

Attachment A:

Applicant-Proposed Measures versus DEIR Mitigation Measures Comparison Table

**Suncrest Dynamic Reactive Power Support Project**

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**Comparison of PEA Applicant Proposed Measures vs.  
Draft EIR Mitigation Measures**

COMPARISON OF PE A APPLICANT-PROPOSED MEASURES VS. DRAFT EIR MITIGATION MEASURES

Applicant Proposed Measures		Draft EIR Mitigation Measures	NEET West Comments
GENERAL		GENERAL	
APM GEN-1	<b>Worker Environmental Awareness Program.</b> Prior to construction, all NEET West, contractor, and subcontractor Project personnel will receive training regarding the appropriate work practices necessary to effectively implement the project APMs and to comply with the applicable environmental laws and regulations including appropriate resource avoidance and impact minimization procedures, the importance of resources and the purpose and necessity of protecting them, methods for protecting sensitive resources, and unanticipated discovery procedures should resources be uncovered during construction.	<b>**DEIR doesn't include a similar mitigation measure for general training. Instead, biological training and cultural resources training was incorporated as mitigation measures in the Biological Resources and Cultural Resources sections, respectively.</b>	Changes to Mitigation Measure BIO-10 and MM CUL-1 are suggested in the attached comment matrix.
AESTHETICS		AESTHETICS	
APM AES-1	<b>Visual Contrast Minimization.</b> The color of the SVC perimeter fence will be chosen to blend with the existing site features (i.e., dull grey, light brown, or dull green) in order to minimize visual contrast with the landscape setting. No paint or permanent discoloring agents will be applied to rocks or vegetation to indicate survey or construction activity limits.	AES-1 <b>** APMs were retained in concept but significantly edited; edits are not shown as strikethrough vs. new text.</b> <b>Use Design and Architectural Features on Project Structures to Complement the Surrounding Visual Landscape.</b> NEET West or their contractor(s) shall implement the following measures to the extent feasible: <ul style="list-style-type: none"> <li>Material and paint colors should be selected that are compatible with the existing colors of the surrounding area (i.e., dull grey, light brown, or dull green) in order to minimize visual contrast.</li> <li>Natural materials should be selected that blend with the natural surroundings and avoid the use of large expanses of reflective glazing, aluminum panels, and other materials not normally found in the environment.</li> <li>Dulled metal finish transmission structures and non-specular conductors (within the SVC and for the overhead span to interconnect into Suncrest Substation) shall be used for the Proposed Project.</li> <li>Non-specular conductors shall be treated to reduce reflectivity and have a smooth matte gray finish that blends unobtrusively with the environment.</li> </ul>	Acknowledge NEET West's two APMs (AES-1 and AES-2) are very similar to Mitigation Measure AES-1 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of MM AES-1.
APM AES-3	<b>Material Selection.</b> Dulled metal finish transmission structures and non-specular conductors (within the SVC and for the overhead span to interconnect into SDG&E's Suncrest Substation) will be used for the Proposed Project. Non-specular conductors have been treated to reduce reflectivity. They must have a smooth matte gray finish that blends unobtrusively with the environment.		
APM AES-2	<b>Light and Glare Reduction.</b> Construction lighting and permanent exterior lighting of the SVC will be the lowest illumination allowed for human safety and security, selectively placed, and shielded to minimize nighttime glare.	AES-2 <b>Light and Glare Reduction.</b> Temporary construction lighting and permanent exterior SVC lighting shall be the lowest illumination allowed for human safety and security, selectively placed, and shielded and downward facing to minimize nighttime glare.	Acknowledge NEET West's APM AES-3 is very similar to Mitigation Measure AES-2 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of MM AES-1.
AIR QUALITY AND GREENHOUSE GAS EMISSIONS		AIR QUALITY	
APM AIR-1	<b>Fugitive Dust Control.</b> During construction, water or non-toxic soil stabilizers will be applied in sufficient quantities on access roads, staging areas, work areas, and on stockpiles to control fugitive dust.	(APM AIR-1) <b>Fugitive Dust Control.</b> <b>**APM was retained verbatim</b>	APM was retained in DEIR. No changes requested.
APM AIR-2	<b>Speed Limits.</b> During construction, vehicle speeds will be limited to 15 mph on unpaved roads or work areas and vehicles should be turned around in established or designated areas only.	(APM AIR-2) <b>Speed Limits.</b> <b>**APM was retained verbatim</b>	APM was retained in DEIR. No changes requested.
APM AIR-3	<b>Vehicle Use and Idling Time.</b> To the extent feasible construction vehicle use and idling time will be minimized. The ability to limit construction vehicle	(APM AIR-3) <b>Vehicle Use and Idling Time.</b> <b>**APM was retained verbatim</b>	APM was retained in DEIR. No changes requested.

Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
<p>iding time is dependent upon the sequence of construction activities and when and where vehicles are needed or staged. Certain vehicles, such as large diesel powered vehicles, have extended warm-up times following start-up that limit their availability for use following startup. Where such diesel powered vehicles are required for repetitive construction tasks, these vehicles may require more idling time. The Proposed Project will apply a "common sense" approach to vehicle use; if a vehicle is not required for use immediately or continuously for construction activities, its engine will be shut off. Construction foremen will include briefings to crews on vehicle use as part of pre-construction conferences. Those briefings will include discussion of a "common sense" approach to vehicle use.</p>	<p><b>Construction Equipment Emissions.</b> Low-emission construction equipment will be utilized during construction of the Proposed Project. Construction equipment will be maintained per manufacturer specifications. All off-road construction diesel engines not registered under the CARB Statewide Portable Equipment Registration Program shall meet at a minimum the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in CCR Title 13, Section 2423(b)(1).</p>	<p>APM AIR-4</p> <p><b>Construction Equipment Emissions.</b> Low-emission construction equipment will be utilized during construction of the Proposed Project. Construction equipment will be maintained per manufacturer specifications. All off-road construction diesel engines not registered under the CARB Statewide Portable Equipment Registration Program shall meet at a minimum the Tier 2 California Emission Standards for Off-Road Compression-Ignition Engines as specified in CCR Title 13, Section 2423(b)(1).</p> <p>APM was retained in DEIR. No changes requested.</p>
<p><b>Loss of SF6.</b> In operation of the SVC, NEET West will maintain the 230 kv circuit breaker so that the loss of SF6 is less than 0.5% per year. To assess the records of such inspections. NEET West will also participate in EPA's voluntary SF6 Emission Reduction Partnership for Electric Power Systems.</p>	<p><b>Loss of Sulfur Hexafluoride (SF6).</b> In operation of the SVC, NEET West will maintain the 230-kv circuit breaker so that the loss of SF6 is less than 0.5% per year. To assess the records of such inspections. NEET West will also participate in the EPA's U.S. Environmental Protection Agency's voluntary SF6 Emission Reduction Partnership for Electric Power Systems.</p>	<p>APM AIR-5</p> <p>APM was retained in DEIR. No changes requested.</p>
<p>A qualified biologist or environmental inspector who is familiar with the biological resources and issues at the Proposed Project will conduct monitoring during all construction-related ground-disturbing activities that may impact sensitive biological resources, including but not necessarily limited to: initial clearing and vegetation removal; perimeter fence installation and excavation; and movement of construction equipment and other activities outside of fenced/paved areas within wildlife habitat. The biological monitor/environmental inspector will flag or otherwise clearly mark environmentally sensitive areas with appropriate buffers, within which construction is not allowed. The monitor/inspector will have the authority to</p>	<p><b>Additional DEIR Mitigation:</b>  <b>Off-Road Equipment Control.</b> NEET West or their contractor(s) shall implement the following measure:  <ul style="list-style-type: none"> <li>All off-road equipment engines that are 50 horsepower or greater shall meet or exceed U.S. Environmental Protection Agency/California Air Resources Board Tier 3 emissions standards.</li> <li>Exceptions to the Tier 3 requirement shall be allowed for specialty equipment that will be used for no more than 5 days; provided that a due diligence search, which includes at least three (3) appropriate equipment rental firms could not procure the necessary equipment type with a Tier 3 compliant or better engine.</li> </ul> </p> <p><b>BIOLOGICAL RESOURCES</b></p>	<p>AQ-1</p> <p>Additional air quality impact mitigation is unnecessary and unwarranted. Remove Mitigation Measure AQ-1 from DEIR. Refer to comment letter and associated comment matrix.</p>
<p>A qualified biologist or environmental inspector who is familiar with the biological resources and issues at the Proposed Project will conduct monitoring during all construction-related ground-disturbing activities that may impact sensitive biological resources, including but not necessarily limited to: initial clearing and vegetation removal; perimeter fence installation and excavation; and movement of construction equipment and other activities outside of fenced/paved areas within wildlife habitat. The biological monitor/environmental inspector will flag or otherwise clearly mark environmentally sensitive areas with appropriate buffers, within which construction is not allowed. The monitor/inspector will have the authority to</p>	<p><b>Biological Monitor.</b> NEET West or their contractor(s) shall employ a qualified biologist or environmental inspector who is familiar with the biological resources and issues at the Proposed Project <del>will</del> conduct monitoring during all construction-related ground-disturbing activities that may impact sensitive biological resources, including <del>these activities would include</del> but not necessarily be limited to: initial clearing and vegetation removal; perimeter fence installation and excavation; and movement of construction equipment and other activities outside of fenced/paved areas within wildlife habitat. The biological monitor/environmental inspector shall flag or otherwise</p>	<p>BIO-11</p> <p>Acknowledge NEET West's APM BIO-1 as the language is very similar to Mitigation Measure AES-1 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of MM BIO-11.</p>

	<b>Applicant Proposed Measures</b>	<b>Draft EIR Mitigation Measures</b>	<b>NEET West Comments</b>
APM BIO-2	<p>stop work activities upon the discovery of sensitive biological resources, and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources.</p>	<p>clearly mark environmentally sensitive areas with appropriate buffers, within which construction is not allowed. The monitor/inspector <del>will</del> shall have the authority to stop work activities upon the discovery of sensitive biological resources, and allow construction to proceed after the identification and implementation of steps required to avoid or minimize impacts to sensitive resources. Such steps shall be pre-approved by CDFW and/or USFWS, as applicable given the species' status.</p>	
APM BIO-2	<p><b>Vehicle Use of Existing Roads.</b> Except when not feasible due to physical or safety constraints, all Proposed Project vehicle movement will be restricted to existing roads as a part of the Proposed Project. When it is not feasible to keep vehicles on existing access roads or avoid construction of access driveways during the nesting, breeding, or migration season, NEET West will perform a site survey in the area where the work is to occur. This survey will be performed to determine presence or absence of special-status nesting birds or other special-status species in the work area.</p> <p>Parking or driving on unpaved areas underneath oak trees will not be allowed in order to protect root structures. In addition, a 15-mile-per-hour speed limit will be observed on dirt access roads to reduce dust and allow reptiles and small mammals to disperse.</p>	<p><b>Vehicle Use of Existing Roads.</b> NEET West or their contractor(s) shall restrict all Proposed Project vehicle movement to existing roads as a part of the Proposed Project, except when not feasible due to physical or safety constraints. When it is not feasible to keep vehicles on existing access roads or avoid construction of access driveways during the nesting, breeding, or migration season, NEET West will perform a site survey in the area where the work is to occur. This survey shall <del>will</del> be performed to determine presence or absence of special-status nesting birds or other special-status species in the work area. Parking or driving on unpaved areas underneath oak trees shall not be allowed in order to protect root structures. In addition, a 15-mile-per-hour speed limit shall be observed on roads in the Proposed Project area to reduce dust and allow reptiles and small mammals to disperse.</p>	<p>Acknowledge NEET West's APM BIO-2 as the language is very similar to Mitigation Measure BIO-12 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of MM BIO-12.</p>
APM BIO-3	<p><b>Debris and Litter Removal.</b> Littering will not be allowed in the Proposed Project area. Proposed Project personnel will deposit all debris and litter into covered garbage containers which will be disposed of when full. Garbage containers will not be allowed to overflow and lids will be secured to prevent wildlife from removing garbage from containers. No food or waste will be left on the ground in the Proposed Project area, and no biodegradable or non-biodegradable debris will remain in the right-of-way following completion of construction.</p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM BIO-3 which should have been considered as part of the description of the Proposed Project.</p>
APM BIO-4	<p><b>Delineating Sensitive Plant Populations.</b> The Proposed Project does not directly impact any sensitive plant populations, although felt-leaved monardella has been observed immediately adjacent to the Proposed Project. To ensure proper protection of these plants on or near the Proposed Project alignment, a qualified botanist will flag plant populations to be protected and avoided prior to Proposed Project implementation. The flagging will remain in place until work has ceased and the potential for impacts to the populations has abated. Flagging and demarcation will be updated as necessary. The botanist will also map populations using GPS/GNSS to update Proposed Project designs for avoidance in the field. If any sensitive plants are encountered during construction, buffers will be established for avoidance. A minimum buffer of 50 feet will be established from an identified special-status plant species unless consultation with a qualified biologist determines a reduced buffer would suffice to avoid impacts to the species. If plants cannot be avoided, seed will be collected and used during revegetation efforts following construction.</p>	<p><b>** APM was retained in concept but was replaced with more stringent and specific requirements; edits are not shown as <del>strikeout</del> vs. new text.</b></p> <p><b>Perform Focused Surveys for Special-Status Plants</b> NEET West or their contractor(s) shall implement the following measures: Within 1 year before commencement of ground-disturbing activities, a qualified botanist shall perform surveys for special-status plant species with the potential to occur at the site. Floristic surveys will be performed according to the <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities</i> (California Department of Fish and Game 2009 or current version). Floristic surveys will be performed during the appropriate bloom period(s) for each species. If special-status plants are detected within the construction zone or within a 100-foot radius of the construction zone, Mitigation Measure BIO-1c shall be implemented.</p>	<p>NEET West performed focused surveys for special status plants during the appropriate blooming windows. Therefore an additional focused plant survey is unnecessary. Furthermore, NEET West proposed APM BIO-4 to delineate, protect, and avoid special-status plant populations. As a result, impacts will be less than significant and additional special-status plant mitigation such as Mitigation Measure BIO-2 is unnecessary to reduce impacts to a less than significant level. Mitigation Measure BIO-2 should therefore be removed from the DEIR.</p>
BIO-1		<p><b>Design Project to Avoid or Minimize Impacts on Known Occurrences of Special-Status Plants</b> NEET West or their contractor(s) shall implement the following measures:</p> <ul style="list-style-type: none"> <li>To the extent feasible, the Proposed Project shall avoid or minimize impacts on known occurrences of felt-leaved monardella (as shown on Figure 7-6 of this EIR). Avoidance and minimization measures</li> </ul>	<p>See above. APM BIO-4 is similar to this Mitigation Measure BIO-1. Acknowledge NEET West's APM BIO-4 as part of the project design and impacts to special-status plants will be less than significant as stated in the PEA. The project has already been designed to avoid special-status plants. NEET West accepts the language of Mitigation Measure BIO-1.</p>

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	<p>may include adjustments of the project design to avoid special-status plants.</p> <p><b>BIO-3</b></p> <p><b>Avoid or Minimize Impacts on Special-Status Plant Species during Construction</b></p> <p>If special-status plants are detected within the construction zone or within a 100-foot radius of the construction zone while implementing Mitigation Measure BIO-2, NEET West or the contractor(s) shall install exclusion fencing to protect plants that remain in place. Locations of special-status plant populations shall be clearly identified in the field by staking, flagging, or fencing. The plants shall be monitored throughout the duration of construction to determine whether the project has resulted in adverse effects (direct or indirect), as determined by a qualified botanist. If the botanist determines that special-status plants may have been adversely affected, NEET West shall implement measures to compensate for the impact as described in Mitigation Measure BIO-4.</p>	<p>See above. APM BIO-4 is similar to this Mitigation Measure BIO-3. Acknowledge NEET West's APM BIO-4 as part of the project design and description and impacts to special-status plants will be less than significant as stated in the PEA.</p>
	<p><b>BIO-4</b></p> <p><b>Compensate for Impacts to Special-Status Plant Species</b></p> <p>If avoidance of special-status plants is not feasible, NEET West shall implement measures to compensate for impacts on special-status plants. Compensation may be provided by purchasing credits at an approved mitigation bank (provided at a minimum 1:1 ratio [mitigation to impact]), or through transplanting perennial species, collecting and dispersing seed of annual species, and other conservation strategies that shall restore and protect the viability of the local population. Because of the differences in plant growth forms and life histories, conservation measures would be developed on a species-specific basis based on input from CDFW. If compensation measures are implemented, monitoring plant populations shall be conducted annually for 5 years to assess the mitigation's effectiveness. Monitoring shall assess vegetative density, population size, natural recruitment, and plant health and vigor. Monitoring results may trigger management actions such as collection and sowing of additional seed, tillage/disturbance within existing populations to induce establishment, installation of container plants, and control of other competing vegetation to ensure successful plant establishment and survival. The determination of success will be based on whether there has been a substantial reduction (greater than 20 percent) in the size or abundance of the population compared to baseline conditions. The site shall be evaluated at the end of the 5-year monitoring period to determine whether the mitigation has met the success criteria.</p>	<p>The project was designed to avoid impacts to special-status plants. Future impacts to special-status plants is speculative and therefore there is no basis for prescribing compensation for impacts. Remove Mitigation Measure BIO-4 from the DEIR.</p>
<p>APM BIO-5</p> <p><b>Vegetation Trimming and Removal.</b> Vegetation trimming and removal will not be conducted during the bird breeding season (February through August) without a pre-activity survey for vegetation containing active nests, burrows, or dens. The pre-activity survey performed by the on-site biological resource monitor will ensure that the vegetation to be cleared contains no active migratory bird nests, burrows, or active dens prior to clearing. If occupied migratory bird nests are present, tree removal/trimming or brush clearing work would be avoided within a buffer determined by the on-site biologist. If no nests are observed, clearing may proceed. Where burrows or dens are identified in the reconnaissance-level survey, soil in the vegetation trimming or removal area would be sufficiently dry before clearing activities occur to prevent mechanical damage to burrows that may be present.</p>	<p><b>BIO-5</b></p> <p><b>** APM was retained in concept but significantly edited; edits are not shown as strikethrough vs. new text.</b></p> <p><b>Avoid Impacts on Nesting Birds.</b></p> <p>Whenever possible, NEET West or their contractor(s) shall avoid impacts on native nesting birds by not initiating Proposed Project activities that involve clearing vegetation, generating mechanical noise, or ground disturbance during the typical breeding season from February 1 to August 31.</p>	<p>Mitigation Measure BIO-5 is infeasible due to the phasing of construction of the Proposed Project. Remove Mitigation Measure BIO-5 and replace with Mitigation Measure BIO-6 as revised below. Additionally, acknowledge NEET West's APM BIO-5 as part of the Proposed Project.</p>

	<b>Applicant Proposed Measures</b>	<b>Draft EIR Mitigation Measures</b>	<b>NEET West Comments</b>
APM BIO-6	<p>Whenever feasible, trees in environmental sensitive areas, such as areas of riparian or native scrub vegetation, will be scheduled for trimming during non-sensitive (i.e., outside breeding or nesting) times. Where trees cannot be trimmed during non-sensitive times, NEET West will perform a site survey, or more as appropriate, to determine presence or absence of nesting bird species in riparian or native scrub vegetation. Only the minimum amount of vegetation necessary for the construction of structures and facilities will be removed.</p> <p><b>Nesting Bird Buffers and Management Plan.</b> If active nests of non-special-status species birds or common raptors are found, a suitable buffer shall be established around active nests and no construction within the buffer allowed until a qualified biologist has determined that the nest is no longer active (e.g., the nestlings have fledged and are no longer reliant on the nest). Encroachment into the buffer may occur at the discretion of a qualified biologist. If bird nesting is initiated during active construction, the birds will be assumed acclimated to the disturbance and no buffer will be applied; however, direct impacts to active nests will be avoided.</p> <p>Prior to construction, NEET West shall prepare a Nesting Bird Management Plan. The plan shall include at a minimum: the types of birds that may occur in the Proposed Project area; the proposed management strategy for nesting birds; the proposed buffer distances for nesting birds; monitoring, field survey requirements and reporting standards; and nest deterrence strategies.</p>		
APM BIO-7	<p><b>Harming or Feeding Wildlife.</b> No wildlife, including rattlesnakes, will be harmed except to protect life and limb. Firearms and pets will be prohibited in all Proposed Project areas. In addition, feeding of wildlife will not be allowed. This includes keeping trash bins covered and secured at all times until they are removed from the Proposed Project site.</p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM BIO-6 which should have been considered as part of the description of the Proposed Project.</p>
APM BIO-8	<p><b>Inspect Excavations for Trapped Wildlife.</b> All steep-walled trenches or excavations used during construction will be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife is located in a trench or excavation, the on-site biological resource monitor will be contacted immediately to remove them if they cannot escape unimpeded. If the biological resource monitor is not qualified to remove the wildlife, a recognized wildlife rescue agency may be employed to remove the wildlife and transport them safely to other suitable habitats.</p> <p>Steep-walled trenches and excavations will be fenced and/or covered at the end of each workday to the extent practicable, to prevent wildlife from becoming entrapped and for safety purposes. Alternatively, escape ramps will be installed in trenches or excavation to allow wildlife to exit on their own volition.</p>	<p><b>BIO-14</b></p> <p><b>Inspect Excavations for Trapped Wildlife.</b> NEET West or their contractor(s) shall inspect all steep-walled trenches or excavations used during construction will be inspected twice daily (early morning and evening) to protect against wildlife entrapment. If wildlife is located in a trench or excavation, the on-site biological resource monitor will be contacted immediately to remove them if they cannot escape unimpeded. If the biological resource monitor is not qualified to remove the entrapped wildlife, a recognized wildlife rescue agency may be employed to remove the wildlife and transport them safely to other suitable habitats.</p> <p>Steep-walled trenches and excavations will be fenced and/or covered at the end of each workday, to prevent wildlife from becoming entrapped and for safety purposes. Alternatively, escape ramps will be installed in trenches or excavation to allow wildlife to exit on their own volition.</p> <p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge that APM BIO-7 is very similar to Mitigation Measure BIO-14. NEET West accepts the language of Mitigation Measure BIO-14.</p>
APM BIO-9	<p><b>Emergency Repairs.</b> Emergency repairs may be required during the construction and maintenance of the Proposed Project to address situations (e.g., slides, slumps, major subsidence, etc.) that potentially or immediately threaten the integrity of the Proposed Project facilities. During emergency repairs, APMs will be followed to the fullest extent practicable.</p> <p><b>Structures Constructed to Minimize Impacts to Raptors.</b> Structures shall be constructed to conform to "Suggested Practices for Raptor Protection on Power Lines" (Raptor Research Foundation, Inc. 1981) to minimize impacts to raptors. NEET West will construct all aboveground power transmission</p>	<p><b>BIO-7</b></p> <p><b>Structures Constructed to Minimize Impacts to Raptors and other Avian Life.</b> Structures shall be constructed NEET West or their contractor(s) shall construct structures to conform to "Suggested Practices for Raptor</p>	<p>Acknowledge NEET West's APM BIO-8 which should have been considered as part of the description of the Proposed Project.</p> <p>Acknowledge that APM BIO-9 is very similar to Mitigation Measure BIO-7. NEET West accepts the language of Mitigation Measure BIO-7.</p>

	<b>Applicant Proposed Measures</b>	<b>Draft EIR Mitigation Measures</b>	<b>NEET West Comments</b>
APM BIO-10	<p>lines to the Avian Power Line Interaction Committee (APLIC) Guidelines recommendations: Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012.</p>	<p><b>Restoration and Revegetation.</b> NEET West will develop a Restoration and Revegetation Plan to guide restoration activities on the Proposed Project that promotes locally appropriate native plant growth and eliminates non-native and invasive species. The Restoration Plan will identify measures and success criteria specific to each impacted plant community at the Proposed Project. The total area to be planted, and species composition, will be tailored for each impacted plant community based on existing standards and precedents. The Restoration Plan will identify success criteria for each habitat type and develop monitoring measures to ensure that success criteria will be met.</p> <p>Disturbed soils will be revegetated with an appropriate weed-free, native seed mix. All areas designated for temporary impacts will be revegetated with a seed blend that includes native grasses, forbs, and shrub species characteristic of the plant community receiving the temporary impact. Revegetation activities will be undertaken as soon as construction activities have been completed to minimize colonization by non-native weedy species and to ensure compliance with the Proposed Project's SWPPP. Herbicides, if required during the restoration period, will be applied using hand-held applicators for spot-treatment and will not be used within 100 feet of drainages or sensitive plant populations.</p>	<p>Protection on Power Lines" (Raptor Research Foundation, Inc. 1981) to minimize impacts to raptors. NEET West will or their contractor(s) shall construct all aboveground power transmission lines to the Avian Power Line Interaction Committee (APLIC) Guidelines recommendations: <i>Suggested Practices for Avian Protection on Power Lines: The State of the Art in 2006, and Reducing Avian Collisions with Power Lines: State of the Art in 2012</i> (APLIC 2006, 2012).</p>
APM BIO-11	<p><b>Restoration and Revegetation.</b> NEET West will develop a Restoration and Revegetation Plan to guide restoration activities on the Proposed Project that promotes locally appropriate native plant growth and eliminates non-native and invasive species. The Restoration Plan will identify measures and success criteria specific to each impacted plant community at the Proposed Project. The total area to be planted, and species composition, will be tailored for each impacted plant community based on existing standards and precedents. The Restoration Plan will identify success criteria for each habitat type and develop monitoring measures to ensure that success criteria will be met.</p> <p>Disturbed soils will be revegetated with an appropriate weed-free, native seed mix. All areas designated for temporary impacts will be revegetated with a seed blend that includes native grasses, forbs, and shrub species characteristic of the plant community receiving the temporary impact. Revegetation activities will be undertaken as soon as construction activities have been completed to minimize colonization by non-native weedy species and to ensure compliance with the Proposed Project's SWPPP. Herbicides, if required during the restoration period, will be applied using hand-held applicators for spot-treatment and will not be used within 100 feet of drainages or sensitive plant populations.</p>	<p><b>Restoration and Revegetation.</b> NEET West will develop a Restoration and Revegetation Plan to guide restoration activities on the Project site that promotes locally appropriate native plant growth and eliminates non-native and invasive species. The Restoration Plan will identify measures and success criteria specific to each impacted plant community at the Proposed Project. The total area to be planted, and species composition, will be tailored for each impacted plant community based on existing standards and precedents. The Restoration Plan will identify success criteria for each habitat type and develop monitoring measures to ensure that success criteria will be met.</p> <p>Disturbed soils will be revegetated with an appropriate weed-free, native seed mix. All areas designated for temporary impacts will be revegetated with a seed blend that includes native grasses, forbs, and shrub species characteristic of the plant community receiving the temporary impact. Revegetation activities will be undertaken as soon as construction activities have been completed to minimize colonization by non-native weedy species and to ensure compliance with the Proposed Project's Storm Water Pollution Prevention Plan (SWPPP). Herbicides, if required during the restoration period, will be applied using hand-held applicators for spot-treatment and will not be used within 100 feet of drainages or sensitive plant populations.</p>	<p>Acknowledge that APM BIO-16 is very similar to Mitigation Measure BIO-16. NEET West accepts the language of Mitigation Measure BIO-16.</p>
APM BIO-12	<p><b>Night Lighting.</b> NEET West will minimize construction night lighting on adjacent habitats. Exterior lighting within the Proposed Project area adjacent to habitat will be the lowest illumination allowed for human safety and security, shielded, and directed downward to the maximum extent practicable. Vehicle traffic associated with Proposed Project activities will be kept to a minimum volume and speed to prevent nocturnal wildlife species moving about.</p> <p><b>Implementation of Best Management Practices.</b> The plans and specifications for the Proposed Project will require the construction contractor to comply with the Proposed Project's SWPPP and reduce the transport of fugitive dust particles related to construction activities through the use of soil stabilization, watering, or implementation of comparable measures. In addition, construction materials and stockpiled soils will be covered or treated in accordance with the SWPPP to ensure that they do not become a source of fugitive dust or sediment. Fugitive dust management areas, including stockpiled soils, will be inspected weekly by the on-site biologist to ensure that they are adequately managed to prevent the generation of fugitive dust. Erosion controls that comply with county, State, and federal standards will be applied, including the implementation of best management practices. Practices such as installation of silt fences, straw wattles, and check dams will be implemented near disturbed areas to minimize and control erosion and</p>	<p><b>Minimize Night Lighting.</b> NEET West or their contractor(s) will minimize construction night lighting on adjacent habitats. Exterior lighting within the Proposed Project area adjacent to habitat shall be the lowest illumination allowed for human safety and security, selectively placed, shielded, and directed downward to the maximum extent practicable. Vehicle traffic associated with Proposed Project activities shall be kept to a minimum volume and speed to prevent mortality of nocturnal wildlife species moving about.</p>	<p>Acknowledge that APM BIO-11 is very similar to Mitigation Measure BIO-15. NEET West accepts the language of Mitigation Measure BIO-15.</p>
	<p><b>**DEIR does not include a similar mitigation measure</b></p>		<p>Acknowledge NEET West's APM BIO-12 which should have been considered as part of the description of the Proposed Project.</p>



	Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
<p>sedimentation. Erosion management areas will be inspected and maintained regularly in accordance with the Proposed Project's SWPPP.</p> <p>To minimize potential impacts to the environment from accidental fuel spills, the plans and specifications for the Proposed Project will specify that all refueling occur in a designated fueling area that includes a temporary berm to limit the spread of any spill; drip pans will be used during refueling to contain accidental releases, and drip pans will be used under the fuel pump and valve mechanisms of any bulk fueling vehicles parked at the construction site; spills will be immediately addressed per the appropriate spill management plan, and soil cleanup and soil removal initiated if needed.</p>	<p><b>Preconstruction Sweeps for Biological Resources.</b> Prior to initial vegetation clearance, grubbing, and ground-disturbing activities, a qualified biologist will conduct pre-construction sweeps of the Proposed Project for special-status wildlife and plants. During these surveys, the biologist will:</p> <ol style="list-style-type: none"> <li>Ensure that potential habitats become inaccessible to wildlife (e.g., burrows are removed that would otherwise provide temporary refuge);</li> <li>In the event of an unanticipated discovery of a special-status ground-dwelling animal, a biologist holding the appropriate State and/or federal permits will recover and relocate the animal to adjacent suitable habitat within the Proposed Project at least 200 feet from the limits of grading; and,</li> </ol> <p>In the event of the discovery of a previously unknown special-status plant, the area will be marked as an environmentally sensitive area, and avoided to the maximum extent practicable. If avoidance is not possible, NEET West will consult with USFWS and/or CDFW as appropriate given the species' status.</p>	<p><b>Preconstruction Sweeps for Biological Resources.</b> Prior to initial vegetation clearance, grubbing, and ground-disturbing activities, NEET West or their contractor(s) shall ensure that a qualified biologist will <u>shall</u> conduct pre-construction sweeps of the Project site for special-status wildlife and plants. During these surveys, the biologist will <u>shall</u>:</p> <ol style="list-style-type: none"> <li>Ensure that potential habitats become inaccessible to wildlife (e.g., burrows are removed that would otherwise provide temporary refuge);</li> <li>In the event of an unanticipated discovery of a special-status ground-dwelling animal, a biologist holding the appropriate State and/or federal permits shall recover and relocate the animal to adjacent suitable habitat within the Proposed Project at least 200 feet from the limits of grading; and,</li> <li>In the event of the discovery of a previously unknown special-status plant, the area will be marked as an environmentally sensitive area, and avoided to the maximum extent practicable. If avoidance is not possible, NEET West will consult with USFWS and/or CDFW as appropriate given the species' status.</li> </ol>	<p>Acknowledge that APM BIO-13 is very similar to Mitigation Measure BIO-13. NEET West accepts the language of Mitigation Measure BIO-13.</p>
<p>APM BIO-13</p>	<p><b>Preconstruction Sweeps for Biological Resources.</b> Prior to initial vegetation clearance, grubbing, and ground-disturbing activities, a qualified biologist will conduct pre-construction sweeps of the Proposed Project for special-status wildlife and plants. During these surveys, the biologist will:</p> <ol style="list-style-type: none"> <li>Ensure that potential habitats become inaccessible to wildlife (e.g., burrows are removed that would otherwise provide temporary refuge);</li> <li>In the event of an unanticipated discovery of a special-status ground-dwelling animal, a biologist holding the appropriate State and/or federal permits will recover and relocate the animal to adjacent suitable habitat within the Proposed Project at least 200 feet from the limits of grading; and,</li> </ol> <p>In the event of the discovery of a previously unknown special-status plant, the area will be marked as an environmentally sensitive area, and avoided to the maximum extent practicable. If avoidance is not possible, NEET West will consult with USFWS and/or CDFW as appropriate given the species' status.</p>	<p><b>Preconstruction Sweeps for Biological Resources.</b> Prior to initial vegetation clearance, grubbing, and ground-disturbing activities, NEET West or their contractor(s) shall ensure that a qualified biologist will <u>shall</u> conduct pre-construction sweeps of the Project site for special-status wildlife and plants. During these surveys, the biologist will <u>shall</u>:</p> <ol style="list-style-type: none"> <li>Ensure that potential habitats become inaccessible to wildlife (e.g., burrows are removed that would otherwise provide temporary refuge);</li> <li>In the event of an unanticipated discovery of a special-status ground-dwelling animal, a biologist holding the appropriate State and/or federal permits shall recover and relocate the animal to adjacent suitable habitat within the Proposed Project at least 200 feet from the limits of grading; and,</li> <li>In the event of the discovery of a previously unknown special-status plant, the area will be marked as an environmentally sensitive area, and avoided to the maximum extent practicable. If avoidance is not possible, NEET West will consult with USFWS and/or CDFW as appropriate given the species' status.</li> </ol>	<p>Acknowledge that APM BIO-13 is very similar to Mitigation Measure BIO-13. NEET West accepts the language of Mitigation Measure BIO-13.</p>
<p>APM BIO-14</p>	<p><b>Nesting Bird Surveys.</b> If construction is scheduled to commence during the non-nesting season (September 1 to January 31), no preconstruction surveys or additional measures with regard to nesting birds and other raptors are required. To avoid impacts to nesting birds in the Proposed Project area, a qualified wildlife biologist shall conduct preconstruction surveys of all potential nesting habitat within the Proposed Project, and within a 150-foot buffer if access allows, for Proposed Project activities that are initiated during the breeding season (February 1 to August 31). The survey for special-status raptors shall focus on potential nest sites on site and within a 500-foot buffer around the site. Surveys shall be conducted no more than 14 days prior to construction activities. Surveys need not be conducted for the entire Proposed Project at one time; they may be phased so that surveys occur shortly before a portion of the site is disturbed. The surveying biologist must be qualified to determine the status and stage of nesting by migratory birds and all locally breeding raptor species without causing intrusive disturbance. Active nests will be avoided and monitored, and the qualified biologists will have authority to stop-work should it be determined that a nest is being impacted by Proposed Project activity.</p>	<p><b>Nesting Bird Surveys: Implement Preconstruction Surveys for Birds Protected under the Migratory Bird Treaty Act (MBTA).</b> If construction is scheduled to commence during the non-nesting season (September 1 to January 31), no preconstruction surveys for nesting birds are required. To avoid impacts to nesting birds in the Proposed Project area, a qualified wildlife biologist shall conduct preconstruction surveys of all potential nesting habitat within the Proposed Project, and within a 150-foot buffer if access allows, for Proposed Project activities that are initiated during the breeding season (if construction begins between February 1 and August 31), NEET West or their contractor(s) shall ensure that surveys for nesting birds are conducted by a qualified biologist within a 500-foot radius of the construction area. The survey for special-status raptors shall be conducted no more than 14 days prior to construction activities. Surveys need not be conducted for the entire Proposed Project at one time; they may be phased so that surveys occur shortly before a portion of the site is disturbed. The surveying biologist must be qualified to determine the status and stage of nesting by migratory birds and all locally breeding raptor species without causing intrusive disturbance. Active nests will be avoided and monitored, and the qualified biologists will have authority to stop-work should it be determined that a nest is being impacted by Proposed Project activity.</p>	<p>Revise Mitigation Measure BIO-6 to include provisions for the qualified biologist adjusting the no-work buffer depending on site specific circumstances. Refer to the comment matrix for specific revisions proposed. Additionally, the buffer distances should be broken down by passerines and raptors and revised as suggested.</p>

Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
<p>APM BIO-15  <b>Dead or Injured Special-Status Wildlife.</b> If any dead or injured special-status wildlife, or birds protected by the MBTA, are discovered at the Proposed Project during construction, NEET West will stop work in the immediate vicinity. NEET West will notify CPUC, the on-call biologist, and the appropriate resource agency (USFWS and/or CDFW) before construction is allowed to resume.</p> <p>Additional air quality impact mitigation is unnecessary and unwarranted. Remove Mitigation Measure AQ-1 from DEIR. Refer to comment letter and associated matrix for justification.</p>	<p>Wildlife Service (USFWS) will be notified and no-work buffers around nests shall be established that are sufficient to ensure that breeding is not likely to be disrupted or adversely affected by construction. Buffers for non-special-status birds protected under the MBTA shall be 250 feet around the nest. Special status birds are not anticipated to nest within 500 feet of the Proposed Project, but if active special status bird nest are detected, no-work buffer shall be 500 feet around the nest. Buffers will be maintained until the young have fledged or the nests become inactive.</p> <p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>NEET West's APM BIO-15 which should have been considered as part of the description of the Proposed Project.</p>
<p>Additional air quality impact mitigation is unnecessary and unwarranted. Remove Mitigation Measure AQ-1 from DEIR. Refer to comment letter and associated matrix for justification.</p>	<p><b>Additional DEIR Mitigation:</b>  <b>Survey for Potential Hermes Copper Habitat.</b>  Prior to the start of vegetation clearing for the Project, a survey shall be conducted to determine the presence or absence of potentially suitable Hermes copper habitat within the Project footprint. Potentially suitable habitat is defined as mature (woody) spiny redberry shrub(s) within 15 feet of California buckwheat. If Hermes copper habitat is mapped within the project footprint and will be affected by Project activities, then Mitigation Measure BIO-9 shall be implemented.</p>	<p>Mitigation Measure BIO-8 affords no additional protections as a habitat assessment was performed in November 2015, and preconstruction surveys will take place prior to construction. NEET West accepts the language of Mitigation Measure BIO-8.</p>
<p>Additional mitigation and compensation for Hermes copper butterfly is unnecessary and unwarranted. Remove Mitigation Measure BIO-9 from DEIR. Refer to comment letter and associated matrix for justification</p>	<p><b>BIO-9</b>  <b>Mitigate for Impacts to Hermes Copper Butterfly Habitat.</b>  NEET West or their contractor(s) shall implement the following measures:  <ul style="list-style-type: none"> <li>If areas mapped as Hermes Copper butterfly habitat are adversely affected by the Proposed Project, NEET West shall mitigate permanent impacts at a 1:1 ratio for unoccupied habitat and 3:1 ratio for occupied habitat. Habitat should be considered occupied if it is within 150 meters of a Hermes copper sighting (County of San Diego 2010).</li> </ul> </p>	<p>Mitigation Measure BIO-10 is similar to APM GEN-1. NEET West requests a revision to this mitigation measure as stated in comment matrix.</p>
<p>Additional mitigation and compensation for Englemann oak woodland is unnecessary and unwarranted. Remove Mitigation Measure BIO-18</p>	<p><b>BIO-10</b>  <b>Educational Training.</b>  NEET West or their contractor(s) shall ensure that before conducting construction activities all Proposed Project personnel shall participate in an educational training session conducted by a qualified biologist. All on-site personnel shall be informed about relevant special-status species and their habitat, conservation goals, identification, and procedures to follow in the event of a possible sighting. Personnel who miss the first training session or are hired later in the season must participate in a make-up session before conducting Project activities. A record of the personnel that attended the training shall be kept by the qualified biologist.</p> <p><b>BIO-17</b>  <b>Minimize Area of Disturbance of Englemann Oak-Coast Live Oak/Poison Oak/Grass Association Habitat.</b>  NEET West or their contractor(s) shall ensure that the disturbance or removal of vegetation shall not exceed the minimum necessary to complete construction and shall only occur within the defined work area.</p> <p><b>BIO-18</b>  <b>Develop and Implement a Restoration Plan for Englemann Oak-Coast Live Oak/Poison Oak/Grass Association Habitat Disturbed during Construction.</b></p>	<p>This measure is already part of the project's design. Impacts to this community were considered in the PEA and minimized by establishing a retaining wall on the east side of the SVC. NEET West accepts the language of Mitigation Measure BIO-17.</p> <p>Additional mitigation and compensation for Englemann oak woodland is unnecessary and unwarranted. Remove Mitigation Measure BIO-18</p>

Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
<p><b>CULTURAL RESOURCES</b></p> <p><b>Retain a Qualified Principal Investigator.</b> A qualified principal investigator, defined as an archaeologist who meets the Secretary of the Interior's Standards for professional archaeology, will be retained to carry out all applicant proposed measures related to archaeological and historical resources.</p>	<p>NEET West or their contractor(s) shall develop and implement a Habitat Restoration Plan to mitigate any temporary and permanent impact on Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat. For any temporary impact, all disturbed soils and new fill in this habitat shall be revegetated with site-appropriate native species. For any permanent impact, Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association habitat shall be mitigated at a ratio of 1:1.1 (replacement to impact). Engelmann Oak-Coast Live Oak/Poison Oak/Grass Association restoration or compensation may be completed at the Project site, in the vicinity, or at a conservation bank with a service area that covers the Project site. Revegetated or restored areas shall be maintained and monitored to ensure a minimum of 65 percent survival of woody plantings after 5 years.</p> <p><b>CULTURAL RESOURCES</b></p>	<p>from DEIR. Refer to comment letter and associated matrix for justification</p>
<p><b>APM CUL-1</b></p> <p><b>CULTURAL RESOURCES</b></p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM BIO-3 which should have been considered as part of the description of the Proposed Project.</p>
<p><b>APM CUL-2</b></p> <p><b>Archaeological Construction Monitoring.</b> A qualified archaeological monitor will be retained to conduct periodic spot checking of initial ground disturbing activities. The archaeological monitor will work under the supervision of the principal investigator. Spot checking will include but not be limited to: excavations below 24 inches (60 cm) within the former Wilson Laydown Area (previously used as a materials storage and laydown area for the Sunrise Powerlink); and in locations wherein blasting will occur, both prior to and after blasting. The duration and timing of the monitoring will be determined by the CPUC, with recommendations provided by the principal investigator. If the principal investigator determines that periodic spot-checking is no longer warranted, he or she may recommend to the CPUC that monitoring cease entirely. In addition, if the principal investigator determines that an increase in the level of monitoring is warranted, he or she may recommend to the CPUC that full-time monitoring of ground disturbing activities be conducted in archaeologically sensitive areas.</p>	<p><b>CR-1</b></p> <p><b>** APM was retained in concept but significantly edited; edits are not shown as strikethrough vs. new text.</b></p> <p><b>Conduct archaeological sensitivity training and construction monitoring.</b></p> <p>A qualified archaeological monitor will be retained to conduct periodic spot checking of initial Prior to initiation of ground-disturbing activities, NEET West shall arrange for construction crews to receive training about the kinds of archaeological materials that could be present within the project site and the protocols to be followed should any such materials be uncovered during construction. Training shall be conducted by an archaeologist who meets the U. S. Secretary of Interior's professional standards. Training may be required during different phases of construction to educate new construction personnel.</p> <p>The presence of archaeological sites both within the Proposed Project SVC area and along the Bell Bluff Truck Trail indicates that the area is sensitive for archaeological resources. As a result, a qualified archaeological monitor shall be retained to monitor all ground disturbing activities associated with the project. A Native American monitor shall also participate in observing ground-disturbing activities. If any prehistoric or historic-era features, or human remains, are exposed during construction, the archaeological monitor shall have the authority to stop work in the vicinity of the finds and implement the actions identified in Mitigation Measure CR-2.</p>	<p>Mitigation Measure CR-1 is similar to APM GEN-1 and APM CUL-2. NEET West requests a revision to this mitigation measure as stated in comment matrix.</p>
<p><b>APM CUL-3</b></p> <p><b>Inadvertent Discoveries.</b> In the event that unanticipated cultural materials are encountered during any phase of construction, all construction work within 50 feet of the deposit will cease, and the principal investigator will be consulted to assess the find. Construction activities may continue in other areas. Ground-disturbing impacts to any newly-discovered eligible or potentially eligible resources should be avoided to the extent feasible. If avoidance of these sites is not feasible, CPUC's Energy Division will ensure that potentially impacted cultural resources are assessed for significance, as defined by PRC Section 21083.2 or State CEQA Guidelines Section</p>	<p><b>CR-2</b></p> <p><b>** APM was retained in concept but significantly edited; edits are not shown as strikethrough vs. new text.</b></p> <p><b>Immediately halt construction if cultural resources are discovered, evaluate all identified cultural resources for eligibility for inclusion in the California Register of Historical Resources (CRHR), and implement appropriate mitigation measures for eligible resources.</b></p> <p>Not all cultural resources are visible on the ground surface. Construction activities, including possible blasting, at the SVC would require excavation up to 15 feet deep and trenching for the installation for the transmission line</p>	<p>Mitigation Measure CR-2 is similar to APM APM CUL-3. NEET West requests a revision to this mitigation measure as stated in comment matrix.</p>

	NEET West Comments	
<p><b>Applicant Proposed Measures</b></p> <p>15064.5(a), through implementation of Phase II investigations. Should such testing exhaust the data potential of these resources, impacts from the Proposed Project would be reduced to less than significant. Resources found to be not significant will not require additional treatment. Impacts to resources found to be significant will be reduced to less than significant through a Phase III data recovery program. Prior to any ground-disturbing activities, a detailed archaeological treatment plan will be prepared and implemented by a qualified archaeologist for the data recovery program. Data recovery investigations will be conducted in accordance with the archaeological treatment plan to ensure collection of sufficient information to address archaeological and historical research questions, and results will be presented in a technical report (or reports) describing field methods, materials collected, and conclusions. Additional testing and/or data recovery phases may involve additional excavation and/or more detailed recordation of resources or more comprehensive archival research. Any cultural material collected as part of an assessment or data recovery effort should be curated at a qualified facility. Field notes and other pertinent materials should be curated along with the archaeological collection.</p>	<p><b>Draft EIR Mitigation Measures</b></p> <p>along the Bell Bluff Truck Trail would be up to 9 feet deep. These activities have the potential to uncover buried cultural resources. If any cultural resources, such as structural features, unusual amounts of bone or shell, flaked or ground stone artifacts, historic-era artifacts, human remains, or architectural remains are encountered during any project construction activities, work shall be suspended immediately at the location of the find and within a radius of at least 50 feet and the CPUC shall be notified within 24 hours.</p> <p>All cultural resources accidentally uncovered during construction within the project site shall be evaluated for eligibility for inclusion in the CRHR. Resource evaluations shall be conducted by individuals who meet the U.S. Secretary of the Interior's professional standards in archaeology, history, or architectural history, as appropriate. If any of the resources meet the eligibility criteria identified in Public Resources Code section 5024.1 or CEQA section 21083.2(g), mitigation measures shall be developed and implemented in accordance with CEQA Guidelines section 15126.4(b) before construction resumes.</p> <p>For resources eligible for listing in the CRHR that would be rendered ineligible by the effects of project construction, or a Tribal Cultural Resource (TCR), additional mitigation measures shall be implemented. Mitigation measures for archaeological resources may include (but are not limited to) avoidance; incorporation of sites within parks, greenspace, or other open space; capping the site; deeding the site into a permanent conservation easement; or data recovery excavation. Mitigation measures for archaeological resources shall be developed in consultation with responsible agencies and, as appropriate, interested parties, such as Native American tribes. Native American consultation is required if an archaeological site is determined to be a TCR. Implementation of the approved mitigation would be required before resuming any construction activities with potential to affect identified eligible resources at the site.</p> <p>Furthermore, archaeological resources may also contain previously unidentified human remains. Although it would be unlikely for human remains to be disturbed during construction, given the previously disturbed nature and geology of the location, the possibility, though remote, exists that burials could be encountered. If human remains are encountered, Mitigation Measure CR-3 would be implemented during construction to ensure that potential impacts to these resources are less than significant with mitigation.</p>	<p><b>NEET West Comments</b></p>
<p>APM-CUL-4</p> <p><b>Discovery of Human Remains:</b> If human remains are discovered, all work within 15 meters (50 feet) of the discovery shall cease and the San Diego County Coroner shall be notified. State of California Health and Safety Code Section 7050.5 stipulates that no further disturbance will occur until the County Coroner has made a determination of origin and disposition pursuant to PRG Section 5097.98. The San Diego County Coroner and the CPUC will be notified of the find immediately. If the human remains are determined to be prehistoric, the Coroner will notify the NAHC, which will determine and notify a MLD. The MLD will complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.</p>	<p>CR-3</p> <p><b>** APM was retained in concept but significantly edited; edits are not shown as strikethrough vs. new text.</b></p> <p><b>Immediately halt construction if human remains are discovered and implement applicable provisions of the California Health and Safety Code.</b></p> <p>If human remains are accidentally discovered during the Proposed Project's construction activities, the requirements of California Health and Human Safety Code section 7050.5 shall be followed. Potentially damaging excavation shall halt in the project site of the remains, with a minimum radius of 100 feet, and the County Coroner shall be notified. The Coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety Code § 7050.5(b)). If the Coroner determines that the remains are those of</p>	<p>Mitigation Measure CR-3 is similar to APM APM CUL-4. NEET West requests a revision to this mitigation measure as stated in comment matrix.</p>

Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
<p>APM-PR-1</p> <p><b>Inadvertent Fossil Discovery.</b> Should any paleontological resources be found within the Proposed Project footprint prior to or during construction:</p> <ul style="list-style-type: none"> <li>Surface-disturbing work will be halted in the immediate area (within 50 feet) of the find and project paleontologist notified immediately so the find can be evaluated</li> </ul> <p>No operations will resume in the immediate area of the find until written authorization to proceed is issued by the appropriate agency personnel.</p>	<p>a Native American, he or she must contact Native American Heritage Commission (NAHC) by phone within 24 hours of making that determination (Health and Safety Code § 7050(c)). Pursuant to the provisions of Public Resources Code section 5097.98, the NAHC shall identify a Most Likely Descendent (MLD). The MLD designated by the NAHC shall have at least 48 hours to inspect the site and propose treatment and disposition of the remains and any associated grave goods. NEET West shall work with the MLD to ensure that the remains are removed to a protected location and treated with dignity.</p> <p><b>**DEIR evaluated paleo in cultural section (as opposed to geo section) but doesn't include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM BIO-3 which should have been considered as part of the description of the Proposed Project.</p>
<p>APM-GEO-1</p> <p><b>Appropriate Design Measure Implementation.</b> Site excavation likely has the potential to expose variably weathered granitic and metamorphic rock. Earthwork will incorporate the following measures typical to southern California grading practices:</p> <ul style="list-style-type: none"> <li>Remove soils and other surficial deposits that do not possess sufficient strength and stability to support structures. Removals should extend to competent materials with high mechanical strength and resistant to erosion and deformation.</li> <li>Process material obtained from excavation to achieve a maximum particle size and distribution that is suitable for conventional placement in engineered fills. Depending on the quantity of oversize material, consider rock fill placement and/or other forms of disposal as appropriate.</li> <li>Construct keyways, benches, or other structural component transitions/connections into competent material for all fill slopes.</li> <li>Control blasting or utilize alternative excavation techniques near cut slope faces that may be unstable to minimize further slope instability.</li> <li>Install sub-drains in the base of fills placed in swales or ravines.</li> <li>Over-excavate cut areas where structures will be supported by shallow foundations between transitions from cut to fill.</li> </ul>	<p><b>GEOLOGY AND SOILS</b></p> <p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM GEO-1 which should have been considered as part of the description of the Proposed Project.</p>
<p>APM-GEO-2</p> <p><b>Soil Disturbance Minimization.</b> The following measures will be implemented during construction to minimize impacts from geological hazards and disturbance to soils:</p> <ul style="list-style-type: none"> <li>Keep vehicle and construction equipment within the limits of the Proposed Project and in approved construction work areas to reduce disturbance to topsoil.</li> <li>Prior to grading, salvage topsoil to a depth of 6 inches or to actual depth if shallower (as identified in site-specific geotechnical investigation report) to avoid mixing of soil horizons.</li> </ul>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM GEO-2 which should have been considered as part of the description of the Proposed Project.</p>

<i>Applicant Proposed Measures</i>	<i>Draft EIR Mitigation Measures</i>	<i>NEET West Comments</i>
<ul style="list-style-type: none"> <li>• Avoid construction in areas with saturated soils, whenever practical, to reduce impacts to soil structure and allow safe access. Similarly, avoid topsoil salvage in saturated soils to maintain soil structure.</li> <li>• Keep topsoil material onsite in the immediate vicinity of the temporary disturbance or at a nearby approved work area to be used in restoration of temporary disturbed areas. Temporary disturbance areas will be re-contoured following construction to match pre-construction grades. Areas will be allowed to re-vegetate naturally, or will be reseeded with a native seed mix from a local source if necessary. Onsite material storage will be sited and managed in accordance with all required permits and approvals.</li> <li>• Keep vegetation removal and soil disturbance to a minimum and limited to only the areas needed for construction. Removed vegetation will be disposed of off-site to an appropriate licensed facility or can be chipped onsite to be used as mulch during restoration. Onsite material storage will be sited and managed in accordance with all required permits and approvals.</li> </ul>		
<p><b>APM-GEO-3</b></p> <p><b>Stormwater Pollution Prevention Plan Implementation.</b> The Proposed Project will involve more than one acre of ground disturbance. A SWPPP will be prepared in accordance with the California General Permit for Stormwater Discharges Associated with Construction Activities (CGP) (2009-009-DWQ) and implemented for the Proposed Project. Construction will not begin until the SWPPP is complete and coverage under the CGP is obtained. The SWPPP will be prepared in accordance with CGP requirements and other applicable BMPs.</p> <p>The plan will designate BMPs that will be followed during construction to help stabilize disturbed areas and reduce erosion, sedimentation, and pollutant transport. Erosion minimizing efforts will include:</p> <ul style="list-style-type: none"> <li>• Avoiding excessive disturbance of steep slopes;</li> <li>• Using drainage control structures (e.g., straw wattles or silt fencing) to direct surface runoff away from disturbed areas;</li> <li>• Installing sediment barriers between disturbed areas and aquatic habitat (i.e. jurisdictional wetland and water);</li> <li>• Strictly controlling vehicular traffic, specifically ingress and egress locations;</li> <li>• Implementing a dust control program during construction;</li> <li>• Stockpile containment and management requirements; and</li> <li>• Re-vegetating disturbed areas where applicable following construction.</li> </ul> <p>Erosion control measures will be installed, as necessary, prior to clearing during the wet season and before the onset of winter rains or any anticipated storm event. Temporary measures, such as silt fences or straw wattles, intended to minimize erosion from temporarily disturbed areas will remain in place until disturbed areas have stabilized. Such temporary measures will be placed and monitored by a qualified inspector to ensure effectiveness and timely repair as needed.</p> <p>If determined to be necessary the SWPPP will be submitted to the CPUC for review at least 30 days prior to the start of construction. Plan updates will be made and submitted as needed if construction activities change, whereas the existing plan does not adequately address the Proposed Project.</p>	<p><b>**DEIR does not include a similar mitigation measure; compliance with Construction General Permit and preparation of SWPPP is assumed.</b></p>	<p><b>Acknowledge NEET West's APM GEO-3 which should have been considered as part of the description of the Proposed Project.</b></p>

	<b>Applicant Proposed Measures</b>	<b>Draft EIR Mitigation Measures</b>	<b>NEET West Comments</b>
<ul style="list-style-type: none"> <li>•</li> </ul>	<p><b>Applicant Proposed Measures</b></p>	<p><b>Additional DEIR Mitigation:</b>  <b>Implement Recommendations in the Project Geotechnical Investigation Report.</b>  NEET West and/or its contractors shall implement the recommendations contained in the geotechnical investigation report prepared for the Proposed Project by Kleinfelder, dated September 2015 (see Appendix H, <i>Geotechnical Investigation Report</i>). These include recommendations for a geotechnical engineer to be present during construction to evaluate the suitability of excavated soils for use as engineered fill, and to observe and test site preparation and fill placement.</p>	<p>No changes requested.</p>
<p>APM HAZ-1</p>	<p><b>HAZARDS AND HAZARDOUS MATERIALS</b></p> <p><b>Hazardous Materials and Waste Management Plan.</b> A HMWMP will be prepared and implemented for the Proposed Project. Construction will not begin until the plan is complete. The plan will be prepared in accordance with relevant state and federal guidelines and regulations (e.g., Cal/OSHA). The plan will include the following information related to hazardous materials and waste, as applicable:</p> <ul style="list-style-type: none"> <li>• A list of hazardous materials present on-site during construction and operation to be updated as needed along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements;</li> <li>• A Hazardous Materials Communication (i.e., HAZCOM) Plan;</li> <li>• Assignments and responsibilities of Proposed Project Health and Safety roles;</li> <li>• Standards for any secondary containment and countermeasures required for hazardous materials;</li> <li>• Spill response procedures based on product and quantity. The procedures will include materials to be used, location of such materials within the Proposed Project area, and disposal protocols; and</li> <li>• Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This will include termination of work within the area of suspected contamination sampling by an OSHA trained individual, and testing at a certified laboratory.</li> </ul> <p>A copy of the plan will be provided to the CPUC for recordkeeping prior to the start of construction. Plan updates will be made and submitted as needed if construction activities change whereas the existing plan does not adequately address the Proposed Project.</p>	<p><b>HAZARDS AND HAZARDOUS MATERIALS</b></p> <p><b>Hazardous Materials and Waste Management Plan (HMWMP)</b>  A-HMWMP will be prepared and implemented for the Proposed Project. Construction will not begin until the plan is complete. The plan will be prepared in accordance with relevant state and federal guidelines and regulations (e.g., Cal/OSHA). NEET West and/or its contractor(s) shall prepare and implement a HMWMP. The HMWMP may include components or requirements which are part of compliance documents for other applicable federal and state hazardous materials regulations. The plan will include the following information related to hazardous materials and waste, as applicable:</p> <ul style="list-style-type: none"> <li>• A list of hazardous materials present on-site during construction and operation, to be updated as needed along with product Safety Data Sheets and other information regarding storage, application, transportation, and disposal requirements;</li> <li>• A Hazardous Materials Communication (i.e., HAZCOM) Plan;</li> <li>• Assignments and responsibilities of Proposed Project Health and Safety roles;</li> <li>• Standards for any secondary containment and countermeasures that will be required for hazardous materials;</li> <li>• Spill response procedures based on product and quantity. The procedures will include materials to be used, location of such materials within the Proposed Project area, and disposal protocols; and</li> <li>• Protocols for the management, testing, reporting, and disposal of potentially contaminated soils or groundwater observed or discovered during construction. This will include termination of work within the area of suspected contamination sampling by an OSHA trained individual, and testing at a certified laboratory.</li> </ul> <p>A copy of the HMWMP will be provided to the CPUC for recordkeeping prior to the start of construction. HMWMP updates shall be made and submitted as needed if construction activities change whereas the existing HMWMP does not adequately address the Proposed Project.</p>	<p>Acknowledge NEET West's APM HAZ-1 as the language is very similar to Mitigation Measure HAZ-1 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of Mitigation Measure HAZ-1.</p>
<p>APM HAZ-2</p>	<p><b>Environmental and Hazardous Materials Safety and Management Plans.</b> In addition to the HMWMP, all necessary environmental and hazardous materials safety and management plans will be developed for the Proposed Project. This may include but is not limited to the preparation of a Hazardous</p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM HAZ-2 which should have been considered as part of the description of the Proposed Project.</p>

	Draft EIR Mitigation Measures	NEET West Comments
<p><b>Applicant Proposed Measures</b></p> <p>Materials Business Plan, Spill-Response Plan, 90-day temporary storage and disposal facility permit, and a Spill Prevention Control and Countermeasure Plan (i.e., if the Proposed Project will result in storage of over 1,320 gallons of oil at any one location).</p>	<p><b>Follow Control Plan.</b> A Proposed Project-specific weed control plan will be prepared and implemented. The plan will include methods for controlling the introduction and distribution of weeds during construction such as cleaning of tires and surfaces of all trucks and construction equipment prior to commencing work in off-road areas, using rocks/grates at the Proposed Project entry points to physically dislodge seeds, using certified weed-free mulch for stabilizing areas of disturbed soil, utilizing on-site soil to the maximum extent practicable for fill. Following construction annual maintenance activities will track the presence and proliferation of non-native, invasive plants known to potential increase wildland fire hazards (e.g., cheatgrass [<i>Bromus tectorum</i>], Saharan mustard [<i>Brassica tournefortii</i>], and medusa head [<i>Taeniatherum caputmedusae</i>]). The plan will establish performance criteria and metrics for the presence of weed species based on reducing fire hazards and include methods for control of these species to generated acceptability thresholds.</p>	<p><b>NEET West Comments</b></p>
<p>APM HAZ-3</p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM HAZ-3 which should have been considered as part of the description of the Proposed Project.</p>
<p>APM HAZ-4</p>	<p><b>HAZ-5</b></p> <p><b>Follow Requirements and Recommendations Identified in the Fire Protection Plan (FPP)</b></p> <p>NEET West and/or its contractor(s) shall follow all of the requirements and recommendations contained in the FPP prepared for the Proposed Project by Dudek, dated June 2016. These requirements include, but are not limited to, design and implementation of defensible space around the proposed SVC facility according to the parameters described in the FPP; conducting training sessions with local fire station personnel and providing technical support to fire personnel regarding electrical fires and firefighting at energized facilities; appropriate design of driveways and access roads to allow for safe and efficient fire personnel and equipment access; development and implementation of appropriate protocols for de-energizing the proposed facilities; inclusion of a 10,000 gallon water storage tank accessible to firefighters at the SVC site, and arrangement of electrical equipment on the SVC site to maintain adequate setbacks from vegetated areas.</p>	<p>Acknowledge NEET West's APM HAZ-4 as the language is very similar to Mitigation Measure HAZ-5 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of Mitigation Measure HAZ-5.</p>
<p>APM HAZ-3</p>	<p><b>Additional DEIR Mitigation:</b></p> <p><b>Prepare and Implement a Construction Fire Protection Plan (CFPP)</b></p> <p>NEET West and/or its contractor(s) shall prepare and implement the Project's CFPP in accordance with applicable sections of the San Diego County Consolidated Fire Code. The document will address fire prevention measures that will be employed during the construction phase, identifying potential sources of ignition and detailing the measures, equipment, and training that will be provided to all site contractors. The CFPP shall be prepared, reviewed, and approved by the San Diego County Fire Authority (SDCFA) and California Department of Forestry and Fire Protection (CAL</p>	<p>Acknowledge NEET West's APM HAZ-3 which should have been considered as part of the description of the Proposed Project. NEET West accepts the language of Mitigation Measure HAZ-5.</p>



	<b>Applicant Proposed Measures</b>	<b>Draft EIR Mitigation Measures</b>	<b>NEET West Comments</b>
APM HAZ-5	<p><b>Remove hazards from work area.</b> The removal of hazards (i.e., fuels) from the work area will reduce the severity of construction- and maintenance-related ignitions that escape initial containment efforts by minimizing fuel loads. This will reduce the potential impact to communities and natural resources in the event of a project construction- or maintenance-related ignition.</p>	<p>FIRE) a minimum of 45 days prior to commencement of construction activities.</p> <p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM HAZ-5 which should have been considered as part of the description of the Proposed Project.</p>
APM HAZ-6	<p><b>Establish and maintain adequate equipment clearances.</b> Establishing and maintaining adequate clearances from electrical equipment, such as the riser pole structure or SVC transformer components, will reduce the risk of vegetation contact with the 300-foot overhead conductor and provide a defensible space around the SVC site. Maintenance of vegetation will be in accordance with CPUC General Order No. 95, Section 3, Rule 35, Vegetation Management.</p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM HAZ-6 which should have been considered as part of the description of the Proposed Project.</p>
APM HAZ-7	<p><b>Fire Safe Working Conditions and Best Management Practices.</b> The following measures will be implemented during construction and operation to reduce the potential for ignitions and minimize fire related hazards:</p> <ul style="list-style-type: none"> <li>All work vehicles will be required to carry fire suppression equipment. Workers will be trained in the use of equipment for fire suppression (see APM HAZ-3).</li> <li>Smoking will be confined to vehicles or approved smoking areas where fire suppression equipment and appropriate disposal facilities are present. All smoking materials will be disposed of in appropriate disposal bins.</li> <li>All on-road vehicle parking will be restricted to paved or gravelled surfaces unless parking is required during an emergency or required for worker safety.</li> <li>Require spark arrestors on all off-road equipment.</li> <li>Restrict work activities during Red Flag Warnings issued by the National Weather Service to the extent possible. Where it is not possible to stop or restrict work activities due to safety or time sensitive activities, work activities will be limited to those needed to establish safe working conditions. During Red Flag Warnings a crew member will be assigned to fire watch for each separate and distinct active work area.</li> <li>Weather and fire danger will be monitored on a daily basis.</li> <li>Fire suppression equipment such as backpack water pumps or water buffaloes will be kept on-site at a minimum of 50 feet from each separate and distinct active work area.</li> </ul>	<p><b>HAZ-4</b></p> <p><b>Fire Safe Working Conditions and Best Management Practices.</b> NEET West and/or its contractor(s) shall implement the following measures will be implemented during construction and operation to reduce the potential for ignitions and minimize fire-related hazards (these measures may be included in the CFP, as appropriate):</p> <ul style="list-style-type: none"> <li>All work vehicles will be required to carry fire suppression equipment. Workers will be trained in the use of equipment for incipient stage fire suppression.</li> <li>Smoking will be confined to vehicles or approved smoking areas where fire suppression equipment and appropriate disposal facilities are present. All smoking materials will be disposed of in appropriate disposal bins.</li> <li>All on-road vehicle parking will be restricted to paved or gravelled surfaces unless parking is required during an emergency or required for worker safety.</li> <li>Require spark arrestors on all off-road equipment.</li> <li>Restrict work activities during Red Flag Warnings issued by the National Weather Service to the extent possible. Where it is not possible to stop or restrict work activities due to safety or time sensitive activities, work activities will be limited to those needed to complete the current task and establish safe working conditions. During Red Flag Warnings a crew member will be assigned to fire watch for each separate and distinct active work area.</li> <li>Weather and fire danger will be monitored on a daily basis.</li> <li>Fire suppression equipment such as backpack water pumps or water buffaloes will be kept on-site at a minimum of 50 feet from each separate and distinct active work area.</li> </ul>	<p>Acknowledge NEET West's APM HAZ-7 as the language is very similar to Mitigation Measure HAZ-4 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of Mitigation Measure HAZ-4.</p>
APM HAZ-8	<p><b>Blasting Plan.</b> If blasting is deemed necessary for the construction of Proposed Project components, NEET West shall conduct a pre-blast survey and final blasting plan shall be provided to the appropriate regulatory agency and approved prior to any rock removal using explosives. In addition to any other requirements established by the appropriate regulatory agencies, the pre-</p>	<p><b>HAZ-2</b></p> <p><b>Prepare and Implement Blasting Plan</b> If blasting is deemed necessary for the construction of Proposed Project components, NEET West shall conduct a pre-blast survey, and prepare a blasting plan, and obtain appropriate blasting and explosive permits prior to conducting any blasting activities during Project construction. NEET West shall submit a written report of the pre-blast survey and final blasting plan shall be provided to the appropriate regulatory agency and approved prior to any rock removal using explosives to CPUC and the County of San</p>	<p>Acknowledge NEET West's APM HAZ-8 as the language is similar to Mitigation Measure HAZ-2 and should have been considered as part of the description of the Proposed Project. NEET West accepts the language of Mitigation Measure HAZ-2.</p>

	NEET West Comments	
<p><b>Applicant Proposed Measures</b></p> <p>blast survey and blasting plan shall meet the following conditions, as well as those outlined in APM NOI-2.</p> <ul style="list-style-type: none"> <li>The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by NEET West. Notification that blasting will occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.</li> <li>The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</li> <li>The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed SVC, riser pole and underground transmission line structures. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. NEET West, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.</li> <li>The blasting plan shall incorporate provisions to post signage along roads and trails within a minimum of 1000 feet of the identified blast site. Precautions such as fencing or taping will be incorporated that limit access to recreationalists and the general public.</li> </ul>	<p><b>Draft EIR Mitigation Measures</b></p> <p>Diego and receive approval from that agency prior to any rock removal activity. The pre-blast survey and blasting plan shall meet the following conditions, as well as those outlined in APM NOI-2:</p> <ul style="list-style-type: none"> <li>The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be specified by NEET West. Notification that blasting will occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. The pre-blast survey shall be included in the final blasting plan.</li> <li>The final blasting plan shall outline safe and lawful procedures for transport, handling, and storage of explosives. The blasting plan shall identify where on the site explosives will be stored and explain what safety precautions will be taken in transporting and handling explosives to prevent potential accidental explosions or release of hazardous materials into the environment.</li> <li>The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</li> <li>The final blasting plan shall identify fire-safe blasting procedures and measures to prevent possible ignition of wildfires during blasting activities.</li> <li>The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed SVC, riser pole and underground transmission line structures. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. NEET West, or its subcontractor (as appropriate) shall keep a record of each blast for at least 1 year from the date of the last blast.</li> </ul> <p>The blasting plan shall incorporate provisions to post signage along roads and trails within a minimum of 1000 feet of the identified blast site. Precautions such as fencing or taping will be incorporated that limit access to recreationalists and the general public.</p>	<p><b>NEET West Comments</b></p>
<p>APM WQ-1</p>	<p><b>HYDROLOGY AND WATER QUALITY</b></p> <p><b>Limited On-site Vehicle and Equipment Fueling.</b> Construction equipment will use off-site fueling stations to the extent possible. Where off-site fueling is not possible, all on-site fueling will adhere to measures specified in the SWPPP and Hazardous Materials and Waste Management Plan. On-site fueling will occur within approved work areas only. No refueling or fuel storage will occur within 100 feet of environmentally sensitive areas (i.e., jurisdictional waters, and riparian areas; rare plant localities; or existing storm drains) or within 200 feet of water supply wells, unless otherwise approved by the environmental inspector or in the event of an emergency that threatens life or property. If fueling is required within these buffer zones, the</p>	<p><b>HYDROLOGY AND WATER QUALITY</b></p> <p><b>**DEIR does not include a similar mitigation measure</b></p> <p>Acknowledge NEET West's APM WQ-1 which should have been considered as part of the description of the Proposed Project.</p>

	<b>Applicant Proposed Measures</b>	<b>Draft EIR Mitigation Measures</b>	<b>NEET West Comments</b>
	environmental inspector or on-site biologist must be contacted and secondary containment devices must be utilized to ensure no fuel spills occur.		
APM WQ-2	<b>Proper Sanitary/Septic Waste Management.</b> Sanitary facilities will be located at least 100 feet from environmentally sensitive areas (i.e., jurisdictional waters and riparian areas; rare plant localities; or existing storm drains) at locations convenient for pump-out. Facilities will be sited and maintained (including scheduling regular waste collection by a licensed hauler) to ensure there is no overflow.	<b>**DEIR does not include a similar mitigation measure</b>	Acknowledge NEET West's APM WQ-2 which should have been considered as part of the description of the Proposed Project.
APM WQ-3	<b>Source Water Protection and Identification.</b> Source water for the Proposed Project will be obtained from a permitted source. There will be no unauthorized withdrawal or capture of surface waters for use or consumption. Contact will occur with affected landowners (i.e., the owner of each tax parcel crossed by the Proposed Project) prior to construction to identify the location of unknown water supply wells.	<b>**DEIR does not include a similar mitigation measure</b>	Acknowledge NEET West's APM WQ-3 which should have been considered as part of the description of the Proposed Project.
APM WQ-4	<b>Groundwater Management.</b> Groundwater encountered during construction will be handled and discharged in accordance with all State and federal regulations including the following: <ul style="list-style-type: none"> <li>• Recovered groundwater will be contained on site and tested prior to discharge.</li> <li>• If testing determines water is suitable for land application, discharge may be applied to flat, vegetated, upland areas, used for dust control, or used in other suitable construction operations (e.g., concrete mixing).</li> <li>• Land application will be made in a manner that discharge does not result in substantial erosion and will not be made directly to receiving waters or storm drains.</li> <li>• Water unsuitable for land application will be disposed of at an appropriately permitted facility.</li> <li>• Discharge to surface waters or storm drains may occur only if permitted by the agency(ies) with jurisdiction over the resource (e.g., USACE, RWQCB, and/or CDFW, as applicable).</li> </ul>	<b>**DEIR does not include a similar mitigation measure</b>	Acknowledge NEET West's APM WQ-4 which should have been considered as part of the description of the Proposed Project.
APM WQ-5	<b>Identification and Flagging of Sensitive Aquatic Features.</b> Prior to construction, sensitive aquatic features (i.e., jurisdictional wetlands, waters, and riparian areas; and existing storm drains, culverts, or drainage ditches), where disturbance is not already approved pursuant to permits issued by the USACE, CDFW, RWQCB or other authorizing agency, will be identified in the field and clearly marked for avoidance using flagging tape or other high-visibility signage. Construction personnel will be trained on feature avoidance marking and associated restrictions.	<b>**DEIR does not include a similar mitigation measure</b>	Acknowledge NEET West's APM WQ-5 which should have been considered as part of the description of the Proposed Project.
APM WQ-6	<b>Avoidance of Sensitive Aquatic Features.</b> The Proposed Project will be designed to avoid sensitive aquatic features (i.e., jurisdictional wetlands, waters, riparian areas, and stormwater conveyance structures) to the extent feasible. Specific avoidance strategies include: <ul style="list-style-type: none"> <li>• Siting splice vault structures and the riser pole structure within or immediately adjacent to Bell Bluff Truck Trail or in uplands outside of existing drainage features and the storm water conveyance system along Bell Bluff Truck Trail.</li> </ul>	<p><b>HYD/WQ-2</b></p> <p><b>Avoidance and Minimization of Impacts to Existing Culverts and Stormwater Conveyance Features</b></p> <p>The Proposed Project will be designed to avoid sensitive aquatic features (i.e., jurisdictional wetlands, waters, riparian areas, and stormwater conveyance structures) existing stormwater conveyance structures to the extent feasible. Specific avoidance strategies include:</p> <ul style="list-style-type: none"> <li>• Siting splice vault structures and the riser pole structure within or immediately adjacent to Bell Bluff Truck Trail or in uplands outside</li> </ul>	Acknowledge that Mitigation Measure HYD/WQ-2 is similar to APM WQ-2 and should be considered part of the Proposed Project. NEET West accepts the language of Mitigation Measure HYD/WQ-1 as written.

	<p style="text-align: center;"><b>Applicant Proposed Measures</b></p>	<p style="text-align: center;"><b>NEET West Comments</b></p>
<ul style="list-style-type: none"> <li>• Siting of laydown and other temporary staging/materials storage areas within Bell Bluff Truck Trail.</li> <li>• Constructing the SVC, access drives, and riser pole structure within uplands while avoiding other sensitive features (e.g., steep slopes, rare plant localities, sensitive wildlife habitats).</li> <li>• Where feasible based on geotechnical investigation, avoiding culverts within Bell Bluff Truck Trail during construction of the underground transmission line by bracing or stabilizing culvert structures and excavating beneath the culvert structures to maintain culvert function. Where it is infeasible to avoid impacts to existing culverts, work will not occur within 48 hours of a forecasted rain event of 0.5 inches or greater and temporary piping will be onsite to maintain any unexpected water flow.</li> <li>• All regulated activities within jurisdictional wetlands and waters (e.g., waters of the United States and waters of the State) will require regulatory approval/permitting from the appropriate agency including USACE, CDFW, and/or RWQCB prior to any work within jurisdictional features.</li> </ul>	<p style="text-align: center;"><b>Draft EIR Mitigation Measures</b></p> <p>of existing drainage features and the storm water conveyance system along Bell Bluff Truck Trail.</p> <ul style="list-style-type: none"> <li>• <del>Siting of laydown and other temporary staging/materials storage areas within Bell Bluff Truck Trail.</del></li> <li>• <del>Constructing the SVC, access drives, and riser pole structure within uplands while avoiding other sensitive features (e.g., steep slopes, rare plant localities, sensitive wildlife habitats).</del></li> <li>• Where feasible based on geotechnical investigation, avoiding culverts within Bell Bluff Truck Trail during construction of the underground transmission line by bracing or stabilizing culvert structures and excavating beneath the culvert structures to maintain culvert function. Where it is infeasible to avoid impacts to existing culverts, work will not occur within 48 hours of a forecasted rain event of 0.5 inches or greater and temporary piping will be onsite to maintain any unexpected water flow.</li> <li>• <del>All regulated activities within jurisdictional wetlands and waters (e.g., waters of the United States and waters of the State) will require regulatory approval/permitting from the appropriate agency including USACE, CDFW, and/or RWQCB prior to any work within jurisdictional features.</del></li> </ul> <p>Where it is infeasible to avoid impacts to existing culverts or other stormwater conveyance structures, work will not occur within 48 hours of a forecasted rain event of 0.5 inches or greater and temporary piping will be onsite to maintain any unexpected water flow. Prior to removing or impacting any existing culverts during construction, NEET West shall obtain all necessary regulatory approvals/permits from the appropriate agency (e.g., U.S. Army Corps of Engineers, CDFW, or Regional Water Quality Control Board) with jurisdiction over the features.</p> <p>Following construction, NEET West shall reinstall any temporarily removed culverts or other stormwater conveyance structures and restore work areas to preconstruction conditions.</p>	
<p style="text-align: center;"><b>HYD/WQ-1</b></p>	<p><b>DEIR mitigation measures are similar to APM GEO 2 and APM GEO 3 but significantly reworded:</b></p> <p><b>Implement Construction Best Management Practices for Erosion Control</b></p> <p>NEET West and/or its contractor(s) shall implement the following measures during Proposed Project construction, or shall implement alternative measures that are equally or more effective:</p> <ul style="list-style-type: none"> <li>• Implement practices to reduce erosion of exposed soil and stockpiles, including watering for dust control, establishing perimeter silt fences, and/or placing fiber rolls.</li> <li>• Minimize soil disturbance areas.</li> <li>• Implement practices to maintain water quality, including silt fences, stabilized construction entrances, and storm-drain inlet protection.</li> <li>• Where feasible, limit construction to dry periods.</li> <li>• Revegetate disturbed areas.</li> </ul> <p>The performance standard for these erosion control measures is to use the best available technology that is economically achievable. These measures may be included in SWPPP requirements, as appropriate.</p>	<p>Acknowledge that Mitigation Measure HYD/WQ-1 is similar to APM GEO-2 and APM GEO-3 and should be considered part of the Proposed Project. NEET West accepts the language of Mitigation Measure HYD/WQ-1.</p>

	Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
	<p align="center"><b>NOISE</b></p>	<p align="center"><b>NOISE AND VIBRATION</b></p>	
<p>APM NOI-1</p>	<p><b>Construction Work Hours.</b> Noise-generating construction activities will typically occur between 7:00 a.m. and 7:00 p.m. consistent with San Diego County's Noise Ordinance. Additional work days or hours will also be required for time sensitive work activities (e.g., concrete pours, underground transmission cable splicing, trenching, transformer oil filling, etc.) or as dictated by safety concerns. When noise-intensive construction work (which has the potential to exceed noise standards) is required earlier than 7:00 a.m. or later than 7:00 p.m., landowners will be notified at least 2 days prior to the activities beginning. The notice will provide details on the nature of the activity, noise levels anticipated, and duration of the activity.</p>	<p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM NOI-1 which should have been considered as part of the description of the Proposed Project.</p>
<p>APM NOI-2</p>	<p><b>Reduction of Blasting Impacts.</b> NEET West will explore the use of alternative excavation techniques (micropiles, etc.) as an alternative to blasting. However, if blasting activities become necessary for excavation, blasting mats or similar attenuation measures will be used to reduce the impulsive noise associated with such activities. Additionally, NEET West shall conduct a pre-blast survey, prepare a blasting plan, and obtain appropriate blasting and explosive permits. A written report of the pre-blast survey and final blasting plan shall be provided to the appropriate regulatory agency and approved prior to any rock removal using explosives. In addition to any other requirements established by the appropriate regulatory agencies, the pre-blast survey and blasting plan shall meet the following conditions:</p> <ul style="list-style-type: none"> <li>• The pre-blast survey shall be conducted for structures within a minimum radius of 1,000 feet from the identified blast site to be affected by NEET West. Sensitive receptors that could reasonably be affected by blasting shall be surveyed as part of the pre-blast survey. Notification that blasting would occur shall be provided to all owners of the identified structures to be surveyed prior to commencement of blasting. If SDG&amp;E facilities are within the survey radius, NEET West will consult with SDG&amp;E engineers in the pre-blast survey (no other structures fall within 1,000 feet of any part of the Proposed Project). The pre-blast survey shall be included in the final blasting plan.</li> <li>• The final blasting plan shall address air-blast limits, ground vibrations, and maximum peak particle velocity for ground movement, including provisions to monitor and assess compliance with the air-blast, ground vibration, and peak particle velocity requirements. The blasting plan shall meet criteria established in Chapter 3 (Control of Adverse Effects) in the Blasting Guidance Manual of the U.S. Department of Interior Office of Surface Mining Reclamation and Enforcement.</li> <li>• The blasting plan shall outline the anticipated blasting procedures for the removal of rock material at the proposed SVC and underground transmission line structures. The blasting procedures shall incorporate line control to full depth and controlled blasting techniques to create minimum breakage outside the line control and maximum rock fragmentation within the target area. Prior to blasting, all applicable regulatory measures shall be met. NEET West, or its subcontractor (as appropriate), shall keep a record of each blast for at least 1 year from the date of the last blast.</li> </ul>	<p><b>**DEIR does not include a similar mitigation measure in noise but see DEIR MM HAZ-2, above, which includes some of the provisions outlined in this APM</b></p>	<p>Acknowledge NEET West's APM NOI-2 which should have been considered as part of the description of the Proposed Project.</p>

Applicant Proposed Measures	Draft EIR Mitigation Measures	NEET West Comments
	<p><b>NOI-1</b></p> <p><b>Additional DEIR Mitigation:</b>  <b>Construction-Noise Mitigation Plan</b>  NEET West and/or its contractors shall develop and implement a construction-noise mitigation plan in close coordination with adjacent noise-sensitive land uses so that construction activities can be scheduled to minimize noise disturbance. The plan must be approved by the CPUC prior to the initiation of construction activities. The construction-noise mitigation plan shall consider the following available controls to reduce construction-noise levels to as low as practicable.</p> <ul style="list-style-type: none"> <li>• Equip all internal combustion-driven equipment with mufflers that are in good condition and appropriate for the equipment.</li> <li>• Construct temporary sound barriers using plywood or similar material bearing the same sound attenuating effectiveness as plywood between portions of the construction sites and sensitive receptors. These temporary sound barriers, which could also consist of construction grade sound blankets/curtains, should be at least 12 feet in height. Sound barriers shall be used during activities involving use of a rock drill, scraper, and/or blasting.</li> <li>• Residences or noise-sensitive land uses within 500 feet of the construction site should be notified in writing of construction at least seven (7) days prior to the onset of construction activities. A "construction liaison" contact person should be designated in the notifications; he/she would be responsible for responding to any local complaints about construction noise. The liaison would determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable measures to correct the problem. The phone number of the liaison should be conspicuously posted at the construction site.</li> </ul>	<p><b>NEET West Comments</b></p> <p>Additional mitigation for construction noise impacts is unnecessary and unwarranted. Remove Mitigation Measure NOI-1 from DEIR. Refer to comment letter and associated matrix for justification</p>
<p><b>TRANSPORTATION AND TRAFFIC</b></p> <p><b>APM TRA-1</b>  <b>Preparation of a Traffic Control Plan.</b> NEET West will prepare a Traffic Control Plan to describe measures to be taken to guide traffic (such as signs and workers directing traffic), safeguard construction workers, provide safe passage, and minimize traffic impacts.</p>	<p><b>TRANSPORTATION AND TRAFFIC</b></p> <p><b>TR-2</b>  <b>Minimize Effects of Temporary Roadway Disturbances.</b>  NEET West or their contractor(s) shall implement the following measures: Prepare and implement a Traffic Control Plan (TCP) to describe procedures to guide traffic (such as signage and flaggers), safeguard construction workers, provide safe passage of traffic, and minimize traffic impacts, as necessary, through the duration of construction. In the event that closure of any portion of Bell Bluff Truck Trail were to become necessary, notification shall be provided to SDG&amp;E at least 5 days in advance of anticipated closures. In the event that road closure were to become necessary for any publicly-accessible road segment, notification shall be posted and/or circulated to the public at least 5 days in advance of anticipated closures. NEET West shall employ adequate control devices, signage, a detour route, and flaggers, as necessary, through the duration of construction.</p> <p><b>Additional DEIR Mitigation:</b>  <b>Maintain Traffic Flow</b>  NEET West or their contractor(s) shall implement the following measures:</p> <ul style="list-style-type: none"> <li>• To the extent feasible, work shall be staged and conducted in a manner that maintains two-way traffic flow on roadways in the vicinity of the work site.</li> </ul>	<p>Acknowledge that Mitigation Measure TR-2 is similar to APM TRA-1 and should be considered part of the Proposed Project. NEET West accepts the language of Mitigation Measure TR-2.</p>
	<p><b>TR-1</b></p>	<p>NextEra requests revisions to this mitigation measure as identified in the comment matrix.</p>

<i>Applicant Proposed Measures</i>	<i>Draft EIR Mitigation Measures</i>	<i>NEET West Comments</i>
	<ul style="list-style-type: none"> <li>Heavy equipment and haul traffic shall be prohibited in residential areas to the greatest extent feasible. When no other route to and from the site is available, heavy equipment and haul traffic through residential areas shall be restricted to the hours of 8 a.m. to 5:30 p.m., Monday through Friday.</li> </ul>	
	<p>TR-3</p> <p><b>Emergency Coordination and Access Considerations</b> NEET West or their contractor(s) shall implement the following measures:</p> <ul style="list-style-type: none"> <li>When work is conducted on roads and may have the potential to affect traffic flow, work shall be coordinated with local emergency service providers, as necessary, to ensure that emergency vehicle access and response is not impeded.</li> <li>Access for driveways and private roads shall be maintained to the extent feasible. If brief periods of construction work would temporarily block access, property owners shall be notified prior to construction activities.</li> <li>If closure of any portion of Bell Bluff Truck Trail is necessary during Project construction, NEET West shall have staff available on-site at all times to place plates over open trenches, move construction equipment, or clear any other obstructions to allow for 24-hour emergency vehicle access to SDG&amp;E facilities.</li> </ul>	<p>No changes requested.</p>
<p><b>UTILITIES AND SERVICE SYSTEMS</b></p> <p>APM UT-1 <b>Use of Reclaimed Water.</b> To the extent feasible, NEET West will utilize reclaimed water from the Padre Dam Municipal Water District's Reclaimed Water Facility. If needed, NEET West will coordinate with other water suppliers, including the Descanso Community Water District, the San Diego County Water Authority, and possibly other local water districts within 30 miles, in attempt to acquire reclaimed water for delivery to the construction site, if available at a reasonable cost, and to meet any restrictions imposed by the water supplier(s). If a reclaimed source is unavailable prior to construction, the nearby non-potable water supply at the Wilson's ponds will be utilized to reduce the air quality emissions and traffic impacts associated with hauling water to the Proposed Project site.</p>	<p><b>PUBLIC SERVICES AND UTILITIES</b></p> <p><b>**DEIR does not include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM UT-1 which should have been considered as part of the description of the Proposed Project.</p>

	<p align="center"><b>Applicant Proposed Measures</b></p>	<p align="center"><b>Draft EIR Mitigation Measures</b></p>	<p align="center"><b>NEET West Comments</b></p>
<p>APM UT-2</p> <p><b>Recycle Construction Waste.</b> In accordance with the San Diego County Construction and Demolition Debris Ordinance, NEET West and/or its construction contractor will recycle a minimum of 90 percent of inerts and 70 percent of all other materials, and submit all applicable plans and documentation to the appropriate agency(ies).</p>	<p><b>Diversion of Solid Waste in Accordance with San Diego County's Construction and Demolition Debris Recycling Ordinance</b>  <u>NEET West and/or its contractors shall follow the requirements specified in the in accordance with the County of San Diego's Construction and Demolition Debris Recycling Ordinance, NEET West and/or its construction contractor will recycle a minimum of 90 percent of inerts and 70 percent of all other construction demolition debris materials, and submit all applicable plans and documentation to the appropriate agency(ies), and preparation of a Construction and Demolition Debris Management Plan (DMP). In accordance with Section 68.511 of the San Diego County Code, the DMP shall provide the following information:</u></p> <ol style="list-style-type: none"> <li><u>1. The type of project;</u></li> <li><u>2. The total square footage of the project;</u></li> <li><u>3. The estimated volume or weight of project construction and demolition debris, by material type that the project will generate;</u></li> <li><u>4. The maximum volume or weight of construction and demolition debris that can feasibly be diverted via reuse or recycling;</u></li> <li><u>5. The estimated volume or weight of construction demolition debris that will be disposed of in a landfill; and</u></li> <li><u>6. The name and address of any person and/or recycling facility the applicant proposes to use to collect, process or receive construction and/or demolition debris the project will generate.</u></li> </ol>	<p><b>Additional DEIR Mitigation:</b>  <b>Fund Fair Share toward Any Necessary Fire Protection Service Improvements.</b>  NEET West shall coordinate with the County of San Diego, CAL FIRE, and U.S Forest Service (USFS) to determine if any additional apparatus, equipment, personnel, or facilities are necessary to provide adequate fire service to the Proposed Project. If recommended improvements or upgrades to facilities, and/or additional apparatus, equipment, or personnel are identified, NEET West shall contribute its fair share toward the attributed costs. The Proposed Project's, or NEET West's, fair share will be proportionate to its contribution to the need for improvements.</p>	<p>Acknowledge that Mitigation Measure UT-2 is similar to APM PUB/UTL-2, and should be considered part of the Proposed Project. NEET West accepts the language of Mitigation Measure PUB/UTL-2.</p>
<p>APM UT-3</p> <p><b>Coordination with Existing Utilities.</b> NEET West will coordinate with all utility providers with facilities located within or adjacent to the Proposed Project to ensure that the design does not conflict with other utilities. No subsurface work will be conducted that would conflict with a buried utility. In the event of a conflict, the project will be realigned vertically and/or horizontally as appropriate to avoid utilities and provide adequate operational and safety buffering. Underground Service Alert will be notified a minimum of 48 hours in advance of excavation in any location.</p>	<p><b>**DEIR doesn't include a similar mitigation measure</b></p>	<p>Acknowledge NEET West's APM UT-3 which should have been considered as part of the description of the Proposed Project.</p>	<p>Acknowledge NEET West's APM UT-3 which should have been considered as part of the description of the Proposed Project.</p>
	<p><b>Additional DEIR Mitigation:</b>  <b>Fund Fair Share toward Any Necessary Fire Protection Service Improvements.</b>  NEET West shall coordinate with the County of San Diego, CAL FIRE, and U.S Forest Service (USFS) to determine if any additional apparatus, equipment, personnel, or facilities are necessary to provide adequate fire service to the Proposed Project. If recommended improvements or upgrades to facilities, and/or additional apparatus, equipment, or personnel are identified, NEET West shall contribute its fair share toward the attributed costs. The Proposed Project's, or NEET West's, fair share will be proportionate to its contribution to the need for improvements.</p>	<p>Mitigation Measures PUB/UTL-1 is part of the Fire Protection Plan approved by San Diego County Fire Authority. SDCFA is the only agency with jurisdiction for fire protection over the Proposed Project. Proposed changes to MM PUB/UTL-1 are provided on the comment matrix.</p>	