Exhibit F

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MONTEREY COUNTY

RESOURCE MANAGEMENT AGENCY

PLANNING

1441 SCHILLING PLACE, 2nd FLOOR, SALINAS, CA 93901

PHONE: (831) 755-5025/FAX: (831) 757-9516

INITIAL STUDY

Project Title:	Dynegy Moss Landing LLC (Vistra Energy)
File No.:	PLN190253
Project Location:	11283 Dolan Road, Moss Landing, California 95039
Name of Property Owner:	Dynegy Moss Landing LLC (Vistra Energy)
Name of Applicant:	Dynegy Moss Landing, LLC (Vistra Energy)
Assessor's Parcel Number(s):	133-181-011-000
Acreage of Property:	137.5 acres
General Plan Designation:	Heavy Industrial – Coastal Dependent
Zoning District:	HI (CZ)/Heavy Industrial in the Coastal Zone
Lead Agency:	County of Monterey
Prepared By:	Jacquelyn M. Nickerson, Management Analyst
Date Prepared:	April 28, 2020
Contact Person:	Jacquelyn M. Nickerson, Management Analyst
Phone Number:	831-755-5240

II. DESCRIPTION OF PROJECT AND ENVIRONMENTAL SETTING

A. Description of Project:

The proposed project involves the construction of four battery energy storage systems (individually referred to as "BESS" or collectively referred to as "four BES systems") located in the unincorporated community of Moss Landing, approximately 1,500 feet east of the Pacific Ocean coastline (see **Figure 1**). The project would take place at the Moss Landing Power Plant (MLPP) located at 11283 Dolan Road, directly east of Highway 1 and north of Dolan Road (see **Figure 2**).

The purpose of the proposed project is to support renewable energy initiatives established by the State of California. Specifically, to reduce the loss of energy procured from alternative energy sources, such as wind and solar, and aid in providing consistent reliable energy. This would occur through storage of power that is generated during off peak use times and disperse that power back to the electrical grid for use during high peak use times. The proposed four BES systems include four (4) 300-megawatt (MW) transmission connected, standalone lithium ion BES systems with associated conversion systems, and substations. The project includes construction of four (4) new structures, approximately 391,200 square feet in total, located in the southern and eastern portions of a 137.5-acre parcel to house the four BES systems.

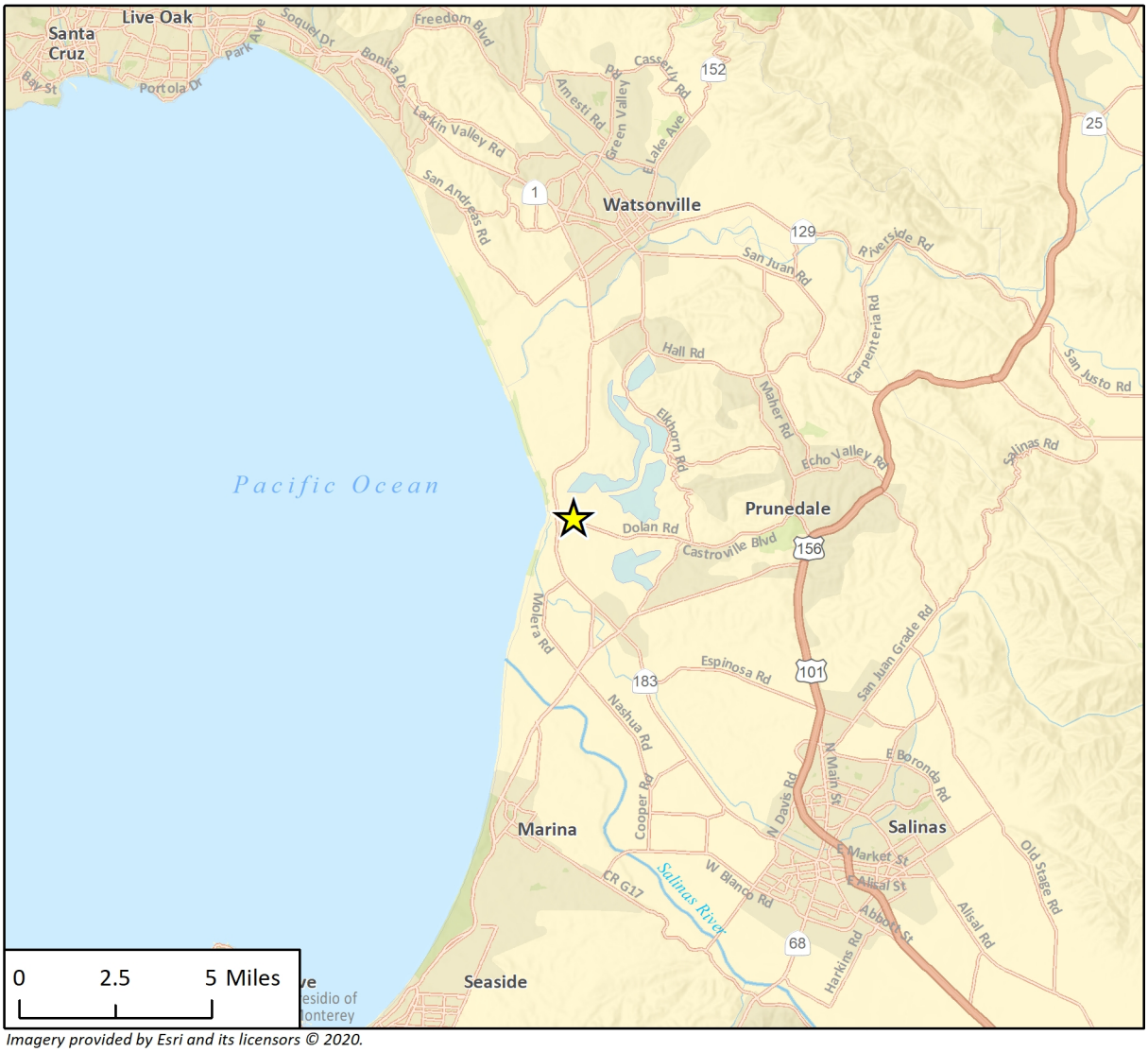
BESS Operations

Each BESS would have three major components: battery energy storage, power conversion system, and substation. Energy storage is achieved through the following process. First, the substation receives energy from the electrical grid; second, the energy current changes through the power conversion system; and third, energy is stored within the battery energy storage until utilized. When the stored energy is needed, the energy is routed out from the battery energy storage through the power conversion system and substation, and into the electrical transmission grid.

Previous BESS Project

In 2019, Monterey County prepared an Initial Study-Mitigated Negative Declaration (IS-MND) for the Duke Energy Moss Landing LLC (Vistra Energy) project. The project included the following components, all at the existing MLPP: approximately 200,000 battery modules stored within an existing building; a power conversion system containing 200 inverters and transformers, located south, adjacent to the existing building; a 46,875 square foot substation, located southeast of the building; and three interrupter poles, with a maximum height of 23 feet, that would connect the substation to the existing 500 kilovolts (kV) transmission tower and power transmission lines. The IS-MND for this project (State Clearinghouse No. 2019011067) was circulated for public review from January 29 through February 27, 2019. The IS-MND was revised and recirculated in April 2019 to address California Tiger Salamander (CTS) and Santa Cruz Long-Toed Salamander (SCLTS), per comments received from the California Department of Fish and Wildlife (CDFW). The recirculated IS-MND was approved in May 2019. Construction began in October 2019 and is scheduled to be completed by the end of 2020.

Figure 1 – Regional Setting



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★ Project Location

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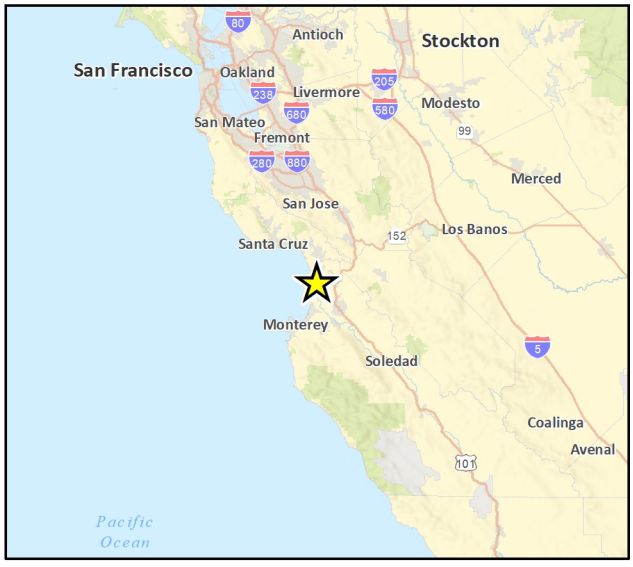

Fig 1 Regional Location

Figure 2 – Project Site

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Fig 2 Project Location

Proposed Project

The project would expand the capacity of the previously approved BESS on the site. Although this project is closely related to the previously approved BESS project on the site, it is considered a separate project as proposed components would be constructed on the same site but not within the same footprint as the previous BESS project. The proposed systems would be located south and east of the previously approved BESS. Each of the four systems would be comprised of battery modules installed into racks which are then connected to a power conversion system which is connected to a substation. The project would include the following:

- Construction of four (4) two-story buildings totaling 391,200 square feet (sf) in size (Building 1 – 106,500 sf, Building 2 – 94,500, Building 3 – 66,000 sf, Building 4 – 124,200 sf);
- Installation of 300 to 500 inverters and transformer groups;
- Two (2) substations totaling 92,000 sf (Substation 1 – 32,000 sf and Substation 2 – 60,000); and
- Three to four (3-4) new monopoles at a height of 150 feet each.

The battery modules, power conversion systems, and substations are described further below. Locations for these project components are shown on **Figure 3**. Birds-eye view of the project site is shown in **Figure 4**. Representative photos of the project components are shown in **Figure 5**.

Battery Modules

The battery modules would be stored in racks which are contained in a battery enclosure that are approximately 9 to 24 feet tall, in four new buildings, each at a height of 30 feet (see **Figure 4**). The battery racks would be grouped into blocks or independent rooms with their own access, fire barriers, and safety systems. The proposed buildings would have two levels where the batteries would be stored.

Power Conversion Systems

The power conversion systems would be located adjacent to the four new buildings. The power conversion systems would be installed on top of existing gravel and would be electrically connected between the battery storage buildings and the two substations. The power conversion system consists of paired inverters and transformers, which change power from direct current (DC) to alternating current (AC) and vice versa. The electrical transmission grid system operates in AC, but the battery energy is stored utilizing DC. Therefore, the power needs to be converted from AC to DC to enable its storage in the batteries, and conversely, it needs to be converted from DC to AC when power from the batteries is fed back into the electrical transmission grid.

The power conversion system would contain approximately 300 to 500 inverter and transformer groups, which convert the power between DC and AC and the voltage from 1.5 kV to 34.5 kV as necessary. Each inverter would be approximately 11 feet long by 5.5 feet wide by 9 feet high. Each transformer is approximately 7 feet wide by 6 feet long by 6 feet high (see **Figure 4**).

Figure 3 – Site Plan

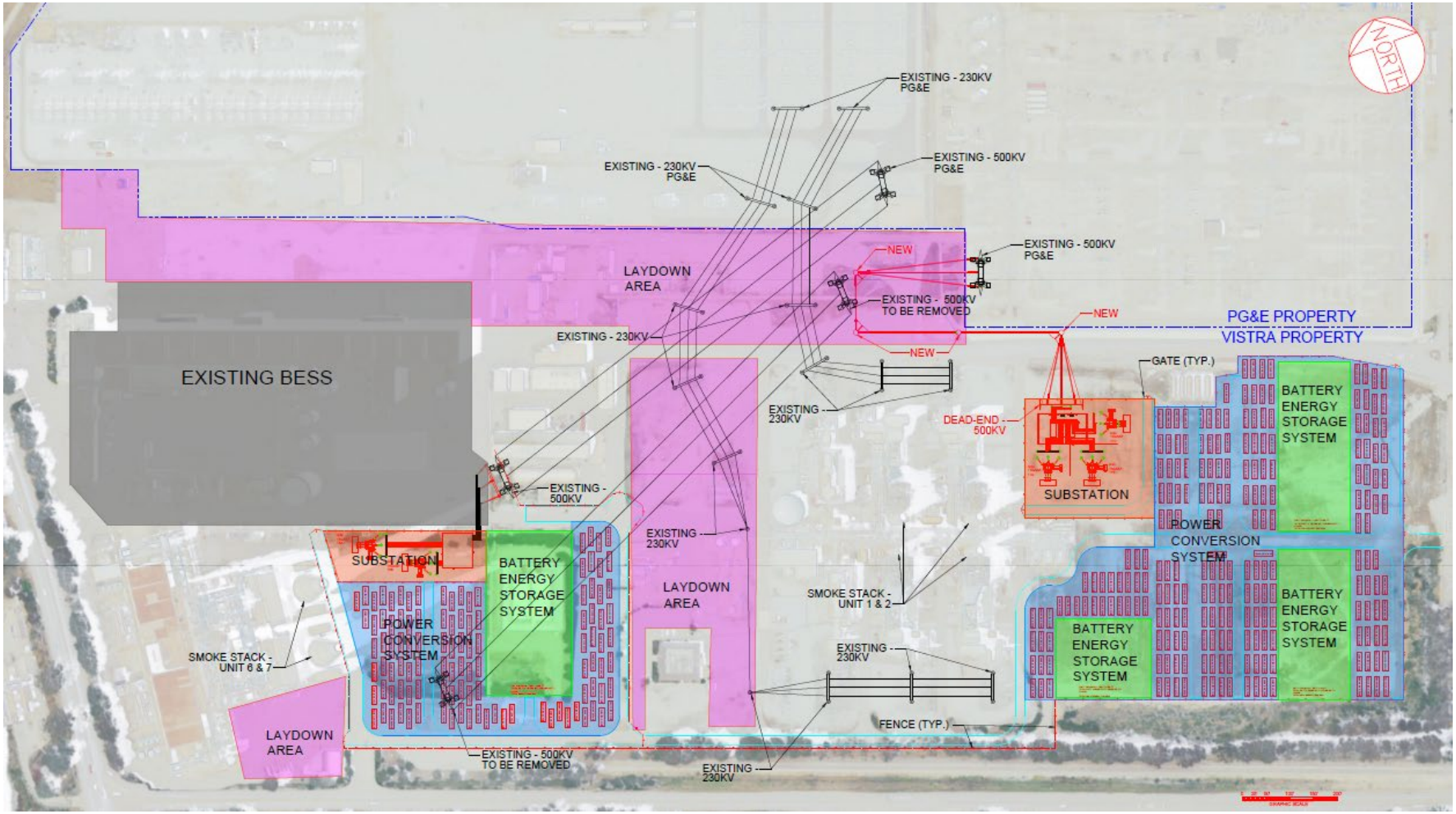
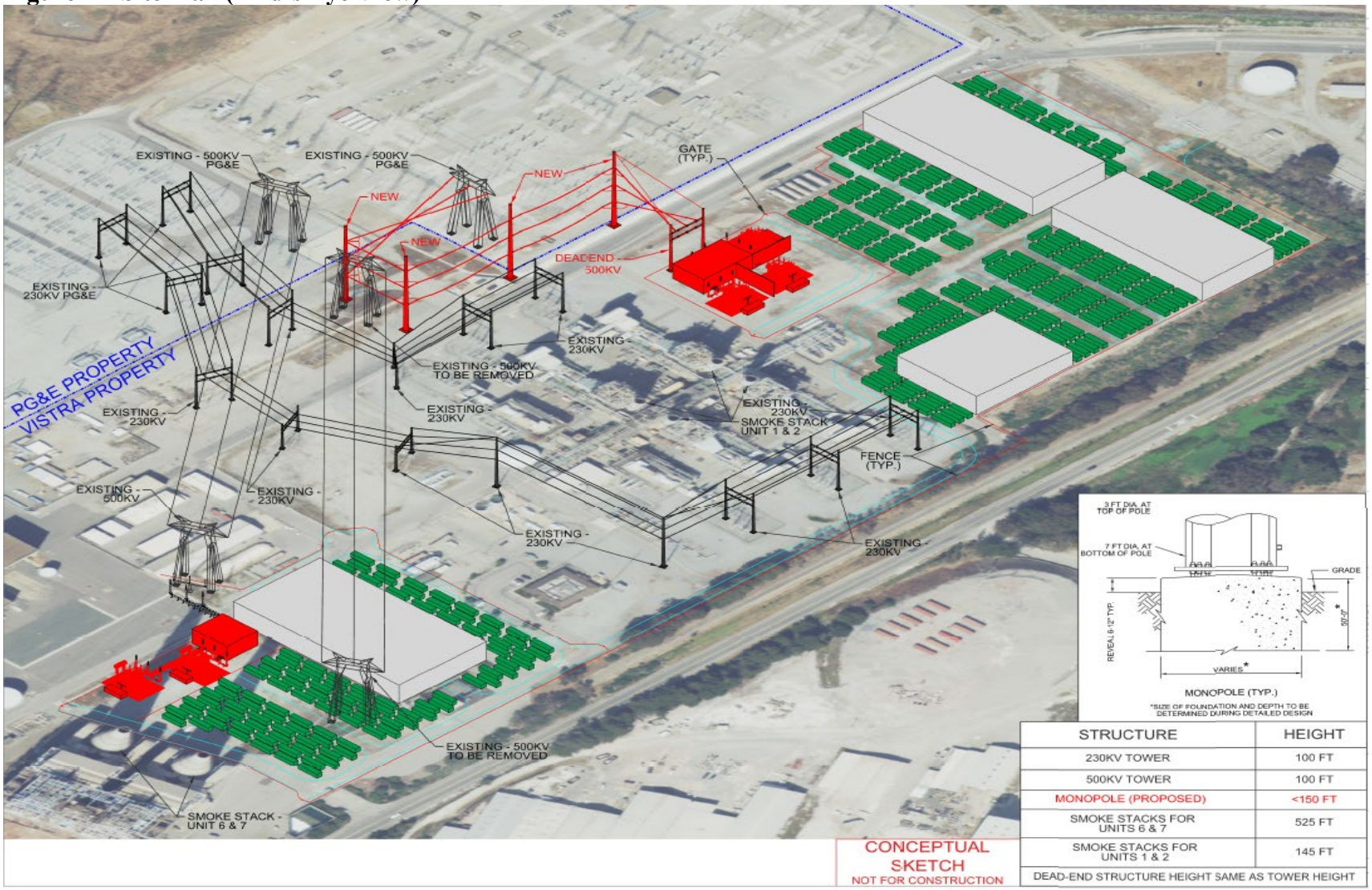


Figure 4 – Site Plan (Bird's Eye View)



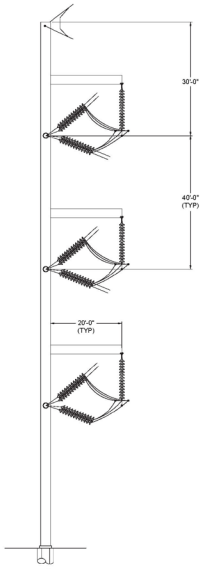
STRUCTURE	HEIGHT
230KV TOWER	100 FT
500KV TOWER	100 FT
MONOPOLE (PROPOSED)	<150 FT
SMOKE STACKS FOR UNITS 6 & 7	525 FT
SMOKE STACKS FOR UNITS 1 & 2	145 FT
DEAD-END STRUCTURE HEIGHT SAME AS TOWER HEIGHT	

Figure 5 - Project Component Photos

Battery Energy Storage

Power Conversion System

Substation



Monopole Design

Monopole Representative Photo

Source: Vistra Energy, 2019.

Substations

One expanded substation (the western substation on the site plan) and one new substation (the eastern substation on the site plan) would be required to transform the voltage between the 34.5 kV power conversion systems and the 500 kV transmission systems. The substations would contain the 500 kV transformer control house and associated breakers, switches, and miscellaneous equipment necessary to tap into existing 500 kV line. The overall dimensions of the substations would be approximately 320 by 100 feet (the expanded substation) and 240 by 250 feet (the new substation). The previously approved BESS project included a substation, this is the substation that would be expanded by the proposed project as illustrated in **Figure 3** above.

Transmission Improvements

There are three existing 100-foot 500 kV transmission towers (towers) on the project site, and two existing 100-foot 500 kV towers on the adjacent Pacific Gas & Electric (PG&E) owned site. Further, there are also existing 100-foot 230 kV transmission towers that are located around the area of the proposed four BES systems. The towers have transmission lines connected to them that then connects to PG&E's site then back on to the electrical grid.

The existing three towers, transmission lines, and capacitors leading from the location of the proposed new substation (located at the easternmost portion of the project site) would need to be removed and relocated to support the new substation location (see **Figure 4** above). The towers and dead-end support structure would be replaced with three to four new monopoles (also referred to as tubular steel poles) that are similar in size to support the new transmission line. The three to four new monopoles would be located on the access roadway north and west of the proposed new substation and north of the site within the PG&E yard (see **Figure 4 and 5** above). The proposed monopoles would be a height of 150 feet above ground and 50 feet in depth below ground. Appendages to the monopole as illustrated in **Figure 5** would extend approximately 20 feet out and the diameter of the monopole will be approximately 7 feet and taper to 3 feet as you reach the top of the monopole.

In addition, while upgrades to the PG&E substation are not anticipated, PG&E may have to modify the substation to accommodate the improved facilities, which may include replacement of the two existing towers, illustrated in **Figure 4** due to age with similar or less intrusive new towers. Work in PG&E's yard would be within the existing fenced boundaries of their previously disturbed industrial property and would involve standard ground disturbance of this previously disturbed area. Potential work in the PG&E yard may include replacement of the existing transmission line and capacitors leading from the expanded substation to the PG&E substation (the PG&E substation is located on the parcel directly north of the MLPP). If replacement is required, the towers and dead-end support structure may need to be replaced with new towers that are similar in size or less intrusive to support the new transmission line. If the structures are replaced, they would be replaced in a similar location with similar sized equipment. For the purposes of this Initial Study, this potentially required work on PG&E's site has been analyzed as part of the project since the work is reasonably foreseeable. However, as explained in subsection II.C – Project Approvals Required of this Initial Study, the scope of work for this Coastal Administrative Permit (Monterey County File No. PLN190253) is limited to the MLPP property. A separate application, if required, would need to be obtained and submitted to the County for development on the PG&E site.

Construction

The project would be constructed in four phases (one phase per BESS and associated power conversion system). The phases would be overlapping. Construction would be anticipated to take five years to complete. Installation activities would occur over about 24 months for each of the four BES systems, with the peak period of installation activity lasting about six months. The construction is anticipated to overlap with the previous BESS; however, employees/contractors onsite for both projects will not exceed a total of 420 persons, including peak installation days. Construction would result in a maximum of 924 trips per day.

The existing MLPP utilizes on average approximately 73,000 gallons of water per day, with peak annual averages of 198,000 gallons per day. During construction of the project, an average water demand would result in 100 gallons of water per day (Source 1). No additional wastewater would be created as construction employees would use portable toilet facilities.

A total of approximately 31 acres of surface area would be disturbed and 124,000 cubic yards (CY) of asphalt would be removed as part of this project. The deepest excavation would be four feet. Approximately 1,000 piers per building would be drilled to a depth of up to 50 feet to support slabs and substations. Additionally, each of the three to four 150 foot monopoles would need to be drilled down to a depth of 50 feet (see **Figure 4 and 5** above). No trees would be removed.

A preliminary Construction Management Plan (CMP) was submitted as part of the project application (Source 1) illustrating logistical planning of site improvements. As outlined in the CMP, the Project is expected to take approximately 14 months from start to finish, 6 of which is anticipated as the peak construction period. See **Construction Summary Table** below.

Construction Summary Table

Activity	Quantity	Equipment	Hours per Day	Total Work Days
General Site Maintenance	1	Water trucks	10	250
	1	Sweepers	10	250
Grading	2	Excavators	10	60
	2	Graders	10	60
	1	Rubber Tired Dozers	10	60
	2	Scrapers	10	60
	1	Tractors/Loaders/Backhoes	10	60
	2	Rubber Tired Loaders	10	60
	2	Sheep Foot Rollers	10	60
	3	Water Trucks	10	60
	24	Semi-Trucks	10	60
Concrete	4	Excavators	10	30
	8	Skid Steer Loaders	10	30
	8	Plate Compactors	10	30
	8	Rough Terrain Forklifts	10	30
	4	Air compressors	10	30
	4	Cranes	10	30
	4	Concrete Pumpers	10	30
	34	Concrete Trucks	12	30
Building exterior	8	Cranes	10	30
	32	Aerial Lifts	10	30
	16	Welders	10	30
Building roof	8	Rough Terrain Forklifts	10	30
	8	Cranes	10	30
	8	Aerial Lifts	10	30
Mechanical, Electrical, and Plumbing	8	Rough Terrain Forklifts	10	30
	4	Air compressors	10	30
	8	Aerial Lifts	10	30
Installation of Batteries	8	Forklifts	10	180
	20	Semi-Trucks	12	350

The CMP includes a number of construction traffic management actions to ensure vehicle trips are directed away from Highway 1(see proposed haul route illustrated in **Figure 6** below) and the amount of temporary construction traffic stays within the parameters of the maximum of 924 vehicle trips per day. The proposed actions include carpooling incentives, enforcement of one site entrance per vehicle, and scheduling shift changes and deliveries of construction material during off-peak hours. Further, in the unlikely case, the Monterey County RMA-Public Works

and Facilities Division would also have discretion to require the use of California Highway Patrol during the BESS shift changes.

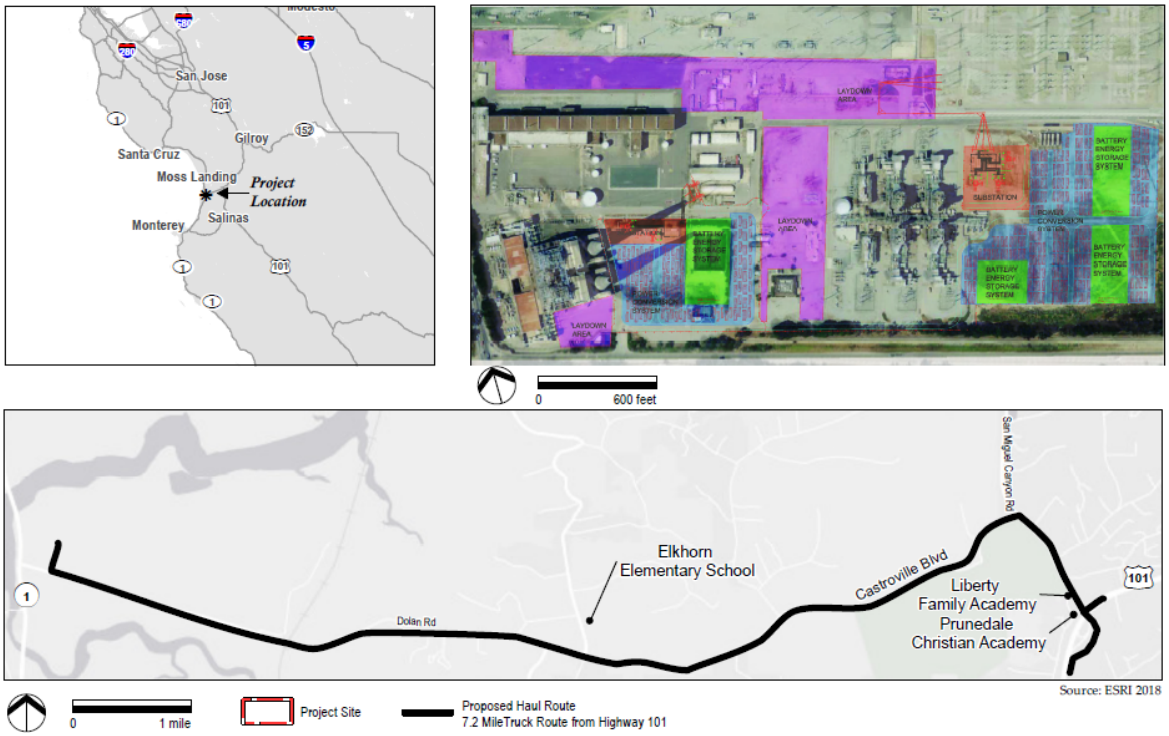


Figure 6 – Proposed Haul Route

Battery Installation

Trucks would deliver the battery racks in containers. The racks would then be placed within each of the blocks (rooms). After the racks are installed in each block, the racks would be wired together, creating strings of wire. Each floor of the proposed buildings is anticipated to store the battery racks.

Power Conversion System Installation

First the foundations would be prepared for the inverters and 34.5 kV transformers. The foundation would be either a concrete slab or a metal skid. The inverters and transformers would be delivered by truck and a crane would lift the equipment into place.

Substation Installation

Substation installation would involve removing existing asphalt and excavating soil to allow equipment foundations for the substation transformer and 500 kV and 64.5 kV breakers would be installed. Upon completion of the foundations, pier foundations would be installed for the support structures and control house. The equipment would be delivered by truck and lifted into place by a crane.

Wiring and Commissioning

The wiring processes connect the batteries to the inverters and transformers that are part of the power conversion system and the power conversion system to the substation.

Operation

The project would be operational 24 hours a day, 365 days a year. The project site physical facilities (exterior paved areas, battery building, etc.) would be maintained by existing MLPP maintenance personnel on an as-needed basis. As such, there would be no increase in permanent employees as a result of the project and therefore, no operational increase in traffic, parking, water use, or wastewater generation. Periodically, it may be necessary to test and/or replace individual battery modules. The four BES systems would be continuously monitored to determine if and when testing and possible replacement of individual battery modules may be necessary.

Transportation/Access

There are three vehicular access points to and from the subject property. Primary access is through the driveway entrance off Dolan Road, approximately 0.75 mile east of the Highway 1 and Dolan Road intersection. A secondary access point, for egress only, is located approximately 550 feet east of Highway 1 off Dolan Road. A tertiary access, for emergency services only, is located over 800 feet from the intersection of Highway 1 and Dolan Road, directly off Highway 1.

Security

The MLPP is currently secured with a chain link fence and is under constant video surveillance, with video monitoring by on-site security personnel. All traffic into the MLPP must pass through a guardhouse security checkpoint, which includes a vehicle barrier. This existing condition would remain in effect during operation of the proposed project.

With any BESS, there is a risk of fire resulting from overheating or electrically faulty conditions in the battery energy storage. To address this concern, the project includes passive physical, electrical, and control features. Additionally, a range of active fire protection features would be installed in the battery storage building in the unlikely event that the passive source features were to fail. Further, the project is controlled by a battery management system, which protects batteries from operating outside their safe operating conditions by shutting down battery charging and isolating the batteries. This is achieved with a number of redundant fire protection measures at the lithium ion cell level, the module level, the battery rack level, and the battery enclosure level. Protection methods and materials would include: smoke/fire detection sensors (e.g. ground fault detection, alarms, systems for automatic shutdown of cooling fans and opening of electrical contacts in the battery system) and automatic activation of fire suppression systems. The battery systems would contain integrated safety systems to actively monitor electrical current, voltage and temperature to optimize performance, mitigate potential failures, and prevent upset. Batteries performing out of specification would be immediately taken offline by the automated monitoring system. Periodically, it may be necessary to test and/or replace individual battery modules. The four BES systems would be continuously monitored to determine if testing and possible replacement of individual battery modules would be necessary.

The proposed physical facilities (exterior paved areas, battery building, etc.) would be maintained by existing MLPP maintenance personnel on an as needed basis.

There would be no need for new continuous, exterior lighting. Motion sensor lighting would be placed in specific locations as needed to assure safe ingress and egress from the four battery storage buildings and the substations. All exterior lighting would be shielded and downcast per County requirements. The battery storage buildings would include interior lighting. There is no proposed lighting for the existing transmission towers or proposed monopoles.

Solid Waste

During the construction and installation phase, solid waste would be likely to include construction and packaging materials, the majority of which is expected to be recyclable. However, the types and volume of these materials cannot be projected at this time as no vendor has been selected. Little to no solid waste would be generated during operation that would require disposal at a landfill. The anticipated life of the project, including the batteries, is 20 years. The content of the batteries would be dependent on the vendor selected to provide the batteries. Lithium nickel manganese cobalt batteries or lithium-iron phosphate batteries would likely be used. The batteries would be housed in a metal casing and contain an internal fuse. At the end of their functional lifetimes, the batteries would be removed from the battery racks and returned to the manufacturer or their approved recycling partner(s) for dismantling and material processing. Approximately 95 to 98 percent of the battery content is recyclable.

B. Surrounding Land Uses and Environmental Setting:

The MLPP is located in the unincorporated community of Moss Landing, approximately 1,500 feet east of the Pacific Ocean coastline, within an established industrial area located on the northeastern side of Highway 1 and Dolan Road intersection. The subject property and surrounding properties are highly disturbed. To the north of the property is PG&E's electric transmission operations and maintenance headquarters (Assessor's Parcel Number 133-181-010-000) and to the south of the property is Moss Landing Business Park (Assessor's Parcel Number 133-172-013-000). West of the property, on the other side of Highway 1, lies Moss Landing Harbor. The property to the east is vacant.

MLPP Background

The MLPP was originally constructed in 1949 as a natural gas and oil powered steam power plant. In 1950, the MLPP began operating and generating electricity. MLPP had made substantial upgrades and improvements in which they called the "Modernization Plan." This plan was developed in 1999 and was constructed from 2000 to 2005. Since buildout of the Modernization Plan, three warehouse storage buildings and a 742 sf non-occupied modular equipment enclosure have been constructed.

Existing MLPP Conditions

In addition to paved and unpaved parking areas and access roads, supporting electric power generation facilities remain on a 90-acre portion of the subject property. These facilities are listed in **Table 1**.

Table 1 – Existing MLPP Facilities

Facility	Existing Function
Power (turbine) building for former Units 1-5	Approved BESS facility
Administration	Still in use
Warehouse	Still in use
Maintenance buildings	Still in use
Two cooling water intake structures	One intake in service
Two 500-foot chimneys for retired Units 6 and 7	Units not in use Distilled water tank in base still in use
Four 145-foot chimneys for operating new Units 1 and 2	Tank in use
Oil/Water separator system located west of Unit 1 and north of the Energy Management Center	Still in use
Boiler make-up system (evaporator and demineralizers)	Still in use
Energy Management Center building	Still in use
Single-story 742 square foot non-occupied modular equipment enclosure to house variable frequency drive controls for the Units 1 and 2 circulation water pumps	Still in use
Battery Energy Storage System Project in existing building	In construction (pending)

Source 2

The remaining 47.5 acres of the property, east of the active portions discussed above, is a former fuel oil tank farm site. Demolition/cleanup of the fuel tanks and associated equipment has been completed (Source 2) and the area is now unpaved and vacant.

C. Project Approvals Required:

The subject property is governed by policies and regulations contained in the 1982 Monterey County General Plan (General Plan; Source 3), the North County Land Use Plan (NC LUP; Source 4), the Moss Landing Community Plan (MLCP; Source 5), the Monterey County Coastal Implementation Plan Part 2 (North County CIP; Source 6), and the Monterey County Coastal Zoning Ordinance (Source 7) Part 1 (Title 20). The proposed project would require approval of a Coastal Administrative Permit to establish four (4) new BESS, including the construction of four (4) two-story buildings consisting of a total of 391,200 square feet (Building 1 - 106,500 square feet, Building 2 - 94,500 square feet, Building 3 - 66,000 square feet and Building 4 - 124,200 square feet), installation of 300-500 inverters and converters, and the placement of two (2) substations totaling 92,000 square feet (Substation 1 - 32,000 square feet and Substation 2 - 60,000 square feet) which include three (3) to four (4) new monopoles at a height of 150 feet. The project would result in grading of 124,000 CY of cut.

The County of Monterey's Local Coastal Plan (LCP), which was adopted by the Board of Supervisors as part of the Zoning Ordinance (Source 7) has been certified by the California Coastal Commission; therefore, the County is authorized to issue Coastal Permits. No other discretionary public agency approvals would be required.

Subsequent to obtaining the above discretionary permit approvals, the project would require ministerial approval from the Environmental Health Bureau, Resources Management Agency (RMA)-Public Works and Facilities, RMA-Environmental Services, and North County Fire Protection District through the County's building permit process. In addition, any conditions of approval required by the reviewing agencies would require compliance prior to issuance and/or final of ministerial permits. RMA-Environmental Services has conditioned the project to require obtaining a Stormwater Pollution Prevention Plan (SWPPP). Therefore, approval by the Central Coast Regional Water Quality Control Board (CCRWQCB) would also be required. The subject parcel is also within the appeal jurisdiction of the California Coastal Commission (CCC). However, pursuant to Section 20.86.080.A of Title 20, the project is not appealable to/by the CCC because the project is not between the sea and first through public road paralleling the sea or within 300 feet of the inland extent of any beach or of the mean high tide line of the sea where there is no beach, and the project does not involve development in the underlying zone as a conditional use. No other public agency permits would be required under this request.

III. PROJECT CONSISTENCY WITH OTHER APPLICABLE LOCAL AND STATE PLANS AND MANDATED LAWS

Use the list below to indicate plans applicable to the project and verify their consistency or non-consistency with project implementation.

General Plan	☒	Air Quality Mgmt. Plan	☒
Specific Plan	☐	Airport Land Use Plans	☐
Water Quality Control Plan	☒	Local Coastal Program-LUP	☒

1982 Monterey County General Plan

Within the coastal areas of unincorporated Monterey County, the General Plan (Source 3) policies apply where the Local Coastal Program (LCP) is silent. This typically is limited to noise policies as the LCP policies contain the majority of development standards applicable to development in the coastal areas. The proposed project is consistent with the heavy industrial land use and zoning designation of this site. The proposed project would expand the capacity of the previously approved BESS on the site. Therefore, the project is consistent with the General Plan. **CONSISTENT**.

North County Land Use Plan/Moss Landing Community Plan and Coastal Implementation Plan

The project was reviewed for consistency with the NC LUP (Source 4), MLCP (Source 5), and CIP (Source 6), which provides goals and policies for development in the incorporated coastal area of North Monterey County. These make up the LCP that applies to the project. Chapter 7 of the NC LUP outlines three basic tests for demonstrating a project's conformance with the plan: 1) the project must conform to the type and intensity of uses permitted within the specific geographical area concerned; 2) the project must conform to the policies listed in Chapters 2 through 6 of the NC LUP[1]; and 3) the project must fully meet any specific zoning provisions adopted to implement the plan. As described in Section II.A, *Description of Project*, the project consists of four BES systems (see **Figure 3**) on a property with a Heavy Industrial – Coastal Dependent land use designation and zoned Heavy Industrial. As discussed in Sections IV and VI of this Initial Study, the project, as proposed, conditioned, and mitigated, is consistent with Chapters 2 through 6 of the NC LUP. **Figure 5** of the MLCP acknowledges the existing energy facility and industrial use of the project site. Policies in Chapter 5 of the MLCP allow for expansion and modernization of the facility provided off-site expansion is avoided and it conforms to all other requirements of this plan, and other state and federal regulations. The proposed project would provide energy storage to allow for sustainable, renewable energy resources within an existing developed area of the site. **CONSISTENT**.

Air Quality Management Plan

The Air Quality Management Plan (AQMP, Source 8) for the Monterey Bay Region addresses attainment and maintenance of state and federal ambient air quality standards within the North Central Coast Air Basin (NCCAB), including Moss Landing. Consistency with the AQMP is an

[1] If the proposal is not consistent with the policies contained in Chapters 2 through 6, the project shall not be approved unless it is modified to be consistent.

indication that the project avoids contributing to a cumulative adverse impact on air quality; not an indication of project specific impacts which are evaluated according to the Monterey Bay Air Resources District's (MBARD) adopted thresholds of significance (Source 9). Indirect emissions associated with industrial population-serving projects[2] are found consistent with the AQMP if any project related population increase does not exceed the estimated cumulative population of the relevant forecast listed in the AQMP. The project is intended to provide for an efficient operation of a public utility. It is anticipated that there would be no increase in permanent employees as a result of the project, resulting in no increase of population in the area due to project operation. The project does not include residential development and therefore, would not result in a population increase not already accounted for in the AQMP. Direct emissions associated with industrial population-serving projects are found consistent with the AQMP. The proposed four BES systems would not result in population growth, as no new employees would be required under operation of the project; therefore, the project would not result in an exceedance in growth projections that would conflict or obstruct implementation of the AQMP. The project's construction emissions that would temporarily emit precursors of ozone are accommodated in the emission inventories of state- and federally-required air plans. The project would not cause an increase of stationary emissions than what currently exists. **CONSISTENT**.

Water Quality Control Plan

The subject property lies within Region 3 of the CCRWQCB which regulates sources of water quality related issues resulting in actual or potential impairment or degradation of beneficial uses, or the overall degradation of water quality. Operation of the project would not generate pollutant runoff in amounts that would cause degradation of water quality. In accordance with Chapter 16.12 of the Monterey County Code (MCC), the proposed project has been conditioned by RMA-Environmental Services requiring the applicant to submit a drainage and erosion control plan. The CCRWQCB has designated the Director of Health as the administrator of the individual sewage disposal regulations, conditional upon County authorities enforcing the Regional Water Quality Control Plan, Central Coast Basin (Basin Plan; Source 10). These regulations are codified in Chapter 15.20 of the MCC. For additional discussion on hydrology and water quality, please refer to Section IV.A.3 of this Initial Study. **CONSISTENT**.

[2] Industrial projects intended to meet the needs of the population forecasted in the AQMP.

IV. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED AND DETERMINATION

A. FACTORS

The environmental factors checked below would be potentially affected by this project, as discussed within the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☒ Energy
☒ Geology/Soils	☒ Greenhouse Gas Emissions	☒ Hazards/Hazardous Materials
☒ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☒ Transportation	☒ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfires	☒ Mandatory Findings of Significance

Some proposed applications that are not exempt from CEQA review may have little or no potential for adverse environmental impact related to most of the topics in the Environmental Checklist; and/or potential impacts may involve only a few limited subject areas. These types of projects are generally minor in scope, located in a non-sensitive environment, and are easily identifiable and without public controversy. For the environmental issue areas where there is no potential for significant environmental impact (and not checked above), the following finding can be made using the project description, environmental setting, or other information as supporting evidence.

☐ Check here if this finding is not applicable

FINDING: For the above referenced topics that are not checked off, there is no potential for significant environmental impact to occur from either construction, operation or maintenance of the proposed project and no further discussion in the Environmental Checklist is necessary.

EVIDENCE:

VI.1 Aesthetics. Data contained within the Monterey County Geographic Information System (GIS) (Source 45), North County Land Use Plan, and Moss Landing Community Plan (MLCP) does not identify the subject property to be within a visually sensitive

scenic area. The project would develop four BES systems on a heavy industrial-zoned site that is currently developed with similar industrial uses. Proposed structures would be consistent with the existing visual landscape of the site and surrounding industrial parcels. Based on visual simulations (Source 11), the new structures proposed as part of the project would not be visible from off-site locations, with the exception of facing north and northwest from Dolan Road (partially visible through trees), and facing east from Highway 1 (adjacent on-site structures [145 feet] significantly taller than proposed structures [35 feet]). Further, as illustrated in **Figure 3 and 4, and Table 1** above, there are existing industrials facilities such as a three-story building approximately 75-feet in height, two 500-foot smokestacks, four 145-foot smokestacks, existing 100-foot 500 kV and 230 kV transmission towers, and other associated infrastructures. Therefore, the addition of the project would be consistent with the existing visual character and quality of the project site. The project would not conflict with policies and goals provided in local planning documents, including the General Plan, which contains policies regarding ridgeline development, and disruption of views from scenic routes. Highway 1 is not an officially designated or eligible scenic highway in the vicinity of the site, and no scenic highways are located within two miles of the project site. The project would result in new motion-activated security lighting on proposed structures, which would be downcast and shielded per County requirements and condition of approval. This lighting would be consistent with the existing lighting on the site and in the surrounding industrial areas, and would not create a new source of continuous external nighttime lighting to what already exists on the subject property. In addition, the proposed Project was brought before the North County Coastal Land Use Advisory Committee on October 16, 2019 for review of consistency with the neighborhood character. No objections or comments were made relative to aesthetics. In conclusion, implementation of the Project would have no impact on aesthetic resources. *Therefore, the proposed project would not result in any impacts to aesthetics* (Source 1, 11, 12 and 48).

VI. 2 Agriculture and Forest Resources. The subject property located on a heavy industrial-zoned site, surrounded by similarly zoned sites, and is designated as Urban and Built Up Land under the Department of Conservation Farmland Mapping and Monitoring Program. Further, Data contained within the Monterey County Geographic Information System (GIS) indicates that the subject property does not contain farmland that is Prime, Unique, or of Statewide or Local Importance; nor is it encumbered by a Williamson Act contract. The California Public Resources Code defines Forest Land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits (PRC Section 12220[g]). The areas of the project site where development would occur do not contain trees and is not considered to be forest land or timberland. *Therefore, the proposed project would not result in any impacts to agriculture or forest resources* (Source 13, 14 and 48).

VI. 11 Land Use/Planning. The project consists of installation and operation of four BES systems on already disturbed property with an existing industrial use. The operational component would be consistent with the land use designation (Heavy Industrial) and the established use of the site. Therefore, the project would not result in the physical divide of an established community as the establishment of the four BES systems would not

create a barrier, induce or reduce population, or introduce a new use inconsistent with existing uses in the area. Additionally, the project applicant prepared a Policy Consistency Analysis Memorandum, which has been independently reviewed and verified by the County, that demonstrates the project's consistency with specific General Plan and NC LUP policies (Source 46). *Therefore, the proposed project would not result in any impacts to land use and planning* (Source 20).

VI. 12 Mineral Resources. Based on the data contained in the Monterey County Geographic Information System (GIS), it has been verified that there are no mineral resources for commercial use on the site. In addition, the Project does not include mining of mineral resources. *Therefore, the proposed project would not result in any impacts to mineral resources* (Source 3, 21 and 48).

VI. 13 Noise. Construction of the proposed project would generate a temporary noise increase in the vicinity of the site due to the use of heavy equipment. The nearest noise-sensitive receivers to the project site are located approximately 630 feet north of the laydown area along the northern boundary of the project site, more than 1,000 feet from proposed earth-moving activities, and an average of 2,000 feet from active construction areas. Acoustical shielding is provided by the existing concrete wall along the northern property boundary of the power plant. The types of construction equipment anticipated to be used would not generate noise above 64 dBA at 1,000 feet. Due to the distances between active construction areas and the nearest noise-sensitive uses (2,000 feet), existing concrete wall, and the types of construction equipment, construction noise would not generate a significant impact.

Operationally, the project would result in noise from the generator step-up transformers and power conversion system, which would result in noise levels of 85 A-weighted decibels (dBA) or lower at 3 feet and 80 dBA at 3.28 feet per applicant-provided information, respectively. Project operational noise is estimated to be up to 41 dB at the nearest residential receivers to the north of the site. The County's standard for residential uses, per the General Plan, is up to 60 dB for normally acceptable noise. Therefore, noise levels associated with project operation would generate noise at 19 dB below the County's 60-dB noise level standard for residential receivers and no impact would occur. Additionally, noise levels associated with the project would be below existing ambient noise levels at all off-site locations. This noise analysis is conservative as it does not consider any acoustical shielding provided by existing structures or the existing concrete wall located along the northern property line of the MLPP.

The dominant sources of man-made vibration are sonic booms, blasting, pile driving, pavement breaking, demolition, diesel locomotives, and rail-car coupling. It is unlikely that vibration from construction activities could be detected at the closest sensitive land uses. The nearest building to proposed construction vibration activities is located approximately 300 feet south, across Dolan Road from the project site. Typical vibration levels at distance of 300 feet would be a maximum of 0.099 peak particle velocity (PPV; inches per second) for pile driving (the highest vibration-generating pile driver estimate was used for this analysis). The County's standard for vibration impacts is no damage to adjacent structures, which would occur at maximum vibration levels of 0.12 PPV for extremely fragile buildings. More modern structures can withstand greater levels of

vibration, up to 2.0 PPV for modern industrial and commercial buildings. The nearest building to proposed vibration activities is an industrial building located 300 feet south. Vibration at this distance would be no greater than 0.099 PPV, which is below the threshold for damage of industrial buildings (2.0 PPV). Therefore, construction vibration would not exceed County standards for structure damage and no impact would occur. *Therefore, the proposed project would not result in any impacts related to noise* (Source 22 and 23).

VI. 14 Population/Housing. The proposed project would not construct housing or increase the total number of employees; therefore, it would not increase population in the area. Construction workers are anticipated to be sourced from the nearby areas and would not be required to relocate for the duration of project construction. Therefore, the project would not induce substantial unplanned population growth. Additionally, the project would not demolish existing housing or require replacement housing to be constructed. The project would not otherwise alter the location, distribution, or density of housing in the area in any significant way or create demand for additional housing. *Therefore, the proposed project would not result in any impacts related to population and housing*. (Source 1)

VI. 15 Public Services. The project site is served by the North County Fire Protection District, Monterey County Sheriff's Department, and North Monterey County Unified School District. Given that the project would not increase population, as described above, it would not result in an increase in demand for public services and would not necessitate new or physically altered government facilities. *Therefore, the proposed project would not result in any impacts related to public services*. (Source 1)

VI. 16 Recreation. Given that the project would not increase population, as described above, it would not result in an increase in use of existing recreational facilities that would cause substantial physical deterioration or require the construction or expansion of recreation facilities in the vicinity of the project. No parks, trail easements, or other recreational facilities would be permanently impacted by the proposed project. *Therefore, the proposed project would not result in any impacts related to recreation*. (Source 1)

VI. 19 Utilities/Service Systems. The project Water Supply Assessment (Source 15) identified MLPP's average water use at 73,000 gpd and the average water supply Moss Landing Mutual Water Company provides to MLPP is 163,000 gpd. The project would require an average of 100 gpd during construction, but would not require additional water for operation. Because the project would not result in a permanent increase in water demand, relocation or construction of new or expanded water systems would not be required and no change in water supply availability would occur.

MLPP is on a private on-site wastewater system. The proposed project would not result in an increase in employment that could otherwise place new demand on the system. There are no bathrooms proposed in the battery storage buildings. The project would not increase wastewater generation, would not require new or expanded wastewater facilities, and would not exceed the capacity of an existing wastewater system.

As described under Section IV.A.3, *Hydrology and Water Quality*, above, the project includes improvements to existing impervious surfaces, and would maintain the existing stormwater drainage pattern (sheet flow) across the site. Therefore, the project would not exceed the capacity of the existing stormwater drainage systems and would not require an expansion of existing stormwater facilities.

Electricity would be provided by Monterey Bay Community Power, and natural gas would not be required. Solid waste from the project site would be disposed of at the Monterey Peninsula Landfill. The project would require small amounts of electricity for minimal exterior security lighting and interior lighting of the BESS buildings. Given that the project would result in the expansion of energy storage facilities in an area already served by these utilities, increased demand for utility service would be negligible and would not necessitate the construction of additional facilities. *Therefore, the proposed project would not result in any impacts related to utilities and service systems* (Source 15 and 24).

VI. 20 Wildfire. The project site is within a Local Responsibility Area and is not within or near (within two miles of) a Very High Fire Hazard Severity Zone or State Responsibility Area. Because the site is not within or near either of these areas, CEQA Guidelines Appendix G checklist questions do not apply to the project. *Therefore, the proposed project would not result in any impacts related to wildfire* (Source 25).

B. DETERMINATION

On the basis of this initial evaluation:

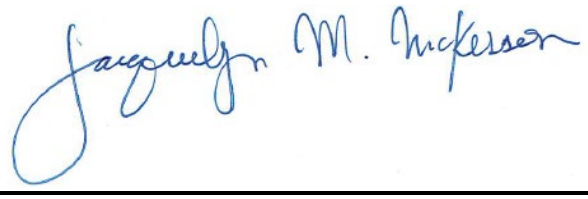
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.



Signature	May 12, 2020 Date
Jacquelyn M. Nickerson	*Management Analyst*

V. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on project-specific screening analysis).

2) All answers must take into account the whole action involved, including offsite as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

VI. ENVIRONMENTAL CHECKLIST

1. AESTHETICS **Would the project:**		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c)	In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

2. AGRICULTURAL AND FOREST RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

3. AIR QUALITY

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
This discussion incorporates the results provided in the Air Quality, Greenhouse Gas Emissions, and Energy Report conducted by EMC Planning Group, dated September 11, 2019 (Source 26).

Air Quality 3(a) – Less than Significant
Policy No. 20.1.1 of the 1982 Monterey County General Plan requires the County's land use and development policies to be integrated in, and consistent with the natural limitations of the County's air basins. The California Air Resources Board (CARB) coordinates and oversees both state and federal air quality control programs in California. CARB has established 14 air basins statewide and the subject property is in the North Central Coast Air Basin (NCCAB), which is under the jurisdiction of Monterey Bay Air Resources District (MBARD). CARB uses ambient data from each air monitoring site in the NCCAB to calculate Expected Peak Day Concentration over a consecutive three-year period. MBARD is responsible for enforcing these standards and regulating stationary sources through the 2017 Air Quality Management Plan for the Monterey Bay Region (AQMP).

The proposed four BES systems would not involve a residential use that would induce population growth. In addition, the proposed BES systems would not require new employees for operations and maintenance, and it is anticipated construction workers would be from the existing local or regional workforce. Therefore, the construction of the four BES systems and associated improvements would not induce population growth. Accordingly, the project would be consistent with the 2017 AQMP because it would not cause an exceedance of the growth projections that underlie its air pollutant emission forecasts, and impacts would be less than significant.

Air Quality 3(b) – Less than Significant with Mitigation
Construction. The proposed project includes ground disturbance on approximately 31 acres of land. Construction activities with grading and excavation that disturb more than 2.2 acres per day and construction activities with minimal earthmoving that disturb more than 8.1 acres per day are assumed to be above the 82 pounds of particulate matter per day threshold. Construction activities on 31 acres of the subject property are likely to result in soil disturbance that exceeds 2.2 acres per day and 8.1 acres per day. Therefore, construction activities could result in PM_{10} emissions that exceed the air district thresholds. For projects where construction-related emissions exceed the air district thresholds PM_{10}, the air district recommends implementing feasible mitigation measures listed on page 8-2 of the air district CEQA Air Quality Guidelines. Implementing feasible construction-phase mitigation measures, as provided in Mitigation Measure AQ-1, below, would reduce this impact to less than significant.

Operation. The proposed project would not increase long-term operational criteria air pollutant emissions. The four BES systems would collect and store energy, but would not themselves be a source of air pollutant emissions. The proposed project would not increase operational mobile source emissions; no new vehicle trips would be added by the proposed project, as there would be no change in the number of existing employees at the MLPP. Therefore, operation of the proposed project would not generate new operational criteria air pollutants and the project would have no related impacts.

Mitigation:
Implementation of the following mitigation measures would reduce potential impacts related to air quality emissions from construction to a less than significant level.

Mitigation Measure No. 1: Reduction of Fugitive Dust (Air Quality)
Per the MBARD CEQA Guidelines, the project applicant shall implement measures to reduce fugitive dust to below air district thresholds including, but are not limited to:

- Water all active construction areas at least twice daily;
- Prohibit all grading activities during periods of high wind (over 15 mph);
- Apply chemical soil stabilizers on inactive construction areas;
- Cover all truck hauling dirt, sand or loose materials;
- Plant vegetative ground cover in disturbed areas;
- Pave all roads on construction sites;
- Limit the area under construction at any one time; and
- Post the contact details of a person to be contacted regarding dust complaints.

Mitigation Monitoring Action No. 1a:
Prior to issuance of construction permits for grading or building, the owner/applicant shall include the notes outlined in **Mitigation Measure No. 1** on the construction and/or grading plans, provide a management plan to ensure the air quality measures are implemented, and identify the contact person for dust complaints. The owner/applicant shall submit said plans and information to RMA-Planning for review and approval.

Mitigation Monitoring Action No. 1b:
Prior to final inspection of construction permits for grading or building, the owner/applicant shall provide a report that illustrates how the air quality measures identified in **Mitigation**

Measure No.1 were implemented and identify if any dust complaints were submitted. The owner/applicant shall submit said information to RMA-Planning for review and approval.

Air Quality 3(c) – Less than Significant

The nearest sensitive receptor to the project site is a farm home, located approximately 630 feet north of the laydown area along the northern boundary of the project site, more than 1,000 feet from proposed earth-moving activities, and an average of 2,000 feet from active construction areas. The emissions generated by diesel equipment used during construction activities could expose sensitive receptors to toxic air contaminants (TAC) from heavy equipment diesel exhaust. Receptor exposures to TACs would be influenced by the duration of activity, use of construction equipment that conform to the United States Environmental Protection Agency's (USEPA) Tier 4 emissions standards, the distance between the activity and the receptor, and by the location of the receptor and construction areas relative to prevailing wind direction. Emissions generated during construction activities would be temporary because the use of heavy equipment would be limited to the construction period. As a result, prolonged exposures would not occur. TACs from construction equipment have decreased significantly since USEPA introduced the Tier 4 non-road diesel engine standards in 2014. The distance between the nearest receptor and the project site is greater than the 500-foot screening distance recommended by the CARB for the preparation of health risk assessments. In addition, the prevailing winds from the northwest would move the diesel exhaust in the southeast direction, away from the sensitive receptors. Therefore, emissions generated during construction activities would not expose sensitive receptors to substantial concentrations of TACs and impacts would be less than significant.

Air Quality 3(d) – No Impact

During construction activities temporary odors from vehicle exhaust and construction equipment engines would occur. However, construction-related odors would disperse and dissipate and would not cause substantial odors at the closest sensitive receptors (located approximately 630 feet north of the laydown area along the northern boundary of the project site and more than 1,000 feet from the part of the project site where earth-moving activities would occur). In addition, construction-related odors would be temporary and would cease upon completion of construction. The proposed project would involve construction of four BES systems and associated infrastructure improvements and would not result in odors or other emissions adversely affecting a substantial number of people. Therefore, the proposed project would result in no impact related to other emissions, including those leading to odors.

Conclusion:

Upon compliance with Mitigation Measure No.1, impacts from an increase in criteria air pollutant emissions at the project site would be less than significant. Impacts resulting from conflicts with the 2017 AQMP and from exposure of sensitive receptors to substantial pollutant concentrations would be less than significant with no mitigation required. Finally, the project would not result in other emissions, such as odors, affecting a substantial number of people and no impact would occur.

4. BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
This discussion incorporates the results provided in the Biological Resources Assessment (BRA) conducted by WRA Environmental Consultants, dated August 19, 2019 (Source 27), and a Focused Plant Survey Report conducted by EMC Planning Group, Inc., dated September 11, 2019 (Source 28). The BRA included a pedestrian survey by two WRA biologists, conducted in October 2018.

Biological Resources 4(a) – Less than Significant with Mitigation
Special-status species include those plants and wildlife species that have been formally listed, are proposed as endangered or threatened, or are candidates for such listing under the Federal Endangered Species Act (ESA) or California Endangered Species Act (CESA). These Acts afford protection to both listed species and those that are formal candidates for listing. The federal Bald and Golden Eagle Protection Act also provides broad protections to both eagle species that in some regards are similar to those provided by ESA. Additionally, California

Department of Fish and Wildlife (CDFW) Species of Special Concern, CDFW California Fully Protected species, United States Fish and Wildlife Service (USFWS) Birds of Conservation Concern, and CDFW Special-status Invertebrates are all considered special-status species. In addition to regulations for special-status species, most native birds in the United States (including non-status species) are protected by the federal Migratory Bird Treaty Act of 1918 (MBTA) and the California Fish and Game Code (CFGC), i.e., sections 3503, 3503.5 and 3513. Under these laws, deliberately destroying active bird nests, eggs, and/or young is illegal. Plant species on the California Native Plant Society (CNPS) Rare and Endangered Plant Inventory (Inventory) with California Rare Plant Ranks (Rank) of 1 and 2 are also considered special-status plant species and must be considered under CEQA.

Potential occurrence of special-status species on the project site was first evaluated by determining which special-status species occur in the vicinity of the project site through a literature and database search, including the California Natural Diversity Database (CNDDB), USFWS Information for Planning and Conservation Species Lists, CNPS Inventory records, and other Biological Studies conducted on or adjacent to the project site.

The majority of the project site is characterized by paved areas for parking and industrial use, industrial buildings, and areas that were former fuel tanks (**Figure 2**). Much of the proposed project site is paved and does not support any vegetation. The portion of the site proposed for the BES systems and substation was formerly used for fuel tanks that have been removed. These areas are graveled, regularly used, and maintained. They are largely barren of vegetation with the exception of weedy (ruderal) vegetation consisting of annual non-native grass and herbaceous plants; no native vegetation or native habitat is present. The only reported special-status plant species in CNDDB with the potential to occur within five miles of the project site is Congdon's tarplant (*Centromadia parryi* ssp. *congdonii*; CNPS Rank 1B). Congdon's tarplant was not observed during a focused plant survey conducted in suitable habitat on the project site by an EMC senior biologist on September 4, 2019, which is during the blooming period for this species (Source 28). No other special-status plant species have the potential to occur within the project site due to lack of suitable soils and/or suitable habitat.

A number of special-status wildlife species are known to occur within five miles the project site, many associated with the Elkhorn Slough and its wetland and wildlands ecosystem. Others have been observed in or near the wetland mitigation site to the east of the project in wetlands and surrounding uplands. However, given the project site's current condition, special-status wildlife species have no potential to occur due to lack of suitable habitat or are unlikely to occur due to constraints imposed by existing uses (e.g., barriers to movement). No special-status wildlife was observed on the project site during the October 2018 site visit by WRA biologists. No critical habitat for federally listed species is present in the project site.

The CDFW expressed concerns about the potential presence of Santa Cruz Long Toed Salamander (SCLTS), California Tiger Salamander (CTS), and peregrine falcon (*Falco peregrinus anatom*) on a previously approved project at the project site and on parcels near the proposed project site. Biologists from EMC and WRA evaluated the potential occurrence of these species within the proposed project site. The biologists determined that SCLTS and CTS are unlikely to occur on the project site due to lack of suitable habitat, and that current industrial uses within the project site are barriers to movement. However, suitable aquatic or upland habitat

for SCLTS and CTS may be present, and **Mitigation Measure No. 2** is provided below to ensure impacts to SCLTS and CTS are less than significant.

Protected birds may nest within or adjacent to the project site, including peregrine falcon, which is known to use the existing power plant smokestacks as nesting habitat. Project construction could disturb nesting bird species, resulting in the failure of the young to fledge. These smokestacks would not be altered by the proposed project; therefore, the project would not affect this nesting habitat. In accordance with the Migratory Bird Treaty Act of 1918, a standard condition of approval requiring a raptor/migratory bird nesting survey has been incorporated as part of the project. Implementation of this condition would ensure that the applicant retains a County approved and qualified biologist to perform a nest survey in order to determine if any active raptor or migratory birds' nests occur within the Project site or within 300 feet of the proposed grading. This standard condition of approval reduces any potential impacts to PEFA and any other protected birds to a less than significant level, removing the need for a mitigation measure.

With the implementation of **Mitigation Measure No. 2**, the project would not have a substantial adverse effect either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species. Impacts would be less than significant with mitigation.

Mitigation and standard Condition of Approval:
Implementation of the following mitigation measure and County's standard condition of approval for raptor/migratory bird nesting survey, would reduce potential impacts related to SCLTS, CTS, and migratory birds to a less than significant level.

Mitigation Measure No.2: Worker Environmental Awareness Program – SCLTS and CTS (Biology):
All personnel associated with project construction shall attend Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist or their trained designee, to aid workers in recognizing Santa Cruz Long Toed Salamander (SCLTS) and California Tiger Salamander (CTS), and sensitive biological resources that may occur on-site. The program shall include identification of the special-status species and their habitats, a description of the regulatory status and general ecological characteristics of sensitive resources, and review of the limits of construction and Mitigation Measures required to reduce impacts to biological resources within the work area. The environmental education program shall be developed in consultation with a qualified biologist and delivered by the biologist, or their trained designee, for the purpose of educating site personnel of the biology and general behaviors of SCLTS, CTS, and other sensitive species in all life stages in order to avoid impacts to these sensitive resources. The environmental education program shall be made available in English and for non-English speaking personnel translation services shall be provided. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employers, and other personnel involved with construction of the project. All employees shall sign a form documenting that they have attended the WEAP and understand the information presented to them. The training shall be repeated at least once annually for long-term and/or permanent employees that will be conducting work in the project site.

The environmental education program shall incorporate the following:

a) A presentation by a qualified biologist, or their trained designee, on how to identify SCLTS and CTS and their potential habitats;
b) Information about distribution and habitat needs of SCLTS and CTS and their sensitivity to human activities;
c) The special status of, including legal protection, recover efforts and penalties for violation;
d) Preparation and distribution of wallet-sized cards and/or a fact sheet handout containing the information identified in A-C above, for site personnel associated with the project to carry when on the project site. The applicant/owner shall make translated versions of the cards available on site and provide to employees upon request. Each card or handout shall also direct personnel to contact site supervisors in the event SCLTS and CTS is observed.

Upon completion of educational training, all site personnel associated with the project shall sign a form stating they have attended the program and understand the information and are therefore authorized to conduct work in the project area.

As a part of this operational program, the applicant shall implement avoidance measures for SCLTS and CTS that include a 50-foot no disturbance buffer delineated around all potential SCLTS and CTS burrows and potential SCLTS and CTS breeding pools within and/or adjacent to the project construction footprint. Should SCLTS and/or CTS be encountered in the project site, all personnel shall stop work within 50 feet of the SCLTS and/or CTS and the applicant and/or a qualified biologist shall immediately contact CDFW to consult on the appropriate next steps, including whether a take authorization is necessary through an Incidental Take Permit (ITP) issued by CDFW, pursuant to Fish and Game Code Section 2081(b).

Mitigation Monitoring Action 2a:
Prior to the issuance of construction permits for grading and/or building, the applicant/owner shall submit evidence to the satisfaction of the RMA Chief of Planning that a County-approved and qualified biologist has been retained to assist in developing and implementing the environmental educational and operational program. The final environmental educational and operational program shall be submitted to the RMA Chief of Planning for review and approval. The biologist shall be retained prior to any of the personnel conducting work associated with the project site and remain available until work has been completed.

Mitigation Monitoring Action 2b:
Prior to the issuance of construction permits for grading and/or building, the applicant/owner shall submit evidence to the satisfaction of the RMA Chief of Planning that all personnel associated with the project conducting work within the project area have completed the environmental education program and have been provided with a handout containing information about Santa Cruz Long Toed Salamander (SCLTS) and California Tiger Salamander (CTS), consistent with the requirements contained **Mitigation Measure No. 2**.

Mitigation Monitoring Action 1c:
Prior to the issuance of construction permits for grading and/or building, the applicant/owner shall delineate the 50-foot Santa Cruz Long Toed Salamander (SCLTS) and California Tiger Salamander (CTS) no disturbance buffer area around occupied burrows and breeding pools on all construction plans. The plans shall indicate materials

to be used to protect this area and illustrated how the protection area shall be maintained until work has been completed. Use of plastic monofilament netting is prohibited because SCLTS and CTS could become caught in this type of erosion control material. Tightly woven (less than 0.25 inch diameter) biodegradable fiber netting or biodegradable coconut coir matting shall be used for erosion control or other purposes to ensure that SCLTS and CTS do not become entrapped. County staff shall verify the avoidance measures are in place prior to commencement of work.

Mitigation Monitoring Action No. 2d:
Prior to the issuance of a construction permit, applicant/owner shall include a note on all construction plans which states: "Stop work within 50 feet of encountered Santa Cruz Long Toed Salamander (SCLTS) and California Tiger Salamander (CTS) and immediately contact the site supervisor. Prior to resuming any further project-related construction within 50 feet of the SCLTS and/or CTS, applicant shall coordinate with the project planner and CDFW to determine the appropriate next steps, including the potential need for an Incidental Take Permit."

Mitigation Monitoring Action No. 2e:
Should Santa Cruz Long Toed Salamander (SCLTS) and/or California Tiger Salamander (CTS) be encountered at the project site within 50 feet of construction activities, work shall stop in the immediate vicinity of the SCLTS and/or CTS, and the site supervisor shall be immediately contacted. The applicant/owner and/or qualified biologist shall contact CDFW immediately to consult on the appropriate next steps, including whether a take authorization is necessary through an ITP by CDFW, pursuant to Fish and Game Code Section 2081(b). The applicant shall also contact the Monterey County Resource Management Agency within 24 hours to inform the project planner of the encounter.

Mitigation Measure No. 2f:
Prior to issuance of a final construction permit, the applicant/owner shall submit a letter prepared in consultation and signed by the qualified biologist to the RMA Chief of Planning, confirming successful implementation of the environmental education and operational program and provide a summary of any SCLTS and/or CTS, as defined in Mitigation Measure 2, finds or no finds, as applicable.

Biological Resources 4(b) and (c) – No Impact
Sensitive biological communities include habitats that fulfill special functions or have special values, such as wetlands, streams, or riparian habitat. These habitats are protected under federal regulations such as the Clean Water Act; state regulations such as the Porter-Cologne Act, the CDFW Streambed Alteration Program, and CEQA; or local ordinances or policies such as city or county tree ordinances, Special Habitat Management Areas, and General Plan Elements.

The project site was surveyed by WRA biologists to determine if any wetlands and waters potentially subject to jurisdiction by the Army Corps of Engineers, RWQCB, or CDFW were present, based primarily on the presence of wetland plant indicators, and observed indicators of wetland hydrology or wetland soils. The project site and areas within 100 feet of the project site were also evaluated for the presence of other sensitive biological communities, including riparian

areas, sensitive plant communities recognized by CDFW or Environmentally Sensitive Habitats (ESH) under the North County Local Coastal Plan (NC LCP).

A wetland delineation completed for the project site prior to removal of fuel tanks in 2000 mapped a man-made wetland features within the secondary containment berms associated with the then existing tank farm (Source 47). They formed as a result of ponded winter rainfall within the containment facility. Other than these areas, no other wetlands or aquatic resources were determined to be present in the project site. Subsequently, all the fuel tanks within the project site were removed, the secondary containment berms removed, and the artificial wetlands filled as authorized by the County of Monterey under a Combined Coastal Development and Use Permit. The area where the tanks were removed was graded to provide positive drainage and the wetlands were fully mitigated. WRA biologist confirmed that no aquatic features occur within the project site. The nearest feature is a ditch that runs between the railroad right-of-way and the project site, located 100 feet from proposed development in the project site, which is in conformance with the NCLCP wetland buffer policy. Construction and operation of the project would not result in alterations of stormwater runoff or increase erosion (refer to discussions in Section VI.7 and Section VI.10), and therefore would not affect off-site wetland features.

No sensitive habitats such as wetlands, streams, riparian areas, maritime chaparral, or dunes are present within the project site. No wetlands as defined by the California Coastal Act are present within the project site. No ESH protected under the NC LCP are present. The project would have no impact on any riparian habitat, sensitive natural community, or state or federally protected wetlands.

Biological Resources 4(d) – Less than Significant with Mitigation
Wildlife corridors are generally defined as connections between habitat patches that allow for physical and genetic exchange between otherwise isolated animal populations. Such linkages may serve a local purpose, such as between foraging and breeding areas, or they may be regional in nature, allowing movement across the landscape. Some habitat linkages may serve as migration corridors, wherein animals periodically move away from an area and then return. Examples of barriers or impediments to movement include housing and other urban development, roads, fencing, unsuitable habitat, or open areas with little vegetative cover. Regional and local wildlife movements are expected to be concentrated near topographic features that allow convenient passage, including roads, drainages, and ridgelines.

As described under *impact 4(a)* above, the project site is developed with industrial uses which act as barriers to wildlife movement through the site, and the surrounding land to the north and south is also developed with heavy industrial uses or zoned for heavy industrial use. The project would construct additional industrial uses on the project site. The site is not considered to provide a wildlife corridor for any species, although individuals may traverse the site and could be present on site. As described under *impact 4(a)*, above, suitable aquatic or upland habitat may be present, which could facilitate SCLTS and CTS movement through the site, and with the implementation of **Mitigation Measure No. 2**, impacts to wildlife movement through the project site would be reduced to a less than significant level.

Biological Resources 4(e) – No Impact
The project site is located within the CZ and is zoned as HI. It is subject to the goals and polices of the NC LUP and the regulations set forth in the accompanying coastal implementation plan

which makes up part of the Local Coastal Program (LCP). The NC LUP includes policies that protect native trees, other significant vegetation, environmentally sensitive habitats, and wetlands. Monterey County also maintains a Tree Protection Ordinance, which requires a Tree Removal Permit for the removal or trimming of protected trees.

As stated in Section II.A, *Description of Project*, project construction would not remove any trees from the site, and as described under *impact 4(b-c)* above, the project site does not include significant vegetation, environmentally sensitive habitats, or wetlands, as it is developed with industrial uses. Therefore, implementation of the project would not conflict with local policies or ordinances protecting biological resources, and no impact would occur.

Biological Resources 4(f) – No Impact
The project site is not included in an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. No impact would occur.

Conclusion:
Upon compliance with Mitigation Measure No. 2, impacts to special status species at the project site would be less than significant. Impacts to riparian habitat, sensitive natural communities, and state and federally protected wetlands would be less than significant with no mitigation required. Finally, the project would not interfere with wildlife movement corridors, conflict with local policies or ordinances, or conflict with an adopted Habitat Conservation Plan or Natural Community Conservation Plan and no impact would occur.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☐	☒	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
This discussion incorporates the results provided in the Cultural Resources Assessment (CRA) conducted by Pacific Legacy, dated June 21, 2019 (Source IX.29). The CRA included a records search at the Northwest Information Center of the California Historical Resources Information System in Rohnert Park that included the project site and a 0.25-mile buffer for resources and cultural studies. The assessment found nine prior cultural resource studies that encompassed portions of the project site and 17 additional studies in the 0.25-mile buffer area. A total of four cultural resources have been previously recorded within 0.25-mile of the project site, but none were identified within the project site itself. The four sites include two prehistoric archaeological sites (CA-MNT-229 and CA-MNT-277/278), one resource containing prehistoric and historic period materials (CA-MNT-731/H), and one historic period built environment resource (CA-MNT-2052H).

Cultural Resources 5(a) – No Impact
One historic period built environment resource (CA-MNT-2052H) is located along the western side of the current highway alignment south of Elkhorn Slough. This resource is outside of the project area, and would not be impacted by construction of the project. The project site does not contain any built environment features that may be considered historical resources (Source 30). Further, the project would not remove any existing structures from the site. Therefore, the proposed project would not impact historical resources.

Cultural Resources 5(b) and (c) – Less than Significant
Based on the evidence provided in Source 29, the subject property has been subject to prior ground disturbance to a depth of 10 to 20 feet, which has essentially removed any cultural stratum or deposit that may have been present prior to construction of the plant. No cultural materials associated with CA-MNT-229 or CA-MNT-277/278 were noted within the project site during prior reconnaissance surveys or during archaeological monitoring of the eastern two-thirds of the project site. Ground disturbing activities associated with the project would require the excavation of pier/foundation footings to a depth of roughly 50 feet in the BESS locations and substation area, and excavations to a depth of 4-5 feet within the two proposed substation boundaries. The power conversion system and laydown areas would not require any vertical disturbance except for the removal of asphalt. The project site is located approximately 990 feet from the reported boundaries of CA-MNT-229 and 885 feet from CA-MNT-277/278. Given the distance between the project site and both resources, the extent of prior disturbance within the project site and broader subject property, and the findings from prior studies overlapping the

project site, it is highly unlikely that project activities would result in the discovery of cultural materials. No impacts to CA-MNT-229 or CA-MNT-277/278 are anticipated, and thus cultural resource monitoring during construction of the project is not required.

Ground disturbing activities within the project site are not expected to reveal cultural materials; however, there always remains the potential to encounter buried or possibly redeposited archaeological remains. Senior Archaeologist with Pacific Legacy recommends to immediately stop work should cultural materials and/or human remains be encountered (Source 29). This is consistent with County's standard condition of approval, which outlines steps to take in the event of a discovery during construction, including halting work in the immediate vicinity of the find until a qualified archaeologist evaluates it. this would reduce any potential impact to a less than significant level.

Conclusion:
Impacts to historical resources would be less than significant with no mitigation required. Upon compliance with County standard condition of approval, impacts to human remains are less than significant.

6. ENERGY Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
This discussion incorporates the results provided in the Air Quality, Greenhouse Gas Emissions, and Energy Report conducted by EMC Planning Group, dated September 11, 2019 (Source 26). Refer to Source 26 for a description of specific energy-related statutes and policies.

Energy 6(a-b) – Less than Significant
The proposed project includes four 300 MW transmission-connected, lithium ion BES systems. The proposed four BES systems would provide a reliable and economic means to receive, store and discharge electric energy from the California Independent System Operator-controlled electric grid, including renewable energy produced by existing solar and wind resources in the region, thereby providing an energy benefit. Further, the proposed project would support the state's energy storage goals, which in turn, support the state's greenhouse gas (GHG) reduction goals. During operation, the four BES systems would collect and store energy, but would not themselves consume energy. The proposed project would consume only a nominal amount of energy for ancillary functions such as internal building lighting and facility monitoring equipment. During construction, typical sources and quantities of electrical energy and transportation fuels would be consumed.

Given that the project would consume minimal energy during operations, that construction phase energy use would be consistent with typical practices, and most importantly, that the project supports the state's energy storage legislation, the proposed project would not result in inefficient, wasteful, and unnecessary consumption of energy.

Conclusion:
Impacts resulting from the inefficient, wasteful, or unnecessary consumption of energy, as well as from conflicts with state or local plans for renewable energy or energy efficiency would be less than significant with no mitigation required.

7. GEOLOGY AND SOILS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
This discussion incorporates the results provided in the Geologic Hazards Evaluation prepared by Kleinfelder, dated February 14, 2020 (Source 16).

Geology and Soils 7(a.i) – No Impact
Surface rapture usually occurs along fault lines and there are no known faults that traverse the subject property as identified in the Monterey County GIS (Source 48). Further, the potential for surface rapture or lurch cracking at the site is low (Source 16). Therefore, there would be no impacts related to rupture of a known fault.

Geology and Soils 7(a.ii) – Less than Significant
The project site is situated within a region traditionally characterized by moderate to high seismic activity, and earthquakes along faults in the region are expected to generate strong ground shaking at the site. There are no active faults within the immediate vicinity nor are there any that pass beneath the MLPP; however, the San Andreas Fault is located 11 miles northeast of the subject property and the Rinconada Fault is located 8 miles southeast of the subject. The structures would be designed to meet the requirements of the 2019 California Building Code (CBC) and its seismic design provisions. With compliance with the CBC, the project would not expose people and structures to potential substantial adverse effects, including the risk of loss, injury, or death related to ground shaking. The project would be subject to construction permits to ensure the plans are up to code with the CBC and inspections would be done during phases of the project for implementation of these codes. Further, the project is conditioned with a County standard condition of approval to provide a Geotechnical Report prior to issuance of any construction permits. The project itself would not increase ground shaking hazards at adjacent properties. Therefore, implementation of the condition would reduce impacts related to strong seismic ground shaking to a less than significant level.

Geology and Soils 7(a.iii) – Less than Significant
Soil liquefaction is a phenomenon in which saturated, cohesionless soils and some low-plasticity cohesive soils lose their strength due to the build-up of excess pore water pressure during cyclic loading such as that induced by earthquakes. The primary factors affecting the liquefaction potential of a soil deposit include: 1) intensity and duration of earthquake shaking; 2) soil type and relative density; 3) overburden pressure; and 4) depth to groundwater. Soils most susceptible to liquefaction are clean, loose, fine-grained sands, and silts that are saturated and uniformly graded. If liquefaction occurs, foundations resting on or within the liquefiable layer may undergo settlements. This would result in reduction of foundation stiffness and capacities.

The coastal terrace deposits that underlie most of the project area have low liquefaction susceptibility, and the liquefaction susceptibility of the artificial fill along the south margin of the site is dependent upon level of compaction. The potential for an earthquake with the intensity and duration characteristics capable of promoting liquefaction is a possibility during the design life of the project. However, the potential for widespread liquefaction is low and any limited post-liquefaction ground settlements would be limited to about 1 inch or less (Source 16).

Liquefaction and post-liquefaction settlement would be relatively small and within design and operational tolerances for the proposed development. As stated in Section II.C, *Project Approvals Required*, the project requires approval of a building permit, and the applicant must provide a project-specific geotechnical investigation, as conditioned, that confirms the subsurface conditions and liquefaction hazard and indicates any required measures to limit the potential for liquefaction. Implementation of this condition would reduce any potential impacts from liquefaction to a less than significant level.

Geology and Soils 7(a.iv) – Less than Significant
The project site is relatively flat, with no steep hillsides within or immediately adjacent to the site. There are artificial fill berms in the west expansion area (under 5 feet in height), and along the south and east margins of the east expansion area (up to 20 feet in height). While well vegetated, evidence of creep and localized shallow failure of the slopes of the eastern berm was observed during reconnaissance (Source 16). Improvements constructed in proximity to the

slopes would be potentially susceptible to debris inundation, in the event of a larger failure. However, the size of these berms is limited and would not result in significant landslides on the project site. Further, as stated in Section II.C, *Project Approvals Required*, the project requires approval of a building permit, and the applicant must provide a project-specific geotechnical investigation, as conditioned, that characterizes the berms, assesses their current static and seismic stability, and provides recommendations for site design to minimize landslide effects. Implementation of this condition would reduce any potential impacts to a less than significant level.

Geology and Soils 7(b) – Less than Significant
The U.S. Department of Agriculture National Resources Conservation Service Soil Survey shows the following soil units within the project site: Elkhorn Fine Sandy Loam, 5% to 9% slopes; and Santa Ynez Fine Sandy Loam, 2% to 9% slopes. Elkhorn Fine Sandy Loam has low erosion susceptibility and Santa Ynez Fine Sandy Loam has moderate erosion susceptibility.

Project construction, particularly during site preparation, excavation, and grading, could result in erosion and loss of topsoil from the site. The project entails grading of approximately 124,000 CY of cut. The project would be required to comply with MCC Chapter 16.12, *Erosion Control*, which sets forth required provisions for project planning, preparation of erosion control plans, runoff control, land clearing, and winter operations; and establishes procedures for administering those provisions. The subject property has an existing SWPPP for the existing industrial facilities. In accordance with CCRWQCB's requirements, and as conditioned by RMA-Environmental Services, the project is required to obtain a SWPPP specifically for the construction activities, which would reduce erosion and topsoil loss from stormwater runoff during construction.

The majority of the project site either flat or of very low gradient and would be surfaced as part of the proposed improvements. Therefore, soils would not remain exposed following the completion of project construction, and the potential for significant erosion to occur at the site during project operation is considered low.

Therefore, the project as conditioned, impacts to erosion or loss of topsoil would be reduced to a than significant level.

Geology and Soils 7(c) – Less than Significant
As described under *impact 7(a.iv)*, above, while the project site is relatively flat, it contains artificial berms that may be subject to landslides. As described under *impact 7(a.iii)*, liquefaction could occur in the artificial berms located along the southern site boundary. Lateral spreading is a potential hazard commonly associated with liquefaction where extensional ground cracking and settlement occur as a response to lateral migration of subsurface liquefiable material. These phenomena typically occur adjacent to free faces such as slopes and creek channels. While slopes do exist locally on the site, particularly the artificial berm located along the south perimeter of the expansion areas, the absence of significant thicknesses liquefiable material generally precludes the potential for liquefaction-induced lateral spreading to occur at the site.

The project would not result in the modification of the artificial berms, which are the only areas potential subject to landslides, liquefaction, or lateral spreading on the project parcel. Therefore,

the proposed improvements are not located on geologic units that are unstable, or subject to landslide, lateral spreading, liquefaction, or collapse. Impacts would be less than significant.

Geology and Soils 7(d) – Less than Significant
Expansive soil undergoes volume changes (shrinkage and swelling) with changes in moisture content. As expansive soil dries, the soil shrinks. When the moisture content increases, expansive soil swells. This behavior causes distress and damage to structures that are constructed on expansive soils unless mitigation measures are implemented.

Potentially expansive deposits were encountered during previous investigations at depths in excess of 10 feet below the ground surface. Expansive soils at these depths are not likely to adversely affect the proposed improvements, assuming the site grade does not change significantly during development. Additionally, the piers to be installed at each BESS building would provide structural support and ensure expansive soils do not affect the integrity of the building. The project has been conditioned to provide a Geotechnical Report and will be inspected and required to provide geotechnical certification to ensure the structures were installed in accordance with the Geotechnical Report. Therefore, impacts resulting for development on expansive soils would be less than significant.

Geology and Soils 7(e) – No Impact
The project would not construct facilities that would be connected to wastewater facilities, and does not include the installation of a septic tank or alternative sewer system. Therefore, no impact regarding the capability of project site soils for supporting septic tanks or alternative sewer systems.

Geology and Soils 7(f) – Less than Significant
As previously stated in Section VI. 5. *Cultural Resources*, the project would not involve ground disturbance of soils below four feet, except for piers and monopoles drilled to depths of 50 feet. Ground disturbing activities within the project site are not expected to reveal paleontological resources; however, there always remains the potential to encounter buried or possibly redeposited paleontological resources. In the event of unanticipated discovery of paleontological resources, impacts would be reduced to a less than significant level with implementation of the County's standard condition of approval as described in Section VI. 5. *Cultural Resources.*

Conclusion:
Upon compliance with County COA PD003(A), SWPPP requirements regarding erosion, and recommendations in the final project-specific geotechnical investigation required during the building permit approval process, impacts to ground shaking, liquefaction, landslides, erosion and expansive soils, unstable geologic units, and paleontological resources would be less than significant. No impacts would occur regarding surface rupture of known faults or construction of septic systems in soils incapable of supporting such a use.

8. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
This discussion incorporates the results provided in the Air Quality, Greenhouse Gas Emissions, and Energy Report conducted by EMC Planning Group, dated September 11, 2019 (Source 26). Refer to Source 26 for a description of specific GHG-related regulatory setting and reduction targets.

Neither Monterey County nor the air district has adopted a quantified threshold for GHG emissions or adopted a climate action plan that can be used to streamline the CEQA review process. MBARD has historically suggested using the thresholds of nearby air districts as reference for determining the significance of project-related GHG impacts within its jurisdiction. The Sacramento Metropolitan Air Quality Management District (SMAQMD) is the closest district to MBARD that provides a post-2020 construction GHG threshold of 1,100 metric tons (MT) of carbon dioxide equivalent (CO_2e) per year, in compliance with the goals of SB 32 (Source 31). For construction-only projects, the SMAQMD recommends amortizing GHG emissions over the life of the project. If GHG emissions from project construction are below the SMAQMD's thresholds for GHG emissions, the project would not impede the state's ability to achieve the 2030 statewide reduction goal.

Greenhouse Gas Emissions 8(a) – Less than Significant
Construction. The proposed project would generate GHG emissions during the construction period. GHG emissions would be generated during site preparation, grading, paving, building construction, and installation of batteries. Total construction emissions were quantified using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 and are projected at 15,835.15 MT CO_2e over the approximately 5-year construction period. Detailed emissions modeling results are presented in Source 26. It is common for construction emissions to be amortized over the projected operational life of a project to arrive at an average annual volume of emissions. Annual emissions over the anticipated 20-year operational life of the four BES systems would be about 791.76 MT CO_2e. This is below the reference threshold of significance of 1,150 MT CO_2e per year. Therefore, the proposed project would not generate a substantial amount of GHG emissions, resulting in a less than significant impact.

Operation. Despite construction-related impacts, the proposed project would have a substantial GHG emissions benefit. That benefit derives, in part, because the project supports implementation of the state's renewable energy generation legislation (e.g., SB 350) by facilitating full utilization of renewable energy produced across the state, and by displacing use of fossil-fuel based energy generation during peak demand periods. This and other related

renewable energy legislation are designed in large part to reduce GHG generation from fossil-fueled power plants. Other examples include AB 2514, which directs utilities in the state to develop energy storage resources and AB 546, which streamlines the permitting process for energy storage projects. The project is supporting state strategies for reducing GHG emissions from the power sector.

Each BESS is essentially comprised of electrical equipment whose operation would not be a source of point source GHG emissions. The GHG emissions generated by the consumption of electricity for ancillary functions such as internal building lighting and facility monitoring equipment would be negligible. As the project would not require an increase in existing employment at the MLPP, no new mobile source emissions would be created relative to existing conditions. Additionally, there would be no increase in existing water consumption. Therefore, the proposed project would not generate operational GHG emissions.

Greenhouse Gas Emissions 8(b) – Less than Significant
Monterey County does not have a qualified GHG Reduction Plan; however, CARB maintains a statewide Scoping Plan, which was most recently updated in 2017. The 2017 Scoping Plan represents a second update to the scoping plan to reflect the 2030 target of reducing statewide GHG emissions by 40 percent below 1990 levels codified by SB 32. GHG reduction strategies include achieving GHG reduction standards and goals set by statewide regulations, increasing the stringency of certain standards and targets, and achieving GHG emission reductions in certain sectors.

As described previously, the proposed four BES systems would not involve a residential use that would induce population growth, as it would not require new employees for operations and maintenance, and construction workers would be sourced from the existing local or regional workforce. Therefore, the construction of the four BES systems and associated improvements would not induce population growth and would be consistent with the 2017 Scoping Plan because it would not cause an exceedance of the growth projections that underlie its GHG emission forecasts, and impacts would be less than significant. Additionally, the BES systems would provide energy storage, allowing for the expanded use of renewable energy resources, which implements regulatory goals for the transition from nonrenewable to renewable energy.

Conclusion:
Impacts resulting from the generation of GHG emissions and conflicts with applicable GHG reduction plans would be less than significant with no mitigation required.

9. HAZARDS AND HAZARDOUS MATERIALS **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

As described in Section II, *Project Description*, of this Initial Study, the project includes installation of four BES systems within an existing industrial site in already disturbed areas. The subject property is currently in use, and employees are required to comply with existing regulations for handling hazardous materials (Source 1). The project also includes a Construction Management Plan (CMP) to ensure testing and proper use and disposal of contaminated soils. Past uses of the MLPP site triggered site cleanup actions ordered by the California Department of Toxic Substances Control (DTSC) to remediate potential contamination from metals, petroleum, polychlorinated biphenyls (PCBs), and volatile organic compounds (VOCs). As part of this remediation, Dynegy submits annual inspection reports that comply with the DTSC-approved Soil Management Plan (Source 32). A RCRA Closure Certification Report dated January 2019 certified that no hazardous wastes or impacted materials remain in or around the regulated units (pipelines, filter press, appurtenances, and surface impoundments), and Closure Performance Standards had been met, achieving a clean closure of the facility.

Hazards and Hazardous Materials 9(a-b) – Less than Significant
During construction of the project, hazardous materials such as fuels, lubricants, adhesives, solvents and paints may be utilized at the project site. The use of these hazardous materials would be temporary and only during the installation phase of the project. Use and storage of hazardous materials during installation could create a significant hazard to workers, the public or the environment if such materials are inappropriately managed. The MLPP maintains and implements several plans such as Hazardous Materials Business Plan/Contingency Plan, Volume I, Hazardous Materials Inventory, and Volume II, Facility Emergency Plan, Soil Management Plan, Stormwater Pollution Prevention Plan and Contractor Safety Program, which would be revised to incorporate the project (Source 1). These plans are consistent with federal, state and local hazards.

The CMP (Source 33) for the project demonstrates that excavated soils from the site would be tested and then either reused on site, reused off site, or disposed of off-site. If any soil is determined to be contaminated, it would be disposed of at a landfill licensed to accept contaminated soil.

During project operations, little to no hazardous materials are anticipated. Additionally, no new contractors or employees would be required for project operation. Existing contractors and employees would continue to comply with long-established hazardous materials regulations for MLPP designed to substantially reduce hazards from routine transport, use, or disposal of hazardous materials, and from accidents/actions that could otherwise elevate the risk of such materials being released to the environment. As proposed, the project would be monitored on a continuous basis from the operations center at the MLPP and routinely inspected. The project would be reviewed by the Monterey County Environmental Health Bureau and the North County Fire Protection District during the building permit process to ensure that the project is consistent with their applicable regulations.

The project would not increase the use of hazardous materials during project operations, and would comply with applicable hazardous materials handling and transportation regulations during construction activities. Therefore, the project would result in a less than significant impact relative to hazards and hazardous materials.

Hazards and Hazardous Materials 9(c) – Less than Significant
The nearest school facilities to the project site are the North Monterey County Unified School District offices, located more than 0.5 mile southwest of the project site, and North Monterey County Middle School located 2.5 miles southeast of the site (Source 48). Because the project site is not located within 0.25 mile of an existing or proposed school, no impact would occur.

However, the proposed haul route, per the CMP, is located approximately 130 feet from Elkhorn Slough Elementary School, and adjacent to the Liberty Family Academy and Prunedale Christian Academy (Source 48). Construction contractors and employees would be required to comply with hazardous materials regulations for the routine transport and disposal of hazardous materials, and from accidents/actions that could otherwise elevate the risk of such materials being released to the environment. Therefore, the transport of hazardous materials on roadways within 0.25 mile of existing schools would follow existing hazardous materials transportation regulations and result in a less than significant impact.

Hazards and Hazardous Materials 9(d) – No Impact
The project site is not included on the DTSC's Hazardous Waste and Substances Site List (Cortese List; Source 34), the California Environmental Protection Agency (CalEPA) list of solid waste disposal sites (Source 35), the GeoTracker list of Leaking Underground Storage Tanks (Source 36), or the list of "active" Cease and Desist and Cleanup Abatement Orders (Source 37), which are all of the lists compiled pursuant to Government Code Section 65962.5. Therefore, the project would not have the potential to create a significant hazard to the public or the environment relative to Government Code Section 65962.5.

Hazards and Hazardous Materials 9(e-g) – No Impact
The nearest airports to the project site are the Monterey Bay Academy Airport, located approximately 8.1 miles to the northwest, and the Marina Municipal Airport, located approximately 8.4 miles to the south. The site is not within two miles of a public or public use airport or within an airport land use plan; therefore, no impact would occur.

The project includes establishment and installation of four BES systems on an existing site identified as a Critical Facility in Figure E-15, Critical Facilities and Infrastructure (Electric Power Plant), of the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) adopted for the County of Monterey (Source 38). Implementation of the project would not result in the change of the site's status nor would it interfere with the implementation of the MJHMP.

The project would be located on an existing industrial site. It is not located in an area where wildlands are adjacent to an urbanized area. Additionally, as described in Section II.A, *Description of Project*, the project includes passive physical, electrical, and control features to ensure adequate fire protection measures are provided on the project site to limit the ignition and spreading of fires at the facility itself. Therefore, the project would not result in exposing people or structures to a significant risk of loss, injury, or death involving wildland fires.

Conclusion:
Impacts resulting from the routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset and accident conditions would be less than significant with no mitigation required. The project would have no impact from emissions of hazardous materials within 0.25 mile of a school, locating development on a site included on a Section 65962.5 list, located on a site within an airport land use plan or within two miles of a public use airport, conflicts with an adopted emergency response plan, or exposure of people to loss, injury, or death from wildland fires.

10. HYDROLOGY AND WATER QUALITY **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:

The subject property, also referred to as the Moss Landing Power Plant (MLPP), is an existing industrial facility and project implementation would allow installation of four BES systems, refer to Section II.A of this Initial Study. Potable water service to MLPP is provided by the Moss Landing Mutual Water Company and wastewater is served by a private on-site wastewater system. During the course of the discretionary application process, the Project has been reviewed by RMA-Environmental Services to determine consistency with Monterey County regulations relative to hydrology and water quality.

Hydrology and Water Quality 10(a), (b), (c.i), (c.ii), (c.iii), (c.iv), (d) and (e). Conclusion: Less Than Significant Impact.

It is anticipated that the project would require an average of 100 gallons per day (gpd) of water during construction, and no additional water during operation. The Water Supply Assessment

(Source 15) concludes that existing water supply for MLPP is sufficient to provide for the additional water use necessary for project construction. Groundwater is anticipated to be shallow (5-10 feet below ground surface) per the Geologic Hazards Report (Source 16) and construction would require excavations up to 50 feet in depth; therefore, it is likely that groundwater would be encountered and require dewatering during excavation. Compliance with Section 16.14.140(C) of the MCC would ensure the discharge of groundwater from dewatering is in compliance with the required NPDES permit. Implementation of the project would not substantially deplete groundwater supplies or conflict with the Monterey County Groundwater Management Plan or interfere with sustainable management of the groundwater basin.

The project includes an increase in impervious surfaces, and would implement best management practices, per the required stormwater control plan under the existing SWPPP, to ensure off-site peak-flow drainage impacts do not occur. The project would not substantially alter existing drainage patterns of the site through excessive grading or topographical modifications. Construction of the project includes site improvements that would require the removal of asphalt and excavation of soils, which could impact water quality standards caused by erosion, siltation, and/or on-site flooding. The MLPP has an existing SWPPP for the existing industrial facilities. In accordance with CCRWQCB's requirements, and as conditioned by RMA-Environmental Services, the project is required to obtain a SWPPP specifically for the construction activities. In addition, the project would be required to comply with relevant sections of the MCC that pertain to grading, erosion control and urban stormwater management (MCC Chapters 16.08, 16.12, and 16.14). With adherence to Monterey County regulations for impervious surface cover, erosion control, and urban stormwater management, the project would not result in any negative impacts related to hydrology/water quality, would not violate water quality standards or waste discharge requirements, or result in erosion or siltation on or off site. As the project would not substantially alter drainage patters of the site, it would not interfere with groundwater recharge at the site, increase the rate or quantity of surface runoff, or impede or redirect flood flows. Therefore, impacts would be less than significant.

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps 06053C0066H and 06053C0067H (Source 17 and 18) indicate that the subject property not within 100-year flood zone, or within a tsunami inundation area; however, it does indicate that a small portion of the subject property, where the main entrance is located, is within a special flood hazard area (Source 19). There is no development anticipated in this area that is included within this analysis or project application. However, RMA-Environmental Services has applied a condition of approval requiring the applicant to record a floodplain notice on the property for reference and as required within the MCC 16.12. Therefore, the project would not risk release of pollutants in flood hazard, tsunami, or seiche inundation areas. There are no lakes, or larger enclosed bodies of water, on or near the subject property, therefore there would be no hazard related to seiche. Therefore, the proposed project, as conditioned, would result in impacts that are less than significant to hydrology and water quality (Source 15, 16, 17, 18 and 19).

11. LAND USE AND PLANNING **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

12. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

13. NOISE **Would the project result in:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☒
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

14. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

15. PUBLIC SERVICES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

17. TRANSPORTATION/TRAFFIC Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:
Section 5.2.2 of the Moss Landing Community Plan (MLCP) states that the primary transportation emphasis of the Coastal Act is to preserve highway capacity for coastal access and coastal dependent land uses and recommends a reduction in the number access points from the Highway 1 to minimize hazardous and congested conditions. Section 20.144.120.A.1 of the Coastal Implementation Plan (CIP) requires that a traffic study be required for all development proposals with potential to significantly impact the service level of, or traffic safety along, Highway 1. Historical vehicular access on and off MLPP is provided along Highway 1 and Dolan Road. Primary access is through a driveway entrance off Dolan Road, approximately 0.75 mile east of the Highway 1 and Dolan Road intersection. A secondary access point, for egress only, is located approximately 550 feet east of Highway 1 off Dolan Road. A tertiary access, for emergency services only, is located over 800 feet from the intersection of Highway 1 and Dolan Road, directly off Highway 1. In accordance with the provisions of the CIP, a traffic assessment (Source 39) was submitted with the project application.

This discussion incorporates the results provided in the Traffic Assessment and Construction Transportation Management Plan conducted by Keith Higgins, dated September 10, 2019 (Source 39). The Monterey County provides a level of service (LOS) standard of LOS D for County roads, and the California Department of Transportation (Caltrans) provides a standard of LOS C/D on state highways. The County has not adopted a threshold for vehicle miles travelled (VMT).

Transportation/Traffic 17(a) – Less than Significant
There would be no increase in employment at the MLPP. The project would therefore not increase existing power plant traffic generation. Occasional deliveries for the project can be scheduled to occur at off-peak hours. The project would therefore not create any long-term traffic impacts and would not result in a decrease in LOS on any roadways in the project vicinity. No traffic analysis of ongoing traffic impacts is therefore required for the project.

The project would temporarily add traffic during construction. Project construction may begin as early as summer of 2020 and would require approximately 24 months for construction of each of

four 300-megawatt BES systems with associated conversion systems and substations, with peak activity over about six months for each system. The total duration of construction of the four systems is currently projected to be about five years. At no time would construction traffic be in excess of the traffic assumed for the permitted BESS. There would be a maximum of 420 workers (924 daily trips) for each energy system construction.

Construction would result in traffic generation similar to what has been regularly experienced during maintenance and emergency outage repair projects at the MLPP. Additionally, the physical roadway mitigations implemented for the previous larger construction project at five nearby intersections are still in place and would accommodate temporary traffic increases from the proposed project. The level of impacts would be within what has been typically generated by these regularly occurring projects. The project would, therefore, not represent a new project impact. It would result in traffic equivalent to any other maintenance project. However, to minimize project construction traffic as much as possible, a preliminary Construction Transportation Management Plan (CTMP) has been prepared by Higgins (Source 39). In order to ensure construction traffic does not exceed previous maintenance traffic levels, a condition of approval for a Construction Management Plan (CMP), which includes a CTMP shall be provided prior to the issuance of any construction permits for grading and/or building. A final Construction Transportation Management Plan (CTMP) shall be finalized and approved prior to commencement of construction. The final CTMP shall ensure daily construction traffic remains at or below 420 workers, including times where construction may overlap with the first permitted BESS (PLN180394). The CTMP shall include carpooling, shift changes, and major deliveries during off-peak hours, a cap of 420 workers, avoid using Highway 1 and provide the authority for Monterey County to require the use of the CHP for traffic control if necessary. The final CMP shall include measures to minimize traffic impacts during the construction/grading phase of the project, monitoring reports to ensure compliance and shall provide the following information: Duration of the construction, hours of operation, an estimate of the number of truck trips that will be generated, truck routes, number of construction workers, parking areas for both equipment and workers, and locations of truck staging areas. The CMP shall encourage construction equipment use of alternative fuels, if feasible, such as compressed natural gas (CNG), propane, electricity or biodiesel to reduce any diesel exhaust emissions and corresponding diesel exhaust odors. Implementation of this condition results in impacts to a less a than significant level.

Existing public transit, bicycle, or pedestrian facilities and/or adopted plans for such facilities, would not be affected by project implementation. No impact would occur to transit, bicycle, and pedestrian facilities.

Transportation/Traffic 17(b) – No Impact

SB 743 requires lead agencies to adopt VMT thresholds by July 1, 2020, for the purpose of analyzing transportation impacts. As stated previously, the County has not adopted VMT thresholds at this time. While project construction would result in up to 924 daily trips to the project site, construction would be temporary and the increase in VMT resulting from construction traffic would also be temporary. Additionally, it is anticipated construction workers would be from the existing local or regional workforce, which would result in a lower increase in VMT than if workers were from outside the region. As stated previously, the project would not increase the number of employees on the project site during operation of the project; therefore, no increase in vehicle trips or VMT would occur during project operation. The Technical Advisory published by the California Office of Planning and Research (OPR) in December 2018

(Source 40) includes a suggested screening threshold of 110 trips per day to presume less than significant impacts. Because the project would not increase trips during operation, there would be no impact.

Transportation/Traffic 17(c-d) – No Impact
The project does not include improvements to roadways or the establishment of a new use on the subject property and vicinity. Existing access for emergency ingress and egress would not be affected by project implementation. Therefore, the project would have no impact to hazards due to design features or inadequate emergency access.

Conclusion:
Upon compliance with County's standard condition of approval, impacts from a conflict with local transportation congestion policies would be less than significant. The project would not result in conflicts with transit, bicycle, or pedestrian facility policies; conflicts with CEQA Guidelines Section 15064.3; increased geometric design hazards; or inadequate emergency access, and no impact would occur.

18. TRIBAL CULTURAL RESOURCES **Would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion/Mitigation/Conclusion:

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and is:

1. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

California Government Code Section 65352.3 (adopted pursuant to the requirements of SB 18) also requires local governments to contact, refer plans to, and consult with tribal organizations prior to making a decision to adopt or amend a general or specific plan and prior to making any decisions on zoning changes related to open space. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by

the NAHC. As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "The intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to, cultural places."

Tribal Cultural Resources 18(a.i-a.ii) – Less than Significant with Mitigation
The project includes excavation of soil, and although Section VI.5 of this Initial Study found impacts to cultural (archaeological) resources less than significant with standard conditions of approval, the project would have the potential to impact tribal cultural resources. The project site is located in the aboriginal territory of the Ohlone/Costanoan-Esselen Nation (OCEN). In accordance with AB 52, the County consulted with OCEN on March 10, 2020 (Source 41). During consultation, OCEN requested the mitigation measure provided below (**Mitigation Measure No. 3**) requiring the presence of a tribal cultural monitor. Implementation of this requested mitigation would reduce potential impacts to tribal cultural resources to a less than significant level.

Mitigation:
Implementation of the following mitigation measure would reduce impacts to Tribal Cultural Resources to a less than significant level.

Mitigation Measure No. 3: Protection of Tribal Cultural Resources and Sacred Places (Tribal Cultural Resources).
In order to reduce potential impacts to cultural resources and sacred places, excavation for the project shall be observed by a Native American Tribal Monitor for the Ohlone/Costanoan-Esselen Nation (OCEN), as approved by the OCEN Tribal Council. This monitoring shall be limited to construction areas involving excavation to a depth of 15 feet or upon bedrock, whichever is first. Placement of fill and/or compaction of soils shall not require a tribal monitor. If more than one earth moving equipment is deployed at different locations at the same time, more than one tribal monitor shall be present during those periods. If at any time, potentially significant cultural resources, sacred places, or intact features are discovered, the contractor shall temporarily halt work until the find can be evaluated by the tribal monitor and archaeological monitor. If the find is determined to be significant, work shall remain halted until mitigation measures have been formulated, with the concurrence of RMA-Planning, and implemented. Since any items that may be uncovered during excavation belong to the property owner, this mitigation shall serve as notice that the OCEN Tribal Council formally requests that any sacred burial items discovered be given to the tribe by the property owner.

Mitigation Monitoring Action No. 3a:
Prior to issuance of construction permits for grading or building, the owner/applicant shall include a note on the construction plans encompassing the language contained in **Mitigation Measure 3**. In addition, the note shall state: "Stop work within 50 meters (165 feet) of uncovered resource(s) and immediately contact Monterey County RMA-Planning." Prior to resuming any further project-related ground disturbance, owner/applicant shall coordinate with the Project Planner and the Monitor to determine a strategy for either return to the OCEN tribe or reburial. The owner/applicant shall submit said plans to RMA-Planning for review and approval.

Mitigation Monitoring Action No. 3b:

Prior to issuance of construction permits for grading or building, the owner/applicant shall submit a contract with an OCEN approved Native American Tribal Monitor to RMA-Planning for review and approval. The contract shall outline logistics for monitoring during earth disturbance activities specified in **Mitigation Measure No. 3** as well as how uncovered cultural resources shall be handled, in coordination with the project archaeologist.

Conclusion:

With implementation of Mitigation Measure No. 3, the project would have a less than significant impact on Tribal Cultural Resources.

19. UTILITIES AND SERVICE SYSTEMS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☐	☒
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☐	☒
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

20. WILDFIRE **If located in or near state responsibility areas or lands classified as very high fire hazard severity zones would the project:**	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Discussion/Conclusion/Mitigation:

See previous Sections II. A (Project Description) and B (Environmental Setting) and Section IV. A (Environmental Factors Potentially Affected), as well as the sources referenced.

VII. MANDATORY FINDINGS OF SIGNIFICANCE

Does the project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Discussion/Conclusion/Mitigation:
Pursuant to Section 21083 of the Public Resources Code and Section 15065 of the CEQA Guidelines, a project would be considered to have a significant effect on the environment, and an Environmental Impact Report shall be prepared, if impacts identified cannot be avoided or mitigated to a point where no significant effect on the environment would occur. Analysis provided in this Initial Study found that there is no substantial evidence, in light of the whole record, that the project may have a significant effect on the environment.

Mandatory Findings of Significance (a) – Less than Significant
As discussed in this Initial Study, the project would expand the industrial uses on an existing heavy industrial site that is developed with impervious surfaces and does not provide substantial habitat for wildlife. The project would not cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, or restrict the range of plant or animal species. In addition, **Mitigation Measures No. 2** and County's standard condition of approval, described in Section VI.4, would reduce potential impacts to individual SCLTS, CTS, and migratory bird species. As described in Section VI.5, the project site does not contain any known important examples of the major periods of California history or prehistory. In addition, the unanticipated discovery of important cultural resources would comply with County's standard condition of approval for the discovery of unanticipated resources. Impacts would be less than significant.

Mandatory Findings of Significance (b) – Less than Significant

In addition to the proposed project, there are three projects in proximity of the site that were considered as part of the cumulative impact analysis: 1) the "Elkhorn Battery Energy Storage System Project" or "PG&E Project", located on an adjacent property to the north (PLN180371); 2) an "RV and Boat Storage Project" or "McCombs Project" on Dolan Road east of the subject property (PLN160443); and 3) the "Vistra Energy Project", which is the current permitted BESS on the subject property. The PG&E Project was approved by the Monterey County Planning Commission on February 26, 2020 and is expected to complete construction by the end of 2020 (Source 42). The McCombs Project is currently deemed incomplete by the County, but it is anticipated that operation of the facility has the potential to occur during the construction phase of the proposed project and/or PG&E Project. The Vistra Energy Project was approved by the Monterey County Planning Commission on May 8, 2019 (Source 2). The CMP identifies construction to potentially overlap with this project; however, the total amount of contractors would not exceed 420 employees or result in more than 924 daily trips. When considering these three projects together and the four BES systems, potential cumulative impacts could occur in relation to air quality, greenhouse gas emissions, hazards/hazardous materials, transportation, and tribal cultural resources. Some of the other resource areas were determined to have no impact in comparison to existing conditions and therefore would not contribute to cumulative impacts, such as aesthetics, agriculture and forestry, energy, hydrology, land use and planning, mineral resources, noise, population and housing, public services, recreation, utilities, and wildfire. No further discussion of these resource areas is warranted, as cumulative impacts would be less than significant and not cumulatively considerable. Other issues, including biological resources, cultural resources, and geology and soils, are site-specific by nature, and impacts at one location do not add to impacts at other locations or create additive impacts. Similarly, these impacts do not warrant further discussion, as cumulative impacts would not be significant or cumulatively considerable.

Proposed Project. The project would disturb approximately 31 acres of surface area and 124,000 CY of asphalt would be removed. Excavation would occur to a depth of four feet, with the exception of piers and monopoles, which would be drilled to a depth of up to 50 feet. Based on the CMP, excavated soils would be tested for contaminates, and either reused onsite or hauled off site. The CMP identified a haul route that would direct all asphalt and soil hauling trips off site via Dolan Road, Castroville Boulevard, San Miguel Canyon Road, and Highway 101. It is anticipated that grading of the project site would require the use of 15 large vehicles: two excavators, two graders, two rollers, three dozers, two scrapers, one backhoe, and three dumpers (Source 26). Further, the construction time period would potentially overlap with the first Vistra Energy Project, but employees will not exceed 420 contractors, or result in 924 daily trips, collectively on any given day.

As discussed in Section VI.3 of this Initial Study, the project has the potential to create construction related air quality impacts in a region that is in non-attainment for PM_{10}. As discussed in Section VI.9 of this Initial Study, the project has the potential to emit hazards through transportation of contaminated soils along roadways within one quarter mile of existing schools. As discussed in Section VI.8 of this Initial Study, temporary construction activities of the proposed project would be the main contributor to GHG emissions. However, impacts were determined to be less than significant. As discussed in Section VI.17 of this Initial Study, the project would add trips to local roadways that could impact the performance effectiveness of these roadways.

PG&E Project. PG&E proposes (Source IX.43) rough grading and excavation of foundations (to 18 feet below ground surface) within the identified 4.5-acre development area, excavation of approximately 7,850 CY, and fill of approximately 3,450 CY. The PG&E Project estimates 11 route-trip truck trips per week for equipment deliveries and to move soil.

PG&E proposes (Source IX.43) outbound traffic to the landfill located in Marina is proposed to be routed from Dolan Road to Castroville Boulevard to Highway 156 to Highway 1 or from Dolan Road to Castroville Boulevard to San Miguel Canyon Road to Highway 101 to Highway 156 to Highway 1. The return route from the landfill is proposed through Highway 1 North to Dolan Road.

McCombs Project. The McCombs Project does not include any grading activities. Application materials indicate that the project would not remove native vegetation or trees, require connections to water and wastewater facilities, or involve soil importation, removal, or drainage modifications (Source IX.44). includes a Traffic Management Plan that proposes drop off and pick up of stored vehicles during off peak traffic hours. The McCombs site is accessible via Highway 101 to San Miguel Canyon Road to Castroville Boulevard to Dolan Road and via Highway 1 to Dolan Road. Traffic data submitted with the McCombs application included actual driveway counts on a 1-week period from their existing operations in Scotts Valley. This data is used as the assumed traffic generated by the project. From 12:00 a.m. to 11:00 p.m. between September 19, 2017 to September 25, 2017, there was a total of 192 vehicles for inbound and outbound traffic, resulting in an average of 27 trips per day (Source 43).

Air Quality. Potential cumulative air quality impacts have been identified based on the construction components of proposed project analysis in Section VI.3 of this Initial Study, and the proposed PG&E Project. As discussed above and in Section VI.3 of this Initial Study, the proposed project has the potential to create air quality impact as individual project due to the use of construction equipment. It is anticipated that the construction activities from the PG&E Project would emit dust and fine particulate matter that would contribute the regions non-attainment for PM_{10}, thus potentially resulting in air quality impacts. The McCombs project does not include grading and therefore would not cumulatively contribute to air quality impacts. proposed project's CMP proposes to grade approximately 2,100 CY per day.[3] Section VI.3 of this Initial Study demonstrates that emission of PM_{10} per day would be under the threshold of significance following implementation of construction-phase mitigation measures consistent with the MBARD CEQA Guidelines (refer to **Mitigation Measure No. 1**). In addition, the Air Quality, Greenhouse Gas Emissions, and Energy Report provides the California Emissions Estimator Model (CalEEMod, Version 2016.3.2) results (Source 26) which calculated the maximum unmitigated overall construction emissions of PM_{10} to be approximately 2.7 tons per year (approximately 14.7 pounds per day). PG&E's CMP limits grading to 175 CY per day and PG&E's CalEEMod results submitted with the application estimated that their project would emit 7.7 pounds per day of PM_{10}. With both projects combined, the anticipated emittance of PM_{10} would be approximately 22.4 pounds per day, below the 82 pounds per day threshold established by the MBARD CEQA Air Quality Guidelines "Criteria for Determining Construction Impacts" (Source 9). Therefore, these impacts are considered less than cumulatively considerable.

[3] 124,000 CY of soil removed during grading divide by 60 days, the length of the grading phase (Source IX.33).

Greenhouse Gas Emissions. Potential cumulative greenhouse gas emission impacts have been identified based on the proposed project analysis in Section VI.8 of this Initial Study, and the Initial Study published for the PG&E Project. As discussed in Section VI.8 of this Initial Study, temporary construction activities of the proposed project would be the main contributor to GHG emissions. This would also be the case for the PG&E Project. Both projects would use typical construction equipment that emit NO_x and ROG. Use of this equipment has been accommodated within the Air Quality Management Plan (AQMP, Source IX.8) for the Monterey Bay Region. CalEEMod results submitted with the proposed project's Air Quality, Greenhouse Gas Emissions, and Energy Report (Source 26) estimated that the project would generate approximately 15,835.2 MT CO_2e over the approximately 5-year construction period. Amortization of that number over the 20-year life expectancy of the project would result in approximately 791.8 MT CO_2e. CalEEMod results submitted with the PG&E Project application estimates approximately 40.4 MT CO_2e amortized over a 30-year period. The McCombs Project would not involve grading activities or the use of construction equipment. Therefore, it is assumed that the McCombs Project would not cumulatively contribute to GHG emissions. The combined emissions from cumulative projects are below the reference threshold of significance of 1,150 MT CO_2e per year. Additionally, based on the fuel-burning construction equipment and vehicles utilized for the PG&E Project, GHGs, when combined with the proposed project would produce no more than the threshold of significance of 82 pounds per day of GHG precursors and these precursor emissions would have a less than cumulatively considerable impact on GHGs.

Hazards/Hazardous Materials. Cumulative hazardous material impacts have the potential to occur as a result from the proposed project and PG&E Project. The proposed project has the potential to emit hazards through transportation of contaminated soils during construction, through reasonably foreseeable upset and accident conditions, and through the routine use, transport, and disposal of hazardous materials. As mentioned above, the PG&E Project proposes to use similar haul routes that would result in a cumulative impact when combined with the proposed project. However, both projects would be required to comply with long-established hazardous materials regulations from routine transport, use, or disposal of hazardous materials, and from accidents/actions that could otherwise elevate the risk of such materials being released to the environment, which would ensure the avoidance of hazardous materials impact. Impacts would not be cumulatively considerable.

Traffic. Traffic trips for the proposed project, the PG&E Project, and the McCombs Project would utilize the same route: Dolan Road to Castroville Boulevard to San Miguel Canyon Road to Highway 101. The construction component of the proposed project would result in no more than 924 daily trips. The construction component of the PG&E Project (Source 43), would result in approximately 180 daily trips. The McCombs Project would result in 27 daily trips (Source 43). Using the data provided by the project applications (Source 1, 43, 44), it has been determined that cumulatively, the three projects would not degrade the LOS on the haul route roadways. Therefore, the potential impact would not be cumulatively considerable. See Table 2 and Table 3 below for a description of LOS designations on 2-lane rural highways, and the change in traffic volumes and LOS from project trips.

Table 2 – Level of Service for 2-Lane Rural Highway (Principal Arterials)

LOS B	LOS C	LOS D	LOS E
7,600	11,100	12,400	13,600

Note: The principal arterial designation is assumed for Dolan Road, Castroville Boulevard, and San Miguel Canyon Road, as all three roadways are designated as "major roads" in the County of Monterey 1982 General Plan.

Source IX.45

Table 3 – Project Roadway Cumulative LOS

Road	Existing Volume	Existing LOS	Cumulative Project Volume	Existing + Cumulative Project Volume	LOS
Dolan Road	5,000	B	1,131	7,131	B
Castroville Boulevard	8,400	C	1,131	9,531	C
San Miguel Canyon Road	26,274	E	1,131	27,405	E

Source IX.39, IX.45

Tribal Cultural. The proposed project, as described in Section II.A, *Description of Project*, of this Initial Study, proposes to disturb 31 acres of surface area and excavate up to 4 feet in depth, with piers drilled to a depth of no more than 50 feet. The project site has been previously disturbed to a depth of 10 to 20 feet and no cultural materials associated with known archaeological sites are located within the property. However, following AB 52 consultation with OCEN, a mitigation measure for tribal cultural monitoring has been applied to the proposed project to reduce any impact to a less than significant level.

The PG&E Project proposes to excavate 7,850 CY of soil within the existing PG&E substation footprint. An Initial Study prepared for the PG&E Project included the results of AB 52 tribal consultation, which occurred between the County and OCEN on April 2, 2019. This consultation resulted in the inclusion of a mitigation measure requiring a tribal cultural monitor be present during construction activities, similar to the proposed project.

Although the proposed project is not within a known archaeological site, the soil replaced within that area from previous excavations cannot be confirmed to be sterile soil. Therefore, Mitigation Measure TCR-1 requires the presence of a tribal cultural monitor during construction. With this mitigation and the tribal resources mitigation for the PG&E Project (which also requires the presences of a tribal cultural monitor during construction), any potential impact to tribal cultural resources would be reduced to a less than significant level and would not be cumulatively considerable.

Conclusion. Combined air quality and GHG emissions from cumulative projects would not exceed MBARD thresholds, cumulative projects would all be required to comply with regulations regarding the use and transport of hazardous materials, construction traffic would not degrade the LOS of truck haul routes, and tribal cultural monitors would ensure construction of cumulative projects do not disturb or affect tribal cultural resources. Therefore, cumulative impacts to air quality, greenhouse gas emissions, hazards/hazardous materials, traffic/transportation, and tribal cultural resources from the proposed project in addition to the

PG&E Project and McCombs Project would be less than significant, and the project's contribution to these impacts would not be cumulatively considerable.

Mandatory Findings of Significance (c) – Less than Significant

The project involves site improvements in already developed areas within an established industrial site; therefore, the project would not create a substantial adverse effect on human beings, either directly or indirectly. Implementation of the project would result in temporary minor incremental reductions in air quality and traffic in the project vicinity due to construction and insignificant permanent changes in traffic conditions resulting in the operational component of the project. The project would result in less than significant impacts to air quality (with mitigation), greenhouse gas emissions, geology and soils, hazards and hazardous materials. Operation of vehicles during construction activities may generate airborne odors (e.g., diesel exhaust); however, such emissions would be localized to the immediate area under construction and would be short in duration. While the project site would be exposed to ground-shaking from any of the faults that traverse Monterey County, the project would be constructed in accordance with applicable seismic design parameters in the CBC. The primary source of criteria air pollutant and GHG emissions would stem from the use of equipment during construction activities. However, equipment use would be intermittent and limited to site preparation and construction activities. Pollutant emissions resulting from equipment used during construction would not exceed significance thresholds established by the CARB for GHG because the duration of use would be limited. Moreover, the project would not create any significant air emissions beyond those associated with the current industrial uses established on the property. Construction-related noise or vibration impacts would occur at least 2,000 feet from the nearest receivers. The installation of the components of the four BES systems would not degrade the visual character of the area. Light fixtures would be installed for security and would not substantially change the overall lighting of the site. The project as proposed and conditioned would result in impacts reduced to a less than significant level.

VIII. CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE ENVIRONMENTAL DOCUMENT FEES

Assessment of Fee:

The State Legislature, through the enactment of Senate Bill (SB) 1535, revoked the authority of lead agencies to determine that a project subject to CEQA review had a "de minimis" (minimal) effect on fish and wildlife resources under the jurisdiction of the California Department of Fish and Wildlife. Projects that were determined to have a "de minimis" effect were exempt from payment of the filing fees.

SB 1535 has eliminated the provision for a determination of "de minimis" effect by the lead agency; consequently, all land development projects that are subject to environmental review are now subject to the filing fees, unless the California Department of Fish and Wildlife determines that the project will have no effect on fish and wildlife resources.

To be considered for determination of "no effect" on fish and wildlife resources, development applicants must submit a form requesting such determination to the California Department of Fish and Wildlife. A No Effect Determination form may be obtained by contacting the Department by telephone at (916) 653-4875 or through the Department's website at www.wildlife.ca.gov.

Conclusion: The project will be required to pay the fee unless a "no effect" determination can be obtained from the California Department of Fish and Wildlife.

Evidence: Based on the record as a whole as embodied in the RMA-Planning files pertaining to PLN190253 and the attached Initial Study/Proposed Mitigated Negative Declaration.

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