniques, and shall specify any soil amendments that may be needed based on the soil composition, including pH and nutrient content. The plan shall identify the timing of initial seed application following soil and slope stabilization activities, followed by a secondary application prior to the onset of winter rains. The plan shall require that reseeding consist of seed collected from the SSFL site and/or immediate area, in conformance with Mitigation Measure BIO-20 (Seed Collection and Cuttings for Habitat Restoration). Lastly, the revegetation plan must include the proposed timetable for implementing the restoration, including, site preparation, establishment of diverse plant species, maintenance, and additional enhancement to establish the restoration, including adaptive management strategies. CDFW recommends against use of hydroseeding for native plant restoration and the revegetation plan shall include alternative methods for planting. In addition, CDFW encourages the use of hand irrigation, especially in areas proximate to special-status species. Alternatives to temporary irrigation systems shall be described in the revegetation plan and indicate where such opportunities exist for best use of these alternative irrigation methods. It shall identify performance standards and long-term maintenance and management needs of the restoration, responsible parties, and funding mechanism.				
Mitigation Measure BIO-7: Special-Status Plants. Focused surveys for special-status vascular plants and non-vascular plants (i.e., moss and bryophytes) shall be conducted by a USFWS and CDFW-approved botanist/biologist, retained by the RPs, under direction of DTSC, prior to ground disturbance within suitable habitat affected by soil remediation activities. The following special-status plant species would potentially be affected: Malibu baccharis, Catalina mariposa lily, slender mariposa lily, Plummer's mariposa lily, western spleenwort, Brewer's calandrinia, round-leaved filaree, club-haired mariposa lily, late-flowered mariposa lily, Peirson's morning-glory, Lewis' evening-primrose, Island mountain-mahogany, San Fernando Valley spineflower, Parry's spineflower, small-flowered morning-glory, crowned forget-me-not, Norris' beard moss, slender-horned spineflower, trask yerba santa, Palmer's grapplinghook, vernal barley, mesa horkelia, decumbent goldenbush, ocellated Humboldt lily, tiny poppy, white-veined monardella, Ojai navarretia, chaparral nolina, Lyon's pentachaeta, hubby's phacelia, south coast	Surveys shall be conducted within 3 years prior to initial vegetation or ground disturbance during the appropriate blooming periods	Written documentation of required focused surveys and avoidance flagging Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS and CDFW	DTSC review of regular compliance reports documenting focused survey and avoidance flagging results
	During vegetation or ground disturbance	Technical memorandum by a USFWS and CDFW-approved botanist/biologist documenting onsite biological monitoring	DTSC	Ongoing field verification by DTSC or its designated contractor of Special-Status Plant mitigation requirements DTSC review of regular compliance reports demonstrating biological monitoring

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
branching phacelia, California screw moss, and Ventura County Locally Important Plants. The focused surveys shall be consistent with CDFW 2018 protocols, and conducted within 3 years prior to initial vegetation or ground disturbance during the appropriate blooming periods. The number of visits necessary to determine if special status plants are present can be determined by the CDFW-approved botanist/biologist based on factors such as geographic location, the natural communities present, and the weather patterns of the year(s) in which the focused plant surveys are conducted. During the focused surveys, individual special-status plants that are detected shall be marked or flagged for avoidance to the extent feasible. If it is anticipated that individual plants cannot be avoided, coordination with CDFW shall occur prior to disturbance to determine if species-specific mitigation is necessary. Depending on the sensitivity of the species, relocation, seed collection, habitat restoration (i.e., revegetation of suitable habitat), or other habitat improvement actions shall be identified in consultation with CDFW to mitigate impacts to individual plants that cannot be avoided. For any special-status species requiring mitigation, clean topsoil shall be preserved specifically for restoration purposes and not stored for greater than six months to minimize the potential for the soil to lose its beneficial qualities (e.g., soil microbials, beneficial fungi, and nutrients) and so that the topsoil does not degrade to the point that it is sterile with no future benefit to the biomass and restoration efforts. In addition, during vegetation or ground disturbance associated with remediation activities, a CDFW-approved biological monitor shall be onsite at the location of or in close proximity to special-status plants to establish avoidance areas and track any impacts to individual special-status plants.		Documentation to DTSC of coordination with CDFW Documentation to be provided to DTSC as part of regular compliance reports		
Mitigation Measure BIO-8: Vernal Pool Branchiopods. For areas where an AOC exception is applied and vernal pools are avoided, no further mitigation is required. If an AOC exception is not applied and vernal pool habitat is unavoidable, prior to any ground disturbance, a USFWS- and CDFW-approved biologist, retained by the RPs, under the direction of DTSC, shall conduct habitat suitability assessments to determine whether suitable habitat (i.e., vernal pools, depressions) is present within remediation areas. Focused surveys for Riverside fairy shrimp and vernal pool fairy shrimp shall be conducted within 2 years prior to remediation activities proposed within suitable habitat, in accordance with USFWS protocols. If focused surveys reveal Riverside fairy shrimp or vernal pool fairy shrimp occupying proposed remediation areas, no ground disturbance shall occur until the applicant consults with USFWS and CDFW regarding additional avoidance and minimization measures based upon the conditions at the time, or until the amount of take is determined and authorized in the USFWS's Biological Opinion. These measures shall be discussed with USFWS for consistency with conservation measures identified for Riverside fairy shrimp and vernal	Prior to ground disturbance	Written documentation of habitat suitability assessments Documentation of USFWS and CDFW consultation, if necessary Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating habitat suitability assessments results and USFWS and CDFW consultation, if necessary
	During remediation	Documentation of ongoing visual inspections of vernal pool avoidance by the RPs or their designee/contractor Documentation of implementation of any measures recommended as a result of USFWS and CDFW consultation Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating avoidance where applicable and implementation of any measures recommended as a result of USFWS and CDFW consultation Ongoing field verification by DTSC or its designated contractor of Vernal Pool mitigation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
pool fairy shrimp as a result of completed Endangered Species Act consultation for the project.				
Mitigation Measure BIO-9: Special-Status Invertebrates. Prior to any vegetation or ground disturbance associated with remediation activities, preconstruction surveys shall be conducted by a qualified biologist/expert,[2] retained by the RPs, under the direction of DTSC, within suitable habitat for the following species: Gertsch's socalchemmis spider, Santa Monica grasshopper, Zaca shoulderband snail, Ventura shoulderband snail, Matilija shoulderband snail, and walking stick. If any of these species are found during the preconstruction surveys, a qualified biologist shall, to the best of their ability, carefully catch and release the species out of the work area and to a safe area containing suitable habitat	Prior to any vegetation or ground disturbance	Written documentation of required preconstruction surveys and any actions taken by qualified biologists during the surveys Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating survey results and any actions taken
Mitigation Measure BIO-10: Western Spadefoot. To avoid potential impacts to western spadefoot, prior to any ground disturbance, a USFWS and CDFW-approved biologist, retained by the RPs, under direction of DTSC, shall conduct habitat suitability assessments within the project site to determine whether suitable habitat such as breeding pools/wetlands and nearby burrowing habitat is present. Based on the habitat assessments, suitable breeding pools and adjacent upland habitat shall be fenced or flagged by a biologist and avoided during the active and breeding season (October - May). If suitable breeding pools cannot be avoided during this season, consultation with USFWS and CDFW shall occur to determine appropriate measures to offset impacts to the species. Suitable mitigation shall include the creation of onsite breeding pool habitat. A Habitat Restoration and Monitoring Plan shall be prepared by the RPs under the direction of DTSC, with review and consultation with USFWS and CDFW prior to any disturbance to potential spadefoot breeding pools.	Prior to any ground disturbance	Written documentation of habitat suitability assessments and avoidance flagging Documentation of USFWS and CDFW coordination, if needed Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating habitat suitability assessments results and avoidance where applicable and implementation of any measures recommended as a result of USFWS and CDFW consultation, if feasible
	Prior to any disturbance to potential spadefoot breeding pools	Submittal of a Habitat Restoration and Monitoring Plan for DTSC approval in consultation with USFWS and CDFW Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS and CDFW	The Habitat Restoration and Monitoring Plan shall be reviewed and approved by DTSC in consultation with USFWS and CDFW DTSC review of regular compliance reports documenting approved Habitat Restoration and Monitoring Plan
	During and following remediation	Documentation of creation of onsite breeding pool habitat as outlined in the approved Habitat Restoration and Monitoring Plan Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS and CDFW	DTSC review of regular compliance reports documenting approved Habitat Restoration and Monitoring Plan Ongoing field verification by DTSC or its designated contractor of implementation of Habitat Restoration and Monitoring Plan
Mitigation Measure BIO-11: California Red-Legged Frog. A site assessment shall be performed by a qualified biologist to determine whether suitable habitat is present for California red-legged frog, in accordance with the USFWS's *Revised Guidance on Site Assessments and Field Surveys for the California Red-Legged Frog* (2005). If suitable habitat areas identified during the site assessment cannot be avoided, targeted protocol surveys shall be conducted within those habitat areas	Prior to remediation	Written documentation of site assessment to be submitted to DTSC Written documentation of targeted protocol surveys to be submitted to DTSC and USFWS, if required Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS	DTSC review of regular compliance reports documenting site assessment and targeted protocol survey results, if required

[2] A "qualified biologist/expert" is one who is familiar with the identification and ecology of the flora and fauna of the project area.

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
and the results submitted to USFWS in accordance with the guidance. Critical habitat and occupied habitat for California red-legged frog (CRLF) shall be avoided to the extent feasible. If an AOC exception is applied, no further mitigation is required. If an AOC exception is not applied and designated critical habitat for CRLF is unavoidable, cleanup activities within CRLF critical habitat shall be monitored for the presence of CRLF by a USFWS- and CDFW-approved biologist. Similarly, any work conducted within 300 feet from a detected occurrence of a CRLF shall be monitored by the approved biologist to avoid any inadvertent impacts, i.e., "take" of individuals. If the biologist detects CRLF within a work area, work activities shall cease and consultation with USFWS shall occur until USFWS has determined the appropriate mitigation strategy to avoid take, which may include the preparation and implementation of a USFWS-reviewed CLRF habitat restoration and monitoring plan. These measures shall be discussed with USFWS for consistency with conservation measures identified for this species as a result of completed Endangered Species Act consultation for the project.	During remediation activities within a California red-legged frog critical habitat area (If a California red-legged frog is identified, work activities shall cease and consultation with USFWS shall happen within 2 hours)	Technical memorandum by a USFWS and CDFW-approved biologist documenting onsite biological monitoring and avoidance, where applicable Documentation of USFWS consultation, if required Submittal of a Habitat Restoration and Monitoring Plan for DTSC approval in consultation with USFWS, if required Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS	DTSC review of regular compliance reports demonstrating implementation of biological monitoring, avoidance where applicable, and USFWS and CDFW consultation, if required Review and approval of a Habitat Restoration and Monitoring Plan by DTSC in consultation with USFWS, if required Ongoing field verification by DTSC or its designated contractor of implementation of CRLF mitigation requirements
Mitigation Measure BIO-12: Wildlife Monitoring. A USFWS- and CDFW-approved biologist, retained by RPs, under direction of DTSC, shall conduct wildlife monitoring during all initial ground-disturbing activities, such as vegetation removal and subsurface activities, including but not limited to, geotechnical drilling and excavation. The approved biologist shall also be present during work activities that are located within 100 feet from native habitats, such as chaparral, scrub and woodland communities, including riparian features. During initial ground disturbing activities, or where work will be conducted within 100 feet from native habitats, the USFWS- and CDFW-approved biologist, shall conduct an inspection at the beginning and end of the work day of any hazardous features (e.g., open trenches) that would trap, displace, injure, or kill wildlife. Prior to the end of daily cleanup activities, the biologist shall coordinate with the contractor(s) to ensure all trash is properly disposed of such that it would not be accessible to wildlife. The biologist shall monitor all open trenches and either make sure the trenches are closed by the end of the workday so no animals can enter the trench, or ensure ramps at a minimum 2:1 slope are installed in the open trench to allow animals to escape. For areas that contain suitable habitat for special-status wildlife, including species considered locally important by Ventura County (see Table 4.3-4), prior to and during all vegetation and ground-disturbing activities, a USFWS- and CDFW-approved biologist shall monitor work areas. If any special-status wildlife species are encountered during biological monitoring or by construction workers, work shall halt until the biologist determines appropriate actions to avoid and minimize harm to the species. California fully protected species that could present onsite (golden eagle, white-tailed kite, American peregrine falcon, California condor, and ringtail) shall be avoided. Other actions may include	During initial ground disturbing activities and work activities located within 100 feet from native habitats	Technical memorandum by a USFWS and CDFW-approved biologist documenting onsite biological monitoring Documentation of coordination with USFWS and/or CDFW, if needed Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS and CDFW	DTSC review of regular compliance reports documenting biological monitoring Ongoing field verification by DTSC or its designated contractor of implementation of wildlife monitoring mitigation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
relocation of the species for non-listed wildlife; however, relocation would not be allowed for any listed species without first obtaining take authorization from USFWS and/or CDFW. To the extent feasible, non-listed wildlife shall be relocated to a "release site" that is suitable habitat adjacent to the habitat where the species is found.				
Mitigation Measure BIO-13: Burrowing Owl. Prior to any ground disturbance of potential suitable breeding or wintering habitat for burrowing owl, a CDFW-approved biologist, retained by the RPs, under direction of DTSC, shall conduct a habitat assessment of the proposed remediation areas and reporting in accordance with the Staff Report on Burrowing Owl Mitigation (2012) to determine whether or not owls are present. Surveys shall be conducted throughout suitable habitat within 660 feet of cleanup areas to detect wintering and breeding owls, if present. If burrowing owls are detected, a Burrowing Owl Management Plan shall be prepared by the RPs under the direction of DTSC, with review and consultation with CDFW, prior to commencement of remediation. The Burrowing Owl Management Plan shall address owl specific minimization and avoidance measures, measures to protect occupied habitat, and mitigation for any impacted individuals. The Burrowing Owl Management Plan shall include mitigation for impacted occupied burrows at no less than a 3:1 ratio by installation of artificial burrows or as otherwise approved by CDFW. Prior to remediation, pre-construction surveys shall be conducted no more than 14 days prior to the commencement of work activities. Within 24 hours of cleanup activities involving ground or vegetation disturbance within suitable burrowing owl habitat, a CDFW-approved biologist shall conduct a final survey to check for signs of burrowing owl. If breeding or wintering owls are detected, burrowing owls and active burrows shall be avoided and the protective buffers established in the Burrowing Owl Management Plan shall be implemented. Destruction of unoccupied wintering burrows is considered a temporary impact, and suitable wintering habitat shall be restored to pre-project or better conditions in upland areas. If an occupied burrow is impacted by project activities, mitigation for that impact shall be implemented in accordance with the Burrowing Owl Management Plan as mentioned in the prior paragraphs.	Habitat sustainability assessments shall be conducted prior to any ground disturbance of potential suitable breeding or wintering habitat for burrowing owl If burrowing owls are detected, a Burrowing Owl Management Plan shall be prepared, and DTSC shall consult with CDFW prior to commencement of remediation Pre-construction surveys shall be conducted no more than 14 days prior to the commencement of work activities Within 24 hours of cleanup activities involving ground or vegetation disturbance within suitable burrowing owl habitat During remediation	Written documentation of habitat suitability assessments Submittal of a Burrowing Owl Management Plan for DTSC approval in consultation with CDFW, if required Documentation of coordination with CDFW Written documentation of required preconstruction surveys Documentation to be provided to DTSC as part of regular compliance reports Documentation of final survey to check for signs of burrowing owls by a CDFW-approved biologist Documentation of implementation of approved Burrowing Owl Management Plan, if required Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW DTSC	DTSC review of regular compliance reports documenting habitat suitability assessments and preconstruction survey results The Burrowing Owl Management Plan shall be reviewed and approved by DTSC in consultation with CDFW, if needed DTSC review of regular compliance reports demonstrating implementation of the approved Burrowing Owl Management Plan, if required Ongoing field verification by DTSC or its designated contractor of implementation of Burrowing Owl mitigation requirements
Mitigation Measure BIO-14: Least Bell's Vireo. To avoid impacts to nesting least Bell's vireo, blasting activities shall occur between September 16 and December 31, outside of the avian nesting season. Other work activities within 500 feet of suitable nesting habitat shall be timed to avoid the season when nests may be active for this species (March 15 to September 15). If avoidance of work activities within this time period is not feasible, a USFWS protocol surveys for least Bell's vireo shall be conducted within suitable nesting habitat the season prior to initiation of work activities to determine their presence or absence within 500 feet of proposed work limits. In accordance with the USFWS	USFWS protocol surveys for least Bell's vireo shall be conducted, 10 days apart during the period of April 10 to July 31, prior to initiation of work activities during the nesting season During the nesting season preconstruction clearance survey shall be performed within 7 days prior to work activities	Written documentation of USFWS protocol surveys and focused surveys to be submitted to USFWS and DTSC Documentation of USFWS consultation, if required Documentation of preconstruction clearance survey by a qualified biologist, if required	DTSC in consultation with USFWS	DTSC review of regular compliance reports demonstrating USFWS protocol survey results, USFWS consultation, and preconstruction clearance survey results, if required

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
survey protocol, surveys shall consist of eight site visits conducted 10 days apart during the period of April 10 to July 31. The results shall be submitted in a report to the USFWS.		Documentation to be provided to DTSC as part of regular compliance reports		
If the focused surveys do not indicate the presence of least Bell's vireo, no further mitigation is required. A negative finding is considered valid until the following breeding season. Additional surveys shall be required each year that work is conducted in least Bell's vireo breeding habitat during the breeding season. If focused surveys indicate the presence of least Bell's vireo, formal Endangered Species Act consultation with USFWS shall occur prior to disturbance of this species or its habitat. If occupied habitat and/or nesting individuals are determined to be present based on the focused survey, and work cannot be avoided during the nesting season, a preconstruction clearance survey shall be performed by a qualified biologist within 7 days prior to work activities to determine the approximate location of nesting territories within 500 feet of work areas. Surveys shall be conducted by a biologist approved by the USFWS and CDFW for conducting least Bell's vireo nest surveys, or by a biologist with least Bell's vireo survey experience, so long as the nest is not approached and/or disturbed. If a nest is detected or active breeding is determined, work shall halt within 500 feet of the nesting territory, and the area shall be monitored on a weekly basis until a qualified biologist determines the nest is no longer active and the young have fledged. These measures shall be discussed with USFWS for consistency with conservation measures identified for this species as a result of completed Endangered Species Act consultation for the project.	During remediation	Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of Least Bell's Vireo mitigation requirements DTSC review of regular compliance reports demonstrating survey results and biological monitoring, if required
Mitigation Measure BIO-15: Coastal California Gnatcatcher. To avoid impacts to coastal California gnatcatcher, blasting activities shall occur between September 16 and December 31, outside of the avian nesting season. Other work activities within 500 feet of suitable nesting habitat shall be timed to avoid the breeding season for this species (February 15 to August 30). If avoidance of work activities within this time period is not feasible, focused surveys for coastal California gnatcatcher shall be conducted within suitable nesting habitat to determine their presence or absence within 500 feet of work limits. A USFWS- and CDFW-approved biologist shall conduct USFWS-protocol surveys for coastal California gnatcatcher during one of the timeframes below, and within 2 years prior to remediation activities proposed within suitable nesting habitat. a. Minimum of 6 surveys at least 1 week apart between March 15 and June 30 b. Minimum of 9 surveys conducted at least 2 weeks apart between July 1 and March 14 If the focused surveys do not indicate the presence of coastal California gnatcatcher, no further mitigation is required. If occupied habitat and/or nesting individuals are determined to be present based on the focused surveys, and work cannot be avoided during the nesting season, a preconstruction clearance survey shall be	USFWS-protocol surveys for coastal California gnatcatcher shall be conducted during one of the following timeframes, and within 2 years prior to remediation activities proposed within suitable nesting habitat during breeding season. a. Minimum of six surveys at least 1 week apart between March 15 and June 30 b. Minimum of nine surveys conducted at least 2 weeks apart between July 1 and March 14 The preconstruction clearance survey shall be performed within 7 days prior to work activities	Written documentation of USFWS-protocol surveys to be submitted to USFWS and DTSC Documentation of USFWS consultation, if required Written documentation of the preconstruction clearance survey by qualified biologist, if required Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS	DTSC review of regular compliance reports demonstrating USFWS protocol survey results, USFWS consultation, and preconstruction clearance survey results, if required
	During remediation	Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of Coastal California Gnatcatcher mitigation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
performed by a USFWS- and CDFW-approved biologist within 7 days prior to work activities to determine the location of any nests within a minimum distance of 500 feet from proposed work areas. If a nest is detected, work shall halt within 500 feet of the nest, and the nest shall be monitored on a weekly basis by a qualified biologist familiar with coastal California gnatcatcher, until the biologist determines the nest is no longer active and the young have fledged. These measures shall be discussed with USFWS for consistency with conservation measures identified for this species as a result of completed Endangered Species Act consultation for the project.				DTSC review of regular compliance reports documenting biological monitoring, if required
Mitigation Measure BIO-16: Avian Protection Plan. A site-wide avian protection plan shall be prepared by a qualified biologist that identifies avoidance and minimization measures for nesting birds, eagles, raptors, and special-status bird species. At a minimum, the avian protection plan shall include the following and shall be reviewed by USFWS or CDFW prior to implementation of approved cleanup decision documents: a. Identification of habitat especially valuable for migratory birds and eagles. b. Blasting activities shall occur between September 16 and December 31, outside of the avian nesting season, to avoid potential noise-related impacts to nesting avian species. c. If the nesting season cannot be avoided and remediation or vegetation removal occurs between March 1 to September 15 (January 1 to July 31 for raptors), the RPs, under the direction of DTSC, shall implement the following measures to avoid and minimize impacts to nesting birds and raptors: • During the avian breeding season, a qualified biologist shall conduct a preconstruction avian nesting survey no more than 7 days prior to vegetation disturbance or site clearing. Surveys need not be conducted for the entire proposed remediation areas at one time; they may be phased so that surveys occur shortly before a portion of the site is disturbed. If remediation begins in the non-breeding season and proceeds continuously into the breeding season, no surveys are required. However, if there is a break of 7 days or more in cleanup activities during the breeding season, a new nesting bird survey shall be conducted before remediation begins again. • The preconstruction survey shall cover all reasonably potential nesting locations on and within 300 feet of the proposed remediation areas—this includes buildings and infrastructure, and areas that would be occupied by ground-nesting species such as killdeer. A 500-foot radius shall be surveyed in areas containing suitable habitat for nesting raptors, such as trees, utility poles, rock crevices, and cliffs. • If an active nest is found during the preconstruction avian nesting survey, a qualified biologist shall implement a 300-foot minimum avoidance buffer for all passerine birds and 500-foot minimum	Prior to remediation Preconstruction avian nesting survey surveys shall be conducted no more than 7 days prior to vegetation disturbance or site clearing during breeding season. If there is a break of 7 days or more in cleanup activities during the breeding season, a new nesting bird survey shall be conducted before remediation resumes During remediation	Submittal of a site-wide Avian Protection Plan for DTSC approval in consultation with USFWS or CDFW Written documentation of preconstruction avian nesting survey by an approved biologist Documentation of USFWS or CDFW consultation, if required Documentation to be provided to DTSC as part of regular compliance reports Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with USFWS or CDFW DTSC	The Avian Protection Plan shall be reviewed and approved by DTSC in consultation with USFWS or CDFW DTSC review of regular compliance reports documenting approved Avian Protection Plan and preconstruction survey results Ongoing field verification by DTSC or its designated contractor of implementation of the Avian Protection Plan DTSC review of regular compliance reports documenting approved Avian Protection Plan

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
avoidance buffer for all raptor species. The nest site area shall not be disturbed until the nest becomes inactive, the young have fledged, the young are no longer being fed by the parents, the young have left the area, and the young will no longer be impacted by the project. Buffer areas may be increased if any endangered, threatened, CDFW fully protected, or CDFW species of special concern are identified during protocol or preconstruction surveys, based on consultation with USFWS or CDFW. Buffer areas for all other non-listed nesting birds or raptors may be reduced at the discretion of the qualified biologist depending on the sensitivity of the nesting species. • If the nest(s) are found in an area where ground disturbance is scheduled to occur, the project operator shall avoid the area either by delaying ground disturbance in the area until a qualified biologist has determined that the birds have fledged and are no longer reliant upon the nest or parental care for survival, or by relocating the project component(s) to avoid the area.				
Mitigation Measure BIO-17: Ringtail. Prior to any vegetation, ground disturbance, or blasting activities, a CDFW-approved biologist, retained by RPs, under direction of DTSC, shall locate and map all potential ringtail suitable caves and crevices in outcrop areas, and any sign of presence, such as scat or tracks, located within a 500-foot buffer of work area limits, or as determined in consultation with CDFW. This habitat assessment shall include searches for reptile hibernacula, bat roosting and colony sites, bird nesting areas, and dens utilized by San Diego desert woodrat. Once suitable dens are located, a minimum 100-foot no work buffer should be established, or an appropriate buffer established in consultation with CDFW. All work activities shall be conducted during daylight hours. If remediation activities must occur within the 100-foot buffer, a CDFW-approved biologist shall monitor the den to ensure there is no sign of ringtail.	Prior to any vegetation or ground disturbance	Written documentation of habitat suitability assessments Documentation of CDFW consultation Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	DTSC review of regular compliance reports documenting habitat suitability assessment results and CDFW consultation
	During remediation	Technical memorandum by a CDFW-approved biologist documenting onsite biological monitoring Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting biological monitoring Ongoing field verification by DTSC or its designated contractor of implementation of Ringtail mitigation requirements
Mitigation Measure BIO-18: Special-Status Bats. To mitigate for potential impacts to special-status bats and maternity roosts during cleanup activities, the following measures shall be implemented prior to the commencement of remediation activities: a. *Avoidance of Maternity Roosts*. Blasting activities shall occur outside of the maternity roosting season. If other work activities occur during the maternity roosting season (generally defined as March 1 through August 31), a qualified biologist, retained by RPs, under direction of DTSC, shall conduct a habitat assessment for potential bat maternity roosts (i.e., tree cavities, buildings, rock outcrops and crevices). If maternity roosts or bat roost sites are identified during the habitat assessment, an appropriate no-disturbance buffer shall be established at the discretion of a qualified biologist, based on the sensitivity of the bat species. If work within the buffer is deemed	Prior to remediation	Written documentation of habitat suitability assessments prior to work occurring during roosting season Written documentation of required acoustic surveys and exit count surveys by an approved biologist be provided to CDFW Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	DTSC review of regular compliance reports documenting habitat suitability assessments results and bat survey field data sheets
	During remediation	Technical memorandum by a qualified biologist documenting onsite biological monitoring	DTSC in consultation with CDFW	DTSC review of regular compliance reports documenting biological monitoring and any actions taken Ongoing field verification by DTSC or its designated contractor of

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
necessary, a qualified biologist shall monitor work activities to ensure no disturbance to the roost(s). b. *Exclusion Outside of Maternity Roosting Season*. If bats are determined by a qualified biologist to be roosting within cleanup areas, bats shall be humanely evicted and excluded. The humane eviction/exclusion shall be conducted in the fall (September or October) preceding work activities that affect roosting bats. Exclusion in the fall is recommended to avoid impacts to hibernating bats or a maternity roost (typically April through August in southern California) when flightless young are present. c. To protect roosting bats, a combination of acoustic surveys of habitat around infrastructure inspection, and exit counts shall be used to survey the area that may be directly or indirectly impacted by the project. As bats may utilize dense tree canopies, snags, rock crevices or built structures over creeks/water, these habitat types should be specifically surveyed. Foraging areas should also be identified and specific flight routes to those foraging areas as well. Bats shall be identified to the most specific taxonomic level possible, and roosts shall be evaluated to determine their size and significance. Bat surveys shall include: (1) the exact location of all roosting sites (location shall be adequately described and drawn on a map); (2) the number of bats present at the time of visit (count or estimate); (3) each species of bat present shall be named (include how the species was identified); (4) the location, amount, distribution and age of all bat droppings shall be described and pinpointed on a map; (5) the type of roost; night roost (rest at night while out feeding) versus a day roost (maternity colony) must also be clearly stated; and (6) all survey results, including field data sheets should be provided to CDFW. During installation of humane eviction/exclusion devices, each crevice shall be inspected using flashlights or fiber optic scopes for the presence of day-roosting bats. At crevices where the absence of day-roosting bats is confirmed, the crevices immediately shall be sealed using materials such as foam backer rod or pipe insulation secured with adhesive to prevent bats from entering and using the crevices. At crevices where bats are visibly present or where absence cannot be confirmed, humane eviction devices shall be installed that would allow the bats to exit the crevice but prevent them from returning. The qualified biologist performing the humane eviction shall determine the exact type of eviction device to be installed and exclusionary device used. The eviction device shall remain in place for at least 14 days following installation to allow sufficient time for all the bats to vacate the crevice. After the exclusionary period, the eviction device shall be removed and exclusion device installed. The exclusion device shall remain in place for the duration of work activities, and shall be inspected weekly by a qualified biologist. All aspects of the humane eviction/exclusion of bats shall be supervised directly and monitored by a qualified biologist approved by CDFW. Following completion of activities that would impact roosting bats, the exclusion devices shall be removed by the contractor		Documentation to be provided to DTSC as part of regular compliance reports		implementation of Special Status Bat mitigation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
(under supervision of the qualified biologist) to allow bats to return to the roost crevices.				
Mitigation Measure BIO-19: Sensitive Habitats. For areas where an AOC exception is applied and sensitive habitats are avoided, no further mitigation is required. If an AOC exception is not applied and sensitive habitat is unavoidable, prior to vegetation removal or disturbance, a qualified biologist, retained by the RPs, under the direction of DTSC, shall characterize and map the habitats within cleanup areas in accordance with current CDFW vegetation mapping standards. Adjoining habitat areas shall also be included in the assessment where project activities would lead to direct or indirect impacts offsite, and impacts to these areas shall be quantified, so that mitigation areas can be determined. Where imported soils are used for backfill of impacted areas, USFWS and CDFW shall be consulted to determine the best available source of clean backfill and to identify any necessary soil amendments. In addition, appropriate personnel shall be consulted for evaluating current soil properties for any proposed backfill sources. Backfill shall not be sourced from a location that results in ecological impacts, such as sterile soils or soils harboring noxious weed seeds, and the source of backfill shall be selected in consultation with USFWS and CDFW during review and prior to DTSC's approval of applicable draft cleanup decision documents. Exhibit 14 of the 2022 Settlement Agreement outlines the process for DTSC decision-making regarding backfill for Boeing areas of responsibility. All backfill decisions shall ensure protection of human health and the environment. In addition, during vegetation or ground disturbance associated with remediation activities, a CDFW-approved biological monitor shall be onsite to establish and mark limits of sensitive habitats to be avoided to the extent feasible. The biological monitor shall document and quantify any impacts to sensitive habitats to determine the extent and type of habitats required for restoration, as needed for preparation and implementation of a site-specific revegetation plan in accordance with Mitigation Measure BIO-6 (Revegetation Plan). Soil stabilization techniques and BMP's shall also be implemented in accordance with Mitigation Measure BIO-6. Habitat mitigation acreage requirements shall be determined in consultation with CDFW and USFWS prior to any ground disturbances, and shall be indicated in the Revegetation Plan (Mitigation Measure BIO-6). For unavoidable impacts to sensitive habitats that are also jurisdictional wetlands or waters, mitigation requirements shall be developed in accordance with Mitigation Measure BIO-21 (Jurisdictional Wetlands and Waters). Remediation activities within oak woodlands shall be avoided to the extent feasible. Oak woodland mitigation requirements shall be implemented in consultation with the Ventura County Resource Management Agency Planning Division prior to disturbance of oak woodlands. Consistent with state legislation (see SB 1334), the County allows that no more than 50 percent of the mitigation for losses to oak	Prior to remediation Habitat suitability assessments shall be conducted prior to vegetation removal or disturbance Consultation with the Ventura County Resource Management Agency Planning Division shall occur prior to disturbance of oak woodlands	Written documentation of habitat suitability assessments Documentation of consultation with the Ventura County Resource Management Agency Planning Division Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating habitat suitability assessments results and Ventura County Resource Management Agency Planning Division consultation
	During remediation	Technical memorandum by an approved biologist documenting onsite biological monitoring and implementation of the approved Revegetation Plan Documentation of oak woodland mitigation implementation in consultation with the Ventura County Resource Management Agency Planning Division and in partnership with a conservation organization or a CDFW-approved mitigation bank, if required Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports demonstrating biological monitoring and implementation of the approved Revegetation Plan and implementation of oak woodland mitigation requirements, if required Ongoing field verification by DTSC or its designated contractor of implementation of Sensitive Habitat mitigation requirements and Restoration Plan implementation

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
woodlands to be met through tree planting; thus, at least 50 percent of the mitigation to oak woodland habitat shall be in the form of habitat protection (acquisition of intact oak woodland) and/or restoration, conducted in partnership with a conservation organization or a CDFW-approved mitigation bank. Any remaining percentage of oak woodland mitigation required, if not met through habitat protection/restoration, shall be met through oak tree plantings based on the cross-sectional area of impacted oak trees. In accordance with the Ventura County Oak Woodland Management Plan, in the non-coastal zone, tree planting of protected trees (including oak trees) is based on a 1:1 ratio of the cross-sectional area of impacted trees (and not based on the number of impacted trees). Therefore, if the tree planting mitigation option is chosen in conjunction with habitat protection/restoration, oak trees with a total cross-sectional area equal to that of all oak trees removed shall be provided as oak woodland mitigation.				
Mitigation Measure BIO-20: Seed Collection and Cuttings for Habitat Restoration. Prior to the initiation of remediation activities, onsite seed collection of native plant species shall be initiated at the project site and nearby vicinity for onsite habitat restoration purposes and, if appropriate, for rare plant mitigation. The seed shall be collected during the appropriate period for the species (e.g., May to June for Catalina mariposa lily), and stored onsite for habitat restoration. In addition, cuttings of native plant species that are capable of reproducing through vegetative propagation shall be collected. Seed collection and cutting methods, volumes, and timing shall be specified in the site-specific revegetation plan. On-site plant nursery for the propagation of materials to be used in revegetation is recommended by CDFW in order to have plant materials ready for revegetation at the needed times.	Prior to remediation	Submittal of a Revegetation Plan for DTSC approval in consultation with CDFW approval Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	The Revegetation Plan shall be reviewed and approved by DTSC in consultation with CDFW DTSC review of regular compliance reports documenting approved Revegetation Plan
Mitigation Measure BIO-21: Jurisdictional Wetlands and Waters. Prior to any disturbance of aquatic, wetland, or riparian habitat, a jurisdictional delineation of wetlands and water courses shall be conducted for the purposes of identifying features or habitats that would be impacted by cleanup activities and subject to the jurisdiction of the US ACE, LARWQCB, and CDFW. The findings shall be included in a jurisdictional delineation report suitable for submittal to these agencies for obtaining a Section 404 Clean Water Act permit (CWA), Section 401 Water Quality Certification (WQC), Waste Discharge Requirements (WDR), and/or streambed alteration agreement (SAA). Prior to activities that would result in the discharge of fill or dredged material within waters of the U.S., a Section 404 CWA permit shall be obtained from the US ACE and a Section 401 WQC shall be obtained from the LARWQCB. Prior to activities within streams, ponds, seeps or riparian habitat, or use of material from a streambed, the project applicant shall obtain a WDR for impacts to waters not subject to the CWA, provide written notification to CDFW pursuant to Section 1602 of	Prior to any disturbance of aquatic, wetland, or riparian habitat	Submittal of a Jurisdictional Delineation Report for DTSC approval in consultation with US ACE, LARWQCB, and CDFW Documentation of approved Section 404 Clean Water Act permit, Section 401 Water Quality Certification, Waste Discharge Requirements, and/or streambed alteration agreement to be submitted to DTSC Submittal of a Compensatory Mitigation Plan for US ACE, LARWQCB, and/or CDFW review Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with US ACE, LARWQCB, and CDFW	The Jurisdictional Delineation Report and Compensatory Mitigation Plan shall be reviewed and approved by DTSC in consultation with US ACE, LARWQCB, and CDFW DTSC review of regular compliance reports documenting approval of applicable permits and Compensatory Mitigation Plan

Mitigation Measure	Implementation		Enforcement	
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the Fish and Game Code, ensure the notification is complete as provided in Section 1602, and comply with the terms of conditions of any agreement CDFW may issue in response to the notification. The RP shall also consult with LARWQCB and CDFW regarding any indirect effects to aquatic or riparian habitats resulting from groundwater pumping, and such effects shall be taken into account when compensatory mitigation to these habitats are agreed upon between the applicant and regulatory agencies during the permitting process. Based on the findings of the jurisdictional delineation report and agency verification of the extent of jurisdictional resources, riparian vegetation, wetlands, and waters shall be avoided to the extent feasible, and appropriate setbacks shall be marked by a biologist from the edge of jurisdictional waters or riparian vegetation (whichever is wider) to maintain riparian and aquatic functions and values. In areas where avoidance of stream channels or riparian vegetation is infeasible, impacts shall be minimized and the site slopes and hydrology of remediated areas shall be restored to pre-remediation conditions to the extent possible. If impacts to wetlands are unavoidable, compensatory mitigation shall ensure no net loss of wetlands, in accordance with permit conditions. A compensatory mitigation plan addressing temporary and permanent impacts to jurisdictional wetlands and waters shall be prepared prior to disturbance. The plan shall be developed in consultation with the US ACE, LARWQCB, and/or CDFW during the permitting process. It shall include a plan view graphic showing the target mitigation activities, a seeding and planting plan (species palette and application techniques), and a monitoring and reporting plan with performance standards and success criteria. The plan shall include a recommended timeline for mitigation activities and the establishment of seeded native species. The mitigation work shall begin in the same construction season as the initiation of grading within wetlands or aquatic habitats, and mitigation site grading shall be completed within 1 year of initiation (or as otherwise determined by resource agency permits). All established/enhanced habitats shall be protected in perpetuity within SSFL, subject to regular maintenance activities, if necessary, and appropriate to permitting agencies. Alternately, compensatory mitigation can be achieved through purchasing credits at a US ACE- or CDFW-approved mitigation bank.	During and following remediation	Documentation of the approved Compensatory Mitigation Plan implementation Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting approved Compensatory Mitigation Plan Ongoing field verification by DTSC or its designated contractor of implementation of Compensatory Mitigation Plan
Mitigation Measure BIO-22: Wildlife Movement. To minimize potential impacts to terrestrial wildlife species and wildlife movement, the following measures shall be implemented: a. The cleanup activities shall be staggered across the site, limiting disturbances to specific locations that do not span the entire site, to provide refuge for wildlife that may use the site as a corridor. Staggering of cleanup activities shall be coordinated in consultation with CDFW and/or NPS to ensure wildlife movement is not obstructed during cleanup activities. A buffer zone with minimal cleanup activity between active work areas and the corridor shall be maintained to	During remediation	Technical memorandum by a qualified biologist documenting onsite biological monitoring and compliance with Wildlife Movement mitigation requirements Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting biological monitoring and compliance with Wildlife Movement mitigation requirements Ongoing field verification by DTSC or its designated contractor of implementation of Wildlife Movement mitigation requirements

Mitigation Measure	Implementation		Enforcement	
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provide temporary refuge habitat for wildlife during cleanup, particularly overnight when species are likely to be migrating. b. To the greatest extent possible, disruptive cleanup activities (e.g., blasting) shall be scheduled outside of sensitive wildlife breeding, nesting, or birthing seasons for species potentially using the corridor. While the target timeframe for blasting activities is September 16 – December 31, surveys will be required prior to the start of activities regardless of when they are scheduled to occur. c. If any terrestrial wildlife species that have entered the work area and could be harmed by work activities are encountered during biological monitoring or by construction workers, work shall halt in that work area until a qualified biologist, retained by the RPs, under the direction of DTSC, determines appropriate actions to avoid harm to the species. Wildlife shall be allowed to leave the work area before work may resume, or a qualified biologist may relocate non-listed species to areas of suitable habitat that would not be disturbed. d. Nighttime work shall be avoided as much as possible. If nighttime remediation is necessary, all lighting shall be broadcast away from any wildlife movement areas, including areas that support wildlife movement such as ephemeral drainages and closed tree canopies, to the greatest extent practical. Any nighttime lighting shall be shielded downward as to avoid light spillage into the adjacent wildlife corridor to the south. e. To the extent practicable, truck travel on access roads and within cleanup areas should avoid dawn and dusk when wildlife activity is high. f. During rain events, work shall not occur within 50 feet of aquatic habitats or within a suitable buffer as determined by a qualified biologist. g. Speeds shall be limited to 25 mph or less within the proposed remediation areas and along access roads.				
Mitigation Measure BIO-23: Tree Protection. The following measures shall be implemented for protected trees that would be removed, require trimming, or if grading/excavation would occur within the root zone: a. Prior to any tree disturbance or ground-disturbing activities, the RPs, under the direction of DTSC, shall develop and implement a Tree Management and Preservation Plan under the direction of a certified arborist, which shall be reviewed by Ventura County Resource Management Agency and CDFW. The goal of the plan shall be to offset tree impacts through a sustainable, customized plan that is suitable for the site's unique opportunities for tree preservation, enhancement, and establishment. Offsets for the loss of Protected Trees can include transplantation, planting of new Protected Trees, dedication of land containing Protected Trees, or a financial contribution to the County's Tree Mitigation Fund. The plan shall	Prior to and during tree disturbance or ground-disturbing activities	Submittal of a Tree Management and Preservation Plan for DTSC approval, in consultation with Ventura County Resource Management Agency, and CDFW Technical memorandum by a certified arborist documenting onsite tree monitoring of the health of Protected Trees Documentation to be provided to DTSC as part of regular compliance reports	DTSC	The Tree Management and Preservation Plan shall be reviewed and approved by DTSC, in consultation with Ventura County Resource Management Agency and CDFW DTSC review of regular compliance reports documenting approved Tree Management and Preservation Plan and tree monitoring Ongoing field verification by DTSC or its designated contractor of implementation of Tree Management and Preservation Plan mitigation requirements and tree monitoring

Mitigation Measure	Implementation		Enforcement	
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identify trees protected by Ventura County, including oak (*Quercus* sp.), sycamore (*Platanus racemosa*), historical and heritage trees or special-status trees (e.g., southern California black walnut) that would be impacted within or adjacent to remediation areas, as well as those located outside of the project footprint that would be preserved. The plan shall define direct and indirect impacts and include mitigation options within cleanup areas, as well as outside of cleanup areas, such as tree relocation or replacement. The plan shall identify appropriate reference site(s) and the locations of mitigation areas, and shall specify the RPs, funding sources, restoration areas, performance standards and success criteria based on reference site(s). In addition, the Plan shall incorporate procedures for monitoring the health of Protected Trees that are encroached upon by remediation activity or development. This monitoring should include an evaluation of the tree's health by a certified arborist before commencement of remediation and for a period of at least 5 years after encroachment and disturbance activities cease. The Plan shall include a minimum 5-year maintenance and monitoring period for new Protected Trees that are planted, including adaptive management strategies and regulatory authorities.	Tree monitoring shall occur for a minimum of 5 years for new Protected Trees; a minimum of 1 year for all oak trees encroached by subsurface cleanup activities involving excavation or grading; and a minimum of 2 years for permanent encroachments to oak trees such as placement of fill (i.e., pavement)	Technical memorandum by a certified arborist documenting compliance with the Tree Management and Preservation Plan and onsite tree monitoring of the health of Protected Trees Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting Tree Management and Preservation Plan and tree monitoring Ongoing field verification by DTSC or its designated contractor of implementation of the Tree Management and Preservation Plan and tree monitoring
b. RPs, under the direction of DTSC, can mitigate trees within another RP's area if both parties agree, and such arrangements shall also be specified in both parties' tree management and preservation plans. Performance measures shall include 100 percent survival of trees relocated or replaced during the plant establishment period.				
c. Protection measures for protected trees include fencing and protection of oak trees adjacent to remediation areas. In addition, placement of fill, storage of equipment, and grading shall be prohibited within the protective zone (minimum of 5 feet from the dripline, or 15 feet from the trunk of the tree, whichever distance is greater) of any tree proposed for preservation. Grade changes near the protective zones of oak trees shall be limited to the greatest extent feasible. Retaining walls shall be used to protect oaks proposed for preservation from surrounding cut and fill, and no surfaces shall be placed within a 6-foot radius of oak tree trunks; any retaining walls shall be placed outside of the protective zone of the oak tree to be preserved. Any encroachment within the specified limits above shall require monitoring by a qualified arborist, so that measures can be implemented to avoid any long-term impacts to the tree, such a specific root pruning techniques if any minor roots would be disturbed, or to monitor branch pruning to allow for necessary equipment access.				
d. All oak trees encroached by subsurface cleanup activities involving excavation or grading shall be monitored for a minimum of 1 year, and permanent encroachments to oak trees such as placement of fill (i.e., pavement) shall be monitored for a minimum of 2 years to assess the health of the tree and identify signs of stress that occurred as a result of the encroachment. If the health of the protected tree is determined to be in decline as a result of the project's disturbance				

Mitigation Measure	Implementation		Enforcement	
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within the tree's protective zone, the tree shall be replaced in accordance with the paragraph above.				
Mitigation Measure BIO-24: Crotch's Bumble Bee. For remediation areas that have suitable foraging or nesting habitat for the Crotch's Bumble Bee (CBB), a CDFW-approved biologist shall conduct protocol surveys to determine presence/absence. If the CBB will be captured or handled, a Scientific Collecting Permit (SCP) from CDFW must be obtained by the CDFW approved biologist. In addition to protocol surveys, if the CBB will not be captured or handled, the CDFW-approved biologist could photograph the bees for identification purposes and may use the assistance of a taxonomist to confirm the species. A minimum of three surveys shall be conducted during peak flying season when the species is most likely to be detected above ground, between April and August, during the colony active period (Thorp et al., 1983; CDFW, 2023). The CDFW-approved biologist shall utilize a non-lethal survey methodology and obtain appropriate photo vouchers for species confirmation (CBBA, 2023). During the surveys, the CDFW-approved biologist shall flag inactive small mammal burrows and other potential nest sites to reduce the risk of take. Survey results, including negative findings, shall be submitted to CDFW prior to obtaining appropriate permits. At minimum, a survey report shall provide the following: a. A description and map of the survey area, focusing on areas that could provide suitable habitat for the CBB. CDFW recommends the map show surveyor(s) track lines to document that the entire site was covered during field surveys. b. Field survey conditions that include name(s) of the CDFW-approved biologist and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. c. Map(s) showing the location of nests/colonies. d. A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). If the CBB is detected, the CDFW-approved biologist shall identify the location of all nests within and adjacent to the project site. A 15-meter (~ 50 feet) no disturbance buffer zone shall be established around any identified nest(s) to reduce the risk of disturbance or accidental take. The CDFW-approved biologist shall expand the buffer zone as necessary to prevent disturbance or take. These no disturbance buffer zones could be considered AOC exception areas and avoided. If the CBB is detected and impacts to it cannot be feasibly avoided, RPs shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & Game Code, § 2080 et seq). Appropriate	Prior to vegetation or ground disturbance within suitable habitat for CBB and during the peak flying season (April - August) a. A minimum of 3 surveys shall be conducted during peak flying season If CBB is identified during work activities work shall halt until the approved biologist determines appropriate actions	Technical memorandum by a CDFW-approved biologist documenting focused survey Written documentation of survey results, including photo vouchers and/or negative findings, by an approved biologist be provided to CDFW Documentation of CDFW consultation, as needed RPs to apply for applicable permits, as needed Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	DTSC review of regular compliance reports demonstrating onsite focused surveys and CDFW consultation, as well as any approved permits Ongoing field verification by DTSC or its designated contractor of implementation of CBB mitigation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
authorization from CDFW under CESA may include an Incidental Take Permit (ITP), among other options [Fish & Game Code, § 2081, subds. (b) and (c)]. Any suitable habitat associated with the CBB that would be removed or damaged by individual projects shall be replaced at no less than 1:1. Suitable habitat shall be replaced as close to its original location as is feasible. If active CBB nests have been identified and suitable habitat cannot be replaced within 200 meters (~ 600 feet) of their original location, suitable habitat shall be planted in the most centrally available location relative to identified nests. This location shall be no more than 1.5 kilometers (~ 4,900 feet) from any identified nest. Replaced suitable habitat may be split into multiple patches to meet distance requirements for multiple nests. These suitable habitats shall be maintained in perpetuity and replanted and managed as needed to ensure the habitat is preserved.				
Mitigation Measure BIO-25: Mountain Lion Natal Den Survey and Avoidance. Within one year prior to implementation of a cleanup activity, a CDFW-approved biologist knowledgeable of mountain lion species ecology shall survey and map the areas within the remediation footprint and a surrounding survey buffer that may provide potential natal den habitat (i.e., caves, other natural cavities, thickets in brush and timber for cover and denning). If potential natal dens are identified during surveys, remote, no-glow infrared wildlife cameras shall be installed outside the den area to determine occupancy. Wildlife cameras shall be set up for one week prior to remediation activities or as determined appropriate by the qualified biologist to document natal den occupancy. Survey results from the remote wildlife cameras, including negative findings, shall be submitted to CDFW. If occupied natal dens are identified, no work shall occur within a 2,000-foot buffer from a natal den, unless a qualified biologist consults with CDFW to determine the appropriate course of action, including any buffer modification, in order to not adversely affect the successful rearing of the cubs. No remediation activities or human intrusion shall occur within the established setback until the cubs have been successfully reared or the cats have left the area. No rodenticides or second-generation anticoagulant rodenticides shall be permitted for use during project activities.	Within 1 year prior to remediation If mountain lion natal dens are identified during work activities work shall halt until the approved biologist determines appropriate actions	Technical memorandum by a CDFW-approved biologist documenting focused survey Written documentation of survey results, including survey results from wildlife cameras and/or negative findings, by an approved biologist be provided to CDFW Documentation of CDFW consultation, as needed Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with CDFW	DTSC review of regular compliance reports demonstrating onsite surveys and CDFW consultation Ongoing field verification by DTSC or its designated contractor of implementation of mountain lion natal den mitigation requirements
Cultural Resources				
Mitigation Measure CUL-1: Cultural Resources Personnel Professional Qualifications Standard. Cultural resources consulting staff shall meet, or be under the direct supervision of an individual meeting, the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (SOI) (codified in 36 CFR Part 61; 48 FR 44739).	Prior to, during, and following remediation	Language to be included in contractor scopes of work and agreements Written verification of consultant's professional qualifications, this can be in the form of a certified statement indicating the project archaeologist is qualified pursuant to federal qualification requirements or copies of	DTSC	DTSC review of regular compliance reports documenting consultant's professional qualifications. Any proposed changes in staff shall be reviewed and approved by DTSC.

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
		resumes, certificates and/or training to be provided for DTSC approval Documentation to be provided to DTSC as part of regular compliance reports		
Mitigation Measure CUL-2: Cultural Resources Management Plan. Prior to the start of cleanup activities, an SOI-qualified archaeologist shall be retained by each RP, and shall be subject to DTSC approval, to prepare a Cultural Resources Management Plan (CRMP) for their administrative area, which shall be submitted to DTSC for review and approval prior to the start of any ground-disturbing activities. Upon approval of DTSC, NASA may submit their ICR MP to satisfy the requirements of this measure, provided it meets the requirements of this mitigation measure. The purposes of the CRMPs are to document the actions and procedures to be followed to ensure avoidance or minimization of impacts to cultural resources consistent with CEQA Guidelines Section 15126.4(b), and to lay out a detailed program of mitigation for direct and indirect impacts on cultural resources during project implementation. The CRMPs shall cover all project activities across each RPs administrative area and for the life of the project. The CRMPs shall include, but are not limited to, the following elements and shall be consistent with all mitigation measures contained in this document: a. A description of the roles and responsibilities of cultural resources personnel, and the reporting relationships between project construction management and the mitigation and monitoring team, including lines of communication and notification procedures. b. Contact list for project personnel and provisions for regular contact list updates. c. Specific measures to be taken to avoid impacts to significant cultural resources, such as the designation of Environmentally Sensitive Areas, consistent with Mitigation Measure CUL-4 (Avoidance and Preservation in Place). d. An archaeological and Native American monitoring plan to be employed through the life of the project, including protocols to be followed during routine monitoring and during discovery situations; roles of archaeological and Native American monitors; agency communication requirements; and reporting requirements (consistent with Mitigation Measure CUL-5 [Archaeological and Native American Monitoring]). e. High-resolution maps for use by construction personnel to identify locations where archaeological monitoring is required, based on the Santa Susana Field Laboratory Geoarchaeological Assessment (Lockwood, 2016). f. Native American participation in all cultural-resources-related actions consistent with Mitigation Measures CUL-11 through CUL-13.	Prior to any ground-disturbing activities	Submittal of Cultural Resources Management Plans containing a detailed mitigation program and procedures by which subsequent requirements will be met as outlined in this measure for DTSC approval Language to be included in contractor scopes of work and agreements Written verification of consultant's professional qualifications Documentation to be provided to DTSC as part of regular compliance reports	DTSC	The Cultural Resources Management Plans shall be reviewed and approved by DTSC DTSC review of regular compliance reports demonstrating completion and approval of the Cultural Resources Management Plans and documenting consultant's professional qualifications. Any proposed changes in staff shall be reviewed and approved by DTSC.
	During remediation	Documentation of implementation of the approved Cultural Resources Management Plans as outlined in this measure to be provided to DTSC Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting approved Cultural Resources Management Plans as well as biennial review of effectiveness of the Plans Ongoing field verification by DTSC or its designated contractor of implementation of the Cultural Resources Management Plans

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
g. A Research Design to be used to guide the evaluation of cultural resources, including a regional cultural setting, appropriate regional research questions, (including questions that incorporate the role that mountain lions have in Native American lifeways and their interrelationship with other contributing elements of the SSFL TCP), and field methods for the testing and evaluation of cultural resources. h. Prescribed actions to be taken in the event that cultural resources are inadvertently discovered during remediation, or known resources are impacted in an unanticipated manner, consistent with Mitigation Measure CUL-6 (Inadvertent Discovery), including, but not limited to: • Establishment of an Environmentally Sensitive Area, marked with exclusion fencing, with a minimum of a 100-foot radius unless a smaller buffer is agreed to among the SOI-qualified archaeologist, Interested Tribes,[3] and relevant RP, and upon DTSC approval. Protective fencing shall not identify the protected area as a cultural resource area in order to discourage unauthorized disturbance or collection of artifacts. • Documentation of resource(s) on California Department of Parks and Recreation (DPR) 523 forms. • Inspection of the resource(s) by a qualified archaeologist. • Evaluation of the resource for listing in the California Register of Historical Resources (CRHR) (considering criteria 1 through 4) or as a unique archaeological resource, and as a contributor to the Simi Hills Archaeological District and/or the SSFL Traditional Cultural Property (TCP), following the research design established in the CRMP and consistent with the Simi Hills Archaeological District Study (Bray et al., 2017). i. Treatment protocols for significant cultural resources that cannot be avoided and analysis of data in a regional context, consistent with Mitigation Measures CUL-4 (Avoidance and Preservation in Place) and CUL-6 (Inadvertent Discovery), which shall include, but not be limited to: • A sufficient avoidance buffer, recommended by the S O I-qualified archaeologist, in coordination with the relevant RP, Interested Tribes, and with the approval of DTSC, to protect the resource until data recovery is completed; • Sample excavation. • Surface artifact collection. • Site documentation. • Special studies where sufficient data exists, as determined by the SOI-qualified archaeologist, including but not limited to radiocarbon dating, residue analysis, sourcing, and other materials analysis.				

[3] The term "Interested Tribes," as used in mitigation measures, is defined as those tribes or Native American individuals who are participating in DTSC's SSFL consultation process, including the Sacred Sites Council. DTSC recognizes the Tribes' involvement may change over time.

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
• Historical research, with the aim to target the recovery of important scientific data contained in the portion of the significant resource to be impacted by the project. • Documentation, photography, and collection of oral histories. Treatment for individual resources will be determined on a case-by-case basis by the SOI-qualified archaeologist, in coordination with the relevant RP, Interested Tribes (for prehistoric resources), and DTSC, and will depend on the nature of the resource and eligibility criteria. Treatment measures for affected resources shall be documented by the SOI-qualified archaeologist in a Work Plan for each site or group of sites. j. A report documenting the methods and results of the treatment of the resource shall be prepared by the SOI-qualified archaeologist, following Archaeological Resources Management Report (ARMR) guidelines, and shall be submitted to DTSC for review and approval within 90 days of the completion of treatment, and shall also be submitted to the South Central Coastal Information Center (SCCIC). k. Procedures for the appropriate treatment of human remains, consistent with Mitigation Measure CUL-18 (Human Remains). l. Procedures for Tribal access. m. Procedures for annual site condition verification, to document the condition of cultural resources throughout the life of the project and if impacts are observed, to provide additional protections, including but not limited to erosion controls and access barriers (consistent with Mitigation Measure CUL-8, Annual Site Condition Verification). n. Health and safety requirements for cultural resources personnel working onsite, including 40-hour Hazwoper training and copy of current certification for project records. o. Reporting procedures, including the requirement that reports resulting from documentation, evaluation, and treatment of cultural resources be filed with the SCCIC annually by April 1 of each year for work completed during the previous calendar year. p. Artifact collection, retention/disposal, and curation policies, including a statement that all cultural materials retained will be prepared in accordance with the requirements of an identified, qualified curatorial facility, per Mitigation Measure CUL-7 (Curation of Project Materials), and that the RPs shall be responsible for all expenses associated with the curation of the materials at the qualified curatorial facility. q. Preparation of an Annual Report that includes all cultural resources related activities that occurred for the previous calendar year. The annual report shall be submitted to DTSC for review and comment by April 1 of the year following the reporting year. The Annual Report shall include all documentation pertaining to Tribal communications required by Mitigation Measures CUL-11 through CUL-13, the Worker Cultural Resources Sensitivity Program required by Mitigation Measure CUL-3, the Annual Archaeological Monitoring Report with supporting documentation including daily logs required by Mitigation				

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Measure CUL-5, all documentation resulting from eligibility evaluations and data recovery or other treatment resulting from Mitigation Measures CUL-4, and CUL-6, and the research design produced as part of the CRMP, and documentation resulting from the annual site condition verification program required by Mitigation Measure CUL-8; and r. Biennial review of the effectiveness of the CRMP by DTSC, in coordination with the RPs, S O I-qualified archaeologist, and Interested Tribes, during the life of the project to determine the need for any revisions to the CRMP either based on new cultural resources discoveries or other new information for which the CRMP provides inadequate direction, or revisions necessary to address procedural inadequacies.				
Mitigation Measure CUL-3: Worker Cultural Resources Sensitivity Program. A worker cultural resources sensitivity program shall be implemented for the project. Prior to any ground-disturbing activity, an initial sensitivity training session shall be provided by the RPs to all project employees, contractors, subcontractors, and other professionals prior to their involvement in any ground-disturbing activities, with subsequent training sessions occurring for new personnel prior to start of work in the field. The RPs shall invite Interested Tribes to participate in and present Native American perspectives during the training sessions if they so choose. The sensitivity program shall address: the cultural (Native American, archaeological, and paleontological) sensitivity of the project site and a tutorial providing information on how to identify these types of resources; appropriate behavior; worker access routes and restrictions; work area cleanliness; specific procedures to be followed in the event of an inadvertent discovery per the CRMP; safety procedures when working with monitors; and consequences in the event of noncompliance. The training shall incorporate the significant role that plants and animals, such as mountain lions, have in traditional and contemporary Native American lifeways. The RPs shall notify DTSC and the Interested Tribes no less than 2 weeks prior to the training sessions. The program agenda and materials together with attendance rosters for the previous year shall be provided to DTSC as part of the Annual Report due April 1 of each year. In addition, refreshers shall occur during tailgate meetings prior to work in areas with known cultural resources or on a quarterly basis. In addition, refreshers shall occur during tailgate meetings prior to work in areas with known cultural resources or on a quarterly basis.	Submittal of Program training materials for approval by DTSC prior to ground disturbance Sensitivity training shall be conducted prior to project employees' involvement in any ground-disturbing activities Subsequent sensitivity training sessions shall occur for new personnel and refreshers during tailgate meetings prior to work in areas with known cultural resources or on a quarterly basis The RPs shall notify DTSC and the Interested Tribes no less than 2 weeks prior to the training sessions. The program agenda and materials together with attendance rosters for the previous year shall be provided to DTSC as part of the Annual Report due April 1 of each year.	RPs shall conduct an initial sensitivity training for all project employees, contractors, subcontractors, and other professionals and shall be repeated for new personnel The RPs shall document all notices, program agenda and materials, and attendance rosters to be submitted to DTSC Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting cultural resources sensitivity training including program agenda, training materials, and attendance rosters, as well as tailgate refreshers

Mitigation Measure	Implementation		Enforcement	
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Mitigation Measure CUL-4: Avoidance and Preservation in Place. The RPs shall carry out, under the direction of DTSC, and require all subcontractors to carry out, all project activities in ways that minimize significant impacts to cultural resources. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to historical and tribal cultural resources, taking into consideration the project objectives, in order to maintain the important relationship between artifacts and their archaeological context and to preserve each resource's scientific value, as well as to preserve the cultural values ascribed to resources by the Interested Tribes. Where DTSC has determined that avoidance will be implemented, the remediation zone shall be narrowed or otherwise altered to avoid cultural resources. In coordination with the SOI-qualified archaeologist, avoidance of cultural resources shall be ensured by the delineation of Environmentally Sensitive Areas, including an area within 100 feet of the known or previously mapped boundaries of the resources, and the resources shall be marked with exclusion markers as "Environmentally Sensitive Areas." Protective fencing shall not identify the protected area as a cultural resource area in order to discourage unauthorized disturbance or collection of artifacts. The fence installation shall be monitored by a qualified archaeological monitor (see Mitigation Measure CUL-5) to ensure there are no impacts to any cultural resources. Consistent with Mitigation Measure CUL-5 (Archaeological and Native American Monitoring) Interested Tribes shall be invited to observe any ground disturbance, including fence installation. Archaeological monitors shall periodically inspect protective fencing to ensure that it remains in place while work occurs immediately next to the fenced areas. Consistent with Mitigation Measure CUL-5 (Archaeological and Native American Monitoring), a qualified archaeological monitor shall monitor all project-related ground disturbing activities within 100 feet of the Environmentally Sensitive Areas, in order to ensure avoidance. If due to cleanup requirements a cultural resource cannot be avoided, then the resource shall be evaluated for its individual eligibility for listing in the CRHR or as a unique archaeological resource, and for each resource's eligibility as a contributor to the Simi Hills Archaeological District and or the SSFL TCP, following the evaluation procedures detailed in the CRMP and consistent with the Simi Hills Archaeological District Study (Bray et al., 2017). If the resource is determined to be significant (i.e., eligible for individual listing in the CRHR or as a unique archaeological resource, and/or as a contributor to the Simi Hills Archaeological District and/or the SSFL TCP), DTSC, in coordination with Interested Tribes, would have the option to exercise the AOC exception for "Native American artifacts that are formally recognized as Cultural Resources." For the Boeing areas of responsibility, the 2022 Settlement Agreement (Exhibit 12) outlines the process for application of cultural resource exceptions. If DTSC elects not to exercise an exception, or if avoidance of the significant cultural resource is determined by DTSC to be infeasible through project redesign, then the	Prior to remediation	Written documentation compiled by RPs in coordination between the RPs, DTSC, and Interested Tribes to determine where avoidance of cultural resources will be implemented. Written documentation of notifications to Tribes inviting them to participate in monitoring, including copies of Native American noticing, scheduling, and communication to be provided to DTSC Documentation by a qualified archaeological monitor demonstrating onsite monitoring of fence installation around Environmentally Sensitive Areas through daily logs and photographs For cultural resources that DTSC determines cannot be avoided, written documentation demonstrating completed eligibility evaluations shall be provided to DTSC by the RPs consistent with the procedures outlined in the CRMPs per CUL-2 for review and approval as well as for DTSC coordination with Interested Tribes Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting coordination between the RPs, DTSC, and Interested Tribes, and monitoring logs Ongoing field verification by DTSC or its designated contractor to document that protections for avoided cultural resources are implemented DTSC review and approval of cultural resource eligibility evaluations prior to commencing work in areas where cultural resources cannot be avoided
	During remediation	Documentation by a qualified archaeological monitor demonstrating onsite monitoring of all ground disturbance within 100 feet of Environmentally Sensitive Areas through daily logs and photographs Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting archeological monitoring Ongoing field verification by DTSC or its designated contractor to document compliance with avoidance and monitoring requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
resource would be subject to appropriate data recovery or treatment, following the treatment and reporting procedures detailed in the CRMP, that addresses the resource's relevant eligibility criteria and its eligibility as an individual resource, and/or a contributor to the District and/or TCP, as determined by DTSC and the SOI-qualified archaeologist, and in coordination with Interested Tribes.				
Mitigation Measure CUL-5: Archaeological and Native American Monitoring. Archaeological monitoring shall be conducted during project-related ground-disturbing activities for the purpose of identifying and avoiding impacts to archaeological resources, consistent with the monitoring plan detailed in the CRMP. Ground-disturbing activities include, but are not limited to, brush clearance, grubbing, excavation, trenching, grading, and drilling. Full-time archaeological monitoring shall occur during the following three activities: a. All initial brush clearance and vegetation removal. b. All ground-disturbing activities within 100 feet of an Environmentally Sensitive Area. c. All ground-disturbing activities within areas identified as having a high potential for buried archaeological resources as identified in Figure 7 of the *Santa Susana Field Laboratory Project: Geoarchaeological Assessment* (Lockwood, 2016). The Qualified Archaeologist shall have the authority to modify monitoring locations and frequencies based on soil observations and/or discoveries.	Prior to ground disturbing activities	Written documentation of notifications to Tribes inviting them to participate in monitoring, including copies of Native American noticing, scheduling, and communication to be provided to DTSC Written verification of archeological monitors' professional qualifications, such as copies of degrees, certificates and/or training including 40-hour HAZWOPER training to be kept on file by the RPs and made available to DTSC or its designated consultant upon request; Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports Cultural Resources-specific Annual Reports (as required by CUL-2) documenting Tribe coordination and noticing and monitoring implementation
Archaeological monitors shall have a B.S. or B.A. degree in anthropology, archaeology, or a related field, and at least one year's experience monitoring in California and shall be 40-hour HAZWOPER trained and currently certified. Archaeological monitors shall work under the direct supervision of an archaeologist meeting the minimum professional qualifications standards (PQS) set forth by the Secretary of the Interior (codified in 36 CFR Part 61; 48 FR 44739) consistent with Mitigation Measure CUL-1 (Cultural Resources Personnel Professional Qualifications Standards). The number of archaeological monitors onsite at any given time during the three categories of ground disturbing activities described above shall be dependent on the size and geographic configuration of areas in which work is occurring. Archaeological monitors shall be positioned in proximity to the work sufficient for adequate visibility of surface and subsurface conditions. Typically, if two work areas are positioned more than 500 feet apart, a second monitor would be necessary to provide adequate monitoring of the activities. The number of archaeological monitors required for any given activity shall be determined by the SOI qualified archaeologist and with the approval of DTSC. Interested Tribes shall be invited to conduct Native American monitoring during all ground-disturbing activities associated with the project. A Native American monitor shall be invited to be onsite daily to coordinate with the archaeological monitors and to provide tribal perspectives in the	During remediation The Annual Report shall be submitted to DTSC by April 1 for the previous calendar year Copies of Annual Reports and DPR 523 forms for the preceding year shall be provided to the SCCIC by April 1	Written documentation of notifications to Tribes inviting them to participate in monitoring, including copies of Native American noticing, scheduling, and communication, to be provided to DTSC Written documentation demonstrating archaeological monitoring as outlined in CUL-5 including daily monitoring logs and photographs, and other cultural resources documentation generated as a result of the monitoring to be submitted to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting noticing and archeological and Native American monitoring Ongoing field verification by DTSC or its designated contractor to document compliance with monitoring requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
event a discovery occurs. The Native American monitor shall be free to visit different activity areas throughout the course of a given day, notwithstanding any limitations based on safety concerns the RPs may identify in coordination with DTSC. Native American monitors shall be afforded a minimum of 1 weeks' notice prior to the commencement of project-related ground-disturbing activities. During project activities, Native American monitors shall be provided with weekly work forecasts to facilitate scheduling of monitors. Because project implementation activities are often unpredictable, there may be changes in work activities. Native American monitors shall be notified by the RPs of any scheduling changes as soon as possible. The RPs will use daily field meetings, telephone, and email as methods of communicating work schedules. Native American monitors shall be alerted at the end of each workday whether work activities will be taking place the following day. Archaeological monitors shall complete daily monitoring logs. Monitoring activities shall be summarized in the Annual Report required by Mitigation Measure CUL-2 to be submitted to DTSC annually on April 1 for the previous calendar year. The monitoring summaries shall document dates of monitoring and monitoring participants, activities observed, soil types observed, and any archaeological resources encountered. The RPs shall provide Interested Tribes an opportunity to contribute their monitoring observations to the Annual Reports consistent with Mitigation Measure CUL-11 (Native American Document Review and Comment). DPR 523 forms, following the OHP's *Instructions for Recording Historical Resources*, shall be prepared and filed with the SCCIC for all newly identified or updated resources and shall be appended to the Annual Reports.				
Mitigation Measure CUL-6: Inadvertent Discovery of Potential Historical Resources and Unique Archaeological Resources. In the event that cultural resources are inadvertently discovered during ground-disturbing activities, work in the vicinity of the discovery shall immediately cease within a 100-foot radius and temporary protective measures shall be implemented pursuant to provisions of the CRMP. If an archaeological monitor is present onsite, he or she shall be summoned to assess the significance of the find in coordination with the SOI-qualified archaeologist. If a monitor is not present onsite, no work within 100 feet of the find shall occur until an archaeological monitor or the SOI-qualified archaeologist can report to the site to assess the significance of the find. The RPs shall notify DTSC within 24 hours of the discovery of any potential historical, unique archaeological, or tribal cultural resources. Avoidance and preservation in place shall be the preferred manner of mitigating impacts to such resources, taking into consideration the project objectives of soil remediation, in order to maintain the important relationship between artifacts and their archaeological context and to preserve each resource's scientific value, as well as to preserve the cultural values ascribed to resources by the Interested Tribes. The feasibility of avoidance, as it relates to the project objectives of soil	During ground-disturbing activities Work within 100 feet of a discovery should immediately cease and temporary protective measures implemented RPs shall notify DTSC within 24 hours of a discovery	Written documentation in the form of daily monitoring logs and other communications demonstrating work stoppages occurring in the event of discovery to be provided to DTSC as part of the regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) and at any time at DTSC's request Documentation demonstrating notification to DTSC within 24 hours of discovery Written documentation compiled by DTSC of coordination between the RPs, DTSC, and Interested Tribes to determine whether avoidance of the discovery is feasible If avoidance is determined feasible by DTSC, written documentation shall be provided demonstrating avoidance	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting proper noticing, coordination conducted for treatment of each discovery, and monitoring as required DTSC review and approval of cultural resource eligibility evaluations prior to commencing work in areas where cultural resources cannot be avoided Ongoing field verification by DTSC or its designated contractor of implementation of inadvertent discovery requirements

Mitigation Measure	Implementation		Enforcement	
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remediation, shall be determined by DTSC based on factors including soil contamination levels in coordination with Interested Tribes and the relevant RP. Avoidance shall be ensured by the delineation of Environmentally Sensitive Areas, including an area within 100 feet of the resource (unless a smaller buffer is agreed to between the SOI-qualified archaeologist, Native American monitor, RP, and upon DTSC approval), which shall be marked with exclusion markers. Protective fencing shall not identify the protected area as a cultural resource area in order to discourage unauthorized disturbance or collection of artifacts. If due to project design changes or cleanup requirements a cultural resource cannot be feasibly avoided, then the resource shall be evaluated for individual eligibility for listing in the CRHR or as a unique archaeological resource, and for its eligibility as a contributor to the Simi Hills Archaeological District and/or the SSFL TCP, following the evaluation procedures detailed in the CRMP and consistent with the Simi Hills Archaeological District Study (Bray et al. 2017). If the resource is determined to be significant (i.e., eligible for listing in the CRHR or as a unique archaeological resource, or as a contributor to the Simi Hills Archaeological District and/or the SSFL TCP), DTSC, in coordination with Interested Tribes, would have the option to exercise the AOC exception for "Native American artifacts that are formally recognized as Cultural Resources" (AOC exception). For the Boeing areas of responsibility, the 2022 Settlement Agreement (Exhibit 12) outlines the process for application of cultural resource exceptions. If DTSC elects not to exercise an exception, or if avoidance of the significant cultural resource is determined to be infeasible through project redesign by DTSC, then the resource would be subject to appropriate data recovery or treatment, following the treatment and reporting procedures detailed in the CRMP, that addresses the resource's relevant eligibility criteria and its eligibility as an individual resource, and/or a contributor to the District or SSFL TCP, as determined by DTSC and the SOI-qualified archaeologist, and in coordination with Interested Tribes. Documentation resulting from eligibility evaluations and data recovery or other treatment occurring during the previous calendar year shall be made part of the Annual Report due to DTSC by April 1 of the following calendar year as prescribed in Mitigation Measure CUL-2 (Preparation of a Cultural Resources Management Plan).		and monitoring procedures have been implemented For discoveries that DTSC determines cannot be avoided, written documentation demonstrating completed eligibility evaluations shall be provided to DTSC by the RPs consistent with the procedures outlined in the CRMPs per CUL-2 for review and approval as well as for DTSC coordination with Interested Tribes Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)		
Mitigation Measure CUL-7: Curation of Project Materials. Prior to the start of initial activities or overall site cleanup, the RPs shall obtain a written curation agreement with the Autry Museum's Southwest Museum of the American Indians, where previous collections from SSLF are housed, to curate all prehistoric archaeological materials recovered from SSFL (except those determined to be grave goods or associated with human remains, which will be treated in accordance with CUL-18: Inadvertent Discovery of Human Remains and all applicable state and federal laws). In the event that the museum in unable to accept additional collections, the RPs shall agree upon, and upon discretionary approval by	Prior to remediation	Fully executed curation agreement either with the Autry Museum's Southwest Museum or with an alternate repository as approved by DTSC In the event an alternate facility is needed, written documentation compiled by the RPs demonstrating coordination with Interested Tribes on the selection of an alternate repository	DTSC	DTSC review of regular compliance reports documenting coordination between the RPs and Interested Tribes, curation agreements, and any additional material necessary to verify implementation of curation requirements

Mitigation Measure	Implementation		Enforcement	
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DTSC, an alternate single accredited repository at which to curate the collections. If selection of an alternate repository is necessary, the following stipulations shall apply: (1) the RPs shall consult with and consider the recommendations of Interested Tribes during the selection process; (2) the alternate repository shall be located in southern California so that the materials are available locally to Tribal members and researchers; and (3) the facility shall meet the standards provided in the California State Historical Resources Commission's Guidelines for the Curation of Archaeological Collections and those set forth in 36 CFR 79. If no local Southern California facility meets these requirements or is able to accept the collections, other accredited facilities in the State of California may be considered. The RPs shall transfer curation of materials currently in the RPs' possession or currently housed at non-local facilities to the Autry Museum's Southwest Museum of the American Indians such that the materials can be accessioned as a unified collection. If selection of an alternate repository is necessary, those materials would be transferred to the alternate facility instead. Transfer of materials shall be completed within 1 year of obtaining a written curation agreement with the Autry Museum's Southwest Museum of the American Indians or execution of a curation agreement with the alternate facility. All prehistoric archaeological materials recovered from SSFL as a result of project activities shall be curated at the agreed-upon accredited repository within 60 days of DTSC approval of final reporting (i.e., documentation resulting from eligibility evaluations and data recovery or other treatment, and annual monitoring reports). Historic-period archaeological materials from eligible sites shall also be curated in accordance with the provisions of this measure; historic-period archaeological materials from non-eligible sites may be discarded.		Within 1 year of execution of the curation agreement, written documentation prepared by the RPs and the repository demonstrating the transfer of materials, not already housed at the Autry or alternate repository		
	During and following remediation	Materials recovered during project activities shall be curated at the repository within 60 days of DTSC approving the final report/s associated with the collected materials Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting curation within the required timeframe
Mitigation Measure CUL-8: Annual Site Condition Verification. As part of the CRMP required by Mitigation Measure CUL-2, the RPs shall establish an annual site condition verification program to document the condition of all identified cultural resources in the project site including evaluated and unevaluated resources. The site verification program shall be implemented by an SOI-qualified archaeologist on an annual basis for the duration of the project. The RPs shall afford Interested Tribes the opportunity to participate in Native American monitoring during the annual site condition verification program and provide, at a minimum, 2 weeks' written notice to Interested Tribes prior to the commencement of the program each year. The goal of the annual site condition verification program is to monitor on an annual basis whether project-related activities are indirectly impacting known cultural resources as a result of an increase in personnel and human activity onsite, changes in erosional patterns due to the movement of soils onsite, and other disturbances to resources that could be an inadvertent result of project activity. The annual site condition verification program shall include: development of Site Condition Assessment Forms and database; confirmation of resource boundaries with submeter GPS; relocation of previously identified features; confirmation of locations, quantities, and types of artifacts present; examination of the condition of	On an annual basis for the duration of the project The Cultural Resources-specific Annual Reports (as required by CUL-2) shall be submitted to DTSC by April 1 for the previous calendar year If the annual site condition verification program identifies impacts to cultural resources, the appropriate RP shall notify DTSC immediately	Written documentation prepared by the RPs of implementation of annual site verification program by an S O I-qualified archaeologist, including Site Condition Assessment Forms, database spreadsheet, DPR 523 form updates, photographs, documentation of protective measures implemented, and documentation of notices and communications with Interested Tribes shall be provided to DTSC. Notifications to be sent to DTSC upon scheduling and completion of the program each year Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting annual site verification program, notices, and any forms and photographs, documentation of protective measures implemented Field verification by DTSC or its designated contractor of implementation of site condition assessment and protective measures as needed

Mitigation Measure	Implementation		Enforcement	
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rock art; general condition and disturbances observed; and photography to document whether any change in resource condition has occurred. DPR 523 form updates, following OHP *Instructions for Recording Historical Resources*, shall be prepared and filed with the SCCIC for all resources where changes in setting or condition are observed. The Site Condition Assessment Forms, database spreadsheet, DPR 523 form updates, and documentation of the implementation of additional protective measures for resources where impacts are observed, shall be provided to DTSC annually by April 1 for the previous calendar year as part of the Annual Report required by Mitigation Measure CUL-2 (Preparation of a Cultural Resources Management Plan). The RPs shall notify DTSC upon scheduling and completion of the program each year. Mitigation Measure CUL-11 (Native American Document Review and Comment) shall govern review and comment of the report by Interested Tribes. If the annual site condition verification program identifies impacts to cultural resources resulting from implementation of the project, or if, at any time, the RPs or DTSC become aware of such impacts, the appropriate RP shall notify DTSC immediately and implement additional protective measures including but not limited to erosion controls and access barriers or other measures as necessary to protect cultural resources from project impacts, as recommended by the SOI-qualified archaeologist in coordination with Interested Tribes.		If the annual site condition verification program identifies impacts to cultural resources, the appropriate RP shall notify DTSC immediately and implement additional protective measures		
Mitigation Measure CUL-9: Comprehensive District Study and National Register Nomination. Prior to project implementation, the RPs shall retain, and DTSC shall have discretionary approval of, an SOI-qualified archaeologist who shall prepare a National Register Nomination form for the Simi Hills Archaeological District. The Nomination shall be submitted to DTSC for review and comment and shall be filed with the National Park Service within 1 year of retention of the SOI-qualified archaeologist. The nomination drafted by the Santa Ynez Band of Chumash Indians in July 2018 may be utilized in meeting this requirement to the extent the RPs and Tribe agree, and with approval of DTSC. Following the completion of all archaeological studies related to project implementation (i.e., all archaeological studies related to testing, data recovery, and treatment of affected resources that are conducted as part of compliance with Mitigation Measures CUL-2: Cultural Resources Management Plan and CUL-6: Inadvertent Discovery of Potential Historical Resources and Unique Archaeological Resources), the RPs shall retain, and DTSC shall have discretionary approval of, an SOI-qualified archaeologist who will prepare a Comprehensive Simi Hills Archaeological District Study. The Study shall build on the previously prepared Simi Hills Archaeological District Study (Bray et al., 2017), and shall document and analyze all additional archaeological resources data generated as a result of the project, including data collected through testing, data recovery, and treatment. The Study shall consider similar research questions shall re-evaluate the boundaries of and contributors to the District in light of the additional data and project impacts. If the Study finds that the District continues to retain sufficient integrity for listing, the National Register Nomination for	Prior to remediation the National Register Nomination form shall be filed with the National Park Service within 1 year of retention of the S O I-qualified archaeologist	Review and approval of the qualifications for an S O I-qualified archaeologist to prepare National Register Nomination form for the Simi Hills Archaeological District The National Register Nomination form to be submitted to DTSC for review and comment and then be filed with the National Park Service within 1 year of retention of the SOI-qualified archaeologist Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of the qualifications and approval of the SOI-qualified archaeologist DTSC review and comment on the National Register Nomination form prior to submittal to the National Park Service. Documentation of submission to the National Park Service to be forwarded to DTSC to verify compliance with this requirement.
	Following completion of all archaeological studies related to project implementation The Simi Hills Archaeological District Study and National Register Nomination form update shall be completed within 1 year of completion of project activities	Written qualifications for DTSC for approval of an SOI-qualified archaeologist to prepare the Comprehensive Study and Nomination update A Comprehensive Simi Hills Archaeological District Study and National Register Nomination form update, if required, shall be submitted	DTSC	DTSC review and approval of the qualifications for the SOI-qualified archaeologist Review and approval of the Comprehensive Simi Hills Archaeological District Study, and National Register Nomination form update as well as review of documentation of coordination with

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
the District will be updated. The Study and updated Nomination shall be submitted to DTSC for review and comment within 1 year of the completion of project activities. The Study shall be submitted to the SCCIC once approved and finalized and the Nomination update shall be coordinated by the SOI-qualified archaeologist with SHPO and National Park Service.		to DTSC for review and comment within 1 year of completion of project activities Documentation of the study's submission to the SCCIC and consultation of the SOI-qualified archaeologist with SHPO and National Park Service for the Nomination update Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)		NPS and SHPO and submission to the SCCIC
Mitigation Measure CUL-10: Burro Flats Site Complex Documentation and National Register Nomination. Prior to project implementation, NASA and Boeing shall retain, and DTSC shall have discretionary approval of, an SOI-qualified archaeologist to confirm the boundary of the Burro Flats Site Complex on both NASA and Boeing land. Based on this boundary confirmation, the SOI-qualified archaeologist shall prepare an updated DPR 523 form and National Register Nomination form for the Burro Flats Site Complex. The Nomination shall be prepared within one year of the boundary confirmation. The updated Nomination shall utilize and synthesize all available existing information on the Burro Flats Site Complex and shall be coordinated by the SOI-qualified archaeologist with SHPO and National Park Service. This effort may be coordinated with efforts that are being carried out in response to NASA's FEIS Cultural Mitigation Measure-4: Treatment of Burro Flats Site. Upon approval of DTSC, the updated National Register Nomination form completed in response to NASA's FEIS Cultural Mitigation Measure-4: Treatment of Burro Flats Site may be used to satisfy the National Register Nomination form update required by this measure, provided the updated boundary and description include the portion of the Burro Flats Site Complex on Boeing land. Upon project completion, the boundary shall be re-confirmed to take into account any new discoveries, and if necessary, the National Register Nomination form shall be updated to reflect any changes to the boundary.	Prior to remediation The DPR 523 form and updated National Register Nomination form shall be filed with the NPS within 1 year of the boundary confirmation	Written qualifications for DTSC review and approval of an SOI-qualified archaeologist to confirm boundary of Burro Flats Site Complex, prepare DPR form, and updated Nomination Updated DPR 523 form and National Register Nomination form for the Burro Flats Site Complex to DTSC for review and approval Documentation of consultation with the SHPO and NPS Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review and approval of the qualifications for the SOI-qualified archaeologist Review and approval of updated DPR 523 form and National Register Nomination form DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) demonstrating coordination with the SHPO and NPS
Mitigation Measure CUL-11: Native American Document Review and Comment. Interested Tribes shall be afforded the opportunity to review and comment on all draft cultural-resources-related documentation prepared as a result of the project. Upon review by Interested Tribes, Native American comments will be provided in writing for consideration by DTSC, in coordination with the RPs prior to a document being finalized. Draft cultural resources documents to be made available for Interested Tribes' comment shall include, but not be limited to the CRMP; cultural-resources-related technical reports; site condition verification documentation; and annual reports. Interested	Prior to finalization of cultural resources documents Interested Tribes shall be afforded 30 days to review and comment on cultural resources-related documents.	Documentation of coordination of cultural resources-related documents with Interested Tribes to be retained by the RPs and provided to DTSC upon request Prior to being finalized, cultural resources-related documents shall be provided to DTSC for review and approval and shall include comments	DTSC	DTSC review of cultural resources-related documents, regular compliance reports, and Cultural Resources-specific Annual Reports (as required by CUL-2) demonstrating coordination with Interested Tribes and draft cultural resources documents

Mitigation Measure	Implementation		Enforcement	
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Tribes shall have 30 days from receipt of a document to provide written comments.		from Interested Tribes (provided the Tribes approve of sharing comments with DTSC) Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)		
Mitigation Measure CUL-12: Native American Access. Interested Tribes shall be provided reasonable access to the project site for traditional, ceremonial, and religious uses upon written request to the RPs, to the extent that the landowners and land managers have the authority to facilitate such access and be consistent with existing laws, regulations, and agreements as they pertain to property within the project site. There may be access restrictions into certain areas, subject to DTSC review, with regard to health and safety concerns and to ensure noninterference with approved remediation activities. The RPs shall retain copies of all access-related communications to be provided to DTSC on an annual basis, as required by Mitigation Measure CUL-13 (Native American Communication).	During remediation The annual report including all access-related communications is due to DTSC April 1 for the previous calendar year In instances where Interested Tribes' access is restricted and cannot be granted, the RPs shall contact DTSC immediately for review	Record of coordination between RPs and Interested Tribes regarding access including written access requests and responses to be provided to DTSC as part of Cultural Resources-specific Annual Reports (as required by CUL-2) In instances where Interested Tribes' access is restricted and cannot be granted, the RPs shall contact DTSC immediately to review the request	DTSC	DTSC review of Cultural Resources-specific Annual Reports (as required by CUL-2) demonstrating coordination between RPs and Interested Tribes including all access-related communications In instances where Interested Tribes' access is restricted or denied, DTSC shall review and coordinate with the RPs and Tribes
Mitigation Measure CUL-13: Native American Communication. The RPs shall communicate with Interested Tribes prior to the start of and during remediation activities for the project, regarding project progress, upcoming site remediation activities, and other topics of interest to Interested Tribes. The RPs shall document, and accommodate the Tribes' preferences for method and timing of communication and for transmitting large documents. Outreach efforts between the Interested Tribes and the RPs shall be communicated by the RPs to DTSC on an annual basis during project activities for review and input, as part of the annual report due to DTSC on April 1 of each year, as required by Mitigation Measure CUL-2 (Preparation of a Cultural Resources Management Plan).	During remediation The Annual Report shall be submitted to DTSC by April 1 for the previous calendar year.	Written verification, including a memorandum prepared by the RPs that captures preferred methods and timing of communications with Interested Tribes Documentation demonstrating coordination efforts between the Interested Tribes and the RPs shall be compiled by the RPs to DTSC on an annual basis during project activities as part of the Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of Cultural Resources-specific Annual Reports (as required by CUL-2) documenting coordination efforts between the Interested Tribes and the RPs
Mitigation Measure CUL-14: Comprehensive Ethnographic Study. Within 6 months of project approval, the RPs shall retain, and DTSC shall have discretionary approval of, a qualified ethnographer with demonstrated expertise in the field of ethnography and cultural anthropology, to prepare a Comprehensive Ethnographic Study that documents the ethnographic context in which the SSFL TCP and contributing archaeological resources exist, focusing on the SSFL and surrounding Simi Hills. The qualified ethnographer shall be selected in coordination with Interested Tribes, to the extent that Interested Tribes elect to participate. The purpose of the Study will be to provide an ethnographic context for the SSFL TCP, to attempt to capture the significance and traditional cultural value ascribed to the SSFL TCP, and	Within 6 months of project approval the RPs shall retain a qualified ethnographer to be approved by DTSC	Written qualifications for DTSC for approval of a qualified ethnographer to prepare a Comprehensive Ethnographic Study Written documentation of coordination on the selection of the ethnographer with DTSC and Interested Tribes Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review and approval of qualifications for the qualified ethnographer DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) demonstrating coordination on the selection of the ethnographer with DTSC and Interested Tribes

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
to provide a form of preservation and dissemination of Native American perspectives of the landscape (including plants and animals) and the places and material remains within it. The Study shall be prepared in coordination and collaboration with Interested Tribes, to the extent that Tribes choose to participate, and shall include interviews with representatives of Interested Tribes who express interest in participating. The draft Study shall be submitted to DTSC and Tribal governments for review and comment within 2 years of the start of project activities. This effort may be coordinated with efforts that are being carried out in response to NASA's FEIS Cultural Mitigation Measure-3, Treatment of Traditional Cultural Property. Upon approval of DTSC, the ethnographic study completed in response to NASA's FEIS Cultural Mitigation Measure-3, Treatment of Traditional Cultural Property, may be used to satisfy the ethnographic study required by this measure.	The draft Comprehensive Ethnographic Study shall be submitted to DTSC and Tribal governments for review and comment within 2 years of the start of project activities.	Submittal of Comprehensive Ethnographic Study for DTSC review and approval in consultation with Tribal governments	DTSC	The Comprehensive Ethnographic Study shall be reviewed and approved by DTSC in consultation with Tribal governments
Mitigation Measure CUL-15: Rock Art Site Recordation and Interpretation. The RPs shall retain, and DTSC shall approve, an SOI-qualified archaeologist with demonstrated expertise in the field of rock art studies to coordinate the comprehensive recordation and interpretation of all archaeological sites within the project site that contain rock art. The methods of recordation and the interpretations developed shall be coordinated and collaborated with Interested Tribes. The rock art site recordation component shall involve thorough documentation of archaeological sites containing rock art, their immediate setting within the SSFL and Simi Hills, and the rock art itself, with the goal of documenting their condition prior to project implementation, and preparing an interpretive report focused on the results of the documentation, and interpretation of the age, content, and artistic style of the rock art. The documentation shall be accomplished through the use of accepted methodologies and current state-of-the-art technologies, which may include (but are not limited to) mapping, digital photography, stereo spherical gigapixel photography, drawing, photogrammetry, laser scanning, digital image processing techniques (including D-Stretch), Reflectance Transformation Imaging, residue analysis, and archaeological dating and/or other rock art documentation techniques provided by the Center of Interdisciplinary Science for Art, Architecture, and Archaeology at University of California, San Diego, or other service provider who conducts similar documentation techniques. The appropriate methods and techniques shall be determined by the SOI-qualified archaeologist and service provider, in consultation with Interested Tribes, the relevant RP, and on federally owned land, the SHPO. The rock art site documentation shall be completed prior to the start of project activities in order to capture the pre-project condition of the rock art sites and to ensure that the pre-project condition and setting and feeling of the rock art sites is captured prior to disturbances. The rock art interpretation component (an interpretive report) shall include a description of the regional context for the rock art; a review of regional and local rock art types, techniques, pigments, and chronologies; and interpretation of symbolism. The RPs shall collaborate with the SOI-	Prior to remediation The rock art documentation and report shall be submitted to DTSC within 1 year of the completion of the documentation	Written qualifications for DTSC review and approval of an SOI-qualified archaeologist with demonstrated experience in the field of rock art to coordinate rock art site recordation and interpretation Written documentation of SOI-qualified archaeologist's coordination with Interested Tribes, relevant RP, and SHPO on methods of the study to be appended to the completed study Conduct rock art site documentation utilizing accepted methods as outlined in this measure Documentation to be provided to DTSC as part of regular compliance reports Submittal of completed Rock Art documentation and report to DTSC for review and approval within 1 year of the completion of the documentation and submitted to the SCCIC and copies to Interested Tribes upon request to the RPs	DTSC	DTSC review and approval of the qualifications for an SOI-qualified archaeologist DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) to ensure that the pre-project condition and setting and feeling of the rock art sites is captured prior to disturbances The Comprehensive Ethnographic Study shall be reviewed and approved by DTSC

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
qualified archaeologist, Interested Tribes (to the extent Tribes chose to participate), and DTSC on the content and interpretations to be studied and presented in the report. The rock art documentation and report shall be submitted to DTSC within 1 year of the completion of recordation and shall be submitted to the SCCIC and copies to Interested Tribes upon request to the RPs. This effort may be coordinated with efforts that are being carried out in response to NASA's FEIS Cultural Mitigation Measure-3, Treatment of Traditional Cultural Property. Upon approval of DTSC, the ethnographic study completed in response to NASA's FEIS Cultural Mitigation Measure-3, Treatment of Traditional Cultural Property, may be used to satisfy the ethnographic study required by this measure.				
Mitigation Measure CUL-16: Research Grant for Future Cultural Resources Studies. Within 6 months of project approval, each RP shall make a 1-year grant contribution to the National Science Foundation (NSF) for studies on topics of tribal interest related to the cultural resources of the SSFL such that members of the Tribal community may identify aspects of the SSFL TCP and related archaeological resources impacted by the project that may warrant further preservation through study. Formal documentation that the grant contribution has been made to the NSF shall be provided to DTSC within 7 months of project approval. Each of the three grants would enable an undergraduate or graduate student to use the cultural resources data obtained through the implementation of project-related archaeological, ethnographic, and rock art mitigation, or to study collections and materials previously recovered from SSFL, such as those curated at the Autry Museum of the American West or other museums and curatorial facilities, in the preparation of a research project, such as a thesis, dissertation, or published paper. Each student would enter into an agreement that sensitive archaeological site and tribal information is kept confidential. If the NSF is unable to find students interested in using the grant for studies of the cultural resources of the SSFL within 10 years of the funding of the grant, then the grant funds will be returned to the RPs or their designees, who may, at their discretion, elect to contribute the funding to another, similar topic of study in the larger Santa Monica Mountains Region and adjacent coast.	Within 6 months of project approval, each RP shall arrange a 1-year grant contribution to the NSF with documentation to DTSC within 7 months of project approval	Each RP shall arrange a 1-year grant contribution to the NSF with documentation to DTSC within 7 months of project approval Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting the RPs 1-year grant contribution was made to the NSF within the required timeframe
Mitigation Measure CUL-17: Paleontological Resources Monitoring and Mitigation Plan. Prior to the start of initial project or program level activities, the RPs shall retain a qualified principal paleontologist (investigator) meeting the SVP (2010) standards to prepare a Paleontological Resources Monitoring and Mitigation Plan (PRMMP). The PRMPP shall be approved by DTSC before work (including, but not limited to, ground-disturbing activities) may be initiated on the site. The PRMPP shall include: • Retention of Qualified Staff: The PRMMP shall stipulate that qualified professionals meeting the SVP (2010) standards shall conduct paleontological work.	Prior to remediation	RPs to provide written qualifications for DTSC review and approval of a qualified principal paleontologist Submittal of a Paleontological Resources Monitoring and Mitigation Plan for DTSC approval Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review and approval of the qualifications for a principal paleontologist Review and approval of the Paleontological Resources Monitoring and Mitigation Plan

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
• Construction Worker Sensitivity Training: The PRMMP shall state that construction personnel shall be trained to understand what paleontological resources are, which types of fossils may be encountered during ground disturbance, and measures used to protect paleontological resources in compliance with CEQA and other relevant legislation. Construction personnel shall also be trained on the procedures to be followed upon the discovery of paleontological materials with and without a paleontological monitor onsite. Personnel shall be instructed that unauthorized collection or disturbance of fossils is unlawful and can result in criminal penalties. • Monitoring Requirements: The PRMMP shall require full-time monitoring of ground disturbing activities in the high sensitivity Santa Susanna Formation (Tsu, Tsuv, and Tsi), the moderate to high lower Chatsworth Formation (Kcsh), and the moderate sensitivity detrital sediments of Lindero Canyon geological unit (Tls and Tlsc). The PRMMP shall also require part-time monitoring below a depth of 3 feet in the low to moderate sensitivity upper Chatsworth Formation (Kcs) and low sensitivity Quaternary alluvium (Qa) to ensure no significant paleontological resources are being impacted. The PRMMP shall develop a coordination strategy to ensure adequate monitoring of construction disturbances, and procedures to reduce, or discontinue monitoring in nonproductive geological lenses per the SVP (2010) guidelines. The PRMMP shall also detail the daily and weekly reporting requirements of the paleontological monitor and/or qualified principal paleontologist. • Preparation of High-Resolution Geological Maps: The PRMMP shall require preparation of high-resolution maps that depict the geological formations/units underlying the SSFL. The maps shall detail the locations of high sensitivity Santa Susanna Formation (Tsu, Tsuv, and Tsi), the moderate to high lower Chatsworth Formation (Kcsh), and the moderate sensitivity detrital sediments of Lindero Canyon geological unit (Tls and Tlsc) where full-time monitoring is required, and the locations of low to moderate sensitivity upper Chatsworth Formation (Kcs) and low sensitivity Quaternary alluvium (Qa) where part-time monitoring is required. • Discovery and Fossil Recovery Procedures: The PRMMP shall present procedures for halting or redirecting remediation and setting up an exclusion zone with flagging tape when the paleontological monitor or construction personnel make a discovery if the monitor is not present. Provisions shall be included that identify notification procedures for unanticipated fossil discoveries by construction personnel when a paleontological monitor is not present and describe fossil recovery methods (including necessary equipment) and adequate data collection. The PRMMP shall emphasize the importance of collecting accurate geographic, stratigraphic, and sedimentologic data (including samples for radiometric dating if applicable).	During remediation The Annual Report shall be submitted to DTSC by April 1 for the previous calendar year.	Written notification to DTSC in the event of a fossil discovery Written documentation including paleontological resources-related reports, daily monitoring logs, sensitivity training materials and attendance rosters to be provided to DTSC for review Notify DTSC of paleontological discoveries DTSC within 24 hours Documentation to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting approved Paleontological Resources Monitoring and Mitigation Plan, including notices, reports, daily monitoring logs, sensitivity training materials and attendance rosters Field verification by DTSC or its designated contractor of implementation of PRMMP requirements

Mitigation Measure	Implementation		Enforcement	
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• Sampling: The PRMMP shall include sampling methods and frequency of sampling (e.g., collecting sediment samples for microfossil recovery per the SVP [2010] guidelines), as well as other applicable procedures. The qualified paleontologist overseeing the project shall determine if and when it is appropriate to test a horizon for the presence of microfossils based on sedimentologic indicators (abundant plant debris, fine-grained sediments, carbonate nodules, etc.). The test sample shall consist of approximately 600 pounds of sediment (or 0.4 cubic yards) to be screened onsite or offsite. If scientifically significant microfossils are recovered, a standard sample shall be collected and screened on or offsite (a standard sample is approximately 4 cubic yards or 6000 pounds per the SVP [2010] guidelines). Contaminated fossils should be safely handled to ensure worker health and safety. Specific safe handling procedures should be established in the PRMMP. • Post-Excavation Preparation, Analysis, Reporting, and Curation: The PRMMP shall discuss procedures for post-excavation preparation and analyses of fossil specimens collected during project-related excavations and shall provide analytical techniques. The report shall detail the identification of specimens, final curation of specimens at an accredited facility, data analyses, and reporting. The final monitoring report shall include a discussion of the background information for the project; the geology and stratigraphy of impacted geological units; mitigation methods, including fossil treatment and any recommendations for further work; a description and inventory of salvaged paleontological resources; scientific importance of the salvaged paleontological resources; the results and findings of analyses conducted on fossil remains; research questions that may be answered or raised as a result of the analyses; and pertinent maps with fossil localities. Maps showing fossil localities shall be included in a confidential appendix.				
Mitigation Measure CUL-18: Inadvertent Discovery of Human Remains. In the event of inadvertent discovery of human remains, all work shall be halted within a 100-foot radius and temporary protective measures shall be implemented. Avoidance and preservation in place shall be emphasized as the preferred manner of mitigation for human remains and disturbances shall be avoided to the maximum extent feasible as it relates to the project objectives of soil remediation, as determined by DTSC, in coordination with Interested Tribes and respective RPs. The RPs shall notify DTSC of any inadvertent discovery of human remains within 24 hours of the discovery. On non-federally owned land (Area I, Area III, Area IV, the Northern Undeveloped Area, and the Southern Undeveloped Area), the RPs shall contact the Ventura County Coroner to evaluate the remains and follow the procedures and protocols set forth in State Health and Safety Code Section 7050.5. If the Coroner determines the remains are Native American in origin, the Coroner shall contact the NAHC. As provided in PRC Section 5097.98, the NAHC shall identify the person or persons	During remediation If human remains are unearthed, the contractor shall notify DTSC within 24 hours	Contractors shall cease work immediately if human remains are unearthed. The contractor shall notify DTSC within 24 hours. Documentation of avoidance and/or treatment, as well as coordination between the RPs, DTSC, and Interested Tribes, and/or the Ventura County Coroner and NAHC, and/or NASA, if required, to be submitted to DTSC Documentation of actions taken to be provided to DTSC as part of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2)	DTSC	DTSC review of regular compliance reports and Cultural Resources-specific Annual Reports (as required by CUL-2) documenting avoidance and/or treatment of human remains as well as appropriate coordination as required Field verification by DTSC or its designated contractor of implementation of human remains requirements

Mitigation Measure	Implementation		Enforcement	
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believed to be most likely descended from the deceased Native American. The most likely descendent (MLD) shall be afforded the opportunity to provide recommendations concerning the future disposition of the remains and any associated grave goods as provided in PRC Section 5097.98. Per PRC Section 5097.98, 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 MLD regarding their recommendations, taking into account the possibility of multiple human remains. On federally owned land (Area II and the NASA-owned portion of Area I), NASA shall be notified and human remains and associated funerary objects shall be treated pursuant to the Native American Graves Protection and Repatriation Act and in accordance with Stipulation VIIB of the NASA Programmatic Agreement.				
Geology and Soils				
Mitigation Measure GEO-1: Geotechnical Evaluation. Prior to commencement of cleanup activities, site-specific geotechnical evaluations shall be developed, by the RPs, under the direction of DTSC, in accordance with applicable regulations. Each geotechnical evaluation shall be prepared by a registered geotechnical engineer and approved prior to implementation. DTSC shall work with Ventura County to facilitate review as necessary, based on the scope of the investigation. Specific measures to reduce the potential physical hazards associated with strong seismic ground shaking, liquefaction, subsidence, unstable soil conditions, temporary slopes and excavations, permanent slopes, and other earthwork-related conditions during cleanup shall be recommended in the report and implemented by the RPs.	Prior to construction of remediation systems requiring foundations	Submittal of site-specific geotechnical evaluations for DTSC approval	DTSC	Each site-specific geotechnical evaluation shall be reviewed and approved by DTSC in consultation with Ventura County
	During remediation	Documentation demonstrating implementation of the approved site-specific geotechnical evaluations Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting approved site-specific geotechnical evaluations Field verification by DTSC or its designated contractor of implementation of geotechnical requirements
Greenhouse Gas Emissions				
Mitigation Measure GHG-1: Recycling Requirement. To the maximum practical extent, recyclable materials, including non-hazardous debris, shall be reused or recycled.	Prior to remediation	Language to be included in contractor scopes of work	DTSC	DTSC review of regular compliance reports documenting recycling requirements
	During remediation	Documentation of ongoing visual inspections by the RPs or their designee/contractor Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of implementation of recycling requirements DTSC review of regular compliance reports documenting recycling requirements and visual inspections
Mitigation Measure GHG-2: On-Road Vehicle Fleet Requirements. The RPs (and their contractors), under the direction of DTSC, shall use trucks that are model year 2014 or newer or are certified to meet the emissions standards of a 2014 or newer on-road diesel heavy-duty vehicle. It would be permissible for RPs to utilize other vehicles that achieve the same or lower emission rate as a 2014 or newer on-road	At the time of mobilization of each applicable unit of equipment to the project site	Language to be included in the RPs' contractor scopes of work Written documentation, including copies of each unit's certified tier specification, BACT documentation, and CARB	DTSC	DTSC review of regular compliance reports documenting on-road fleet requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
diesel heavy-duty vehicle. as long as it is documented. A copy of each unit's certified tier specification, BACT documentation, and CARB operating permit shall be provided at the time of mobilization of each applicable unit of equipment. This requirement must be included in bid documents with the appropriate contractors and subcontractors.		operating permit to be provided to DTSC Documentation to be provided to DTSC as part of regular compliance reports		
Mitigation Measure GHG-3: Greenhouse Gas Emissions Reduction Plan. Before physical implementation of the project begins, the RPs, under the direction of DTSC, shall develop and implement a Greenhouse Gas Emissions Reduction Plan (GHG Plan) containing feasible strategies to reduce GHG emissions for the project to a less-than-significant level. Any reduction of GHG emissions used for compliance purposes (e.g., carbon credits) must be real, permanent, quantifiable, verifiable, enforceable, and additional pursuant to Health and Safety Code §38562(d)(1) and (2). As part of the GHG Plan, the RPs, under the direction of DTSC, shall require contractors implementing the cleanup activities to track hours, miles, fuel usage, or other suitable surrogate parameters related to the cleanup and calculate and report the resultant GHG emissions every month. Based on information obtained through this tracking system, the plan shall require the RPs, under the direction of DTSC, to implement, as needed, specifically identified measures to ensure that the project would not exceed, on a 12-month rolling basis, the threshold of 10,000 $MTCO_2e$. The measures shall include, but not be limited to, one or more of the following: • Seek opportunities for California forest preservation and the planting of new drought-tolerant, high-carbon sequestering, and/or native trees of appropriate size and type for properties in California, including in disadvantaged communities or land uses such as parks serving disadvantaged communities either onsite or offsite in Ventura County, Los Angeles County, or other counties where project-related emissions occur, that would result in a net sequestration of CO_2 emissions. • Seek opportunities for offsetting GHG emissions from existing sources, including sources located in disadvantaged communities or sources serving disadvantaged communities in Ventura County, Los Angeles County, or other counties where project-related emissions occur. Examples may include but are not limited to implementing methane capture and destruction programs at dairy farms, coordinating with local transportation agencies and property owners and establishing electric vehicle supply equipment (EVSE) at park-and-ride lots or other appropriate locations, coordinating with local transportation agencies and school districts and replacing diesel- or gasoline-fueled buses with less-polluting technologies such as compressed natural gas, electric, hybrid-electric, fuel cell, or other commercially available technologies, or other GHG emissions offset programs. • Review, at least once a year, commercial availability and feasibility of alternatives to diesel-powered on-road and off-road equipment. If	Prior to remediation	Submittal of a GHG Plan for DTSC approval	DTSC	The GHG Plan shall be reviewed and approved by DTSC DTSC review of regular compliance reports documenting approved GHG Plan
	During remediation	Documentation of the approved GHG Plan implementation, including tracking system for hours, miles, fuel usage, or other suitable surrogate parameters and monthly reports of the resultant GHG emissions and any measures taken to mitigate GHG emissions Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting approved GHG Plan, including monthly tracking logs and monthly report of actual GHG emissions and any measures taken to reduce emissions

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
commercially available and feasible in the region, contractors shall be required to use equipment capable of performing the cleanup activities in a comparable manner (with respect to time, safety, equipment power requirements, etc.), which results in appreciable GHG reductions, but does not result in the increase of criteria pollutant emissions to above daily regional thresholds. • Purchase carbon credits from a reputable carbon market. Priority should be given to those credits generated within the vicinity of SSFL, and in decreasing preference, credits generated within the region, in-state, and out-of-state. The plan shall devise mitigation with a priority on fiscal considerations in order to reserve project funds, to the extent feasible, for actual cleanup activities. The plan may also include provisions to seek grant funding or other mechanisms to leverage other existing programs that address energy reduction or urban forestation.				
Hazards and Hazardous Materials				
Mitigation Measure HAZ-1: Health and Safety Plan. A Health and Safety Plan (HSP) shall be developed by the RPs and implemented for the proposed activities and will include the following: • General hazard controls • Monitoring requirements • Project-specific hazard controls such as asbestos, lead-based paint, and earthmoving equipment • Traffic control • Physical hazard controls such as noise and temperature extremes • Biological hazard controls Designated areas for chemical storage and handling shall be identified. The plan shall be reviewed for the project activities and shall include procedures to mitigate potential hazards, measures that provide protection from physical hazards, measures that provide protection from chemical hazards that might be present at the site, decontamination procedures, and worker and health and safety monitoring criteria to be implemented during project activities, if needed. Per29 CFR Part 1910, Hazardous Waste Operations and Emergency Response Standard, safety training for site workers must be met in order to conduct cleanup or emergency response operations. Associated worker safety training shall occur before ground-disturbing activities began. Work zones shall be marked clearly with barricades or construction fencing to control unauthorized access to the areas. In addition, if dust or chemical monitoring is required during demolition or during soil and groundwater cleanup operations, it will be implemented according to the site-specific HSP, which will list the proper action limits at which controls shall be required.	Prior to remediation	Submittal of a Health and Safety Plan RPs to conduct associated worker safety training. Written documentation of required training, including attendance rosters, to be kept onsite and made available to DTSC upon request	DTSC	The Health and Safety Plan shall be reviewed by DTSC DTSC review of regular compliance reports documenting Health and Safety Plan
	During remediation	Documentation of the Health and Safety Plan implementation including ongoing visual inspections by the RPs or their designee/contractor Documentation of dust or chemical monitoring, if required Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of HSP implementation DTSC review of regular compliance reports documenting approved Health and Safety Plan

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Mitigation Measure HAZ-2: Hazardous Materials Containment. To ensure appropriate containment of excavated materials that exceed state or federal hazardous waste criteria (Title 22 California Code of Regulations Sections 66261.20 through 66261.31), such materials shall be placed in lined, sealed containers or wrapped and enclosed by tarps and transported by licensed hazardous waste haulers and disposed of at a licensed hazardous waste management facility approved for the specific hazardous materials to be disposed of. Truck drivers must be licensed to transport and have the proper training and registration by the State, and as applicable to the material they will be transporting. Trucks transporting hazardous waste are required to maintain a hazardous waste manifest that describes the content of the materials. These manifests will be prepared, signed, and supplied by the RPs to the hazardous waste transporter who will sign the manifests before the materials leave the property. The contracted trucking company will be a certified hazardous waste transportation contractor, if the material is profiled as hazardous. All trucks carrying hazardous waste will also be required to display a yellow flag that will be visible to pedestrians. A log of manifest data will be maintained on-site and made available to DTSC for inspection upon request. Copies of the manifests will be submitted to DTSC for filing.	During remediation	Written documentation through a log of manifest data for export trucks, including vehicle license plates and time of departure Verification of registration that haul truck drivers are licensed to transport hazardous waste if load is characterized as hazardous waste Copies of manifests shall be submitted monthly to DTSC for review Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designee/ contractor of implementation of Hazardous materials containment requirements DTSC review of regular compliance reports documenting logs, with vehicle license plates and time of departure
Mitigation Measure HAZ-3: Hazardous Materials Business Plan. As required by California Health and Safety Code Chapter 6.95 and the California Code of Regulations, Title 19, a Hazardous Materials Business Plan shall be developed by each RP, under the direction of DTSC. These plans shall describe appropriate storage, containment, and safety protocols for use of hazardous materials during the remediation; emergency procedures to be followed in the event of a release; instructions for performing fueling and maintenance operations on vehicles and equipment onsite; and other protocols so that hazardous materials shall be stored and handled appropriately.	Prior to remediation	Submittal of a Hazardous Materials Business Plan for DTSC approval	DTSC	The Hazardous Materials Business Plan shall be reviewed and approved by DTSC DTSC review of regular compliance reports documenting approved Hazardous Materials Business Plan
	During remediation	Documentation of the approved Hazardous Materials Business Plan implementation Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting approved Hazardous Materials Business Plan
Mitigation Measure HAZ-4: Fire Management Plan. A Fire Management Plan shall be prepared by the RPs, for proposed cleanup, demolition, soil and debris hauling, monitoring, and maintenance activities located at the project site and along proposed haul routes in High Fire Severity Zones. The plan shall include but not be limited to the following: • The name and contact information of a Fire Control Coordinator who shall be assigned to the project. • A list of numbers to call in case of a fire, including 911 (or the equivalent in the area). • Alternative communication methods for areas of the site that do not have reliable cellular phone service.	Prior to remediation	Submittal of a Fire Management Plan for DTSC approval	DTSC	The Fire Management Plan shall be reviewed and approved by DTSC DTSC review of regular compliance reports documenting approved Fire Management Plan
	During remediation	Documentation of implementation of the approved Fire Management Plan, including daily safety meetings Attendance rosters shall be made available to DTSC upon request	DTSC	DTSC review of regular compliance reports documenting approved Fire Management Plan Ongoing field verification by DTSC or its designated contractor of Fire Management Plan

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
• A complete list, including storage locations, of all tools and equipment the Contractor will use in the event of a fire within project limits. • Methods that shall be employed if a fire is encountered or started during activities within the project limits. • Specific fire prevention precautions, and the required firefighting equipment, for activities that have the potential for starting a fire. At a minimum, the plan shall address prevention planning related to use of heavy equipment, vehicles, flammable chemicals and gases, hand tools, storage, and parking areas. • Provisions for field safety meetings. The Contractor shall conduct field safety meetings (also known as toolbox or tailgate meetings) daily. The Contractor shall require participation by all persons working at the project site. Participants shall discuss specific fire prevention precautions for remediation activities. • All provisions of the plan shall be applicable to cleanup crews and activities and monitoring/maintenance crews and activities.		Documentation to be provided to DTSC as part of regular compliance reports		
Hydrology and Water Quality				
Mitigation Measure HYDRO-1: Stormwater Pollution Prevention Plan (SWPPP). Site activities shall take place in accordance with the statewide General Permit for Stormwater Discharges Associated with Construction Activity (Order No. 2022-0057-DWQ [NPDES No. CAS000002]). As required by this permit and prior to implementation of remediation activities, the RPs shall submit a Notice of Intent, followed by submission of a SWPPP to the LARWQCB for their review. The SWPPP would specify site-specific BMP's to address and protect stormwater runoff and to minimize erosion during cleanup activities. The BMP's typically include silt fences, sand bags, straw waddles, fiber rolls, stockpile management, spill prevention and control, runoff controls, containment for chemical storage areas, equipment decontamination procedures, and the use of protective sheeting or tarps prior to a rain event on steep slopes. BMP's shall minimize erosion from destabilization of disturbed surfaces. The RPs shall also continue monitoring drainages for increased sediment load and contaminants in accordance with the existing NPDES Permit No. CA0001309 for stormwater discharges related to past industrial activity during each RP's remediation activities.	Prior to remediation	Documentation of approved General Permit for Stormwater Discharges Associated with Construction Activity, Notice of Intent, and SWPPP by LARWQCB to be forwarded to DTSC Documentation to be provided to DTSC as part of regular compliance reports	DTSC in consultation with LARWQCB	DTSC review of regular compliance reports documenting submission and LARWQCB approval of a General Permit for Stormwater Discharges Associated with Construction Activity, and SWPPP
	During remediation	Documentation of implementation of the General Permit for Stormwater Discharges Associated with Construction Activity requirements and SWPPP BMP's, including monitoring logs documenting onsite drainage monitoring results to be submitted to DTSC Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of implementation of General Permit, SWPPP, and BMP requirements DTSC review of regular compliance reports documenting General Permit requirements and SWPPP BMP's, including monitoring logs
Mitigation Measure HYDRO-2: Operations and Maintenance Plan (O&M Plan). To monitor the effectiveness of the implemented remedial actions, groundwater, surface water, and soil vapor monitoring shall be performed consistent with a DTSC-approved O&M Plan. The groundwater-monitoring portion of the O&M Plan shall consist of monitoring and sampling of wells. New monitoring wells shall be constructed in accordance with the California DWR Well Standards Bulletin 74-90, Ventura County Well Ordinance 4184, and the 2014	Prior to remediation	Submittal of an Operations and Maintenance Plan for DTSC's review and approval Documentation to be provided to DTSC as part of regular compliance reports	DTSC	The Operations and Maintenance Plan shall be reviewed and approved by DTSC DTSC review of regular compliance reports documenting approved Operations and Maintenance Plan
	During remediation	Monitoring reports documenting the results of onsite groundwater, surface	DTSC	DTSC review of regular compliance reports documenting approved

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
DTSC Well Design and Construction for Monitoring Groundwater at Contaminated Sites. Reports shall be prepared and submitted to DTSC that present the monitoring and sampling results and, as necessary, recommendations for modifications to the monitoring program, or additional remedial actions. Post-remediation monitoring requirements for soil corrective actions may consist of periodic inspections to monitor permanent caps or covers (if used) and periodic sampling to assess soil concentrations following natural degradation processes (if selected).		water, and soil monitoring, as well as recommendations for modifications to the monitoring program, or additional remedial actions, as necessary, to be submitted to DTSC Documentation to be provided to DTSC as part of regular compliance reports		Operations and Maintenance Plan, including monitoring reports recording onsite groundwater, surface water, and soil monitoring and well sampling results and recommendations
	Post remediation	Monitoring reports documenting periodic inspections to monitor permanent caps or covers (if used) and periodic sampling to assess soil concentrations following natural degradation processes (if selected), to be submitted to DTSC Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting post-remediation monitoring requirements consisting of periodic inspections as outlined in this mitigation
Noise and Vibration				
Mitigation Measure NOISE-1: **Area I Cleanup Hours.** Cleanup activities within 1,000 feet of the northern boundary of Area I shall be prohibited between the hours of 7:00 p.m. to 7:00 a.m. Monday through Friday, and from 7:00 p.m. to 9:00 a.m., Saturday, Sunday, and local holidays. Figure 4.10-4 shows the location of the 1,000-foot nighttime avoidance area.	During remediation	Language to be included in contractor scopes of work Documentation of visual inspections by the RPs or their designated contractor through monitoring logs that describe times and location of cleanup activities Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of work hour prohibitions DTSC review of regular compliance reports documenting monitoring logs
Mitigation Measure NOISE-2: **Area I Noise Barrier.** Temporary noise barriers shall be used, as feasible (including securing permission from the property owner), to block the line-of-sight between the Sage Ranch Park ranger's house and campsites (located north of Area I). The height of the noise barriers must be sufficient to block the line-of-sight.	During remediation	Documentation of ongoing visual inspections by the RPs or their designated contractor through monitoring logs including photographs of noise barriers Written verification, including copies of written permission and communications with property owners Documentation to be provided to DTSC as part of regular compliance reports	DTSC	Ongoing field verification by DTSC or its designated contractor of noise barrier implementation DSC review of regular compliance reports documenting monitoring logs and copies of written permission and communications with property owners
Mitigation Measure NOISE-3: Haul Route Noise Barrier. The RPs, with approval from property owners, shall install temporary noise barriers to block the line-of-sight between the hauling trucks and noise sensitive receivers along Woolsey Canyon Road and Facility Road. The noise level at a receiver will be reduced by a minimum of 5 dB with a noise barrier height sufficient to block the line-of-sight.	During remediation	Documentation of ongoing visual inspections by the RPs or their designated contractor through monitoring logs including photographs of noise barriers	DTSC	Ongoing field verification by DTSC or its designated contractor of noise barrier implementation DTSC review of regular compliance reports documenting monitoring logs

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
		Written verification, including copies of written permission and communications with property owners Provide documentation to DTSC as part of regular compliance reports		and copies of written permission and communications with property owners
Transportation				
Mitigation Measure TRANS-1: Site-Wide Traffic Management Plan. Prior to the beginning of remediation activities, the RPs shall prepare a comprehensive Site-Wide Traffic Management Plan that identifies common traffic-control requirements for onsite deliveries and offsite hauling to facilitate safe and efficient traffic flow within SSFL and on public roadways, including during any wildfire emergency. This plan shall be submitted to DTSC for review. The criteria for haul routes shall avoid direct routing through sensitive habitat areas and areas with residential dwellings, schools, and bike routes unless no alternative is available. The Plan shall establish, list, and map the trucking routes, days and hours of truck operation, maximum number of trucks per day, and various requirements to provide traffic, pedestrian, and bicycle safety. Truck operators shall be provided with a trucking route map and hours of operation allowed. The Plan shall designate an onsite coordinator for project activities. The Plan shall provide specific traffic-control measures, signs, and delineators to be implemented by the construction contractor(s) through the duration of cleanup activities. In addition, the RPs, under the direction of DTSC, shall be responsible for funding and overseeing trip reduction programs and strategies for employees and contractors of the RPs performing remediation activities at the SSFL site. At a minimum, the Plan shall include, but would not be necessarily limited to, the following elements: a. Limit the daily maximum number of trucks visiting the site for export and import of materials to 96 round trips (resulting in 192 total trips) per day. b. Limit use of public roads by trucks associated with the remediation activities under the proposed project to off-peak traffic hours (i.e., hours other than 7:15 to 8:15 a.m. and 4:45 to 5:45 p.m.). c. Limit truck activity associated with the remediation activities under the proposed project to weekdays (Monday through Friday) only. d. Install either a signed/striped crosswalk with warning lights or a temporary traffic signal at the intersection of Roscoe Boulevard/Hillary Drive to provide improved safety for crossing pedestrians. e. Install warning signs that state: “Truck activity ahead. Bicyclists use caution or alternative route;” this way bicycle riders on the segment of Valley Circle Boulevard between Roscoe Boulevard and Lake Manor Drive would be made aware of the presence of the trucking operations.	Prior to remediation	Submittal of a Traffic Management Plan for DTSC approval	DTSC	The Traffic Management Plan shall be reviewed and approved by DTSC
	During remediation	Written verification through a log of trip trucking routes, days and hours of truck operation, and number of trucks per day Establishment of a designated onsite coordinator Documentation of ongoing visual inspections by the RPs or their designated contractors through monitoring logs that document signs and delineators Documentation of notices to workers of available incentives for trip reduction programs and computerized commuter rideshare matching services Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting approved Traffic Management Plan including monitoring logs, notices of rideshare programs and services, and other documents resulting from the implementation of this mitigation measure Ongoing field verification by DTSC or its designated contractor of implementation of Traffic Management Plan requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
f. Alert project contractors/truck drivers to the presence of bicyclists on area roadways, particularly on the 1.1 mile segment of Valley Circle Boulevard between Woolsey Canyon Road and Roscoe Boulevard. g. As feasible, Boeing shall use backfill material from borrow areas located in the Southern Undeveloped Area of the SSFL site. h. To reduce the overall number of trucks traveling to and from the site, as feasible, trucks used to haul contaminated soil away from the site shall arrive at the site loaded with clean backfill. i. Funding and/or overseeing the following trip reduction programs or strategies for employees and contractors of the RPs performing remediation activities at the SSFL site: • Establishment of carpool, buspool, or vanpool programs • Cash allowances, passes, or other public transit subsidies and purchase incentives. • Computerized commuter rideshare matching services.				
Mitigation Measure TRANS-2: Public Roadway Repair. The RPs, under the direction of DTSC, shall be responsible for restoring all public roads, easements, rights-of-way (ROWs) and infrastructure (such as signs, utility poles, etc.) within the public road ROWs that have been damaged from project-related activities or traffic through implementation of a Road Restoration Plan. Restoration shall be to original or near-original pre-project condition and undertaken in a timely manner, in consultation with the City of Los Angeles, County of Los Angeles, City of Simi Valley, County of Ventura, and Caltrans, as appropriate. At a minimum, the RPs shall: a. Provide a video log of the proposed haul route. b. Determine the current Pavement Condition Index (PCI) of the haul route roadways. c. Propose locations to place traffic axle counters to measure project-related traffic. d. Identify the funding mechanism for identified roadway maintenance. The RPs shall be responsible for all costs. e. Identify the frequency (semi-annual or annual) of road inspections during remediation activities and a mechanism for investigating complaints related to substantial road damage.	Prior to remediation Baseline road conditions shall be established at least 30 days prior to the start of remediation	Submittal of Road Restoration Plan for DTSC approval in consultation with affected jurisdictions, and Caltrans Document baseline road conditions of proposed haul routes by photographing, videotaping, or otherwise documenting existing conditions of all affected public roads, easements, ROW segment(s), and intersections Copies of Roadway Repair Agreement between the RPs and the city and county Public Works Departments to be provided to DTSC Copies of the Encroachment Permit, and of the posted cash damage bond to be provided to DTSC Documentation to be provided to DTSC as part of regular compliance reports	DTSC, in consultation with Caltrans	The Road Restoration Plan shall be submitted for DTSC's review and approval in consultation with affected jurisdictions and Caltrans DTSC review of regular compliance reports documenting approved Road Restoration Plan requirements including documentation of baseline road conditions, RPs consultation efforts with affected jurisdictions and Caltrans, and copies of Encroachment Permits, and verification of cash damage bond posting Ongoing field verification by DTSC or its designated contractor of Road Restoration Plan requirements
At least 30 days prior to the start of cleanup activities, the RPs, under the direction of DTSC, shall establish baseline road conditions by photographing, videotaping, or otherwise documenting existing conditions of all affected public roads, easements, ROW segment(s), and intersections, and shall provide the City of Los Angeles, County of Los Angeles, City of Simi Valley, County of Ventura, and Caltrans (if applicable) a copy of these documents. Prior to the start of remediation activities, the RPs, under the direction of DTSC, shall enter into a Roadway Repair Agreement with the City and County Public Works	Prior to DTSC certification that each RP has completed its portion of cleanup activities	Consultation with affected jurisdictions and Caltrans including implementation of a schedule for repairs or compensation and a letter to DTSC from affected jurisdictions and Caltrans stating their concurrence with repairs/ compensation Compliance with monitoring plans in consultation with the affected jurisdictions and Caltrans	DTSC	DTSC review of regular compliance reports documenting approved Road Restoration Plan including RPs consultation efforts with affected jurisdictions and Caltrans, compliance with the schedule and verifying concurrence with repairs/ compensation

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
Departments in a form of documentation acceptable to each agency, secure an Encroachment Permit, and post a cash damage bond. Prior to DTSC certification that each RP has completed its portion of cleanup activities, the RPs shall meet with the City of Los Angeles, County of Los Angeles, City of Simi Valley, County of Ventura, and Caltrans (if applicable) to review the baseline road conditions and identify sections of public ROW that may have been damaged by project activities. At that time (prior to DTSC certification that each RP has completed its portion of cleanup activities), the RPs shall establish a schedule to complete the repairs or compensate the City of Los Angeles, County of Los Angeles, City of Simi Valley, County of Ventura, or Caltrans in accordance with the Roadway Repair Agreement. An Encroachment Permit from Caltrans shall be obtained for any repair work performed within the State right-of-way and any modifications to State facilities must meet all mandatory design standard and specifications. Following completion/compensation of the identified public ROW repairs, the RPs shall provide a letter to DTSC from affected jurisdictions (City of Los Angeles Department of Transportation, County of Los Angeles Department of Public Works, City of Simi Valley Department of Public Works, County of Ventura Public Works Agency, and Caltrans) stating their concurrence with the repairs/compensation. Compliance with monitoring plans shall be verified by DTSC, in consultation with the City and County of Los Angeles, City of Simi Valley, County of Ventura, and Caltrans.		Documentation to be provided to DTSC as part of regular compliance reports		Ongoing field verification by DTSC or its designated contractor of Road Restoration Plan requirements
Energy Consumption				
Mitigation Measure EC-1: Energy Conservation - New Onsite Facilities. The following measures shall be implemented by the RPs, under the direction of DTSC, to conserve electricity for new onsite facilities to be used for office functions (assumed to be trailers or other prefabricated non-permanent structures) by the RPs or their contractors for administration of cleanup activities: a. Exterior walls on all temporary office buildings shall be insulated and be equipped with Energy Star® rated double-paned insulated glass windows. b. Exterior doors on temporary office buildings shall be solid core insulated and sealed with weather stripping. c. White reflective roofing or covering shall be included on all temporary office buildings. d. LED light bulbs shall be used for project office lighting and outdoor office security lighting, as appropriate. e. Dusk-to-dawn outdoor sensors and/or motion activated sensors shall be used for all outdoor project security lighting, as appropriate. f. Motion-activated light switches or automatic shut-off timers shall be used for all indoor project office lighting. g. All refrigerators and other kitchen appliances used onsite for the project shall be Energy Star® rated, as applicable.	Prior to remediation	Language to be included in contractor scopes of work Documentation of all energy conservation measures planned for new onsite facilities to be submitted to DTSC Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting energy conservation measures as outlined in this mitigation measure
	During remediation	Documentation of implementation of energy conservation measures for new onsite facilities to be submitted to DTSC Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting energy conservation requirements Ongoing field verification by DTSC or its designated contractor of implementation of energy conservation requirements

Mitigation Measure	Implementation		Enforcement	
	Schedule/ Timing	Reporting Requirements	Responsibility	Method of Verification
h. Offices shall include programmable thermostats with occupancy sensors that shut off the HVAC system when vacant.				
Mitigation Measure EC-2: Energy Conservation – New Onsite Equipment. The following measures shall be implemented by the RPs, under the direction of DTSC, to conserve electricity for new equipment that would be used for project activities: a. The newest commercially available models for all pumps, vacuums, and blowers shall be used to implement soil vapor extraction/air sparging, bioventing, and gaseous electron donor injection. b. Pumps, vacuums, and blowers used to implement soil vapor extraction/air sparging, bioventing, and gaseous electron donor injection shall be sized such that smallest specified horsepower or kilo wattage is used, as appropriate.	Prior to mobilization of equipment to the site	Language to be included in contractor scopes of work RPs to provide a list of all equipment to be used onsite, including date of make for DTSC to verify whether the equipment is the newest commercially available model Documentation to be provided to DTSC as part of regular compliance reports	DTSC	DTSC review of regular compliance reports documenting a list of all equipment to be used on site to ensure the newest commercially available model equipment are used
	During remediation	Documentation for each equipment, from the manufacturer (include model date), to be kept onsite and made available to DTSC, upon request	DTSC	Ongoing field verification by DTSC or its designated contractor at the time of mobilization of equipment to the site, and periodically during remediation, to ensure the newest commercially available model equipment are used