CALENDAR ITEM
C69

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W 27084
S 17 L. Pino

GENERAL LEASE – PUBLIC AGENCY USE

APPLICANT:
Monterey Regional Water Pollution Control Agency

PROPOSED LEASE:
AREA, LAND TYPE, AND LOCATION:
Sovereign land in the Salinas River, adjacent to 14811 Del Monte Boulevard, near Marina, Monterey County.

AUTHORIZED USE:
Installation, operation, and maintenance of an 18-inch-diameter High Density Polyethylene (HDPE) pipeline crossing under the Salinas River.

LEASE TERM:
25 years, beginning April 20, 2017.

CONSIDERATION:
The public health and safety; with the State reserving the right at any time to set a monetary rent if the Commission finds such action to be in the State's best interest.

SPECIFIC LEASE PROVISIONS:
1. **Pipeline Installation/Operation Safety Compliance:**
Lessee shall comply with all existing and subsequently enacted laws or regulations promulgated by the federal government, including, but not limited to the Department of Transportation or the National Transportation Safety Board, or any other governmental agency, whether federal, State or local, having lawful authority and jurisdiction over the Authorized Improvements.

2. **Mitigation Monitoring:**
Lessee agrees to be bound by and fully carry out, implement, and comply with all mitigation measures and reporting obligations identified as Lessee's, or Responsible Party's responsibility as set forth in the Mitigation Monitoring Program (MMP) attached hereto as Exhibit C and by this reference made a part of this Lease, or as modified by Lessor as permitted by law.

3. **Preservation of Public Access to Salinas River:**
Lessee shall not prohibit the public from accessing the Lease Premises for purposes of boating, fishing, hunting, swimming, or other recognized Public Trust uses providing such uses do not unreasonably interfere with the safe and lawful use of the Lease Premises.

STAFF ANALYSIS AND RECOMMENDATION:

Authority:

Public Resources Code sections 6005, 6216, 6301, 6501.1 and 6503; California Code of Regulations, title 2, section 2000, subdivision (b).

Public Trust and State's Best Interests Analysis:

The Monterey Regional Water Pollution Control Agency (Applicant) submitted an application for a General Lease – Public Agency Use, for the construction, use, and maintenance of an 18-inch-diameter segment of the Blanco Drain Diversion Pipeline (Pipeline) which crosses under the Salinas River (River). The Pipeline is part of the Applicant's larger proposed Pure Water Monterey Ground Water Replenishment Project (GWR Project), which proposes to inject recycled water into the groundwater aquifer to mitigate seawater intrusion of the municipal aquifers, and replenish groundwater supplies used for drinking and the irrigation of crops. The GWR Project would also reduce urban storm water "first flush" pollutant loads to the River and Monterey Bay, and reduce discharges of treated wastewater into Monterey Bay. Additionally, the GWR Project would facilitate a reduction in withdrawals of water from the Carmel River Alluvial Aquifer, increasing Carmel River flows, thereby reducing impacts to sensitive species, such as steelhead trout, California red-legged frog, and other aquatic species. Only the segment of the Pipeline that crosses under the River is subject to lease by the Commission.

The Applicant proposes to install the Pipeline to convey treated recycled water under the River. The Applicant proposes to use Horizontal Directional Drilling (HDD), a trenchless method, to install the Pipeline.

Trenchless construction will require work areas of approximately 40-feet by 60-feet on each side of the River to excavate the sending and receiving pits (pipeline excavation entrance and exit sites) needed to complete the connection under the River. The GWR Project Applicant's technical consultants and engineers have designed the location of these pits, and all other HDD construction and staging activities that might result in physical impacts, to avoid riparian habitat and vegetation associated with the River. The River is leveed at the proposed Project location; however, the GWR Project will not affect the leveed area along the River because the HDD excavation pits will be placed outside the leveed area in order to avoid changes in topography and riparian vegetation.

The area immediately adjacent to the drilling site is riparian, agricultural land that spreads out from the riparian corridor to the east and west. Once construction is complete, the Pipeline will not be visible, because the Pipeline and appurtenant facilities near and in the River will be underground. Additionally, any nuisance issues associated with the GWR Project will be minimal because the adjacent property is privately owned and is actively used for agricultural cultivation, and the GWR Project site is not accessible to the public or within any public view shed. Likewise, because the general public does not have access through the uplands to the proposed river crossing, any impact from the GWR Project on the public's right of access will also be minimal. Upon completion of construction, the proposed Pipeline will not change the surrounding land use in any way; however, HDD construction activities will result in temporary interruption of agricultural operations, including staging and laydown areas.

The exact construction time frame for installation of the proposed segment of the Pipeline under the River has not yet been decided. However, as part of the mitigation measures to avoid impact to the California red-legged frog, work activities will be completed between April 1 and November 1. The Applicant currently estimates that the HDD and Pipeline installation activities will take 2 to 3 weeks to complete. Most construction activities will be limited to daylight hours; however, HDD construction activities may require 24-hour operations during the drilling phase. The necessary right-of-way permissions have already been obtained from the private upland owners for the GWR Project, and equipment placement and staging will be contained within the upland parcels.

During the HDD phase of construction, the GWR Project will generate dust, which potentially could have an adverse impact on air quality; however, a Construction Fugitive Dust Control Plan will be implemented

during construction to help prevent potential nuisance issues or any adverse impacts to air quality as a result of the construction activities in the vicinity of the Project. Any solid or liquid waste generated by the HDD activities will be contained in the excavation pits at the entry and exit sites of the undercrossing and will be disposed of in accordance with the GWR Project's Construction Waste Reduction and Recycling Plan, which will identify the types of debris the GWR Project will generate and will describe the manner in which these waste streams would be handled to comply with State and local solid waste statutes and regulations. Once construction is completed the pipeline will not generate solid or liquid waste.

While the River at this location is navigable, motorized boat use in the River at this location is negligible; however, even if motorized traffic on the River were to increase, the Pipeline will not be subject to the effects of wave wash because it will be installed under the River. Furthermore, because the pipeline is under the River, the GWR Project will not impair or infringe upon the public right of navigation in the vicinity of the site.

The Applicant conducted a background search of the California Historical Resources Information System to insure that the proposed activities would not disrupt any significant archeological sites within the vicinity of the Project; the results identified no archeological sites within the vicinity of the directional drilling site. Additionally, the proposed site is not located within a designated scenic vista or scenic corridor as defined by the Monterey County General Plan. There are no known special-status plants at the drilling site; however, there are known occurrences of the California red-legged frog adjacent to the drilling site. Measures to mitigate against any impact to species within the river habitat adjacent to the site are provided in Exhibit C, Mitigation Monitoring Program.

The GWR Project is expected to benefit Public Trust resources by reducing storm water pollutant loads to the River and Monterey Bay and reducing discharges of treated wastewater into Monterey Bay. The lease is limited to a 25-year term and does not grant the lessee exclusive rights to the lease premises. Upon termination of the lease, lessee may be required to remove all improvements from State land. The proposed lease requires the lessee to indemnify the State for any liability incurred as a result of the lessee's activities thereon.

Climate Change:

Climate change impacts, including sea-level rise, are not limited to the open coast and may involve increased wave activity, storm events, and

flooding. The proposed installation of a force main pipeline under the River within the lease area is within a region identified as tidally influenced. By 2030, California's coast could see up to 1 foot of sea-level rise (from year 2000 levels), 2 feet by 2050, and possibly over 5 feet by 2100 (National Research Council 2012). This effect could increase the River's inundation levels within the lease area. In addition, as stated in *Safeguarding California* (California Natural Resources Agency 2014), climate change is projected to increase the frequency and severity of natural disasters related to flooding, drought, and storms (especially when coupled with sea-level rise).

The combination of these projected conditions could have the potential for more frequent and stronger storm events that may expose the lease area to higher flood risks and cause structures to be damaged or dislodged, presenting hazards to public safety, as well as dangers for navigation within the channel. Conversely, prolonged drought conditions could lower water levels exposing previously submerged structures to the elements.

As the proposed pipeline would be installed underneath the River using HDD, it is unlikely to be affected by flooding or drought conditions that may occur within the lease area under future projected scenarios of sea-level rise.

Conclusion:

For all the reasons above, Commission staff believes the issuance of this lease is consistent with the common law Public Trust Doctrine, will not substantially interfere with Public Trust needs at this location at this time and for the foreseeable term of the proposed lease, and is in the best interests of the State.

OTHER PERTINENT INFORMATION:

1. This action is consistent with Strategy 1.1 of the Commission's Strategic Plan to deliver the highest levels of public health and safety in the protection, preservation, and responsible economic use of the lands and resources under the Commission's jurisdiction.

2. An Environmental Impact Report (EIR), State Clearinghouse No. 2013051094, was prepared for this Project by the Monterey Regional Water Pollution Control Agency and certified on October 8, 2015. The California State Lands Commission staff has reviewed such document and Mitigation Monitoring Program prepared pursuant to the provisions of the California Environmental Quality Act (CEQA) (Pub. Resources Code, § 21081.6) and adopted by the lead agency.

Findings made in conformance with the State CEQA Guidelines (Cal. Code Regs., tit. 14, §§ 15091, 15096) are contained in Exhibit D, attached hereto.

3. This activity involves lands identified as possessing significant environmental values pursuant to Public Resources Code section 6370 et seq., but such activity will not affect those significant lands. Based upon staff's consultation with the persons nominating such lands and through the CEQA review process, it is staff's opinion that the Project, as proposed, is consistent with its use classification.

APPROVALS OBTAINED:

U.S. Army Corps of Engineers
National Marine Fisheries Service
U.S. Fish and Wildlife Service

FURTHER APPROVALS REQUIRED:

State Water Resources Control Board, Division of Water Rights
California Regional Water Quality Control Board
California Department of Fish and Wildlife
County Resource Management Agency
Monterey County Department of Environmental Health

EXHIBITS:

A. Land Description
B. Site and Location Map
C. Mitigation Monitoring Program
D. CEQA Findings

RECOMMENDED ACTION:

It is recommended that the Commission:

CEQA FINDING:

Find that an EIR, State Clearinghouse No. 2013051094, was prepared for this Project by the Monterey Regional Water Pollution Control Agency and certified on October 8, 2015, and that the Commission has reviewed and considered the information contained therein.

Adopt the Mitigation Monitoring Program, as contained in Exhibit C, attached hereto.

Adopt the Findings, made in conformance with California Code of Regulations, title 14, sections 15091 and 15096, subdivision (h), as contained in Exhibit D, attached hereto.

Determine that the Project, as approved, will not have a significant effect on the environment.

PUBLIC TRUST AND STATE'S BEST INTEREST:

Find that the issuance of this lease is consistent with the common law Public Trust Doctrine, will not substantially interfere with Public Trust needs at this location at this time and for the foreseeable term of the proposed lease, and is in the best interests of the State.

SIGNIFICANT LANDS INVENTORY FINDING:

Find that this activity is consistent with the use classification designated by the Commission for the land pursuant to Public Resources Code section 6370 et seq.

AUTHORIZATION:

Authorize issuance of a General lease – Public Agency Use to the Applicant beginning April 20, 2017, for a term of 25 years, for the construction, use, and maintenance of an 18-inch-diameter HDPE pipeline as described in Exhibit A and shown on Exhibit B (for reference purposes only) attached and by this reference made a part hereof; consideration being the public's health and safety; with the State reserving the right at any time to set a monetary rent if the Commission finds such action to be in the State's best interest.

EXHIBIT A
LAND DESCRIPTION

W27084

A 20.00 foot wide strip of tide and submerged land lying within the bed of the Salinas River, situate in the County of Monterey, State of California, the centerline of said strip is described as follows:

BEGINNING at a point on the southeasterly line of Parcel C as shown and designated on that map filed in Volume 19 of Surveys, at Page 103, Official Records of said County, said point of beginning being distant South 44° 28' 55" West, 736.64 feet from the most easterly corner of said Parcel C, thence departing said southeasterly line along the centerline of said 20.00' wide strip of land

1) South 45° 14' 25" East, 57.96 feet; thence
2) Southeasterly 83.01 feet along the arc of a tangent curve to the right having a radius of 797.00 feet, through a central angle of 5° 58' 03"; thence
3) South 39° 16' 22" East, 56.75 feet; thence
4) South 40°26'28" East, 32.69 feet; thence
5) South 41° 36' 35" East, 174.64 feet; thence
6) Southeasterly 132.96 feet along the arc of a tangent curve to the left having a radius of 803.00 feet, through a central angle of 9° 29' 14"; thence
7) South 51° 05' 48" East, 196.20 feet; thence
8) Southeasterly 79.32 feet along the arc of a tangent curve to the left having a radius of 803.00 feet, through a central angle of 5° 39' 36"; thence
9) South 56° 45' 24" East, 111.78 feet; thence
10) South 45° 30' 24" East, 18.17 feet; thence
11) North 44° 29' 36" East, 463.10 feet to the **TERMINUS** of said strip.

The sidelines of said strip are to be extended or shortened so as to begin and terminate on the southeasterly line of said Parcel "C" and the southerly line of that parcel described in Document 2015-039394 Official Records of said County, respectively.

EXCEPTING THEREFROM any portion of the above described strip of land lying landward of the ordinary high water marks of the left and right banks of the Salinas River

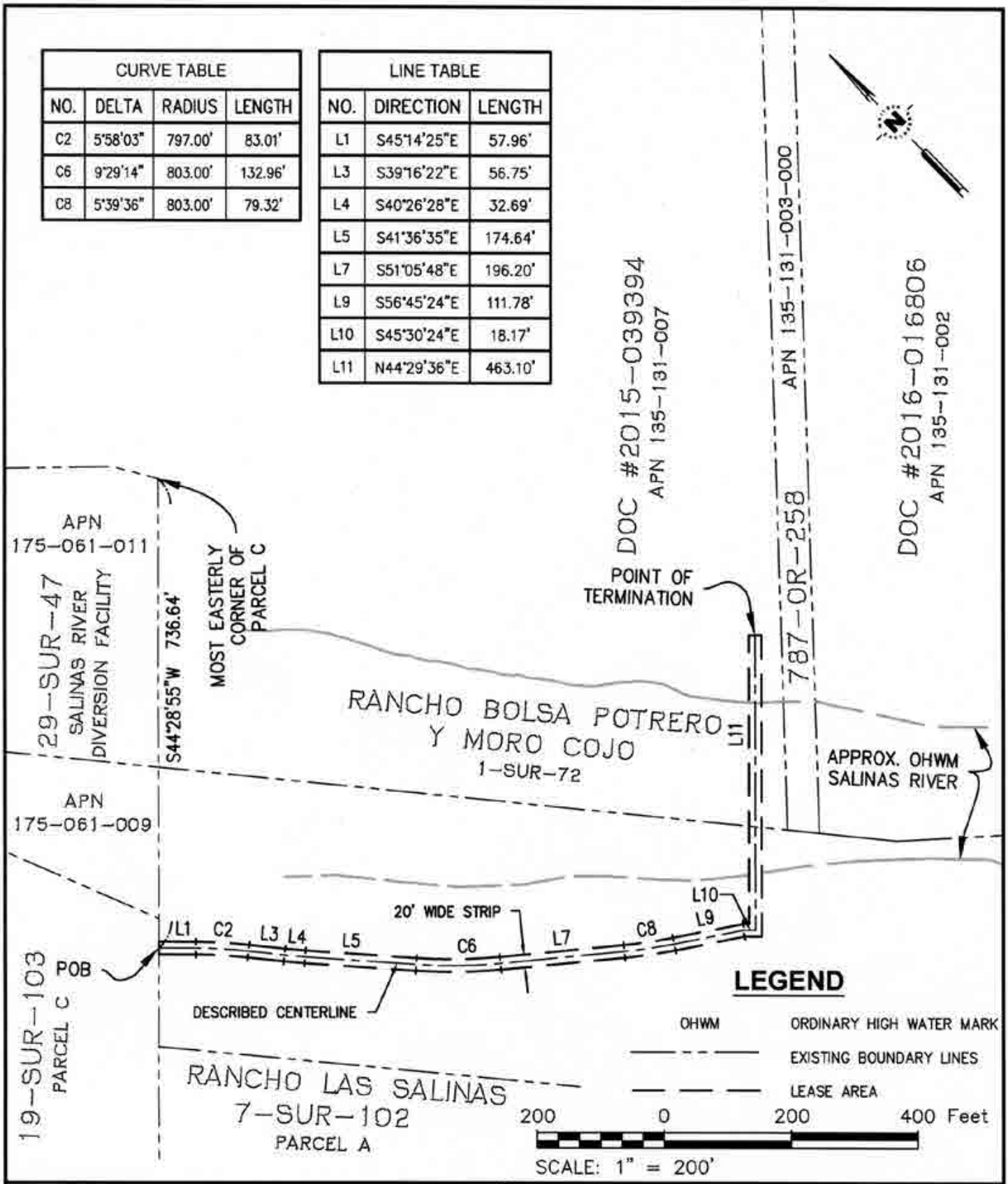
END OF DESCRIPTION

PREPARED BY:
WHITSON ENGINEERS

RICHARD P. WEBER P.L.S.
L.S. NO. 8002
Job No.: 1906.31

CURVE TABLE			
NO.	DELTA	RADIUS	LENGTH
C2	5°58'03"	797.00'	83.01'
C6	9°29'14"	803.00'	132.96'
C8	5°39'36"	803.00'	79.32'

LINE TABLE		
NO.	DIRECTION	LENGTH
L1	S45°14'25"E	57.96'
L3	S39°16'22"E	56.75'
L4	S40°26'28"E	32.69'
L5	S41°36'35"E	174.64'
L7	S51°05'48"E	196.20'
L9	S56°45'24"E	111.78'
L10	S45°30'24"E	18.17'
L11	N44°29'36"E	463.10'



LAND DESCRIPTION
LEASE AREA

PAGE 2 OF 2

MONTEREY COUNTY, CALIFORNIA
MARCH 13, 2017

WHITSON ENGINEERS
2425 Porter Street • Suite 2 • Soquel, CA 95073
831 464-9363 • Fax 831 464-2316
CIVIL ENGINEERING • LAND SURVEYING • PROJECT MANAGEMENT

NO SCALE

SITE

CURVE TABLE			
NO.	DELTA	RADIUS	LENGTH
C2	5°58'03"	797.00'	83.01'
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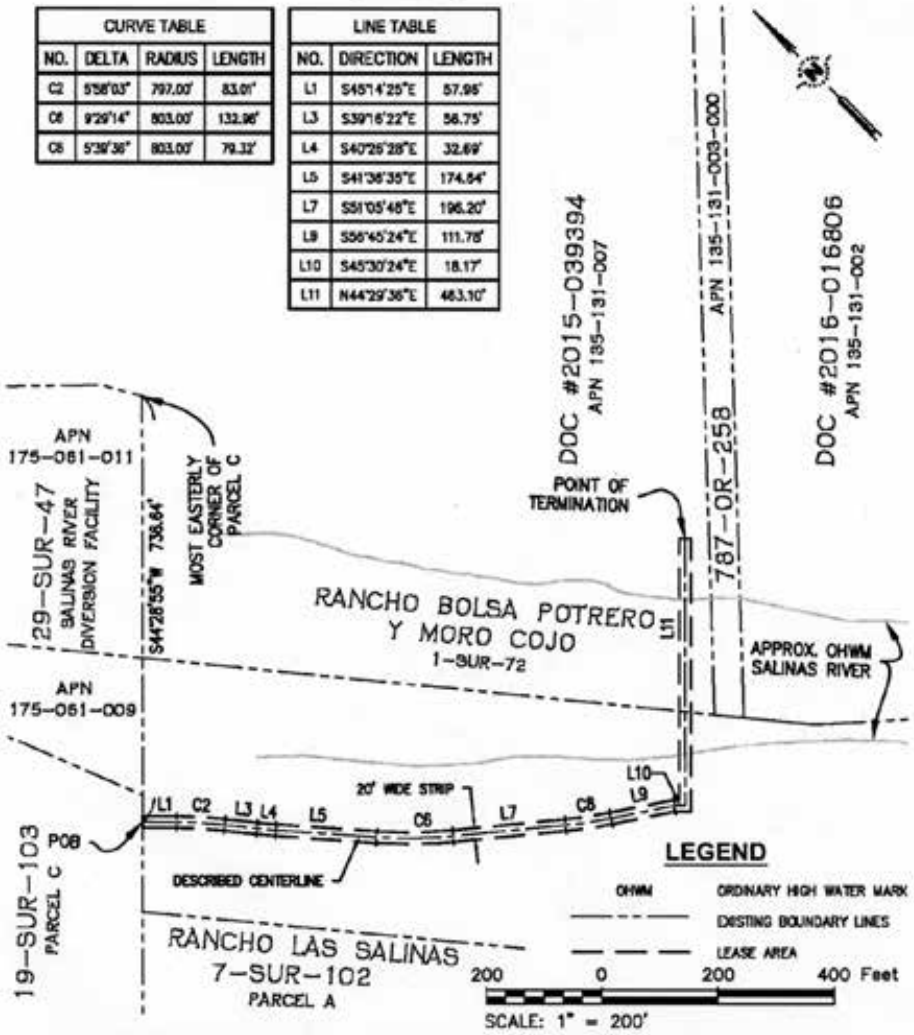

ADJACENT TO 14811 DEL MONTE BLVD, MARINA

NO SCALE

LOCATION

MAP SOURCE: USGS QUAD

This Exhibit is solely for purposes of generally defining the lease premises, is based on unverified information provided by the Lessee or other parties and is not intended to be, nor shall it be construed as, a waiver or limitation of any State interest in the subject or any other property.

Exhibit B

W27084
MONTEREY REGIONAL WATER POLLUTION CONTROL AGENCY
APN 135-131-007, 175-011-012, 013
GENERAL LEASE - PUBLIC AGENCY USE
MONTEREY COUNTY

JAK 3/17

EXHIBIT C
CALIFORNIA STATE LANDS COMMISSION
MITIGATION MONITORING PROGRAM

PURE WATER MONTEREY/GROUNDWATER REPLENISHMENT PROJECT
(W27084, State Clearinghouse No. 2013051094)

The California State Lands Commission (Commission) is a responsible agency under the California Environmental Quality Act (CEQA) for the Pure Water Monterey/ Groundwater Replenishment Project (Project). The CEQA lead agency for the Project is the Monterey Regional Water Pollution Control Agency.

In conjunction with approval of this Project, the Commission adopts this Mitigation Monitoring Program (MMP) for the implementation of mitigation measures for the portion(s) of the Project located on Commission lands. The purpose of a MMP is to discuss feasible measures to avoid or substantially reduce the significant environmental impacts from a project identified in an Environmental Impact Report (EIR) or a Mitigated Negative Declaration (MND). State CEQA Guidelines section 15097, subdivision (a), states in part:[1]

> *In order to ensure that the mitigation measures and project revisions identified in the EIR or negative declaration are implemented, the public agency shall adopt a program for monitoring or reporting on the revisions which it has required in the project and the measures it has imposed to mitigate or avoid significant environmental effects. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation; however, until mitigation measures have been completed the lead agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.*

The lead agency has certified an EIR; State Clearinghouse No. 2013051094, and adopted a MMP for the whole of the Project (see Exhibit C, Attachment C-1) and remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with its program. The Commission's action and authority as a responsible agency apply only to the mitigation measures listed in Table C-1 below. The full text of each mitigation measure, as set forth in the MMP prepared by the CEQA lead agency and listed in Table C-1, is incorporated by reference in this Exhibit C. Any mitigation measures adopted by the Commission that differ substantially from those adopted by the lead agency are shown as follows:

- Additions to the text of the mitigation measure are <u>underlined</u>; and
- Deletions of the text of the mitigation measure are shown as ~~strikeout~~ or as otherwise noted.

[1] The State CEQA Guidelines are found at California Code of Regulations, title 14, section 15000 et seq.

Table C-1. Project Impacts and Applicable Mitigation Measures

Potential Impact	Mitigation Measure (MM)[2]	Difference Between CSLC MMP and Lead Agency MMP
AQ-1. Construction Criteria Pollutant Emissions.	AQ-1	None
AQ-C. Cumulative Impacts to Marine Water Quality.	AQ-1	None
BF-1. Habitat Modification Due to Construction of Diversion Facilities.	BF-1a	None
BT-1. Construction Impacts to Special-Status Species and Habitat.	BT-1a; BT-1b; BT-1c; BT-1h; BT-1i; BT-1k; BT-1p; BT-1q	None
BT-2. Construction Impacts to Sensitive Habitats.	BT-2a; BT-2c	None
CR-2. Construction Impacts on Archaeological Resources or Human Remains.	CR-2b; CR-2C	CR-2b (see below)
EN-1. Construction Impacts due to Temporary Energy Use.	EN-1	None
HS-C. Cumulative Impacts to Marine Surface Waters.	HS-C	None
MR-C. Cumulative Impacts to Marine Biological Resources.	MR-C	None
NV-2. Construction Noise That Exceeds or Violate Local Standards.	NV-2a	None
PS-3. Construction Solid Waste Policies and Regulations.	PS-3	None

Mitigation Measure CR-2b: Discovery of Archaeological Resources or Human Remains. If archaeological resources or human remains are unexpectedly discovered during any construction, work shall be halted within 50 meters (±160 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented. The County Coroner shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are determined to be of Native American origin.

Commission staff shall be notified of any significant cultural resources or paleontological specimens discovered on lands under the jurisdiction of the Commission. The final disposition of archaeological and historical resources and paleontological specimens from such lands must be approved by the Commission.

If the human remains are Native American and are found on lands under the jurisdiction of the Commission, Commission staff shall also be notified to address any landowner responsibilities.

[2] See Attachment C-1 for the full text of each MM taken from the MMP prepared by the CEQA lead agency.

ATTACHMENT C-1

Mitigation Monitoring Program Adopted by the

Monterey Regional Water Pollution Control Agency

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
Impact AE-2: Construction Impacts due to Temporary Light and Glare	**Mitigation Measure AE-2**: **Minimize Construction Nighttime Lighting**. As part of its contract specifications, MRWPCA shall require its construction contractors to implement site-specific nighttime construction lighting measures for nighttime construction at the proposed Injection Well Facilities site and for the CalAm Distribution System: Alternative Monterey Pipeline. The measures shall, at a minimum, require that lighting be shielded, directed downward onto work areas to minimize light spillover, and specify that construction lighting use the minimum wattage necessary to provide safety at the construction sites. MRWPCA shall ensure these measures are implemented at all times during nighttime construction at the Injection Well Facilities site and for the CalAm Distribution System: Alternative Monterey Pipeline and for the duration of all required nighttime construction activity at these locations.	Injection Well Facilities Site and CalAm Distribution System: Alternative Monterey Pipeline	In contract specifications and during project construction	MRWPCA, CalAm, construction contractors	During project construction	MRWPCA and CalAm
Impact AE-3: Degradation of Visual Quality of Sites and Surrounding Areas	**Mitigation Measure AE-3: Provide Aesthetic Screening for New Above-Ground Structures.** Proposed above-ground features at the Booster Pump Station and Injection Well Facilities (at a minimum, at the well clusters and back-flush basin), shall be designed to minimize visual impacts by incorporating screening with vegetation, or other aesthetic design treatments, subject to review and approval of the City of Seaside which has also requested that the buildings be designed with Monterey/Mission style architecture to match the design of the structures that have been built on the Santa Margarita ASR site and the Seaside Middle School ASR Site. All pipelines placed within the City of Seaside on General Jim Moore Boulevard shall be placed underground. MRWPCA shall coordinate with the City of Seaside on the location of injection wells and booster pumps in order to reduce conflicts with future commercial/residential development opportunities. Screening and aesthetic design treatments at the RUWAP Booster Pump Station component shall be subject to review and approval by the City of Marina. Use of standard, commercial-grade, chain link fencing and barbed wire should be discouraged.	RUWAP Booster Pump Station and Injection Well Facilities	Prior to City of Seaside and City of Marina issuance of grading, easements/ ROW permits	MRWPCA project engineers and contractors	During project construction	MRWPCA; Cities of Seaside and Marina (public works directors)
Impact AE-4: Impacts due to Permanent Light and Glare during Operations	**Mitigation Measure AE-4**: **Exterior Lighting Minimization.** To prevent exterior lighting from affecting nighttime views, the design and operation of lighting at the RUWAP Product Water Conveyance Booster Pump Station and Injection Well Facilities, shall adhere to the following requirements: • Use of low-intensity street lighting and low-intensity exterior lighting shall be required. No floodlights shall be allowed at night within the City of Marina. • Lighting fixtures shall be cast downward and shielded to prevent light from spilling onto adjacent offsite uses. • Lighting fixtures shall be designed and placed to minimize glare that could affect users of adjacent properties, buildings, and roadways. • Fixtures and standards shall conform to state and local safety and illumination requirements.	RUWAP Booster Pump Station and Injection Well Facilities	Prior to City of Seaside and Marina issuance of grading and easements/ ROW permits	MRWPCA project engineers and contractors	During project operation	MRWPCA; Cities of Seaside and Marina (public works directors)
Impact AQ-1: Construction Criteria Pollutant Emissions	**Mitigation Measure AQ-1**: **Construction Fugitive Dust Control Plan.** The following standard Dust Control Measures shall be implemented during construction to help prevent potential nuisances to nearby receptors due to fugitive dust and to reduce contributions to exceedances of the state ambient air quality standards for PM_{10}, in accordance with MBUAPCD's CEQA Guidelines. • Water all active construction areas as required with non-potable sources to the extent feasible; frequency should be based on the type of operation, soil, and wind exposure and minimized to prevent wasteful use of water. • Prohibit grading activities during periods of high wind (over 15 mph). • Cover all trucks hauling soil, sand, and other loose materials and require trucks to maintain at least 2 feet of freeboard. • Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites. • Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets. • Enclose, cover, or water daily exposed stockpiles (dirt, sand, etc.). • Replant vegetation in disturbed areas as quickly as possible.	All components	During project construction	MRWPCA, CalAm project engineers and contractors	During project construction	MRWPCA, CalAm, and MBUAPCD

[1] CalAm Distribution System: Alternative Monterey Pipelines and the associated mitigation measures would be the responsibility of CalAm to implement and the local jurisdictions and/or the California Public Utilities Commission to monitor.

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	• Wheel washers shall be installed and used by truck operators at the exits of the construction sites to the AWT Facility site, the Injection Well Facilities, and the Booster Pump Station. • Post a publicly visible sign that specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints and take corrective action within 48 hours. The phone number of the MBUAPCD shall also be visible to ensure compliance with MBUAPCD rules.					
Impact BF-1: Habitat Modification Due to Construction of Diversion Facilities	**Mitigation Measure BF-1a**: **Construction during Low Flow Season**. Implement Mitigation Measure BT-1a.Conduct construction of diversion facilities, including the directional drilling under the Salinas River, during periods of low flow outside of the SCCC steelhead migration periods, i.e. between June and November, which would be outside of the adult migration period from December through April and outside of the smolt migration period from March through May.	Reclamation Ditch, Tembladero Slough, and Blanco Drain Diversions	Prior to commencing construction	MRWPCA engineers and contractors	During construction	MRWPCA
	Mitigation Measure BF-1b: Relocation of Aquatic Species during Construction. Conduct pre-construction surveys to determine whether tidewater gobies or other fish species are present, and if so, implement appropriate measures in consultation with applicable regulatory agencies, which may include a program for capture and relocation of tidewater gobies to suitable habitat outside of work area during construction. Pre-construction surveys shall be consistent with requirements and approved protocols of applicable resource agencies and performed by a qualified fisheries biologist.	Reclamation Ditch and Tembladero Slough Diversions	Prior to project construction	Qualified biologists	Prior to construction	MRWPCA
	Mitigation Measure BF-1c: Tidewater Goby and Steelhead Impact Avoidance and Minimization. To ensure compliance with the federal Endangered Species Act (FESA) and the California Endangered Species Act (CESA), consultation with NFMS/NOAA, USFWS, and CDFW shall be conducted as required, and any necessary take permits or authorizations would be obtained. If suitable habitat for tidewater goby (Tembladero Slough) and steelhead cannot be avoided, any in-stream portions of each project component (where the Project improvements require in-stream work) shall be dewatered/ diverted. A dewatering/diversion plan shall be prepared and submitted to NMFS, USFWS, and CDFW for review and approval. Specific plan elements are noted below and will be refined through consultation with USFWS, NMFS and CDFW: • Required Pre-Construction surveys identified in Mitigation Measure BF-1b shall be consistent with requirements and approved protocol of applicable resource agencies and performed by a qualified fisheries biologist. • All dewatering/diversion activities shall be monitored by a qualified fisheries biologist. The fisheries biologist shall be responsible for capture and relocation of fish species out of the work area during dewatering/diversion installation. • The project proponents shall designate a qualified representative to monitor on-site compliance of all avoidance and minimization measures. The fisheries biologist shall have the authority to halt any action which may result in the take of listed species. • Only USFWS/NMFS/CDFW-approved biologists shall participate in the capture and handling of listed species subject to the conditions in the Incidental Take Permits as noted above. • No equipment shall be permitted to enter wetted portions of any affected drainage channel. All equipment operating within streams shall be in good conditions and free of leaks. • Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access. • Work within and adjacent to streams shall not occur between November 1 and June 1 unless otherwise approved by NMFS and the CDFW. • If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline. If water is to be pumped around work sites, intakes shall be completely screen with wire mesh not larger than five millimeters to prevent animals from entering the pump system. • If any tidewater goby or steelhead are harmed during implementation of the project, the project biologist shall document the circumstances that led to harm and shall determine if project activities should cease or be altered in an effort to avoid further harm to	Reclamation Ditch and Tembladero Slough Diversions	Prior to project construction	MRWPCA Qualified biologists	During construction	MRWPCA, NMFS/NOAA, USFWS, CDFW

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	the species. • Water turbidity shall be monitored by a qualified biologist or water quality specialist during all instream work. Water turbidity shall be tested daily at both an upstream location for baseline measurement and downstream to determine if project activities are altering water turbidity. Turbidity measures shall be taken within 50 feet of construction activities to rule out other outside influences. Additional turbidity testing shall occur if visual monitoring indicates an increased in turbidity downstream of the work area. If turbidity levels immediately downstream of the project rise to more than 20 NTUs (Nephelometric Turbidity Units) above the upstream (baseline) turbidity levels, all construction shall be halted and all erosion and sediment control devices shall be thoroughly inspected for proper function, or shall be replaced with new devices to prevent additional sediment discharge into streams. The above mitigation is subject to review and approval for CESA and FESA requirements by approving agencies as identified above and may be modified to further reduce, avoid or minimize impacts to species.					
Impact BF-2: Interference with Fish Migration	**Mitigation Measure BF-2a: Maintain Migration Flows.** Implement BF-1a, BF-1b, and BF-1c. Operate diversions to maintain steelhead migration flows in the Reclamation Ditch based on two criteria – one for upstream adult passage in Jan-Feb-Mar and one for downstream juvenile passage in Apr-May. For juvenile passage, the downstream passage shall have a flow trigger in both Gabilan Creek and at the Reclamation Ditch, so that if there is flow in Gabilan Creek that would allow outmigration, then the bypass flow requirements, as measured at the San Jon Gage of the Reclamation Ditch, shall be applied (see Hagar Environmental Science, *Estimation of Minimum Flows for Migration of Steelhead in the Reclamation Ditch*, February 27, 2015, in Appendix G-2, of the Draft EIR and Schaaf & Wheeler, *Fish Passage Analysis: Reclamation Ditch at San Jon Rd. and Gabilan Creek at Laurel Rd.* July 15, 2015 in Appendix CC of this Final EIR). If there is no flow in Gabilan Creek, then only the low flow (minimum bypass flow requirement as proposed in the project description) shall be applied, and these flows for the dry season at Reclamation Ditch as measured at the San Jon USGS gage shall be met. *Note: If there is no flow gage in Gabilan Creek, then downstream passage flow trigger shall be managed based on San Jon Road gage and flows.* *Alternately, as the San Jon weir located at the USGS gage is considered a barrier to steelhead migration and the bypass flow requirements have been developed to allow adult and smolt steelhead migration to have adequate flow to travel past this obstacle, if the weir were to be modified to allow steelhead passage, the mitigation above would not have to be met. Therefore, alternate Mitigation Measure BF-2a has been developed, as follows:* **Mitigation Measure Alternate BF-2a**: **Modify San Jon Weir.** Construct modifications to the existing San Jon weir to provide for steelhead passage. Modifications could include downstream pool, modifications to the structural configuration of the weir to allow passage or other construction, and improvements to remove the impediment to steelhead passage defined above. The above mitigation is subject to compliance with CESA and FESA and appropriate approving agencies may modify the above mitigation to further reduce, avoid, or minimize impacts to species.	Reclamation Ditch Diversion	During project operations	MRWPCA	During project operations	MRWPCA, NMFS/NOAA, USFWS, CDFW
		Reclamation Ditch Diversion	Prior to project operations	Project engineers, construction contractors	Prior to project operations	MRWPCA, NMFS/NOAA, USFWS, CDFW
Impact BT-1: Construction Impacts to Special-Status Species and Habitat	**Mitigation Measure BT-1a: Implement Construction Best Management Practices**. The following best management practices shall be implemented during all identified phases of construction (i.e., pre-, during, and post-) to reduce impacts to special-status plant and wildlife species: 1. A qualified biologist must conduct an Employee Education Program for the construction crew prior to any construction activities. A qualified biologist must meet with the construction crew at the onset of construction at the site to educate the construction crew on the following: 1) the appropriate access route(s) in and out of the construction area and review project boundaries; 2) how a biological monitor will examine the area and agree upon a method which would ensure the safety of the monitor during such activities, 3) the special-status species that may be present; 4) the specific mitigation measures that will be incorporated into the construction effort; 5) the general provisions and protections afforded by the USFWS and CDFW; and 6) the proper procedures if a special-status species is encountered within the site. 2. Trees and vegetation not planned for removal or trimming shall be protected prior to and during construction to the maximum extent possible through the use of exclusionary fencing, such as hay bales for herbaceous and shrubby vegetation, and protective wood barriers for trees. Only certified weed-free straw shall be used, to avoid the introduction of non-native, invasive species. A biological monitor shall supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the	All components	Prior to, during and after project construction	MRWPCA, CalAm, construction contractors and qualified biologist	Prior to and during project construction	MRWPCA, CalAm, qualified biologist and construction biological monitor; City of Seaside for Injection Well Facilities

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	protective fencing remains intact. 3. Protective fencing shall be placed prior to and during construction to keep construction equipment and personnel from impacting vegetation outside of work limits. A biological monitor shall supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact. 4. Following construction, disturbed areas shall be restored to pre-construction contours to the maximum extent possible and revegetated using locally-occurring native species and native erosion control seed mix, per the recommendations of a qualified biologist. 5. Grading, excavating, and other activities that involve substantial soil disturbance shall be planned and carried out in consultation with a qualified hydrologist, engineer, or erosion control specialist, and shall utilize standard erosion control techniques to minimize erosion and sedimentation to native vegetation (pre-, during, and post-construction). 6. No firearms shall be allowed on the construction sites at any time. 7. All food-related and other trash shall be disposed of in closed containers and removed from the project area at least once a week during the construction period, or more often if trash is attracting avian or mammalian predators. Construction personnel shall not feed or otherwise attract wildlife to the area. 8. To protect against spills and fluids leaking from equipment, the project proponent shall require that the construction contractor maintains an on-site spill plan and on-site spill containment measures that can be easily accessed. 9. Refueling or maintaining vehicles and equipment should only occur within a specified staging area that is at least 100 feet from a waterbody (including riparian and wetland habitat) and that has sufficient management measures that will prevent fluids or other construction materials including water from being transported into waters of the state. Measures shall include confined concrete washout areas, straw wattles placed around stockpiled materials and plastic sheets to cover materials from becoming airborne or otherwise transported due to wind or rain into surface waters. 10. The project proponent and/or its contractors shall coordinate with the City of Seaside on the location of Injection Well Facilities and the removal of sensitive biotic material.					
Impact BT-1: Construction Impacts to Special-Status Species and Habitat (continued)	**Mitigation Measure BT-1b: Implement Construction-Phase Monitoring.** The project proponents shall retain a qualified biologist to monitor all ground disturbing construction activities (i.e., vegetation removal, grading, excavation, or similar activities) to protect any special-status species encountered. Any handling and relocation protocols of special-status wildlife species shall be determined in coordination with CDFW prior to any ground disturbing activities, and conducted by a qualified biologist with appropriate scientific collection permit. After ground disturbing project activities are complete, the qualified biologist shall train an individual from the construction crew to act as the on-site construction biological monitor. The construction biological monitor shall be the contact for any special-status wildlife species encounters, shall conduct daily inspections of equipment and materials stored on site and any holes or trenches prior to the commencement of work, and shall ensure that all installed fencing stays in place throughout the construction period. The qualified biologist shall then conduct regular scheduled and unscheduled visits to ensure the construction biological monitor is satisfactorily implementing all appropriate mitigation protocols. Both the qualified biologist and the construction biological monitor shall have the authority to stop and/or redirect project activities to ensure protection of resources and compliance with all environmental permits and conditions of the project. The qualified biologist and the construction monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the project. The log shall also include any special-status wildlife species observed and relocated.	Salinas Pump Station, Salinas Treatment Facility, Blanco Drain Diversion, Product Water Conveyance: RUWAP Alignment (Pipeline and Booster Pump Station) and Injection Well Facilities	Prior to and during project construction	MRWPCA, qualified biologists	Prior to and during project construction	MRWPCA qualified biologist and construction biological monitor; CDFW
	Mitigation Measure BT-1c: Implement Non-Native, Invasive Species Controls. The following measures shall be implemented to reduce the introduction and spread of non-native, invasive species: 1. Any landscaping or replanting required for the project shall not use species listed as noxious by the California Department of Food and Agriculture (CDFA). 2. Bare and disturbed soil shall be landscaped with CDFA recommended seed mix or plantings from locally adopted species to preclude the invasion on noxious weeds in the Project Study Area. 3. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds, before mobilizing to arrive at the construction site and before leaving the construction site.	All except Alternative Monterey Pipeline	During project construction	Construction contactors	During project construction	MRWPCA qualified biologist and construction biological monitor

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	4. All non-native, invasive plant species shall be removed from disturbed areas prior to replanting.					
Impact BT-1: Construction Impacts to Special-Status Species and Habitat (continued)	**Mitigation Measure BT-1d: Conduct Pre-Construction Surveys for California Legless Lizard.** The project proponents shall retain a qualified biologist to prepare and implement a legless lizard management plan in coordination with CDFW, which shall include, but is not limited to, the protocols for pre-construction surveys, construction monitoring, and salvage and relocation. The management plan shall include, but is not limited to, the following: • Pre-Construction Surveys. Pre-construction surveys for legless lizards shall be conducted in all suitable habitat proposed for construction, ground disturbance, or staging. The qualified biologist shall hold or obtain a CDFW scientific collection permit for this species. The pre-construction surveys shall use a method called "high-grading." The high grading method shall include surveying the habitat where legless lizards are most likely to be found, and the survey must occur under the conditions when legless lizards are most likely to be seen and captured (early morning, high soil moisture, overcast, etc.). The intensity of a continued search may then be adjusted, based on the results of the first survey in the best habitat. A "three pass method" shall be used to locate and remove as many legless lizards as possible. A first pass shall locate as many legless lizards as possible, a second pass should locate fewer lizards than the first pass, and a third pass should locate fewer lizards than the second pass. All search passes shall be conducted in the early morning when legless lizards are easiest to capture. Vegetation may be removed by hand to facilitate hand raking and search efforts for legless lizards in the soil under brush. If lizards are found during the first pass, an overnight period of no soil disturbance must occur before the second pass, and the same requirement shall be implemented after the second pass. If no lizards are found during the second pass, a third pass is not required. Installation of a barrier, in accordance with the three pass method, shall be required if legless lizards are found at the limits of construction (project boundaries) and sufficient soft sand and vegetative cover are present to suspect additional lizards are in the immediate vicinity on the adjacent property. A barrier shall prevent movement of legless lizards into the property. All lizards discovered shall be handled according to the salvage procedures outlined below. • Construction Monitoring. Monitoring by a qualified biologist shall be ongoing during construction. The onsite monitor shall be present during all ground disturbing construction activities. To facilitate the careful search for lizards during construction, vegetation may need to be removed. If removal by hand is impractical, equipment such as a chainsaw, string trimmer, or skid-steer may be used, if a monitor and crew are present. The task of the vegetation removal is to remove plants under the direction of the monitor, allowing the monitor to watch for legless lizards. After plants are removed, the monitor and crew shall search the exposed area for legless lizards. If legless lizards are found during preconstruction surveys or construction monitoring, the protocols for salvage and relocation identified below shall be followed. Upon completion of pre-construction surveys, construction monitoring, and any resulting salvage and relocation actions, a report shall be submitted to the CDFW. The CDFW must be notified at least 48 hours before any field activity begins. • Salvage and Relocation. Only experienced persons may capture or handle legless lizards. The monitor must demonstrate a basic understanding, knowledge, skill, and experience with this species and its habitat. Once captured, a lizard shall be placed in a lidded, vented box containing clean sand. Areas of moist and dry sand need to be present in the box. The boxes must be kept out of direct sunlight and protected from temperatures over 72°F. The sand must be kept at temperatures under 66°F. Ideal temperatures are closer to 60°F. On the same day as capture, the lizards shall be examined for injury and data recorded on location where found as well as length, color, age, and tail condition. Once data is recorded, lizards shall be relocated to appropriate habitat, as determined through coordination with the CDFW, qualified biologist, and potential landowners. Suitability of habitat for lizard release must be evaluated and presented in a management plan. The habitat must contain habitat factors most important to the health and survival of the species such as appropriate habitat based on soils, vegetated cover, native plant species providing cover, plant litter layer and depth, soil and ambient temperature, quality and composition of invertebrate population and prey availability. Potential relocation sites that contain the necessary conditions may exist within the habitat reserves on the former Fort Ord, including the Fort Ord National Monument. Lizards shall be marked with a unique tag (pit or tattoo) prior to release. Release for every lizard shall be recorded with GPS. GPS locations shall be submitted as part of the survey result report to document the number and locations of lizards relocated.	Product Water Conveyance: RUWAP Alignment (Pipeline and Booster Pump Station) and Injection Well Facilities	Prior to and during project construction	MRWPCA, qualified biologist	Prior to and during project construction	MRWPCA, qualified biologist

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	Mitigation Measure BT-1e: Prepare and Implement Rare Plant Restoration Plan to Mitigate Impacts to Sandmat Manzanita, Monterey Ceanothus, Monterey Spineflower, Eastwood's Goldenbush, Coast Wallflower, and Kellogg's Horkelia. Impacts to rare plant species individuals shall be avoided through project design and modification, to the extent feasible while taking into consideration other site and engineering constraints. If avoidance is not possible, the species shall be replaced at a 1:1 ratio for area of impact through preservation, restoration, or combination of both. A Rare Plant Restoration Plan, approved by the lead agency prior to commencing construction on the component site upon which the rare plant species would be impacted, shall be prepared and implemented by a qualified biologist. The plan shall include, but is not limited to, the following: a. A detailed description of on-site and/or off-site mitigation areas, salvage of seed and/or soil bank, plant salvage, seeding and planting specifications, including, if appropriate, increased planting ratio to ensure the applicable success ratio. Specifically, seed shall be collected from the on-site individuals that would be impacted and grown in a local greenhouse, and then transplanted within the mitigation area. Plants shall be transplanted while they are young seedlings in order to develop a good root system. Alternatively, the mitigation area may be broadcast seeded in fall; however, if this method is used, some seed shall be retained in the event that the seeding fails to produce viable plants and contingency measures need to be employed. b. A description of a 3-year monitoring program, including specific methods of vegetation monitoring, data collection and analysis, restoration goals and objectives, success criteria, adaptive management if the criteria are not met, reporting protocols, and a funding mechanism. The mitigation area shall be preserved in perpetuity through a conservation easement or other legally enforceable land preservation agreement. Exclusionary fencing shall be installed around the mitigation area to prevent disturbance until success criteria have been met.	RUWAP Pipeline Alignment, and , Injection Well Facilities,; does not apply to HMP species within the former Fort Ord.	Prior to project construction	Project engineers, project biologist, MRWPCA	For 3 years upon completion of construction	MRWPCA qualified biologist
Impact BT-1: Construction Impacts to Special-Status Species and Habitat (continued)	**Mitigation Measure BT-1f: Conduct Pre-Construction Protocol-Level Botanical Surveys within the remaining portion of the Project Study Area within the Injection Well Facilities site.** The project proponents shall retain a qualified biologist to conduct protocol-level surveys for special-status plant species within the Injection Well Facilities site not yet surveyed. Protocol-level surveys shall be conducted by a qualified biologist at the appropriate time of year for species with the potential to occur within the site. A report describing the results of the surveys shall be provided to the project proponents prior to any ground disturbing activities. The report shall include, but is not limited to: 1) a description of the species observed, if any; 2) map of the location, if observed; and 3) recommended avoidance and minimization measures, if applicable. The avoidance and minimization measures shall include, but are not limited to, the following: • Impacts to species individuals shall be avoided through project design and modification, to the extent feasible while taking into consideration other site and engineering constraints. • If impacts to State listed plant species cannot be avoided, the project proponents shall comply with the CESA and consult with the CDFW to determine whether authorization for the incidental take of the species is required prior to commencing construction. If it is determined that authorization for incidental take is required from the CDFW, the project proponents shall comply with the CESA to obtain an incidental take permit prior to commencing construction on the site upon which state listed plant species could be taken. Permit requirements typically involve preparation and implementation of a mitigation plan and mitigating impacted habitat at a 3:1 ratio through preservation and/or restoration. At a minimum, the impacted plant species shall be replaced at a 1:1 ratio through preservation and/or restoration, as described below. The project proponents shall retain a qualified biologist to prepare a mitigation plan, which shall include, but is not limited to identifying: avoidance and minimization measures; mitigation strategy, including a take assessment, avoidance and minimization measures, compensatory mitigation lands, and success criteria; and funding assurances. The project proponents shall be required to implement the approved plan and any additional permit requirements. • If impacts to non-State listed, special-status plant species cannot be avoided, the species shall be replaced at a 1:1 ratio for acreage and/or individuals impacted through preservation, restoration, or combination of both. A Rare Plant Restoration Plan, approved by the project proponents prior to commencing of construction on the site upon which the rare plant would be impacted, shall be prepared and implemented by a qualified biologist. The plan shall include, but is not limited to, the following: o A detailed description of on-site and/or off-site mitigation areas, salvage of seed and/or soil bank, plant salvage, seeding and planting	Non-HMP species at the Injection Well Facilities site	Prior to project construction	MRWPCA, qualified biologist	During construction and 3 years following completion of construction	MRWPCA qualified biologist

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	specifications, including, if appropriate, increased planting ratio to ensure the applicable success ratio. Specifically, seed shall be collected from the on-site individuals that will be impacted and grown in a local greenhouse, and then transplanted within the mitigation area. Plants shall be transplanted while they are young seedlings in order to develop a good root system. Alternatively, the mitigation area may be broadcast seeded in fall; however, if this method is used, some seed shall be retained in the event that the seeding fails to produce viable plants and contingency measures need to be employed. o A description of a 3-year monitoring program, including specific methods of vegetation monitoring, data collection and analysis, restoration goals and objectives, success criteria, adaptive management if the criteria are not met, reporting protocols, and a funding mechanism. The mitigation area shall be preserved in perpetuity through a conservation easement or other legally enforceable land preservation agreement. Exclusionary fencing shall be installed around the mitigation area to prevent disturbance until success criteria have been met.					
Impact BT-1: Construction Impacts to Special-Status Species and Habitat (continued)	**Mitigation Measure BT-1g: Conduct Pre-Construction Surveys for Special-Status Bats.** To avoid and reduce impacts to special-status bat species, the project proponents shall retain a qualified bat specialist or wildlife biologist to conduct site surveys during the reproductive season (May 1 through September 15) to characterize bat utilization of the component site and potential species present (techniques utilized to be determined by the biologist) prior to tree or building removal. Based on the results of these initial surveys, one or more of the following shall occur: • If it is determined that bats are not present at the component site, no additional mitigation is required. • If it is determined that bats are utilizing the component site and may be impacted by the Project, pre-construction surveys shall be conducted no more than 30 days prior to any tree or building removal (or any other suitable roosting habitat) within 100 feet of construction limits. If, according to the bat specialist, no bats or bat signs are observed in the course of the pre-construction surveys, tree and building removal may proceed. If bats and/or bat signs are observed during the pre-construction surveys, the biologist shall determine if disturbance would jeopardize a maternity roost or another type of roost (i.e., foraging, day, or night). • If a single bat and/or only adult bats are roosting, removal of trees, buildings, or other suitable habitat may proceed after the bats have been safely excluded from the roost. Exclusion techniques shall be determined by the biologist and would depend on the roost type. • If an active maternity roost is detected, avoidance is preferred. Work in the vicinity of the roost (buffer to be determined by biologist) shall be postponed until the biologist monitoring the roost determines that the young have fledged and are no longer dependent on the roost. The monitor shall ensure that all bats have left the area of disturbance prior to initiation of pruning and/or removal of trees that would disturb the roost. If avoidance is not possible and a maternity roost must be disrupted, authorization from CDFW shall be required prior to removal of the roost.	Salinas Pump Station, Salinas Treatment Facility, Blanco Drain Diversion, Product Water Conveyance: RUWAP Alignment and Injection Well Facilities	Prior to project construction	MRWPCA, qualified biologist (bat/wildlife specialist)	Prior to project construction	MRWPCA and qualified biologist
	Mitigation Measure BT-1h: Implementation of Mitigation Measures BT-1a and BT-1b to Mitigate Impacts to the Monterey Ornate Shrew, Coast Horned Lizard, Coast Range Newt, Two-Striped Garter Snake, and Salinas Harvest Mouse. If these species are encountered, implementation of Mitigation Measures BT-1a and BT- 1b, which avoid and minimize impacts through implementing construction best management practices and monitoring, would reduce potential impacts to these species to a less-than-significant level.	Blanco Drain Diversion, Product Water Conveyance: RUWAP Alignment and Injection Well Facilities	Prior to and during project construction	MRWPCA contractors and qualified biologists	Prior to and during project construction	MRWPCA qualified biologist
	Mitigation Measure BT-1i: Conduct Pre-Construction Surveys for Monterey Dusky- Footed Woodrat. To avoid and reduce impacts to the Monterey dusky-footed woodrat, the project proponents shall retain a qualified biologist to conduct pre-construction surveys in suitable habitat proposed for construction, ground disturbance, or staging within three days prior to construction for woodrat nests within the project area and in a buffer zone 100 feet out from the limit of disturbance. All woodrat nests shall be flagged for avoidance of direct construction impacts and protection during construction, where feasible. Nests that cannot be avoided shall be manually deconstructed prior to land clearing activities to allow animals to escape harm. If a litter of young is found or suspected, nest material shall be replaced, and the nest left alone for 2-3 weeks before a re-check to verify that young are capable of independent survival before proceeding with nest dismantling.	Blanco Drain Diversion, Product Water Conveyance: RUWAP Pipeline Alignment, and Injection Well Facilities	Prior to project construction	MRWPCA contractors and qualified biologists	Prior to project construction	MRWPCA qualified biologist

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Impact BT-1: Construction Impacts to Special-Status Species and Habitat (continued)	**Mitigation Measure BT-1j: Conduct Pre-Construction Surveys for American Badger.** To avoid and reduce impacts to the American badger, the project proponents shall retain a qualified biologist to conduct focused pre-construction surveys for badger dens in all suitable habitat proposed for construction, ground disturbance, or staging no more than two weeks prior to construction. If no potential badger dens are present, no further mitigation is required. If potential dens are observed, the following measures are required to avoid potential significant impacts to the American badger: • If the qualified biologist determines that potential dens are inactive, the biologist shall excavate these dens by hand with a shovel to prevent badgers from reusing them during construction. • If the qualified biologist determines that potential dens may be active, the den shall be monitored for a period sufficient (as determined by a qualified biologist) to determine if the den is a maternity den occupied by a female and her young, or if the den is occupied by a solitary badger. • Maternity dens occupied by a female and her young shall be avoided during construction and a minimum buffer of 200 feet in which no construction activities shall occur shall be maintained around the den. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during construction. • Solitary male or female badgers shall be passively relocated by blocking the entrances of the dens with soil, sticks, and debris for three to five days to discourage the use of these dens prior to project construction disturbance. The den entrances shall be blocked to an incrementally greater degree over the three to five day period. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during construction.	Product Water Conveyance: RUWAP Pipeline Alignment	Prior to project construction	MRWPCA construction contractors and qualified biologists	Prior to project construction	MRWPCA qualified biologist
	Mitigation Measure BT-1k: Conduct Pre-Construction Surveys for Protected Avian Species, including, but not limited to, white-tailed kite and California horned lark. Prior to the start of construction activities at each project component site, a qualified biologist shall conduct pre-construction surveys for suitable nesting habitat within the component Project Study Area and within a suitable buffer area from the component Project Study Area. The qualified biologist shall determine the suitable buffer area based on the avian species with the potential to nest at the site. In areas where nesting habitat is present within the component project area or within the determined suitable buffer area, construction activities that may directly (e.g., vegetation removal) or indirectly (e.g., noise/ground disturbance) affect protected nesting avian species shall be timed to avoid the breeding and nesting season. Specifically, vegetation and/or tree removal can be scheduled after September 16 and before January 31. Alternatively, a qualified biologist shall be retained by the project proponents to conduct pre-construction surveys for nesting raptors and other protected avian species where nesting habitat was identified and within the suitable buffer area if construction commences between February 1 and September 15. Pre-construction surveys shall be conducted no more than 14 days prior to the start of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August). Because some bird species nest early in spring and others nest later in summer, surveys for nesting birds may be required to continue during construction to address new arrivals, and because some species breed multiple times in a season. The necessity and timing of these continued surveys shall be determined by the qualified biologist based on review of the final construction plans. If active raptor or other protected avian species nests are identified during the preconstruction surveys, the qualified biologist shall notify the project proponents and an appropriate no-disturbance buffer shall be imposed within which no construction activities or disturbance shall take place until the young have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.	All components	Prior to project construction and if found establish and comply with no-disturbance buffer	MRWPCA, CalAm, construction contractors, and qualified biologists	Prior to project construction	MRWPCA, CalAm, qualified biologist(s), USFWS
	Mitigation Measure BT-1l: Conduct Pre-Construction Surveys for Burrowing Owl. In order to avoid impacts to active burrowing owl nests, a qualified biologist shall conduct pre-construction surveys in suitable habitat within the construction footprint and within a suitable buffer, as determined by a qualified biologist, of the footprint no more than 30 days prior to the start of construction at a component site. If ground disturbing activities are delayed or suspended for more than 30 days after the pre-construction survey, the site shall be resurveyed.	Product Water Conveyance: RUWAP Pipeline Alignment	Prior to project construction	Construction contractor, MRWPCA, qualified	Prior to project construction	MRWPCA qualified biologist

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	The survey shall conform to the DFG 1995 Staff Report protocol. If no burrowing owls are found, no further mitigation is required. If it is determined that burrowing owls occupy the site during the non-breeding season (September 1 through January 31), then a passive relocation effort (e.g., blocking burrows with one-way doors and leaving them in place for a minimum of three days) shall be undertaken to ensure that the owls are not harmed or injured during construction. Once it has been determined that the owls have vacated the site, the burrows shall be collapsed, and ground disturbance can proceed. If burrowing owls are detected within the construction footprint or immediately adjacent lands (i.e. within 250 feet of the footprint) during the breeding season (February 1 to August 31), a construction-free buffer of 250 feet shall be established around all active owl nests. The buffer area shall be enclosed with temporary fencing, and construction equipment and workers shall not enter the enclosed setback areas. Buffers shall remain in place for the duration of the breeding season or until it has been confirmed by a qualified biologist that all chicks have fledged and are independent of their parents. After the breeding season, passive relocation of any remaining owls shall take place as described above.			biologist		
Impact BT-1: Construction Impacts to Special-Status Species and Habitat (continued)	**Mitigation Measure BT-1m: Minimize Effects of Nighttime Construction Lighting.** Nighttime construction lighting shall be focused and downward directed to preclude night illumination of the adjacent open space area.	Injection Well Facilities and CalAm Distribution System: Alternative Monterey Pipeline	During project construction	MRWPCA and CalAm construction contractors	During project construction	MRWPCA, CalAm, City of Seaside, City of Monterey
	Mitigation Measure BT-1p: Avoid and Minimize Impacts to Western Pond Turtle. A qualified biologist shall survey suitable habitat no more than 48 hours before the onset of work activities at the component site for the presence of western pond turtle. If pond turtles are found and these individuals are likely to be killed or injured by work activities, the biologist shall be allowed sufficient time to move them from the site before work activities begin. The biologist shall relocate the pond turtles the shortest distance possible to a location that contains suitable habitat and would not be affected by activities associated with the project.	Blanco Drain Diversion	Prior to project construction	MRWPCA construction contractor and qualified biologist	Prior to project construction	MRWPCA qualified biologist
	Mitigation Measure BT-1q: Avoid and Minimize Impacts to California Red-Legged Frog. The following measures for avoidance and minimization of adverse impacts to California Red-Legged Frog (CRLF) during construction of the Project components are those typically employed for construction activities that may result in short-term impacts to individuals and their habitat. The focus of these measures is on scheduling activities at certain times of year, keeping the disturbance footprint to a minimum, and monitoring. • The MRWPCA shall annually submit the name(s) and credentials of biologists who would conduct activities specified in the following measures. No project construction activities at the component site would begin until the MRWPCA receives confirmation from the USFWS that the biologist(s) is qualified to conduct the work. • A USFWS-approved biologist shall survey the work site 48 hours prior to the onset of construction activities. If CRLF, tadpoles, or eggs are found, the approved biologist shall determine the closest appropriate relocation site. The approved biologist shall be allowed sufficient time to move the CRLF, tadpoles or eggs from the work site before work activities begin. Only USFWS-approved biologists shall participate in activities associated with the capture, handling, and moving of CRLF. • Before any construction activities begin on the project component site, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the CRLF and its habitat, the importance of the CRLF and its habitat, general measures that are being implemented to conserve the CRLF as they relate to the project, and the boundaries within which the project construction activities may be accomplished. Brochures, books and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions. • A USFWS-approved biologist shall be present at the work site until such time as all removal of CRLF, instruction of workers, and disturbance of habitat have been completed. After this time, the biologist shall designate a person to monitor onsite compliance with all minimization measures and any future staff training. The USFWS-approved biologist shall ensure that this individual receives training outlined in Mitigation Measure Bt-1a and in the identification of CRLF. The monitor and the USFWS-approved biologist shall have the authority to stop work if CRLF are in harm's way. • The number of access routes, number and size of staging areas, and the total area of the activity shall be limited to the minimum	Salinas Treatment Facility and Blanco Drain Diversion	Prior to and during project construction	MRWPCA construction contractor and qualified biologist	Prior to and during project construction	MRWPCA, qualified biologist, USFWS

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	necessary to achieve the project goal. Routes and boundaries shall be clearly demarcated, and these areas shall be outside of riparian and wetland areas to the extent practicable. • Work activities shall be completed between April 1 and November 1, to the extent practicable. Should the project proponent demonstrate a need to conduct activities outside this period, the project proponent may conduct such activities after obtaining USFWS approval (applies to Blanco Drain site only). • If a work site is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than five millimeters (mm) to prevent CRLF from entering the pump system. Water shall be released or pumped downstream at an appropriate rate to maintain downstream flows during construction. Upon completion of construction activities, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate. • The Declining Amphibian Populations Task Force's Fieldwork Code of Practice shall be followed to minimize the possible spread of chytrid fungus or other amphibian pathogens and parasites.					
Impact BT-2: Construction Impacts to Sensitive Habitats	**Mitigation Measure BT-2a**: **Avoidance and Minimization of Impacts to Riparian Habitat and Wetland Habitats.** Implement Mitigation Measure BT-1a. When designing the facilities at these component sites, the MRWPCA shall site and design project features to avoid impacts to the riparian and wetland habitats shown in Attachment 8 of Appendix H and Appendix I, including direct habitat removal and indirect hydrology and water quality impacts, to the greatest extent feasible while taking into account site and engineering constraints. To protect this sensitive habitat during construction, the following measures shall be implemented: • Place construction fencing around riparian and wetland habitat (i.e., areas adjacent to or nearby the Project construction) to be preserved to ensure construction activities and personnel do not impact this area. • All proposed lighting shall be designed to avoid light and glare into the riparian and wetland habitat. Light sources shall not illuminate these areas or cause glare. In the event that full avoidance is not possible and a portion or all of the riparian and wetland habitat would be impacted, the following minimization measures shall be implemented: • Permanently impacted riparian and wetland habitat shall be mitigated at no less than a 2:1 replacement-to-loss ratio through restoration and/or preservation. The final mitigation amounts for both temporary and permanent impacts to riparian and wetland habitat shall be determined during the design phase but cannot be less than 2:1 for permanent impacts and 1:1 for temporary impacts, and must be approved by the relevant permitting agencies (USACOE, RWQCB, CDFW, and the entity issuing any Coastal Development Permit). The preserved mitigation land shall be managed to improve wetland and riparian conditions compared to existing conditions. It is expected that the mitigation can occur within the Locke Paddon Lake watershed, along the Tembladero Slough, and within the Salinas River corridor near the Blanco Drain near where impacts may occur. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared by a qualified biologist to mitigate for impacts to riparian and wetland habitat. The HMMP shall outline the details of a riparian and wetland habitat restoration plan, including but not limited to, planting plan, success criteria, monitoring protocols to determine if the success criteria have been met, adaptive management protocols in the case that the success criteria are not met, and funding assurances. Plantings and revegetation conducted in compliance with this mitigation measure shall be monitored for a minimum of three years after project completion.	Reclamation Ditch, Tembladero Slough Diversion, Blanco Drain Diversion	Prior to and during project construction	MRWPCA construction contractor and qualified biologist	Prior to and during project construction	MRWPCA qualified biologist

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
Impact BT-2: Construction Impacts to Sensitive Habitats (continued)	**Mitigation Measure BT-2c**: The project proponents in coordination with the contractor shall prepare and implement a Frac-Out Plan to avoid or reduce accidental impacts resulting from horizontal directional drilling (HDD) beneath the Salinas River. The Frac-Out Plan shall address spill prevention, containment, and clean-up methodology in the event of a frac out. The proposed HDD component of the Blanco Drain diversion shall be designed and conducted to minimize the risk of spills and frac-out events. The Frac-Out Plan shall be prepared and submitted to United States Fish and Wildlife Services, California Department of Fish and Wildlife, National Marine Fisheries Services, and the Regional Water Quality Control Board prior to commencement of HDD activities for the Blanco Drain Diversion construction. The following are typical contents of a Frac-Out Plan: • Project description, including details of the HDD design and operations • Site description and existing conditions • Potential modes of HDD failure and HDD failure prevention and mitigation • Frac-out prevention measures (including for example, geotechnical investigations, planning for appropriate depths based on those investigations, presence of a qualified engineer during drilling to monitor the drilling process, live adjustments to the pace of drill advancement to ensure sufficient time for cutting and fluid circulation and to prevent or minimize plugging, maintaining the minimum drilling pressure necessary to maintain fluid circulation, etc.) • Monitoring requirements (for example, monitoring pump pressure circulation rate, ground surface and surface water inspection, advancing the drill only during daytime hours, on-site biological resource monitoring by a qualified biologist) • Response to accidental frac-out (including stopping drilling, permitting agency notification, surveying the area, containing the frac-out material, contacting the project biological monitor to identify and relocate species potentially in the area, turbidity monitoring, procedures for clean-up and mitigation of hazardous waste spill materials, preparation of documentation of the event, etc.) Coordination plan and contact list of key project proponents, biological monitor, and agency staff in the event of an accidental frac-out event.	Blanco Drain Diversion	Prior to project construction	MRWPCA, construction contractors	Prior to and during project construction	MRWPCA, USFWS, CDFW, NOAA/NMFS, RWQCB
Impact BT-4: Construction Conflicts with Local Policies, Ordinances, or Approved Habitat Conservation Plan	**Mitigation Measure BT-4. HMP Plant Species Salvage.** For impacts to the HMP plant species within the Project Study Area that do not require take authorization from USFWS or CDFW, salvage efforts for these species shall be evaluated by a qualified biologist per the requirements of the HMP and BO. A salvage plan shall be prepared and implemented by a qualified biologist, which shall would include, but is not limited to: a description and evaluation of salvage opportunities and constraints; a description of the appropriate methods and protocols of salvage and relocation efforts; identification of relocation and restoration areas; and identification of qualified biologists approved to perform the salvage efforts, including the identification of any required collection permits from USFWS and/or CDFW. Where proposed, seed collection shall occur from plants within the Project Study Area and topsoil shall be salvaged within occupied areas to be disturbed. Seeds shall be collected during the appropriate time of year for each species by qualified biologists. At the time of seed collection, a map shall also be prepared that identifies the specific locations of the plants for any future topsoil preservation efforts. The collected seeds shall be used to revegetate temporarily disturbed construction areas and reseeding and restoration efforts on- or off-site, as determined appropriate in the salvage plan.	Product Water Conveyance: RUWAP Pipeline Alignment, and Injection Well Facilities site within the former Fort Ord only	Prior to, during, and after construction	MRWPCA Biologist	During, and after construction	MRWPCA qualified biologist
Impact CR-1: Construction Impacts on Historic Resources	**Mitigation Measure CR-1: Avoidance and Vibration Monitoring for Pipeline Installation in the Presidio of Monterey Historic District, and Downtown Monterey.** Avoidance and Vibration Monitoring for Pipeline Installation in the Presidio of Monterey Historic District, and Downtown Monterey. (Applies to portion of the CalAm Distribution System: Alternative Monterey Pipeline) CalAm shall construct the section of the Alternative Monterey Pipeline located on Stillwell Avenue within the Presidio of Monterey Historic District, adjacent to the Spanish Royal Presidio, and within the Monterey Old Town National Historic Landmark District (including adjacent to Stokes Adobe, the Gabriel de la Torre Adobe, the Fremont Adobe, Colton Hall, and Friendly Plaza in downtown Monterey)[2] as close as possible to the centerlines of these streets to: (1) avoid direct impacts to the historic Presidio Entrance Monument, and (2) reduce impacts from construction	Portion of the CalAm Distribution System-Alternative Monterey Pipeline within historic districts and adjacent to historic buildings	During project construction	CalAm, project engineers, construction contractors	During project construction	CalAm and City of Monterey

[2] A modification to this mitigation measure has been made to clarify its applicability to the Staff-Recommendation Alternative of the GWR Project. Specifically, the text highlighted in gray has been added and the following text deleted: "and within W. Franklin Street in downtown Monterey." This change to the mitigation measure does not constitute significant new information; it merely clarifies the mitigation for the selected alternative.

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	vibration to below the 0.12 inches per second (in/sec) peak particle velocity vibration PPV) threshold. If CalAm determines that the pipeline cannot be located near the centerline of these street segments due to traffic concerns or existing utilities, the historic properties identified on Table 4.6-2 of the GWR Project Draft EIR (MRWPCA/DD&A, April 2015) shall be monitored for vibration during pipeline construction, especially during the use of jackhammers and vibratory rollers. If construction vibration levels exceed 0.12 in/sec PPV, construction shall be halted and other construction methods shall be employed to reduce the vibration levels below the standard threshold. Alternative construction methods may include using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation. If impact sheet pile installation is needed (i.e., for horizontal directional drilling or jack-and-bore) within 80 feet of any historical resource or within 80 feet of a historic district, CalAm shall monitor vibration levels to ensure that the 0.12-in/sec PPV damage threshold is not exceeded. If vibration levels exceed the applicable threshold, the contractor shall use alternative construction methods such as vibratory pile drivers.					
Impact CR-2: Construction Impacts on Archaeological Resources or Human Remains	**Mitigation Measure CR-2a**: **Archaeological Monitoring Plan.** Each of the project proponents shall contract a qualified archaeologist meeting the Secretary of the Interior's Qualification Standard (Lead Archaeologist) to prepare and implement an Archaeological Monitoring Plan, and oversee and direct all archaeological monitoring activities during construction. Archaeological monitoring shall be conducted for all subsurface excavation work within 100 feet of Presidio #2 in the Presidio of Monterey, and within the areas of known archaeologically sensitive sites in Monterey[3]. At a minimum, the Archaeological Monitoring Plan shall: • Detail the cultural resources training program that shall be completed by all construction and field workers involved in ground disturbance; • Designate the person(s) responsible for conducting monitoring activities, including Native American monitor(s), if deemed necessary; • Establish monitoring protocols to ensure monitoring is conducted in accordance with current professional standards provided by the California Office of Historic Preservation; • Establish the template and content requirements for monitoring reports; • Establish a schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; • Establish protocols for notifications in case of encountering cultural resources, as well as methods for evaluating significance, developing and implementing a plan to avoid or mitigate significant resource impacts, facilitating Native American participation and consultation, implementing a collection and curation plan, and ensuring consistency with applicable laws including Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code; • Establish methods to ensure security of cultural resources sites; • Describe the appropriate protocols for notifying the County, Native Americans, and local authorities (i.e. Sheriff, Police) should site looting and other illegal activities occur during construction with reference to Public Resources Code 5097.99. During the course of the monitoring, the Lead Archaeologist may adjust the frequency—from continuous to intermittent—of the monitoring based on the conditions and professional judgment regarding the potential to encounter resources. If archaeological materials are encountered, all soil disturbing activities within 100 feet of the find shall cease until the resource is evaluated. The Lead Archaeologist shall immediately notify the relevant Project proponent of the encountered archaeological resource. The Lead Archaeologist shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological resource, present the findings of this assessment to the lead agency, or CPUC, for the CalAm Distribution Pipeline. In the event archaeological resources qualifying as either historical resources pursuant to CEQA Section 15064.5 or as unique archaeological resources as defined by Public Resources Code 21083.2 are encountered, preservation in place shall be the preferred manner of mitigation.	Lake El Estero Diversion Site and CalAm Distribution System: Alternative Monterey Pipeline	Prior to and during project construction	MRWPCA (for Lake El Estero Diversion only), CalAm, qualified archaeologist	During project construction	MRWPCA, CalAm, qualified archaeologist

[3] A modification to this mitigation measure has been made to clarify its applicability to the Staff-Recommendation Alternative of the GWR Project. Specifically, the text highlighted in gray has been added and the following text deleted: "in downtown Monterey on W. Franklin Street between High and Figuero Streets, and at potentially sensitive archaeological sites at Lake El Estero"

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	If preservation in place is not feasible, the applicable project proponent(s) shall implement an Archaeological Research Design and Treatment Plan (ARDTP). The Lead Archaeologist, Native American representatives, and the State Historic Preservation Office designee shall meet to determine the scope of the ARDTP. The ARDTP will identify a program for the treatment and recovery of important scientific data contained within the portions of the archaeological resources located within the project Area of Potential Effects; would preserve any significant historical information obtained; and will identify the scientific/historic research questions applicable to the resources, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The results of the investigation shall be documented in a technical report that provides a full artifact catalog, analysis of items collected, results of any special studies conducted, and interpretations of the resource within a regional and local context. All technical documents shall be placed on file at the Northwest Information Center of the California Historical Resources Information System.					
	Mitigation Measure CR-2b: **Discovery of Archaeological Resources or Human Remains.** If archaeological resources or human remains are unexpectedly discovered during any construction, work shall be halted within 50 meters (±160 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented. The County Coroner shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are determined to be of Native American origin.	All components	During project construction	MRWPCA, CalAm, and qualified archaeologists	During project construction	MRWPCA, CalAm, and qualified archaeologist
	Mitigation Measure CR-2c: **Native American Notification.** Because of their continuing interest in potential discoveries during construction, all listed Native American Contacts shall be notified of any and all discoveries of archaeological resources in the project area.	All components	During project construction	MRWCPA, CalAm and qualified archaeologist	During project construction	MRWCPA, CalAm and qualified archaeologist
Impact EN-1: Construction Impacts due to Temporary Energy Use	**Mitigation Measure EN-1**: **Construction Equipment Efficiency Plan.** MRWPCA (for all components except the CalAm Distribution System) or CalAm (for the Cal Am Distribution System) shall contract a qualified professional (i.e., construction planner/energy efficiency expert) to prepare a Construction Equipment Efficiency Plan that identifies the specific measures that MRWPCA or CalAm (and its construction contractors) will implement as part of project construction to increase the efficient use of construction equipment. Such measures shall include, but not necessarily be limited to: procedures to ensure that all construction equipment is properly tuned and maintained at all times; a commitment to utilize existing electricity sources where feasible rather than portable diesel-powered generators; consistent compliance with idling restrictions of the state; and identification of procedures (including the use of routing plans for haul trips) that will be followed to ensure that all materials and debris hauling is conducted in a fuel-efficient manner.	All components	Prior to project construction	MRWPCA, CalAm. energy efficiency expert, construction contractors	During project construction	MRWPCA and CalAm
Impact HH-2: Accidental Release of Hazardous Materials During Construction	**Mitigation Measure HH-2a**: **Environmental Site Assessment.** If required by local jurisdictions and property owners with approval responsibility for construction of each component, MRWPCA and CalAm shall conduct a Phase I Environmental Site Assessment in conformance with ASTM Standard 1527-05 to identify potential locations where hazardous material contamination may be encountered. If an Environmental Site Assessment indicates that a release of hazardous materials could have affected soil or groundwater quality at a project site, a Phase II environmental site assessment shall be conducted to determine the extent of contamination and to prescribe an appropriate course of remediation, including but not limited to removal of contaminated soils, in conformance with state and local guidelines and regulations. If the results of the subsurface investigation(s) indicate the presence of hazardous materials, additional site remediation may be required by the applicable state or local regulatory agencies, and the contractors shall be required to comply with all regulatory requirements for facility design or site remediation.	Lake El Estero Diversion, Product Water Conveyance RUWAP Pipeline Alignment, Injection Well Facilities and the CalAm Distribution System: Alternative Monterey Pipeline	Prior to project construction (if presence of hazardous materials is identified, site remediation or design changes may be required)	MRWPCA and CalAm project engineers, construction contractors	Only needed until owner/contractor deems each construction site is deemed safe for required construction	MRWPCA and CalAm
	Mitigation Measure HH-2b: **Health and Safety Plan.** The construction contractor(s) shall prepare and implement a project-specific Health and Safety Plan (HSP) for each site on which construction may occur, in accordance with 29 CFR 1910 to protect construction workers and the public during all excavation, grading, and construction. The HSP shall include the following, at a minimum: • A summary of all potential risks to construction workers and the maximum exposure limits for all known and reasonably foreseeable site	Lake El Estero Diversion, Product Water Conveyance RUWAP Pipeline	Prior to project construction	Construction contactors	During project construction	MRWPCA, CalAm, Monterey County Dept. of Environmental

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Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	chemicals (the HSP shall incorporate and consider the information in all available existing Environmental Site Assessments and remediation reports for properties within ¼-mile using the EnviroStor Database); • Specified personal protective equipment and decontamination procedures, if needed; • Emergency procedures, including route to the nearest hospital; Procedures to be followed in the event that evidence of potential soil or groundwater contamination (such as soil staining, noxious odors, debris or buried storage containers) is encountered. These procedures shall be in accordance with hazardous waste operations regulations and specifically include, but are not limited to, the following: immediately stopping work in the vicinity of the unknown hazardous materials release, notifying Monterey County Department of Environmental Health, and retaining a qualified environmental firm to perform sampling and remediation; and The identification and responsibilities of a site health and safety supervisor.	Alignment , the Injection Well Facilities, and the CalAm Distribution System: Alternative Monterey Pipeline				Health
	Mitigation Measure HH-2c: **Materials and Dewatering Disposal Plan.** MRWPCA and CalAm and/or their contractors shall develop a materials disposal plan specifying how the contractor will remove, handle, transport, and dispose of all excavated material in a safe, appropriate, and lawful manner. The plan must identify the disposal method for soil and the approved disposal site, and include written documentation that the disposal site will accept the waste. For areas within the Seaside munitions response areas called Site 39 (coincident with the Injection Well Facilities component), the materials disposal plans shall be reviewed and approved by FORA and the City of Seaside. The contractor shall develop a groundwater dewatering control and disposal plan specifying how the contractor will remove, handle, and dispose of groundwater impacted by hazardous substances in a safe, appropriate, and lawful manner. The plan must identify the locations at which potential contaminated groundwater dewatering are likely to be encountered (if any), the method to analyze groundwater for hazardous materials, and the appropriate treatment and/or disposal methods. If the dewatering effluent contains contaminants that exceed the requirements of the General WDRs for Discharges with a Low Threat to Water Quality (Order No. R3-2011-0223, NPDES Permit No. CAG993001), the construction contractor shall contain the dewatering effluent in a portable holding tank for appropriate offsite disposal or discharge. The contractor can either dispose of the contaminated effluent at a permitted waste management facility or discharge the effluent, under permit, to the Regional Treatment Plant.	Lake El Estero Diversion, Product Water Conveyance: RUWAP Pipeline Alignment , the Injection Well Facilities, and the CalAm Distribution System: Alternative Monterey Pipeline	Prior to and during project construction	MRWPCA, CalAm, construction contractors	During project construction	MRWPCA and CalAm; FORA and the City of Seaside for areas within Site 39
Impact HS-4: Operational Surface Water Quality Impacts due to Source Water Diversions	**Mitigation Measure HS-4**: **Management of Surface Water Diversion Operations**. Rapid, imposed water-level fluctuations shall be avoided when operating the Reclamation Ditch Diversion pumps to minimize erosion and failure of exposed (or unvegetated), susceptible banks. This can be accomplished by operating the pumps at an appropriate flow rate, in conjunction with commencing operation of the pumps only when suitable water levels or flow rates are measured in the water body. Proper control shall be implemented to ensure that mobilized sediment would not impair downstream habitat values and to prevent adverse impacts due to water/soil interface adjacent to the Reclamation Ditch and Tembladero Slough. During planned routine maintenance at the Reclamation Ditch Diversion, maintenance personnel shall inspect the diversion structures within the channel for evidence of any adverse fluvial geomorphological processes (for example, undercutting, erosion, scour, or changes in channel cross-section). If evidence of any substantial adverse changes is noted, the diversion structure shall be redesigned and the project proponents shall modify it in accordance with the new design.	Reclamation Ditch Diversion	During project operations	MRWPCA	During project operations	MRWPCA
Cumulative impacts to marine water quality	**Mitigation Measure HS-C: Implement Measures to Avoid Exceedances over Water Quality Objectives at the Edge of the Zone of Initial Dilution (ZID).** As part of the amendment process to modify the existing MRWPCA NPDES Permit (Order No. R3-2014-0013, NPDES Permit No. CA0048551) per 40 Code of Regulations Part 122.62, it would be necessary to conduct an extensive assessment in accordance with requirements to be specified by the RWQCB. It is expected that the assessment would include, at a minimum, an evaluation of the minimum probable initial dilution at the point of discharge based on likely discharge scenarios and any concomitant impacts on water quality and beneficial uses per the Ocean Plan. Prior to operation of the MPSWP desalination plant, the discharger(s) will be required to test the MPSWP source water in accordance with protocols approved by the RWQCB. If the water quality assessment indicates that the water at the edge of the ZID will exceed the Ocean Plan water quality objectives, the MRWPCA will not accept the desalination brine discharge at its outfall, and the following design features and/or operational measures shall be employed, individually or in combination, to reduce the concentration of	Ocean discharges upon implementation of cumulative project (specifically, the MPWSP with 6.4 mgd desalination plant)	Prior to operation of the MPWSP (with 6.4 mgd desalination plant)	MRWPCA	During operations of the MPWSP with 6.4 mgd desalination plant	MRWPCA (under regulations by the RWQCB)

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	constituents to below the Ocean Plan water quality objectives at the edge of the ZID: • ***Additional pre-treatment of MPWSP source water at the Desalination Plant:*** Feasible methods to remove PCBs and other organic compounds from the MPWSP source water at the desalination plant include additional filtration or use of granular activated carbon (GAC). GAC acts as a very strong sorbent and can effectively remove PCBs and other organic compounds from the desalination plant source water (Luthy, Richard G., 2015). • ***Treatment of discharge at the Desalination Plant:*** Feasible methods to remove residual compounds from the discharge to comply with water quality objectives at the edge of the ZID are use of GAC (similar to that under the additional pre-treatment of MPWSP source water) and advanced oxidation with ultraviolet light with concurrent addition of hydrogen peroxide. The method of using advanced oxidation with ultraviolet light with concurrent addition of hydrogen peroxide is used for the destruction of a variety of environmental contaminants such as synthetic organic compounds, volatile organic compounds, pesticides, pharmaceuticals and personal care products, and disinfection byproducts. This process is energy intensive, but requires a relatively small construction footprint. • ***Short-term storage and release of brine at the Desalination Plant:*** When sufficient quantities of treated wastewater from the Regional Treatment Plant to prevent an exceedance of Ocean Plan objectives at the edge of the ZID are not available, brine from the desalination plant would be temporarily stored at the MPWSP site in the brine storage basin,23 and discharged (pumped) in pulse flows (up to the capacity of the existing outfall), such that the flow rate allows the discharge to achieve a dilution level that meets Ocean Plan water quality objectives at the edge of the ZID. • ***Biologically Active Filtration at the Regional Treatment Plant:*** As part of the proposed AWT Facility at the Regional Treatment Plant, the GWR Project includes the potential for use of upflow biologically active filtration following ozone treatment to reduce the concentration of ammonia and residual organic matter present in the ozone effluent and to reduce the solids loading on the membrane filtration process. The biologically active filtration system would consist of gravity-feed filter basins with approximately 12 feet of granular media, and a media support system. Ancillary systems would include an alkalinity addition system for pH control, backwash waste water basin (also used for membrane filtration backwash waste water), backwash pumps, an air compressor and supply system for air scour, an air compressor and supply system for process air, and a wash water basin to facilitate filter backwashing (the wash water basin may be combined with the membrane filtration flow equalization basin). This biologically active filtration system may be needed to meet Ocean Plan water quality objectives at the edge of the ZID (if and/or when discharges from the Project are combined with discharges from the MPWSP with 6.4 million gallon per day, or mgd, desalination plant). This optional component of the Project is described in Chapter 2, Project Description (see Section 2.8.1.3), would become a required process if the MPWSP with 6.4 mgd desalination project is in operation and the other components of the mitigation do not achieve Ocean Plan compliance.					
Impact LU-1: Temporary Farmland Conversion during Construction	**Mitigation Measure LU-1: Minimize Disturbance to Farmland.** To support the continued productivity of designated Prime Farmland and Farmland of Statewide Importance, the following provisions shall be included in construction contract specifications: • Construction contractor(s) shall minimize the extent of the construction disturbance, including construction access and staging areas, in designated important farmland areas. • Prior to the start of construction, the construction contractor(s) shall mark the limits of the construction area and ensure that no construction activities, parking, or staging occur beyond the construction limits. • Upon completion of the active construction, the site shall be restored to pre-construction conditions.	Salinas Treatment Facility and a portion of the Blanco Drain Diversion	During project construction	Construction contractor	During project construction	MRWPCA
Impact LU-2: Operational Consistency with Plans,	See the following mitigation measures: AQ-1, BF-1a, BF-1b, BF-1c, BF-2a or Alternate BF-2a, BT-1a through BT-1q, BT-2a through BT-2c, CR-2a through CR-2c, EN-1, NV-1a through NV-1d, NV-2a, NV-2b, PS-3, TR-2, TR-3, and TR-4.	All components	See other rows for specific timing of each mitigation	See other lines for responsibilities for each	See other rows for specific timing of	See other rows for responsibilities for each mitigation measure

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Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
Policies, and Regulations			measure	mitigation measure	each mitigation measure	
Cumulative impacts to marine biological resources	**Mitigation Measure MR-C. Implement Measures to Avoid Exceedances over Water Quality Objectives at the Edge of the Zone of Initial Dilution.** Implement Mitigation Measure HS-C above.	Ocean discharges upon implementation of cumulative project (specifically, the MPWSP with 6.4 mgd desalination plant)	Prior to operation of MPWSP (with 6.4 mgd desalination plant)	MRWPCA	During operations of the MPWSP with 6.4 mgd desalination plant	MRWPCA (under regulations by the RWQCB)
Impact NV-1: Construction Noise	**Mitigation Measure NV-1a: Drilling Contractor Noise Measures.** Contractor specifications shall include a requirement that drill rigs located within 700 feet of noise-sensitive receptors shall be equipped with noise reducing engine housings or other noise reducing technology and the line of sight between the drill rig and nearby sensitive receptors shall be blocked by portable acoustic barriers and/or shields to reduce noise levels such that drill rig noise levels are no more 75 dBA (or, A-Weighted Sound Level) at 50 feet. This would reduce the nighttime noise level to less than 60 dBA Leq (Equivalent Noise Level) at the nearest residence. The contractor shall submit to the MRWPCA and the Seaside Building Official, a "Well Construction Noise Control Plan" for review and approval. The plan shall identify all feasible noise control procedures that would be implemented during night-time construction activities. At a minimum, the plan shall specify the noise control treatments to achieve the specified above noise performance standard.	Injection Well Facilities	Prior to and during project construction	Construction contractors	During project construction	MWRPCA, Seaside building official
	Mitigation Measure NV-1b: **Monterey Pipeline Noise Control Plan for Nighttime Pipeline Construction.** CalAm shall submit a Noise Control Plan for all nighttime pipeline work to the California Public Utilities Commission for review and approval prior to the commencement of project construction activities. The Noise Control Plan shall identify all feasible noise control procedures to be implemented during nighttime pipeline installation in order to reduce noise levels to the extent practicable at the nearest residential or noise sensitive receptor. At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels during nighttime pipeline installation activities.	CalAm Distribution System: Alternative Monterey Pipeline	Prior to project construction	CalAm	During project construction	CalAm, CPUC and City of Monterey
	Mitigation Measure NV-1c: **Neighborhood Notice**. Residences and other sensitive receptors within 900 feet of a nighttime construction area shall be notified of the construction location and schedule in writing, at least two weeks prior to the commencement of construction activities. The notice shall also be posted along the proposed pipeline alignments, near the proposed facility sites, and at nearby recreational facilities. The contractor shall designate a noise disturbance coordinator who would be responsible for responding to complaints regarding construction noise. The coordinator shall determine the cause of the complaint and ensure that reasonable measures are implemented to correct the problem. A contact number for the noise disturbance coordinator shall be conspicuously placed on construction site fences and included in the construction schedule notification sent to nearby residences. The notice to be distributed to residences and sensitive receptors shall first be submitted, for review and approval, to the MRWPCA and city and county staff as may be required by local regulations.	Injection Well Facilities and CalAm Distribution System: Alternative Monterey Pipeline	Prior to project construction	MRWPCA, CalAm, construction contractor, noise disturbance coordinator	Prior to project construction	MRWPCA and CalAm

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	Mitigation Measure NV-1d: RUWAP Pipeline Construction Noise. The following measures will be implemented by the project proponents in response to comments from the Marina Coast Water District for the RUWAP alignment option of the Product Water Conveyance Pipeline: • The construction contractor shall limit exterior construction related activities to the hours of restriction consistent with the noise ordinance of, and encroachment permits issued by, the relevant land use jurisdictions. • The contractor shall locate all stationary noise-generating equipment as far as possible from nearby noise-sensitive receptors. Where possible, noise generating equipment shall be shielded from nearby noise-sensitive receptors by noise-attenuating buffers. Stationary noise sources located 500 feet from noise-sensitive receptors shall be equipped with noise reducing engine housings. Where possible and required by the local jurisdiction, portable acoustic barriers shall be placed around stationary noise generating equipment that is located less than 200 feet from noise-sensitive receptors. • The contractor shall assure that construction equipment powered by gasoline or diesel engines have sound control devices at least as effective as those provided by the original equipment manufacturer (OEM). No equipment shall be permitted to have an unmuffled exhaust. • The contractor shall assure that noise-generating mobile equipment and machinery are shut-off when not in use. Residences within 500 feet of a construction area shall be notified of the construction schedule in writing, prior to construction. The project proponent(s) and contractor shall designate a noise disturbance coordinator who would be responsible for responding to complaints regarding construction noise. The coordinator shall determine the cause of the complaint and ensure that reasonable measures are implemented to correct the problem. A contact number for the noise disturbance coordinator shall be conspicuously placed on construction site fences and written into the construction notification schedule sent to nearby residences.	RUWAP Pipeline Alignment	Prior to project construction	MRWPCA, construction contractor, noise disturbance coordinator	Prior to project construction	MRWPCA
Impact NV-2: Construction Noise That Exceeds or Violate Local Standards	**Mitigation Measure NV-2a**: **Construction Equipment.** Contractor specifications shall include a requirement that the contractor shall: • Assure that construction equipment with internal combustion engines has sound control devices at least as effective as those provided by the original equipment manufacturer. No equipment shall be permitted to have an un-muffled exhaust. • Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler shall be placed on the compressed air exhaust to lower noise levels by approximately 10 dBA. External jackets shall be used on impact tools, where feasible, in order to achieve a further reduction of 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. • The construction contractor(s) shall locate stationary noise sources (e.g., generators, air compressors) as far from nearby noise-sensitive receptors as possible. • For Product Water Conveyance pipeline segments within the City of Marina, noise controls shall be sufficient to not exceed 60 decibels for more than twenty-five percent of an hour.	Reclamation Ditch Diversion, Tembladero Slough Diversion, Blanco Drain Diversion, Product Water Conveyance: (RUWAP Pipeline) segments within the City of Marina and RUWAP Booster Station	During project construction	MRWPCA construction contractor	During project construction	MRWPCA
	Mitigation Measure NV-2b: Construction Hours. The construction contractor shall limit all noise-producing construction activities within the City of Marina to between the hours of 7:00 AM and 7:00 PM on weekdays and between 9:00 AM and 7:00 PM Saturdays.	Product Water Conveyance: RUWAP Pipeline and Booster Pump Station in Marina	During project construction	Construction contractor	During project construction	MRWPCA
Impact PS-3: Construction Solid Waste Policies and Regulations	**Mitigation Measure PS-3**: **Construction Waste Reduction and Recycling Plan**. The construction contractor(s) shall prepare and implement a construction waste reduction and recycling plan identifying the types of construction debris the Project will generate and the manner in which those waste streams will be handled. In accordance with the California Integrated Waste Management Act of 1989, the plan shall emphasize source reduction measures, followed by recycling and composting methods, to ensure that construction and demolition waste generated by the project is managed consistent with applicable statutes and regulations. In accordance with the California Green Building	All components	Prior to, during, and after project construction	MRWPCA and CalAm construction contractors	Upon project completion	MRWPCA and CalAm

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	Standards Code and local regulations, the plan shall specify that all trees, stumps, rocks, and associated vegetation and soils, and 50% of all other nonhazardous construction and demolition waste, be diverted from landfill disposal. The plan shall be prepared in coordination with the Monterey Regional Waste Management District and be consistent with Monterey County's Integrated Waste Management Plan. Upon project completion, MRWPCA and CalAm shall collect the receipts from the contractor(s) to document that the waste reduction, recycling, and diversion goals have been met.					
Impact TR-2: Construction-Related Traffic Delays, Safety and Access Limitations	**Mitigation Measure TR-2**: **Traffic Control and Safety Assurance Plan.** Prior to construction, MRWPCA and/or its contractor shall prepare and implement a traffic control plan or plans for the roadways and intersections affected by MRWPCA construction (Product Water Conveyance Pipeline) and CalAm shall prepare and implement a traffic control plan for the roadways and intersections affected by the CalAm Distribution System Improvements (Transfer and Monterey pipelines). The traffic control plan(s) shall comply with the affected jurisdiction's encroachment permit requirements and will be based on detailed design plans. For all project construction activities that could affect the public right-of-way (e.g., roadways, sidewalks, and walkways), the plan shall include measures that would provide for continuity of vehicular, pedestrian, and bicyclist access; reduce the potential for traffic accidents; and ensure worker safety in construction zones. Where project construction activities could disrupt mobility and access for bicyclists and pedestrians, the plan shall include measures to ensure safe and convenient access would be maintained. The traffic control and safety assurance plan shall be developed on the basis of detailed design plans for the approved project. The plan shall include, but not necessarily be limited to, the elements listed below: ***General*** a. Develop circulation and detour plans to minimize impacts on local streets. As necessary, signage and/or flaggers shall be used to guide vehicles to detour routes and/or through the construction work areas. b. Implement a public information program to notify motorists, bicyclists, nearby residents, and adjacent businesses of the impending construction activities (e.g., media coverage, email notices, websites, etc.). Notices of the location(s) and timing of lane closures shall be published in local newspapers and on available websites to allow motorists to select alternative routes. ***Roadways*** c. Haul routes that minimize truck traffic on local roadways and residential streets shall be used to the extent feasible. d. Schedule truck trips outside of peak morning and evening commute hours to minimize adverse impacts on traffic flow. e. Limit lane closures during peak hours. Travel lane closures, when necessary, shall be managed such that one travel lane is kept open at all times to allow alternating traffic flow in both directions along affected two-lane roadways. In the City of Marina, one-way traffic shall be limited to a maximum of 5 minutes of traffic delay. f. Restore roads and streets to normal operation by covering trenches with steel plates outside of normal work hours or when work is not in progress. g. Comply with roadside safety protocols to reduce the risk of accidents. Provide "Road Work Ahead" warning signs and speed control (including signs informing drivers of state legislated double fines for speed infractions in a construction zone) to achieve required speed reductions for safe traffic flow through the work zone. Train construction personnel to apply appropriate safety measures as described in the plan. h. Provide flaggers in school areas at street crossings to manage traffic flow and maintain traffic safety during the school drop-off and pickup hours on days when pipeline installation would occur in designated school zones. i. Maintain access to private driveways. j. Coordinate with MST so the transit provider can temporarily relocate bus routes or bus stops in work zones as deemed necessary. ***Pedestrian and Bicyclists*** k. Perform construction that crosses on street and off street bikeways, sidewalks, and other walkways in a manner that allows for safe access for bicyclists and pedestrians. Alternatively, provide safe detours to reroute affected bicycle/pedestrian traffic. ***Recreational Trails*** l. At least two weeks prior to construction, post signage along all potentially affected recreational trails; Class I, II, and II bicycle routes; and pedestrian pathways, including the Monterey Peninsula Recreational Trail, to warn bicyclists and pedestrians of construction activities. The	Product Water Conveyance: RUWAP Pipeline and CalAm Distribution System: Alternative Monterey Pipeline	Prior to project construction	MRWPCA and CalAm construction contractor	During project construction	MRWPCA, CalAm, and local jurisdictions

Exhibit B.
Mitigation Monitoring and Reporting Program – Pure Water Monterey Groundwater Replenishment Project: Staff-Recommended Alternative

Impacts	Mitigation Measures	Applicable Components	Timing of Implementation	Implementation Responsibility[1]	Timing of Monitoring	Responsibility for Compliance Monitoring[1]
	signs shall include information regarding the nature of construction activities, duration, and detour routes. Signage shall be composed of or encased in weatherproof material and posted in conspicuous locations, including on park message boards, and existing wayfinding signage and kiosks, for the duration of the closure period. At the end of the closure period, CalAm, MRWPCA or either of its contractors shall retrieve all notice materials. *Emergency Access* m. Maintain access for emergency vehicles at all times. Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. n. Provide advance notification to local police, fire, and emergency service providers of the timing, location, and duration of construction activities that could affect the movement of emergency vehicles on area roadways. o. Avoid truck trips through designated school zones during the school drop-off and pickup hours.					
Impact TR-3: Construction-Related Roadway Deterioration	**Mitigation Measure TR-3**: **Roadway Rehabilitation Program.** Prior to commencing project construction, MRWPCA (for all components other than the CalAm Distribution System Improvements) and CalAm (for CalAm Distribution System Improvements) shall detail the preconstruction condition of all local construction access and haul routes proposed for substantial use by project-related construction vehicles. The construction routes surveyed must be consistent with those identified in the construction traffic control and safety assurance plan developed under Mitigation Measure TR-2. After construction is completed, the same roads shall be surveyed again to determine whether excessive wear and tear or construction damage has occurred. Roads damaged by project-related construction vehicles shall be repaired to a structural condition equal to, or greater than, that which existed prior to construction activities. In the City of Marina, the construction in the city rights-way must comply with the City's design standards, including restoration of the streets from curb to curb, as applicable. In the City of Monterey, asphalt pavement of full travel lanes will be resurfaced without seams along wheel or bike paths.	All components	Prior to project construction, after project construction	MRWPCA and CalAm construction contractors	After project construction	MRWPCA, CalAm, and local jurisdictions
Impact TR-4: Construction Parking Interference	**Mitigation Measure TR-4**: **Construction Parking Requirements**. Prior to commencing project construction, the construction contractor(s) shall coordinate with the potentially affected jurisdictions to identify designated worker parking areas that would avoid or minimize parking displacement in congested areas of Marina, Seaside, and downtown Monterey. The contractors shall provide transport between the designated parking location and the construction work areas. The construction contractor(s) shall also provide incentives for workers that carpool or take public transportation to the construction work areas. The engineering and construction design plans shall specify that contractors limit time of construction within travel lanes and public parking spaces and provide information to the public about locations of alternative spaces to reduce parking disruptions.	Product Water Conveyance: RUWAP Pipeline Alignment in Marina and Seaside and CalAm Distribution System: Alternative Monterey Pipeline	Prior to project construction	MRWPCA and CalAm construction contractor	During project construction	MRWPCA City of Marina, City of Seaside, City of Monterey

EXHIBIT D – PURE WATER MONTEREY/GROUNDWATER REPLENISHMENT PROJECT

CALIFORNIA STATE LANDS COMMISSION STATEMENT OF FINDINGS

1.0 INTRODUCTION

The California State Lands Commission (CSLC), acting as a responsible agency under the California Environmental Quality Act (CEQA), makes these findings to comply with CEQA as part of its discretionary approval to authorize issuance of a General Lease – Public Agency Use, to Monterey Regional Water Pollution Control Agency (MRWPCA), for use of sovereign lands associated with the proposed Pure Water Monterey/Groundwater Replenishment Project (Project). (See generally Pub. Resources Code, § 21069; State CEQA Guidelines, § 15381.)[1] The CSLC has jurisdiction and management authority over all ungranted tidelands, submerged lands, and the beds of navigable lakes and waterways. The CSLC also has certain residual and review authority for tidelands and submerged lands legislatively granted in trust to local jurisdictions. (Pub. Resources Code, §§ 6301, 6306, 6009, subd. (c).) All tidelands and submerged lands, granted or ungranted, as well as navigable lakes and waterways, are subject to the protections of the common law Public Trust.

The CSLC is a responsible agency under CEQA for the Project because the CSLC must approve the installation of a force main pipeline (pipeline) under the Salinas River for the Project to move forward and because the MRWPCA, as the CEQA lead agency, has the principal responsibility for approving the Project and has completed its environmental review under CEQA. The MRWPCA analyzed the environmental impacts associated with the Project in a Final Environmental Impact Report (EIR) (State Clearinghouse [SCH] No. 2013051094) and, in October 2015, certified the EIR and adopted a Mitigation Monitoring Program (MMP) and Findings, and a Statement of Overriding Considerations.

The overall Project would create a reliable source of water supply from: 1) purified recycled water for recharge of the Seaside Groundwater Basin; and 2) recycled water to augment the existing Castroville Seawater Intrusion Project's agricultural irrigation supply.

The MRWPCA determined that the Project could have significant environmental effects on the following environmental resources:

- Aesthetics;
- Air Quality and Greenhouse Gas;
- Biological Resources: Fisheries;

[1] CEQA is codified in Public Resources Code section 21000 et seq. The State CEQA Guidelines are found in California Code of Regulations, title 14, section 15000 et seq.

- Biological Resources: Terrestrial;
- Cultural and Paleontogical Resources;
- Energy and Mineral Resources;
- Geology, Soils, and Seismicity;
- Hazards and Hazardous Materials;
- Hydrology and Water Quality: Surface Water;
- Land Use, Agriculture, and Forest Resources;
- Marine Biological Resources;
- Noise and Vibration;
- Public Services, Utilities, and Recreation; and
- Traffic and Transportation.

Of the 14 resources areas noted above, Project components within the CSLC's jurisdiction (installation of a pipeline under the Salinas River) could have significant environmental effects on nine of the resource areas, as follows:

- Air Quality and Greenhouse Gas;
- Biological Resources: Fisheries;
- Biological Resources: Terrestrial;
- Cultural and Paleontogical Resources;
- Energy and Mineral Resources;
- Hydrology and Water Quality: Surface Water;
- Marine Biological Resources;
- Noise and Vibration; and
- Public Services, Utilities, and Recreation.

In certifying the Final EIR and approving the Project, the MRWPCA imposed various mitigation measures for Project-related significant effects on the environment as conditions of Project approval and concluded that Project-related impacts would be substantially lessened with implementation of these mitigation measures. However, even with the integration of all feasible mitigation, the MRWPCA concluded in the EIR that some of the identified impacts would remain significant. As a result, the MRWPCA adopted a Statement of Overriding Considerations to support its approval of the Project despite the significant and unavoidable impacts (Attachment D-1). The MRWPCA determined that, after mitigation, the Project may still have significant impacts due to Construction Noise (Alternative Monterey Pipeline) and Construction Noise That Exceeds or Violate Local Standards (Tembladero Slough). The installation of the pipeline would take place in the Blanco Drain Diversion area. In this area of the Project the impacts due to noise and vibration were determined to be less than significant with mitigation; therefore, any significant and unavoidable impacts are outside the jurisdiction and approval authority of the CSLC, and a Statement of Overriding Considerations is not required by the CSLC.

As a responsible agency, the CSLC complies with CEQA by considering the EIR and reaching its own conclusions on whether, how, and with what conditions to approve a project. In doing so, the CSLC may require changes in a project to lessen or avoid the

effects, either direct or indirect, of that part of the project which the CSLC will be called on to carry out or approve. In order to ensure the identified mitigation measures and/or Project revisions are implemented, the CSLC adopts the Mitigation Monitoring Program (MMP) as set forth in Exhibit C as part of its Project approval.

2.0 FINDINGS

The CSLC's role as a responsible agency affects the scope of, but not the obligation to adopt, findings required by CEQA. Findings are required under CEQA by each "public agency" that approves a project for which an EIR has been certified that identifies one or more significant impacts on the environment (Pub. Resources Code, § 21081, subd. (a); State CEQA Guidelines, § 15091, subd. (a).) Because the EIR certified by the MRWPCA for the Project identifies potentially significant impacts that fall within the scope of the CSLC's approval, the CSLC makes the Findings set forth below as a responsible agency under CEQA. (State CEQA Guidelines, § 15096, subd. (h);*Riverwatch v. Olivenhain Mun. Water Dist.* (2009) 170 Cal.App.4th 1186, 1202, 1207..)

While the CSLC must consider the environmental impacts of the Project as set forth in the EIR, the CSLC's obligation to mitigate or avoid the direct or indirect environmental impacts of the Project is limited to those parts which it decides to carry out, finance, or approve (Pub. Resources Code, § 21002.1, subd. (d); State CEQA Guidelines, §§ 15041, subd. (b), 15096, subds. (f)-(g).) Accordingly, because the CSLC's exercise of discretion involves only issuing a General Lease – Public Agency Use for this Project, the CSLC is responsible for considering only the environmental impacts related to lands or resources subject to the CSLC's jurisdiction. With respect to all other impacts associated with implementation of the Project, the CSLC is bound by the legal presumption that the EIR fully complies with CEQA.

The CSLC has reviewed and considered the information contained in the Project EIR. All significant adverse impacts of the Project identified in the EIR relating to the CSLC's approval of a General Lease – Public Agency Use, which would allow the installation of a pipeline under the Salinas River, are included herein and organized according to the resource affected.

These Findings, which reflect the independent judgment of the CSLC, are intended to comply with CEQA's mandate that no public agency shall approve or carry out a project for which an EIR has been certified that identifies one or more significant environmental effects unless the agency makes written findings for each of those significant effects. Possible findings on each significant effect are:

(1) Changes or alterations have been required in, or incorporated into, the Project that avoid or substantially lessen the significant environmental effect as identified in the Final EIR.

(2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the CSLC. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

(3) Specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR.[2]

A discussion of supporting facts follows each Finding.

- Whenever Finding (1) occurs, the mitigation measures that lessen the significant environmental impact are identified in the facts supporting the Finding.
- Whenever Finding (2) occurs, the agencies with jurisdiction are specified. These agencies, within their respective spheres of influence, have the responsibility to adopt, implement, and enforce the mitigation discussed.

These Findings are supported by substantial evidence contained in the EIR and other relevant information provided to the CSLC or existing in its files, all of which is contained in the administrative record. The mitigation measures are briefly described in these Findings; more detail on the mitigation measures is included in the Final EIR.

The CSLC is the custodian of the record of proceedings upon which its decision is based. The location of the CSLC's record of proceedings is in the Sacramento office of the CSLC, 100 Howe Avenue, Suite 100-South, Sacramento, CA 95825.

A. SUMMARY OF FINDINGS

Based on public scoping, there are no environmental issue areas on which the proposed Project would have No Impact. The EIR subsequently identified the following impacts as Less Than Significant:

- Hydrology and Water Quality: Groundwater;
- Population and Housing; and
- Water Supply and Wastewater Systems.

For the remaining potentially significant effects, the Findings are organized by significant impacts within the EIR issue areas as presented below.

B. IMPACTS REDUCED TO LESS THAN SIGNIFICANT LEVELS WITH MITIGATION

The impacts identified in the table below were determined in the Final EIR to be potentially significant absent mitigation; after application of mitigation, however, the impacts were determined to be less than significant. For the full text of each mitigation measure (MM), please refer to Exhibit C, Attachment C-1.

[2] See Public Resources Code section 21081, subdivision (a) and State CEQA Guidelines section 15091, subdivision (a).

1. Air Quality and Greenhouse Gas	AQ-1; AQ-C
2. Biological Resources: Fisheries	BF-1
3. Biological Resources: Terrestrial	BT-1; BT-2
4. Cultural and Paleontogical Resources	CR-2
5. Energy and Mineral Resources	EN-1
6. Hydrology/Water Quality: Surface Water	HS-C
7. Marine Biological Resources	MR-C
8. Noise and Vibration	NV-2
9. Public Services, Utilities, and Recreation	PS-3

1. AIR QUALITY AND GREENHOUSE GAS

CEQA FINDING NO. AQ-1

Impact: **Impact AQ-1. Construction Criteria Pollutant Emissions.** Construction of the Proposed Project would result in emissions of criteria pollutants.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Construction of the proposed Project would result in emissions of criteria pollutants, specifically PM10, that may conflict with or obstruct implementation of the applicable air quality plan and may violate an air quality standard or contribute substantially to an existing or projected air quality violation in a region that is nonattainment under State ambient air quality standards. Implementation of a Construction Fugitive Dust Control Plan is anticipated to reduce on-site fugitive dust emissions to below the Monterey Bay Unified Air Pollution Control District emission thresholds for on-site PM10 emissions. Implementation of **MM AQ-1** has been incorporated into the Project to reduce this impact to a less than significant level.

MM AQ-1: Construction Fugitive Dust Control Plan.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA FINDING NO. AQ-C (CUMMULATIVE)

Impact: **Impact AQ-C. Air Quality: Overall Regional PM10 Emissions.** Localized air pollutant emissions from cumulative projects may potentially impact sensitive receptors.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The Project would potentially make a considerable contribution to significant cumulative regional emissions of PM10. Implementation of a Construction Fugitive Dust Control Plan is anticipated to reduce on-site fugitive dust emissions to below the Monterey Bay Unified Air Pollution Control District emission thresholds for on-site PM10 emissions. With the implementation of **MM AQ-1**, the impact would be reduced to less than significant and the Project would not make a considerable contribution to a significant cumulative impact.

MM AQ-1: Construction Fugitive Dust Control Plan.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

2. BIOLOGICAL RESOURCES: FISHERIES

CEQA FINDING NO. BF-1	
Impact:	**Impact BF-1. Habitat Modification Due to Construction of Diversion Facilities.** Construction would result in a potentially significant impact to potential aquatic habitat for the federally threatened South-Central California Coastal steelhead distinct population segment species, if present, in the Salinas River.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Installation of the pipeline under the Salinas River by horizontal directional drilling could indirectly result in degradation of habitat for endangered or threatened fish species should a frac-out occur. With implementation of **MM BF-1a and MM BT-2c**, potential impacts to migrating steelhead would be avoided and the impact reduced to a less than significant level.

MM BF-1a: Construction during Low Flow Season.

MM BT-2c: Avoidance and Minimization of Construction Impacts Resulting from Horizontal Directional Drilling under the Salinas River.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

3. BIOLOGICAL RESOURCES: TERRESTRIAL

CEQA FINDING NO. BT-1

Impact: **Impact BT-1. Construction Impacts to Special-Status Species and Habitat.** The Project may adversely affect, either directly or indirectly, special-status plant and wildlife species and their habitat within the pipeline installation area.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The horizontal directional drilling of the pipeline under the Salinas River would require work areas approximately 40 feet by 60 feet on each side of the river. Therefore, this portion of the Project may adversely affect, either directly or indirectly, special-status plant and wildlife species and their habitat within the installation area due to use of heavy equipment and other construction activities. The proposed mitigation will incorporate pre-construction surveys, educational programs, monitoring, protection, and restoration of habitat. Implementation of **MM BT-1a, MM BT-1b, MM BT-1c, MM BT-1h, BT-1i, MM BT-1k, MM BT-1p, and MM BT-1q** has been incorporated into the Project to reduce this impact to a less than significant level.

MM BT-1a: Implement Construction Best Management Practices.

MM BT-1b: Implement Construction-Phase Monitoring.

MM BT-1c: Implement Non-Native, Invasive Species Controls.

MM BT-1h: Implementation of Mitigation Measures BT-1a and BT-1b to Mitigate Impacts to the Monterey Ornate Shrew, Coast Horned Lizard, Coast Range Newt, Two-Striped Garter Snake, and Salinas Harvest Mouse.

MM BT-1i: Conduct Pre-Construction Surveys for Monterey Dusky- Footed Woodrat.

MM BT-1k: Conduct Pre-Construction Surveys for Protected Avian Species, including, but not limited to, white-tailed kite and California horned lark.

MM BT-1p: Avoid and Minimize Impacts to Western Pond Turtle.

MM BT-1q: Avoid and Minimize Impacts to California Red-Legged Frog.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

CEQA FINDING NO. BT-2

Impact: **Impact BT-2. Construction Impacts to Sensitive Habitats.** Project construction may adversely affect sensitive habitats, including the Salinas River and adjacent riparian areas.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Horizontal directional drilling for installation of the pipeline under the Salinas River may result in direct and indirect impacts to sensitive habitats that could result in the direct loss of habitat, soil compaction, root damage, erosion, frac-out, and introduction and spread of nonnative, invasive species.The proposed mitigation would protect sensitive habitats by incorporating avoidance, protection, and restoration. In addition, a plan will be prepared that would avoid or reduce accidental impacts resulting from horizontal directional drilling. Implementation of **MM BT-2a and MM BT-2c** has been incorporated into the Project to reduce this impact to a less than significant level.

MM BT-2a: Avoidance and Minimization of Impacts to Riparian Habitat and Wetland Habitats.

MM BT-2c: Avoidance and Minimization of Construction Impacts Resulting from Horizontal Directional Drilling under the Salinas River.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

4. CULTURAL AND PALEONTOGICAL RESOURCES

CEQA FINDING NO. CR-2

Impact: **Impact CR-2. Construction Impacts on Archaeological Resources or Human Remains.** Construction may result in substantial adverse impacts to unknown archaeological resources and/or human remains.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

There is a potential for unknown historic-era subsurface archaeological resources to be discovered, and inadvertently damaged or destroyed during Project construction. In addition, there is the possibility of inadvertently uncovering human remains during construction. The proposed mitigation would protect unanticipated archaeological

resources and notify appropriate Native American contacts should any resources be encountered. Implementation of **MM CR-2b and MM CR-2C** has been incorporated into the Project to reduce this impact to a less than significant level.

MM CR-2b: Discovery of Archaeological Resources or Human Remains.

CSLC Addition:

Commission staff shall be notified of any significant cultural resources or paleontological specimens discovered on lands under the jurisdiction of the Commission. The final disposition of archaeological and historical resources and paleontological specimens from such lands must be approved by the Commission.

If the human remains are Native American and are found on lands under the jurisdiction of the Commission, Commission staff shall also be notified to address any landowner responsibilities.

MM CR-2C: Native American Notification.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

5. ENERGY AND MINERAL RESOURCES

CEQA FINDING NO. EN-1	
Impact:	**Impact EN-1. Construction Impacts due to Temporary Energy Use.** Project construction could use large amounts of fuel or energy in a wasteful or inefficient manner
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Construction could result in wasteful or inefficient use of energy if equipment is not maintained or if haul trips are not planned efficiently. The proposed mitigation would ensure construction activities are conducted in a fuel-efficient manner. Implementation of **MM EN-1** has been incorporated into the Project to reduce this impact to a less than significant level.

MM EN-1: Construction Equipment Efficiency Plan.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

6. HYDROLOGY AND WATER QUALITY: SURFACE WATER

CEQA FINDING NO. HS-C (CUMMULATIVE)

Impact: **Impact HS-C. Cumulative Impacts to Marine Surface Waters.** The Project may make a considerable contribution to significant marine water quality cumulative impacts.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The desalination discharges would result in a significant impact to marine water quality. The proposed mitigation would involve employing one or more design features and/or operational measures prior to operating the desalination plant. The design features and operational measures include short-term storage and release of brine from the desalination plant, treatment of the source water and/or brine discharge(s), and biologically active filtration at the Regional Treatment Plant. With implementation of **MM HS-C**, the impact would be reduced to less than significant and the Project would not make a considerable contribution to a significant cumulative impact.

MM HS-C: Implement Measures to Avoid Exceedances over Water Quality Objectives at the Edge of the Zone of Initial Dilution.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

7. MARINE BIOLOGICAL RESOURCES

CEQA FINDING NO. MR-C (CUMMULATIVE)

Impact: **Impact MR-C. Cumulative Impacts to Marine Marine Biological Resources.** The Project may make a considerable contribution to marine water quality significant cumulative impacts, which may adversely affect marine biological resources.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

The desalination discharges would result in a significant impact to marine water quality, which in turn, could adversely affect marine biological resources. The proposed mitigation would involve employing one or more design features and/or operational measures prior to operating the desalination plant. The design features and operational

measures include short-term storage and release of brine from the desalination plant, treatment of the source water and/or brine discharge(s), and biologically active filtration at the Regional Treatment Plant. With implementation of **MM HS-C**, the impact would be reduced to less than significant and the Project would not make a considerable contribution to a significant cumulative impact

MM HS-C: Implement Measures to Avoid Exceedances over Water Quality Objectives at the Edge of the Zone of Initial Dilution.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

8. NOISE AND VIBRATION

CEQA FINDING NO. NV-2	
Impact:	**Impact NV-2. Construction Noise that Exceeds or Violate Local Standards**. Construction activity would result in a temporary increase in noise levels in excess of standards established in the local general plans and/or could violate local regulations.
Finding(s):	(1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Construction noise associated with the horizontal directional drilling for installation of the pipeline under the Salinas River as part of the Blanco Drain Diversion could conflict with Monterey County Code Section 10.60.30 as some of the construction equipment would result in noise levels above 85 A-weighted decibels (dBA) at 50 feet, and construction would occur within 2,500 of a residence within the unincorporated area of the County. The proposed mitigation would ensure consistency with General Plan Policy S-7.10 by requiring that construction equipment have properly operating mufflers and that stationary noise equipment be located as far as possible from sensitive receptors. **MM NV-2a** would decrease noise levels to below 85 dBA at 50 feet, which would reduce the impact to a less than significant level.

MM NV-2a: Construction Equipment.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

9. PUBLIC SERVICES, UTILITIES, AND RECREATION

CEQA FINDING NO. PS-3

Impact: **Impact PS-3. Construction Solid Waste Policies and Regulations.** Construction could potentially conflict with State and local statutes, policies, and regulations related to solid waste.

Finding(s): (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effect as identified in the EIR.

FACTS SUPPORTING THE FINDING(S)

Construction debris such as spoils, rock, and other excavated materials may result from the installation of the pipeline under the Salinas River. While suitable soil excavated during construction could be used to backfill trenches and restore work areas, if these excavated materials were disposed at a landfill, the Project could potentially be out of compliance with State and local solid waste programs, resulting in a significant impact. The proposed mitigation would require the preparation and implementation of a construction waste reduction and recycling plan identifying the types of debris the Project would generate and describing the manner in which these waste streams would be handled to comply with State and local solid waste statutes and regulations. Implementation of **MM PS-3** would reduce the impact to a less than significant level.

MM PS-3: Construction Waste Reduction and Recycling Plan.

LEVEL OF SIGNIFICANCE AFTER MITIGATION. With the mitigation described above, this impact is reduced to a less than significant level.

ATTACHMENT D-1

Monterey Regional Water Pollution Control Agency
Findings Regarding Alternatives and
Statement of Overriding Considerations

overriding considerations supporting approval of the Project, and its Project approval. The State Clearinghouse number for the Project is SCH#2013051094.

A Draft Environmental Impact Report ("Draft EIR") was released for public and agency review on April 22, 2015. The Draft EIR assesses the potential environmental effects of implementation of the Project, identifies means to eliminate or reduce potential adverse impacts, and evaluates a reasonable range of alternatives to the Project.

The Final EIR is comprised of the Draft EIR together with one additional volume that includes the comments on the Draft EIR submitted by interested public agencies, organizations, and members of the public; written responses to the environmental issues raised in those comments; revisions to the text of the Draft EIR reflecting changes made in response to comments and other information; and other minor changes to the text of the Draft EIR. The Final EIR is hereby incorporated in this document by reference.

I. CERTIFICATION OF THE FINAL EIR

The MRWPCA Board (the "Board") certifies that it has been presented with the Final EIR and that it has reviewed and considered the information contained in the Final EIR prior to making the following findings and statement of overriding considerations in Section II, below.

Pursuant to CEQA Guidelines section 15090 (Title 14 of the California Code of Regulations, section 15090) the Board certifies that the Final EIR has been completed in compliance with CEQA and the CEQA Guidelines. The Board certifies the Final EIR for the Project as described above.

The Board further certifies that the Final EIR reflects its independent judgment and analysis.

II. FINDINGS

Having received, reviewed, and considered the Final EIR and other information in the record of proceedings, the Board hereby adopts the following findings in compliance with CEQA and the CEQA Guidelines:

Part A: Findings regarding the environmental review process and the contents of the Final EIR.

Part B: Findings regarding the significant environmental impacts of the Project and the mitigation measures for those impacts identified in the Final EIR and adopted as conditions of approval, as well as the reasons that some potential mitigation measures are rejected.

Part C: Findings regarding alternatives and the reasons that alternatives are rejected.

Part D: Statement of Overriding Considerations determining that the benefits of implementing the Project outweigh the significant unavoidable environmental impacts that will result and therefore justify approval of the Project despite such impacts.

The Board certifies that these findings are based on full appraisal of all viewpoints, including all comments received up to the date of adoption of these findings, concerning the environmental issues identified and discussed in the Final EIR. The Board adopts the findings and the statement in Parts A through D for Project.

In addition to the findings regarding environmental impacts, alternatives and overriding considerations, Part E, below, identifies the custodian and location of the record of proceedings, as required by CEQA.

Part F describes the Mitigation Monitoring and Reporting Program for the Project. As described in Part F, the Board hereby adopts the Mitigation Monitoring and Reporting Program as set forth in Exhibit B to these findings.

Part G, below, summarizes the findings and determinations regarding the Project.

A. Environmental Review Process

1. Notice of Preparation and Scoping Meeting

On May 30, 2013, the MRWPCA issued a Notice of Preparation announcing the intended preparation of the Draft EIR and describing its proposed scope. The NOP had a 30-day review period until July 2, 2013. A supplement to the NOP was prepared and circulated December 9, 2014 through January 8, 2015 to reflect updates to the Project that had occurred since the original NOP was issued. The MRWPCA received written responses to the NOPs from agencies, organizations and individuals.

The MRWPCA held a public scoping meeting on Thursday, June 18, 2013 from 6:00 to 8:00 PM at the Oldemeyer Center located at 986 Hilby Avenue, Seaside, CA 93955 to present the Project to the public and agencies and to solicit input as to the scope and content of the EIR. Public notices were placed in local newspapers informing the general public of the scoping meetings. The MRWPCA received oral comments at the public Scoping Meeting. Appendix A to the Draft EIR provides a summary of all written comments received in response to the initial and supplemental NOPs and oral comments received at the public Scoping Meeting.

2. Preparation of the EIR

The MRWPCA completed the Draft EIR for the Project and, beginning on April 22, 2015, the MRWPCA made the Draft EIR available for review and comment. A notice of availability and notice of completion of the Draft EIR was sent to the State Clearinghouse/ Governor's Office of Planning and Research. A notice of availability also was published in the *Monterey County Herald* and the *Salinas Californian*. A hard copy of the Draft EIR was made available for review during normal business hours at the MRWPCA Administrative Office, 5 Harris Court, Bldg. D, Monterey, CA 93940 and at the MPWMD Offices, 5 Harris Court, Bldg. G, Monterey, CA 93940. The Draft EIR was available online at the GWR Project website at: www.purewatermonterey.org. The Draft EIR was also available at the following libraries: Seaside Public Library, Marina Public Library, Salinas Public Libraries, Castroville Public Library, Monterey Public Library, Carmel Valley Public Library, and Harrison Memorial Library (Carmel).

The period for receipt of comments on the Draft EIR remained open until June 5, 2015. During the 45-day Draft EIR review period, the MRWPCA held two noticed public meetings to provide information and answer questions about the Project and the EIR. The first meeting was held on May 20, 2015 from 6:00 p.m. to 8:00 p.m. at the Oldemeyer Center (986 Hilby Avenue, Seaside, CA 93955). The second public meeting was held on May 21, 2015 from 4:00 p.m. to 6:00 p.m. at Hartnell College (411 Central Avenue, Salinas, CA 93901). Spanish translation was available, and both venues were accessible under the Americans with Disabilities Act (ADA). The notice of availability contained information about the meetings.

During the comment period, the MRWPCA received written comments from state and local agencies, organizations and individuals. A total of 26 comment letters were received on the Draft EIR during the public review process. Three letters from key agencies were received after the close of the review period and are included in the Final EIR.

The Final EIR was completed and made available to public agencies and members of the public on September 25, 2015.

The Final EIR contains all of the comments received during and immediately after the public comment period, together with written responses to significant environmental issues raised in those comments, which were prepared in accordance with CEQA and the CEQA Guidelines.

The Board finds and determines that the Final EIR provides adequate, good faith, and reasoned responses to all comments raising significant environmental issues.

3. Absence of Significant New Information

CEQA Guidelines Section 15088.5 requires a lead agency to recirculate an EIR for further review and comment when significant new information is added to the EIR after public notice is given of the availability of the draft EIR but before certification of the final EIR. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project proponent declines to implement. The Guidelines provide examples of significant new information under this standard. Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.

The Board recognizes that the Final EIR incorporates information obtained by the MRWPCA since the Draft EIR was completed, and contains additions, clarifications, modifications, and other changes. With respect to this information, the Board finds as follows:

***Changes to Mitigation Measures*.** As described in Chapter 5 of the Final EIR (Changes to the Draft EIR) and in the responses to comments, several mitigation measures have been modified, including Mitigation Measures AE-3, AE-4, AQ-1, BF-1a through BF-1c, BF-2a/Alternate BF-2a, BT-1a, BT-2c, HS-4, HS-C/MR-C, NV-1d, NV-2b, TR-2, and TR-3. Language within Mitigation Measures CR-1 and CR-2a has been modified, for consistency with the discussion in the Draft EIR on pages 6-41 and 6-42 regarding the applicability of Impacts CR-1 and CR-2 to the Alternative Monterey Pipeline. The Board finds that these changes to the

mitigation measures in the Final EIR augment the mitigation measures as proposed in the Draft EIR, strengthen the effectiveness of the proposed mitigation measures, respond to agency input, and/or enhance their clarity, but do not cause any new or more severe environmental impacts. Therefore, in accordance with CEQA and the CEQA Guidelines, no recirculation of the EIR is necessary based on the changes and additions to the mitigation measures in the Final EIR.

Other Changes. Various minor changes and edits have been made to the text and tables of the Draft EIR, as described in Chapter 5 of the Final EIR. These changes are generally of an administrative nature such as correcting typographical errors, making minor adjustments to the data, and adding or changing certain phrases to improve readability. The Board finds that these changes are of a minor, non-substantive nature and do not require recirculation of the EIR.

In addition to the changes and corrections described above, the Final EIR provides additional information in response to comments and questions from public agencies, private organizations, and individuals. The Board finds that this additional information does not constitute significant new information requiring recirculation, but rather that the additional information clarifies or amplifies an adequate EIR. The public has not been deprived of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible project alternative or mitigation measure

Recirculation is required in four situations. Here, the Board finds that the additional information, including the changes described above, does not show that:

(1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

(2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.

(4) The Draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based on the foregoing, and having reviewed the information contained in the Final EIR and in the record of the MRWPCA's proceedings, including the comments on the Draft EIR and the responses thereto, and the above-described information, the Board hereby finds that no significant new information has been added to the Final EIR since public notice was given of the availability of the Draft EIR that would require recirculation of the EIR. Therefore, in accordance with CEQA Guidelines Section 15088.5(b), no recirculation of the Draft EIR is required.

4. Differences of Opinion Regarding the Impacts of the Project

In making its determination to certify the Final EIR and to approve the Project, the Board recognizes that a range of technical and scientific opinion exists with respect to certain environmental issues. The Board has acquired an understanding of the range of this technical and scientific opinion by its review of the Draft EIR, the comments received on the Draft EIR and the responses to those comments in the Final EIR, as well as testimony, letters, and reports regarding the Final EIR and its own experience and expertise in these environmental issues. The Board has reviewed and considered, as a whole, the evidence and analysis presented in the Draft EIR, the evidence and analysis presented in the comments on the Draft EIR, the evidence and analysis presented in the Final EIR, the information submitted on the Final EIR, and the reports prepared by the experts who prepared the EIR, by the MRWPCA's consultants, and by staff, addressing those comments. The Board has gained a comprehensive and well-rounded understanding of the environmental issues presented by the Project. In turn, this understanding has enabled the Board to make its decisions after weighing and considering the various viewpoints on these important issues. The Board accordingly certifies that its findings are based on full appraisal of all of the evidence contained in the Final EIR, as well as the evidence and other information in the record addressing the Final EIR.

B. Impacts and Mitigation Measures

These findings provide the written analysis and conclusions of the Board regarding the environmental impacts of the Project and the mitigation measures identified by the Final EIR and adopted by the Board as conditions of approval for the Project.

In making these findings, the Board has considered the opinions of other agencies and members of the public, including opinions that disagree with some of the analysis and significance thresholds used in the EIR. The Board finds that the determination of significance thresholds is a judgment that is within the discretion of the Board; the significance thresholds used in the EIR are supported by substantial evidence in the record, including the expert opinion of the EIR preparers and MRWPCA staff; and the significance thresholds used in the EIR provide reasonable and appropriate means of assessing the significance of the adverse environmental effects of the Project.

In particular, the EIR relied on significance criteria for evaluating impacts that are tailored to this type of project. The criteria used in this EIR to determine whether an impact is or is not "significant" are based on (a) CEQA-stipulated "mandatory findings of significance" listed in CEQA Guidelines section 15065; (b) the relationship of the project effect to the adopted policies, ordinances and standards of the MRWPCA and of responsible agencies; and (c) commonly accepted practice and the professional judgment of the EIR authors and MRWPCA staff.

1. Findings on the Project's Environmental Impacts.

Exhibit A, Summary of Impacts and Mitigation Measures for the Staff Recommended Alternative, attached to these findings and incorporated herein by reference summarizes the environmental determinations of the Final EIR about the Project's significant impacts before and

after mitigation. This exhibit does not attempt to describe the full analysis of each environmental impact contained in the Final EIR. Instead, Exhibit A provides a summary description of each significant impact, describes the applicable mitigation measures identified in the Final EIR and adopted by the Board where the measure is within the Board's jurisdiction to adopt, and states the Board's findings on the significance of each impact after imposition of the adopted mitigation measures. A full explanation of these environmental findings and conclusions can be found in the Final EIR, and these findings hereby incorporate by reference the discussion and analysis in the Final EIR supporting the Final EIR's determinations regarding the Project's impacts and mitigation measures designed to address those impacts. In making these findings, the Board ratifies, adopts, and incorporates the analysis and explanation in the Final EIR, and ratifies, adopts, and incorporates in these findings the determinations and conclusions of the Final EIR relating to environmental impacts and mitigation measures, except to the extent any such determinations and conclusions are specifically and expressly modified by these findings.

2. Adoption of Project Design Features and Mitigation Measures as Conditions of Approval.

The Board adopts, and incorporates as conditions of approval of the Project, the mitigation measures set forth in the Mitigation Monitoring and Reporting Program attached to these findings as Exhibit B to reduce or avoid the potentially significant and significant impacts of the Project. In adopting these mitigation measures, the Board intends to adopt each of the mitigation measures recommended for approval by the Final EIR that applies to a component of the Project that would be constructed by or funded by the Board. Accordingly, in the event an applicable mitigation measure recommended in the Final EIR has inadvertently been omitted from Exhibit B, such mitigation measure is hereby adopted and incorporated in the findings below by reference. In addition, in the event the language describing a mitigation measure set forth in Exhibit B fails to accurately reflect the mitigation measures in the Final EIR due to a clerical error, the language of the mitigation measure as set forth in the Final EIR shall control, unless the language of the mitigation measure has been specifically and expressly modified by these findings.

The Board hereby finds that the adopted mitigation measures are changes or alterations that have been required in, or incorporated into, the Project which mitigate or avoid significant effects on the environment.

- Some of the mitigation measures identified in the EIR cannot be fully implemented by the Board because the measures apply to a Project component that the Board does not control. The Alternative Monterey Pipeline would be implemented by CalAm and is not subject to regulatory approvals by MRWPCA. CalAm has confirmed that it would implement all of the mitigation measures that the EIR identifies for the Alternative Monterey Pipeline, including the following: AE-2; AQ-1; BT-1a; BT-1k; BT-1m; CR-1; CR-2(a); CR-2(b); CR-2(c); EN-1; HH-2(a); HH-2(b); HH-2(c); LU-2; NV-1(b); NV-1(c); PS-3; TR-2; TR-3; and TR-4.

The Board hereby finds that these mitigation measures are within the jurisdiction of other public agencies issuing regulatory approvals to CalAm, and can and should be approved by those other agencies.

3. Findings on Additional Suggested Mitigation Measures.

In several comments on the Draft EIR, various measures were suggested by commenters as proposed additional mitigation measures or modifications to the mitigation measures identified by the EIR. As described above, several of the EIR's mitigation measures were modified in response to such comments. Other comments requested minor modifications in mitigation measures identified in the Draft EIR, requested mitigation measures for impacts that were less than significant, or requested additional mitigation measures for impacts as to which the Draft EIR identified mitigation measures that would reduce the identified impact to a less than significant level; these requests are declined as unnecessary.

With respect to the additional measures suggested by commenters that were not added to the Final EIR, the Board hereby adopts and incorporates by reference the reasons set forth in the responses to comments contained in the Final EIR as its grounds for rejecting adoption of these mitigation measures.

C. Basis for the Board's Decision to Approve the Project (as Modified)

1. Summary of Discussion of Alternatives in the Final EIR

The Final EIR evaluates a number of potential alternatives to the Project. The EIR examines the environmental impacts of each alternative in comparison with the Project and the relative ability of each alternative to satisfy project objectives.

The EIR also describes the criteria used to identify a range of reasonable alternatives for review in the EIR and describes proposals that the MRWPCA concluded did not merit additional, more-detailed review because they did not present viable alternatives to the Project.

2. The Board's Findings Relating to Alternatives

In making these findings, the Board certifies that it has independently reviewed and considered the information on alternatives provided in the Final EIR, including the information provided in comments on the Draft EIR and the responses to those comments in the Final EIR. The Final EIR's discussion and analysis of these alternatives is not repeated in these findings, but the discussion and analysis of the alternatives in the Final EIR is incorporated in these findings by reference.

The Final EIR describes and evaluates in detail several alternatives to the Project. As set forth in section B above, the Board has adopted mitigation measures that mitigate the significant environmental effects of the Project. As explained in section D of these findings, while these mitigation measures will not mitigate all Project impacts to a less than significant level, they will mitigate those impacts to a level that the Board finds is acceptable. The Board finds that only the Project would satisfy all of the Project Objectives. The Board finds that the remaining alternatives are unable to satisfy the project objectives to the same degree as the Project. The

Board further finds that, on balance, none of the remaining alternatives has environmental advantages over the Project that are sufficiently great to justify approval of such an alternative instead of the Project, in light of each such alternative's inability to satisfy the project objectives to the same degree as the Project. Accordingly, the Board has determined to approve the Project instead of approving one of the remaining alternatives.

In making this determination, the Board finds that when compared to the other alternatives described and evaluated in the Final EIR, the Project, as mitigated, provides a reasonable balance between fully satisfying the project objectives and reducing potential environmental impacts to an acceptable level. The Board further finds and determines that the Project should be approved, rather than one of the other alternatives, for the reasons set forth below.

a. Description of Project Objectives

The primary objective of the Project is to replenish the Seaside Groundwater Basin with 3,500 AFY of purified recycled water to replace a portion of CalAm's water supply as required by state orders. To accomplish this primary objective, the Project would need to meet the following objectives:

- Be capable of commencing operation, or of being substantially complete, by the end of 2016 or, if after 2016, no later than necessary to meet CalAm's replacement water needs;
- Be cost-effective such that the project would be capable of supplying reasonably-priced water; and
- Be capable of complying with applicable water quality regulations intended to protect public health.

Secondary objectives of the Project include the following:

- Provide additional water to the Regional Treatment Plant that could be used for crop irrigation through the Salinas Valley Reclamation Plant and Castroville Seawater Intrusion Project system;
- Develop a drought reserve to allow the increased use of Project source waters as crop irrigation within the area served by the Castroville Seawater Intrusion Project during dry years
- Assist in preventing seawater intrusion in the Seaside Groundwater Basin;
- Assist in diversifying Monterey County's water supply portfolio.

b. Discussion and Findings Relating to the Alternatives Evaluated in the Draft EIR

Chapter 6 of the Draft EIR provides a full discussion of the following alternatives, which are summarized below:

- No Project

- Alternatives to Project
  - Reduced Seaside Basin Replenishment Alternative
  - Component-by-component alternatives for Source Water Diversion and Use, for Product Water Conveyance, and for CalAm Distribution System Pipelines
  - Three overall alternatives to the Project were considered that combined component-by-component alternatives into overall alternatives:
    - Alternative A: Reduced Seaside Basin Replenishment and Alternative Monterey Pipeline
    - Alternative B: Reduced Source Water Alternative #2 (No Tembladero Slough) and Alternative Monterey Pipeline
    - Alternative C: Reduced Source Water Alternative #7 (Salinas Source Waters Only) and Alternative Monterey Pipeline

No Project Alternative.

Under CEQA, a "No-Project Alternative" compares the impacts of proceeding with a proposed project with the impacts of not proceeding with the proposed project. A No-Project Alternative describes the environmental conditions in existence at the time the Notice of Preparation was published, along with a discussion of what would be reasonably expected to occur in the foreseeable future, based on current plans and consistent with available infrastructure and community services.

Here, the No Project Alternative would not include construction of any of the Project components, which in turn would eliminate all construction and operational impacts at all of the Project component sites, avoiding all significant impacts identified for the Project. However, the beneficial impacts of the project with respect to the restoration of flows in the Carmel River would potentially be delayed or would not occur if the No Project Alternative was implemented. Benefits of the Project related to additional irrigation water for CSIP (and related to offset of groundwater pumping by delivering additional recycled water for crop irrigation) and potential improvements in seawater intrusion conditions would also not occur.

Under the No Project Alternative, none of the objectives of the Project would be met, and the benefits of the Project would not occur. The No Project Alternative would not enable CalAm to reduce its diversions from the Carmel River system by up to 3,500 AFY by injecting the same amount of purified recycled water into the Seaside Basin. This alternative also would not meet the project objective of providing additional water to the Regional Treatment Plant to be used for crop irrigation through the Salinas Valley Reclamation Plant and CSIP system, and there would be no drought reserve for crop irrigation within the CSIP area during dry years.

On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to provide the environmental benefits of the Project or to achieve the project objectives, and the Board rejects this alternative.

A commenter on the Draft EIR suggested that the larger desalination plant proposed by CalAm for the Monterey Peninsula Water Supply Project (MPSWP) would result from disapproval of the Proposed GWR Project. The MPSWP is an independent project undergoing

its own CEQA process, and that project is not an approved plan, nor is it consistent with available infrastructure. Nevertheless, the EIR describes the relationship between the Project and the MPSWP, and discloses that if the Project is approved and implemented, the desalination plant that CalAm would pursue as part of the MPSWP would be the smaller, 6.4 million gallons per day (mpg) plant rather than the larger 9.6 mpg plant. The scenario under which the smaller desalination plant could be combined with the GWR Project is described in the MPSWP Draft EIR as the "MPSWP Variant" and the combined impacts of the two projects are described in the EIR for the GWR Project as potential cumulative impacts.

The Board finds that the potential effects of approval and denial of the GWR Project on the size of the desalination plant proposed by CalAm for the MPSWP have been adequately disclosed in the EIR for the Project.

Reduced Seaside Basin Replenishment Project Alternative.

This alternative would constitute a 3,000 AFY capacity project for water deliveries for the Project to the Seaside Basin, instead of 3,500 AFY. All of the Project facilities would be constructed, and the proposed additional recycled water for crop irrigation in the CSIP area (4,500 to 4,750 AFY) would be included. Under this alternative, the required diversions of source water would be reduced. To produce 3,000 AFY of water, approximately 3,703 AFY of new source waters would be required to be diverted to the AWT Facility. This compares to the 4,320 AFY needed to produce 3,500 AFY under the Project.

This alternative would result in nearly the same environmental impacts as the Project, since all diversion, conveyance, storage, treatment and injection facilities would need to be constructed under this alternative, even though there would be a reduction of product water provided to the Seaside Groundwater Basin. This alternative would partially meet the project objectives during normal and dry years, in that a reduced water supply would be produced and available to CalAm – 3,000 AFY instead of the proposed 3,500 AFY to replenish the Seaside Groundwater Basin. This alternative would fully meet the Crop Irrigation water supply project objectives.

On balance, the relatively small environmental benefits that might be achieved with this alternative are outweighed by its failure to fully provide the environmental benefits that would be achieved by replacement of 3,500 acre feet per year of CalAm's water supply as required by state orders. This alternative would not fully achieve the project objectives, and the Board rejects this alternative.

Alternatives to Source Water Diversions and Use.

The Draft EIR considered eight different Reduced Source Water Alternatives, in which one or more source water components would be eliminated:

Reduced Source Water Alternative #1 (No Lake El Estero)

In this alternative, the Lake El Estero source water diversion facilities would not be implemented. The construction of the new physical facilities at the Lake El Estero site would not

occur, and no operational diversions of water from this water body to the wastewater collection system would occur.

Significant impacts related to biological resources (wetlands), construction and land use policy consistency would be eliminated at the Lake El Estero site. However, the alternative would not meet the project objectives to the extent that the Project would, including water demands for CalAm Monterey District of 3,500 AFY and for Crop Irrigation in the CSIP area of 4,500 – 4,750 AFY and up to 5,900 AFY in drought years. While the necessary amount of yield could be provided by the other proposed source waters without the Lake El Estero diversion, this component provides source water in certain drought years to more easily meet the project objectives and to provide more certainty that those objectives would be consistently achieved.

On balance, the relatively small environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Water Alternative #2 (No Tembladero Slough)

This alternative consists of a reduced source water diversion through elimination of the proposed diversion facilities at the Tembladero Slough Diversion site. Under this alternative, the construction of the new physical facilities at the Tembladero Slough Diversion site would not occur, and no operational diversions of water from this water body to the wastewater collection system would occur.

In comparison to the Project, elimination of this component would eliminate all of the significant impacts at the Tembladero Slough diversion, including the significant and unavailable noise impact. The alternative would meet the primary project objective of replenishment of the Seaside Basin but would not accomplish the project objectives to the extent that the Project would for CSIP irrigation in some drought years in comparison to the Project. During normal/wet years while building the drought reserve, the Tembladero Slough source water diversion would yield approximately 535 AFY. On average during such years, the Project would increase water supplied to the CSIP growers by approximately 5,456 AFY. If the Tembladero Slough diversion were eliminated from the Project, the Project would increase water supplied to the CSIP growers by 4,921 AFY (90% of the amount with Tembladero Slough).

During normal/wet years with a full drought reserve, water from the Tembladero Slough would not be needed if all other sources were available. The Tembladero Slough diversion would, however, provide a back-up source in the event other sources were not available.

Drought years when the drought reserve is used for the CSIP growers, the Tembladero Slough diversion would yield approximately 772 AFY. On average during such years, the Project would increase water supplied to the CSIP growers by approximately 5,728 AFY. If the Tembladero Slough diversion were eliminated from the Project, the Project would increase water supplied to the CSIP growers by 4,956 AFY (87% of the amount with Tembladero Slough).

On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Water Alternative #3 (No Tembladero Slough and No Lake El Estero)

In this alternative, there would be no source water diversion facilities constructed or operated at Tembladero Slough or at Lake El Estero. The construction of the new physical facilities at Tembladero Slough Diversion site at Lake El Estero would not occur, and no operational diversions of water from these water bodies to the wastewater collection system would occur.

Significant impacts related to noise, biological resources, cultural resources and land use policy consistency at the Lake El Estero and Tembladero sites would be eliminated. Additionally, impacts of public services, traffic, hazards and hazardous materials and energy would also be avoided at the Tembladero Slough and Lake El Estero sites due to the elimination of these diversion facilities. The significant and unavoidable noise impact at the Tembladero Slough diversion site also would be avoided.

This alternative would meet the primary project objective of replenishment of the Seaside Basin. However, elimination of the Tembladero Slough and Lake El Estero Diversions would not accomplish the Project objectives to the extent that the Project would because these source waters are needed to provide sufficient water supply during certain dry/drought year conditions, as explained under Reduced Source Water Alternatives 1 and 2, above. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Alternatives #4 (No Blanco Drain Diversions)

Under this alternative, there would be no diversion of surface waters from the Blanco Drain and the construction of the new Blanco Drain pump station and pipeline (including the trenchless construction or directionally drilling activities to install the pipeline under the Salinas River) would not occur.

The impacts of eliminating the Blanco Drain Diversion component would reduce the physical changes to this site because no construction would occur to install the facilities needed to divert the surface water. In addition, the less-than-significant operational changes to flow and water levels and associated habitat and special status species impacts in the downstream reaches of the watershed (a short segment of the Blanco Drain, Salinas River and lagoon) would not occur. Biological, cultural, traffic, energy, land use, public services and noise impacts would also be reduced at the Blanco Drain site due to the elimination of these facilities.

The alternative would not fully accomplish the project objectives; in some drought years, the yield of the alternative would only provide from 2,800 to 4,300 AFY for the proposed Crop Irrigation component, as compared to up to 5,900 AFY under the Project. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Alternatives #5 (No Reclamation Ditch and Tembladero Slough Diversions)

This alternative assumes no diversion from the source waters of the Reclamation Ditch or Tembladero Slough. No construction of physical facilities would be built at the Reclamation Ditch or Tembladero Slough Diversion sites, and no operational diversion of water and the resulting flow and water level changes to the existing surface water hydrology and habitat in the affected reaches (below the diversion points) would occur.

The impacts of eliminating these components would reduce the physical changes to these sites because no construction would occur to install the facilities needed to divert the surface water. In addition, the operational changes to flow and water levels in the downstream reaches of the watershed would not occur.

This alternative would not fully accomplish the project objectives; in some drought years, the yield of this alternative would be from 2,800 to 4,300 AFY for the proposed Crop Irrigation component, as compared to up to 5,900 AFY under the Project. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Alternative #6 (No Surface Water Appropriative Permits)

Under this alternative, the following diversions would be eliminated from the Project: Reclamation Ditch, Tembladero Slough, and Blanco Drain. The impacts of eliminating these components would reduce the physical changes to these sites because no construction would occur to install the facilities needed to divert the surface water. In addition, the operational changes to flow and water levels in the downstream reaches of the watershed would not occur.

The alternative would not fully accomplish the project objectives; in some drought years, the yield of the alternative would only provide from 2,800 to 4,300 AFY for the proposed Crop Irrigation component, as compared to up to 5,900 AFY under the Project. On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Water Alternative #7 (City of Salinas Sources Only - No Source Water Diversions to Augment CSIP Deliveries)

This alternative assumes new source waters would be conveyed to the Regional Treatment Plant for project use from the City of Salinas sources only, and this alternative eliminates all diversions from surface waters including the Reclamation Ditch, Tembladero Slough, Blanco Drain, and the diversion facility at Lake El Estero. This alternative assumes that no additional waters would be diverted to provide augmentation of recycled water for CSIP area crop irrigation as proposed under the Project.

Elimination of all of the surface water diversion components would reduce the physical changes to those sites because no construction would occur to install the facilities need to divert the surface water. In addition, the operational changes to flow and water levels in the downstream reaches of the Reclamation Ditch watershed would not occur.

This alternative would produce 3,500 AFY of purified recycled water to replace a portion of CalAm's water supply to meet project objectives to replenish the Seaside Basin. However,

irrigation waters for CSIP would not be augmented in comparison to the Project. This alternative would not fully meet the Crop Irrigation objectives.

On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Reduced Source Water Alternative #8 (No Agricultural Wash Water or South Salinas Stormwater)

Under this alternative, no physical changes would be made to the Salinas Pump Station source water diversion site, the Salinas Treatment Facility or the 33-inch wastewater pipeline to enable agricultural wash water and south Salinas stormwater to be stored and recovered for recycling and reuse. Construction and operational impacts related to biological (terrestrial and fisheries) resources, cultural resources, noise, energy, public services (waste disposal), and traffic impacts would be reduced under this alternative at the City of Salinas facilities due to the elimination of construction and operation of these facilities.

The alternative would not fully meet the project objective to provide additional agricultural irrigation water as the yield of the alternative would not provide the total Crop Irrigation yield of the Project, and in drought years would require the use of CSIP wells in the peak irrigation demand months.

On balance, the environmental benefits that might be achieved with this alternative are outweighed by its failure to fully achieve the project objectives, and the Board rejects this alternative.

Alternatives for Product Water Conveyance.

The Draft EIR describes two options for the Product Water Conveyance system, including two pipeline alignments and two associated locations for a booster pump station, called the RUWAP and Coastal Alignment Options. Only one of the two Product Water Conveyance pipeline alignments and booster pump stations would be constructed as part of the Project.

A comparison of the severity of impacts between the two alternative Product Water Conveyance Systems shows that they are very similar. The primary difference in impacts is in construction and operational impacts to riparian habitat and federally protected wetlands as defined by Section 404 of the Clean Water Act or waters of the state; specifically, the impacts of the RUWAP alignment option would be less than significant while the Coastal alignment option would be significant, but reduced to less than significant with mitigation in the EIR.

Either of the Product Water Conveyance options evaluated in the EIR would fully achieve the project objectives. The RUWAP Alignment Option would result in fewer adverse environmental impacts compared to the Coastal Alignment Option and is expected to be less costly to construct than the Coastal Alignment Option. For these reasons, the Board has determined that it will pursue the necessary permits and approvals to enable it to construct the RUWAP Alignment Option.

Alternatives to CalAm Distribution System Pipelines.

The CalAm Distribution System Transfer and Monterey Pipelines are proposed to be built by CalAm, and the Draft EIR considers alternative alignments for the proposed Transfer and Monterey Pipelines alignments. Importantly, if the Alternative Monterey Pipeline were constructed instead of the Proposed Project's alignment for the Monterey Pipeline, then the Transfer Pipeline would no longer be needed and the impacts associated with construction of the Transfer Pipeline would be eliminated.

Alternative Transfer Pipeline

Similar to the Project's alignment, the Alternative Transfer Pipeline would be 2.4 miles long. The level of significance and the severity of the impacts would be the same or similar for all impact topics if the Alternative Transfer Pipeline were constructed instead of the Proposed Transfer Pipeline, because both would be 2.4 miles long and both would be entirely within existing, paved, public roadways. The alternative would achieve the project objectives.

Because, as described below, the Board supports and selects the Alternative Monterey Pipeline, neither the proposed Transfer Pipeline nor the Alternative Transfer Pipeline is necessary for the Project to proceed, the Board rejects inclusion of either Transfer Pipeline alignment as part of the Project.

Alternative Monterey Pipeline

The Alternative Monterey Pipeline is 6.5 miles long. The entire Alternative Monterey Pipeline is located outside of the Coastal Zone. If the Alternative Monterey Pipeline is selected for construction, neither the proposed Monterey Pipeline, proposed Transfer Pipeline, nor the Alternative Transfer Pipeline would be built to deliver the required water quantities to meet CalAm customers' demands. The Alternative Monterey Pipeline would avoid and reduce significant impacts compared to the proposed Monterey Pipeline, and would avoid impacts of the Transfer Pipeline.

The Alternative Monterey Pipeline would fully achieve the project objectives. Due to being located outside of the Coastal Zone and the elimination of the need for the Transfer Pipeline, the Alternative Monterey Pipeline would also have the potential to be implemented more expeditiously and thus would better meet the objective of being implemented in a timely manner.

Because the Alternative Monterey Pipeline would substantially lessen the Project's adverse environmental impacts while also fully achieving the project objectives, the Board supports construction of the Alternative Monterey Pipeline, and hereby selects this alternative.

Overall Alternatives to the Project.

The Draft EIR also discusses several combinations of alternatives discussed above. These are called Alternative A, Alternative B, and Alternative C, and Table 6-6 in the Draft EIR provides an overview of the environmental impacts of each combined alternative compared to the Project.

Alternative A: Reduced Seaside Basin Replenishment and Alternative Monterey Pipeline

The Reduced Seaside Basin Replenishment Alternative would reduce the amount of water for Seaside Basin replenishment by 500 AFY compared to the Project (i.e., 3,000 AFY rather than 3,500 AFY of purified recycled water would be produced, conveyed to, and injected into the Seaside Basin, for later extraction by CalAm). The need to divert source waters would be reduced by approximately 600 AFY which could be achieved by eliminating one or more source water diversion sites, or by constructing and operating all of the source water diversions, but operating them with a lower total diversion amount.

If the Reduced Seaside Basin Replenishment Alternative were combined with the Alternative Monterey Pipeline (i.e., rather than the Proposed Transfer and Monterey Pipelines), numerous other significant construction impacts would be reduced due to reduced construction areas and activities, and the Project may be implemented more quickly, better meeting the project timeframe objective.

On balance, the relatively small environmental benefits that might be achieved by the Reduced Seaside Basin Replenishment component of this alternative are outweighed by the alternative's failure to fully provide the environmental benefits that would be achieved by replacement of 3,500 acre feet per year of CalAm's water supply as required by state orders. This alternative would not fully achieve the project objectives, and the Board rejects this alternative.

The Board selects the Alternative Monterey Pipeline.

Alternative B: Reduced Source Water Alternative # 2 (No Tembladero Slough) and Alternative Monterey Pipeline

Reduced Source Water Alternative # 2 would avoid the significant and unavoidable noise impact at the Tembladero Slough diversion due to exceedances of the MRWPCA's noise level ordinance; however, the alternative would not meet the project objectives as fully as the Project. Specifically, the Reduced Source Water Alternative #2 would only provide up to 5,200 AFY for the proposed Crop Irrigation component in some drought years (compared to up to 5,900 AFY under the Project).

If the Reduced Source Water Alternative #2 was combined with the Alternative Monterey Pipeline (i.e., rather than the Proposed Transfer and Monterey Pipeline), numerous other significant construction impacts would be reduced due to reduced construction areas and activities. Because the Alternative Monterey Pipeline avoids the Coastal Zone, it may be implemented more quickly than the Proposed Monterey Pipeline, better meeting the project timeframe objective.

The EIR determined that other than the No Project Alternative, the Environmentally Superior Alternative would be the Reduced Source Water (No Tembladero Slough) Alternative combined with the Alternative Monterey Pipeline.

On balance, the environmental benefits that might be achieved by eliminating the Tembladero Slough diversion are outweighed by this alternative's failure to fully achieve the project objectives, and the Board rejects this alternative.

The Board selects the Alternative Monterey Pipeline.

Alternative C: Reduced Source Water Alternative # 7 (Salinas Source Waters Only) and Alternative Monterey Pipeline

Reduced Source Water Alternative #7 (Salinas Source Waters Only) was found to avoid the significant and unavoidable noise impact at the Tembladero Slough Diversion, in addition to reducing environmental impacts related to source water diversions from surface waters, such as changes in flow, induced water level changes, and direct and indirect impacts on biological resources (albeit the latter would be less-than-significant under the Project). The Reduced Source Water Alternative #7 would not meet the Crop Irrigation objective to the extent that the Project would; in fact it would provide very little or no augmentation of the existing supplies to the CSIP area.

If the Reduced Source Water Alternative #7 was combined with the Alternative Monterey Pipeline (i.e., rather than both the Proposed Transfer and Monterey Pipelines), numerous other significant construction impacts would be reduced due to reduced construction areas and activities. Because the Monterey Pipeline avoids the Coastal Zone, it may be implemented more quickly than the Project, better meeting the project timeframe objective.

On balance, the environmental benefits that might be achieved by eliminating all new source waters except for the Salinas source waters are outweighed by this alternative's failure to fully achieve the project objectives, and the Board rejects this alternative.

The Board selects the Alternative Monterey Pipeline.

Summary of Findings Regarding Alternatives. For all of the foregoing reasons, the Board has determined to approve the Project as modified by the Alternative Monterey Pipeline, instead of any of the other alternatives. As noted above, with the construction of the Alternative Monterey Pipeline, the Transfer Pipeline is no longer needed, and the impacts associated with construction of the Transfer Pipeline are eliminated. On balance, the Board finds that the Project as modified by the Alternative Monterey Pipeline best achieves the project objectives and environmental benefits.

c. Findings Regarding Suggestions for Modifying the Project, Variations on the Alternatives, and a Suggested Off-Site Alternative

Various modifications to the Project and variations on the alternatives were proposed in comments on the Draft EIR.

Certain commenters expressed their preference for an alternative to the Project or components thereof, and these are thoroughly discussed in Chapter 3 of the Final EIR (Master Responses to Comments on the Draft EIR), which is incorporated by reference into these

findings. These proposed variations included a reduced Seaside Basin replenishment alternative, increased proposed project yield or AWT facility size alternatives, alternative water supply sources, a request for the Project to be considered an independent project, alternative pipeline alignments, and an additional no project alternative. The Final EIR determined that no additional alternatives were considered necessary to be added in the Final EIR because the alternatives suggested either would not reduce identified significant impacts, or would not feasibly meet most of the basic project objectives.

With respect to the additional alternatives suggested by commenters that were not added to the Final EIR, the Board hereby adopts and incorporates by reference the reasons set forth in the responses to comments contained in the Final EIR as its grounds for rejecting the addition of these alternatives.

Findings Regarding Adequacy of Range of Alternatives. The Board finds that the range of alternatives evaluated in the EIR reflects a reasonable attempt to identify and evaluate various types of alternatives that would potentially be capable of reducing the Project's environmental effects, while accomplishing most but not all of the project objectives. The Board finds that the alternatives analysis is sufficient to inform the Board and the public regarding the tradeoffs between the degree to which alternatives to the Project could reduce environmental impacts and the corresponding degree to which the alternatives would hinder the MRWPCA's ability to achieve the project objectives.

D. Statement of Overriding Considerations

1. Impacts That Remain Significant

As discussed in Exhibit A, the Board has found that the following impacts of the Project would or could remain significant following MRWPCA adoption of the mitigation measures described in the Final EIR:

- Impact NV-1: Construction Noise (Alternative Monterey Pipeline)
- Impact NV-2: Construction Noise That Exceeds or Violate Local Standards (Tembladero Slough)

2. Overriding Considerations Justifying Project Approval

In accordance with CEQA Guidelines Section 15093, the Board has, in determining whether or not to approve the Project, balanced the economic, social, technological, and other project benefits against the Project's unavoidable environmental risks, and finds that the benefits of the Project set forth below outweigh the significant adverse environmental effects that are not mitigated to less than significant levels. This statement of overriding considerations is based on the Board's review of the Final EIR and other information in the administrative record. The benefits identified below provide separate and independent bases for overriding the significant environmental effects of the Project.

- The Project would replace 3,500 AFY of unauthorized Carmel River diversions for municipal use with additional groundwater pumping enabled by recharge of purified recycled water;

- The Project would provide up to 4,500 – 4,750 AFY and up to 5,900 AFY in drought years of additional recycled water to Salinas Valley growers for crop irrigation;

- The Salinas Valley Groundwater Basin is in overdraft and the Project would reduce the volume of water pumped from Salinas Valley aquifers;

- The Project would increase water supply reliability and drought resistance;

- The Project would maximize the use of recycled water in compliance with the state Recycled Water Policy;

- The Project would reduce pollutant loads from agricultural areas to sensitive environmental areas including the Salinas River and Monterey Bay.

E. Record of Proceedings

Various documents and other materials constitute the record upon which the Board bases these findings and the approvals contained herein. The location and custodian of these documents and materials is: Mike McCullough, Governmental Affairs Administrator, Monterey Regional Water Pollution Control Agency, 5 Harris Court, Building D, Monterey, CA 93940.

F. Mitigation Monitoring and Reporting Program

In accordance with CEQA and the CEQA Guidelines, the Board must adopt a mitigation monitoring program to ensure that the mitigation measures adopted herein are implemented. The Board hereby adopts the Mitigation Monitoring and Reporting Program for the Project attached to these findings as Exhibit B.

G. Summary

1. Based on the foregoing findings and the information contained in the administrative record, the Board has made one or more of the following findings with respect to each of the significant environmental effects of the Project identified in the Final EIR:

a. Changes or alterations have been required in, or incorporated into, the Project which avoid or substantially lessen the significant environmental effects on the environment.

b. Those changes or alterations that are wholly or partially within the responsibility and jurisdiction of another public agency have been, or can and should be, adopted by that other public agency.

c. Specific economic, social, technological, or other considerations make infeasible the mitigation measures or alternatives identified in the Final EIR that would otherwise avoid or substantially lessen the identified significant environmental effects of the Project.

2. Based on the foregoing findings and information contained in the record, it is hereby determined that:

a. All significant effects on the environment due to approval of the Project have been eliminated or substantially lessened where feasible.

b. Any remaining significant effects on the environment found unavoidable are acceptable due to the factors described in the Statement of Overriding Considerations in Section II.D, above.

III. PROJECT APPROVAL

1. The Board hereby approves the Project as modified by the Alternative Monterey Pipeline, and the Board hereby selects the RUWAP Alignment Option for the Product Water Conveyance pipeline and booster pump station.

2. The Board hereby authorizes staff to proceed immediately with obtaining necessary agreements, permits, funding and financing, and approvals to construct and operate any or all of the following Project components, including applying to the State Water Resources Control Board for financing provided by the Clean Water State Revolving Fund Loan program or other grant and loan programs:

a. Diversion and use of the following Source Waters: unused treated wastewater from the MRWPCA Regional Treatment Plant; agricultural wash water from the Salinas Treatment Facility; Salinas Treatment Facility pond storage and recovery; City of Salinas urban runoff; Reclamation Ditch; Tembladero Slough; Blanco Drain; and Lake El Estero.[2]

b. Treatment Facilities at the Regional Treatment Plant including a new AWT Facility and Salinas Valley Reclamation Plant modifications.

c. Product Water Conveyance RUWAP Alignment Option including a pipeline and booster pump station.

d. Injection Well Facilities including injection wells, back-flush facilities, monitoring wells, and electrical power supply facilities, driveways, motor control and instrumentation buildings for the injection wells and back-flush operations .

[2] Although Tembladero Slough and Lake El Estero source water diversions are included as a component of the Project in this Project approval, the MRWPCA and their partner agency may not include these facilities in the initial phase of the Project, in particular they may not be included in permit applications, loan applications, and/or grant applications. There would be no effect on Project yields due to elimination of the Lake El Estero source water diversion due to the amount and timing of water available from this source. The effect of not implementing the Tembladero Slough diversion would be a reduction in the crop irrigation water yield for the Castroville Seawater Intrusion Project (CSIP) of approximately 500 to 750 acre feet per year (AFY) within some drought years. Based on source water analysis in the EIR, the Project would be expected to achieve a CSIP crop irrigation additional yield of 4,750 to 4,950 AFY and, although less frequently, up to 5,292 AFY in drought years.

e. All necessary infrastructure, construction equipment, construction staging and lay down areas, mitigation, and other activities needed to carry out the Project, with the exception of the Alternative Monterey Pipeline, which would be constructed by CalAm and is not within the control of the MRWPCA.

Exhibit A.

Summary of Impacts and Mitigation Measures for the Staff-Recommended Alternative **DRAFT**

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
KEY TO ACRONYMS: NI – No Impact; LS – Less than Significant; LSM – Less than Significant with Mitigation; SU – Significant and Unavoidable; BI- Beneficial Impact												
Aesthetics (AE)												
AE-1: Construction Impacts on Scenic Views, Scenic Resources and Visual Quality of the Surrounding Areas. Project construction would not result in substantial effects on scenic views, scenic resources or the visual character of the areas surrounding Project facilities.	LS	NI	LS	LS	NI	LS	NI	LS	LS	LS	**LS**	None required.
AE-2: Construction Impacts due to Temporary Light and Glare. Project construction could result in substantial, temporary sources of light or glare.	LS	NI	NI	NI	LS	LS	LS	NI	LSM	LSM	**LSM**	**Mitigation Measure AE-2**: Minimize Construction Nighttime Lighting. (Applies to the Injection Well Facilities Site and CalAm Distribution System: Alternative Monterey Pipeline). As part of its contract specifications, MRWPCA shall require its construction contractors to implement site-specific nighttime construction lighting measures for nighttime construction at the proposed Injection Well Facilities site and for the CalAm Distribution System: Alternative Monterey Pipeline. The measures shall, at a minimum, require that lighting be shielded, directed downward onto work areas to minimize light spillover, and specify that construction lighting use the minimum wattage necessary to provide safety at the construction sites. MRWPCA shall ensure these measures are implemented at all times during nighttime construction at the Injection Well Facilities site and for the CalAm Distribution System: Alternative Monterey Pipeline and for the duration of all required nighttime construction activity at these locations.
AE-3: Degradation of Visual Quality of Sites and Surrounding Areas. Project components would not result in a substantial degradation of the visual character of the project area and its surroundings.	LS	LS	LS	LS	LS	LS	LS	LS	LS	NI	**LS**	The following mitigation measure will be adopted by the MRWPCA due to City of Seaside comments on the Draft EIR and Notice of Preparation: **Mitigation Measure AE-3: Provide Aesthetic Screening for New Above-Ground Structures.** (Applies to the following project components: Product Water Conveyance: RUWAP Booster Pump Station and Injection Well Facilities). Proposed above-ground features at the Booster Pump Station and Injection Well Facilities (at a minimum, at the well clusters and back-flush basin), shall be designed to minimize visual impacts by incorporating screening with vegetation, or other aesthetic design treatments, subject to review and approval of the City of Seaside which has also requested that the buildings be designed with Monterey/Mission style architecture to match the design of the structures that have been built on the Santa Margarita ASR site and the Seaside Middle School ASR Site. All pipelines placed within the City of Seaside on General Jim Moore Boulevard shall be placed underground. MRWPCA shall coordinate with the City of Seaside on the location of injection wells and booster pumps in order to reduce conflicts with future commercial/residential development opportunities. Screening and aesthetic design treatments at the RUWAP Booster Pump Station component shall be subject to review and approval by the City of Marina. Use of standard, commercial-grade, chain link fencing and barbed wire should be discouraged.
AE-4: Impacts due to Permanent Light and Glare during Operations. Operation of Project facilities may result in a substantial new source of light or glare that would adversely affect day or nighttime views in the area.	NI	NI	NI	NI	NI	NI	LS	LSM	LSM	NI	**LSM**	**Mitigation Measure AE-4**: Exterior Lighting Minimization. (Applies to the following project components: Product Water Conveyance: RUWAP Booster Pump Station and Injection Well Facilities) To prevent exterior lighting from affecting nighttime views, the design and operation of lighting at the Product Water Conveyance RUWAP Booster Pump Station and Injection Well Facilities, shall adhere to the following requirements: • Use of low-intensity street lighting and low-intensity exterior lighting shall be required. No floodlights shall be allowed at night within the City of Marina. • Lighting fixtures shall be cast downward and shielded to prevent light from spilling onto adjacent offsite uses. • Lighting fixtures shall be designed and placed to minimize glare that could affect users of adjacent properties, buildings, and roadways. • Fixtures and standards shall conform to state and local safety and illumination requirements.
Air Quality and Greenhouse Gas (AQ)												
AQ-1: Construction Criteria Pollutant Emissions. Construction of the Project would result in emissions of criteria pollutants, specifically PM_{10}, that may conflict with or obstruct implementation of the applicable air quality plan and may violate an air quality standard or contribute substantially to an existing or projected air quality violation in a region that is non-attainment under State ambient air quality standards.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LSM**[1]	**Mitigation Measure AQ-1**: Construction Fugitive Dust Control Plan. (Applies to all Project Component Sites where ground disturbance would occur.) The following standard Dust Control Measures shall be implemented during construction to help prevent potential nuisances to nearby receptors due to fugitive dust and to reduce contributions to exceedances of the state ambient air quality standards for PM_{10}, in accordance with MBUAPCD's CEQA Guidelines. • Water all active construction areas as required with non-potable sources to the extent feasible; frequency should be based on the type of operation, soil, and wind exposure and minimized to prevent wasteful use of water. • Prohibit grading activities during periods of high wind (over 15 mph). • Cover all trucks hauling soil, sand, and other loose materials and require trucks to maintain at least 2 feet of freeboard. • Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas at construction sites. • Sweep streets daily (with water sweepers) if visible soil material is carried onto adjacent public streets. • Enclose, cover, or water daily exposed stockpiles (dirt, sand, etc.). • Replant vegetation in disturbed areas as quickly as possible. • Wheel washers shall be installed and used by truck operators at the exits of the construction sites to the AWT Facility site, the Injection Well Facilities, and the Booster Pump Station. • Post a publicly visible sign that specifies the telephone number and person to contact regarding dust complaints. This person shall respond to complaints

[1] Under Impact AQ-1, the implementation of each component when looked at individually would not a have a significant impact; it is only when all components are implemented together (with overlapping construction schedules) that a significant impact would occur triggering Mitigation Measures to reduce the impact to less than significant (LS).

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
KEY TO ACRONYMS: NI – No Impact; LS – Less than Significant; LSM – Less than Significant with Mitigation; SU – Significant and Unavoidable; BI- Beneficial Impact												
												and take corrective action within 48 hours. The phone number of the MBUAPCD shall also be visible to ensure compliance with MBUAPCD rules.
AQ-2: Construction Exposure of Sensitive Receptors to Pollutant Emissions. Construction of the Project would not expose sensitive receptors to substantial pollutant concentrations.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
AQ-3: Construction Odors. Construction of the Project would not create objectionable odors affecting a substantial number of people.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
AQ-4C: Construction Greenhouse Gas Emissions. Construction of the Project would generate greenhouse gas emissions, either directly or indirectly, but would not make a considerable contribution to significant cumulative impacts due to greenhouse gas emissions and the related global climate change impacts.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
AQ-5: Operational Air Quality Violation. Operation of the Project would result in criteria pollutant emissions, but would not violate air quality standards or contribute substantially to an existing or projected air quality violation.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
AQ-6: Operational Criteria Pollutant Emissions. Operation of the Project would result in a net increase of criteria pollutants in a region that is non-attainment under State ambient air quality standards, but the increase would not be cumulatively considerable.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
AQ-7: Operational Exposure of Sensitive Receptors to Pollutants. Operation of the Project would not expose sensitive receptors to substantial pollutant concentrations.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
AQ-8: Operational Odors. Operation of the Project would not create objectionable odors affecting a substantial number of people.	LS	LS	LS	LS	LS	NI	LS	NI	NI	NI	**LS**	None required.
AQ-9C: Operational Greenhouse Gas Emissions. Operation of the Project would generate greenhouse gas emissions, either directly or indirectly. These emissions would not exceed significance thresholds such that they would result in a considerable contribution to significant cumulative impacts of greenhouse gas emissions and the related global climate change impacts. In addition, the Project would not conflict with applicable plan, policy or regulation adopted for the purpose of reducing greenhouse gas emissions.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites: Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
KEY TO ACRONYMS: NI – No Impact; LS – Less than Significant; LSM – Less than Significant with Mitigation; SU – Significant and Unavoidable; BI- Beneficial Impact												
Biological Resources: Fisheries (BF)												
BF-1: Habitat Modification Due to Construction of Diversion Facilities. Construction of the proposed Reclamation Ditch and Tembladero Slough diversions could indirectly result in habitat modifications for endangered or threatened fish species as a result of construction activities and dewatering the construction sites.	NI	NI	LSM	LSM	LS	NI	NI	NI	NI	NI	**LSM**	**Mitigation Measure BT-1a** (see text after this table under Mitigation Measures for Impact BT-1: Construction Impacts to Special-Status Species and Habitat) **Mitigation Measure BF-1a**: Construction during Low Flow Season. (Applies to Blanco Drain[2], Reclamation Ditch and Tembladero Slough Diversions) Implement Mitigation Measure BT-1a.Conduct construction of diversion facilities, including the directional drilling under the Salinas River, during periods of low flow outside of the SCCC steelhead migration periods, i.e. between June and November, which would be outside of the adult migration period from December through April and outside of the smolt migration period from March through May. **Mitigation Measure BF-1b:** Relocation of Aquatic Species during Construction. (Applies to Reclamation Ditch and Tembladero Slough Diversions). Conduct pre-construction surveys to determine whether tidewater gobies or other fish species are present, and if so, implement appropriate measures in consultation with applicable regulatory agencies, which may include a program for capture and relocation of tidewater gobies to suitable habitat outside of work area during construction. Pre-construction surveys shall be consistent with requirements and approved protocols of applicable resource agencies and performed by a qualified fisheries biologist. **Mitigation Measure BF-1c:** Tidewater Goby and Steelhead Impact Avoidance and Minimization. (Applies to Reclamation Ditch and Tembladero Slough Diversions) To ensure compliance with the federal Endangered Species Act (FESA) and the California Endangered Species Act (CESA), consultation with NFMS/NOAA, USFWS, and CDFW shall be conducted as required, and any necessary take permits or authorizations would be obtained. If suitable habitat for tidewater goby (Tembladero Slough) and steelhead cannot be avoided, any in-stream portions of each project component (where the Project improvements require in-stream work) shall be dewatered/ diverted. A dewatering/diversion plan shall be prepared and submitted to NMFS, USFWS, and CDFW for review and approval. Specific plan elements are noted below and will be refined through consultation with USFWS, NMFS and CDFW: • Required Pre-Construction surveys identified in Mitigation Measure BF-1b shall be consistent with requirements and approved protocol of applicable resource agencies and performed by a qualified fisheries biologist. • All dewatering/diversion activities shall be monitored by a qualified fisheries biologist. The fisheries biologist shall be responsible for capture and relocation of fish species out of the work area during dewatering/diversion installation. • The project proponents shall designate a qualified representative to monitor on-site compliance of all avoidance and minimization measures. The fisheries biologist shall have the authority to halt any action which may result in the take of listed species. • Only USFWS/NMFS/CDFW-approved biologists shall participate in the capture and handling of listed species subject to the conditions in the Incidental Take Permits as noted above. • No equipment shall be permitted to enter wetted portions of any affected drainage channel. All equipment operating within streams shall be in good conditions and free of leaks. • Spill containment shall be installed under all equipment staged within stream areas and extra spill containment and clean up materials shall be located in close proximity for easy access. • Work within and adjacent to streams shall not occur between November 1 and June 1 unless otherwise approved by NMFS and the CDFW. • If project activities could degrade water quality, water quality sampling shall be implemented to identify the pre-project baseline, and to monitor during construction for comparison to the baseline. If water is to be pumped around work sites, intakes shall be completely screen with wire mesh not larger than five millimeters to prevent animals from entering the pump system. • If any tidewater goby or steelhead are harmed during implementation of the project, the project biologist shall document the circumstances that led to harm and shall determine if project activities should cease or be altered in an effort to avoid further harm to the species. • Water turbidity shall be monitored by a qualified biologist or water quality specialist during all instream work. Water turbidity shall be tested daily at both an upstream location for baseline measurement and downstream to determine if project activities are altering water turbidity. Turbidity measures shall be taken within 50 feet of construction activities to rule out other outside influences. Additional turbidity testing shall occur if visual monitoring indicates an increased in turbidity downstream of the work area. If turbidity levels immediately downstream of the project rise to more than 20 NTUs (Nephelometric Turbidity Units) above the upstream (baseline) turbidity levels, all construction shall be halted and all erosion and sediment control devices shall be thoroughly inspected for proper function, or shall be replaced with new devices to prevent additional sediment discharge into streams. The above mitigation is subject to review and approval for CESA and FESA requirements by approving agencies as identified above and may be modified to further reduce, avoid or minimize impacts to species.
BF-2: Interference with Fish Migration. Operation of the Project would result in changes in stream flows that may interfere with fish migration in the Salinas River and Reclamation Ditch.	LS	LS	LSM	LS	LS	NI	NI	NI	NI	NI	**LSM**	**Mitigation Measure BF-2a:** Maintain Migration Flows. (Applies to the Reclamation Ditch Diversion) Implement BF-1a, BF-1b, and BF-1c. Operate diversions to maintain steelhead migration flows in the Reclamation Ditch based on two criteria – one for upstream adult passage in Jan-Feb-Mar and one for downstream juvenile passage in Apr-May. For juvenile passage, the downstream passage shall have a flow trigger in both Gabilan Creek and at the Reclamation Ditch, so that if there is flow in Gabilan Creek that would allow outmigration, then the bypass flow requirements, as measured at the San Jon Gage of the Reclamation Ditch, shall be applied (see Hagar Environmental Science, *Estimation of Minimum Flows for Migration of Steelhead in the Reclamation Ditch*, February 27, 2015, in Appendix G-2, of the Draft EIR and Schaaf & Wheeler, *Fish Passage Analysis: Reclamation Ditch at San Jon Rd. and Gabilan Creek at Laurel Rd.* July 15, 2015 in Appendix CC of this Final EIR). If there is no flow in Gabilan Creek, then only the low flow (minimum bypass flow requirement as proposed in the project description) shall be

[2] Although Impact BF-1 was found to be less than significant due to the construction of the Blanco Drain Source Water Diversion, this mitigation measure will be implemented for construction of the pipeline under Salinas River under the Blanco Drain component of the Project based on comments from the State Lands Commission (see comment and response to comment D-3 in Chapter 4 of the Final EIR document).

Exhibit A (continued)

Impact Statement	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
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												applied, and these flows for the dry season at Reclamation Ditch as measured at the San Jon USGS gage shall be met. *Note: If there is no flow gage in Gabilan Creek, then downstream passage flow trigger shall be managed based on San Jon Road gage and flows.* *Alternately, as the San Jon weir located at the USGS gage is considered a barrier to steelhead migration and the bypass flow requirements have been developed to allow adult and smolt steelhead migration to have adequate flow to travel past this obstacle, if the weir were to be modified to allow steelhead passage, the mitigation above would not have to be met. Therefore, alternate Mitigation Measure BF-2a has been developed, as follows:* **Mitigation Measure Alternate BF-2a**: Modify San Jon Weir. (Applies to the Reclamation Ditch Diversion) Construct modifications to the existing San Jon weir to provide for steelhead passage. Modifications could include downstream pool, modifications to the structural configuration of the weir to allow passage or other construction, and improvements to remove the impediment to steelhead passage defined above. The above mitigation is subject to compliance with CESA and FESA and appropriate approving agencies may modify the above mitigation to further reduce, avoid, or minimize impacts to species.
BF-3: Reduction in Fish Habitat or Fish Populations Due to Project Operations. Operation of the Project diversions would not reduce the habitat of a fish species or substantially affect fish populations.	LS	LS	LS	LS	LS	NI	NI	NI	NI	NI	**LS**	None required.
Biological Resources: Terrestrial (BT)												
BT-1: Construction Impacts to Special-Status Species and Habitat. Project construction may adversely affect, either directly or through habitat modification, special-status plant and wildlife species and their habitat within the Project Study Area.	LSM	LSM	LSM	LSM	LSM	LSM	NI	LSM	LSM	LSM	**LSM**	See complete text of Mitigation Measures BT-1a through BT-1q and their applicability to each component in the text following this table.
BT-2: Construction Impacts to Sensitive Habitats. Project construction may adversely affect sensitive habitats (including riparian, wetlands, and/or other sensitive natural communities) within the Project Study Area.	NI	NI	LSM	LSM	LSM	NI	NI	LS	LS	LS	**LSM**	**Mitigation Measure BT-1a** (see text after this table under Mitigation Measures for Impact BT-1: Construction Impacts to Special-Status Species and Habitat) **Mitigation Measure BT-2a**: Avoidance and Minimization of Impacts to Riparian Habitat and Wetland Habitats. (Applies to Reclamation Ditch, Tembladero Slough Diversion, Blanco Drain Diversion) Implement Mitigation Measure BT-1a. When designing the facilities at these component sites, the MRWPCA shall site and design project features to avoid impacts to the riparian and wetland habitats shown in Attachment 8 of Appendix H and Appendix I, including direct habitat removal and indirect hydrology and water quality impacts, to the greatest extent feasible while taking into account site and engineering constraints. To protect this sensitive habitat during construction, the following measures shall be implemented: • Place construction fencing around riparian and wetland habitat (i.e., areas adjacent to or nearby the Project construction) to be preserved to ensure construction activities and personnel do not impact this area. • All proposed lighting shall be designed to avoid light and glare into the riparian and wetland habitat. Light sources shall not illuminate these areas or cause glare. In the event that full avoidance is not possible and a portion or all of the riparian and wetland habitat would be impacted, the following minimization measures shall be implemented: • Permanently impacted riparian and wetland habitat shall be mitigated at no less than a 2:1 replacement-to-loss ratio through restoration and/or preservation. The final mitigation amounts for both temporary and permanent impacts to riparian and wetland habitat shall be determined during the design phase but cannot be less than 2:1 for permanent impacts and 1:1 for temporary impacts, and must be approved by the relevant permitting agencies (USACOE, RWQCB, CDFW, and the entity issuing any Coastal Development Permit). The preserved mitigation land shall be managed to improve wetland and riparian conditions compared to existing conditions. It is expected that the mitigation can occur within the Locke Paddon Lake watershed, along the Tembladero Slough, and within the Salinas River corridor near the Blanco Drain near where impacts may occur. A Habitat Mitigation and Monitoring Plan (HMMP) shall be prepared by a qualified biologist to mitigate for impacts to riparian and wetland habitat. The HMMP shall outline the details of a riparian and wetland habitat restoration plan, including but not limited to, planting plan, success criteria, monitoring protocols to determine if the success criteria have been met, adaptive management protocols in the case that the success criteria are not met, and funding assurances. Plantings and revegetation conducted in compliance with this mitigation measure shall be monitored for a minimum of three years after project completion. **Mitigation Measure BT-2b:** Not required for Project Staff-Recommended Alternative (selection of RUWAP Alignment Option and Alternative Monterey Pipeline) **Mitigation Measure BT-2c**: The project proponents in coordination with the contractor shall prepare and implement a Frac-Out Plan to avoid or reduce accidental impacts resulting from horizontal directional drilling (HDD) beneath the Salinas River. The Frac-Out Plan shall address spill prevention, containment, and clean-up methodology in the event of a frac out. The proposed HDD component of the Blanco Drain diversion shall be designed and conducted to minimize the risk of spills and frac-out events. The Frac-Out Plan shall be prepared and submitted to United States Fish and Wildlife Services, California Department of Fish and Wildlife, National Marine Fisheries Services, and the Regional Water Quality Control Board prior to commencement of HDD activities for the Blanco Drain Diversion construction. The following are typical contents of a Frac-Out Plan: • Project description, including details of the HDD design and operations • Site description and existing conditions • Potential modes of HDD failure and HDD failure prevention and mitigation • Frac-out prevention measures (including for example, geotechnical investigations, planning for appropriate depths based on those investigations, presence of

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
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												a qualified engineer during drilling to monitor the drilling process, live adjustments to the pace of drill advancement to ensure sufficient time for cutting and fluid circulation and to prevent or minimize plugging, maintaining the minimum drilling pressure necessary to maintain fluid circulation, etc.) • Monitoring requirements (for example, monitoring pump pressure circulation rate, ground surface and surface water inspection, advancing the drill only during daytime hours, on-site biological resource monitoring by a qualified biologist) • Response to accidental frac-out (including stopping drilling, permitting agency notification, surveying the area, containing the frac-out material, contacting the project biological monitor to identify and relocate species potentially in the area, turbidity monitoring, procedures for clean-up and mitigation of hazardous waste spill materials, preparation of documentation of the event, etc.) • Coordination plan and contact list of key project proponents, biological monitor, and agency staff in the event of an accidental frac-out event.
BT-3: Construction Impacts to Movement of Native Wildlife and Native Wildlife Nursery Sites. Project construction would not adversely affect native wildlife corridors and wildlife nursery sites.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
BT-4: Construction Conflicts with Local Policies, Ordinances, or Approved Habitat Conservation Plan. Project construction would potentially conflict with local policies or ordinances protecting biological resources. A conflict may occur if the HMP plant species within the Project component sites on the former Fort Ord that do not require a take authorization from the Service or CDFW are impacted, and seed salvage is not conducted. There are no approved HCPs applicable to the Project.	LS	LS	LS	LS	LS	LS	LS	LSM	LSM	LS	**LSM**	**Mitigation Measure BT-4**. HMP Plant Species Salvage. (Applies to Product Water Conveyance: RUWAP Alignment, and Injection Well Facilities site within the former Fort Ord only) For impacts to the HMP plant species within the Project Study Area that do not require take authorization from USFWS or CDFW, salvage efforts for these species shall be evaluated by a qualified biologist per the requirements of the HMP and BO. A salvage plan shall be prepared and implemented by a qualified biologist, which shall would include, but is not limited to: a description and evaluation of salvage opportunities and constraints; a description of the appropriate methods and protocols of salvage and relocation efforts; identification of relocation and restoration areas; and identification of qualified biologists approved to perform the salvage efforts, including the identification of any required collection permits from USFWS and/or CDFW. Where proposed, seed collection shall occur from plants within the Project Study Area and topsoil shall be salvaged within occupied areas to be disturbed. Seeds shall be collected during the appropriate time of year for each species by qualified biologists. At the time of seed collection, a map shall also be prepared that identifies the specific locations of the plants for any future topsoil preservation efforts. The collected seeds shall be used to revegetate temporarily disturbed construction areas and reseeding and restoration efforts on- or off-site, as determined appropriate in the salvage plan.
BT-5: Operational Impacts to Special-Status Species. Project operations would not adversely affect, either directly or through habitat modification, special-status plant and wildlife species and their habitat.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
BT-6: Operational Impacts to Sensitive Habitats. Project operations may adversely affect sensitive habitats (including riparian, wetlands, and/or other sensitive natural communities) within and adjacent to the Project Study Area.	LS	LS	LS	LS	LS	LS	NI	LS	LS	LS	**LS**	None required.
BT-7: Operational Impacts to Movement of Native Wildlife and to Native Wildlife Nursery Sites. Project operations would not adversely affect native wildlife corridors and wildlife nursery sites.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
BT-8: Operational Conflicts with Local Policies, Ordinances, or approved Habitat Conservation Plan. Project operations would not conflict with local policies or ordinances protecting biological resources.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites: Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
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Cultural and Paleontological Resources (CR)												
CR-1: Construction Impacts on Historic Resources. Project construction may result in a substantial adverse change in the significance of a known historic resource as defined in 15064.5 of the CEQA Guidelines or historic properties pursuant to 36 CFR 800.5.	NI	NI	NI	NI	NI	NI	NI	NI	NI	LSM	**LSM**	**Mitigation Measure CR-1**: Avoidance and Vibration Monitoring for Pipeline Installation in the Presidio of Monterey Historic District, and Downtown Monterey. (Applies to portion of the CalAm Distribution System: Alternative Monterey Pipeline) CalAm shall construct the section of the Alternative Monterey Pipeline located on Stillwell Avenue within the Presidio of Monterey Historic District, adjacent to the Spanish Royal Presidio, and within the Monterey Old Town National Historic Landmark District (including adjacent to Stokes Adobe, the Gabriel de la Torre Adobe, the Fremont Adobe, Colton Hall, and Friendly Plaza in downtown Monterey)[3] as close as possible to the centerlines of these streets to: (1) avoid direct impacts to the historic Presidio Entrance Monument, and (2) reduce impacts from construction vibration to below the 0.12 inches per second (in/sec) peak particle velocity vibration PPV) threshold. If CalAm determines that the pipeline cannot be located near the centerline of these street segments due to traffic concerns or existing utilities, the historic properties identified on Table 4.6-2 of the GWR Project Draft EIR (MRWPCA/DD&A, April 2015) shall be monitored for vibration during pipeline construction, especially during the use of jackhammers and vibratory rollers. If construction vibration levels exceed 0.12 in/sec PPV, construction shall be halted and other construction methods shall be employed to reduce the vibration levels below the standard threshold. Alternative construction methods may include using concrete saws instead of jackhammers or hoe-rams to open excavation trenches, the use of non-vibratory rollers, and hand excavation. If impact sheet pile installation is needed (i.e., for horizontal directional drilling or jack-and-bore) within 80 feet of any historical resource or within 80 feet of a historic district, CalAm shall monitor vibration levels to ensure that the 0.12-in/sec PPV damage threshold is not exceeded. If vibration levels exceed the applicable threshold, the contractor shall use alternative construction methods such as vibratory pile drivers.
CR-2: Construction Impacts on Archaeological Resources or Human Remains. Project construction may result in a substantial adverse change in the significance of one known archaeological resource and to unknown archaeological resources during construction and/or encounter unknown human remains.	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	**LSM**	**Mitigation Measure CR-2a**: Archaeological Monitoring Plan. (Applies to the segment of the CalAm Distribution Pipeline through the Presidio of Monterey and along W. Franklin Street and to the Lake El Estero Diversion Site) Each of the project proponents shall contract a qualified archaeologist meeting the Secretary of the Interior's Qualification Standard (Lead Archaeologist) to prepare and implement an Archaeological Monitoring Plan, and oversee and direct all archaeological monitoring activities during construction. Archaeological monitoring shall be conducted for all subsurface excavation work within 100 feet of Presidio #2 in the Presidio of Monterey, and within the areas of known archaeologically sensitive sites in Monterey.[4] At a minimum, the Archaeological Monitoring Plan shall: • Detail the cultural resources training program that shall be completed by all construction and field workers involved in ground disturbance; • Designate the person(s) responsible for conducting monitoring activities, including Native American monitor(s), if deemed necessary; • Establish monitoring protocols to ensure monitoring is conducted in accordance with current professional standards provided by the California Office of Historic Preservation; • Establish the template and content requirements for monitoring reports; • Establish a schedule for submittal of monitoring reports and person(s) responsible for review and approval of monitoring reports; • Establish protocols for notifications in case of encountering cultural resources, as well as methods for evaluating significance, developing and implementing a plan to avoid or mitigate significant resource impacts, facilitating Native American participation and consultation, implementing a collection and curation plan, and ensuring consistency with applicable laws including Section 7050.5 of the California Health and Safety Code and Section 5097.98 of the Public Resources Code; • Establish methods to ensure security of cultural resources sites; • Describe the appropriate protocols for notifying the County, Native Americans, and local authorities (i.e. Sheriff, Police) should site looting and other illegal activities occur during construction with reference to Public Resources Code 5097.99. During the course of the monitoring, the Lead Archaeologist may adjust the frequency—from continuous to intermittent—of the monitoring based on the conditions and professional judgment regarding the potential to encounter resources. If archaeological materials are encountered, all soil disturbing activities within 100 feet of the find shall cease until the resource is evaluated. The Lead Archaeologist shall immediately notify the relevant Project proponent of the encountered archaeological resource. The Lead Archaeologist shall, after making a reasonable effort to assess the identity, integrity, and significance of the encountered archaeological resource, present the findings of this assessment to the lead agency, or CPUC, for the CalAm Distribution Pipeline. In the event archaeological resources qualifying as either historical resources pursuant to CEQA Section 15064.5 or as unique archaeological resources as defined by Public Resources Code 21083.2 are encountered, preservation in place shall be the preferred manner of mitigation. If preservation in place is not feasible, the applicable project proponent(s) shall implement an Archaeological Research Design and Treatment Plan (ARDTP). The Lead Archaeologist, Native American representatives, and the State Historic Preservation Office designee shall meet to determine the scope of the ARDTP. The ARDTP will identify a program for the treatment and recovery of important scientific data contained within the portions of the archaeological resources located within the project Area of Potential Effects; would preserve any significant historical information obtained; and will identify the scientific/historic research questions applicable to the resources, the data classes the resource is expected to possess, and how the expected data classes would address the applicable research questions. The results of the investigation shall be documented in a technical report that provides a full artifact catalog, analysis of items collected, results of any special studies conducted, and interpretations of the resource within a regional and local context. All technical documents shall be placed on file at the Northwest Information Center of the California Historical Resources Information System.

[3] Note: The Staff-Recommendation Alternative of the GWR Project required that this mitigation measure be modified compared to the version in the Final EIR. Specifically, the text highlighted in gray has been added and the following text deleted: "W. Franklin Street in downtown Monterey." This change to the mitigation measure does not constitute significant new information.

[4] Note: The Staff-Recommendation Alternative of the GWR Project requires that this mitigation measure be modified compared to the version in the Final EIR. Specifically, the text highlighted in gray has been added and the following text deleted: "in downtown Monterey on W. Franklin Street between High and Figueroa Streets, and at potentially sensitive archaeological sites at Lake El Estero."

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
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												Mitigation Measure CR-2b: Discovery of Archaeological Resources or Human Remains. (Applies to all Project components) If archaeological resources or human remains are unexpectedly discovered during any construction, work shall be halted within 50 meters (±160 feet) of the find until it can be evaluated by a qualified professional archaeologist. If the find is determined to be significant, appropriate mitigation measures shall be formulated and implemented. The County Coroner shall be notified in accordance with provisions of Public Resources Code 5097.98-99 in the event human remains are found and the Native American Heritage Commission shall be notified in accordance with the provisions of Public Resources Code section 5097 if the remains are determined to be of Native American origin. **Mitigation Measure CR-2c**: Native American Notification. (Applies to all Project components) Because of their continuing interest in potential discoveries during construction, all listed Native American Contacts shall be notified of any and all discoveries of archaeological resources in the project area.
CR-3: Construction Impacts on Unknown Paleontological Resources. Project construction would not result in damage to or destruction of unknown paleontological resources.	LS	LS	NI	NI	NI	NI	LS	NI	NI	LS	**LS**	None required.
Energy and Mineral Resources (EN)												
EN-1: Construction Impacts due to Temporary Energy Use. Project construction could result in wasteful or inefficient use of energy if construction equipment is not maintained or if haul trips are not planned efficiently. The Project would not conflict with existing energy standards.	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	**LSM**	**Mitigation Measure EN-1**: Construction Equipment Efficiency Plan. (Applies to all Project components) MRWPCA (for all components except the CalAm Distribution System) or CalAm (for the Cal Am Distribution System) shall contract a qualified professional (i.e., construction planner/energy efficiency expert) to prepare a Construction Equipment Efficiency Plan that identifies the specific measures that MRWPCA or CalAm (and its construction contractors) will implement as part of project construction to increase the efficient use of construction equipment. Such measures shall include, but not necessarily be limited to: procedures to ensure that all construction equipment is properly tuned and maintained at all times; a commitment to utilize existing electricity sources where feasible rather than portable diesel-powered generators; consistent compliance with idling restrictions of the state; and identification of procedures (including the use of routing plans for haul trips) that will be followed to ensure that all materials and debris hauling is conducted in a fuel-efficient manner.
EN-2: Operational Impacts due to Energy Use. Project operations would not result in the consumption of energy such that existing supplies would be substantially constrained nor would the Project result in the unnecessary, wasteful, or inefficient use of energy resources.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
EN-3: Operational Impacts on Mineral Resources. The Project would not result in a significant impact due to the loss of availability of known mineral resources of value to the region or to the state or to any locally-important mineral recovery site.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
Geology, Soils, and Seismicity (GS)												
GS-1: Construction-Related Erosion or Loss of Topsoil. Construction of the Project would not result in substantial soil erosion or the loss of topsoil.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
GS-2: Construction-Related Soil Collapse and Soil Constraints during Pipeline Trenching. Construction of some Project pipeline components would be located on geologic units or soils that are unstable, or that may become unstable during project construction, and potentially result in soil instability or collapse; however, this exposure would not result in a substantial risk to people or structures.	LS	LS	NI	NI	LS	LS	NI	LS	LS	LS	**LS**	None required.
GS-3: Exposure to Fault Rupture. The Project would be located in a seismically active area, and portions of the Project may be affected by fault rupture from an earthquake on local faults; however, this exposure would not result in a substantial risk to people or structures.	NI	NI	NI	NI	NI	NI	NI	NI	NI	LS	**LS**	None required.
GS-4: Exposure to Seismic Ground Shaking and Liquefaction. The Project would be located in a seismically active area; however, Project operations would not expose people or structures to a substantial	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.

Impact Statement	Source Water Diversion and Storage Sites: Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
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risk of loss, injury, or death involving exposure to seismic groundshaking and liquefaction.												
GS-5: Exposure to Coastal Erosion and Sea Level Rise. The Proposed CalAm Distribution System Monterey Pipeline would be exposed to substantial soil erosion as a result of sea level rise.	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	**NI**	None required. This impact would only be significant for the proposed Monterey Pipeline. Because the staff-recommended alternative includes the Alternative Monterey Pipeline and not the proposed Monterey Pipeline, this impact would not occur and no mitigation is required.
GS-6: Hydro-Collapse of Soils from Well Injection. Project operation would not create a substantial risk to life or property due to its facilities being located on a geologic unit or soils that are unstable, or that would become unstable as a result of hydro-collapse.	NI	NI	NI	NI	NI	NI	NI	NI	LS	NI	**LS**	None required.
GS-7: Exposure to Expansive and Corrosive Soils. The Project would not result in substantial risks to the public or other facilities due to location on expansive or corrosive soil types.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
Hazards and Hazardous Materials (HH)												
HH-1: Use and Disposal of Hazardous Materials During Construction. Project construction would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during construction.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
HH-2: Accidental Release of Hazardous Materials During Construction. Project construction would potentially cause upset and accident conditions involving the release of hazardous materials into the environment.	LS	LS	LS	LS	LS	LSM	LS	LSM	LSM	LSM	**LSM**	**Mitigation Measure HH-2a**: Environmental Site Assessment. (Applies to the Lake El Estero Diversion, Product Water Conveyance: RUWAP Alignment, Injection Well Facilities and the CalAm Distribution System) If required by local jurisdictions and property owners with approval responsibility for construction of each component, MRWPCA and CalAm shall conduct a Phase I Environmental Site Assessment in conformance with ASTM Standard 1527-05 to identify potential locations where hazardous material contamination may be encountered. If an Environmental Site Assessment indicates that a release of hazardous materials could have affected soil or groundwater quality at a project site, a Phase II environmental site assessment shall be conducted to determine the extent of contamination and to prescribe an appropriate course of remediation, including but not limited to removal of contaminated soils, in conformance with state and local guidelines and regulations. If the results of the subsurface investigation(s) indicate the presence of hazardous materials, additional site remediation may be required by the applicable state or local regulatory agencies, and the contractors shall be required to comply with all regulatory requirements for facility design or site remediation. **Mitigation Measure HH-2b**: Health and Safety Plan. (Applies to the Lake El Estero Diversion, Product Water Conveyance RUWAP Alignment, the Injection Well Facilities, and the CalAm Distribution System) The construction contractor(s) shall prepare and implement a project-specific Health and Safety Plan (HSP) for each site on which construction may occur, in accordance with 29 CFR 1910 to protect construction workers and the public during all excavation, grading, and construction. The HSP shall include the following, at a minimum: • A summary of all potential risks to construction workers and the maximum exposure limits for all known and reasonably foreseeable site chemicals (the HSP shall incorporate and consider the information in all available existing Environmental Site Assessments and remediation reports for properties within ¼-mile using the EnviroStor Database); • Specified personal protective equipment and decontamination procedures, if needed; • Emergency procedures, including route to the nearest hospital; • Procedures to be followed in the event that evidence of potential soil or groundwater contamination (such as soil staining, noxious odors, debris or buried storage containers) is encountered. These procedures shall be in accordance with hazardous waste operations regulations and specifically include, but are not limited to, the following: immediately stopping work in the vicinity of the unknown hazardous materials release, notifying Monterey County Department of Environmental Health, and retaining a qualified environmental firm to perform sampling and remediation; and • The identification and responsibilities of a site health and safety supervisor. **Mitigation Measure HH-2c**: Materials and Dewatering Disposal Plan. (Applies to the Lake El Estero Diversion, Product Water Conveyance System Options, the Injection Well Facilities, and the CalAm Distribution System) MRWPCA and CalAm and/or their contractors shall develop a materials disposal plan specifying how the contractor will remove, handle, transport, and dispose of all excavated material in a safe, appropriate, and lawful manner. The plan must identify the disposal method for soil and the approved disposal site, and include written documentation that the disposal site will accept the waste. For areas within the Seaside munitions response areas called Site 39 (coincident with the Injection Well Facilities component), the materials disposal plans shall be reviewed and approved by FORA and the City of Seaside. The contractor shall develop a groundwater dewatering control and disposal plan specifying how the contractor will remove, handle, and dispose of groundwater impacted by hazardous substances in a safe, appropriate, and lawful manner. The plan must identify the locations at which potential contaminated groundwater dewatering are likely to be encountered (if any), the method to analyze groundwater for hazardous materials, and the appropriate treatment and/or disposal methods. If the dewatering effluent contains contaminants that exceed the requirements of the General WDRs for Discharges with a Low Threat to Water Quality (Order No. R3-2011-0223, NPDES Permit No. CAG993001), the construction contractor shall contain the dewatering effluent in a portable holding tank for

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
KEY TO ACRONYMS: NI – No Impact; LS – Less than Significant; LSM – Less than Significant with Mitigation; SU – Significant and Unavoidable; BI- Beneficial Impact												
												appropriate offsite disposal or discharge (see Section 4.11, Hydrology and Water Quality: Surface Water, for more information regarding this NPDES permit). The contractor can either dispose of the contaminated effluent at a permitted waste management facility or discharge the effluent, under permit, to the Regional Treatment Plant.
HH-3: Construction of Facilities on Known Hazardous Materials Site. Project construction would occur on a known hazardous materials site pursuant to Government Code Section 65962.5; however, the Project would not result in a significant hazard to people or the environment.	NI	NI	NI	NI	NI	NI	NI	LS	LS	LS	**LS**	None required.
HH-4: Use of Hazardous Materials During Construction Within 0.25-Miles of Schools. Project construction would not result in nor create a significant hazard to the public or the environment due to handling of hazardous materials or hazardous emissions within 0.25 mile of a school during construction.	NI	NI	NI	NI	NI	NI	LS	LS	LS	NI	**LS**	None required.
HH-5: Wildland Fire Hazard during Construction. Project construction would not increase the risk of wildland fires in high fire hazard areas.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
HH-6: Use and Disposal of Hazardous Materials During Operation. Project operations would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
HH-7: Operation of Facilities on Known Hazardous Materials Site. Project facilities would be located on a known hazardous materials site; however, the Project would not result in a significant hazard to people or the environment.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
Hydrology and Water Quality: Groundwater (GW)												
GW-1: Construction Groundwater Depletion, Levels, and Recharge. Construction of the Project components would not deplete groundwater supplies nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of local groundwater levels.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
GW-2: Construction Groundwater Quality. Project construction would not violate any water quality standards or otherwise degrade water quality.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
GW-3: Operational Groundwater Depletion and Levels: Salinas Valley Groundwater Basin. Operation of the Project would not deplete groundwater supplies in the Salinas Valley nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater levels in the Salinas Valley Groundwater Basin.	LS	LS	LS	LS	NI	NI	BI	NI	NI	NI	**BI**	None required.
GW-4: Operational Groundwater Depletion and Levels: Seaside Basin. Operation of the Project would not deplete groundwater supplies in the Seaside Basin nor interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater levels in the Seaside Basin.	NI	NI	NI	NI	NI	NI	NI	NI	LS	NI	**LS**	None required.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites: Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
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GW-5: Operational Groundwater Quality: Salinas Valley. Operation of the Project would not degrade groundwater quality in the Salinas Valley.	BI	BI	LS	LS	LS	NI	BI	NI	NI	NI	**BI**	None required.
GW-6: Operational Groundwater Quality: Seaside Basin. Project operations would not degrade groundwater quality in the Seaside Basin, including due to injection of purified recycled water into the basin.	NI	NI	NI	NI	NI	NI	BI/ LS[4]	NI	BI/ LS[4]	NI	**BI/ LS[5]**	None required.
Hydrology and Water Quality: Surface Water (HS)												
HS-1: Construction Impacts to Surface Water Quality due to Discharges. Project construction involving well drilling and development, and dewatering of shallow groundwater during excavation would generate water requiring disposal. Compliance with existing regulatory requirements would ensure that water disposal during construction would not violate any water quality standards or waste discharge requirements, would not cause substantial erosion or siltation, and would not otherwise substantially degrade surface water quality.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
HS-2: Construction Impacts to Surface Water Quality due to Earthmoving, Drainage Alterations, and Use of Hazardous Chemicals. Project construction would not violate any water quality standards or waste discharge requirements, would not cause substantial erosion or siltation, and would not otherwise substantially degrade surface water quality including marine water quality, due to earthmoving, drainage system alterations, and use of hazardous chemicals.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
HS-3: Operational Impacts to Surface Water Quality due to Well Maintenance Discharges. Project operations would not violate any water quality standards or waste discharge requirements, would not cause substantial erosion or siltation, and would not otherwise substantially degrade surface water quality due to well maintenance discharges.	NI	NI	NI	NI	NI	NI	NI	NI	LS	NI	**LS**	None required.
HS-4: Operational Surface Water Quality Impacts due to Source Water Diversions. Project diversions would result in water quality benefits due to diversion and treatment of polluted waters; however, rapid water fluctuation from diversions at the Reclamation Ditch could induce erosion and sedimentation in downstream waters.	LS	LS	LSM	LS	LS	LS	NI	NI	NI	NI	**LSM**	**Mitigation Measure HS-4**: Management of Surface Water Diversion Operations (Applies to Reclamation Ditch Diversion, only) Rapid, imposed water-level fluctuations shall be avoided when operating the Reclamation Ditch Diversion pumps to minimize erosion and failure of exposed (or unvegetated), susceptible banks. This can be accomplished by operating the pumps at an appropriate flow rate, in conjunction with commencing operation of the pumps only when suitable water levels or flow rates are measured in the water body. Proper control shall be implemented to ensure that mobilized sediment would not impair downstream habitat values and to prevent adverse impacts due to water/soil interface adjacent to the Reclamation Ditch and Tembladero Slough. During planned routine maintenance at the Reclamation Ditch Diversion, maintenance personnel shall inspect the diversion structures within the channel for evidence of any adverse fluvial geomorphological processes (for example, undercutting, erosion, scour, or changes in channel cross-section). If evidence of any substantial adverse changes are noted, the diversion structure shall be redesigned and the project proponents shall modify it in accordance with the new design.

[5] For concentrations of total dissolved solids and chloride, the impact would be beneficial; for all other water quality parameters, the impact would be less than significant.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
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HS-5: Operational Marine Water Quality due to Ocean Discharges. Project operational discharges of reverse osmosis concentrate to the ocean through the MRWPCA outfall would not violate water quality standards or waste discharge requirements, or otherwise substantially degrade water quality.	BI	BI	BI	BI	BI	BI	LS	NI	NI	NI	**LS**	None required.
HS-6: Operational Drainage Pattern Alterations. The Project would alter existing drainage patterns of the component sites by increasing impervious surfaces, but would not substantially increase the rate or amount of runoff such that it would: (1) cause erosion or siltation on- or off-site, (2) cause flooding on- or offsite, or (3) exceed the existing storm drainage system capacity.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
HS-7: Operational Carmel River Flows. Project operations would result in reduced pumping of the Carmel River alluvial aquifer resulting in increased flows in Carmel River that would benefit habitat for aquatic and terrestrial species.	NI	NI	NI	NI	NI	NI	NI	NI	NI	NI	**BI**	None required.
HS-8: Operational Risks due to Location within 100-Year Flood Area. Portions of the Project would be located within a 100-year flood hazard area but would not impede or redirect flood flows.	LS	LS	LS	LS	LS	LS	NI	LS	LS	NI	**LS**	None required.
HS-9: Operational Risks due to Flooding due to Levee/Dam Failure, or Coastal Inundation. During operations, some Project facilities may be exposed to flooding due to failure of a levee or dam, sea level rise, and storm surges/tides related to climate change, but this exposure would not pose a substantial nor significant risk of loss, injury, or death.	LS	LS	NI	LS	LS	LS	NI	NI	NI	LS	**LS**	None required.
HS-10: Operational Seiche, Tsunami, or Mudflow Risk. The Project operations would not expose people or structures to substantial risk from flooding due to a seiche, tsunami, or mudflow.	NI	NI	NI	LS	LS	LS	NI	NI	NI	LS	**LS**	None required.
Land Use, Agriculture, and Forest Resources (LU)												
LU-1: Temporary Farmland Conversion during Construction. The Project would result in a temporary disruption to agricultural production on designated prime, unique and statewide important farmlands during construction, but would not directly or indirectly convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use.	NI	LSM	NI	NI	LSM	NI	NI	LS	NI	NI	**LSM**	**Mitigation Measure LU-1**: Minimize Disturbance to Farmland. (Applies to the Salinas Treatment Facility and a portion of the Blanco Drain Diversion) To support the continued productivity of designated Prime Farmland and Farmland of Statewide Importance, the following provisions shall be included in construction contract specifications: • Construction contractor(s) shall minimize the extent of the construction disturbance, including construction access and staging areas, in designated important farmland areas. • Prior to the start of construction, the construction contractor(s) shall mark the limits of the construction area and ensure that no construction activities, parking, or staging occur beyond the construction limits. • Upon completion of the active construction, the site shall be restored to pre-construction conditions.
LU-2: Operational Consistency with Plans, Policies, and Regulations. The Project would have one or more components that would potentially conflict, or be inconsistent with, applicable land use plans, policies, and regulations without implementation of mitigation measures identified in this EIR.	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	**LSM**	See other applicable mitigation measures in this table by component. See also, Table 4.12-4 of the Draft EIR for a complete list of mitigation measures by policy and topic.
LU-3: Operational Indirect Farmland Conversion. The Project would not change the existing environment such that Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is converted to non-	LS	LS	LS	LS	LS	LS	LS	NI	NI	NI	**LS**	None required.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites: Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
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agricultural use.												
Marine Biological Resources (MR)												
MR-1: Operational Impacts on Marine Biological Resources. Operation of the Project would not result in substantial adverse effects on candidate, sensitive, or special-status species and would not interfere substantially with the movement of any native resident or migratory fish or wildlife species.	BI	BI	BI	BI	BI	BI	LS	NI	NI	NI	**LS**	None required.
Noise and Vibration (NV)												
NV-1: Construction Noise. Construction activity would result in a temporary increase in ambient noise levels in the vicinity of all Project sites during construction that would not be substantial at most construction sites, except at the Injection Well Facilities and CalAm Distribution System: Improvements: Alternative Monterey Pipeline sites.	LS	LS	LS	LS	LS	LS	LS	LS	LSM	SU	**SU**	**Mitigation Measure NV-1a**: Drilling Contractor Noise Measures. (Applies to Injection Well Facilities) Contractor specifications shall include a requirement that drill rigs located within 700 feet of noise-sensitive receptors shall be equipped with noise reducing engine housings or other noise reducing technology and the line of sight between the drill rig and nearby sensitive receptors shall be blocked by portable acoustic barriers and/or shields to reduce noise levels such that drill rig noise levels are no more 75 dBA at 50 feet. This would reduce the nighttime noise level to less than 60 dBA Leq at the nearest residence. The contractor shall submit to the MRWPCA and the Seaside Building Official, a "Well Construction Noise Control Plan" for review and approval. The plan shall identify all feasible noise control procedures that would be implemented during night-time construction activities. At a minimum, the plan shall specify the noise control treatments to achieve the specified above noise performance standard. **Mitigation Measure NV-1b**: Monterey Pipeline Noise Control Plan for Nighttime Pipeline Construction. (Applies to CalAm Distribution System: Alternative Monterey Pipeline) CalAm shall submit a Noise Control Plan for all nighttime pipeline work to the California Public Utilities Commission for review and approval prior to the commencement of project construction activities. The Noise Control Plan shall identify all feasible noise control procedures to be implemented during nighttime pipeline installation in order to reduce noise levels to the extent practicable at the nearest residential or noise sensitive receptor. At a minimum, the Noise Control Plan shall require use of moveable noise screens, noise blankets, or other suitable sound attenuation devices be used to reduce noise levels during nighttime pipeline installation activities. **Mitigation Measure NV-1c**: Neighborhood Notice. (Applies to Injection Well Facilities and CalAm Distribution System: Alternative Monterey Pipeline) Residences and other sensitive receptors within 900 feet of a nighttime construction area shall be notified of the construction location and schedule in writing, at least two weeks prior to the commencement of construction activities. The notice shall also be posted along the proposed pipeline alignments, near the proposed facility sites, and at nearby recreational facilities. The contractor shall designate a noise disturbance coordinator who would be responsible for responding to complaints regarding construction noise. The coordinator shall determine the cause of the complaint and ensure that reasonable measures are implemented to correct the problem. A contact number for the noise disturbance coordinator shall be conspicuously placed on construction site fences and included in the construction schedule notification sent to nearby residences. The notice to be distributed to residences and sensitive receptors shall first be submitted, for review and approval, to the MRWPCA and city and county staff as may be required by local regulations. **Mitigation Measure NV-1d:** RUWAP Pipeline Construction Noise. (Applies to the RUWAP Alignment Option of the Product Water Conveyance) The following measures will be implemented by the project proponents in response to comments from the Marina Coast Water District if the RUWAP alignment option of the Product Water Conveyance Pipeline is selected for implementation. • The construction contractor shall limit exterior construction related activities to the hours of restriction consistent with the noise ordinance of, and encroachment permits issued by, the relevant land use jurisdictions. • The contractor shall locate all stationary noise-generating equipment as far as possible from nearby noise-sensitive receptors. Where possible, noise generating equipment shall be shielded from nearby noise-sensitive receptors by noise-attenuating buffers. Stationary noise sources located 500 feet from noise-sensitive receptors shall be equipped with noise reducing engine housings. Where possible and required by the local jurisdiction, portable acoustic barriers shall be placed around stationary noise generating equipment that is located less than 200 feet from noise-sensitive receptors. • The contractor shall assure that construction equipment powered by gasoline or diesel engines have sound control devices at least as effective as those provided by the original equipment manufacturer (OEM). No equipment shall be permitted to have an unmuffled exhaust. • The contractor shall assure that noise-generating mobile equipment and machinery are shut-off when not in use. • Residences within 500 feet of a construction area shall be notified of the construction schedule in writing, prior to construction. The project proponent(s) and contractor shall designate a noise disturbance coordinator who would be responsible for responding to complaints regarding construction noise. The coordinator shall determine the cause of the complaint and ensure that reasonable measures are implemented to correct the problem. A contact number for the noise disturbance coordinator shall be conspicuously placed on construction site fences and written into the construction notification schedule sent to nearby residences.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
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NV-2: Construction Noise That Exceeds or Violate Local Standards. Construction activity would result in a temporary increase that at some locations could generate noise levels in excess of standards established in the local general plans and/or could violate local regulations.	NI	NI	LSM	SU	LSM	NI	NI	LSM	NI	NI	**SU**	**Mitigation Measure NV-2a**: Construction Equipment. (Applies to Source Water Diversion and Storage Sites – Reclamation Ditch, Tembladero Slough and Blanco Drain, Product Water Conveyance Pipeline segments within the City of Marina and RUWAP Booster Station) Contractor specifications shall include a requirement that the contractor shall: - Assure that construction equipment with internal combustion engines has sound control devices at least as effective as those provided by the original equipment manufacturer. No equipment shall be permitted to have an un-muffled exhaust. - Impact tools (i.e., jack hammers, pavement breakers, and rock drills) used for project construction shall be hydraulically or electrically powered wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatic tools is unavoidable, an exhaust muffler shall be placed on the compressed air exhaust to lower noise levels by approximately 10 dBA. External jackets shall be used on impact tools, where feasible, in order to achieve a further reduction of 5 dBA. Quieter procedures shall be used, such as drills rather than impact equipment, whenever feasible. - The construction contractor(s) shall locate stationary noise sources (e.g., generators, air compressors) as far from nearby noise-sensitive receptors as possible, - For Product Water Conveyance pipeline segments within the City of Marina, noise controls shall be sufficient to not exceed 60 decibels for more than twenty-five percent of an hour, **Mitigation Measure NV-2b:** Construction Hours. (Applies to Product Water Conveyance Pipelines and Booster Pump Station in the City of Marina). The construction contractor shall limit all noise-producing construction activities within the City of Marina to between the hours of 7:00 AM and 7:00 PM on weekdays and between 9:00 AM and 7:00 PM Saturdays.
NV-3: Construction Vibration. Construction of the Project would not expose sensitive receptors to excessive groundborne vibration.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
NV-4: Operational Noise. Operation of the Project facilities would potentially increase existing noise levels, but would not exceed noise level standards and/or result in nuisance impacts at sensitive receptors.	NI	LS	LS	LS	LS	LS	LS	LS	LS	NI	**LS**	None required.
Population and Housing (PH)												
PH-1: Construction-Related Growth Inducement. Project construction would result in temporary increases in construction employment, but would not induce substantial population growth.	-	-	-	-	-	-	-	-	-	-	**LS**	None required.
PH-2: Operations and Infrastructure-Related Growth Inducement. Operation of the Project would not directly result in population growth, and would not indirectly result in inducement of substantial population growth.	-	-	-	-	-	-	-	-	-	-	**LS**	None required.
Public Services, Utilities, and Recreation (PS)												
PS-1: Construction Public Services Demand. Construction of the Project would not result in public service demands for fire and police protection services, schools, or parks that would result in the need for new or physically altered facilities to maintain service capacity or performance objectives.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
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PS-2: Construction Landfill Capacity. Construction of the Project would result in generation of solid waste; however, the solid waste would be disposed at a landfill with sufficient permitted daily and overall capacity to accommodate the project's solid waste disposal needs.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
PS-3: Construction Solid Waste Policies and Regulations. Construction of the Project would potentially conflict with state and local statutes, policies and regulations related to solid waste.	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	**LSM**	**Mitigation Measure PS-3**: Construction Waste Reduction and Recycling Plan (relevant to all Project components). The construction contractor(s) shall prepare and implement a construction waste reduction and recycling plan identifying the types of construction debris the Project will generate and the manner in which those waste streams will be handled. In accordance with the California Integrated Waste Management Act of 1989, the plan shall emphasize source reduction measures, followed by recycling and composting methods, to ensure that construction and demolition waste generated by the project is managed consistent with applicable statutes and regulations. In accordance with the California Green Building Standards Code and local regulations, the plan shall specify that all trees, stumps, rocks, and associated vegetation and soils, and 50% of all other nonhazardous construction and demolition waste, be diverted from landfill disposal. The plan shall be prepared in coordination with the Monterey Regional Waste Management District and be consistent with Monterey County's Integrated Waste Management Plan. Upon project completion, MRWPCA and CalAm shall collect the receipts from the contractor(s) to document that the waste reduction, recycling, and diversion goals have been met.
PS-4: Public Services Demand During Operation. Operation of the Project would not result in public service demands for fire and police protection services, schools, or parks that would result in the need for new or physically altered facilities to maintain service capacity or performance objectives.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
PS-5: Landfill Capacity for Operations. Operation of the Project would not result in adverse effects on landfill capacity or be out of compliance with federal, state, and local statutes and regulations related to solid waste.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
Traffic and Transportation (TR)												
TR-1: Construction Traffic. Project construction would result in a temporary increase in traffic volumes on regional and local roadways due to construction-related vehicle trips, which would not result in conflicts with any applicable plan, ordinance, or policy establishing measures of effectiveness for performance of the circulation system.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
TR-2: Construction-Related Traffic Delays, Safety and Access Limitations. Construction activities could result in temporary traffic delays, safety hazards, and/or disruption of access.	LS	LS	LS	LS	LS	NI	LS	LSM	NI	LSM	**LSM**	**Mitigation Measure TR-2**: Traffic Control and Safety Assurance Plan. Prior to construction, MRWPCA and/or its contractor shall prepare and implement a traffic control plan or plans for the roadways and intersections affected by MRWPCA construction (Product Water Conveyance Pipeline) and CalAm shall prepare and implement a traffic control plan for the roadways and intersections affected by the CalAm Distribution System Improvements (Alternative Monterey pipelines). The traffic control plan(s) shall comply with the affected jurisdiction's encroachment permit requirements and will be based on detailed design plans. For all project construction activities that could affect the public right-of-way (e.g., roadways, sidewalks, and walkways), the plan shall include measures that would provide for continuity of vehicular, pedestrian, and bicyclist access; reduce the potential for traffic accidents; and ensure worker safety in construction zones. Where project construction activities could disrupt mobility and access for bicyclists and pedestrians, the plan shall include measures to ensure safe and convenient access would be maintained. The traffic control and safety assurance plan shall be developed on the basis of detailed design plans for the approved project. The plan shall include, but not necessarily be limited to, the elements listed below: **General** a. Develop circulation and detour plans to minimize impacts on local streets. As necessary, signage and/or flaggers shall be used to guide vehicles to detour routes and/or through the construction work areas. b. Implement a public information program to notify motorists, bicyclists, nearby residents, and adjacent businesses of the impending construction activities (e.g., media coverage, email notices, websites, etc.). Notices of the location(s) and timing of lane closures shall be published in local newspapers and on available websites to allow motorists to select alternative routes. **Roadways** c. Haul routes that minimize truck traffic on local roadways and residential streets shall be used to the extent feasible. d. Schedule truck trips outside of peak morning and evening commute hours to minimize adverse impacts on traffic flow. e. Limit lane closures during peak hours. Travel lane closures, when necessary, shall be managed such that one travel lane is kept open at all times to allow

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites: Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero	Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
KEY TO ACRONYMS: NI – No Impact; LS – Less than Significant; LSM – Less than Significant with Mitigation; SU – Significant and Unavoidable; BI- Beneficial Impact												
												alternating traffic flow in both directions along affected two-lane roadways. In the City of Marina, one-way traffic shall be limited to a maximum of 5 minutes of traffic delay. f. Restore roads and streets to normal operation by covering trenches with steel plates outside of normal work hours or when work is not in progress. g. Comply with roadside safety protocols to reduce the risk of accidents. Provide "Road Work Ahead" warning signs and speed control (including signs informing drivers of state legislated double fines for speed infractions in a construction zone) to achieve required speed reductions for safe traffic flow through the work zone. Train construction personnel to apply appropriate safety measures as described in the plan. h. Provide flaggers in school areas at street crossings to manage traffic flow and maintain traffic safety during the school drop-off and pickup hours on days when pipeline installation would occur in designated school zones. i. Maintain access to private driveways. j. Coordinate with MST so the transit provider can temporarily relocate bus routes or bus stops in work zones as deemed necessary. Pedestrian and Bicyclists k. Perform construction that crosses on street and off street bikeways, sidewalks, and other walkways in a manner that allows for safe access for bicyclists and pedestrians. Alternatively, provide safe detours to reroute affected bicycle/pedestrian traffic. **Recreational Trails** l. At least two weeks prior to construction, post signage along all potentially affected recreational trails; Class I, II, and II bicycle routes; and pedestrian pathways, including the Monterey Peninsula Recreational Trail, to warn bicyclists and pedestrians of construction activities. The signs shall include information regarding the nature of construction activities, duration, and detour routes. Signage shall be composed of or encased in weatherproof material and posted in conspicuous locations, including on park message boards, and existing wayfinding signage and kiosks, for the duration of the closure period. At the end of the closure period, CalAm, MRWPCA or either of its contractors shall retrieve all notice materials. **Emergency Access** m. Maintain access for emergency vehicles at all times. Coordinate with facility owners or administrators of sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. n. Provide advance notification to local police, fire, and emergency service providers of the timing, location, and duration of construction activities that could affect the movement of emergency vehicles on area roadways. o. Avoid truck trips through designated school zones during the school drop-off and pickup hours.
TR-3: Construction-Related Roadway Deterioration. Construction truck trips could result in increased wear-and-tear on the designated haul routes, which could result in temporary impacts to performance of the regional circulation system.	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	LSM	**LSM**	**Mitigation Measure TR-3**: Roadway Rehabilitation Program (applies to all Project components) Prior to commencing project construction, MRWPCA (for all components other than the CalAm Distribution System Improvements) and CalAm (for CalAm Distribution System Improvements: Alternative Monterey Pipeline) shall detail the preconstruction condition of all local construction access and haul routes proposed for substantial use by project-related construction vehicles. The construction routes surveyed must be consistent with those identified in the construction traffic control and safety assurance plan developed under Mitigation Measure TR-2. After construction is completed, the same roads shall be surveyed again to determine whether excessive wear and tear or construction damage has occurred. Roads damaged by project-related construction vehicles shall be repaired to a structural condition equal to, or greater than, that which existed prior to construction activities. In the City of Marina, the construction in the city rights-way must comply with the City's design standards, including restoration of the streets from curb to curb, as applicable. In the City of Monterey, asphalt pavement of full travel lanes will be resurfaced without seams along wheel or bike paths.
TR-4: Construction Parking Interference. Construction activities may temporarily affect parking availability.	NI	NI	NI	NI	NI	LSM	NI	LSM	NI	LSM	**LSM**	**Mitigation Measure TR-4**: Construction Parking Requirements.(Applies to Product Water Conveyance: RUWAP Alignment in Marina and Seaside, and CalAm Distribution System: Alternative Monterey Pipeline). Prior to commencing project construction, the construction contractor(s) shall coordinate with the potentially affected jurisdictions to identify designated worker parking areas that would avoid or minimize parking displacement in congested areas of Marina, Seaside, and downtown Monterey. The contractors shall provide transport between the designated parking location and the construction work areas. The construction contractor(s) shall also provide incentives for workers that carpool or take public transportation to the construction work areas. The engineering and construction design plans shall specify that contractors limit time of construction within travel lanes and public parking spaces and provide information to the public about locations of alternative spaces to reduce parking disruptions.
TR-5: Operational Traffic. Operation and maintenance of the Project would result in small traffic increases on regional and local roadways, but would not substantially affect the performance of the regional circulation system.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
Water Supply and Wastewater Systems (WW)												
WW-1: Construction-Related Water Demand. The Project would result in a temporary increase in water use due to construction-related demands, but existing water supplies would be sufficient to serve construction-related demands and construction activities would not require new or expanded water supply resources or entitlements.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.

Exhibit A (continued)

Impact Statement	Source Water Diversion and Storage Sites						Treatment Facilities at Regional Treatment Plant	Product Water Conveyance RUWAP Alignment Option	Injection Well Facilities	CalAm Distribution System: Alternative Monterey Pipeline	Project Overall	Mitigation Measures
	Salinas Pump Station	Salinas Treatment Facility Storage and Recovery	Reclamation Ditch	Tembladero Slough	Blanco Drain (Pump Station and Pipeline)	Lake El Estero						
KEY TO ACRONYMS: NI – No Impact; LS – Less than Significant; LSM – Less than Significant with Mitigation; SU – Significant and Unavoidable; BI- Beneficial Impact												
WW-2: Construction-Related Wastewater Generation. The Project would result in a temporary increase in wastewater generation due to demand from construction workers, but existing wastewater treatment facilities have sufficient capacity to serve construction-related demands.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
WW-3: Operational Water Supply and Entitlements. Sufficient water supplies are available for operation of the Project; prior to construction of each source water diversion component and prior to diversion of secondary treated effluent, the project proponents would obtain applicable water rights, permits, or agreements.	LS	LS	LS	LS	LS	LS	LS	LS	LS	LS	**LS**	None required.
WW-4: Operational Wastewater Treatment Capacity. Operation of the Project would not result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments.	LS	LS	LS	LS	LS	LS	LS	LS	LS	NI	**LS**	None required.

Mitigation Measures for Impact BT-1: Construction Impacts to Special-Status Species and Habitat

Mitigation Measure BT-1a: Implement Construction Best Management Practices. (Applies to All Project Components) The following best management practices shall be implemented during all identified phases of construction (i.e., pre-, during, and post-) to reduce impacts to special-status plant and wildlife species:

1. A qualified biologist must conduct an Employee Education Program for the construction crew prior to any construction activities. A qualified biologist must meet with the construction crew at the onset of construction at the site to educate the construction crew on the following: 1) the appropriate access route(s) in and out of the construction area and review project boundaries; 2) how a biological monitor will examine the area and agree upon a method which would ensure the safety of the monitor during such activities, 3) the special-status species that may be present; 4) the specific mitigation measures that will be incorporated into the construction effort; 5) the general provisions and protections afforded by the USFWS and CDFW; and 6) the proper procedures if a special-status species is encountered within the site.
2. Trees and vegetation not planned for removal or trimming shall be protected prior to and during construction to the maximum extent possible through the use of exclusionary fencing, such as hay bales for herbaceous and shrubby vegetation, and protective wood barriers for trees. Only certified weed-free straw shall be used, to avoid the introduction of non-native, invasive species. A biological monitor shall supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.
3. Protective fencing shall be placed prior to and during construction to keep construction equipment and personnel from impacting vegetation outside of work limits. A biological monitor shall supervise the installation of protective fencing and monitor at least once per week until construction is complete to ensure that the protective fencing remains intact.
4. Following construction, disturbed areas shall be restored to pre-construction contours to the maximum extent possible and revegetated using locally-occurring native species and native erosion control seed mix, per the recommendations of a qualified biologist.
5. Grading, excavating, and other activities that involve substantial soil disturbance shall be planned and carried out in consultation with a qualified hydrologist, engineer, or erosion control specialist, and shall utilize standard erosion control techniques to minimize erosion and sedimentation to native vegetation (pre-, during, and post-construction).
6. No firearms shall be allowed on the construction sites at any time.
7. All food-related and other trash shall be disposed of in closed containers and removed from the project area at least once a week during the construction period, or more often if trash is attracting avian or mammalian predators. Construction personnel shall not feed or otherwise attract wildlife to the area.
8. To protect against spills and fluids leaking from equipment, the project proponent shall require that the construction contractor maintains an on-site spill plan and on-site spill containment measures that can be easily accessed.
9. Refueling or maintaining vehicles and equipment should only occur within a specified staging area that is at least 100 feet from a waterbody (including riparian and wetland habitat) and that has sufficient management measures that will prevent fluids or other construction materials including water from being transported into waters of the state. Measures shall include confined concrete washout areas, straw wattles placed around stockpiled materials and plastic sheets to cover materials from becoming airborne or otherwise transported due to wind or rain into surface waters.
10. The project proponent and/or its contractors shall coordinate with the City of Seaside on the location of Injection Well Facilities and the removal of sensitive biotic material.

Mitigation Measure BT-1b: Implement Construction-Phase Monitoring. (Applies to Salinas Pump Station, Salinas Treatment Facility, Blanco Drain Diversion, Project Water Conveyance: RUWAP Alignment Option, Injection Well Facilities) The project proponents shall retain a qualified biologist to monitor all ground disturbing construction activities (i.e., vegetation removal, grading, excavation, or similar activities) to protect any special-status species encountered. Any handling and relocation protocols of special-status wildlife species shall be determined in coordination with CDFW prior to any ground disturbing activities, and conducted by a qualified biologist with appropriate scientific collection permit. After ground disturbing project activities are complete, the qualified biologist shall train an individual from the construction crew to act as the on-site construction biological monitor. The construction biological monitor shall be the contact for any special-status wildlife species encounters, shall conduct daily inspections of equipment and materials stored on site and any holes or trenches prior to the commencement of work, and shall ensure that all installed fencing stays in place throughout the construction period. The qualified biologist shall then conduct regular scheduled and unscheduled visits to ensure the construction biological monitor is satisfactorily implementing all appropriate mitigation protocols. Both the qualified biologist and the construction biological monitor shall have the authority to stop and/or redirect project activities to ensure protection of resources and compliance with all environmental permits and conditions of the project. The qualified biologist and the construction monitor shall complete a daily log summarizing activities and environmental compliance throughout the duration of the project. The log shall also include any special-status wildlife species observed and relocated.

Mitigation Measure BT-1c: Implement Non-Native, Invasive Species Controls. (Applies to All Project Components, except Alternative Monterey Pipeline) The following measures shall be implemented to reduce the introduction and spread of non-native, invasive species:

1. Any landscaping or replanting required for the project shall not use species listed as noxious by the California Department of Food and Agriculture (CDFA).
2. Bare and disturbed soil shall be landscaped with CDFA recommended seed mix or plantings from locally adopted species to preclude the invasion on noxious weeds in the Project Study Area.
3. Construction equipment shall be cleaned of mud or other debris that may contain invasive plants and/or seeds and inspected to reduce the potential of spreading noxious weeds, before mobilizing to arrive at the construction site and before leaving the construction site.
4. All non-native, invasive plant species shall be removed from disturbed areas prior to replanting.

Mitigation Measure BT-1d: Conduct Pre-Construction Surveys for California Legless Lizard. (Applies to the Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station, and Injection Well Facilities) The project proponents shall retain a qualified biologist to prepare and implement a legless lizard management plan in coordination with CDFW, which shall include, but is not limited to, the protocols for pre-construction surveys, construction monitoring, and salvage and relocation. The management plan shall include, but is not limited to, the following:

- *Pre-Construction Surveys*. Pre-construction surveys for legless lizards shall be conducted in all suitable habitat proposed for construction, ground disturbance, or staging. The qualified biologist shall hold or obtain a CDFW scientific collection permit for this species. The pre-construction surveys shall use a method called “high-grading.” The high grading method shall include surveying the habitat where legless lizards are most likely to be found, and the survey must occur under the conditions when legless lizards are most likely to be seen and captured (early morning, high soil moisture, overcast, etc.). The intensity of a continued search may then be adjusted, based on the results of the first survey in the best habitat. A “three pass method” shall be used to locate and remove as many legless lizards as possible. A first pass shall locate as many legless lizards as possible, a second pass should locate fewer lizards than the first pass, and a third pass should locate fewer lizards than the second pass. All search passes shall be conducted in the early morning when legless lizards are easiest to capture. Vegetation may be removed by hand to facilitate hand raking and search efforts for legless lizards in the soil under brush. If lizards are found during the first pass, an overnight period of no soil disturbance must occur before the second pass, and the same requirement shall be implemented after the second pass. If no lizards are found during the second pass, a

third pass is not required. Installation of a barrier, in accordance with the three pass method, shall be required if legless lizards are found at the limits of construction (project boundaries) and sufficient soft sand and vegetative cover are present to suspect additional lizards are in the immediate vicinity on the adjacent property. A barrier shall prevent movement of legless lizards into the property. All lizards discovered shall be handled according to the salvage procedures outlined below.

- *Construction Monitoring*. Monitoring by a qualified biologist shall be ongoing during construction. The onsite monitor shall be present during all ground-disturbing construction activities. To facilitate the careful search for lizards during construction, vegetation may need to be removed. If removal by hand is impractical, equipment such as a chainsaw, string trimmer, or skid-steer may be used, if a monitor and crew are present. The task of the vegetation removal is to remove plants under the direction of the monitor, allowing the monitor to watch for legless lizards. After plants are removed, the monitor and crew shall search the exposed area for legless lizards. If legless lizards are found during pre-construction surveys or construction monitoring, the protocols for salvage and relocation identified below shall be followed. Upon completion of pre-construction surveys, construction monitoring, and any resulting salvage and relocation actions, a report shall be submitted to the CDFW. The CDFW must be notified at least 48 hours before any field activity begins.

- *Salvage and Relocation*. Only experienced persons may capture or handle legless lizards. The monitor must demonstrate a basic understanding, knowledge, skill, and experience with this species and its habitat. Once captured, a lizard shall be placed in a lidded, vented box containing clean sand. Areas of moist and dry sand need to be present in the box. The boxes must be kept out of direct sunlight and protected from temperatures over 72°F. The sand must be kept at temperatures under 66°F. Ideal temperatures are closer to 60°F. On the same day as capture, the lizards shall be examined for injury and data recorded on location where found as well as length, color, age, and tail condition. Once data is recorded, lizards shall be relocated to appropriate habitat, as determined through coordination with the CDFW, qualified biologist, and potential landowners.

Suitability of habitat for lizard release must be evaluated and presented in a management plan. The habitat must contain habitat factors most important to the health and survival of the species such as appropriate habitat based on soils, vegetated cover, native plant species providing cover, plant litter layer and depth, soil and ambient temperature, quality and composition of invertebrate population and prey availability. Potential relocation sites that contain the necessary conditions may exist within the habitat reserves on the former Fort Ord, including the Fort Ord National Monument. Lizards shall be marked with a unique tag (pit or tattoo) prior to release. Release for every lizard shall be recorded with GPS. GPS locations shall be submitted as part of the survey result report to document the number and locations of lizards relocated.

Mitigation Measure BT-1e: Prepare and Implement Rare Plant Restoration Plan to Mitigate Impacts to Sandmat Manzanita, Monterey Ceanothus, Monterey Spineflower, Eastwood's Goldenbush, Coast Wallflower, and Kellogg's Horkelia. (Applies to Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station, and Injection Well Facilities; does not apply to HMP species within the former Fort Ord) Impacts to rare plant species individuals shall be avoided through project design and modification, to the extent feasible while taking into consideration other site and engineering constraints. If avoidance is not possible, the species shall be replaced at a 1:1 ratio for area of impact through preservation, restoration, or combination of both. A Rare Plant Restoration Plan, approved by the lead agency prior to commencing construction on the component site upon which the rare plant species would be impacted, shall be prepared and implemented by a qualified biologist. The plan shall include, but is not limited to, the following:

a. A detailed description of on-site and/or off-site mitigation areas, salvage of seed and/or soil bank, plant salvage, seeding and planting specifications, including, if appropriate, increased planting ratio to ensure the applicable success ratio. Specifically, seed shall be collected from the on-site individuals that would be impacted and grown in a local greenhouse, and then transplanted within the mitigation area. Plants shall be transplanted while they are young seedlings in order to develop a good root system. Alternatively, the mitigation area may be broadcast seeded in fall; however, if this method is used, some seed shall be retained in the event that the seeding fails to produce viable plants and contingency measures need to be employed.
b. A description of a 3-year monitoring program, including specific methods of vegetation monitoring, data collection and analysis, restoration goals and objectives, success criteria, adaptive management if the criteria are not met, reporting protocols, and a funding mechanism.

The mitigation area shall be preserved in perpetuity through a conservation easement or other legally enforceable land preservation agreement. Exclusionary fencing shall be installed around the mitigation area to prevent disturbance until success criteria have been met.

Mitigation Measure BT-1f: Conduct Pre-Construction Protocol-Level Botanical Surveys within the remaining portion of the Project Study Area within the Injection Well Facilities site. (Applies to non-HMP species at the Injection Well Facilities site.) The project proponents shall retain a qualified biologist to conduct protocol-level surveys for special-status plant species within the Injection Well Facilities site not yet surveyed. Protocol-level surveys shall be conducted by a qualified biologist at the appropriate time of year for species with the potential to occur within the site. A report describing the results of the surveys shall be provided to the project proponents prior to any ground disturbing activities. The report shall include, but is not limited to: 1) a description of the species observed, if any; 2) map of the location, if observed; and 3) recommended avoidance and minimization measures, if applicable. The avoidance and minimization measures shall include, but are not limited to, the following:

- Impacts to species individuals shall be avoided through project design and modification, to the extent feasible while taking into consideration other site and engineering constraints.
- If impacts to State listed plant species cannot be avoided, the project proponents shall comply with the CESA and consult with the CDFW to determine whether authorization for the incidental take of the species is required prior to commencing construction. If it is determined that authorization for incidental take is required from the CDFW, the project proponents shall comply with the CESA to obtain an incidental take permit prior to commencing construction on the site upon which state listed plant species could be taken. Permit requirements typically involve preparation and implementation of a mitigation plan and mitigating impacted habitat at a 3:1 ratio through preservation and/or restoration. At a minimum, the impacted plant species shall be replaced at a 1:1 ratio through preservation and/or restoration, as described below. The project proponents shall retain a qualified biologist to prepare a mitigation plan, which shall include, but is not limited to identifying: avoidance and minimization measures; mitigation strategy, including a take assessment, avoidance and minimization measures, compensatory mitigation lands, and success criteria; and funding assurances. The project proponents shall be required to implement the approved plan and any additional permit requirements.
- If impacts to non-State listed, special-status plant species cannot be avoided, the species shall be replaced at a 1:1 ratio for acreage and/or individuals impacted through preservation, restoration, or combination of both. A Rare Plant Restoration Plan, approved by the project proponents prior to commencing of construction on the site upon which the rare plant would be impacted, shall be prepared and implemented by a qualified biologist. The plan shall include, but is not limited to, the following:
    - A detailed description of on-site and/or off-site mitigation areas, salvage of seed and/or soil bank, plant salvage, seeding and planting specifications, including, if appropriate, increased planting ratio to ensure the applicable success ratio. Specifically, seed shall be collected from the on-site individuals that will be impacted and grown in a local greenhouse, and then transplanted within the mitigation area. Plants shall be

transplanted while they are young seedlings in order to develop a good root system. Alternatively, the mitigation area may be broadcast seeded in fall; however, if this method is used, some seed shall be retained in the event that the seeding fails to produce viable plants and contingency measures need to be employed.

- o A description of a 3-year monitoring program, including specific methods of vegetation monitoring, data collection and analysis, restoration goals and objectives, success criteria, adaptive management if the criteria are not met, reporting protocols, and a funding mechanism.

The mitigation area shall be preserved in perpetuity through a conservation easement or other legally enforceable land preservation agreement. Exclusionary fencing shall be installed around the mitigation area to prevent disturbance until success criteria have been met.

Mitigation Measure BT-1g: Conduct Pre-Construction Surveys for Special-Status Bats. (Applies to Salinas Pump Station, Salinas Treatment Facility, Blanco Drain Diversion, Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station, and Injection Well Facilities) To avoid and reduce impacts to special-status bat species, the project proponents shall retain a qualified bat specialist or wildlife biologist to conduct site surveys during the reproductive season (May 1 through September 15) to characterize bat utilization of the component site and potential species present (techniques utilized to be determined by the biologist) prior to tree or building removal. Based on the results of these initial surveys, one or more of the following shall occur:

- If it is determined that bats are not present at the component site, no additional mitigation is required.
- If it is determined that bats are utilizing the component site and may be impacted by the Project, pre-construction surveys shall be conducted no more than 30 days prior to any tree or building removal (or any other suitable roosting habitat) within 100 feet of construction limits. If, according to the bat specialist, no bats or bat signs are observed in the course of the pre-construction surveys, tree and building removal may proceed. If bats and/or bat signs are observed during the pre-construction surveys, the biologist shall determine if disturbance would jeopardize a maternity roost or another type of roost (i.e., foraging, day, or night).
- If a single bat and/or only adult bats are roosting, removal of trees, buildings, or other suitable habitat may proceed after the bats have been safely excluded from the roost. Exclusion techniques shall be determined by the biologist and would depend on the roost type.
- If an active maternity roost is detected, avoidance is preferred. Work in the vicinity of the roost (buffer to be determined by biologist) shall be postponed until the biologist monitoring the roost determines that the young have fledged and are no longer dependent on the roost. The monitor shall ensure that all bats have left the area of disturbance prior to initiation of pruning and/or removal of trees that would disturb the roost. If avoidance is not possible and a maternity roost must be disrupted, authorization from CDFW shall be required prior to removal of the roost.

Mitigation Measure BT-1h: Implementation of Mitigation Measures BT-1a and BT-1b to Mitigate Impacts to the Monterey Ornate Shrew, Coast Horned Lizard, Coast Range Newt, Two-Striped Garter Snake, and Salinas Harvest Mouse. (Applies to Blanco Drain Diversion, Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station, Injection Well Facilities) If these species are encountered, implementation of **Mitigation Measures BT-1a** and **BT-1b**, which avoid and minimize impacts through implementing construction best management practices and monitoring, would reduce potential impacts to these species to a less-than-significant level.

Mitigation Measure BT-1i: Conduct Pre-Construction Surveys for Monterey Dusky-Footed Woodrat. (Applies to Blanco Drain Diversion, Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station, and Injection Well Facilities) To avoid and reduce impacts to the Monterey dusky-footed woodrat, the project proponents shall retain a qualified biologist to conduct pre-construction surveys in suitable habitat proposed for construction, ground disturbance, or staging within three days prior to construction for woodrat nests within the project area and in a buffer zone 100 feet out

from the limit of disturbance. All woodrat nests shall be flagged for avoidance of direct construction impacts and protection during construction, where feasible. Nests that cannot be avoided shall be manually deconstructed prior to land clearing activities to allow animals to escape harm. If a litter of young is found or suspected, nest material shall be replaced, and the nest left alone for 2-3 weeks before a re-check to verify that young are capable of independent survival before proceeding with nest dismantling.

Mitigation Measure BT-1j: Conduct Pre-Construction Surveys for American Badger. (Applies to Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station) To avoid and reduce impacts to the American badger, the project proponents shall retain a qualified biologist to conduct focused pre-construction surveys for badger dens in all suitable habitat proposed for construction, ground disturbance, or staging no more than two weeks prior to construction. If no potential badger dens are present, no further mitigation is required. If potential dens are observed, the following measures are required to avoid potential significant impacts to the American badger:

- If the qualified biologist determines that potential dens are inactive, the biologist shall excavate these dens by hand with a shovel to prevent badgers from re-using them during construction.
- If the qualified biologist determines that potential dens may be active, the den shall be monitored for a period sufficient (as determined by a qualified biologist) to determine if the den is a maternity den occupied by a female and her young, or if the den is occupied by a solitary badger.
- Maternity dens occupied by a female and her young shall be avoided during construction and a minimum buffer of 200 feet in which no construction activities shall occur shall be maintained around the den. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during construction.
- Solitary male or female badgers shall be passively relocated by blocking the entrances of the dens with soil, sticks, and debris for three to five days to discourage the use of these dens prior to project construction disturbance. The den entrances shall be blocked to an incrementally greater degree over the three to five day period. After the qualified biologist determines that badgers have stopped using active dens within the project boundary, the dens shall be hand-excavated with a shovel to prevent re-use during construction.

Mitigation Measure BT-1k: Conduct Pre-Construction Surveys for Protected Avian Species, including, but not limited to, white-tailed kite and California horned lark. (Applies to All Components, except Alternative Monterey Pipeline) Prior to the start of construction activities at each project component site, a qualified biologist shall conduct pre-construction surveys for suitable nesting habitat within the component Project Study Area and within a suitable buffer area from the component Project Study Area. The qualified biologist shall determine the suitable buffer area based on the avian species with the potential to nest at the site.

In areas where nesting habitat is present within the component project area or within the determined suitable buffer area, construction activities that may directly (e.g., vegetation removal) or indirectly (e.g., noise/ground disturbance) affect protected nesting avian species shall be timed to avoid the breeding and nesting season. Specifically, vegetation and/or tree removal can be scheduled after September 16 and before January 31. Alternatively, a qualified biologist shall be retained by the project proponents to conduct pre-construction surveys for nesting raptors and other protected avian species where nesting habitat was identified and within the suitable buffer area if construction commences between February 1 and September 15. Pre-construction surveys shall be conducted no more than 14 days prior to the start of construction activities during the early part of the breeding season (February through April) and no more than 30 days prior to the initiation of these activities during the late part of the breeding season (May through August). Because some bird species nest early in spring and others nest later in summer, surveys for nesting birds may be required to continue during construction to address new arrivals, and because some species breed multiple times in a season. The necessity and timing of these continued surveys shall be determined by the qualified biologist based on review of the final construction plans.

If active raptor or other protected avian species nests are identified during the pre-construction surveys, the qualified biologist shall notify the project proponents and an appropriate no-disturbance buffer shall be imposed within which no construction activities or disturbance shall take place until the young have fledged and are no longer reliant upon the nest or parental care for survival, as determined by a qualified biologist.

Mitigation Measure BT-1l: Conduct Pre-Construction Surveys for Burrowing Owl. (Applies to Product Water Conveyance: RUWAP Alignment Pipeline and Booster Pump Station) In order to avoid impacts to active burrowing owl nests, a qualified biologist shall conduct pre-construction surveys in suitable habitat within the construction footprint and within a suitable buffer, as determined by a qualified biologist, of the footprint no more than 30 days prior to the start of construction at a component site. If ground disturbing activities are delayed or suspended for more than 30 days after the pre-construction survey, the site shall be resurveyed. The survey shall conform to the DFG 1995 Staff Report protocol. If no burrowing owls are found, no further mitigation is required. If it is determined that burrowing owls occupy the site during the non-breeding season (September 1 through January 31), then a passive relocation effort (e.g., blocking burrows with one-way doors and leaving them in place for a minimum of three days) shall be undertaken to ensure that the owls are not harmed or injured during construction. Once it has been determined that the owls have vacated the site, the burrows shall be collapsed, and ground disturbance can proceed. If burrowing owls are detected within the construction footprint or immediately adjacent lands (i.e. within 250 feet of the footprint) during the breeding season (February 1 to August 31), a construction-free buffer of 250 feet shall be established around all active owl nests. The buffer area shall be enclosed with temporary fencing, and construction equipment and workers shall not enter the enclosed setback areas. Buffers shall remain in place for the duration of the breeding season or until it has been confirmed by a qualified biologist that all chicks have fledged and are independent of their parents. After the breeding season, passive relocation of any remaining owls shall take place as described above.

Mitigation Measure BT-1m: Minimize Effects of Nighttime Construction Lighting. (Applies to Injection Well Facilities and CalAm Distribution System: Alternative Monterey Pipeline) Nighttime construction lighting shall be focused and downward directed to preclude night illumination of the adjacent open space area.

*Because **Mitigation Measure BT-1n** (Mitigate Impacts to Smith's Blue Butterfly) was only applicable to the Product Water Conveyance: Coastal Alignment Option and the proposed CalAm Distribution System: Monterey Pipeline, and not the Alternative Monterey Pipeline; therefore, it is not required for the staff-recommended alternative.*

*Because **Mitigation Measure BT-1o** (Avoid and Minimize Impacts to Monarch Butterfly) was only applicable to the proposed CalAm Distribution System: Monterey Pipeline, and not the Alternative Monterey Pipeline; therefore, it is not required for the staff-recommended alternative.*

Mitigation Measure BT-1p: Avoid and Minimize Impacts to Western Pond Turtle. (Applies to Blanco Drain Diversion) A qualified biologist shall survey suitable habitat no more than 48 hours before the onset of work activities at the component site for the presence of western pond turtle. If pond turtles are found and these individuals are likely to be killed or injured by work activities, the biologist shall be allowed sufficient time to move them from the site before work activities begin. The biologist shall relocate the pond turtles the shortest distance possible to a location that contains suitable habitat and would not be affected by activities associated with the project.

Mitigation Measure BT-1q: Avoid and Minimize Impacts to California Red-Legged Frog. (Applies to Salinas Treatment Facility and Blanco Drain Diversion) The following measures for avoidance and minimization of adverse impacts to California Red-Legged Frog (CRLF) during construction of the Project components are those typically employed for construction activities that may result in short-term impacts to individuals and their habitat. The focus of these measures is on scheduling activities at certain times of year, keeping the disturbance footprint to a minimum, and monitoring.

- The MRWPCA shall annually submit the name(s) and credentials of biologists who would conduct activities specified in the following measures. No project construction activities at the component site would begin until the MRWPCA receives confirmation from the USFWS that the biologist(s) is qualified to conduct the work.
- A USFWS-approved biologist shall survey the work site 48 hours prior to the onset of construction activities. If CRLF, tadpoles, or eggs are found, the approved biologist shall determine the closest appropriate relocation site. The approved biologist shall be allowed sufficient time to move CRLF, tadpoles or eggs from the work site before work activities begin. Only USFWS-approved biologists shall participate in activities associated with the capture, handling, and moving of CRLF.
- Before any construction activities begin on the project component site, a USFWS-approved biologist shall conduct a training session for all construction personnel. At a minimum, the training shall include a description of the CRLF and its habitat, the importance of the CRLF and its habitat, general measures that are being implemented to conserve the CRLF as they relate to the project, and the boundaries within which the project construction activities may be accomplished. Brochures, books and briefings may be used in the training session, provided that a qualified person is on hand to answer any questions.
- A USFWS-approved biologist shall be present at the work site until such time as all removal of CRLF, instruction of workers, and disturbance of habitat have been completed. After this time, the biologist shall designate a person to monitor on-site compliance with all minimization measures and any future staff training. The USFWS-approved biologist shall ensure that this individual receives training outlined in Mitigation Measure BT-1a and in the identification of CRLF. The monitor and the USFWS-approved biologist shall have the authority to stop work if CRLF are in harm's way.
- The number of access routes, number and size of staging areas, and the total area of the activity shall be limited to the minimum necessary to achieve the project goal. Routes and boundaries shall be clearly demarcated, and these areas shall be outside of riparian and wetland areas to the extent practicable.
- Work activities shall be completed between April 1 and November 1, to the extent practicable. Should the project proponent demonstrate a need to conduct activities outside this period, the project proponent may conduct such activities after obtaining USFWS approval (applies to Blanco Drain site only).
- If a work site is to be temporarily dewatered by pumping, intakes shall be completely screened with wire mesh not larger than five millimeters (mm) to prevent CRLF from entering the pump system. Water shall be released or pumped downstream at an appropriate rate to maintain downstream flows during construction. Upon completion of construction activities, any barriers to flow shall be removed in a manner that would allow flow to resume with the least disturbance to the substrate.
- The Declining Amphibian Populations Task Force's Fieldwork Code of Practice shall be followed to minimize the possible spread of chytrid fungus or other amphibian pathogens and parasites.

Exhibit A (continued)

Summary of Cumulative Impacts and Mitigation Measures – Staff-Recommended Alternative

#	Topical Section/ Cumulative Impact Issue		Determination of Significance and Discussion of Contribution of the Project to Cumulative Impacts (if applicable)	Mitigation Measures
4.2	Aesthetics		LS: There would be no significant cumulative construction or operational aesthetic impacts.	
4.3	Air Quality and Greenhouse Gas	Construction Greenhouse Gas Emissions	LS: The Project construction would not make a considerable contribution to significant cumulative impacts due to greenhouse gas emissions and the related global climate change impacts.	
		Overall Greenhouse Gas Emissions	LS: The Project would not make a considerable contribution to significant cumulative impacts of greenhouse gas emissions and the related global climate change impacts	
		Air Quality: Overall PM10	**LSM:** The Project would potentially make a considerable contribution to significant cumulative of regional emissions of PM_{10}; however, with implementation of Mitigation Measure AQ-1, the impact would be reduced to less than significant and the Project would not make a considerable contribution to a significant cumulative impact.	AQ-1 (see table above)
4.4	Biological Resources: Fisheries		LS: There would be no significant construction or operational cumulative impacts to biological resources: fisheries.	
4.5	Biological Resources: Terrestrial		LS: The Project would not make a considerable contribution to significant cumulative impacts to biological resources: terrestrial.	
4.6	Cultural and Paleontological Resources		LS: There would be no significant construction or operational cumulative impacts to cultural and paleontological resources.	
4.7	Energy and Mineral Resources	Energy	LS: The Project would not make a cumulatively considerable contribution to a significant cumulative energy impact.	
		Minerals	LS: There would be no significant construction or operational cumulative impacts to mineral resources.	
4.8	Geology, Soils, and Seismicity		LS: There would be no significant construction or operational cumulative geology, seismicity or soils impacts.	
4.9	Hazards and Hazardous Materials		LS: There would be no significant construction or operational cumulative impacts related to hazards or hazardous materials.	
4.10	Hydrology/Water Quality: Groundwater		LS: The Project would not contribute to significant cumulative impacts to groundwater levels, recharge, storage or quality in the Salinas Valley Groundwater Basin. There would be no significant construction or operational impact to groundwater levels, recharge or storage in the Seaside Groundwater Basin. The Project would not make a considerable contribution to cumulative impacts to groundwater quality in the Seaside Basin.	
4.11	Hydrology/Water Quality: Surface Water	Inland Surface Waters	LS: There would be no significant construction or operational cumulative impacts to hydrology and water quality of inland surface waters.	
		Marine Surface Waters	**LSM:** The Project would potentially make a considerable contribution to significant cumulative impacts to marine water quality due to the potential exceedance of the California Ocean Plan water quality objectives for several constituents; however, with implementation of Mitigation Measure HS-C, the impact would be reduced to less than significant and the Project would not make a considerable contribution to a significant cumulative impact.	HS-C (see full text following this table)
4.12	Land Use, Agriculture, and Forest Resources		LS: There would be no significant construction or operational cumulative land use impacts, and the Project would not make a considerable contribution to significant cumulative impacts related to conversion of agricultural lands within unincorporated Monterey County.	
4.13	Marine Biological Resources		LSM: The Project would potentially result in a considerable contribution to significant cumulative impacts on	MR-C

Exhibit A (continued)

Summary of Cumulative Impacts and Mitigation Measures – Staff-Recommended Alternative

#	Topical Section/ Cumulative Impact Issue		Determination of Significance and Discussion of Contribution of the Project to Cumulative Impacts (if applicable)	Mitigation Measures
			marine biological resources due to the potential exceedance of the Ocean Plan water quality objectives for several constituents; however, with implementation of Mitigation Measure MR-C, the impact would be reduced to less than significant and the Project would not make a considerable contribution to a significant cumulative impact.	(Implement HS-C, see full text following this table)
4.14	Noise and Vibration		LS: There would be no significant construction or operational cumulative noise and vibration impacts.	
4.15	Population and Housing		LS: The Project would not make a considerable contribution to significant cumulative impacts related to population and housing.	
4.16	Public Services, Recreation, and Utilities		LS: The Project would not contribute to cumulative impacts related to schools, parks, and recreational facilities. The Project would not make a considerable contribution to significant cumulative impacts to other public services and utilities (fire and police protection, solid waste).	
4.17	Traffic and Transportation		LS: There would be no significant cumulative construction-related traffic and transportation impacts. The Project would not make a considerable contribution to significant cumulative traffic and transportation impacts due to cumulative development.	
4.18	Water Supply and Wastewater Systems	Water Supply	LS: The Project would not make a considerable contribution to significant cumulative impacts to water supply.	
		Wastewater	LS: There would be no significant cumulative impacts on wastewater treatment capacity or ocean outfall disposal capacity.	

Mitigation Measure HS-C/MR-C: Implement Measures to Avoid Exceedances over Water Quality Objectives at the Edge of the Zone of Initial Dilution

As part of the amendment process to modify the existing MRWPCA NPDES Permit (Order No. R3-2014-0013, NPDES Permit No. CA0048551) per 40 Code of Regulations Part 122.62, it would be necessary to conduct an extensive assessment in accordance with requirements to be specified by the RWQCB. It is expected that the assessment would include, at a minimum, an evaluation of the minimum probable initial dilution at the point of discharge based on likely discharge scenarios and any concomitant impacts on water quality and beneficial uses per the Ocean Plan. Prior to operation of the MPSWP desalination plant, the discharger(s) will be required to test the MPSWP source water in accordance with protocols approved by the RWQCB. If the water quality assessment indicates that the water at the edge of the ZID will exceed the Ocean Plan water quality objectives, the MRWPCA will not accept the desalination brine discharge at its outfall, and the following design features and/or operational measures shall be employed, individually or in combination, to reduce the concentration of constituents to below the Ocean Plan water quality objectives at the edge of the ZID:

a. **Additional pre-treatment of MPWSP source water at the Desalination Plant:** Feasible methods to remove PCBs and other organic compounds from the MPWSP source water at the desalination plant include additional filtration or use of granular activated carbon (GAC. GAC acts as a very strong sorbent and can effectively remove PCBs and other organic compounds from the desalination plant source water.

b. **Treatment of discharge at the Desalination Plant:** Feasible methods to remove residual compounds from the discharge to comply with water quality objectives at the edge of the ZID are use of GAC (similar to that under the additional pre-treatment of MPWSP source water) and advanced oxidation with ultraviolet light with concurrent addition of hydrogen peroxide. The method of using advanced oxidation with ultraviolet light with concurrent addition of hydrogen peroxide is used for the destruction of a variety of environmental contaminants such as synthetic organic compounds, volatile organic compounds, pesticides, pharmaceuticals and personal care products, and disinfection byproducts. This process is energy intensive, but requires a relatively small construction footprint.

c. **Short-term storage and release of brine at the Desalination Plant:** When sufficient quantities of treated wastewater from the Regional Treatment Plant to prevent an exceedance of Ocean Plan objectives at the edge of the ZID are not available, brine from the desalination plant would be temporarily stored at the MPWSP site in the brine storage basin (see MPWSP DEIR Chapter 3, Project Description) and discharged (pumped) in pulse flows (up to the capacity of the existing outfall), such that the flow rate allows the discharge to achieve a dilution level that meets Ocean Plan water quality objectives at the edge of the ZID.

d. **Biologically Active Filtration at the Regional Treatment Plant**: As part of the AWT Facilities at the Regional Treatment Plant, the GWR Project includes the potential for use of upflow biologically active filtration following ozone treatment to reduce the concentration of ammonia and residual organic matter present in the ozone effluent and to reduce the solids loading on the membrane filtration process. The biologically active filtration system would consist of gravity-feed filter basins with approximately 12 feet of granular media, and a media support system. Ancillary systems would include an alkalinity addition system for pH control, backwash waste water basin (also used for membrane filtration backwash waste water), backwash pumps, an air compressor and supply system for air scour, an air compressor and supply system for process air, and a wash water basin to facilitate filter backwashing (the wash water basin may be combined with the membrane filtration flow equalization basin). This biologically active filtration system may be needed to meet Ocean Plan water quality objectives at the edge of the ZID (if and/or when discharges from the Project are combined with discharges from the MPWSP with 6.4 mgd desalination plant). This biologically active filtration system may be needed to meet Ocean Plan water quality objectives at the edge of the ZID (if and/or when discharges from the Project are combined with discharges from the MPWSP with 6.4 mgd desalination plant). This optional component of the Project is described in the Draft EIR in **Chapter 2, Project Description** (see **Section 2.8.1.3**), would become a required process if the MPWSP with 6.4 mgd desalination plant is in operation and the other components of the mitigation do not achieve Ocean Plan compliance. The impacts of implementation of this portion of the mitigation measure are discussed in Sections 4.2 through 4.18 as a component of the proposed AWT Facility (within the “Treatment Facilities at the Regional Treatment Plant” component of the Project).

EXHIBIT B

FINAL DRAFT

MITIGATION MONITORING AND REPORTING PROGRAM

for the Pure Water Monterey Groundwater Replenishment Project:

Staff-Recommended Alternative (October 1, 2015)

INTRODUCTION

Section 21081.6 of the California Public Resources Code and Section 15091(d) and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines require public agencies "to adopt a reporting or monitoring program for changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment." This Mitigation Monitoring and Reporting Program (MMRP) has been prepared for the Pure Water Monterey Groundwater Replenishment (GWR) Project, as modified by the Alternative Monterey Pipeline, and reflecting selection of the Regional Urban Water Augmentation Project (RUWAP) alignment for the Product Water Conveyance pipeline and booster pump station. This MMRP is based on the mitigation measures included in the Final Environmental Impact Report (EIR).

This MMRP is applicable to the Staff-Recommended Alternative of the GWR Project. The Staff-Recommended Alternative includes the RUWAP Alignment Option for the Product Water Conveyance pipeline and booster pump station and the Alternative Monterey Pipeline for the CalAm Distribution System Improvements. Therefore, this MMRP includes mitigation measures, monitoring and reporting requirements identified in the Final EIR for these two project components, and it does not include mitigation measures identified for the originally proposed Monterey or Transfer Pipelines of the CalAm Distribution System Improvements, nor the Coastal Alignment Option for the Product Water Conveyance pipeline and booster pump station, since those components are not recommended for approval. Mitigation measures, monitoring and reporting requirements for all other GWR Project components, as modified by the Alternative Monterey Pipeline, are included herein.

For a complete list of acronyms used in this document, please refer to the acronym list in the Draft EIR on pages xii through xvi.