

Table 7-1. Compliance Monitoring Actions¹

Compliance Monitoring Action	Responsible Entity	Purpose	Method/Procedures
<p>CMA1. Document the acreage of each natural community land cover type and modeled covered species habitat permanently impacted (i.e., removed) by each covered activity</p>	<p>Project proponent and the Permittee</p>	<ul style="list-style-type: none"> • Account for the acreage of natural community land cover types removed relative to the acreage authorized under the BRCP section 10 and NCCPA permits. • Document the acreage of natural community land cover type acreage remaining for subsequent removal under BRCP section 10 and NCCPA permits. • Determine habitat mitigation (protection and restoration) requirements and fees. • Document the portion of project site lands dedicated as BRCP conservation lands. • Ensure compliance with stay-ahead requirements. 	<p>Assessment of overlay of final project construction drawings with project site land cover type and covered species habitat maps. Documented in project application package to BCAG.</p>
<p>CMA2. Delineate CWA section 404 jurisdictional wetlands and waters of the US within the project site</p>	<p>Project proponent²</p>	<p>Document project site baseline conditions.</p>	<p>USACE section 404 wetland delineation protocol and California Rapid Assessment Method (CRAM) as appropriate for specific aquatic or wetland type. Survey reports submitted to Permittee and USACE.</p>
<p>CMA3. Delineate CWA section 404 jurisdictional wetlands and waters of the US on all BRCP conservation lands acquired in fee title and lands acquired through conservation easements to be credited as protecting emergent wetland, riparian vegetation, vernal pools and other seasonal wetlands, and other waters of the U.S.</p>	<p>BCAG</p>	<p>Document project site baseline conditions.</p>	<p>USACE section 404 wetland delineation protocol and CRAM as appropriate for specific aquatic or wetland type. Survey reports submitted to USACE.</p>

Table 7-1. Compliance Monitoring Actions (continued)

Compliance Monitoring Action	Responsible Entity	Purpose	Method/Procedures
<p>CMA4. Document the acreage of section 404 jurisdictional wetlands and waters of the US impacted by the proposed project or BRCP conservation action</p>	<p>Project proponent BCAG</p>	<ul style="list-style-type: none"> • Account for the acreage of jurisdictional wetland types and waters of the US impacted relative to the acreage authorized under the BRCP USACE Programmatic General Permit. • Document the acreage of jurisdictional wetland types and waters of the US remaining for subsequent removal under the BRCP USACE Programmatic General Permit. • Determine habitat mitigation (protection and restoration) requirements and fees. • Document the portion of project site lands dedicated as BRCP CWA section 404 mitigation. 	<p>Assessment of overlay of final project construction/conservation action drawings with project site wetland delineation map. Assessment of impacts submitted to Permittee (Project proponent only) and USACE.</p>
<p>CMA5. Conduct planning surveys (AMM1)</p>	<p>Project proponent</p>	<ul style="list-style-type: none"> • To collect information necessary to design proposed projects in conformance with BRCP permit requirements, including identification of resources for which impacts must be avoided through project design (e.g., covered plant occurrences for which no take is authorized under NCCPA and section 10 permits). • To minimize impacts on natural communities and covered species (e.g., adjusting planned project footprints to avoid impacts on resources.) • To prepare the project proponent’s AMM plan (Section 8.7.1.2). • To identify the potential need for species-specific preconstruction surveys. • To assess impacts on elderberry shrubs. • To assess mitigation fees. 	<p>Variable depending on resources present (see AMM1). Survey results reported to the Permittee.</p>

Table 7-1. Compliance Monitoring Actions (continued)

Compliance Monitoring Action	Responsible Entity	Purpose	Method/Procedures
CMA6. Conduct preconstruction surveys (AMM2)	Project proponent	To ensure impacts on the covered species identified in Table 6-2 are avoided during the period during the period they are present on the project site (see AMM2).	Variable depending on the resources present (see Table 6-2). Survey results reported to the Permittee.
CMA7. Document the injury or killing of a covered species during implementation of covered activities	Project proponent	Comply with BRCP section 10 and NCCPA permit requirements.	Direct observation during implementation of a covered activity. Reported to USFWS, CDFW, and NMFS (as applicable to their jurisdictions), the Permittee, and BCAG.
CMA8. Document authorized levels of covered species take in accordance with the levels specified in Table 6-3	Project proponent and the Permittee	Track compliance with take limits specified in Table 6-3	Direct observation during implementation of a covered activity.
CMA9. Document implementation of avoidance and minimization measures (AMMs)	Project proponent and the Permittee	Document compliance with applicable BRCP AMM implementation requirements and with BRCP section 10 and NCCPA permits.	Documented in the Project proponent AMM plan and planning survey and pre-construction survey reports submitted to the Permittee.
CMA10. Document implementation of habitat protection, enhancement, restoration, and management actions	BCAG	Document implementation of the BRCP in conformance with BRCP permits.	Description of habitat acquired for conservation and mitigation and habitat restoration activities in annual reports to USFWS, CDFW, NMFS, and USACE (Section 8.2.2).
CMA11. Document results of effectiveness monitoring (Section 5.8.3 and Tables 7-2 to 7-4)	BCAG	Document implementation of the BRCP in conformance with BRCP permits (see Section 5.8.3 and Tables 7-2 to 7-4 for a description of additional purposes of effectiveness monitoring).	Description of effectiveness monitoring actions and results in annual reports submitted by the BCAG to USFWS, CDFW, NMFS, and USACE (Section 8.2.2).
CMA12. Document changes in implementation through the BRCP adaptive management decision making process (Section 7.3)	BCAG	Document implementation of the BRCP in conformance with BRCP permits.	Description of adaptive management actions in annual reports submitted by the BCAG to USFWS, CDFW, NMFS, and USACE (Section 8.2.2).
CMA13. Document remedial measures implemented in response to change circumstances (Section 6.4.2)	BCAG	Document implementation of the BRCP in conformance with BRCP permits.	Description of remedial measures implemented in annual reports submitted by the BCAG to USFWS, CDFW, NMFS, and USACE (Section 8.2.2).

¹ Avoidance and measures referenced in this table are described in Chapter 6, Conditions on Covered Activities.

²BCAG may conduct this monitoring action at the request of the project proponent for a fee.

