

## **5.2 Developing Mitigation Measures and a Monitoring Program**

To establish appropriate mitigation measures and the associated monitoring program, the campus should be aware of the natural resource-related impacts of any project when developing the project description. Developing the project description is in fact the campus's first opportunity to eliminate potential impacts.

As more information becomes available through analysis of environmental issue areas during preparation of the environmental document, those responsible for funding and implementing mitigations should be advised of potential impacts, and their assistance should be enlisted in developing mitigation measures and determining appropriate levels of campus responsibility for the measures.

It is very important to consult with those who will be responsible for implementing mitigation measures. They can provide advice as to whether a proposed mitigation is feasible, affordable, or too restrictive to enable appropriate flexibility in compliance. The objective is to reduce environmental impacts, NOT to require unnecessary additional paperwork. There may be reporting systems on construction for example, or existing reporting required by regulatory agencies which could satisfy information needed for mitigation. The link between impacts, mitigation measures and changes in levels of significance should be described in the Draft EIR environmental issue sections and the Summary Table of Impacts and Mitigations. This process establishes a clear link between impacts, mitigation measures, levels of significance before and after mitigation and monitoring requirements.

After agencies and/or the public submit comments on the Negative Declaration or Draft EIR, the campus may further develop or refine mitigation measures. These measures then become part of the final environmental document. Mitigation measures adopted as conditions of approval become part of the project and are legally binding. As the campus finalizes mitigation measures, it should simultaneously develop a Mitigation Monitoring Program to be adopted when the project is approved and the environmental document approved or certified. The Mitigation Monitoring Program should assign responsibility for monitoring both on and off-campus mitigation measures. This document may be included as part of the final environmental document, or it may be reproduced separately.

### **Practical Considerations**

- When developing the project description, consider potential physical impacts to the environment and design the project in such a way that they are eliminated where possible, or minimized.
- During preparation of the environmental document, assemble information about potential impacts. Begin to conceptualize how these impacts will be mitigated and how mitigation measures will be monitored.
- Advise Vice Chancellors and other campus staff about major impacts. Enlist their support in developing appropriate mitigation measures and determining the campus's share of responsibility for mitigation and ability/willingness to finance mitigation measures.

- In the environmental document, correlate the impacts and mitigation measures by number and state the level of significance before and after mitigation.
- After receiving comments on the environmental document, refine mitigation measures as needed.
- Develop a mitigation monitoring program by establishing appropriate monitoring requirements for each mitigation measure and assigning responsibility for implementation.
- Produce a Mitigation Monitoring Program document to be included within or accompany the final environmental document in the approval and certification process.

Mitigation measures are generally effective when they contain the following five elements\*:

Why: state the objective of the mitigation measure and why it is recommended.

What: Explain the specifics of the mitigation measure and how it will be designed and implemented.

- identify measurable performance standards by which the success of the mitigation can be determined.
- provide for contingent mitigation as appropriate if monitoring reveals that the success standards are not satisfied.

Who: Identify the agency, organization or individual responsible for implementing the measure.

Where: Identify the specific location of the mitigation measure

When: Develop a schedule for implementation

\* Source: Herson, Al and Bogdan, Kenneth, "Mitigating Environmental Impacts: Law, Policy and Practice", UC Davis Extension, January 31, 1996