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Mitigation Monitoring and Reporting Program  
to the Final Mitigated Negative Declaration

# San Dieguito River Park Osuna Segment of the Coast to Crest Trail Project

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MARCH 2024



Prepared by:

San Dieguito  
River Park 

*SAN DIEGUITO RIVER PARK  
JOINT POWERS AUTHORITY  
8372 Sycamore Creek Road  
Escondido, CA 92025*

SCH# 2023050120



# Mitigation Monitoring and Reporting Program

California Environmental Quality Act (CEQA) Section 21081.6(a)(1) requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of a mitigated negative declaration (MND) or environmental impact report (EIR) to ensure that the mitigation measures are implemented. The MMRP specifies what the mitigation is, the entity responsible for monitoring the program, and when during the process it should be accomplished.

This MMRP is designed to ensure compliance with California Public Resources Code Section 21081.6(a)(1) during implementation of mitigation measures. The MMRP for the Osuna Segment of the Coast to Crest Trail Project is under the jurisdiction of the San Dieguito River Park Joint Powers Authority (JPA) and subject to a project Site Development Permit (SDP) and grading permit from the City of San Diego (City). This MMRP identifies the responsible party for monitoring, what is to be monitored, how monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements.

A record of the MMRP will be maintained at the offices of the San Dieguito River Park JPA at 18372 Sycamore Creek Road, Escondido California 92025. All mitigation measures outlined in **Table 1, Mitigation Monitoring and Reporting Program**, will be made conditions of approval of the project permits as further described below. Some details and clarifications have been added to Table 1 since adoption of the Final MND to aid in implementation of the project SDP and a list of applicable City definitions are identified below:

Acronym	Definition
BCME	Biological Construction Mitigation/Monitoring Exhibit
CD	Construction Document
DSD	Development Services Department
ED	Environmental Designee
MMC	Mitigation Monitoring Coordination
NTP	Notice To Proceed
QB	Qualified Biologist
RE	Resident Engineer
SDP	Site Development Permit

## 1. General Requirements

As required by the project SDP and/or grading permit, prior to the issuance of a Notice To Proceed (NTP) or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CDs) to ensure the MMRP requirements are incorporated into the design.

## 2. Preconstruction (Precon) Meeting

As required by the project SDP and/or grading permit, the JPA will arrange and perform this meeting by contacting the appropriate City staff as identified in the SDP and grading permit including the City's

MITIGATION MONITORING COORDINATION (MMC) staff and CITY RESIDENT ENGINEER (RE). Attendees will include the JPA’s Representative(s) and contractors, Job Site Superintendent, and the following JPA consultants:

- Qualified Biologist (QB)
- Qualified Native American Monitor

### 3. Monitoring Exhibits

As required by the project SDP and grading permit, the JPA will submit to City MMC a BIOLOGICAL MONITORING EXHIBIT (BCME) on an 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline’s work, and notes indicating when in the construction schedule that work will be performed.

### 3. Submittals and Inspections Required by City MMC

As required by the project SDP, the JPA or its representative shall submit all required documentation, verification letters, and requests for all associated inspections required by the project permits to the City’s MMC as required for approval per the following schedule:

Issue Area	Document Submittal	Associated Inspection/Approvals/Notes
General	Consultant Qualification Letters	Prior to Precon Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biological Resources	Biologist Limit of Work Verification	Limit of Work Inspection
Biological Resources	Biology Reports	Biology/Habitat Restoration Inspection
Tribal Cultural Resources	Archaeology Reports	Archaeology/Historic Site Observation

**Table 1 Mitigation Monitoring and Reporting Program, Osuna Trail (MND SCH# 2023050120)**

Resource Area	Impact	Mitigation Measure	Monitoring or Reporting Action	Monitoring Responsibility	Timing
<b>BIOLOGICAL RESOURCES</b>	Potential for direct impacts to occur because of grading for the trail and installation of bridge abutments.	<b>MM-BIO-1: Upland Mitigation.</b> To compensate for direct impacts to 0.47 acres of Tier II coastal sage scrub habitat the project will provide onsite restoration/revegetation of coastal sage scrub vegetation, within the side slopes and margins of the trail, as well as within non-native habitat areas adjacent to the trail. Where disturbed habitat and non-native vegetation (i.e., tamarisk and ornamental vegetation) exist adjacent to the trail, the non-native species will be removed, and the areas will be revegetated and enhanced with native species. A minimum of 0.47 acres of CSS mitigation compensation will be required onsite to compensate for these impacts. The project proposes to restore and enhance 0.49 acres of upland CSS vegetation through removal of exotic species and revegetation, which includes establishment of CSS within the trail slopes. The proposed upland mitigation meets and exceeds the required mitigation acreage, as shown on BTR Figure 5A. The project will implement the upland restoration and enhancement program shown on the revegetation planting and irrigation plans, including in BTR Appendix E.	Comply with final Habitat Restoration plan sheets and requirements.  Report to permit authorities as required by project permits including the City's SDP which includes submittal of a BCME/report to the satisfaction of the City MMC.	The JPA shall be responsible for restoration/revegetation and preparation of a submittal of a BCME/report. The City MMC shall be responsible for reviewing the BCME/report.	<ul style="list-style-type: none"> <li>Prior to construction activities (BCME/report submittal to City MMC)</li> <li>During construction activities (on-site restoration)</li> <li>Within 30 days of construction completion (final BCME/report submittal to City MMC)</li> </ul>
	Potential for permanent and temporary impacts to sensitive riparian habitats from	<b>MM-BIO-2: Wetland Mitigation.</b> To compensate for the direct impacts to 0.173 acres of wetlands and non-wetland waters, including open water, the project will provide reestablishment (i.e., restoration) of the side slopes and margins of the trail,	Comply with wetland restoration and enhancement program shown on the project landscape plans and irrigation plans.	The JPA shall be responsible for implementation of the wetland restoration and enhancement program. The City MMC	<ul style="list-style-type: none"> <li>Prior to issuance of a NTP for any construction permits (JPA plan submittal with</li> </ul>

Resource Area	Impact	Mitigation Measure	Monitoring or Reporting Action	Monitoring Responsibility	Timing
	<p>construction activities.</p>	<p>where the trail passes through existing wetlands, and non-native riparian and arundo-dominated riparian vegetation communities. These areas will be restored with wetland and riparian vegetation. In addition, within areas outside of the trail footprint, where Non-Native Riparian, Arundo-dominated Riparian and Tamarisk Scrub communities exist, the non-native species will be removed and/or treated, and enhanced (i.e. rehabilitated) through revegetation with appropriate wetland and riparian vegetation. A minimum of 0.308 acres of wetland mitigation compensation is required, as shown in BTR Table 12, composed of wetland restoration (i.e. reestablishment) and enhancement (i.e. rehabilitation). The project proposes to restore (i.e., reestablish) 0.17 acres of wetlands and enhance (i.e., rehabilitate) 0.17 acres of wetlands through exotic species removals and revegetation, for a total of 0.34 acre of wetland mitigation which exceeds the required mitigation acreage of 0.308 by 0.032 acre. The project will implement the wetland restoration and enhancement program shown on the revegetation planting and irrigation plans, included in BTR Appendix E.</p>	<p>Report to permit authorities as required by project permits including the City's SDP which includes submittal of a final BCME/report to the satisfaction of the City MMC.</p>	<p>shall be responsible for reviewing the project permits and plans and the BCME/report.</p>	<p>approved mitigation plan)</p> <ul style="list-style-type: none"> <li>• Prior to construction activities (BCME/report submittal to City MMC)</li> <li>• During construction activities (on-site restoration)</li> <li>• Within 30 days of construction completion (final BCME/report submittal to City MMC)</li> </ul>
	<p>Potential for project construction activities to inadvertently disturb areas outside the limits of grading.</p>	<p><b>MM-BIO-3: Installation of Temporary Fencing.</b> Prior to the start of construction, to prevent inadvertent disturbance to areas outside the limits of grading,, the contractor shall install temporary orange construction fencing along the limits of grading.</p>	<ul style="list-style-type: none"> <li>• List in SDP conditions.</li> <li>• Install per project construction plans.</li> <li>• QB shall monitor construction activities to ensure compliance and provide a letter to the City MMC verifying proper installation.</li> </ul>	<p>The JPA shall be responsible for fence installation, QB monitoring, and fence removal. The City MMC shall be responsible for verifying proper installation.</p>	<ul style="list-style-type: none"> <li>• Prior to construction activities (fence installation and reporting to permit authorities)</li> <li>• During construction (QB monitor)</li> </ul>

Resource Area	Impact	Mitigation Measure	Monitoring or Reporting Action	Monitoring Responsibility	Timing
			<ul style="list-style-type: none"> <li>Report to permit authorities as required by project permits including SDP.</li> </ul>		<ul style="list-style-type: none"> <li>After construction activities (fence removal).</li> </ul>
	Potential for trail users to inadvertently disturb areas outside the limits of trail.	<b>MM-BIO-4: Installation of Permanent Fencing.</b> To prevent inadvertent disturbance to areas outside the limits of trail following construction, the contractor shall install permanent fencing as shown on the project engineering grading plans, provided under separate cover.	<ul style="list-style-type: none"> <li>Install per project construction plans.</li> <li>Monitor construction activities to ensure compliance.</li> </ul>	JPA shall be responsible for implementation of these measures. The JPA and City MMC shall be responsible for ensuring compliance.	<ul style="list-style-type: none"> <li>During construction.</li> <li>Fencing shall be installed prior to trail opening.</li> </ul>
	Potential for project construction activities to inadvertently disturb areas outside the limits of grading.	<b>MM-BIO-5: Construction Monitoring and Reporting.</b> At the start of construction, to prevent inadvertent disturbance to areas outside the limits of grading, all disturbance of native habitat shall be monitored by a biologist. The QB(s) shall be contracted with the JPA to perform biological monitoring during all clearing, grubbing and construction activities. The QBs shall perform the following duties: <ul style="list-style-type: none"> <li>a. Attend the pre-construction meeting with the contractor and other key construction personnel prior to clearing and grubbing to provide educational guidelines for work within the sensitive habitat areas. The QB shall discuss measures to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).</li> <li>b. During clearing and grubbing, the QB shall conduct meetings with the contractor and other key construction personnel each morning prior to construction activities in order to go over the proposed activities for the</li> </ul>	<p>All disturbance of native habitat shall be monitored by the QB during construction. The QB(s) shall be contracted with the JPA to perform biological monitoring during all clearing and grubbing activities and during bridge construction. Report to permit authorities as required by project permits including SDP.</p> <p>The JPA shall be responsible for pre-construction meeting attendance, QB meetings and monitoring and verification during construction, and final biological reporting after construction. The City MMC shall be responsible for reviewing and approving the results of the pre-construction survey.</p>	<ul style="list-style-type: none"> <li>Prior to construction (pre-construction meeting)</li> <li>Prior to construction activities (BCME/report submittal to City MMC)</li> <li>During clearing and grubbing (daily morning meetings)</li> <li>Prior to construction (review/verification of limits of construction and fencing)</li> <li>During clearing and grubbing (weekly monitoring)</li> <li>Immediately prior to brush clearing activities (flush wildlife species)</li> </ul>	

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		<p>day, and for the monitor(s) to describe the importance of restricting work to designated areas and to minimize and avoid harm to, or harassment of, wildlife prior to clearing and grubbing.</p> <p>c. Review and/or verify the limits of the construction area in the field with the contractor in accordance with the final grading plan prior to clearing and grubbing. Assume that temporary construction fencing demarcating the limits of grading are installed and properly maintained.</p> <p>d. Supervise and monitor vegetation clearing and grubbing weekly to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved and to document that protective fencing is in place and intact.</p> <p>e. Flush wildlife species (i.e., reptiles, mammals, avian, or other mobile species) from any occupied habitat areas immediately prior to brush-clearing activities. This does not include disturbance of nesting birds or “flushing” of state-listed species (i.e., Ridgeways Rail, or other listed species).</p> <p>f. Periodically monitor the construction site to verify that the project is implementing and complying with the project stormwater pollution prevention plan practices: dust control, fiber rolls and silt fencing as appropriate, removal of construction debris and a clean work area, covered trash receptacles that are animal-proof and</p>			<ul style="list-style-type: none"> <li>• During construction (periodic monitoring for stormwater compliance)</li> <li>• Within 30 days of construction completion (final BCME/report submittal to City MMC)</li> </ul>



Resource Area	Impact	Mitigation Measure	Monitoring or Reporting Action	Monitoring Responsibility	Timing
		<p>weather-proof, and prohibition of pets on the construction site.</p> <p>g. Prepare and retain monitoring notes for the duration of the proposed project for submittal in a final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resources.</p>			
	<p>Potential for impacts to sensitive habitat during construction including establishment of revegetation areas.</p>	<p><b>MM-BIO-6: Long-Term Five-Year Biological Monitoring and Reporting.</b>  Starting at the end of construction and following the 120-day plant establishment period, the long-term establishment of the mitigation revegetation areas shall be monitored by a QB/habitat restoration specialist. The QB(s) shall be contracted to perform biological monitoring throughout the five-year maintenance and monitoring period. The QB(s) shall perform the following duties:</p> <p>a. Monitor the project bi-monthly during years one and two, and quarterly during years three through five.</p> <p>b. Monitoring shall include qualitative monitoring based upon visual observations, as well as quantitative monitoring through the use of point intercept transect data collection to record percent cover of native and non-native species within the revegetation areas. Transects shall be taken in all representative mitigation/revegetation areas. The QB shall determine the location, length, and quantity of the transects to provide an adequate representation of the site conditions.</p>	<p>Implement project vegetation plan prepared by project biological consultant in accordance with the project Biological Technical Report to comply with restoration and enhancement of habitat and long-term maintenance/management.</p>	<p>The JPA shall be responsible for implementation of the long-term monitoring of revegetated areas.</p>	<ul style="list-style-type: none"> <li>At the end of the 120-day plant establishment period for five years and as specified in SDP condition.</li> </ul>

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		<p>c. Results of the monitoring effort shall be documented in annual monitoring reports to be prepared at the end of each yearly monitoring period. The reports shall describe the current site conditions, progress towards achievement of the project's success criteria and performance standards and any remedial measures that might be necessary to help ensure project success.</p> <p>d. The annual success criteria and performance standards shall be shown as in Appendix A BTR Section 7, MM-BIO-6 Tables 13–15.</p> <p>e. For all revegetation areas there shall be no invasive plant species present, as described/listed on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region, throughout the five-year maintenance and monitoring period.</p>			
	<p>Indirect impacts could occur because of grading for the trail and installation of the bridge abutments.</p>	<p><b>MM-BIO-7: Best Management Practices (BMPs).</b> To avoid indirect impacts, the project shall be required to meet National Pollutant Discharge Elimination System regulations, incorporate appropriate BMPs during project construction, install permanent BMPs per the City's Storm Water Standards Manual, and prepare and implement a Stormwater Pollution Prevention Plan. BMPs will include but are not limited to the placement of silt fencing and fiber rolls along the edges of all graded areas. The outer limits of the grading/disturbance areas shall be demarcated with orange construction fencing. Any grading that will occur</p>	<p>All disturbance of native habitat shall be monitored by a QB during construction. The QB(s) shall be contracted with the JPA to perform biological monitoring during all clearing and grubbing activities and during bridge construction.</p>	<p>The JPA shall be responsible for implementation of contracting with QBs to perform biological monitoring. The City shall be responsible for monitoring BMP compliance.</p>	<p>During construction (temporary and permanent BMP installation)</p>

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		immediately adjacent to or within standing/flowing water shall be stabilized and confined to prevent soil migration through protective measures specified in the engineering construction documents.			
	Temporary impacts to sensitive biological resources may occur during clearing and grubbing activities.	<b>MM-BIO-8: Construction Flagging and Environmental Training.</b> All required construction protection measures shall be followed, which includes having a QB present during construction activities to provide environmental training, supervise flagging of sensitive resources prior to construction as needed, and monitor the project during construction as needed to ensure no unauthorized impacts occur.	All disturbance of native habitat shall be monitored by a QB during construction. The QB(s) shall be contracted with the JPA to perform biological monitoring during all clearing and grubbing activities and during bridge construction.	The JPA shall be responsible for contracting with QBs to perform biological monitoring. The City MMC shall be responsible for ensuring compliance.	<ul style="list-style-type: none"> <li>• Prior to issuance of a NTP for any construction permits</li> <li>•</li> </ul>
	Impacts to sensitive bird species (least Bell's vireo, northern harrier, least bittern, Cooper's hawk, Canada goose, Swainson's hawk, white-tailed kit, California horned lark and yellow warbler) within 300 feet of the project site could occur from noise from construction activities during the nesting and breeding season.	<b>MM-BIO-9: Nesting Bird Surveys.</b> To avoid any indirect impacts to the above listed species, construction within 300 feet of suitable habitat, shall occur outside of the breeding season for these species (February 1 to September 15).  If construction within 300-feet of suitable nesting habitat must occur during the breeding season, a QB shall conduct a pre-construction survey within suitable habitat to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within 72 hours (i.e., three days) days prior to the start of construction activities. If nesting sensitive birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) shall be prepared and include	Construction within 300 feet of suitable habitat for sensitive birds during the breeding season (February 1 to September 15) shall be monitored by a QB. The QB(s) shall be contracted with the JPA to perform biological monitoring during all clearing and grubbing activities and during bridge construction.	The JPA shall be responsible for identifying if a pre-construction survey is necessary and preparing a letter report or mitigation plan. The City MMC shall be responsible for reviewing and approving the pre-construction survey.	<ul style="list-style-type: none"> <li>• Prior to issuance of a NTP for any construction permits</li> <li>•</li> </ul>
	Sensitive birds are: Ridgway's				

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	<p>rail, least Bell's vireo, northern harrier, least bittern, Cooper's hawk, Canada goose, Swainson's hawk, white-tailed kit, California horned lark and yellow warbler</p>	<p>proposed measures to be implemented to ensure that the disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The QB, in concert with the City, shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.</p> <p>If nesting by the above listed sensitive birds is detected, then an appropriate impact avoidance area shall be included in the mitigation plan and an appropriate buffer determined by the project biological monitor shall be established around the active nest using orange fencing or other clear demarcation method. The radius of this avoidance buffer shall be determined through coordination with the QB and authorized by the City's project manager and DSD and shall use orange fencing or other clear demarcation method to define the approved buffer. If none of these sensitive birds are observed nesting during the pre-construction survey then no further mitigation is required.</p>			
	<p>Construction within the river, up to the top of the riverbank may have adverse indirect impacts on least Ridgeway's rail, if present and if construction</p>	<p><b>MM-BIO-10: Ridgeway's Rail Protective Measures.</b> The following protective measures will be implemented to avoid impacts to Ridgeway's rail, which are a year-round resident of this portion of the San Diego River. It is assumed that Ridgeway's rail are present in the area and that the river vegetation is occupied habitat, so protective measures are</p>	<p>Prior to the preconstruction meeting, the City's MMC shall verify that the requirements regarding Ridgeway's rail are shown on the BCME/report and construction plans. Construction within the river, up to the top of the riverbank, during the</p>	<p>The JPA shall be responsible for identifying if construction would occur during the Ridgeway's rail breeding season, contracting with a QB to determine presence, and flush out of the work area if necessary.</p>	<p>Prior to issuance of a NTP for any construction permits</p>

Resource Area	Impact	Mitigation Measure	Monitoring or Reporting Action	Monitoring Responsibility	Timing
	occurs during the breeding season for this species (February 1 through September 15).	<p>necessary for any work within the river habitat, up to the top of the riverbank.</p> <p>No construction and/or vegetation removal within the river, up to the top of the riverbank, shall occur during the Ridgeway's rail breeding season (Feb. 1 - Sept. 15).</p> <p>All construction work and/or vegetation removal planned within the river habitat, up to the top of the riverbank, outside of the breeding season (i.e., Sept 15 -Feb 1), requires that the following measures be implemented to protect Ridgeway's rail.</p> <ol style="list-style-type: none"> <li>1. Prior to the start of any construction work within the river and up to the top of the riverbank, the QB shall conduct a contractor education tailgate meeting to educate the construction crew to the importance of protecting Ridgeway's rails, and on how to identify the species. The biologist will instruct the construction crew to contact the biologist immediately if any bird resembling Ridgeway's rail are identified within or adjacent to the work area, to determine whether additional measures are necessary to protect the species.</li> <li>2. A CDFW qualified Biologist shall survey all work areas within the river habitat prior to the start of work, to ensure that no Ridgeway's rails are present within the work area. The surveys shall be conducted within the work area and within a 100-foot buffer zone surrounding the work area. The surveys shall begin at or just before sunrise, approximately one hour prior to the start of work. During the</li> </ol>	breeding season (February 1 through September 15) shall be monitored by a QB during construction. The QB(s) shall be contracted with the JPA to perform biological monitoring during all clearing and grubbing activities and during bridge construction.	The City MMC shall be responsible for reviewing and approving the results of the pre-construction survey.	

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		<p>surveys the biologist shall evaluate Ridgway's rails presence within or adjacent to the work area. If no Ridgway's rails are detected by the biologist within the work area, then vegetation removal can proceed. If Ridgway's rail are detected within the work area, the biologist shall direct construction personnel to stop work within the river and work elsewhere in an area away from Ridgway's rail, until the biologist can flush the birds out of the work area. Once the birds are flushed from the work area the construction work can resume. Once the vegetation removal and disturbance is complete the surveys will no longer be necessary. The biologist shall record the number and locations of any Ridgway's rails detected, either through direct observation or through calls, within the work area or within the 100-foot buffer zone during these surveys. The biologist shall prepare a site observation report documenting each site monitoring visit. A final report including a map showing the work area and any Ridgway's Rail observations/ detection points, shall be prepared once all construction work within the river habitat is complete. The report shall document the monitoring efforts and completion of the work. The reports shall be provided to the appropriate resource agencies.</p>			

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<b>TRIBAL CULTURAL RESOURCES</b>	Construction may cause unanticipated impacts to cultural resources.	<b>MM-CUL-1</b> A qualified Native American monitor shall attend the pre-construction meeting with the JPA project manager and construction contractor and be present to monitor initial ground disturbance for the project. Once they have determined that grading and other disturbances have removed soils with a reasonable potential for containing cultural material, monitoring can be reduced to as needed and when and if additional ground-disturbing activities continue in native soil. If tribal cultural material is encountered, the Native American monitor shall have the authority to temporarily halt or redirect ground-disturbing activity while the cultural material is documented and assessed. If a cultural resource is determined to be significant, the monitor shall coordinate to develop and implement appropriate treatment measures. Artifacts collected (if any) shall be cataloged, analyzed, and curated with accompanying catalog to current professional repository standards and transferred to an appropriate curating facility within San Diego County or returned to the consulting tribe for reburial or for curation at a tribal facility.	<ul style="list-style-type: none"> <li>Confirm construction schedule at pre-construction meeting.</li> <li>Monitor construction activities to ensure compliance and communicate activities and schedule with monitors.</li> <li>Communicate and obtain concurrence from identified tribal representatives.</li> </ul>	The JPA shall be responsible for pre-construction meeting attendance, inviting a Native American monitor to the pre-construction meeting and being present for monitoring during initial ground disturbance. The City MMC shall be responsible for ensuring compliance.	<ul style="list-style-type: none"> <li>Prior to issuance of a NTP for any construction permits During construction</li> </ul>