



Denise Duffy & Associates, Inc.

PLANNING AND ENVIRONMENTAL CONSULTING

August 27, 2025

Mr. John Forsythe
California Public Utilities Commission
Energy Division
505 Van Ness Avenue
San Francisco, CA 94102

Re: Monterey Peninsula Water Supply Project: Notice to Proceed Request No. 5a (NTPR-5a) for Preliminary Site Preparation at the Desalination Plant – Response to Request for Supplemental Information

Dear Mr. Forsythe,

California American Water Company (“CalAm”) submitted Notice to Proceed Request No. 5a (“NTPR”) for preliminary site preparation activities at the Desalination Plant, part of the CPUC approved Monterey Peninsula Water Supply Project (“MPWSP”), to the California Public Utilities Commission (“CPUC”) on June 13, 2025.

Following CPUC’s initial review of the NTPR, CalAm’s environmental consultant, Denise Duffy & Associates (“DD&A”), met with CPUC staff and their environmental consultant, Environmental Science Associates (“ESA”), to review preliminary comments and identify areas where additional information would be helpful. Since then, DD&A has coordinated with CalAm and their design-build construction manager, CDM Smith, to provide updated material for CPUC and ESA’s consideration.

As part of this effort, DD&A updated the mitigation measure tracking matrices to document compliance with the applicable requirements of the Mitigation Monitoring, Compliance, and Reporting Program (“MMCRP”). The revised matrices are attached, along with a brief discussion documenting how this NTPR is consistent with the MMCRP. Updates from the original NTPR submittal are shown in underline.

In addition, the link below includes the supplemental material for review.

<https://ddaplanning.sharefile.com/public/share/web-scc5dcb262e2d41cfbfd3bed112f0090a>

Sincerely,

Conor O'Toole
Deputy Project Manager
Denise Duffy & Associates, Inc

ATTACHMENTS

Attachment A – Tables of Applicable Mitigation Measures Identified in Approved MMCRP

Appendix A-1: Pre-Construction FEIR/EIS Mitigation Measures

Appendix A-2: During Construction FEIR/EIS Mitigation Measures

Appendix A-3: Post-Construction/Operational FEIR/EIS Mitigation Measures

CPUC/ESA Supplemental Information

1. MM 4.6-1h: Burrowing Owl Survey Results
2. MM 4.6-1n: MPWSP Phase 1 Habitat Mitigation and Monitoring Plan
3. MM 4.6-4: Local Tree Ordinance – DD&A Arborist Qualifications
4. MM 4.10-1c: Previously Approved Construction Fugitive Dust Control Plan from Carmel Valley Pump Station (CVPS)
5. MM 4.13-1a & 1b: Location of Existing Utility Lines
 - a. CVPS Approval Approach
6. MM 4.13-1c: Health & Safety Plan
7. MM 4.13-1e: Notes on Construction Plans
8. MM 4.13-2: Monterey County Construction & Demolition Recycling Form
9. MM 4.18-1: Construction Equipment & Vehicle Efficiency Plan
10. Monterey County Grading Permit Approval

Appendix A

Tables of Applicable Mitigation Measures Identified in Approved MMCRP

A-1. Pre-Construction FEIR/EIS Mitigation Measures

A-2. During Construction FEIR/EIS Mitigation Measures

A-3. Post-Construction/During Operation FEIR/EIS Mitigation Measures

A-1. Pre-Construction FEIR/EIS Mitigation Measures

**Monterey Peninsula Water Supply Project
Desalination Plant Phase 1
Pre-Construction FEIR/EIS Mitigation Measures**

MM #	Condition Name	Status	Status Detail
4.3-4	Operational Discharge Monitoring, Analysis, Reporting, and Compliance	N/A	<u>This mitigation measure is applicable to the Desalination Plant during operation. Please see Appendix A-3 for further discussion.</u>
4.3-5	Implement Protocols to Avoid Exceeding Water Quality Objectives	N/A	<u>This mitigation measure is applicable to the Desalination Plant during operation. Please see Appendix A-3 for further discussion.</u>
4.6-1a	Retain a Lead Biologist to Oversee Implementation of Protective Measures	Complete	<u>CalAm retained Denise Duffy & Associates (“DD&A”) to provide environmental oversight for this phase of the project. Matt Johnson, Senior Environmental Scientist with DD&A, will serve as Lead Biologist. Mr. Johnson has previously served in this role for other MPWSP project components.</u>
4.6-1b	Construction Worker Environmental Awareness Training and Education Program	Complete	Video completed for WEAT presentation; CalAm previously submitted a copy of the training transcript/DVD as part of previous NTPR submittals. All construction personnel associated with this NTPR will undergo the construction WEAT program prior to the start of construction. Names of all personnel who attended the training with signed acknowledgement forms will be submitted to the CPUC following the pre-construction training.
4.6-1c	General Avoidance and Minimization Measures	On-going	CalAm has retained a Lead Biologist that will be responsible for overseeing on-going monitoring in connection with construction-related activities. On-site biological monitors will be present during construction consistent with the requirements of this mitigation measure. Additionally, the General Avoidance and Minimization Measures are included as Appendix C-1 .
4.6-1e	Avoidance and Minimization Measures for Special-status Plants	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete. <u>DD&A will provide the Rare Plant Survey Results as part of a supplemental submittal prior to construction.</u>
4.6-1f	Avoidance and Minimization Measures for Smith’s Blue Butterfly	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1f as applying to the Desalination Plant, the EIR/EIS (pp. 4.6-180 and 4.6-243) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for Smith’s Blue Butterfly. Instead, this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1g	Avoidance and Minimization Measures for Black Legless Lizard, Silvery Legless Lizard, and Coast Horned Lizard	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1g as applying to the Desalination Plant, the EIR/EIS (p. 4.6-181) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for Black Legless Lizard, Silvery Legless Lizard, and Coast Horned Lizard. Instead,</u>

MM #	Condition Name	Status	Status Detail
			<u>this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignments), ASR Wells, New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1h	Avoidance and minimization Measures for Western Burrowing Owl.	<u>On-going</u>	<u>While the MMCRP lists Mitigation Measure 4.6-1h as applying to the Desalination Plant, the EIR/EIS (p. 4.6-182) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Western Burrowing Owl. Instead, this measure applies to the following components: Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u> <u>DD&A has, however, included the Burrowing Owl Survey Results as Attachment 1 to this transmittal for reference.</u>
4.6-1i	Avoidance and Minimization Measures for Nesting Birds	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete.
4.6-1j	Avoidance and Minimization Measures for American Badger	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete.
4.6-1k	Avoidance and Minimization Measures for Monterey Dusky-Footed Woodrat	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1k as applying to the Desalination Plant, the EIR/EIS (p. 4.6-187) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Monterey Dusky-Footed Woodrat. Instead, this measure applies to the following components: ASR Wells, New Transmission Main (including optional alignment), Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, Main System–Hidden Hills Interconnection Improvements, and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1l	Avoidance and Minimization Measures for Special-Status Bats	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete.
4.6-1m	Avoidance and Minimization Measures for Native Stands of Monterey Pines.	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1m as applying to the Desalination Plant, the EIR/EIS (p. 4.6-190) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Native Stands of Monterey Pines. Instead, this component applies to the following components: Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, and Main System–Hidden Hills Interconnection Improvements. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1n	Habitat Mitigation and Monitoring Plan	Complete	The Habitat Monitoring and Mitigation Plan for Phase 1 of the MPWSP was submitted to the CPUC as part of NTPR-1. No further documentation is warranted at this stage.

MM #	Condition Name	Status	Status Detail
			DD&A has included the Phase 1 Habitat Monitoring and Mitigation Plan as Attachment 2 to this submittal.
4.6-1o	Avoidance and Minimization Measures for California Red-Legged Frog and California Tiger Salamander	Scheduled	Pre-construction surveys will be completed prior to the start of construction. The survey results will be submitted to the CPUC following completion of the surveys. In addition, a relocation plan will be submitted to the USFWS and CDFW for approval prior to the start of construction. <i>The USFWS is currently reviewing the California Tiger Salamander Relocation Plan. Once the California Tiger Salamander Relocation Plan is approved by USFWS, DD&A will provide a copy of the approved plan prior to the start of construction.</i>
4.6-1p	Control Measures for Spread of Invasive Plants	On-going	This measure will be monitored by the Lead Biologist during construction.
4.6-2a	Consultation with Local Agencies and the California Coastal Commission Regarding Environmentally Sensitive Habitat Areas	N/A	This NTPR does not include any work within the Coastal Zone or ESHA. <u>While the MMCRP lists Mitigation Measure 4.6-2a as applying to the Desalination Plant, the EIR/EIS (p. 4.6-218) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not include any ESHA habitat. Instead, this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-2b	Avoid, Minimize, and Compensate for Construction Impacts to Sensitive Communities and Environmentally Sensitive Habitat Areas	N/A	This NTPR does not include any work within the Coastal Zone or ESHA.
4.6-3	Avoid, Minimize, and or Mitigate Impacts to Wetlands.	N/A	This NTPR does not include work within riparian or wetland habitat. <u>While the MMCRP lists Mitigation Measure 4.6-3 as applying to the Desalination Plant, the EIR/EIS (p. 4.6-232) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, there are no wetlands or aquatic features on the Desalination Plant site. Instead, this measure applies to the following components: New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignment), New Transmission Main (including optional alignment), Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, and Main System–Hidden Hills Interconnection Improvements. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-4	Compliance with Local Tree Ordinances	<u>Complete</u>	This NTPR includes the removal of up to removal of 13 trees (12 Monterey cypress and 1 blue gum eucalyptus) and potential removal of up to 10 additional trees (10 Monterey

MM #	Condition Name	Status	Status Detail
			cypress). These trees are not protected under local tree ordinances and do not require a tree removal permit. As a result, this mitigation measure is not applicable. <u>DD&A included the Qualifications for DD&A's Qualified Arborist as Attachment 3 to this submittal.</u>
4.6-6	Installation and Monitoring of Bird Deterrents at the Brine Storage Basin	N/A	This mitigation measure is applicable to the Desalination Plant during operation. Please see Appendix A-3 for further discussion.
4.7-2a	Health and Safety Plan	Complete	The Health and Safety Plan is included as Appendix C-2 . <u>DD&A included the revised Health & Safety Plan as Attachment 6 that includes the requirements of MM 4.13-1c to this submittal.</u>
4.7-2b	Soil and Groundwater Management Plan	Scheduled	The Soil and Groundwater Management Plan will be submitted prior to the start of construction.
4.9-1	Traffic Control and Safety Assurance Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. No work is proposed within public rights-of-way; therefore, this mitigation measure is not applicable.
4.9-6	Roadway Rehabilitation Program	On-going	Contractor/CalAm to prepare pre-construction photos; videos will be georeferenced and submitted upon request. <u>Attachment 10 includes the Monterey County Grading Permit which requires roads to be restored to their original condition after the completion of construction. CalAm is also coordinating with ReGen Monterey on access options for construction. Additionally, the Construction Management Plan, which shows access locations, is being prepared by CalAm and will be provided to ESA and CPUC when it becomes available.</u>
4.9-7	Construction Parking Requirements	N/A	<u>While the MMCRP lists Mitigation Measure 4.9-7 as applying to the Desalination Plant, the EIR/EIS (p. 4.9-33) states that the 46-acre parcel for the plant can accommodate construction worker parking. As a result, there would be no effect on parking availability in public areas during construction of this component. Therefore, Mitigation Measure 4.9-7 is not applicable to the Desalination Plant.</u>
4.9-C	Construction Traffic Coordination Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. No work is proposed within public rights-of-way; therefore, this mitigation measure is not applicable.
4.10-1a	Equipment with High-Tiered Engine Standards	Complete	The Construction Equipment and Vehicle Efficiency Plan is included as Appendix C-3 .
4.10-1b	Idling Restrictions	Complete	The Construction Equipment and Vehicle Efficiency Plan is included as Appendix C-3 .
4.10-1c	Construction Fugitive Dust Control Plan	Complete	The requirements of this mitigation measure are included as part of the Construction Equipment and Vehicle Efficiency Plan, which is included as Appendix C-3 .

MM #	Condition Name	Status	Status Detail
			<i><u>DD&A also included the Construction Fugitive Dust Control Plan from the Carmel Valley Pump Station project component as Attachment 4 to the supplemental NTP Request submittal to show an example of what ESA and CPUC previously approved.</u></i>
4.10-1e	Off-site Mitigation Program	<u>On-going</u>	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals. <i><u>DD&A is coordinating with Monterey Bay Air Resources District (“MBARD”) to document compliance with this mitigation measure. Additional information will be provided to ESA and CPUC when it becomes available.</u></i>
4.11-1	GHG Emissions Reductions Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals. <i><u>DD&A will provide the GHG Emission Reduction Plan prior to construction of Phase 2 of the Desalination Plant.</u></i>
4.12-1a	Neighborhood Notice and Construction Disturbance Coordination	N/A	<i><u>While the MMCRP lists Mitigation Measure 4.12-1a as applying to the Desalination Plant, the EIR/EIS (p. 4.12-37) specifies that this measure does not apply to this component. Specifically, the nearest home in proximity to the Desalination Plant site is approximately 0.5 miles away. Instead, this measure applies to the following components: New Desalinated Water Pipeline, Castroville Pipeline (including optional alignment), New Transmission Main, ASR Wells, and Carmel Valley Pump Station. Separate NTPR submittals for these components will address this mitigation measure.</u></i> <i><u>See text references above. Additionally, there are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</u></i>
4.12-1b	General Noise Controls for Construction Equipment	N/A	<i><u>While the MMCRP lists Mitigation Measure 4.12-1b as applying to the Desalination Plant, the EIR/EIS (pp. 4.6-196, 4.12-37, 4.12-46) specifies that this measure does not apply to this component. Instead, it applies to the following components: Subsurface Slant Wells, Source Water Pipeline (west of Highway 1), New Desalinated Water Pipeline, Castroville Pipeline (including optional alignment), New Transmission Main, ASR Wells, and Carmel Valley Pump Station. Separate NTPR submittals for these components will address this mitigation measure.</u></i> <i><u>See text references above. Additionally, there are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</u></i>
4.12-1c	Noise Control Plan for Nighttime Pipeline Construction	N/A	<i><u>While the MMCRP lists Mitigation Measure 4.12-1c as applying to the Desalination Plant, the EIR/EIS (pp. 4.12-38, 4.12-46, 4.12-55) specifies that this measure does not apply to</u></i>

MM #	Condition Name	Status	Status Detail
			this component. Instead, it applies to the following components: New Desalinated Water Pipeline, Castroville Pipeline (including optional alignment), New Transmission Main, and ASR-5 and ASR-6 Wells. Separate NTPR submittals for these components will address this mitigation measure. <i>There is no nighttime pipeline construction associated with the Desalination Plant. Therefore, this mitigation measure is not applicable.</i>
4.12-1e	Offsite Accommodations for Substantially Affected Nighttime Receptors.	N/A	While the MMCRP lists Mitigation Measure 4.12-1e as applying to the Desalination Plant, the EIR/EIS (p. 4.12-38) specifies that this measure does not apply to this component. Instead, it applies to the ASR Wells. Separate NTPR submittals for these components will address this mitigation measure. <i>See text references above. There are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</i>
4.12-3	Vibration Reduction Measures	N/A	While the MMCRP lists Mitigation Measure 4.12-3 as applying to the Desalination Plant, the EIR/EIS (p. 4.12-53) specifies that this measure does not apply to this component. Instead, it applies to the following components: New Desalinated Water Pipeline and New Transmission Main, if trenchless construction is required. Separate NTPR submittals for these components will address this mitigation measure. <i>See text references above. There is no pipeline construction associated with the Desalination Plant and no sensitive receptors in the vicinity of the project. Therefore, this mitigation measure is not applicable.</i>
4.12-5	Stationary Noise Controls	N/A	While the MMCRP lists Mitigation Measure 4.12-5 as applying to the Desalination Plant, the EIR/EIS (p. 4.12-60) specifies that this measure does not apply to this component. Instead, it applies to the following components: ASR Wells and Main System–Hidden Hills Interconnection. Separate NTPR submittals for these components will address this mitigation measure. <i>See text references above. Additionally, there are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</i>
4.13-1a	Locate and Confirm Utility Lines	Scheduled	CalAm will coordinate with the Underground Service Alert (“USA”) to identify the location of utility lines prior to construction. <i>DD&A included the Location of Existing Utility Lines as Attachment 5 to this submittal. Additionally, DD&A provided the NTP Request Approval from the Carmel Valley Pump Station as Attachment 5a as an example of how ESA and CPUC conditionally approved the NTP Request pending submittal of USA utility tickets.</i>
4.13-1b	Coordinate Final Construction Plans with Affected Utilities	Scheduled	CalAm will coordinate with local utility service providers prior to the start of construction.

MM #	Condition Name	Status	Status Detail
			<i>See discussion under MM 4.13-1a to document compliance with this mitigation measure. Additionally, DDC&A will provide utility tickets to ESA and CPUC prior to start of construction and/ or any work involving utilities.</i>
4.13-1c	Safeguard Employees from Potential Accidents Related to Underground Utilities	Complete	The requirements of this mitigation measure are included in the Health and Safety Plan, which is included as Appendix C-2 . <i>The revised Health & Safety Plan is included as Attachment 6 to this submittal.</i>
4.-13-1d	Emergency Response Plan	Complete	The requirements of this mitigation measure are included in the Health and Safety Plan, which is included as Appendix C-2 . <i>See discussion under MM 4.13-1c to document compliance with this mitigation measure.</i>
4.13-1e	Notify Local Fire Departments	Scheduled	CalAm will coordinate with the local fire department prior to the start of construction for work near gas lines. <i>DDC&A included the notes from the Desalination Plant Construction Plans, which include the requirements of this mitigation measures, as Attachment 7 to this submittal.</i>
4.13-1f	Ensure Prompt Reconnection of Utilities	On-going	<u>This mitigation measure is applicable to the Desalination Plant during construction. Please see Appendix A-2 for further discussion.</u>
4.13-2	Construction Waste Reduction and Recycling Plan	Scheduled	The Construction Waste Reduction and Recycling Plan will be submitted prior to the start of construction. <i>DDC&A included the Monterey County Construction and Demolition Recycling Form, which includes the requirements of this mitigation measure, as Attachment 8 to this submittal.</i>
4.14-1	Maintain Clean and Orderly Construction Sites	On-going	CalAm will ensure that the construction contractor adheres to the requirements of this mitigation measure during construction.
4.14-2	Site-Specific Nighttime Lighting Measures	N/A	No nighttime lighting is proposed as part of this NTPR. Therefore, this mitigation measure is not applicable.
4.14-3a	Facility Design	N/A	<u>This mitigation measure is applicable to the Desalination Plant during construction and operation. Please see Appendix A-2 and A-3 for further discussion.</u>
4.14-3b	Facility Screening	N/A	<u>This mitigation measure is applicable to the Desalination Plant during construction and operation. Please see Appendix A-2 and A-3 for further discussion.</u>
4.15-2a	Establish Archaeologically Sensitive Areas	N/A	<u>While the MMCPR lists Mitigation Measure 4.15-2a as applying to the Desalination Plant, the EIR/EIS (p. 4.15-47) specifies that this measure does not apply to this component. Instead, it applies to the Castroville Pipeline at Tembladero Slough and the Salinas River, as well as the Source Water Pipeline in the Lapis Sand Mining Plant Historic District. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.15-2b	Inadvertent Discovery of Cultural Resources	On-going	<u>See AECOM Archaeological Monitoring Plan that is attached to the MMCPR (confidential).</u>

MM #	Condition Name	Status	Status Detail
4.15-4	Inadvertent Discovery of Human Remains	On-going	<u>This mitigation measure is applicable to the Desalination Plant during construction activities. Please see Appendix A-2 for further discussion.</u>
4.16-1	Minimize Disturbance to Farmland	<u>On-going</u>	<u>While the MMCRP lists Mitigation Measure 4.16-1 as applying to the Desalination Plant, the EIR/EIS (p. 4.16-16) specifies that this measure does not apply to this component. Instead, it applies to the following components: Source Water Pipeline, New Desalinated Water Pipeline, and Castroville Pipeline. Separate NTPR submittals for these components will address this mitigation measure.</u> <u>However, DDC&A included the notes from the Desalination Plant Construction Plans, which include the requirements of this mitigation measure, as Attachment 7 to this submittal.</u>
4.18-1	Construction Equipment and Vehicle Efficiency Plan	Complete	The Construction Equipment and Vehicle Efficiency Plan is included as Appendix C-3. <u>DDC&A included the revised Construction Equipment & Vehicle Efficiency Plan, which includes the credentials of who prepared the plan, as Attachment 9 to this submittal.</u>

A-2. During Construction FEIR/EIS Mitigation Measures

**Monterey Peninsula Water Supply Project
Desalination Plant Phase 1
Construction FEIR/EIS Mitigation Measures**

MM #	Condition Name	Status	Status Detail
4.3-4	Operational Discharge Monitoring, Analysis, Reporting, and Compliance	N/A	<u>This mitigation measure is applicable to the Desalination Plant during operation. Please see Appendix A-3 for further discussion.</u>
4.3-5	Implement Protocols to Avoid Exceeding Water Quality Objectives	N/A	<u>This mitigation measure is applicable to the Desalination Plant during operation. Please see Appendix A-3 for further discussion.</u>
4.6-1a	Retain a Lead Biologist to Oversee Implementation of Protective Measures	Complete	<u>CalAm retained Denise Duffy & Associates (“DD&A”) to provide environmental oversight for this phase of the project. Matt Johnson, Senior Environmental Scientist with DD&A, will serve as Lead Biologist. Mr. Johnson has previously served in this role for other MPWSP project components.</u>
4.6-1b	Construction Worker Environmental Awareness Training and Education Program	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction activities. Please see Appendix A-1 for further discussion.</u>
4.6-1c	General Avoidance and Minimization Measures	On-going	CalAm has retained a Lead Biologist that will be responsible for overseeing on-going monitoring in connection with construction-related activities. On-site biological monitors will be present during construction consistent with the requirements of this mitigation measure. Additionally, the General Avoidance and Minimization Measures are included as Appendix C-1 .
4.6-1e	Avoidance and Minimization Measures for Special-status Plants	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete. <u>DD&A will provide the Rare Plant Survey Results as part of a supplemental submittal prior to construction.</u>
4.6-1f	Avoidance and Minimization Measures for Smith’s Blue Butterfly	N/A	<u>While the MMCPR lists Mitigation Measure 4.6-1f as applying to the Desalination Plant, the EIR/EIS (pp. 4.6-180 and 4.6-243) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for Smith’s Blue Butterfly. Instead, this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1g	Avoidance and Minimization Measures for Black Legless Lizard, Silvery Legless Lizard, and Coast Horned Lizard	N/A	<u>While the MMCPR applies Mitigation Measure 4.6-1g to the Desalination Plant, page 4.6-181 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for Black Legless Lizard, Silvery Legless Lizard, and Coast Horned Lizard. Instead, this measure is applicable to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignments), ASR Wells, New Transmission Main (including optional alignment), and Staging Areas for the pipelines. As such, separate NTPR submittals for the components above will address this mitigation measure.</u>

MM #	Condition Name	Status	Status Detail
4.6-1h	Avoidance and minimization Measures for Western Burrowing Owl.	<u>On-going</u>	<u>While the MMCRP lists Mitigation Measure 4.6-1h as applying to the Desalination Plant, the EIR/EIS (p. 4.6-182) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Western Burrowing Owl. Instead, this measure applies to the following components: Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u> <u>DD&A has, however, included the Burrowing Owl Survey Results as Attachment 1 to this transmittal for reference.</u>
4.6-1i	Avoidance and Minimization Measures for Nesting Birds	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete. The applicability of this measure will be determined based on pre-construction surveys.
4.6-1j	Avoidance and Minimization Measures for American Badger	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete. The applicability of this measure will be determined based on pre-construction surveys.
4.6-1k	Avoidance and Minimization Measures for Monterey Dusky-Footed Woodrat	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1k as applying to the Desalination Plant, the EIR/EIS (p. 4.6-187) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Monterey Dusky-Footed Woodrat. Instead, this measure applies to the following components: ASR Wells, New Transmission Main (including optional alignment), Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, Main System–Hidden Hills Interconnection Improvements, and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1l	Avoidance and Minimization Measures for Special-Status Bats	Scheduled	Pre-construction surveys and any other applicable documentation will be provided to CPUC/ESA once complete. The applicability of this measure will be determined based on pre-construction surveys.
4.6-1m	Avoidance and Minimization Measures for Native Stands of Monterey Pines.	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1m as applying to the Desalination Plant, the EIR/EIS (p. 4.6-190) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Native Stands of Monterey Pines. Instead, this component applies to the following components: Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, and Main System–Hidden Hills Interconnection Improvements. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1n	Habitat Mitigation and Monitoring Plan (HMMP)	Complete	The Habitat Monitoring and Mitigation Plan for Phase 1 of the MPWSP was submitted to the CPUC as part of NTPR-1. No further documentation is warranted at this stage. <u>DD&A has included the Phase 1 Habitat Monitoring and Mitigation Plan as Attachment 2 to this submittal.</u>

MM #	Condition Name	Status	Status Detail
4.6-1o	Avoidance and Minimization Measures for California Red-Legged Frog and California Tiger Salamander	Scheduled	Pre-construction surveys will be completed prior to the start of construction. The survey results will be submitted to the CPUC following completion of the surveys. In addition, a relocation plan will be submitted to the USFWS and CDFW for approval prior to the start of construction. <u>The USFWS is currently reviewing the California Tiger Salamander Relocation Plan. Once the California Tiger Salamander Relocation Plan is approved by USFWS, DDC&A will provide a copy of the approved plan prior to the start of construction.</u>
4.6-1p	Control Measures for Spread of Invasive Plants	On-going	This measure will be monitored by the Lead Biologist during construction.
4.6-2a	Consultation with Local Agencies and the California Coastal Commission Regarding Environmentally Sensitive Habitat Areas	N/A	This NTPR does not include any work within the Coastal Zone or ESHA. <u>While the MMCRP lists Mitigation Measure 4.6-2a as applying to the Desalination Plant, the EIR/EIS (p. 4.6-218) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not include any ESHA habitat. Instead, this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-2b	Avoid, Minimize, and Compensate for Construction Impacts to Sensitive Communities and Environmentally Sensitive Habitat Areas (ESHA)	N/A	This NTPR does not include any work within the Coastal Zone or ESHA.
4.6-3	Avoid, Minimize, and or Mitigate Impacts to Wetlands.	N/A	This NTPR does not include work within riparian or wetland habitat. <u>While the MMCRP lists Mitigation Measure 4.6-3 as applying to the Desalination Plant, the EIR/EIS (p. 4.6-232) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, there are no wetlands or aquatic features on the Desalination Plant site. Instead, this measure applies to the following components: New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignment), New Transmission Main (including optional alignment), Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, and Main System–Hidden Hills Interconnection Improvements. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-4	Compliance with Local Tree Ordinances	<u>Complete</u>	This NTPR includes the removal of up to removal of 13 trees (12 Monterey cypress and 1 blue gum eucalyptus) and potential removal of up to 10 additional trees (10 Monterey cypress). These trees are not protected under local tree ordinances and do not require a tree removal permit. As a result, this mitigation measure is not applicable.

MM #	Condition Name	Status	Status Detail
			<i>DD&A included the Qualifications for DD&A's Qualified Arborist as Attachment 3 to this submittal.</i>
4.6-6	Installation and Monitoring of Bird Deterrents at the Brine Storage Basin	N/A	This mitigation measure is applicable to the Desalination Plant during operation. Please see Appendix A-3 for further discussion.
4.7-2a	Health and Safety Plan	Complete	The Health and Safety Plan is included as Appendix C-2 . <i>DD&A included the revised Health & Safety Plan as Attachment 6 that includes the requirements of MM 4.13-1c to this submittal.</i>
4.7-2b	Soil and Groundwater Management Plan	Scheduled	The Soil and Groundwater Management Plan will be submitted prior to the start of construction.
4.9-1	Traffic Control and Safety Assurance Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. No work is proposed within public rights-of-way; therefore, this mitigation measure is not applicable.
4.9-6	Roadway Rehabilitation Program	On-going	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction post-construction activities. Please see Appendices A-1 and A-3 for further discussion.</u>
4.9-7	Construction Parking Requirements	N/A	<u>While the MMCRP lists Mitigation Measure 4.9-7 as applying to the Desalination Plant, the EIR/EIS (p. 4.9-33) states that the 46-acre parcel for the plant can accommodate construction worker parking. As a result, there would be no effect on parking availability in public areas during construction of this component. Therefore, Mitigation Measure 4.9-7 is not applicable to the Desalination Plant.</u>
4.9-C	Construction Traffic Coordination Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. No work is proposed within public rights-of-way; therefore, this mitigation measure is not applicable.
4.10-1a	Equipment with High-Tiered Engine Standards	Complete	The Construction Equipment and Vehicle Efficiency Plan is included as Appendix C-3 .
4.10-1b	Idling Restrictions	Complete	The Construction Equipment and Vehicle Efficiency Plan is included as Appendix C-3 .
4.10-1c	Construction Fugitive Dust Control Plan	Complete	The requirements of this mitigation measure are included as part of the Construction Equipment and Vehicle Efficiency Plan, which is included as Appendix C-3 . <i>DD&A also included the Construction Fugitive Dust Control Plan from the Carmel Valley Pump Station project component as Attachment 4 to the supplemental NTP Request submittal to show an example of what ESA and CPUC previously approved.</i>
4.10-1e	Off-site Mitigation Program	<u>On-going</u>	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals. <i>DD&A is coordinating with Monterey Bay Air Resources District ("MBARD") to document compliance with this mitigation measure. Additional information will be provided to ESA and CPUC when it becomes available.</i>

MM #	Condition Name	Status	Status Detail
4.11-1	GHG Emissions Reductions Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals. <i><u>DD&A will provide the GHG Emission Reduction Plan prior to construction of Phase 2 of the Desalination Plant.</u></i>
4.12-1a	Neighborhood Notice and Construction Disturbance Coordination	N/A	<u>While the MMCRP lists Mitigation Measure 4.12-1a as applying to the Desalination Plant, the EIR/EIS (p. 4.12-37) specifies that this measure does not apply to this component. Specifically, the nearest home in proximity to the Desalination Plant site is approximately 0.5 miles away. Instead, this measure applies to the following components: New Desalinated Water Pipeline, Castroville Pipeline (including optional alignment), New Transmission Main, ASR Wells, and Carmel Valley Pump Station. Separate NTPR submittals for these components will address this mitigation measure.</u> <i><u>See text references above. Additionally, there are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</u></i>
4.12-1b	General Noise Controls for Construction Equipment	N/A	<u>While the MMCRP lists Mitigation Measure 4.12-1b as applying to the Desalination Plant, the EIR/EIS (pp. 4.6-196, 4.12-37, 4.12-46) specifies that this measure does not apply to this component. Instead, it applies to the following components: Subsurface Slant Wells, Source Water Pipeline (west of Highway 1), New Desalinated Water Pipeline, Castroville Pipeline (including optional alignment), New Transmission Main, ASR Wells, and Carmel Valley Pump Station. Separate NTPR submittals for these components will address this mitigation measure.</u> <i><u>See text references above. Additionally, there are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</u></i>
4.12-1c	Noise Control Plan for Nighttime Pipeline Construction	N/A	<u>While the MMCRP lists Mitigation Measure 4.12-1c as applying to the Desalination Plant, the EIR/EIS (pp. 4.12-38, 4.12-46, 4.12-55) specifies that this measure does not apply to this component. Instead, it applies to the following components: New Desalinated Water Pipeline, Castroville Pipeline (including optional alignment), New Transmission Main, and ASR-5 and ASR-6 Wells. Separate NTPR submittals for these components will address this mitigation measure.</u> <i><u>There is no nighttime pipeline construction associated with the Desalination Plant. Therefore, this mitigation measure is not applicable.</u></i>
4.12-1e	Offsite Accommodations for Substantially Affected Nighttime Receptors.	N/A	<u>While the MMCRP lists Mitigation Measure 4.12-1e as applying to the Desalination Plant, the EIR/EIS (p. 4.12-38) specifies that this measure does not apply to this component. Instead, it applies to the ASR Wells. Separate NTPR submittals for these components will address this mitigation measure.</u>

MM #	Condition Name	Status	Status Detail
			<i>See text references above. There are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</i>
4.12-3	Vibration Reduction Measures	N/A	While the MMCRP lists Mitigation Measure 4.12-3 as applying to the Desalination Plant, the EIR/EIS (p. 4.12-53) specifies that this measure does not apply to this component. Instead, it applies to the following components: New Desalinated Water Pipeline and New Transmission Main, if trenchless construction is required. Separate NTPR submittals for these components will address this mitigation measure. <i>See text references above. There is no pipeline construction associated with the Desalination Plant and no sensitive receptors in the vicinity of the project. Therefore, this mitigation measure is not applicable.</i>
4.12-5	Stationary Noise Controls	N/A	While the MMCRP lists Mitigation Measure 4.12-5 as applying to the Desalination Plant, the EIR/EIS (p. 4.12-60) specifies that this measure does not apply to this component. Instead, it applies to the following components: ASR Wells and Main System–Hidden Hills Interconnection. Separate NTPR submittals for these components will address this mitigation measure. <i>See text references above. Additionally, there are no sensitive receptors near the Desalination Plant. Therefore, this mitigation measure is not applicable.</i>
4.13-1a	Locate and Confirm Utility Lines	Scheduled	CalAm will coordinate with the Underground Service Alert (“USA”) to identify the location of utility lines prior to construction. <i>DD&A included the Location of Existing Utility Lines as Attachment 5 to this submittal. Additionally, DD&A provided the NTP Request Approval from the Carmel Valley Pump Station as Attachment 5a as an example of how ESA and CPUC conditionally approved the NTP Request pending submittal of USA utility tickets.</i>
4.13-1b	Coordinate Final Construction Plans with Affected Utilities	Scheduled	CalAm will coordinate with local utility service providers prior to the start of construction. <i>See discussion under MM 4.13-1a to document compliance with this mitigation measure. Additionally, DD&A will provide utility tickets to ESA and CPUC prior to start of construction and/or any work involving utilities.</i>
4.13-1c	Safeguard Employees from Potential Accidents Related to Underground Utilities	Complete	The requirements of this mitigation measure are included in the Health and Safety Plan, which is included as Appendix C-2. <i>The revised Health & Safety Plan is included as Attachment 6 to this submittal.</i>
4.13-1d	Emergency Response Plan	Complete	The requirements of this mitigation measure are included in the Health and Safety Plan, which is included as Appendix C-2. <i>See discussion under MM 4.13-1c to document compliance with this mitigation measure.</i>
4.13-1e	Notify Local Fire Departments	Scheduled	CalAm will coordinate with the local fire department prior to the start of construction for work near gas lines.

MM #	Condition Name	Status	Status Detail
			<u>DD&A included the notes from the Desalination Plant Construction Plans, which include the requirements of this mitigation measures, as Attachment 7 to this submittal.</u>
4.13-1f	Ensure Prompt Reconnection of Utilities	On-going	<u>CalAm will ensure that the construction contractor adheres to the requirements of this mitigation measure during construction and will submit documentation coordinating with any affected utilities as needed.</u>
4.13-2	Construction Waste Reduction and Recycling Plan	Scheduled	The Construction Waste Reduction and Recycling Plan will be submitted prior to the start of construction. <u>DD&A included the Monterey County Construction and Demolition Recycling Form, which includes the requirements of this mitigation measure, as Attachment 8 to this submittal.</u>
4.14-1	Maintain Clean and Orderly Construction Sites	On-going	CalAm will ensure that the construction contractor adheres to the requirements of this mitigation measure during construction.
4.14-2	Site-Specific Nighttime Lighting Measures	N/A	No nighttime lighting is proposed as part of this NTPR. Therefore, this mitigation measure is not applicable.
4.14-3a	Facility Design	N/A	<u>While the MMCRP applies Mitigation Measure 4.14-3a to the Desalination Plant, page 4.14-43 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant. Additionally, the scope of work associated with construction of Phase 1 does not include any above ground elements. Instead, this measure is applicable to the following components: Subsurface Slant Wells and the ASR Wells. Additionally, the EIR/EIS states that this measure could apply to other components, but would not be required to avoid a significant impact. As such, separate NTPR submittals for the components above will address this mitigation measure.</u>
4.14-3b	Facility Screening	N/A	<u>While the MMCRP applies Mitigation Measure 4.14-3b to the Desalination Plant, page 4.14-43 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant. Additionally, the scope of work associated with construction of Phase 1 does not include any above ground elements. Instead, this measure is applicable to the ASR Wells. Additionally, the EIR/EIS states that this measure could apply to other components, but would not be required to avoid a significant impact. As such, the NTPR submittals for the ASR Wells will address this mitigation measure.</u>
4.15-2a	Establish Archaeologically Sensitive Areas	N/A	<u>While the MMCRP applies Mitigation Measure 4.15-2a to the Desalination Plant, page 4.15-47 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant and is instead applicable to the Castroville Pipeline at Tembladero Slough and the Salinas River and the Source Water Pipeline in the Lapis Sand Mining Plant Historic District. As such, separate NTPR submittals for the components above will address this mitigation measure.</u>
4.15-2b	Inadvertent Discovery of Cultural Resources	On-going	<u>See AECOM Archaeological Monitoring Plan that is attached to the MMCRP (confidential).</u>
4.15-4	Inadvertent Discovery of Human Remains	On-going	<u>See AECOM Archaeological Monitoring Plan that is attached to the MMCRP (confidential).</u>
4.16-1	Minimize Disturbance to Farmland	<u>On-going</u>	<u>While the MMCRP lists Mitigation Measure 4.16-1 as applying to the Desalination Plant, the EIR/EIS (p. 4.16-16) specifies that this measure does not apply to this component. Instead, it</u>

MM #	Condition Name	Status	Status Detail
			<u>applies to the following components: Source Water Pipeline, New Desalinated Water Pipeline, and Castroville Pipeline. Separate NTPR submittals for these components will address this mitigation measure.</u> <u>However, DD&A included the notes from the Desalination Plant Construction Plans, which include the requirements of this mitigation measure, as Attachment 7 to this submittal.</u>
4.18-1	Construction Equipment and Vehicle Efficiency Plan	Complete	The Construction Equipment and Vehicle Efficiency Plan is included as Appendix C-3. <u>DD&A included the revised Construction Equipment & Vehicle Efficiency Plan, which includes the credentials of who prepared the plan, as Attachment 9 to this submittal.</u>

A-3. Post-Construction/During Operation FEIR/EIS Mitigation Measures

Monterey Peninsula Water Supply Project
Desalination Plant Phase 1
Post-Construction/Operational Mitigation Measures

MM #	Condition Name	Status	Status Detail
4.3-4	Operational Discharge Monitoring, Analysis, Reporting, and Compliance	N/A	<u>This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP FEIR/EIS, preliminary site preparation, and rough grading. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals.</u>
4.3-5	Implement Protocols to Avoid Exceeding Water Quality Objectives	N/A	<u>This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS, preliminary site preparation, and rough grading. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals.</u>
4.6-1a	Retain a Lead Biologist to Oversee Implementation of Protective Measures	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.6-1b	Construction Worker Environmental Awareness Training and Education Program	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction activities. Please see Appendix A-1 for further discussion.</u>
4.6-1c	General Avoidance and Minimization Measures	On-going	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.6-1e	Avoidance and Minimization Measures for Special-status Plants	Scheduled	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.6-1f	Avoidance and Minimization Measures for Smith's Blue Butterfly	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1f as applying to the Desalination Plant, the EIR/EIS (pp. 4.6-180 and 4.6-243) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for Smith's Blue Butterfly. Instead, this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-1g	Avoidance and Minimization Measures for Black Legless Lizard, Silvery Legless Lizard, and Coast Horned Lizard	N/A	<u>While the MMCRP applies Mitigation Measure 4.6-1g to the Desalination Plant, page 4.6-181 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for Black Legless Lizard, Silvery Legless Lizard, and Coast Horned Lizard. Instead, this measure is applicable to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignments), ASR Wells, New Transmission Main (including optional alignment), and Staging Areas for the pipelines. As such, separate NTPR submittals for the components above will address this mitigation measure.</u>
4.6-1h	Avoidance and minimization Measures for Western Burrowing Owl.	N/A	<u>While the MMCRP lists Mitigation Measure 4.6-1h as applying to the Desalination Plant, the EIR/EIS (p. 4.6-182) specifies that this measure does not apply to this component. As</u>

MM #	Condition Name	Status	Status Detail
			discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Western Burrowing Owl. Instead, this measure applies to the following components: Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure. <i>DD&A has, however, included the Burrowing Owl Survey Results as Attachment 1 to this transmittal for reference.</i>
4.6-1i	Avoidance and Minimization Measures for Nesting Birds	Scheduled	This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.
4.6-1j	Avoidance and Minimization Measures for American Badger	Scheduled	This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.
4.6-1k	Avoidance and Minimization Measures for Monterey Dusky-Footed Woodrat	N/A	While the MMCRP lists Mitigation Measure 4.6-1k as applying to the Desalination Plant, the EIR/EIS (p. 4.6-187) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Monterey Dusky-Footed Woodrat. Instead, this measure applies to the following components: ASR Wells, New Transmission Main (including optional alignment), Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, Main System–Hidden Hills Interconnection Improvements, and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.
4.6-1l	Avoidance and Minimization Measures for Special-Status Bats	Scheduled	This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.
4.6-1m	Avoidance and Minimization Measures for Native Stands of Monterey Pines.	N/A	While the MMCRP lists Mitigation Measure 4.6-1m as applying to the Desalination Plant, the EIR/EIS (p. 4.6-190) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not provide suitable habitat for the Native Stands of Monterey Pines. Instead, this component applies to the following components: Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, and Main System–Hidden Hills Interconnection Improvements. Separate NTPR submittals for these components will address this mitigation measure.
4.6-1n	Habitat Mitigation and Monitoring Plan	Complete	The Habitat Monitoring and Mitigation Plan for Phase 1 of the MPWSP was submitted to the CPUC as part of NTPR-1. No further documentation is warranted at this stage. <i>DD&A has included the Phase 1 Habitat Monitoring and Mitigation Plan as Attachment 2 to this submittal.</i>
4.6-1o	Avoidance and Minimization Measures for California Red-Legged Frog and California Tiger Salamander	Scheduled	Pre-construction surveys will be completed prior to the start of construction. The survey results will be submitted to the CPUC following completion of the surveys. In addition, a relocation plan will be submitted to the USFWS and CDFW for approval prior to the start of construction.

MM #	Condition Name	Status	Status Detail
			<i>The USFWS is currently reviewing the California Tiger Salamander Relocation Plan. Once the California Tiger Salamander Relocation Plan is approved by USFWS, DD&A will provide a copy of the approved plan prior to the start of construction.</i>
4.6-1p	Control Measures for Spread of Invasive Plants	On-going	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.6-2a	Consultation with Local Agencies and the California Coastal Commission Regarding Environmentally Sensitive Habitat Areas	N/A	<u>This NTPR does not include any work within the Coastal Zone or ESHA.</u> <u>While the MMCPR lists Mitigation Measure 4.6-2a as applying to the Desalination Plant, the EIR/EIS (p. 4.6-218) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, the Desalination Plant site does not include any ESHA habitat. Instead, this measure applies to the following components: Subsurface Slant Wells, Source Water Pipeline (including optional alignment), New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignment), New Transmission Main (including optional alignment), and associated staging areas. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-2b	Avoid, Minimize, and Compensate for Construction Impacts to Sensitive Communities and Environmentally Sensitive Habitat Areas (ESHA)	N/A	<u>This NTPR does not include any work within the Coastal Zone or ESHA.</u>
4.6-3	Avoid, Minimize, and or Mitigate Impacts to Wetlands	N/A	<u>This NTPR does not include work within riparian or wetland habitat.</u> <u>While the MMCPR lists Mitigation Measure 4.6-3 as applying to the Desalination Plant, the EIR/EIS (p. 4.6-232) specifies that this measure does not apply to this component. As discussed in the MPWSP EIR/EIS, there are no wetlands or aquatic features on the Desalination Plant site. Instead, this measure applies to the following components: New Desalinated Water Pipeline (including optional alignment), Castroville Pipeline (including optional alignment), New Transmission Main (including optional alignment), Carmel Valley Pump Station, Ryan Ranch–Bishop Interconnection Improvements, and Main System–Hidden Hills Interconnection Improvements. Separate NTPR submittals for these components will address this mitigation measure.</u>
4.6-4	Compliance with Local Tree Ordinances	<u>Complete</u>	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.6-6	Installation and Monitoring of Bird Deterrents at the Brine Storage Basin	N/A	<u>This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP FEIR/EIS, preliminary site preparation, and rough grading. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of the operation of the brine storage.</u>
4.7-2a	Health and Safety Plan	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.7-2b	Soil and Groundwater Management Plan	Scheduled	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>

MM #	Condition Name	Status	Status Detail
4.9-1	Traffic Control and Safety Assurance Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. No work is proposed within public rights-of-way; therefore, this mitigation measure is not applicable.
4.9-6	Roadway Rehabilitation Program	On-going	Contractor/CalAm to prepare pre-construction photos; videos will be georeferenced and submitted upon request. <u><i>Attachment 10 includes the Monterey County Grading Permit which requires roads to be restored to their original condition after the completion of construction. CalAm is also coordinating with ReGen Monterey on access options for construction. Additionally, the Construction Management Plan, which shows access locations, is being prepared by CalAm and will be provided to ESA and CPUC when it becomes available.</i></u>
4.9-7	Construction Parking Requirements	N/A	<u>While the MMCPR lists Mitigation Measure 4.9-7 as applying to the Desalination Plant, the EIR/EIS (p. 4.9-33) states that the 46-acre parcel for the plant can accommodate construction worker parking. As a result, there would be no effect on parking availability in public areas during construction of this component. Therefore, Mitigation Measure 4.9-7 is not applicable to the Desalination Plant.</u>
4.9-C	Construction Traffic Coordination Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. No work is proposed within public rights-of-way; therefore, this mitigation measure is not applicable.
4.10-1a	Equipment with High-Tiered Engine Standards	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.10-1b	Idling Restrictions	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.10-1c	Construction Fugitive Dust Control Plan	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.10-1e	Off-site Mitigation Program	On-going	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals. <u><i>DD&A is coordinating with Monterey Bay Air Resources District ("MBARD") to document compliance with this mitigation measure. Additional information will be provided to ESA and CPUC when it becomes available.</i></u>
4.11-1	GHG Emissions Reductions Plan	N/A	This NTPR consists of preliminary site preparation activities, including implementation of mitigation requirements contained in the MPWSP EIR/EIS. Given the limited nature of this NTPR, this measure is not applicable at this stage. This measure will be addressed as part of future NTPR submittals. <u><i>DD&A will provide the GHG Emission Reduction Plan prior to construction of Phase 2 of the Desalination Plant.</i></u>

MM #	Condition Name	Status	Status Detail
4.12-1a	Neighborhood Notice and Construction Disturbance Coordination	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.12-1b	General Noise Controls for Construction Equipment	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.12-1c	Noise Control Plan for Nighttime Pipeline Construction	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.12-1e	Offsite Accommodations for Substantially Affected Nighttime Receptors.	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.12-3	Vibration Reduction Measures	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.12-5	Stationary Noise Controls	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.13-1a	Locate and Confirm Utility Lines	Scheduled	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.13-1b	Coordinate Final Construction Plans with Affected Utilities	Scheduled	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.13-1c	Safeguard Employees from Potential Accidents Related to Underground Utilities	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.13-1d	Emergency Response Plan	Complete	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.13-1e	Notify Local Fire Departments	Scheduled	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.13-1f	Ensure Prompt Reconnection of Utilities	On-going	<u>This mitigation measure is applicable to the Desalination Plant during construction. Please see Appendix A-2 for further discussion.</u>
4.13-2	Construction Waste Reduction and Recycling Plan	Scheduled	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.14-1	Maintain Clean and Orderly Construction Sites	On-going	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.14-2	Site-Specific Nighttime Lighting Measures	N/A	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.14-3a	Facility Design	N/A	<u>While the MMCRP applies Mitigation Measure 4.14-3a to the Desalination Plant, page 4.14-43 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant. Additionally, the scope of work associated with construction of Phase 1 does not include any above ground elements. Instead, this measure is applicable to the following components: Subsurface Slant Wells and the ASR Wells. Additionally, the EIR/EIS states that this measure could apply to other components, but would not be required to avoid a significant impact. As such, separate NTPR submittals for the components above will address this mitigation measure.</u>

MM #	Condition Name	Status	Status Detail
4.14-3b	Facility Screening	N/A	<u>While the MMCRP applies Mitigation Measure 4.14-3b to the Desalination Plant, page 4.14-43 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant. Additionally, the scope of work associated with construction of Phase 1 does not include any above ground elements. Instead, this measure is applicable to the ASR Wells. Additionally, the EIR/EIS states that this measure could apply to other components, but would not be required to avoid a significant impact. As such, the NTPR submittals for the ASR Wells will address this mitigation measure.</u>
4.15-2a	Establish Archaeologically Sensitive Areas	N/A	<u>While the MMCRP applies Mitigation Measure 4.15-2a to the Desalination Plant, page 4.15-47 of the EIR/EIS shows that this measure is not applicable to the Desalination Plant and is instead applicable to the Castroville Pipeline at Tembladero Slough and the Salinas River and the Source Water Pipeline in the Lapis Sand Mining Plant Historic District. As such, separate NTPR submittals for the components above will address this mitigation measure.</u>
4.15-2b	Inadvertent Discovery of Cultural Resources	On-going	<u>This mitigation measure is applicable to the Desalination Plant during pre-construction and construction activities. Please see Appendices A-1 and A-2 for further discussion.</u>
4.15-4	Inadvertent Discovery of Human Remains	On-going	<u>This mitigation measure is applicable to the Desalination Plant during construction activities. Please see Appendix A-2 for further discussion.</u>
4.16-1	Minimize Disturbance to Farmland	<u>On-going</u>	<u>While the MMCRP lists Mitigation Measure 4.16-1 as applying to the Desalination Plant, the EIR/EIS (p. 4.16-16) specifies that this measure does not apply to this component. Instead, it applies to the following components: Source Water Pipeline, New Desalinated Water Pipeline, and Castroville Pipeline. Separate NTPR submittals for these components will address this mitigation measure.</u> <u>However, DD&A included the notes from the Desalination Plant Construction Plans, which include the requirements of this mitigation measure, as Attachment 7 to this submittal.</u>
4.18-1	Construction Equipment and Vehicle Efficiency Plan	Complete	<u>This mitigation measure is applicable to the Desalination Plant during construction activities. Please see Appendix A-2 for further discussion.</u>