

Comment Set B0018, cont.
The Nevada Hydro Company Inc

**REVISED "ADDITIONAL MITIGATION MEASURES"
LEAPS TRANSMISSION-ONLY ALTERNATIVE
(Continued)**

Number	Mitigation Measure
C-2a (Cont.)	<p>If human remains are discovered during construction, all work shall be diverted from the area of the discovery and the Lead Agencies' authorized officer shall be informed immediately. The Applicant shall follow all State and federal laws, statutes, and regulations that govern the treatment of human remains. The Applicant shall assist and support the Lead Agencies in all required government-to-government consultations with Native Americans and appropriate agencies and commissions, as requested by the Lead Agencies. The Applicant shall comply with and implement all required actions and studies that result from such consultations, as directed by the Lead Agencies.</p> <p>Although subject to the recommendations of the MLD, it is likely that the human remains would be respectfully removed by the MLD and/or qualified archaeologists and reinterred in an area not subject to impacts from the project. The re-interment location may be identified as a nearby locale within the Applicant's ROW, or an off-site location may be selected. The Applicant shall assist and support the MLD in identifying, acquiring, and protecting the re-interment location.</p>
C-3a	<p>Monitor construction in areas of high sensitivity for buried resources. The Applicant shall implement archaeological monitoring by a professional archaeologist during subsurface construction disturbance at all locations identified in the Historic Properties Treatment Plan (HPTP) as highly sensitive for buried prehistoric or historical archaeological sites or Native American human remains. These locations and their protection boundaries shall be defined and mapped in the HPTP. Intermittent monitoring may occur in areas of moderate archaeological sensitivity at the discretion of the Lead Agencies. Monitoring shall be conducted in accordance with procedures detailed in Mitigation Measure C-1e</p> <p>Upon discovery of potential buried cultural materials by archaeologists or construction personnel, or damage to an ESA, work in the immediate area of the find shall be diverted and the Applicant's archaeologist notified. Once the find has been inspected and a preliminary assessment made, the Applicant's archaeologist will consult with the Lead Agencies, as appropriate, to make the necessary plans for evaluation and treatment of the find(s) or mitigation of adverse effects to ESAs, in accordance with the Secretary's Standards, and as specified in the HPTP.</p>
C-4a	<p>Complete consultation with Native American and other Traditional Groups. The Applicant shall provide assistance to the Lead Agencies, as requested by the Lead Agencies, to complete required government-to-government consultation with interested Native American tribes and individuals (Executive Memorandum of April 29, 1994 and Section 106 of the National Historic Preservation Act) and other Traditional Groups to assess the impact of the approved project on Traditional Cultural Properties or other resources of Native American concern, such as sacred sites and landscapes, or areas of traditional plant gathering for food, medicine, basket weaving, or ceremonial uses. As directed by the Lead Agencies, the Applicant shall undertake required treatments, studies, or other actions that result from such consultation. Written documentation of the completion of all pre-construction actions shall be submitted by the Applicant and approved by the Lead Agencies at least 30 days before commencement of construction activities. Actions that are required during or after construction shall be defined, detailed, and scheduled in the Historic Properties Treatment Plan and implemented by the Applicant, consistent with Mitigation Measure C-1c (Develop and implement Historic Properties Treatment Plan).</p>
C-5a	<p>Protect and monitor NRHP and/or CRHR-eligible properties. The Applicant shall design and implement a long-term plan to protect National Register of Historic Places (NRHP- and/or CRHR)-eligible sites from direct impacts of project operation and maintenance and from indirect impacts (such as erosion and access) that could result from the presence of the project. The plan shall be developed in consultation with the Lead Agencies to design measures that will be effective against project maintenance impacts, such as vegetation clearing and road and tower maintenance, and project-related vehicular impacts. The plan shall also include protective measures for NRHP- and/or CRHR-eligible properties within the transmission line corridor that will experience operational and access impacts as a result of the project. Measures considered shall include restrictive fencing or gates, permanent access road closures, signage, stabilization of potential erosive areas, site capping, site patrols, and interpretive/educational programs, or other measures that will be effective for protecting NRHP- and/or CRHR-eligible properties. The plan shall be property specific and shall include provisions for monitoring and reporting its effectiveness and for addressing inadequacies or failures that result in damage to NRHP- and/or CRHR-eligible properties.</p> <p>The plan shall be submitted to the Lead Agencies and other appropriate land-managing agencies for review and approval at least 30 days prior to project operation.</p> <p>Monitoring of sites selected during consultation with the Lead Agencies shall be conducted annually by a professional archaeologist for a period of five years. Monitoring shall include inspection of all site loci and defined surface features, documented by photographs from fixed photo monitoring stations and written observations. A monitoring report shall be submitted to the Lead Agencies and other appropriate land-managing agencies within one month following the annual resource monitoring. The report shall indicate any properties that have been affected by erosion or vehicle or maintenance impacts. For properties that have been impacted, the Applicant shall provide recommendations for mitigating impacts and for improving protective measures.</p>

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REVISED "ADDITIONAL MITIGATION MEASURES"
 LEAPS TRANSMISSION-ONLY ALTERNATIVE
 (Continued)

Number	Mitigation Measure
C-5a (Cont.)	<p>After the fifth year of resource monitoring, the Lead Agencies or other land-managing agency, as appropriate, will evaluate the effectiveness of the protective measures and the monitoring program. Based on that evaluation, the Lead Agencies may require that the Applicant revise or refine the protective measures, or alter the monitoring protocol or schedule. If the Lead Agencies do not authorize alteration of the monitoring protocol or schedule, those shall remain in effect for the duration of project operation.</p> <p>If the annual monitoring program identifies adverse effects to National Register of Historic Places (NRHP- and/or CRHR)-eligible properties from operation or long-term presence of the project, or if, at any time, the Applicant, the Lead Agencies, or other appropriate land-managing agency become aware of such adverse effects, the Applicant shall notify the Lead Agencies immediately and implement additional protective measures, as directed by the Lead Agencies. At the discretion of the Lead Agencies, such measures may include, but not be limited to, refinement of monitoring protocols, data-recovery investigations, or payment of compensatory damages in the form of non-destructive cultural resources studies or protection.</p>
C-6a	<p>Reduce adverse visual intrusions to historic built environment properties. All known historic built environment resources located within 0.5 miles of the project shall be inventoried and subjected to a visual analysis to assess which resources would be subject to potential indirect visual intrusions resulting from the project. This inventory will supplement the analysis of built environment resources conducted for the [Sunrise] EIS/EIR, and shall meet the requirements of Section 106 to inventory historic properties that could be adversely affected by the project. The Applicant shall inventory potentially register-eligible built environment resources within an Area of Potential Indirect Effect established by the Lead Agencies. A qualified (Secretary of the Interior Standards) Architectural Historian shall assess the potential for visual intrusions on the qualities that qualify any historic properties within the APE for register eligibility. The results of this inventory shall be included in the HPTP. If any historic properties are identified that would be adversely affected by visual intrusions from the project, the HPTP shall also specify mitigation measures that would be implemented to reduce adverse effects, such as screening the visual intrusion with vegetation, moving project towers to less conspicuous locations, or altering towers to reduce any identified adverse effects.</p>
<p>Notes:</p> <ol style="list-style-type: none"> The mitigation measures included herein are based on those mitigation measures identified by the CPUC and BLM and presented in Section E.7.1 (LEAPS Transmission-Only Alternative) as presented in the Sunrise DEIR/DEIS. The "LEAPS Transmission-Only Alternative," as presented therein, is assumed to be the same project as The Nevada Hydro Company's (TNHC) "Talega-Escondido/Valley-Serrano 500-kV Transmission Project." In presenting this inventory of draft mitigation measures, TNHC has sought to accurately interpret the applicable measures identified by the CPUC and BLM and the alternative-specific modifications described in the Sunrise DEIR/DEIS. In addition, TNHC has made the following general modifications: (1) "SDG&E," "project proponent," and "proponent" have been changed to "Applicant" (as used herein, the term "Applicant" is assumed to refer to TNHC); (2) "Proposed Project" has been changed to "project"; (3) "State Park" (B-5a[LE]) has been changed to "USDA Forest Service"; (4) "ABDSP" has been changed to "CNF"; (5) reference to "SDG&E's NCCP mitigation credits" (B-1d) has been deleted; (6) references to "CPUC" and "BLM" have been changes to "Lead Agencies" and references to "State Parks," "USDA Forest Service," and "Wildlife Agencies" have been changed to "other agencies with jurisdiction over the project"; (7) the term "Applicant Proposed Measures (APMs)" is assumed to be synonymous with and inclusive of the "Protection, Mitigation, and Enhancement Measures (PMEs)" presented in the Applicant's PEA; (8) reference to any specific mitigation obligations concerning the "Proposed Project," when such reference is with regards to the Sunrise Powerlink Project, has been deleted; (9) for the purpose of consistency, reference to "USFS" and certain references to the "CNF" have been changed to "USDA Forest Service"; and (10) for the purpose of consistency, reference to specific project facilities has been changed to better correspond with the Applicant's PEA. If these changes are not consistent with the intent of and/or are not acceptable to the CPUC and BLM, TNHC requests the opportunity to discuss the identified changes prior to any formal action with regards thereto. TNHC does not presently support the inclusion of this measure, the precise language of this measure, or some portion thereof and requests the deletion of or, in consultation with the CPUC and BLM, the opportunity to formulate an alternative measure(s). In certain instances, TNHC's concerns relate only to a few words in each measure and not an opposition to its general intent. 	

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Source: The Nevada Hydro Company, Inc.

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Attachment B
Revised “Additional Mitigation Measures”
LEAPS Generation and Transmission Alternative
The Nevada Hydro Company, Inc.

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 The Nevada Hydro Company Inc

REVISED "ADDITIONAL MITIGATION MEASURES"
 LEAPS GENERATION AND TRANSMISSION ALTERNATIVE¹

Number	Mitigation Measure
B-1a(LE)	<p>Provide restoration/compensation for affected sensitive vegetation communities. Surface-disturbing components of the project shall be located in previously disturbed areas or where habitat quality is poor to the extent possible, and disturbance of vegetation and soils shall be minimized. If avoidance of sensitive vegetation communities is not feasible due, for example, to physical or safety constraints, the Applicant shall restore temporarily impacted areas to pre-construction conditions following construction (or emergency repairs) and shall permanently block off all public access to them, and/or shall purchase/dedicate suitable habitat for preservation to off-set permanently impacted areas. Restoration of some vegetation communities in temporarily impacted areas may not be possible if those areas are subject to vegetation management to maintain proper clearance between transmission lines and vegetation. In those instances, the mitigation shall consist of off-site acquisition and preservation of the vegetation community instead. Restoration involves recontouring the land, replacing the topsoil (if it was collected), planting seed and/or container stock, and maintaining (i.e., weeding, replacement planting, supplemental watering, etc.) and monitoring the restored area for a period five years. Restoration in the Cleveland National Forest (CNF) shall be maintained and monitored for a minimum of five years. The success of the restoration is usually based on how the habitat compares with similar, nearby, undisturbed habitat. Any restoration efforts would be subject to a Habitat Restoration Plan approved by the Lead Agencies [defined as the CPUC from a CEQA perspective and both FERC and the USDA Forest Service from a NEPA perspective] and other agencies with jurisdiction over the project. Mitigation ratios and mitigation acreages for construction within authorized limits are provided in Table D.2-7 [in the Sunrise DEIR/DEIS]. The mitigation ratios also apply to impacts from emergency repairs <u>within non-federal lands in San Diego County.</u></p> <p><u>Non-federal lands in Riverside County will be addressed under the requirements of the Western Riverside County Multiple Species Habitat Conservation Plan (Riverside County MSHCP) and minimization efforts will be completed. Loss of habitat would be compensated for in a mitigation fee that would be used to purchase lands under the authority of the Riverside Conservation Authority (RCA) as a part of the Riverside County MSHCP requirements.</u></p> <p><u>USDA Forest Service lands and any other federal lands will require a habitat mitigation plan that meets USDA Forest Service habitat objectives and standards and provide additional enhancement measures to offset unavoidable effects that are inconsistent with the Land Management Plan. The plan at a minimum will include mitigation ratios for the permanent loss of habitat at 1:1 for habitats that are sensitive or support listed species, coastal sage scrub, and riparian oak woodlands.</u></p> <p>All limits of construction shall be delineated with orange construction fencing. During and after construction, entrances to access roads shall be gated to prevent the unauthorized use of these roads by the general public.</p> <p>Signs prohibiting unauthorized use of the access roads shall be posted on these gates.</p> <p>Any impacts associated with unauthorized activity (e.g., exceeding approved construction footprints) shall be mitigated at a 5:1 ratio (5.5:1 in FTHL MA [Flat-Tailed Horned Lizard Management Area] on non-federal lands in San Diego County. Restoration of the unauthorized impacts shall be credited at a 1:1 ratio (i.e., mitigated by in-place habitat restoration); the remaining 4:1 (or 4.5:1 in FTHL MA) shall be acquired off site on non-federal lands in San Diego County.</p> <p>Areas to be restored shall include all areas temporarily impacted by construction, such as tower construction sites, laydown/staging areas, temporary access and spur roads, and existing tower locations where towers are removed. Where on-site restoration is planned, the Applicant shall identify a qualified Habitat Restoration Specialist to be approved by the Lead Agencies and other agencies with jurisdiction over the project. The Habitat Restoration Specialist shall prepare and implement a Habitat Restoration Plan, for restoring temporarily impacted sensitive vegetation communities, to be approved by the Lead Agencies and other agencies with jurisdiction over the project. The Applicant shall work with the Lead Agencies and other agencies with jurisdiction over the project until a plan is approved by all. This Habitat Restoration Plan must be approved in writing by the above-listed agencies prior to the initiation of any vegetation disturbing activities. Hydroseeding, drill seeding, or an otherwise proven restoration technique shall be utilized on all disturbed surfaces using a locally endemic native seed mix approved by the Lead Agencies and other agencies with jurisdiction over the project. The Habitat Restoration Plan shall incorporate the measures identified in the May 25, 2006 Memorandum of Understanding among Edison Electric Institute, USDA Forest Service, BLM, USFWS, National Park Service, and the Environmental Protection Agency (Edison Electric Institute, et al., 2006) where applicable. The MOU discusses vegetation management along ROWs for electrical transmission and distribution facilities on federal lands. The major provisions of the MOU include reducing soil erosion and water quality impacts; promoting local ecotypes in revegetation projects; planting native species and protecting rare species; and reducing the introduction of non-native, invasive or noxious plant species to the ROWs. The MOU can be viewed online at http://www.eei.org/industry_issues/environment/land/vegetation_management/EEI_MOU_FINAL_5-25-06.pdf.</p> <p>The following habitat restoration requirements are not included in the MOU described above. The restoration of habitat shall be maintained and monitored for five years after installation by an experienced, licensed <u>qualified</u> Habitat Restoration Contractor, or until established success criteria identified in the Restoration Plan (specified percent cover of native and non-native species, species diversity, and species composition as compared with an undisturbed reference site) are met. Maintenance and monitoring for restoration in CNF shall be for a minimum of five years, even if established success criteria are met before the end of five years. Maintenance and monitoring shall be conducted following a prescribed schedule to assess progress and identify potential problems with the restoration.</p>

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**REVISED "ADDITIONAL MITIGATION MEASURES"
LEAPS GENERATION AND TRANSMISSION ALTERNATIVE
(Continued)**

Number	Mitigation Measure
B-1a(LE) (Cont.)	<p>Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken by an experienced, licensed <u>qualified</u> Habitat Restoration Contractor during the maintenance and monitoring period if necessary to ensure the success of the restoration. If the restoration fails to meet the established success criteria after the maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the Lead Agencies and other agencies with jurisdiction over the project. For areas where habitat restoration cannot meet mitigation requirements, off-site purchase and dedication of habitat shall be provided at the mitigation ratios provided in Table D.2-7 [in the Sunrise DEIR/DEIS] or as otherwise required by other agencies with jurisdiction over the project.</p> <p>Tree Mitigation. Mitigation for loss of native trees or native tree trimming shall be provided by (1) acquiring and preserving habitat within which the trees occur and/or (2) restoring (i.e., planting) trees on land that would not be subject to vegetation clearing (either in the Applicant's ROW and/or on land acquired and preserved). Any land to be used for this mitigation shall be approved by the Lead Agencies and other agencies with jurisdiction over the project.</p> <p>For habitat acquisition and preservation <u>on non-federal lands in San Diego County</u>, the mitigation ratios shall follow those in Table D.2-7 [in the Sunrise DEIR/DEIS]. For example, removal of coast live oak trees (that occur in coast live oak woodland) shall require mitigation at a 3:1 ratio based on the permanent impact to the summed acreage of all individual coast live oak trees impacted. Therefore, if the total acreage of all individual coast live oak trees in coast live oak woodland impacted is 10 acres, then 30 acres of coast live oak woodland shall be acquired and preserved. For all trimmed native trees, the ratio shall be 1:1. For restoration (planting trees), these guidelines, based on recommendations from the CDFG, shall be followed. [1] Native trees that are removed shall be replaced in-kind as follows. [a] Trees less than five inches diameter at breast height (DBH) shall be replaced at 3:1. [b] Trees between five and 12 inches DBH shall be replaced at 5:1. [c] Trees between 12 and 36 inches shall be replaced at 10:1. [d] Trees greater than 36 inches shall be replaced at 20:1. Native trees that are trimmed shall be replaced in-kind as follows. [a] Trees less than 12 inches DBH shall be replaced at 2:1. [b] Trees greater than 12 inches DBH shall be replaced at 5:1.</p> <p><u>Non-federal lands in Riverside County will be addressed under the requirements of the Riverside County MSHCP and minimization efforts will be completed. Loss of coast live oak trees (that occur in coast live oak woodland) shall require mitigation at a 1:1 ratio based on the permanent impact to the summed acreage of all individual coast live oak trees impacted. Therefore, if the total acreage of all individual coast live oak trees in coast live oak woodland impacted is 10 acres, then 10 acres of coast live oak woodland shall be acquired and preserved. For all trimmed native trees, the ratio shall also be 1:1. The loss of habitat would be compensated for in a mitigation fee that would be used to purchase lands under the authority of the RCA as a part of the Riverside County MSHCP requirements.</u></p> <p><u>USDA Forest Service lands and any other federal lands will require a habitat mitigation plan that meets USDA Forest Service habitat objectives and standards and provide additional enhancement measures to offset unavoidable effects that are inconsistent with the Land Management Plan. At a minimum, the plan will include mitigation ratios for the permanent loss of habitat at 1:1 for habitats that are sensitive or support listed species, coastal sage scrub, and riparian oak woodlands.</u></p> <p>All restoration shall be maintained and monitored for a minimum of 40 <u>5</u> years. The restoration shall be directed according to a Habitat Restoration Plan approved by the Lead Agencies and other agencies with jurisdiction over the project.</p> <p>Mitigation Parcels/Habitat Management Plans. All off-site mitigation parcels shall be approved by the Lead Agencies and other agencies with jurisdiction over the project and must be acquired prior to the initiation of vegetation disturbing activities. <u>Fees associated with the Riverside County MSHCP must be deposited prior to any vegetation disturbing activities, although the exact lands to be purchased or enhanced would be under the direction of the RCA.</u> A Habitat Management Plan shall be prepared by a biologist approved by the Lead Agencies and other agencies with jurisdiction over the project for all acquired off-site mitigation parcels. The Habitat Management Plan must be approved in writing by the Lead Agencies and other agencies with jurisdiction over the project prior to the initiation of any vegetation disturbing activities. The Applicant shall work with the Lead Agencies and other agencies with jurisdiction over the project until a plan is approved by all. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, off-site mitigation parcels. The Habitat Management Plan shall include, but shall not be limited to: [1] Legal descriptions of all mitigation parcels approved by the Lead Agencies and other agencies with jurisdiction over the project. [b] Baseline biological data for all mitigation parcels. [3] Designation of a land management entity approved by the Lead Agencies and other agencies with jurisdiction over the project to provide in-perpetuity management. [4] A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan. [5] Designation of responsible parties and their roles (e.g., provision of endowment by the Applicant to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity). [6] Management specifications including, but not limited to, regular biological surveys to compare with baseline; exotic, non-native species control; fence/sign replacement or repair, public education; trash removal; and annual reports to Lead Agencies and other agencies with jurisdiction over the project.</p>

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The Nevada Hydro Company Inc

REVISED "ADDITIONAL MITIGATION MEASURES"
LEAPS GENERATION AND TRANSMISSION ALTERNATIVE

(Continued)

Number	Mitigation Measure
B-1b(LE)	<p>Implement appropriate avoidance/minimization/compensation strategies for vernal pools and fairy shrimp habitat. Direct impacts to vernal pools and water-holding basins (aka road pools) shall be avoided where the absence of <u>federally listed</u> fairy shrimp has not been proven by USFWS protocol wet/dry sampling and/or where the absence of vernal pool indicator species has not been proven. Indirect impacts to vernal pool watersheds shall also be avoided. Temporary and permanent access roads shall not enter vernal pools or water holding basin areas unless absolutely necessary. Where not avoided, the following mitigation shall be implemented.</p> <p>Prior to construction, a qualified biologist (to be approved by the Lead Agencies and other agencies with jurisdiction over the project; see Mitigation Measure B-1c(LE)) shall clearly stake and flag all vernal pools and potential water-holding basins that occur in proximity to the project that are not within the impact zone. In addition to vehicles being restricted from the staked and flagged areas, crewmembers on foot shall also avoid these areas. The qualified biologist shall conduct a pre-construction training session for the construction crew to inform them of the constraints. The qualified biologist shall ensure compliance with this mitigation measure by being present during all construction activities in areas with vernal pools and water-holding basins.</p> <p>Access roads, including those used during maintenance activities, containing water-holding basins <u>with demonstrated presence of federally listed species</u> shall be used only when the water-holding basins are completely dry. If access roads must be used while any portion of the <u>above identified</u> depressions within the roads are wet, metal plating or bridging shall be placed over the depressions to prevent alteration of the depression topography and hydrology, and to prevent impacts to fairy shrimp (where the absence of fairy shrimp has not been proven). This bridging or plating shall not be left in place for more than three weeks. Any bridging or plating shall be considered a direct impact to <u>federally listed</u> fairy shrimp (where not proven absent) and shall be mitigated in accordance with this mitigation measure as follows.</p> <p>Permanent impacts to vernal pools shall be mitigated in the form of vernal pool habitat restoration at a 2:1 ratio outside the impact zone. Temporary impacts to vernal pools shall be mitigated at a 2:1 ratio in the form of 1:1 on-site habitat restoration and 4:1 vernal pool habitat restoration outside the impact zone.</p> <p>Permanent impacts to occupied <u>federally listed</u> fairy shrimp habitat shall be mitigated in the form of vernal pool habitat restoration at a 2:1 ratio outside the impact zone. Temporary impacts to occupied fairy shrimp habitat shall be mitigated at a 2:1 ratio in the form of 1:1 on-site habitat restoration and 4:1 vernal pool habitat restoration outside the impact zone.</p> <p>Unauthorized impacts to vernal pools or occupied fairy shrimp habitat shall be mitigated at a 5:1 ratio. Restoration of the unauthorized impacts shall be credited at a 1:1 ratio; the remaining 4:1 shall be mitigated in the form of vernal pool restoration outside the impact zone.</p> <p>The location selected for vernal pool restoration shall be located in the project region, be appropriate for vernal pool restoration, and be acceptable to the Lead Agencies and other agencies with jurisdiction over the project. The Applicant shall identify a qualified Habitat Restoration Specialist to be approved by the Lead Agencies and other agencies with jurisdiction over the project. The Habitat Restoration Specialist shall prepare and implement a Mitigation Plan to be approved in writing by the Lead Agencies and other agencies with jurisdiction over the project. This Mitigation Plan, including the specific location and methods of the restoration efforts (e.g., removal of non-native plant species, use of salvaged vernal pool soils), must be approved in writing prior to the initiation of any activities which will impact (directly or indirectly) vernal pools or water-holding basins. The Applicant shall work with the Lead Agencies and other agencies with jurisdiction over the project until a plan is approved by all.</p> <p>The restoration of vernal pool habitat shall include the salvage of vernal pool/water-holding basin soils that would be impacted and that likely contain <u>federally listed</u> fairy shrimp cysts. The soils shall be used in the restoration of vernal pool habitat. The restored vernal pool habitat shall be maintained and monitored for five years after installation, or until established success criteria identified in the Mitigation Plan (e.g., specified percent cover of native and non-native species, species diversity, and species composition as compared with undisturbed reference pools) are met. If the mitigation fails to meet the established success criteria after the five-year maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the Lead Agencies and other agencies with jurisdiction over the project.</p> <p>A Habitat Management Plan shall be prepared by a biologist approved by the Lead Agencies and other agencies with jurisdiction over the project for all vernal pool habitat restoration areas. The Habitat Management Plan must be approved in writing by the Lead Agencies and other agencies with jurisdiction over the project prior to the initiation of any activities which may impact (directly or indirectly) vernal pools or water-holding basins. The Applicant shall work with the Lead Agencies and other agencies with jurisdiction over the project until a plan is approved by all. The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all vernal pool habitat restoration areas.</p>

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**REVISED “ADDITIONAL MITIGATION MEASURES”
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(Continued)**

Number	Mitigation Measure
B-1b(LE) (Cont.)	<p>The Habitat Management Plan shall include, but shall not be limited to: [1] Legal descriptions of all restoration areas approved by the Lead Agencies and other agencies with jurisdiction over the project. [2] Baseline biological data for all restoration areas. [3] Designation of a land management entity approved by the Lead Agencies and other agencies with jurisdiction over the project to provide in-perpetuity management. [4] A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan. [5] Designation of responsible parties and their roles (e.g., provision of endowment by the Applicant to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity). [6] Management specifications including, but not limited to, regular biological surveys to compare with baseline exotic, non-native species control; fence/sign replacement or repair, public education; trash removal; and annual reports to the Lead Agencies and other agencies with jurisdiction over the project.</p>
B-1c(LE)	<p>Conduct biological monitoring. Monitoring shall be provided by a qualified biologist approved by the Lead Agencies and other agencies with jurisdiction over the project to ensure that all impacts occur within designated limits. Monitoring entails communicating with contractors, taking daily notes, and ensuring that the requirements of the APMs [Applicant Proposed Measures] and mitigation measures are being met by being present during construction activities. The qualified biologist shall conduct monitoring for any area subject to disturbance from construction activities (or access roads used during maintenance activities in the case of vernal pools/water-holding basins; see Mitigation Measure B-1b(LE)). The Applicant, its contractors and subcontractors, and their respective project personnel, shall refer all environmental issues, including wildlife relocation, sick or dead wildlife, hazardous waste, or questions about environmental impacts to the qualified biologist. Experts in wildlife handling (e.g., Project Wildlife) may need to be brought in by the qualified biologist for assistance with wildlife relocations.</p> <p>The qualified biologist shall have the authority to issue stop work orders if any part of the mitigation measures or APMs are being violated. The qualified biologist shall immediately notify the Lead Agencies and other agencies with jurisdiction over the project of any significant events discovered during the monitoring. Reinitiation of work following a stop work order shall only occur when the Lead Agencies and other agencies with jurisdiction over the project are satisfied that the impacts have been fully documented, that compensation for these impacts shall be made, and that any additional protection measures they deem necessary shall be undertaken.</p>
B-2a(LE)	<p>Provide restoration/compensation for affected jurisdictional areas. Impacts to areas under the jurisdiction of the ACOE, RWQCB, and CDFG shall be avoided to the extent feasible. Where avoidance of jurisdictional areas is not feasible (including for emergency repairs), the Applicant shall provide the necessary mitigation required as part of wetland permitting by creation/restoration/preservation of suitable jurisdictional habitat along with adequate buffers to protect the function and values of jurisdictional area mitigation. The location(s) of the mitigation would be determined in consultation with the Lead Agencies and other agencies with jurisdiction over the project as part of the wetland permitting process. It is anticipated that the sites would be in close proximity to the impacts or in the same watershed. A jurisdictional delineation and impact assessment shall be prepared based on the final alignment and final engineering plans when they are complete. Mitigation ratios would range from 1:1 up to 4:1 and would depend on the sensitivity of the jurisdictional habitat and on the requirements of the wetland permitting agencies. The width of wetland buffers would also depend on the sensitivity of the jurisdictional habitat and on the requirements of the wetland permitting agencies. Recommended mitigation ratios for vegetation communities that generally occur in jurisdictional areas are provided in Table D-2-7 in the Sunrise DEIR/DEIS. It is anticipated that at least a 1:1 ratio of the mitigation would include creation of jurisdictional habitat so there would be no net loss of jurisdictional habitat.</p> <p>For example, permanent impacts to emergent wetland would require a 2:1 mitigation ratio. Half (or 1:1) of the mitigation acreage would have to consist of created emergent wetland in an appropriate location to be preserved, and the other half (1:1) would require acquisition and preservation of already existing emergent wetland (or other wetland community acceptable to the permitting agencies – ACOE, RWQCB, and other agencies with jurisdiction over the project). It is also anticipated that a 1:1 ratio would be required for impacts to jurisdictional non-wetland Waters of the U.S. in the form of wetland enhancement, restoration, or creation as determined in consultation with the permitting agencies. Wetland permits shall be obtained from the ACOE, RWQCB, and CDFG prior to initiating construction in jurisdictional areas.</p> <p>All limits of construction shall be delineated with orange construction fencing. All stakes, flagging, or fencing shall be removed no later than 30 days after construction is complete. During and after construction, entrances to access roads shall be gated to prevent the unauthorized use of these roads by the general public. Signs prohibiting unauthorized use of the access roads shall be posted on these gates.</p> <p>Any impacts associated with unauthorized activity (e.g., exceeding approved construction footprints) shall be mitigated as follows, unless otherwise directed by the ACOE, RWQCB, and CDFG: restoration of the unauthorized impacts shall be credited at a 1:1 ratio; the remaining 4:1 (or 4.5:1 in FTHL-MA) shall be acquired off site.</p>

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Comment Set B0018, cont.
The Nevada Hydro Company Inc

REVISED "ADDITIONAL MITIGATION MEASURES"
LEAPS GENERATION AND TRANSMISSION ALTERNATIVE
(Continued)

Number	Mitigation Measure
B-2a(LE) (Cont.)	<p>The Applicant shall identify a qualified Habitat Restoration Specialist to be approved by the Lead Agencies and other agencies with jurisdiction over the project. The Habitat Restoration Specialist shall prepare and implement a Wetland Mitigation Plan to be approved in writing by the Lead Agencies and other agencies with jurisdiction over the project. The Applicant shall work with the above-listed agencies until a plan is approved by all. The mitigation of habitat shall be maintained and monitored for five years after installation, or until established success criteria (specified percent cover of native and non-native species, species diversity, and species composition as compared with an undisturbed reference site) are met, to assess progress and identify potential problems with the mitigation. Remedial action (e.g., additional planting, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken during the maintenance and monitoring period if necessary to ensure the success of the mitigation. If the mitigation fails to meet the established performance criteria after the five-year maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the Lead Agencies and other agencies with jurisdiction over the project.</p> <p>A Habitat Management Plan shall be prepared by a biologist approved by the Lead Agencies and other agencies with jurisdiction over the project for all acquired off-site mitigation parcels. The Habitat Management Plan must be approved in writing by the Lead Agencies and other agencies with jurisdiction over the project prior to the initiation of any activities which may impact jurisdictional areas. The Applicant shall work with the Lead Agencies and other agencies with jurisdiction over the project until a plan is approved by all.</p> <p>The Habitat Management Plan shall provide direction for the preservation and in-perpetuity management of all acquired, off-site mitigation parcels. The Habitat Management Plan shall include, but shall not be limited to: [1] Legal descriptions of all mitigation parcels approved by the Lead Agencies and other agencies with jurisdiction over the project. [2] Baseline biological data for all mitigation parcels. [3] Designation of a land management entity approved by the Lead Agencies and other agencies with jurisdiction over the project to provide in-perpetuity management. [4] A Property Analysis Record prepared by the designated land management entity that explains the amount of funding required to implement the Habitat Management Plan. [5] Designation of responsible parties and their roles (e.g., provision of endowment by the Applicant to fund the Habitat Management Plan and implementation of the Habitat Management Plan by the designated land management entity). [6] Management specifications including, but not limited to, regular biological surveys to compare with baseline; exotic, non-native species control; fence/sign replacement or repair, public education; trash removal; and annual reports to Lead Agencies and other agencies with jurisdiction over the project.</p>
B-3a(LE)	<p>Prepare and Implement a Weed Control Plan. The Applicant shall prepare and implement a comprehensive, adaptive Weed Control Plan for pre-construction and long-term invasive weed abatement. Where the Applicant owns the ROW property, the Weed Control Plan shall include specific weed abatement methods, practices and treatment timing developed in consultation with the <u>Riverside County Agricultural Commissioner's Office</u>, San Diego County Agriculture Commissioner's Office and California Invasive Plant Council (Cal-IPC). On the ROW easement lands administered by public agencies (Lead Agencies, USDA Forest Service and other agencies with jurisdiction over the project), the Weed Control Plan shall incorporate all appropriate and legal agency-stipulated regulations. The Weed Control Plan shall be submitted to the ROW land-holding public agencies for final authorization of weed control methods, practices, and timing prior to implementation of the Weed Control Plan on public lands. ROW easements located on private lands shall include adaptive provisions for the implementation of the Weed Control Plan. Prior to implementation, the Applicant shall work with the landowners to obtain authorization of the weed control treatment that is required.</p> <p>The Weed Control Plan shall include the following: [1] A pre-construction weed inventory shall be conducted by surveying the entire ROW and areas immediately adjacent to the ROW as well as at all ancillary facilities associated with the project for weed populations that: (1) are considered by the <u>Riverside County Agriculture Commissioner and/or San Diego County Agriculture Commissioner</u> as being a priority for control and (2) aid and promote the spread of wildfires (such as cheatgrass [<i>Bromus tectorum</i>], Saharan mustard [<i>Brassica tournefortii</i>] and medusa head [<i>Taeniatherum caput-medusae</i>]). These populations shall be mapped and described according to density and area covered. These plant species shall be treated prior to construction according to control methods and practices for invasive weed populations designed in consultation with the <u>Riverside County Agriculture Commissioner and San Diego County Agriculture Commissioner's Office</u>. [2] A pre-construction weed inventory shall also be conducted by surveying areas that will be directly impacted by the project for weed populations that are rated High or Moderate for negative ecological impact in the California Invasive Plant Inventory Database (Cal-IPC, 2006). These plant species shall be treated prior to construction according to control methods and practices for invasive weed populations designed in consultation with Cal-IPC. [3] Weed control treatments shall include all legally permitted chemical, manual and mechanical methods applied with the authorization of the <u>Riverside County Agriculture Commissioner and/or San Diego County Agriculture Commissioner</u> and the ROW easement land-holding agencies where appropriate. The application of herbicides shall be in compliance with all State and federal laws and regulations under the prescription of a Pest Control Advisor (PCA) and implemented by a Licensed Qualified Applicator. Where manual and/or mechanical methods are used, disposal of the plant debris will follow the regulations set by the <u>Riverside County Agriculture Commissioner and/or San Diego County Agriculture Commissioner</u>. The timing of the weed control treatment shall be determined for each plant species in consultation with the PCA, <u>Riverside County Agriculture Commissioner</u>, the San Diego County Agriculture Commissioner, and Cal-IPC with the goal of controlling populations before they start producing seeds.</p>

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Comment Set B0018, cont.
The Nevada Hydro Company Inc

**REVISED “ADDITIONAL MITIGATION MEASURES”
LEAPS GENERATION AND TRANSMISSION ALTERNATIVE
(Continued)**

Number	Mitigation Measure
B-3a(LE) (Cont.)	<p>For the lifespan of the project, long-term measures to control the introduction and spread of noxious weeds in the project area shall be taken as follows. [A] From the time construction begins until two <u>three</u> years after construction is complete, annual surveying for new invasive weed populations and the monitoring of identified and treated populations shall be required in the survey areas described above. After this time, surveying for new invasive weed populations and monitoring of identified and treated populations shall be required at an interval of every two years. However, the treatment of weeds shall occur on a minimum annual basis. [B] During project construction and operation/maintenance, all seeds and straw materials shall be certified weed free, and all gravel and fill material shall be certified weed free by the <u>Riverside County Agriculture Commissioner’s Office and/or San Diego County Agriculture Commissioner’s Office</u>. [C] During project construction and operation/maintenance, vehicles and all equipment shall be washed (including wheels, undercarriages, and bumpers) before and after entering all project areas. In addition, tools such as chainsaws, hand clippers, pruners, etc. shall be washed before and after entering all project areas. All washing shall take place where rinse water is collected and disposed of in either a sanitary sewer or landfill. A written daily log shall be kept for all vehicle/equipment/tool washing that states the date, time, location, type of equipment washed, methods used, and staff present. The log shall include the signature of a responsible staff member. Logs shall be available to the Lead Agencies and other agencies with jurisdiction over the project for inspection at any time and shall be submitted to the Lead Agencies on a monthly basis.</p>
B-4a(LE)	<p>Erosion Control Plan. A plan including the requirements defined in USFS-15, <u>as presented in the Applicant’s PEA</u>, shall also be developed for non-Forest Service lands.</p>
B-5a(LE)	<p>Conduct rare plant surveys, and implement appropriate avoidance/minimization/compensation strategies. A qualified biologist shall survey for special status plants in the spring prior to initiating construction activities in a given area. A report of special status plants observed shall be prepared and submitted for approval by the Lead Agencies and other agencies with jurisdiction over the project prior to activities which may impact the plant resources. <u>These surveys would be conducted on non-federal lands in Riverside County in accordance with the guidelines established in the Riverside County MSHCP to assure consistency with that plan.</u></p> <p>All special status plant populations shall be staked or flagged by a qualified biologist approved by the Lead Agencies and other agencies with jurisdiction over the project. All stakes, flagging, or fencing shall be removed no later than 30 days after construction is complete.</p> <p>Impacts to federal or State listed plant species shall first be avoided where feasible, and, where not feasible, impacts shall be compensated through salvage and relocation (salvage and relocation for plants in CNF shall be determined in consultation with, and approval of, USDA Forest Service) via a restoration program and/or off-site acquisition and preservation of habitat containing the plant at a 2:1 ratio. Avoidance may not be feasible due to physical or safety constraints. The Lead Agencies and other agencies with jurisdiction over the project shall decide whether the Applicant can restore rare plant populations or shall acquire habitat with rare plant populations off site (locations to be approved by the Lead Agencies and other agencies with jurisdiction over the project. <u>On lands under the jurisdiction of the Riverside County MSHCP, a “Determination of Biological Equivalent or Superior Preservation” (DBESP), or equivalent, shall be completed and approved to assure consistency with the requirements of that plan.</u> A qualified biologist shall prepare a Restoration Plan that shall indicate where restoration would take place. The restoration plan shall also identify the goals of the restoration, responsible parties, methods of restoration implementation, maintenance and monitoring requirements, final success criteria, and contingency measures. The Applicant shall work with the Lead Agencies and other agencies with jurisdiction over the project until a plan is approved by all.</p> <p>Impacts to moderately sensitive plant species (i.e., USDA Forest Service Sensitive, CNPS List 1 and 2 species) shall first be avoided where feasible, and, where not feasible, impacts shall be compensated through reseeded (with locally collected seed stock) or relocation to temporarily disturbed areas (reseeded and relocation of plants in CNF shall be determined by the USDA Forest Service). Avoidance may not be feasible due to physical or safety constraints. Mitigation Measure B-1a(LE) would also provide habitat-based mitigation for these impacts.</p> <p>Where reseeded or salvage and relocation is required, the Applicant shall identify a qualified Habitat Restoration Specialist to be approved by the Lead Agencies and other agencies with jurisdiction over the project. The Habitat Restoration Specialist shall prepare and implement a Restoration Plan for reseeded or salvaging and relocating special status plant species to be approved by the Lead Agencies and other agencies with jurisdiction over the project in writing prior to impacting the plant resources. The Applicant shall work with the above-listed agencies until a plan is approved by all. The reseeded or relocation of plants shall be maintained and monitored for five years after installation, or until established success criteria are met, to assess progress and identify potential problems with the mitigation. Remedial action (e.g., additional seeding, weeding, erosion control, use of container stock, supplemental watering, etc.) shall be taken during the maintenance and monitoring period if necessary to ensure the success of the restoration. If the restoration fails to meet the established performance criteria after the five-year maintenance and monitoring period, maintenance and monitoring shall extend beyond the five-year period until the criteria are met or unless otherwise approved by the Lead Agencies and other agencies with jurisdiction over the project.</p>

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